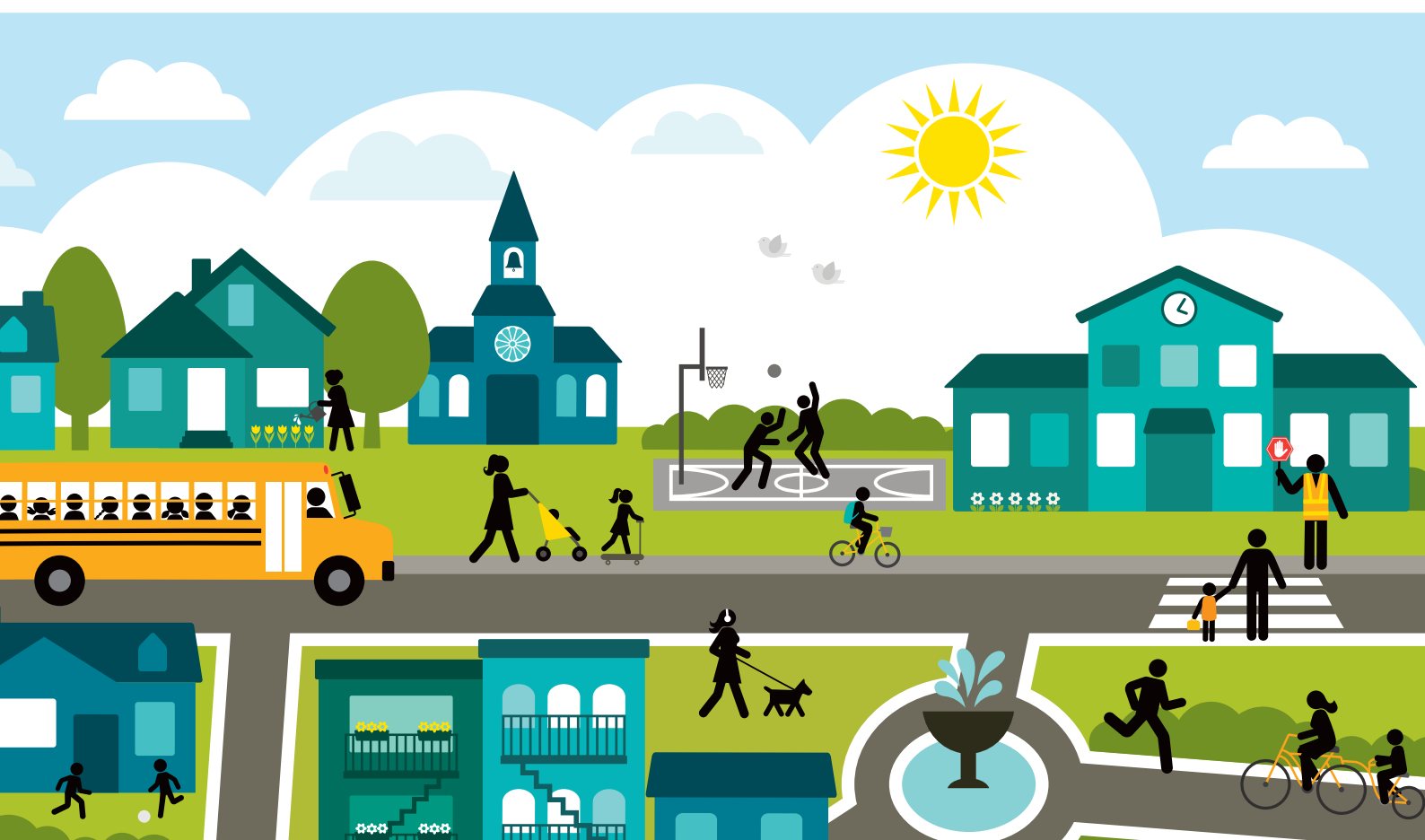




Horsham
District
Council

Sustainability Appraisal Update

Horsham District Local Plan



December 2023

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1.0 Introduction

- 1.1. This report has been prepared by Horsham District Council to document the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the ***Horsham District Local Plan 2023-2040 Regulation 19 (December 2023)*** (hereafter referred to simply as the '**Local Plan**'). This is the version of the Local Plan dated December 2023 which is due for publication in January 2024, subject to Cabinet and Council approval.
- 1.2. As set out in Chapter 2 of this report, a significant amount of Sustainability Appraisal and Strategic Environmental Assessment work has been undertaken to date, in stages corresponding to the preparation of the Horsham District Local Plan. (For brevity, this process will hereafter be referred to as Sustainability Appraisal (SA)).
- 1.3. The first stage was the Sustainability Appraisal work undertaken by Land Use Consultants (LUC) between 2019 and 2021. This work informed the development of the *Horsham District Local Plan 2021-38 Regulation 19 Draft Copy*, dated July 2021, which was considered by the Council's Cabinet in July 2021 (but ultimately did not go forward to Council) – hereafter referred to as the '**July 2021 Cabinet version of the Local Plan**'. A Sustainability Appraisal Report, prepared by consultants LUC, was published alongside that document. The *Sustainability Appraisal of the Horsham District Local Plan – Regulation 19 Consultation, Final Report*, dated July 2021, is hereafter referred to as the '**draft Regulation 19 LUC SA Document**' (or 'LUC report/Appraisal'). The Information and analysis from the draft Regulation 19 LUC SA Document has been used in this report when detailing the earlier stages of the SA process.
- 1.4. Progress on the July 2021 version of the Local Plan was delayed due initially to legal issues arising from publication of a revised National Planning Policy Framework (NPPF), and subsequently the issuing of a Position Statement by Natural England effectively requiring all development in the District to demonstrate water neutrality in order to meet Habitats Regulations Assessment (HRA) requirements. Work on a water neutrality mitigation strategy has since been progressed, allowing in turn the Local Plan to progress. This updated SA Report covers the additional SA work undertaken in house by Horsham District Council since July 2021, and takes account of the findings of the HRA undertaken by consultants Aecom on behalf of the Council. This additional work has informed the preparation of the Horsham District Local Plan 2023-2040 Regulation 19 (the 'Local Plan'). The ongoing SA work has provided sustainability guidance to the emerging plan as it has been developed.

- 1.5. The SA work undertaken by LUC comprised the following reports (all reports can be read in full on the Council's website <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>):
- Horsham District Local Plan Review Sustainability Appraisal Scoping Report August 2019;
 - Sustainability Appraisal of the Horsham District Local Plan Regulation 19 Consultation Final Report July 2021 (the draft Regulation 19 LUC SA Document);
 - Sustainability Appraisal of the Horsham District Local Plan Regulation 19 Consultation Final Report - Appendices July 2021; and
 - Horsham District Local Plan Sustainability Appraisal Non-Technical Summary July 2021.
- 1.6. Chapter 2 of this report provides a brief summary of the SA / SEA process and regulations together with a narrative of how the requirements of the SEA Regulations have been met. The Chapter also explains how both Health Impact and Equalities Impact Assessments have been used to appraise the emerging Local Plan document.
- 1.7. Chapter 3 sets the sustainability context for development within the Horsham District, including a summary of the policy context, key sustainability issues and existing problems facing the District. The Chapter also presents the Sustainability Appraisal (SA) Framework which has been used to appraise the Horsham Local Plan, together with details on how the Sustainability Appraisal Scoping Report was consulted on in 2019.
- 1.8. Chapter 4 summarises the development of the Local Plan and the SA work undertaken by Land Use Consultants (LUC) between 2019 and 2021. This summary includes an appraisal of five alternative quanta of growth scenarios, six spatial strategy options, 12 large site options and 98 small site options. The LUC Report then also considered twelve alternative spatially specific growth scenarios, which are also summarised in this chapter, together with a narrative to reflect how the Council arrived at its 2021 Preferred Strategy.
- 1.9. Chapter 5 presents in summary form the Sustainability Appraisal of the Horsham District Local Plan Regulation 19 Consultation, Final Report prepared by LUC and published in 2021 (i.e. the draft Regulation 19 LUC SA Document). Since July 2021, some of the draft Local Plan policies have been amended, the assessment of these revised policies is outlined in subsequent chapters as explained below.
- 1.10. Chapter 6 provides a narrative of the Local Plan's evolution post-July 2021 i.e. the publication of a revised National Planning Policy Framework in July 2021 and Natural England's Position Statement on Water Neutrality in September 2021. It covers water neutrality and how this has impacted the development of the Local Plan. The Chapter presents the reasonable alternatives for water efficiency targets in light of the requirements for water neutrality and sets out the results of this appraisal. It also

summarises additional work undertaken by Aecom in respect of HRA and relates this to the SA/SEA updates. (The Council has taken an opportunity to update the previous HRA report to report any legislative updates and ensure the plan adheres to Habitat Regulations.) The HRA will also report the progression made on the Sussex North Offsetting Water Scheme (SNOWS) to mitigate for water neutrality. AECOM has been commissioned to undertake this work.

- 1.11. Chapter 7 summarises the SA of policy amendments made to the Local Plan post July 2021, including the new policy addressing water neutrality. This chapter presents an overview of the decision-making process that has informed the development of the Local Plan's spatial strategy, and provides justification as to why certain sites from the July 2021 Cabinet version of the Local Plan were not recommended for allocation. In summary, the updated Local Plan plans for a reduced amount of new housing compared with the earlier version. This is a direct result of water neutrality, which has reduced the number of homes gaining planning permission to less than 200 per year, thereby removing a significant number from the supply of homes over the whole plan period. A Sussex North Offsetting Water Supply scheme ('SNOWS') is in development which will enable the issuing of permissions to partially recover, however the amount of development year-on-year will be constrained and limited throughout the Plan compared with would have been the case without water neutrality. One of the four strategic sites that had previously been recommended for allocation in July 2021 (Buck Barn) has not been taken forward, with the uncertainties for housing delivery presented by water neutrality being a key factor. There have been some further minor changes to the non-strategic site allocations, and some other policies in the draft Plan have been updated.
- 1.12. The document then goes on to present the cumulative effects of the Plan in Chapter 8 and the monitoring framework and next steps in Chapter 9.

2.0 Background

2.1 The Horsham Local Plan

2.1 The new Horsham Local Plan will run from 2023 to 2040. Its vision is to aim for a place where people from all backgrounds can choose to live and work, in a high-quality natural environment and low carbon economy with access to high-quality jobs, services and facilities that are close to home. This will be a place where:

- The environmental resources and environmental quality of the area have been maintained or enhanced.
- There will be a zero-carbon economy with energy efficient development, which will be adaptable to the impact of climate change and will mitigate these effects.
- The rich heritage and high-quality natural environment is recognised and promoted. Green spaces and the landscape are valued, enhanced, and promoted.
- Horsham Town has retained its unique historical and cultural market town character.
- The District has retained its rural identity maintaining a settlement pattern of separate villages and smaller towns, each with their own distinctive and historic character.
- There are inclusive, vibrant communities with a greater quality and range of services and facilities which are close to homes and areas of work.
- Development which takes place delivers high quality buildings and places with a clear 'sense of place'.
- Non-car-based transport is prioritised to contribute to low carbon-based futures and healthy lifestyles. Transport infrastructure is improved, and IT and communication facilities are well-developed.
- There is a vibrant economy, including creative and knowledge-based industries, and employment which contributes to a low carbon economy. There is a diverse, resilient and flexible range of business premises to match housing growth and offer the opportunity of working close to home.
- New housing has been provided to meet the needs of the District's residents, contribute to wider needs if possible, and provide a range of housing which local people can afford.

2.2 Figure 2.1 shows the Key Diagram for the Local Plan, whilst Figure 2.2 shows the table of contents for the Local Plan.

Figure 2.1: Key Diagram for the Horsham District Local Plan 2023-2040 Regulation 19 (December 2023)

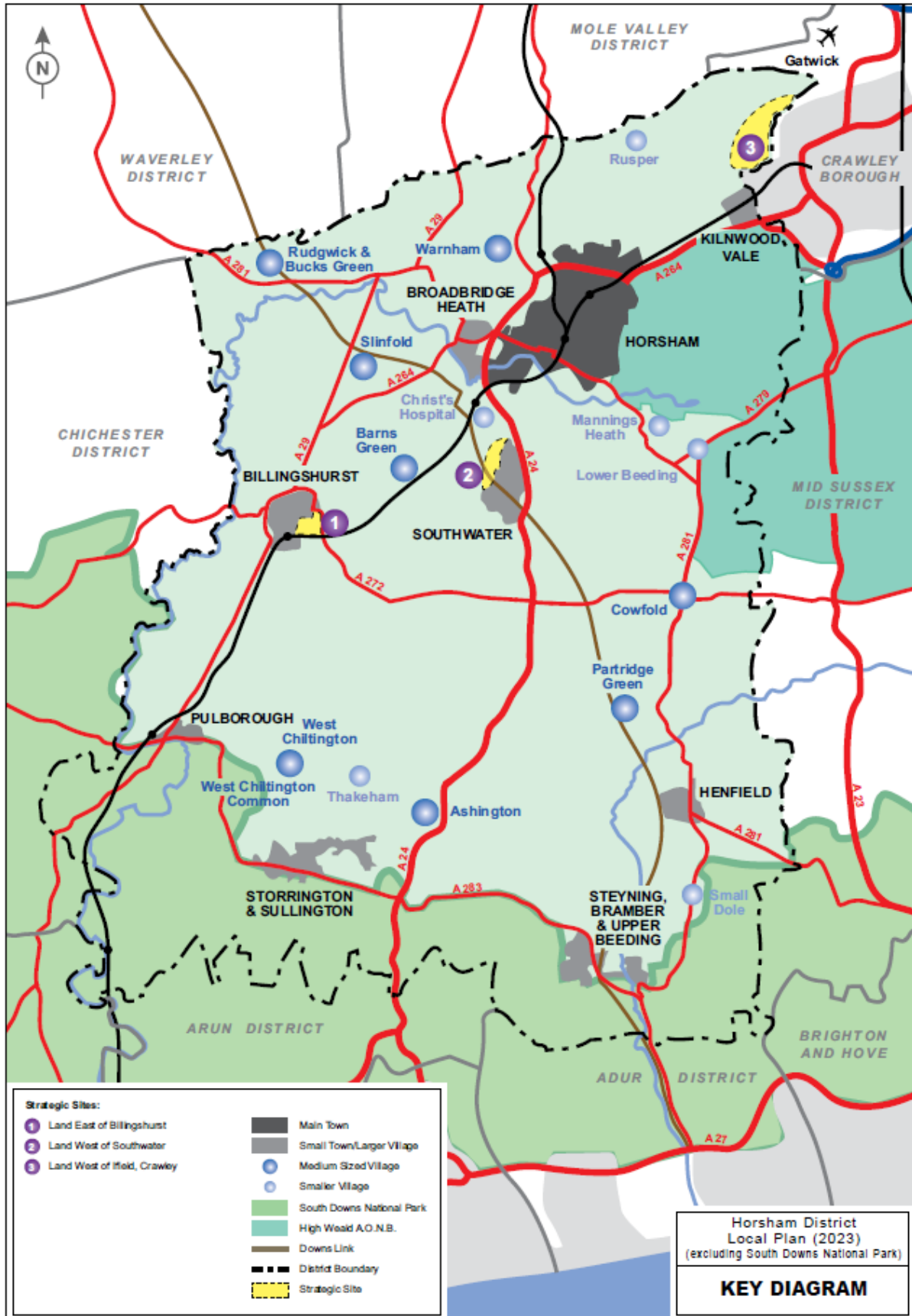


Figure 2.2: Table of contents for the Horsham District Local Plan 2023-2040 Regulation 19 (December 2023)

Chapter 1: Introduction
Chapter 2: Planning Context
Chapter 3: Spatial Vision & Objectives
Chapter 4: Policies for Growth & Change
Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 3: Settlement Expansion
Strategic Policy 4: Horsham Town
Strategic Policy 5: Broadbridge Heath Quadrant
Chapter 5: Climate Change & Water
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design & Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Chapter 6: Conserving & Enhancing the Natural Environment
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 13: The Natural Environment & Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 15: Settlement Coalescence
Strategic Policy 16: Protected Landscapes
Strategic Policy 17: Green Infrastructure & Biodiversity
Policy 18: Local Green Space
Chapter 7: Development Quality, Design & Heritage
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets & Managing Change within Historic Environment
Policy 22: Shop Fronts & Advertisements
Chapter 8: Infrastructure, Transport & Healthy Communities
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Policy 26: Gatwick Airport Safeguarding
Strategic Policy 27: Inclusive Communities, Health & Wellbeing
Policy 28: Community Facilities, Leisure & Recreation
Chapter 9: Economic Development
Strategic Policy 29: New Employment
Strategic Policy 30: Enhancing Existing Employment
Policy 31: Rural Economic Development

Policy 32: Conversion of Agricultural & Rural Buildings to Commercial, Community & Residential Uses

Policy 33: Equestrian Development

Strategic Policy 34: Tourism Facilities & Visitor Accommodation

Strategic Policy 35: Town Centre Hierarchy & Sequential Approach

Strategic Policy 36: Town Centre Uses

Chapter 10: Housing (inc Allocations)

Strategic Policy 37: Housing Provision

Strategic Policy 38: Meeting Local Housing Needs

Policy 39: Affordable Housing

Policy 40: Improving Housing Standards in the District

Policy 41: Rural Exception Homes

Policy 42: Retirement Housing & Specialist Care

Strategic Policy 43: Gypsies & Travellers

Policy 44: Rural Workers Accommodation

Policy 45: Replacement Dwellings & House Extensions in the Countryside

Policy 46: Ancillary Accommodation

Housing Allocations

Strategic Policy HA1: Strategic Site Development Principles

Strategic Site Allocations

Strategic Policy HA2: Land West of Ifield

Strategic Policy HA3: Land North West of Southwater

Strategic Policy HA4: Land East of Billingshurst

Settlement Site Allocations

Strategic Policy HA5: Ashington

Strategic Policy HA6: Barns Green

Strategic Policy HA7: Broadbridge Heath

Strategic Policy HA8: Cowfold

Strategic Policy HA9: Henfield

Strategic Policy HA10: Horsham

Strategic Policy HA11: Lower Beeding

Strategic Policy HA12: Partridge Green

Strategic Policy HA13: Pulborough

Strategic Policy HA14: Rudgwick & Bucks Green

Strategic Policy HA15: Rusper

Strategic Policy HA16: Small Dole

Strategic Policy HA17: Steyning

Strategic Policy HA18: Storrington & Sullington

Strategic Policy HA19: Thakeham (The Street & High Bar Lane)

Strategic Policy HA20: Warnham

Strategic Policy HA21: West Chiltington & West Chiltington Common

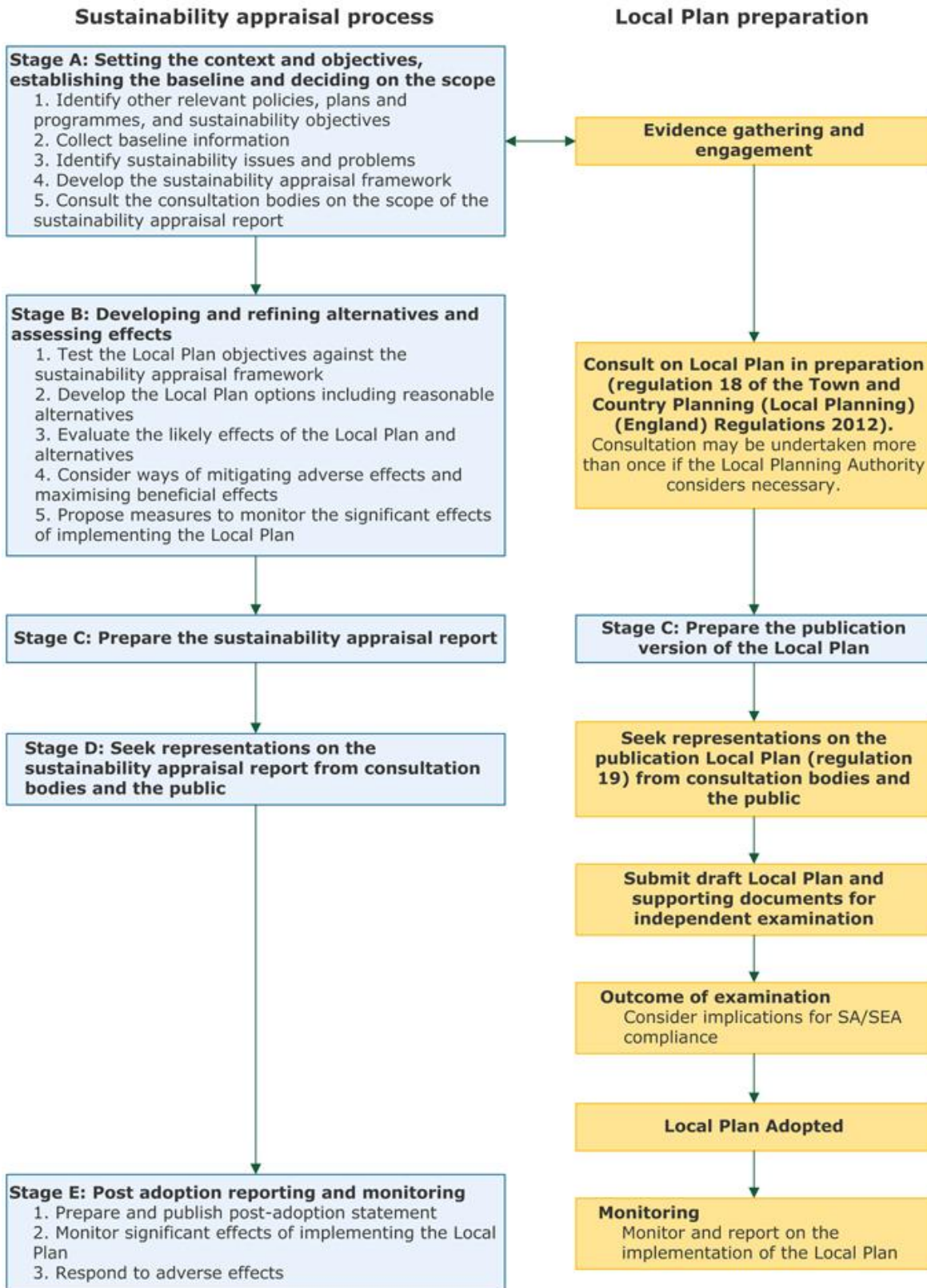
2.2 The SA Process

- 2.3 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to a Sustainability Appraisal (SA). An SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development.
- 2.4 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive¹ transposed in the UK by the SEA Regulations². The SEA Regulations require the formal assessment of plans and programmes that are likely to have significant effects on the environment. The Government advises that a joint SA and SEA process can be carried out by producing a Sustainability Appraisal report that incorporates the requirements of the SEA Regulations.
- 2.5 The SEA regulations remain applicable despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the Local Plan Review to be subject to SA and SEA throughout its preparation.
- 2.6 SEA and SA are separate processes but have similar aims and objectives. Simply put, Strategic Environmental Assessment focuses on the likely environmental effects of a plan whilst Sustainability Appraisal includes a wider range of considerations, extending to social and economic impacts. The Government's Planning Practice Guidance (PPG) shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Horsham Local Plan Review is being undertaken using this integrated approach and throughout this report, the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'. Figure 2.3 summarises the steps in the SA process.

¹ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).

Figure 3: The SA Process



2.3 Meeting the requirements of the SEA Regulations

2.7 Table 2.1 signposts how the requirements of the SEA Regulations have been met within this report.

Table 2.1: Requirements of the SEA Regulations and where these have been met

SEA Regulations requirement	Covered in this report?
Environmental Report	
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <p>implementing the plan or programme; and</p> <p>reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</p> <p>(Regulation 12(1) and (2) and Schedule 2).</p>	<p>This report and the draft Regulation 19 LUC SA Document undertaken by LUC constitutes the 'Environmental Report' accompanying the Horsham District Local Plan 2023-2040</p>
<p>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p>Chapter 3 of this SA Update. Report</p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	
<p>The environmental characteristics of areas likely to be significantly affected.</p>	
<p>Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.</p>	
<p>The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</p>	
<p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <p>(a) biodiversity;</p> <p>(b) population;</p> <p>(c) human health;</p> <p>(d) fauna;</p> <p>(e) flora;</p> <p>(f) soil;</p> <p>(g) water;</p> <p>(h) air;</p> <p>(i) climatic factors;</p> <p>(j) material assets;</p> <p>(k) cultural heritage, including architectural and archaeological heritage;</p> <p>(l) landscape; and</p> <p>(m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</p>	<p>Summarised in Chapters 4 to 8 of this report and explained in full in Chapter 9 of the draft Regulation 19 LUC SA Document undertaken by LUC</p>

SEA Regulations requirement	Covered in this report?
<p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>	<p>Summarised in Chapter 8 of this report and Chapter 9 of the 2021 SA Report undertaken by LUC</p>
<p>An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>	<p>Chapters 5 and 6 of this report and Appendix F of the draft Regulation 19 LUC SA Document undertaken by LUC</p>
<p>A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	<p>Chapter 9 of this report for any additional monitoring requirements identified post 2021.</p>
<p>A non-technical summary of the information provided under paragraphs 1 to 9.</p>	<p>A separate Non-Technical Summary has been prepared to accompany this report</p>
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> • current knowledge and methods of assessment; • the contents and level of detail in the plan or programme; • the stage of the plan or programme in the decision-making process; and • the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. <p>(Regulation 12 (3))</p>	<p>The Environmental Report at each stage of the SA adheres to this requirement.</p>
<p>Consultation</p>	
<p>When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies.</p> <p>(Regulation 12(5))</p>	<p>Focused consultation on the scope and level of detail of the SA was carried out with the Environment Agency, Historic England, and Natural England for five weeks commencing 3rd September 2019.</p>
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</p>	<p>Regulation 18 consultation on the Horsham District Local Plan Review document was undertaken between February and March 2020. Consultation comments received on the Regulation 18 Local Plan and accompanying SA Report were taken into consideration as part of the preparation of the Regulation 19 Local Plan and this SA Report 2021.</p> <p>A period of representation on the Regulation 19 Local Plan document will take place between 19 January 2024 and 01 March 2024. The consultation document is accompanied by this SA Report which forms the</p>

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

2.4 Health Impact Assessment

2.8 Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. It is not a statutory requirement for plan-making. Nevertheless, health issues are addressed through relevant SA objectives (as described in more detail in Chapter 2 of the draft Regulation 19 LUC SA Document) and therefore the HIA process has been incorporated into the SA. Throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of HIA'.

2.5 Equalities Impact Assessment

- 2.9 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.
- 2.10 In fulfilling this duty, many authorities still find it useful to produce a written record of equalities issues having been specifically considered. Therefore, an EqIA Report has been prepared, setting out how the Local Plan is likely to impact the nine protected characteristics identified under the Equalities Act 2010. The EqIA is presented as a separate report to the SA/SEA and HIA findings and can be found as Appendix 3.

2.6 Habitat Regulation Assessment

- 2.11 Appropriate Assessment is required under the Conservation of Habitats and Species Regulations 2017 (as amended), where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other plans or projects.
- 2.12 Horsham District Council appointed AECOM to undertake a Habitats Regulations Assessment of its emerging Regulation 19 Draft Local Plan. The objective of this assessment was to identify any aspects of the Plan that would cause an adverse effect on the integrity of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), potential Special Protection Areas (pSPAs) and, as a matter of Government policy, Ramsar sites, either alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 2.13 An updated HRA Report and Executive Summary will be published at Regulation 19 publication. The HRA has identified or 'scoped in' potential for significant effects on such sites relating to water quantity, level and flow (Arun Valley SAC/Ramsar site); loss of functionally linked habitat (Arun Valley SPA/Ramsar site, The Mens SAC and Ebernoe Common SAC), and atmospheric pollution (The Mens SAC). These have therefore undergone Appropriate Assessment.

Water Quantity, Level and Flow – Arun Valley SAC/Ramsar Site

- 2.14 Natural England has advised that the Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of the Arun Valley sites. As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, Natural England advise that developments within this zone must not add to this impact. The HRA refers to the Water Neutrality Strategy Part C, which recommends that all new development be highly water efficient, and that residual water requirements are offset by reducing the demand for water in existing development.
- 2.15 The HRA concludes that the requirement for any new development within Horsham District demonstrate water neutrality will ensure that no adverse effects on the integrity of the Arun Valley SPA and Ramsar site will result as a result of the Horsham Local Plan and increased water demand.

Loss of functionally linked habitat – Arun Valley SPA/Ramsar site

- 2.16 Some sites proposed for allocation are located within 6.5 km of the Arun Valley SPA/Ramsar site and located within greenfield sites of 2 hectares in size or more, thus being sufficiently large that they may feasibly constitute significant areas of functionally-linked habitat. Whilst these have been scoped in for Appropriate Assessment, the HRA concludes there is low risk of these sites proving undeliverable due to SPA bird issues. Nevertheless the HRA recommends that specific additions are made to allocation policies and relevant supporting text. These changes have been made to the Regulation 19 Local Plan policies and the changes assessed in this updated SA Report.

Loss of functionally linked habitat for The Mens SAC and Ebernoe Common SAC

- 2.17 Some sites proposed for allocation are located either within 6.5km of the Mens SAC or between 6.5km and 12km from both The Mens SAC and Ebernoe Common SAC. As such, they potentially provide functionally linked land to support designated bat populations associated with the SACs. The HRA notes that changes have been made to the supporting text to Strategic Policy 17: Green Infrastructure and Biodiversity to set out the need for full assessment and mitigation of development on sites where there may be an impact on the SACs in respect of bat foraging habitat and/or the severance of commuting flightlines. As such, the HRA concludes that the Local Plan contains a basic policy framework to ensure that no adverse effect on the integrity of the SPA / Ramsar site could result as a consequence of loss of functionally linked land.

Atmospheric Pollution – The Mens SAC

- 2.18 It is considered that The Mens SAC is vulnerable to nitrogen deposition and is located within 200m of an A road likely to be utilised as a journey to work route, particularly for residents of Billingshurst: the A272. As such, traffic modelling has been undertaken to investigate the likely impact of development that may add to vehicle movements. Based on this, the HRA concludes that traffic growth on the A272 over the Local Plan period will not materially interfere with the conservation objective target for this SAC to reduce air pollution to below critical levels and loads. It further concludes that there will be no adverse effect on the integrity of The Mens SAC either alone, or in combination with other plans or projects.

2.7 The SA Work Undertaken by Land Use Consultants Spring 2019 to July 2021

- 2.19 Horsham District Council commissioned Land Use Consultants (LUC) to undertake the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the July 2021 Cabinet version of the Local Plan. This work was undertaken between Spring 2019 and July 2021. The steps are briefly outlined in the following paragraphs:

SA Stage A: Scoping

- 2.20 The SA process started with the production of an SA Scoping Report. The Scoping Report determined what the SA should cover by reviewing a wide range of relevant policy documents, plans and programmes and examining baseline data. This helped to identify the key social, economic and environmental issues are present in Horsham District as well as identify likely future trends.
- 2.21 The review of baseline information helped identify a set of sustainability issues and objectives (collectively referred to as ‘The SA Framework’) which were later used to assess the effects of the Local Plan as it was developed and identify any necessary monitoring requirements moving forward. The full SA Scoping Report prepared by LUC is available at <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base> under the heading ‘Sustainability Appraisal’
- 2.22 Because of the delay between the initial publication of the SA Scoping Report and consultation on the Regulation 19 Local Plan, a review of the baseline information in the SA Scoping Report was undertaken by the Council in October 2022 to capture any

factual updates, update trends and identify new issues including Water Neutrality. More detail on water supply and resources in respect of the natural environment was included as a result of this. The updated Baseline information is available as Appendix A to this document, while a summary of this information is included in **Chapter 3**. The SA Framework that has been used throughout the plan making process is presented in **Chapter 4**.

SA Stage B: Developing and refining options and assessing effects

- 2.23 Developing options for the plan was an iterative process, involving a number of consultations with the public and stakeholders. Consultation responses and the SA helped to identify 'reasonable alternatives' to the options being considered for the plan policies and site allocations identified. The reasonable alternative options that were considered for the Horsham District Local Plan included alternative policy approaches and potential sites for new housing development.
- 2.24 To understand the sites that were available for housing development, the Council held a 'Call for Sites' exercise in 2018 and updated the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) which was published in 2019. The sites promoted ranged in scale from development of 5 homes up to large scale development of several thousand homes. Sites were subsequently assessed by the Council with regards to their suitability, availability and achievability for development against a set of detailed Site Assessment Criteria to ensure a consistent approach.
- 2.25 In August 2019, the Council provided LUC with high-level options for quanta of growth, as well as a number of spatial strategy options for appraisal. A number of potential large and small site allocation options were also provided for appraisal. These sites were sites that were considered reasonable alternatives for allocation as they were assessed as meeting key sustainability or delivery criteria.
- 2.26 LUC undertook the appraisal of these various options (i.e. quantum of growth options, overall spatial strategy options and large sites options) and the initial findings were published in September 2019. Further SA work followed relating to small site options and growth scenario options. A summary of these findings can be found in **Chapter 4** of this Report. Given their overarching nature and implications for housing supply and economic growth, as well as where this growth is to be located over the plan period, these elements of the Local Plan comprise its most important elements and the focus of the SA work on reasonable alternatives.

Regulation 18

- 2.27 The first stage in production of the new Local Plan comprised a review of the adopted Horsham District Planning Framework (HDPF) policies, together with the preparation of key evidence base documents to inform the likely content of the revised Local Plan. This process commenced with an Issues and Options consultation held in 2018. This initial consultation focussed on the economy and rural matters.

2.28 The scale of housing growth to be accommodated in the District, together with potential locations for strategic scale development, formed the basis of the Council's further Regulation 18 consultation held in January-March 2020. This consultation was accompanied by the Horsham District Council Regulation 18 Interim Sustainability Appraisal ('Interim SA') which summarised the appraisal process undertaken to date and consisted of the following documents:

- Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan (LUC, February 2020) ('Interim SA of Strategic Sites and Growth Options') – this includes an appraisal of potential smaller site allocations
- Interim Sustainability Appraisal of Horsham District Local Plan (LUC, February 2020) ('Interim SA of Smaller Sites and Policies')
- Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan (Non-Technical Summary) (LUC, February 2020) ('Interim SA Non-Technical Summary')

2.29 These documents now have archive status but are available at <https://strategicplanning.horsham.gov.uk/consult.ti/LocalPlanReview/consultationHome>).

2.30 The Interim SA considered a range of reasonable alternatives with respect to the overall development strategy, including housing numbers and sites to be allocated. For many of the policies that were not allocating sites, the alternative would be to include no policy or a policy that would be contrary to the NPPF, with no obvious exceptional circumstance to justify a departure. Due to this approach, the Council considered that there were not genuinely reasonable alternatives for many non-site specific policies within the Local Plan, therefore the SA work for these focussed on their potential effects compared with a business-as-usual scenario.

2.31 Feedback from consultation on the Interim SA, along with the evidence base that was continuing to be gathered, helped to inform the preparation of later drafts of the Regulation 19 Local Plan and the Sustainability Appraisal Report.

SA Stage C: Preparing the Sustainability Appraisal Report

2.32 Following consultation on the Regulation 18 draft Local Plan in January-March 2020, the council continued its evidence gathering and reviewed consultation responses. This information was fed into the preparation of the full SA Report accompanying the July 2021 Cabinet version of the Local Plan (the 'draft Regulation 19 LUC SA Document'). This report summarised the SA work carried out during the earlier stages of Local Plan preparation, including the consideration of reasonable alternatives, the appraisal of the

preferred sites, the overall spatial strategy, growth scenario options and the appraisal of policies. Likely significant effects, both positive and negative, the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects were also presented.

- 2.33 The draft Regulation 19 LUC SA Document also included an update to the appraisal work undertaken at Regulation 18 stage in relation to options for the quantum of growth (i.e. how much growth could be accommodated in the plan area), large site options and growth scenario options (which consider different reasonable alternative combinations of how growth might be distributed in the plan area). A summary of this work is included in Chapter 4 of this Report.

Regulation 19 Draft Preferred Strategy

- 2.34 The progress of the Regulation 19 Local Plan preparation was impacted by two key events that necessitated further work to ensure compliance with tests of soundness and legal compliance. These are outlined below.

Revised National Planning Policy Framework (NPPF), July 2021

- 2.35 Horsham District Council were seeking to publish the July 2021 Cabinet version of the Local Plan in September 2021. At the meeting of Cabinet on 15th July 2021 it was recommended that the draft Local Plan be considered by Council on 28th July 2021. However the Government published a revised National Planning Policy Framework (NPPF) on the 20th July which had an impact on policies in the emerging plan. The revised NPPF, required that Council's allocating strategic sites for development take account of a 30 year vision. The Council had grounds to believe that the revisions to the NPPF were so significant in relation to the Local Plan, that further work would need to be undertaken to ensure compliance with the revised NPPF requirements relating to the 30 year vision.
- 2.36 In order to carry out the necessary additional work, it was decided to delay the consideration of the Local Plan, in order to incorporate these changes. LUC carried out work to address the NPPF revisions and this fed into the Council's preparation of the current (December 2023) version of the Local Plan.

Natural England Position Statement on Water Neutrality

- 2.37 On 14th September 2021, whilst preparing the revised Regulation 19 Local Plan, the Council received a Position Statement from Natural England informing the Council that information collected by Natural England showed that water abstraction for drinking water supplies may be having a negative impact on the wildlife sites in the Arun Valley. Natural England advised that any new development taking place in the area must not add to this negative impact. The Position Statement can be found on the Council's website at <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/position-statement>. As well as applying to the whole of Horsham District, the Position Statement also affects a large part of Crawley Borough, parts of Chichester District and Mid Sussex District, and parts of the South Downs National Park which similarly fall within the Southern Water Sussex North Water Resource Zone.
- 2.38 The Position Statement further advised that in order to comply with the requirements of the Habitat Regulations 2017, the Local Plan must demonstrate that any new development will not exacerbate the current situation. To achieve this, development in the Local Plan must be water neutral – in other words, new development should not increase the rate of water abstraction above current levels.
- 2.39 Since September 2021 the affected Local Authorities have worked together to produce a Water Neutrality Study. The final part of this, published in December 2022, outlines a strategy to achieve water neutrality within the Sussex North Water Resources Zone, and can be found on the Council's website at [https://www.horsham.gov.uk/data/assets/pdf_file/0004/120397/EYP-JBAU-XX-XX-RP-EN-0004-A1-C02-Water Neutrality Assessment Part C.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0004/120397/EYP-JBAU-XX-XX-RP-EN-0004-A1-C02-Water%20Neutrality%20Assessment%20Part%20C.pdf). The strategy that has been developed to achieve water-neutral local plans forms a key piece of evidence that has informed the preparation of the Horsham District Local Plan. In particular it demonstrates a significant impact on the quantum of development that is able to be delivered without generating a significant adverse impact on the Arun Valley habitats. The outcomes from this work have therefore been incorporated in the updated sustainability appraisal process as set out in later chapters of this document.

3.0 Scoping: Sustainability Context for Development in Horsham District

- 3.1 This section summarises the findings of the SA Scoping Report, prepared by LUC in August 2019. For the reasons identified in para 2.23 the baseline information in this section has been updated beyond the information presented by LUC to take into account any factual updates that have taken place post 2019. These include the most recent updates which were undertaken by the Council up to and including October 2022. The original SA Scoping Report prepared by LUC is available at <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base> under the heading 'Sustainability Appraisal'. The full updated Baseline Information section is included in **Appendix A**.

3.1 Stage A1: Policy Context

- 3.2 Schedule 2(1) of the SEA Regulations requires the SA to report upon the contents and main objectives of the plan or programme, and of *"its relationship with other relevant plans and programmes"*. This section sets out the policy context within which the Local Plan must operate in relation to the various sustainability themes covered by the SA.

Key International and National Plans, Policies and Programmes

- 3.3 A wide range of national and international legislation and policies relate to issues such as water quality, waste and air quality. Those which are of most relevance for the Local Plan and SA are provided in Appendix B of the draft Regulation 19 LUC SA Document 2021.
- 3.4 The most significant national policy context for the Local Plan Review is the National Planning Policy Framework (NPPF). The most recent update to the NPPF (July 2021) places an increased focus on design quality, and also requires Local Plans which are allocating strategic scale sites to consider the context of a 30 year timescale:

"Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery."

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

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

3.6 The Framework places a focus on making ‘beautiful’ and ‘sustainable’ places. The use of plans, design policy, guidance and codes is encouraged. The NPPF specifically promotes well-designed places and development, and plans should “at the most appropriate level, set out a clear design vision and expectations.”

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

3.8 The NPPF also states that:

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

Neighbourhood Plans

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

3.10 Neighbourhood Plans must be consistent with the requirements of the NPPF and be in ‘general conformity’ with the Local Plan for the area. Neighbourhood Plans should not promote less development than set out in the strategic policies in a Local Plan covering the neighbourhood area or undermine those strategic policies. Within this context, Neighbourhood Plans typically include policies to deliver:

- Site allocations for small and medium-sized housing.
- The provision of infrastructure and community facilities at a local level.
- Establishing design principles.

- Conservation and enhancement of the natural and historic environment

- 3.11 Once 'made', Neighbourhood Plans form part of the statutory development plan for the district or borough within which they are located.
- 3.12 There are currently 24 designated neighbourhood plan areas within Horsham District (including one designated neighbourhood forum for the Unparished Area of Horsham town; i.e. the Horsham Blueprint Business Neighbourhood Forum).
- 3.13 Neighbourhood Plans have been 'made' for Nuthurst (October 2015), Thakeham (April 2017), Shermanbury (June 2017), Woodmancote (June 2017), Slinfold (June 2018), Warnham (June 2019) and Storrington, Sullington and Washington (September 2019). In June 2021 Horsham District Council made 10 further neighbourhood plans: Billingshurst, Bramber, Henfield, Rudgwick, Rusper, Shipley, Southwater, Upper Beeding Parish and West Grinstead Parish. Steyning Neighbourhood Plan was made in September 2022 and the Horsham Blueprint Business Neighbourhood Plan was made in December 2022.
- 3.14 Neighbourhood Plans for the remaining designated neighbourhood plan areas at a late stage of the process are Cowfold, Itchingfield, Lower Beeding and Pulborough, whilst West Chiltington Neighbourhood Plan is also in preparation.

Local Plans in adjoining local authorities

- 3.15 Development in Horsham District will not be delivered in isolation from those areas around it. New development and supporting infrastructure can have effects across administrative boundaries. As such it will be important to consider the cumulative effect of delivering new development with consideration for growth being proposed in neighbouring authority areas. Table 3.1 shows the local authorities bordering Horsham and key points about their plans.

Table 3.1: Neighbouring authorities' Local Plans

Neighbouring Local Authority	Plan Period	No. net dwellings	Ha. employment land	Notes
Adur	2011-2032	3,718	4.1	Adopted 14 th December 2017 Currently being reviewed – Reg. 18
Arun	2018-2031	20,000	74.5	Adopted July 2018 Currently being reviewed – Reg. 18
Chichester	2014-2029	7,388	16	Adopted Plan however Plan review currently at Proposed Submission. New Plan Period 2021-2039
Crawley Borough	2024-2040	5,320	35	Currently undergoing examination
Mid Sussex	2014-2031	16,390+	543 jobs/yr	Adopted Plan however Plan review at Proposed Submission as of Jan 2024. New Plan period 2021-2039
Mole Valley	2020-2037	6,000+ (less than its assessed housing need)		Currently undergoing examination (paused pending NPPF 2023 publication)
South Downs National Park Authority	2014-2033	4,750	10.3	Currently being reviewed – early stages
Waverley	2018-2032	11,210	1.6	WBC has agreed a comprehensive update which is pending

Other Relevant Information Relating to Water Neutrality

3.16 Following publication of the Position Statement by Natural England, a further update of the relevant plans, policies and programmes impacting the District was required, with a closer look at Water Neutrality. The key documents relating to this matter are listed below and they have been considered when updating the baseline information on water neutrality:

- The Conservation of Habitats and Species Regulations 2017
- Environment Act 2021
- National Planning Policy Framework, DLUHC (2021)
- Sussex North Water Neutrality Study: Part C – Strategy, JBA Consulting (November 2022)
- Water Neutrality Study Part B: In Combination, JBA Consulting (26 April 2022)
- Natural England Position Statement, Natural England (14 September 2021)
- Water Neutrality Study Part A: Individual Local Authority Areas (Crawley and Chichester) JBA Consulting (July 2021)
- Horsham Local Plan Water Neutrality Technical Note, Aecom (July 2021)
- Water Cycle Study – Crawley Addendum, JBA Consulting (January 2021)
- Gatwick Sub-Regional Water Cycle Study, JBA Consulting (August 2020)
- Securing a resilient future for water in the South East: Our Water Resources Management Plan for 2020-70, Southern Water (December 2019)

3.2 Stage A2: Sustainability Context

3.17 The following paragraphs present a short summary of the baseline information that fed into the preparation of the Local Plan. The baseline information in the SA Scoping Report was reviewed in October 2022 to capture any factual updates, update trends and identify new issues including Water Neutrality. Appendix A of this report presents the full update to the baseline information including references as to where the information was obtained.

Population Growth, Health and Wellbeing

3.18 Between 2011 and 2021, the population of Horsham District grew from 131,300 to 146,800 people, an increase of almost 12%. The number of households also increased over the same time period by 7,500. The resident population has an older age profile compared with England; 23% of the population of Horsham District are aged 65 and over compared to 18% of the population of England. There has been a 30% increase in

people aged over 65 years in Horsham District between 2011 and 2021. 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.

- 3.19 House prices are higher in Horsham compared to the West Sussex average and the national average. In 2018, of the 2,370 properties sold in Horsham only 1 in 4 was less than £300,000. In 2014, 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%). Furthermore, the property price to earnings ratio in Horsham District has increased threefold in the twenty-year period ending in 2021.
- 3.20 The predominant house size in Horsham is three bedrooms and these types of properties account for 37% 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. As of 1 April 2021, there were 778 households on the Council's social housing register, an increase of 270 households since April 2015. Horsham has a relatively high number (89%) of residents living in private housing as opposed to public housing. This proportion is greater than the national average of 83%. 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. In 2021, 14.5% of Horsham households rented privately. This figure increased from 11.8% in 2011.
- 3.21 In October 2023 the district had 142 recorded gypsy and traveller pitches. The Gypsy and Traveller Accommodation Assessment suggested that between 2023 and 2040 there will be a need for an additional 77 pitches.
- 3.22 Horsham District falls within the 50% of least deprived areas in the country. As reported up to September 2022 the District has a lower proportion of residents (2%) who receive Universal Credit than at the regional (2.9%) and national level (3.7%), although this figure has risen since 2019 by 1%. In 2020 it was estimated that 6.9% of households were classed as being fuel poor, a slight reduction from 7.6% in 2016.
- 3.23 The 2021 Census statistics suggest that health in the District is reasonably good with 86.5% of the population reporting themselves to be in very good, or good health. Some 10.2% state they are in fair health, with only 2.5% and 0.7% in bad or very bad health respectively. The health of the District has improved since the 2018 estimates. Average life expectancy in Horsham is slightly above the national average: 82.5 for males and 85.1 for females. Estimated levels of adult excess weight are similar to the national

average of 62%, with an average of 61.1% for Horsham. In 2021, Horsham had a slightly lower percentage of physically active adults than the West Sussex average.

- 3.24 Horsham contains over 400 hectares of greenspace, including 53 play areas which are managed by the Council. The High Weald 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 villages. The South Downs National Park to the south of the District provides access to other important elements of green infrastructure for many residents. In addition, the overall quality, quantity and accessibility of existing leisure and recreation facilities in the District is good. There are however, some shortages in open space and leisure provision, including parks and gardens, amenity greenspace, children’s play provision and allotments.

Economy

- 3.25 Horsham sits at the heart of the Gatwick Diamond, an economic partnership consisting of the local authorities surrounding Gatwick Airport which is one of the strongest local economies in the UK. Horsham is also part of the Coast to Capital LEP, the seventh largest economy in the UK. The future projected growth to Gatwick Airport is likely to have an influence on employment opportunities accessible to the residents of Horsham as the airport is planning to accommodate growth in air traffic by bringing the Northern Runway into regular use. A Development Consent Order application for this was accepted by the Planning Inspectorate in August 2023.
- 3.26 Horsham town is the main urban area in the District and supports a range of employment opportunities. Whilst the town benefits from an active and engaged local community, the town centre has been noted to have weaknesses in terms of the size of retail units which the town’s historic buildings can provide for occupiers. In recent years much of the office stock in Horsham town centre has been lost to residential use through the prior approval process. A demand for modern office space has been identified in Horsham Town Centre and there remains demand for B uses across Horsham District. The decline of British High Streets is reported to be increasing; however, this is a trend which is being experienced across the UK. The growth of e-commerce and changes in consumer habits have greatly influenced this trend.
- 3.27 Horsham District’s economically active population was 85.6% in the year ending in June 2022, higher than the national and regional figure. Wholesale and retail trade makes up the largest industry in the District with 17.9% of the working population employed in this industry. 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. Compared to the other local authorities in West Sussex, Horsham has

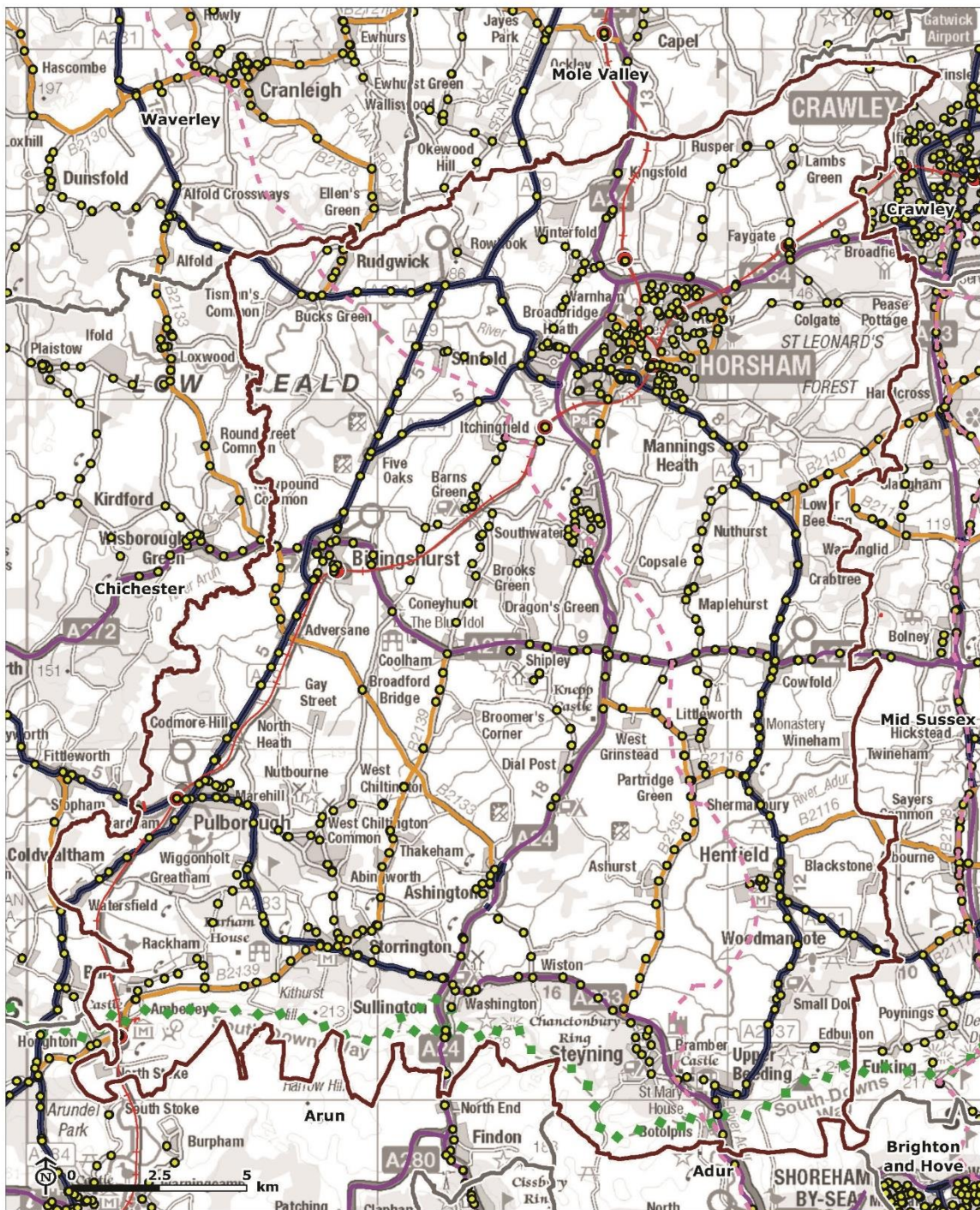
the greatest net imbalance of commuters (-10,126). Workers commute out to Crawley, Mid-Sussex, London and Brighton and Hove. These patterns are influenced by Horsham's strong transport links to some of these surrounding areas.

- 3.28 In regard to unemployment, in 2016 the rate of claimants in the District was 6.0%, lower than both the regional and national average. There has been a rise across all age categories in terms of the number so people receiving Job Seekers Allowance, however 18- to 24-year-olds are more likely to be claiming this benefit than older people.
- 3.29 In relation to the visitor economy, 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. In 2016, the number of day visitors to the District was recorded as 2,870,000, bringing in a value of £88,970,000. The figures recorded for the District for these indicators perform well when compared to the South East and England.

Transport Connections and Travel Habits

- 3.30 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. 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 at the Washington Roundabout by the boundary of the South Downs National Park. Figure 3.1 shows the key transport links in Horsham District.
- 3.31 In 2011, over 45% of residents used a private vehicle to get to work, while only 7% of residents used public transport. Levels of home working are likely to have increased as a result of the Covid-19 Pandemic as hybrid working has become more common; this will have impacted on travel to work patterns in the District.
- 3.32 Rail services pass through the District connecting London to the south coast, with stations accessible in Horsham town and a number of smaller towns including Pulborough and Billingshurst. Due to the rural nature of the District some rail commuters use private vehicles to access stations outside of the District at Shoreham and Haywards Heath. Capacity issues on railways in the South East are expected to increase substantially, with a 115% increase by 2043. There is limited capacity on the network to operate additional services.
- 3.33 A number of cycle networks operate through the District, with the Downs Link (Route 223 of the National Cycle Network) connecting the north of the District at Rudgwick south through to Southwater and onto Steyning and the south coast.

Figure 3.1: Transport Links in Horsham District



- Horsham
- Neighbouring authority
- Bus stop
- Railway station
- + Railway
- A road
- B road
- Primary road
- ◆ National Trail
- - - National Cycle Route

Source: OS, NaPTAN, Natural England, Sustrans

Map Scale @ A4: 1:155,000

Horsham District Council
Sustainability Appraisal



Horsham
District
Council

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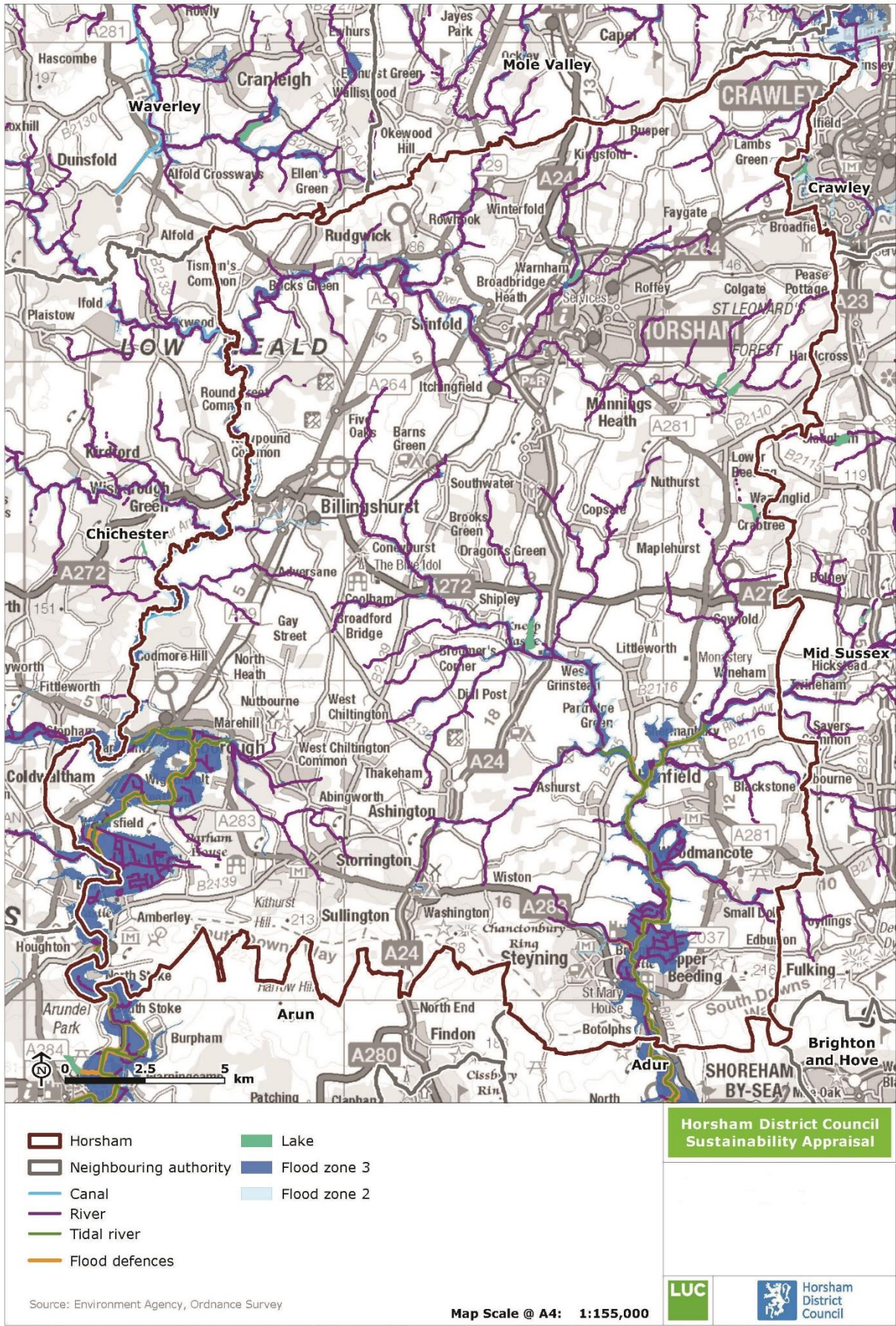
Air, Land and Water Quality

- 3.34 Horsham District is situated in an area of serious water stress, as identified by the Environment Agency Water Stressed Areas Classification. The whole of the District is within the Sussex North Water Supply Zone, where groundwater abstraction may be having an adverse effect on a number of environmentally designated sites. Natural England have indicated that development should not add to the adverse impact. A way of achieving this is for all new development to demonstrate water neutrality.
- 3.35 A number of rivers and their smaller tributaries flow through Horsham District, including the River Adur and the River Arun. Both river catchments contain water bodies classified as bad by the Environment Agency, mainly due to pollution from rural areas and physical modifications.
- 3.36 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. Increase in road travel in the District is in line with national trends.
- 3.37 Levels of nitrogen dioxide (NO₂) have regularly exceeded the UK and EU air quality standards at Storrington and Cowfold: Horsham District Council has declared these as Air Quality Management Areas. In addition, there are AQMAs in Crawley, Horley, and Hassocks near Horsham's administrative boundary which will impact on the District's air quality. Although NO₂ concentrations have been decreasing over time, development in the District is likely to have exacerbate air quality issues.
- 3.38 Most of Horsham's agricultural land is Grade 3, with small areas of Grade 2 and Grade 4. Most of the District is designated by West Sussex County Council as mineral safeguarding areas covering brick clay, soft sand, and chalk. There are a number of mineral extraction and infrastructure sites in the District, as well as land areas classed as contaminated due to previous uses as landfill sites, sewage treatment works, and industrial sites.
- 3.39 55% of total household waste generated in the District was recycled in 2020-21, exceeding the target of 50% set by the Council for 2020. Horsham is currently exploring a strategy to introduce food waste collections, which will increase pressures on services to process waste in the District. Non-recycled household waste is currently taken to a landfill site at Brookhurst Wood. There are also two sites allocated in the District for waste processing facilities, both at Brookhurst Wood.

Climate Change Adaptation and Mitigation

- 3.40 Summer temperatures could be up to 5.1°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 45% in this scenario. Winters could be up to 3.8°C warmer, with up to 39% more rainfall by 2070, with the greatest warming in the South East. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. Within the South East, water supplies have been identified as being under pressure. This is expected to be exacerbated as a result of climate change. Areas of the District are at additional risk of flooding with wetter winters; Pulborough, Steyning and Upper Beeding are identified as settlements most at risk. A further impact of climate change will be on biodiversity, and the type of species and habitats in the District. However, they will also provide a crucial role in delivering climate change mitigation and adaptation. Figure 3.2 shows the flood risk across Horsham.
- 3.41 Total greenhouse gas emissions for the West Sussex fell between 2018 and 2020, with domestic greenhouse gas emissions for Horsham also falling within the same time period. Regardless, in 2020 Horsham had the second highest total and per capita greenhouse gas emissions in the County, although this rate is decreasing. The transport sector accounts for the largest amount of greenhouse gas emissions in Horsham.

Figure 3.2: Flood risk in Horsham District



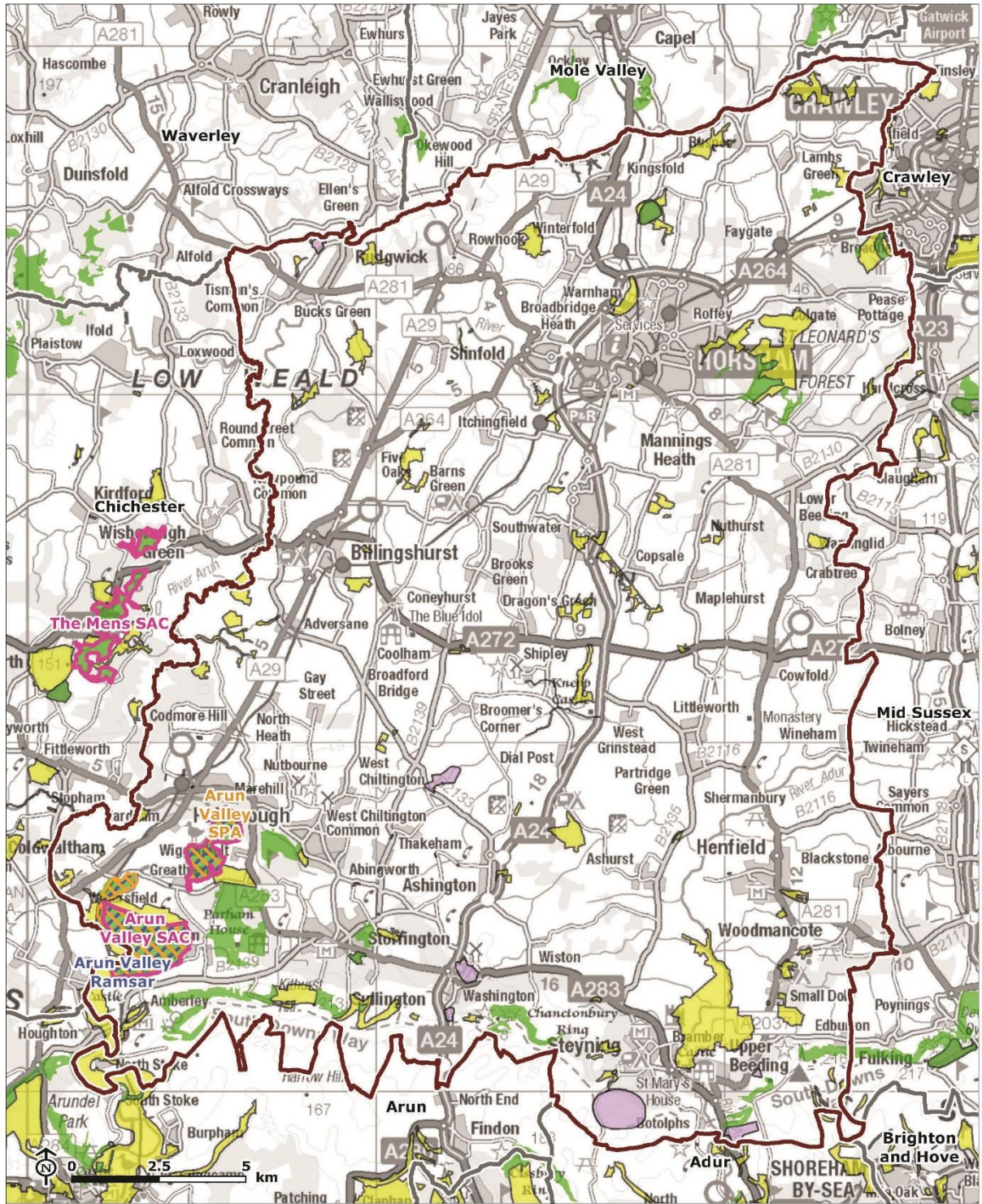
Source: Environment Agency, Ordnance Survey

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Biodiversity

- 3.42 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) in respect of rare species susceptible to changes in water quality and water levels. 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. Of the 23 Sites of Special Scientific Interest (SSSI) 49.3% are in an unfavourable but recovering condition and 6.8% are in declining condition. There are also 70 locally important Local Wildlife Sites (LWSs) (previously called SNCIs) and 22 Regionally Important Geological Sites (RIGS) as designated by WSCC. 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. Figure 3.3 shows the designated biodiversity and geodiversity sites in Horsham District.
- 3.43 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. Other species are not protected by law but are of biodiversity importance at a national or countywide scale, for example swifts. A number of Biodiversity Opportunity Areas have been identified where there is potential for biodiversity to be improved. Going forward, sites of biodiversity importance or with high potential to enhance ecological networks will be developed through a Local Nature Recovery Strategy.

Figure 3.3: Biodiversity and geodiversity in Horsham District



- Horsham
- Neighbouring authority
- Ramsar
- Special Protection Area
- Special Area of Conservation
- Site of Special Scientific Interest
- Local Wildlife Site
- Local Geological Site

Source: Horsham District Council, Natural England

Map Scale @ A4: 1:155,000

Horsham District Council Sustainability Appraisal



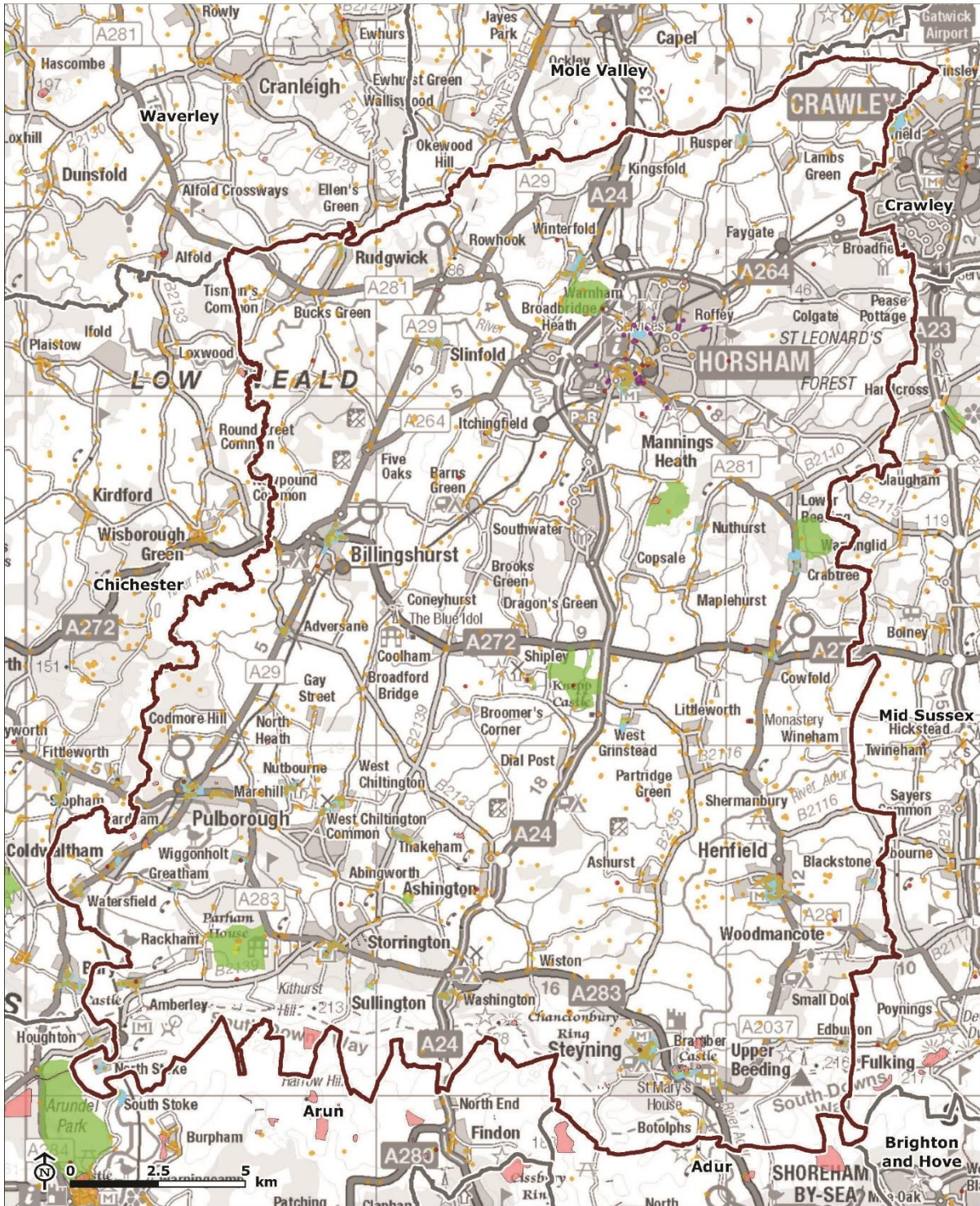
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Historic Environment

- 3.44 Horsham retains a traditional settlement pattern of small hamlets and villages that are served by larger market towns. There are over 1,860 Listed Buildings in the District together with 37 Conservation Areas, 77 Scheduled Ancient Monuments and 252 sites of archaeological interest. 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. Twelve of the Conservation Areas have adopted character statements. A small number of heritage assets in Horsham have been placed on the national 'Heritage At Risk' Register compiled by English Heritage. Horsham has the second highest number of assets on the Heritage at Risk Register in West Sussex, after South Downs National Park.

Figure 3.4: Historic Environment in Horsham District



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

Source: Historic England, Horsham DC

Map Scale @ A4: 1:155,000

**Horsham District Council
Sustainability Appraisal**

LUC

Horsham
District
Council

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CB:KS EB:Stenson_K LUC FIG9_1_10660_Historic_Environment_A4P 31/05/2019

Landscape

3.45 Much of the north-eastern part of the District is designated as the nationally important High Weald Area of Outstanding Natural Beauty (AONB) and south of the District adjoins the South Downs National Park. The rural nature and settlement pattern of the District create a skyline of church spires and windmills in much of the western parts of the District. The north-east in comparison contains major transport corridors connecting urban areas, which influences parts of Horsham town. The Horsham District Landscape Character Assessment 2003 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. Areas which have been identified as less sensitive to development include those areas where urbanising influences had already affected the landscape, including around Gatwick Airport and Brookhurst Wood.

3.3 Stage A3: Summary of Key Sustainability Issues and Problems

3.46 The baseline information in the SA Scoping Report 2021 and subsequent review of this information in October 2022 (Appendix A) provides detailed information about the key sustainability issues in the Horsham District. The main issues are:

- The entire District is in a zone of **high water stress**. Several of the District's biodiversity sites are at risk from this. This is a significant constraint on the plan.
- Horsham's **ageing population** will require specialist services and facilities.
- Horsham has **high house prices** in Horsham, and the delivery of affordable housing is much lower than the need identified.
- A **deficiency in recreational/open space** provision has been identified in a number of specific areas including provision for children and young people's play whereby provision is only around 13% of what it should be. Similarly for allotments, there is a shortfall of around 11 hectares according to national standards.
- Horsham has a significant **net outflow of commuters**, due to its rural nature and proximity to employment centres (e.g. Crawley, London).
- **E-retailing and online services** are affecting the economy of Horsham town centre, and town and village centres.
- A large proportion of the District's residents **drive to work**, with associated environmental and social impacts.

- Parts of the highway network in the District experience **high levels of congestion and delays**. Rail capacity is also currently stretched, and capacity pressures on London services are expected to increase.
- Some areas have only **limited bus services** and other public transport links.
- **Air Quality Management Areas** have been designated at Cowfold, Storrington, Hassocks, and near the north-eastern edge of the District at Horley and Crawley.
- Some of the District’s water bodies have **‘bad’ or ‘poor’ ecological status**. Some areas of the District are covered by a Source Protection Zone.
- While average energy consumption of Horsham residents has fallen in recent years, the District still has the second **highest per-capita CO2 emissions** in the County.
- The main source of **flooding** in the District is from rivers (fluvial). Climate change is expected to result in more extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought).

3.47 Table 3.2 provides an outline of the likely progression of the key issues without the implementation of the Local Plan Review. These issues were updated following a review of the baseline data undertaken in 2022. The original assessment of key sustainability issues identified by LUC can be found in the draft Regulation 19 LUC SA Document.

Table 3.2: Likely progression of key issues without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
<p>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.</p>	<p>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.</p>	<p>SA objective 2</p>
<p>House prices in Horsham are high comparable to the regional and national average. The level of socially rented housing which is currently provided in the District is also</p>	<p>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</p>	<p>SA objective 1</p>

<p>significantly lower than the regional and national level. As a whole, the delivery of affordable housing is considerably lower than the need identified and there are a high number of residents currently on the waiting list for this type of provision. There is also continued need in the District for housing suitable for the elderly, families and the Gypsy and Traveller community.</p>	<p>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.</p> <p>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.</p>	
<p>Horsham is one of the least deprived local authorities in the UK. However, there are disparities between the least and the most deprived areas in Horsham. A number of wards are within 40% of the most deprived in the UK.</p>	<p>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.</p>	<p>SA objective 1 SA objective 2 SA objective 3 SA objective 5</p>
<p>Health in Horsham is generally recorded as being at reasonably good level or higher. However, levels of obesity and excess weight in the District are slightly above the national average. Furthermore there are inequalities displayed</p>	<p>The topic of health is intertwined with many policies throughout the current HDPF. This includes Policies 40, 42 and 43 which seek to encourage active modes of transport, create socially inclusive and adaptable environments and provide new or improved community facilities or services. However, without the Local Plan Review policies will be less suitable to help prevent any continued</p>	<p>SA objective 2 SA objective 3 SA objective 5 SA objective 14</p>

<p>between the most and least deprived areas of the District in terms of health.</p>	<p>rise in levels of obesity in the District, although national campaigns may work to reduce this. The Local Plan Review could further contribute to tackling obesity through policies that more appropriately seek to encourage uptake of active modes of transport and access to green space and other recreation opportunities. The Local Plan Review also presents an opportunity to address health deprivation in the District by supporting the provision of healthcare facilities and other relevant improvements at areas of most need.</p>	
<p>Horsham provides access to a number of important areas of open space and green infrastructure. This includes South Down National Park to the south and High Weald AONB to the north east. A deficiency in recreational or open space provision has been identified in a number of specific areas including provision for play and allotments. There is also potential for new development to result in loss of access to open spaces and elements of green infrastructure as well as impacts upon their quality.</p>	<p>Policies 31, 32, 42 and 43 in the HDPF seek to support the appropriate maintenance and provision of new green infrastructure, open spaces and services and facilities for residents. However, without the Local Plan Review there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas will remain limited. The Local Plan Review offers the opportunity to better address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space and services and facilities. The review process will also allow for new local green spaces to be planned and incorporated alongside new development.</p>	<p>SA objective 2 SA objective 7</p>
<p>In general Horsham is a relatively safe District in which to live. In recent years however certain types of crime such as violent crime, weapon use and illegal drug use have increased in the District.</p>	<p>Policy 33 of the HDPF sets out design principles for new development in the District and these include the incorporation of measures to reduce opportunities for crime. This policy would remain in place in the absence of the Local Plan Review. The Local Plan Review however presents an opportunity to build on the requirement of this policy to encourage aims to make the local environment and streets safer, for example through relevant approaches to 'designing out' crime. Any new policy would make a contribution to achieving this aim alongside other local and national measures.</p>	<p>SA objective 4</p>
<p>Horsham is generally seen to be an economically affluent area and the area has a higher average wage than the national average. It forms part of the Gatwick</p>	<p>It is uncertain how the job market will change without the implementation of the Local Plan Review. Policies 7, 9, 10 and 11 of the HDPF seek to ensure the growth of new economic and employment opportunities including those for tourism and</p>	<p>SA objective 3 SA objective 16 SA objective 17</p>

<p>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, and London and Brighton and Hove further afield means that the area sees a significant net outflow of commuters. Horsham needs to ensure a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and issues of deprivation are tackled. This is of particular relevance considering the negative net commuting flow which the District experiences.</p>	<p>rural employment and to protect existing Key Employment Areas. Furthermore Policy 39 addresses the provision of new infrastructure to meet new needs of development including employment growth. However, the Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of new employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.</p>	
<p>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.</p>	<p>The HDPF through Policies 12 and 13 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.</p>	<p>SA objective 3</p>
<p>Parts of the highway network in the District experiences high levels of congestion and delays. Rail capacity is also currently stretched and capacity pressures London services are expected to increase. Population growth has the</p>	<p>Policy 39 of the HDPF addresses the provision of new infrastructure to meet new needs of development and this includes new transport provisions. Furthermore Policy 40 supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However, without the Local Plan Review there is potential for congestion to continue to be an issue in Horsham, particularly given that the</p>	<p>SA objective 13</p>

<p>potential to exacerbate these problems.</p>	<p>growing population is likely to exacerbate this issue. The Local Plan Review presents the opportunity to address this by providing clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by highways authorities to combat congestion on the strategic road network.</p>	
<p>Given the rural character of much of the District a large proportion of the District's residents drive to work and some have access to limited bus services and other public transport links.</p>	<p>Policy 40 of the HDPF supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However, the Local Plan presents the opportunity to further address the issue of car dependency in the District. This can be achieved by promoting sustainable and active transport (based on sufficient population densities), sustainable development locations, and integrating new and more sustainable technologies, as new development is to be provided in the District.</p>	<p>SA objective 13</p>
<p>Horsham District Council has two identified AQMAs at Cowfold and Storrington. There are also two AQMAs in close proximity to the northeastern 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.</p>	<p>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.</p>	<p>SA objective 14</p>
<p>The District contains a mix of classified agricultural land, the majority being Grade 3, with small areas of</p>	<p>The HDPF seeks to promote the development of brownfield land which is not of high environmental value through Policy 2. Furthermore the NPPF supports the re-</p>	<p>SA objective 9</p>

<p>Grade 2 and Grade 4. New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.</p>	<p>use of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by "<i>recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land</i>". The Local Plan Review provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.</p>	
<p>The District contains safeguarded mineral resources, minerals infrastructure and waste infrastructure which, where possible, should not be lost or compromised by future growth.</p>	<p>Without the Local Plan Review it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy M9 of the West Sussex Joint Minerals Local Plan addresses Proposals for non-mineral development within the Minerals Safeguarded Areas.</p>	<p>SA objective 10</p>
<p>Some of the water bodies which flow through the District have been identified by the Environment Agency as having 'bad' or 'poor' ecological status. There are also areas in the District which are covered by a Source Protection Zone.</p>	<p>Without the Local Plan Review it is possible that un-planned development could be located in areas that will exacerbate existing water quality issues, although existing safeguards, such as the EU Water Framework Directive, would provide some protection. Development which occurs within Source Protection Zones presents the risk of contamination from any activities that might cause pollution in the area. Policy 39 of the HDPF requires that sufficient capacity in the existing local infrastructure is provided to meet the additional requirements arising from new development and this is likely to support the delivery of mitigation which would help to prevent water quality issues emerging. The Local Plan Review will provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.</p>	<p>SA objective 11</p>
<p>The whole of the District is within the Sussex North Water Supply Zone, where groundwater abstraction</p>	<p>Without the Local Plan Review it is possible that development will be able to come forward without being able to adequately demonstrate water neutrality. This will have</p>	<p>SA Objective 1 SA Objective 6 SA Objective 10</p>

<p>may be having an adverse effect on a number of environmentally designated sites. Natural England have indicated that development should not add to the adverse impact.</p>	<p>an impact on environmentally designated sites due to increased water consumption from new development. The Local Plan Review incorporates policies to ensure that development coming forward must demonstrate that they will have no adverse impact on environmentally designated sites due to increased water abstraction.</p>	<p>SA Objective 11</p>
<p>Climate change is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The rural character of the District means that there are likely to be difficulties with regards the delivery of measures to help reduce greenhouse gas emissions. The District has the second highest greenhouse gas emissions in the County. The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings.</p>	<p>Climate change is likely to have on-going effects regardless of the Local Plan Review, considering the scale of the challenge this issue poses. The HDPF already includes policies seeking to address this issue, including Policy 35 which supports development which makes a clear contribution to mitigating and adapting to the impacts of climate change. The obligation of the Council to reduce carbon emissions will also remain with or without the Local Plan Review. The Local Plan Review provides an opportunity to strengthen policies which seek to act positively in terms of climate change contributions. An important part of this overall approach will be to help limit the need to travel in the District through the appropriate siting of new development. The Local Plan Review will also present opportunities to encourage low-carbon design, promotion of renewable energy and sustainable transport infrastructure delivery.</p>	<p>SA objective 12 SA objective 15</p>
<p>The effects of climate change in the District are likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.</p>	<p>Policy 35 of the HDPF is supportive of design and construction measures which provide resilience to climate change. Whilst the Local Plan Review will not influence extreme weather events, it can build upon the approach of current planning policy to ensure adaptation through design and better respond to current circumstances. This is likely to include building orientation, shading including tree planting, protection against extreme weather events in the public realm including public transport facilities, the use of SuDS and green infrastructure as well as promotion of water conservation and recycling.</p>	<p>SA objective 12 SA objective 15</p>
<p>Flood risk in Horsham is dominated by fluvial flooding which is the source of most risk. The expected</p>	<p>The Local Plan Review is not expected to reduce the likelihood of fluvial flooding. Policy 38 of the HDPF currently seeks to reduce the potential for increases in flood</p>	<p>SA objective 12 SA objective 15</p>

<p>magnitude and probability of significant fluvial, tidal, ground and surface water flooding could increase in the District as a result of climate change.</p>	<p>risk as a result of the location of new development and requires the use of SuDS. The Local Plan Review presents the opportunity, alongside national measures, to mitigate the effects of potential future flooding and locate development in sustainable locations that would not be significantly impacted by flooding and ensure it is designed to be flood resilient where appropriate. The review process will also allow policy to respond most appropriately to the updated evidence base in relation to flood risk in Horsham.</p>	
<p>The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance.</p>	<p>Pressures on the natural environment in Horsham are likely to continue regardless of the Local Plan Review particularly given the requirement for more development to meet growth projections. The HDPF includes policies seeking to address these pressures, including Policy 31 which provides for the support of the network of green infrastructure as well as sites and habitats identified for their specific importance. The Local Plan Review presents the opportunity for new development to come forward at the most appropriate locations as to limit detrimental impacts on biodiversity assets. The review process also offers the opportunity to update planning policy in relation to the protection of areas which are of importance in terms of their biodiversity and geodiversity value with consideration for the future evolution of development in the District and the provision of net biodiversity gain. The findings of HRA will be incorporated into the SA and will provide further insight into biodiversity impacts specifically at European sites presenting the opportunities to limit adverse impacts at such locations.</p>	<p>SA objective 6</p>
<p>Although designated sites represent the most valued habitats in the District, the overall ecological network is important for biodiversity as a whole, helps to support the health designated sites, and allows species to migrate in response to climate change. Fragmentation and erosion of habitats and the wider ecological network is an ongoing threat to biodiversity.</p>	<p>Erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. In addition, Policy 31 of the HDPF requires development proposals to contribute to the enhancement of existing biodiversity, and to create and manage new habitats where appropriate. The policy also supports development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional</p>	<p>SA objective 6 SA objective 15</p>

	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.	
There are many sites, features and areas of historical and cultural interest in the District, some of which are at risk and identified on the Heritage at Risk Register. These assets may be particularly vulnerable to development which is poorly located or designed.	The HDPF includes policies seeking to protect and enhance the historic environment, including Policy 34, which requires the Council to positively manage development affecting heritage assets. The Local Plan Review presents the opportunity to guide new development to locations which are less sensitive in terms of their impact on heritage assets (with consideration for other sustainability issues) through the SA process applied to potential site allocations. The Local Plan Review will allow for any update required to be made to the policy position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.	SA objective 8
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

3.4 Stage A4: The SA Framework

- 3.48 The SA appraises the likely significant effects of the Local Plan in relation to whether they will help to meet a set of sustainability objectives – the ‘SA framework’. The sustainability objectives and supporting appraisal questions were defined with reference to the key sustainability issues facing the District and the international, national, and sub-regional policy objectives that provide the context for the Local Plan.
- 3.49 The sustainability objectives included in the SA framework are set out in Table 3.3. The topics required to be covered by the SEA Regulations are biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationships between these. A fuller version of the SA Framework is included in Appendix B of the draft Regulation 19 LUC SA Document. The Appendix includes a column showing the relationship between these statutory topics and the SA objectives, and confirms that they have been assessed. Table 3.4 shows the symbols and colour coding used throughout this SA.

Table 3.3: SA framework

SA Objective
SA 1: To provide affordable, sustainable and decent housing to meet local needs.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.
SA 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced.
SA 5: To improve public health and wellbeing and reduce health inequalities.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.
SA 7: To conserve and enhance the character and distinctiveness of the District’s landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District’s historic environment.
SA 9: To make efficient use of the District’s land resources through the re-use of previously developed land and conserve its soils.
SA 10: To conserve natural resources, including mineral resources in the District.
SA 11: To achieve sustainable water resource management and promote the quality of the District’s waters.
SA 12: To manage and reduce the risk of flooding.

SA Objective
SA 13: To reduce congestion and the need to travel by private vehicle in the District.
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.
SA 16: To facilitate a sustainable and growing economy.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.

Table 3.4: Key to symbols and colour coding used in SA

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

3.5 Stage A5: Consultation on the Scoping Report

3.50 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted “*when deciding on the scope and level of detail of the information that must be included*” in the SA Report. The scope and level of detail of the SA is governed by the SA framework and the statutory consultees (and the local authority areas which surround Horsham District) were consulted as part of the scoping process for the SA³. This consultation on the SA Scoping Report was undertaken for a five-week period starting in September 2019.

3.51 Appendix B lists the comments that were received on the SA Scoping Report during this period of consultation and describes how each one has been addressed. In light of the comments received, a number of amendments were made to the review of policies, plans, and programmes, the baseline information, key sustainability issues, the SA

³ This original scoping process is described in the SA Scoping Report prepared by LUC in August 2019.

framework and the SA assumptions. Those amendments are reflected in the relevant parts of this current SA Report.

4.0 Development of Local Plan to July 2021: Reasonable Alternatives

- 4.1 Horsham District Council adopted its current Local Plan in November 2015. The plan sets out the planning strategy for the District up to 2031.
- 4.2 The Inspector who undertook the independent examination of the adopted Local Plan concluded that further work would be needed by the Council to identify future accommodation needs, including for Gypsies and Travellers, and to ensure that sufficient land is made available to meet the needs of businesses and to support economic growth.
- 4.3 In line with Government guidance which states that local authorities should review their Local Plans every five years, the Council is now reviewing the adopted Local Plan. The new Local Plan will run from 2023 to 2040. The new Local Plan will set the planning strategy for this updated period to meet the social, economic and environmental needs of the District. The Local Plan Review process commenced in April 2018 with the preparation of an Issues and Options document. This document had a particular focus on Employment, Tourism and Sustainable Rural Development and was subject to public consultation between April and May 2018.
- 4.4 The Council commenced the Local Plan Review by considering a series of high-level quantum of growth and spatial strategy options. This enabled some early SA findings to be generated, which helped to inform the creation of more detailed growth scenarios, taking into account individual site options.
- 4.5 Consultation on the Regulation 18 Local Plan was undertaken between February and March 2020. The key alternatives considered for the Regulation 18 stage related to the quantum of growth; the broad distribution of development; and the more specific location of future development.

Appraisal of the Quantum of Growth Options

- 4.6 The draft Regulation 19 LUC SA Document was prepared at a point in time when the Government's Standard Method calculation for housing need, as applied to Horsham, was 897 dwellings per annum (dpa). This calculation takes account of the forecast growth in households over a set period, plus an uplift to reflect a lack of housing affordability in the area. The NPPF expects that this need should be met in full through provision in the Local Plan, unless protection of certain environmental assets or adverse impacts assessed against the NPPF policies justifies otherwise. It should be noted that

standard housing figure is updated each year, and at the time of writing is 911 dwellings per annum.

- 4.7 There is a further expectation in the NPPF: that unmet development needs from neighbouring authorities that lack the capacity to meet their own full need should also be met as far as possible. As Horsham falls within the North West Sussex housing market area, the Council has in particular considered whether it can meet some of Crawley Borough's unmet housing need as well as its own need. Consideration was also given to the extent to which housing needs outside the immediate housing market area could be met. For this reason, development quanta well above the standard methodology figure were considered as reasonable alternatives.
- 4.8 Three different quanta of growth options (lower growth – 1,000 dpa, medium growth – 1,200 dpa and higher growth – 1,400 dpa) were considered initially by the council for the Regulation 18 draft Local Plan.
- 4.9 Two additional quanta of growth options were later added at the draft Regulation 19 stage to consider a new 'near maximum' (1,600dpa) and 'maximum' (1,800 dpa), reflecting the District's (then) theoretical potential to accommodate growth from neighbouring authorities additional to that already considered, in response to concerns raised by stakeholders under the Duty to Cooperate.
- 4.10 The updated appraisal work carried out by LUC between the Regulation 18 stage and July 2021 reflected a revised plan period of 2021 to 2038. At that time, 8,063 homes already had planning permission or were otherwise identified for development and the Council had evidence that 1,875 windfall units would be delivered during that time frame. The appraisal work in the draft Regulation 19 LUC SA Document related to the effects which would have taken place, over and above those associated with the already committed development, windfall housing or homes already completed.
- 4.11 The five quanta of growth options tested by LUC are presented in Figure 4.1 below. The quantum options considered did not incorporate any information about the spatial distribution of growth across the plan area. As such, they were considered at a high level and the appraisal findings reflect the potential effects of delivering varying levels of growth in principle at undecided locations within the District.
- 4.12 Table 4.1 summarises the likely SA effects of the five quantum options considered. A more detailed analysis can be found in Chapter 4 of the draft Regulation 19 LUC SA Document.

Figure 4.1: Quanta of growth options

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

Level of housing development set out at a level to meet the standard methodology calculation for Local Housing Need for the District (965 dpa)¹ with consideration for a slight uplift in provision to ensure flexibility in housing supply.

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

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

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

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

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

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

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

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

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

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

Maximum level of growth with the District making an even greater contribution to the unmet needs of a number of neighbouring districts under the Duty to Cooperate.

Table 4.1: Summary of likely sustainability effects of the growth quantum options

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

4.13 The appraisal found that the higher the quantum of growth, the more positively the options tended to perform against socio-economic objectives, e.g. meeting housing need (including affordable housing and the needs of surrounding districts) and the provision of services and facilities, economic growth and job creation. In contrast, it found that the higher the quantum of growth, the more likely it is that there will be significant negative effects on environmental assets, such as biodiversity, landscape and the historic environment, and environmental resources, such as water, soils and minerals, and air quality. Similarly, higher growth is more likely to result in development impinging on areas of flood risk or generating surface water run-off.

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

- 4.15 With respect to services and facilities, such as schools, healthcare, open space and sports facilities, it was found that the higher the growth option, the greater the pressure on existing provision and the more likely it is that significant investment in new and improved provision would be required. This could potentially be facilitated through contributions from development. By supporting higher levels of growth in the plan area, the resultant support for increased service provision may also help to partially offset the need to travel longer distances day-to-day.
- 4.16 The purpose of the SA of the Quantum of Growth options was not to provide a definitive conclusion about which of the five options would be the most sustainable. Instead, its purpose was to draw out the comparative advantages and disadvantages of each option, to inform the decision as to which quantum of growth should be pursued through the Local Plan. Ultimately, the Council was obliged to conform with the NPPF which states that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area. In light of the wider evidence supporting the preparation of the draft Regulation 19 document dated July 2021, and taking into account the SA findings, an average delivery rate target of 1,100 homes per year was proposed. This sat between Quantum Options 1 and 2, thereby balancing a positive outcome for housing delivery and economic growth with the need to protect and enhance the environment.

4.2 Spatial Strategy Options / Broad Distribution of Development

- 4.17 Six broad spatial strategy options for the distribution of development were identified by the Council, taking into account settlement pattern, the relationship of Horsham District with its surrounding areas and the potential larger scale development sites:

Option 1: Existing settlement hierarchy strategy

Focus growth in and around the key settlement of Horsham and allow for growth in the rest of the District in accordance with the identified settlement hierarchy.

Option 2: Proportionate growth strategy

Growth is apportioned to all settlements in a more dispersed distribution in a way that is proportionate to the existing number of households/population.

Option 3: New Garden Towns

Strategic scale growth (90%) is delivered as new garden towns, with a small remainder (10% of total) delivered at small sites in accordance with localism principles.

Option 4: New Urban Extensions.

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

Option 5: Employment Strategy

Focus growth in Horsham District at locations expected to see significant employment

growth (which could include employment growth close to the District boundary to respond to the areas which are of economic importance outside of Horsham).

Option 6: Sustainable transport strategy

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

4.18 The broad spatial strategy options were subject to SA in the draft Regulation 19 LUC SA Document. The appraisal work considered both the principle of distributing growth in line with each option and, where appropriate, the implication of possible locations coming forward under that option. This was of particular relevance in relation to Options 3 and 4 which were informed by the large-scale site options being considered by the Council for garden towns and urban extensions within the Horsham District. In order to be precautionary, any potential effects that could arise at particular locations where development could come forward under an option influenced the overall likely effect recorded.

4.19 Some overarching key assumptions and themes were considered and used to inform the appraisal of the broad spatial options. This included the strong economic relationship between Horsham District, Crawley and the surrounding Gatwick Diamond area, which, alongside areas such as London, provide employment opportunities for a large number of residents. It was evident that the District sees a higher level of out-commuting than these neighbouring areas, and so it was assumed that failure to seek to provide some level of growth related to Crawley and Gatwick may fail to best respond to the economic realities of the area. Moreover, a strategy which was not well-related to Crawley and Gatwick would miss the opportunity to respond positively to any unmet housing need arising from Crawley specifically.

4.20 The detailed findings for each of the spatial growth options according to SA objective is set out in Chapter 4 of the draft Regulation 19 LUC SA Document, however a summary of this assessment is presented in Table 4.2.

Table 4.2 Summary of likely sustainability effects of the broad spatial options

SA Objective	Option 1: Existing settlement hierarchy	Option 2: Proportionate growth	Option 3: New garden towns	Option 4: New urban extensions	Option 5: Employment strategy	Option 6: Sustainable transport strategy
1: Housing	++	++/-?	++?	++?	++	++
2: Access to services	++/-?	--/+	++/--?	++/-?	++/--	++/-
3: Inclusive communities	++	+/-	++/--?	++/-?	++/-	+/-

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

4.21 The appraisal indicates that Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) perform better than the other strategy options in relation to many of the SA objectives. Both options would provide new growth by the main settlement of Horsham which acts as the main economic centre and service provider in the District. Option 1 would provide a high number of residents with access to the largest settlements in Horsham which support the widest range of services and facilities and employment opportunities in the District. Option 1 therefore presents more potential for avoiding adverse impacts in terms of social integration and local landscape and townscapes.

4.22 The SA acknowledged that some development may need to be accommodated at one of the new settlement site options, given the overall level of growth which is required over the plan period. The inclusion of this type of site could help to provide new services and facilities as well as new high-quality employment land that makes use of the strategic road network to the benefit of the surrounding area. It was noted that an

approach of this nature would have to take into account particular environmental sensitivities of the District, including the High Weald AONB, which borders parts of settlement edge of the town of Horsham as well as Crawley and the South Downs National Park, which lies to the south. The SA noted that the actual effects of the overall spatial option would depend heavily upon the precise location and scale of development, the quality of design and the delivery of supporting infrastructure.

- 4.23 The SA at the Regulation 18 stage concluded that the Council may wish to consider taking forward a hybrid of options to include development in line with the existing development hierarchy, one or more large growth points (with many of the urban extensions noted to performing more sustainably in relation to a number of objectives) and a sizeable proportion of growth delivered at a location which makes best use of the District's strong relationship with Crawley.
- 4.24 In order to provide the Council with more detailed analysis, further SA work was carried out that considered different combinations of the spatial strategy options and different quanta of development. This was presented in the form of growth scenarios and is summarised in Table 4.1. It was evident from this stage that a combination of Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) would form a sensible basis for preferred site selection. However, given the scale of development required to meet NPPF objectives, it was noted that the emerging strategy should also to some degree reflect the principles in Option 3 (New garden towns) combined with Option 6 (Sustainable transport strategy).

4.3 Large Site Alternatives

- 4.25 The Council initially considered 10 large site options as part of the Local Plan review. These were strategic sites that could make a significant contribution to the future housing needs for the District. These sites were appraised in more detail than the small site options, with consideration for the specific proposals at each location. The sites comprised a mix of urban extensions and new settlement proposals.
- 4.26 In addition to the 10 large site options, a cluster of sites known as the 'Ashington cluster' was also appraised to the same level of detail due to the high amount of development it could provide. The sites forming the Ashington Cluster came forward separately as part of the Council's SHELAA process but were being promoted as one site by a consortium of developers. The appraisal of the Ashington cluster site as one large, combined site reflects the fact that delivery of some parcels of land within the cluster are dependent on the whole cluster coming forward. This approach does not imply that certain parcels could not come forward independently, should a lower level of development ultimately be deemed appropriate. Parcels that make up the Ashington

cluster site that have potential to come forward individually (SA085, SA520 and SA539) were appraised separately in the SA Report as small site options (Chapter 6 and Appendix E of the draft Regulation 19 LUC SA Document).

- 4.27 The assumptions set out in Appendix C of the draft Regulation 19 LUC SA Document were used to inform the appraisal of the large site options. However, specific details of the proposals for each site were also taken into account in the appraisal. These proposals were presented separately in detail in the site assessment proformas published by the Council as part of the evidence base for the Local Plan Review. The detailed SA matrices for each of the large site options is presented in Appendix D of the draft Regulation 19 LUC SA Document.
- 4.28 The appraisal work that was originally undertaken for these 11 site options as part of the SA work for the Regulation 18 Local Plan was updated by LUC in 2021 to take into account new information provided by the Council in relation to expected proposals for each site. The updated appraisal work also reflected any changes to the site boundaries, baseline conditions and the Council’s assessment work for these sites since the Regulation 18 stage (e.g. if new information had become available in relation to requirements for sites to be supported by wastewater treatment work infrastructure). For sites that were appraised in the SA report for the Regulation 18 Local Plan, and were updated in light of new evidence, the matrices in Appendix D of the draft Regulation 19 LUC SA Document show the likely effects that were identified at both stages.
- 4.29 This update of the large sites appraisal work considered one additional large site option – the Horsham Golf & Fitness Club site. This site had been deemed in the Regulation 18 Site Assessment Report to be not suitable for development by the Council, the main reason being that it would have a very negative landscape impact partly as the site is predominantly rural in character, and development would lead to coalescence of Horsham and Southwater. Notwithstanding this, the site was appraised to the same level of detail as the other large site options because it was being promoted for a significant number of homes. As such it was recognised as having strategic implications.
- 4.30 The West of Kilnwood Vale site was no longer considered by the Council to have potential to be developed as a strategic site at the time of the draft Regulation 19 preparation, and the reduced expected capacity of the site for housing delivery was reflected in the appraisal of this site. Given that the site still has capacity for a substantial amount of development (350 homes) the findings for this site were presented alongside the other large site options.
- 4.31 In addition, by way of further update to the Regulation 18 SA Report, the appraisal of the large site options was updated to take into account the requirement of paragraph 22 of the NPPF to consider strategic sites in the context of a 30 year vision. The updated PPG clarifies that this requirement, is to be applied “*where most of the development*

arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period.” The SA was updated to ensure a consistent approach to all large site options.

- 4.32 For sites which would continue to be built out beyond the end of the plan period if allocated, the Council considered a 30 year vision for each of the strategic site options. Each vision took account of the aspirations for the relevant site over a timeframe longer than the Local Plan period. The 30 year vision for each strategic site option reflected information from the site promoters about the realistic development and infrastructure which was expected to be delivered over this longer period. Appendix D of the draft Regulation 19 LUC SA Document (reflected in this chapter) was updated to also take account of those site visions. This update of the appraisal focuses on the SA objectives which would most likely be affected differently in the longer term as opposed to presenting an entirely new appraisal of each large site option. This approach is considered proportionate to the requirements of the NPPF.
- 4.33 Since 2021, many site promoters have continued to develop their site proposals. Where these changes have been consistent with strategic level matters (e.g. significant updates to the quantum of housing proposed on a site) this has been considered by way of reviewing the SA outcomes as reported in Section 7 of this report.
- 4.34 In summary, 12 large site options were promoted to the Council as potential new communities / urban extensions delivering significant housing development. For completeness, and due to their strategic implications, all of these were included in the draft Regulation 19 LUC SA Document. All of these were incorporated into one or more growth scenarios considered below.

Site SA101: Land West of Ifield (urban extension)

3,250 dwellings and approximately 9,000sqm B2/B8 and former B1 uses (c.2.0ha) within the plan period (and a total of 10,000 dwellings in the longer term when fully built out).

Site SA118: Land East of Billingshurst (urban extension)

650 dwellings and 2,200sqm B2/B8 and former B1 uses (0.5ha) within the plan period.

Site SA119: West of Southwater (urban extension)

1,200 dwellings and 18,000sqm B2/B8 and former B1 uses (c.4.0ha) within the plan period.

SA291: West of Kilnwood Vale extension (urban extension)

350 dwellings with no substantial employment land provision within the plan period

Site SA394: Rookwood (urban extension)

725 dwellings and 3,000sqm E uses (start-up or flexible desk space facilities) (c.0.4ha) within the plan period.

Site SA414: Land North East of Henfield (Mayfield) (new settlement)

2,000 dwellings and the creation of 7,000 new jobs through the provision of new employment floorspace within the plan period (and a total of 7,000 homes in the longer term when fully built out).

Site SA459/SA674/SA846: Land East of Kingsfold (urban extension/satellite settlement)

1,000 dwellings and 75,000m² of employment space within the plan period (and a total of 1,300 dwellings in the longer term).

Site SA597: Adversane / Land at Steepwood Farm (new settlement)

2,000 dwellings and the creation of 2,450 jobs within the plan period (and a total of 2,850 dwellings in the longer term).

Site SA716: Buck Barn / Land at Newhouse Farm, West Grinstead (new settlement)

2,100 dwellings, 30,000sqm B2/B8 and former B1 uses (of which 21,200sqm B2/B8) (c.6.5ha) within the plan period (the proposals at Buck Barn are for a settlement of around 3,000 homes, but the total quantum of this development cannot be delivered in the plan period).

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

1,000 dwellings and 4,600m² of B class use employment space within the plan period

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

500-550 dwellings and a range of sports facilities.

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

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

4.35 Table 4.3 summarises the SA scores for the twelve large site options appraised in the draft Regulation 19 LUC SA Document, 2021. The large sites taken forward for allocation in the Regulation 19 Local Plan are listed in Chapter 7 together with updated site appraisals for site proposals that have significantly changed since July 2021. The fuller appraisal of the large site options included in Table 4.3 is available in Chapter 5 of the draft Regulation 19 LUC SA Document. It should be noted that of these, Land North-East of Henfield (Mayfields), Rookwood and Kilnwood Vale are no longer being promoted for inclusion in this Plan review and will therefore no longer feature in future updates to the SA.

Table 4.3 Summary of likely sustainability effects of the large site options considered for the Horsham Local Plan

SA Objective	Urban extension or 'satellite settlement' sites									Standalone new settlement sites		
	SA101: West of Ifield	SA118: Land East of Billingshurst	SA119: West of Southwater	SA291: West of Kilnwood Vale	SA394: Rookwood	SA459/SA674/SA846: Land East of Kingsfold	SA744 (includes SA225)/SA668: West of Billingshurst	SA754: Horsham Golf & Fitness Club	SA085/SA520/SA524/SA539/SA790: Ashington cluster	SA414: Land North East of Henfield (Mayfield)	SA597: Adversane	SA716: Buck Barn
1: Housing	++	++	++?	+	++	++	++	++	+	++	++	++

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

4.36 The appraisal found that all of the sites would have a positive impact in terms of provision of homes and support for economic growth. More mixed effects were expected in relation to health and wellbeing as well as access to services depending on proximity to existing settlements. A range of negative effects were expected for many of the large site options in relation to the environmental objectives: many have the potential to result in loss of large areas of greenfield land, high value agricultural soils and permeable surfaces as well as finite mineral resources. There is also potential for impacts on the landscape, the historic environment and biodiversity/geodiversity assets in the District.

4.37 The urban extension sites generally performed better than the new settlement sites given their level of access to existing jobs, services and facilities. Delivering new large-

scale development at these locations could also provide new jobs, services and facilities where existing residents could easily access them, this would further help to limit the need for residents to travel longer distances.

- 4.38 The distribution of environmental constraints and assets throughout the plan area meant that clear-cut judgements about the best performing site options in relation to effects on the natural and built environment and biodiversity in the plan area were difficult to make.
- 4.39 The best performing urban extension sites were Rookwood, West of Ifield and West of Southwater because of their close proximity to the main centres of population which are also of most importance for economic growth for the area at Crawley and Horsham town. The urban extension sites at East of Billingshurst, West of Billingshurst and Horsham Golf and Fitness Club performed less favourably than Rookwood, West Ifield and West of Southwater (with Horsham Golf and Fitness performing worse than the other two sites). The West of Kilnwood Vale site and the Ashington cluster site performed least well of all urban extension options considered. These were the only large sites with a capacity for fewer than 500 homes. Ashington is a relatively small settlement in comparison to where other urban extensions were considered.
- 4.40 Of the new settlement options appraised, Adversane and Buck Barn performed comparably with only marginal differences between them. These two sites performed more strongly than the North-east of Henfield (Mayfield) site. It is notable that, of these three sites, the Buck Barn site performed best in relation to impacts on landscape character. This site also performed most favourably in relation to biodiversity, given that its delivery would support substantial green infrastructure and a country park.
- 4.41 However, the Adversane site outperformed Buck Barn as well as North-east of Henfield in terms of air quality and climate change. Development at the Adversane site is less likely to result in increased traffic within an AQMA. While the Buck Barn site included provisions which could help to reduce the need to travel from the site by private vehicle, its development would also support substantial improvements to the strategic road network. These improvements would help to limit congestion in the area but would do little to discourage travel by private vehicle given the proximity of the site to A24 and A272.
- 4.42 The north-east of Henfield site is relatively isolated from existing key employment areas and larger town centres as well as transport links which might otherwise be used to access employment opportunities. The Kingsfold site would, in effect act as a standalone new settlement. The settlement would likely function as a satellite to Horsham town, with residents dependent upon access to that settlement for many services and facilities.

- 4.43 The Horsham Strategic Planning Team’s reasons for recommending allocating or discounting sites in the July 2021 Cabinet version of the Local Plan were explained in Chapter 9 of the draft Regulation 19 LUC SA Document, as part of Strategic Planning’s reasons for choosing the preferred approach for the spatial strategy. As well as the sustainability of the sites individually, the recommendations also took account of the sustainability of the overall pattern of development across all SA and Local Plan objectives. It should be recognised that the preferred spatial strategy has changed since July 2021, most notably such that a former recommendation that the Buck Barn large site be allocated has changed to now omit any such allocation.
- 4.44 Because there have been changes to the available site options following the publication of Natural England’s Position Statement on Water Neutrality, an updated Large Sites appraisal has been included in Chapter 7 of this document. This chapter also reviews those large site appraisals that have seen significant or fundamental changes to the development proposed, and sets out the reasons for choosing the new updated preferred approach as now set out in the Local Plan.

4.4 Smaller Site Alternatives

- 4.45 In addition to the new, large site allocations that will be necessary to help meet the housing requirements for the District, the Council identified a number of small site options that could potentially be allocated for housing or other uses in and around the towns and villages.
- 4.46 The majority of these sites were considered to have potential to contribute to the local housing need (i.e. those considered for residential use or residential led mixed use development). The remaining sites have been considered for employment use only or for use for Gypsy and Traveller accommodation. It should be noted that the residential led sites included some sites in Ashington, which were also assessed as part of the ‘Ashington cluster’ strategic site, as reported in the previous chapter. These are sites that were considered to have potential to come forward in their own right if they are not delivered as part of the larger ‘cluster’ site.
- 4.47 Each of the small site options were appraised in line with the methodology set out in Chapter 2 of draft Regulation 19 LUC SA Document. The assumptions which were used to inform the appraisal of these site options are presented in Appendix C of the draft Regulation 19 LUC SA Document. The detailed matrices for each of the small site options appraised by LUC are presented in Appendix D of the draft Regulation 19 LUC SA Document while a summary of the SA findings can be found in Table 4.5 further ahead in this section.

- 4.48 A small number of additional small sites were submitted to the Council for assessment following the preparation of the July 2021 Cabinet version of the Local Plan. These new additional small sites have been appraised in Chapter 7 of this report.
- 4.49 The small site options in Table 4.5 are grouped according to the settlement which they are closest to. This allows for a consideration of effects in relation to the individual settlements of the plan area. The number of expected homes to be provided at residential site options has been included for reference. In general, the amount of employment land at relevant site options is proportionate to the site size and therefore this information has not been included in the table.
- 4.50 The appraisal of all sites has been undertaken using a ‘policy off’ approach. That is to say, mitigation which might be delivered through the policies in the Regulation 19 Local Plan that allocate some of the sites has not influenced the findings presented here. Consideration for the mitigation which might be achieved through the requirements of these policies is reflected in the appraisal of the individual policies in question in Chapter 8 of this report and Chapter 9 of the draft Regulation 19 LUC SA Document.
- 4.51 Since completion of the SA work undertaken for the Regulation 18 Local Plan, a number of changes were made to the ‘reasonable alternative small-scale site options for allocation in the Local Plan’ meaning sites SA070, SA191, SA565 and SA819 were no longer considered reasonable alternatives for allocation. The appraisals of these small site options have been presented in the SA report for completeness, however their reasons for rejection are presented in Table 4.4.

Table 4.4: Details of sites rejected by Council as reasonable alternatives

Site reference	Considered at Regulation 18 for	Reason for no longer considering site a reasonable alternative
SA070	Residential use - 25 dwellings	Updated heritage assessment work indicates that the site is no longer suitable for allocation due to the fact that development is considered likely to impact the setting of the Listed Heritage Assets which the site lies adjacent to, with the rural location a particular importance part of the setting of the Conservation Area.
SA191	Employment use	The site has recently been granted planning permission for 10,000-sqm office floorspace and there is no longer a need for its allocation.
SA565	Residential use - 12 dwellings	The site contains pylons and is not well related to the existing settlement at Billingshurst and is therefore not suitable for allocation.
SA819	Employment use	The site is no longer proposed as a standalone allocation because it has now been subsumed into the East of Billingshurst strategic site, SA118. Site SA819 will in effect become the employment provision for that strategic site.

- 4.52 The audit trail for all site options considered as part of the Council’s site selection process at the Regulation 18 and Regulation 19 stages is presented in Appendix F of the draft Regulation 19 LUC SA Document. This includes the Council’s reasons for decision making in relation to those sites which were proposed for allocation or not.

4.53 The reasonable alternative site list has also been updated to include site SA689. This site was omitted in error from the SA work for the Regulation 18 Local Plan but was included in the draft Regulation 19 LUC SA Document is now appraised in this SA report.

Table 4.5: Summary of the likely sustainability effects of the small site options considered for the Horsham District Local Plan as per July 2021

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
Ashington																	
SA085 (residential - 20 dwellings)	++	+/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	0
SA122/SA131/SA548/SA735 (residential - 225 dwellings)	++	+	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	+
SA520 (residential - 95 dwellings)	++	+/-?	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA539 (residential - 80 dwellings)	++	+/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
SA866 (residential - 75 dwellings)	++	+	0	0?	+	-?	--?	0?	-	--?	0	-	+	0	+	0	+
Barns Green																	
SA006 (residential - 50 dwellings)	++	+	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
SA344 (residential - 30 dwellings)	++	+	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
SA510 (residential - 25 dwellings)	++	+	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	--
SA613 (residential - 30 dwellings)	++	+	+	0?	--/+	-?	-?	--?	+	--?	0	0	+	0	+	0	--
Billingshurst																	
SA565 (residential - 12 dwellings)	++	++/-?	0	0?	++	-?	--?	?	--?	--?	0	-	++	0	++	0	+
SA656 (residential - 10 dwellings)	+	+++	0	0?	+	--?	?	--?	--?	--?	0	-	++	0	++	0	+
SA698 (residential - 40 dwellings)	++	++/-?	0	0?	++	-?	--?	-?	--?	--?	0	-	++	0	++	0	+

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA560 (residential – 80 dwellings)	++	++?	0	0?	+	-?	-?	-?	-?	-?	0	-	++	0	++	0	+
SA607 (residential – 30 dwellings)	++	++/-?	0	0?	+	-?	-?	-?	-?	-?	0	-	++	0	++	0	+
SA678 (residential – 80 dwellings)	++	++?	0	0?	+	-?	-?	-?	-?	-?	0	-	++	0	++	0	+
SA770 (residential – 105 dwellings)	++	++/-?	0	0?	++	-?	-?	-?	-?	-?	0	-	++	0	++	0	+
SA573 employment use)	0	++	0	0?	++	--?	--?	-?	--?	--?	0	-	++	0	++	+	++
GA016 (Gypsy and Traveller use)	++	-?	0	0?	+	--?	?	0?	--?	--?	0	-	+	0	+	0	-
SA819 (employment)	0	++	+	0?	+	--?	--?	?	+	--?	0	0	++	0	++	++	++
Bramber and Upper Beeding																	
SA483/SA055/SA488 (residential – 70 dwellings)	++	++?	0	0?	++	--?	?	--?	-	0	0	-	-	0	-	0	-
Broadbridge Heath and Slinfold																	
SA102 (employment)	0	++?	+	0?	+	--?	--?	--?	-	--?	0	-	+	0	+	+	+
SA386 (- residential – 150 dwellings)	++	++/-?	+	0?	+	-?	-?	--?	--?	--?	0	-	+	0	+	0	+
SA622 (residential – potential for retirement housing and specialist care accommodation-140 dwellings)	++	++	+	0?	+	-?	--?	-?	-	--?	0	-	+	0	+	+	+

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA833 (employment)	0	+	+	0?	+	-?	?	0?	--?	--?	0	-	+	0	+	++	+
GA002 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	+	0	+	0	+
Christ's Hospital																	
SA129 (residential – 20 dwellings)	++	++?	0	0?	+	-?	--?	0?	-	--?	0	-	++	0	++	0	++
Cowfold																	
SA076/SA083 (residential – 35 dwellings)	++	+	0	0?	++	0?	--?	-?	--?	--?	0	-	+	--	+	0	+
SA366 (residential – 100 dwellings)	++	+	0	0?	++	-?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA609 (residential – 35 dwellings)	++	+	0	0?	++	0?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA610/SA611 (residential – 35 dwellings)	++	+	0	0?	++	0?	-?	--?	--?	--?	0	-	+	--	+	0	+
GA017 (Gypsy and Traveller use)	++	-?	0	0?	-	-?	--?	0?	--?	--?	0	-	+	--	+	0	--
Henfield																	
SA005 (residential – 100 dwellings)	++	++/-?	0	0?	++	0?	--?	-?	--	--?	0	-	+	0	+	0	+
SA011 (residential – 30 dwellings)	++	++/-?	0	0?	++	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA065 (residential – 25 dwellings)	++	++/-?	0	0?	++	0?	0?	0?	--?	--?	0	-	+	0	+	0	-
SA317 (residential – 55 dwellings)	++	++/-?	0	0?	+	--?	--?	--?	--	--?	0	-	+	0	+	0	-

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA504 (residential – 10 dwellings)	++	++/-?	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA686 (residential – 205 dwellings)	++	++?	0	0?	++	-?	--?	0?	--?	--?	0	-	+	0	+	0	-
GA011 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	+	0	+	0	-
Horsham																	
SA074 (residential – 100 dwellings)	++	++?	0	0?	+	--?	--?	-?	-	0	0	-	++	0	++	0	++
SA191 (employment)	0	-?	0	0?	-	-?	?	0?	-	--?	0	-	++	0	++	+	++
SA363 (employment)	0	-?	0	0?	-	-?	--?	0?	-	--?	0	-	++	0	++	+	++
SA568b (residential – 300 dwellings)	++	++/-?	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	0	++
SA568a (employment)	0	++	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	+	++
SA568 (residential– 300 dwellings)	++	++/-	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	0	++
SA570 (employment)	0	++	0	0?	+	-?	--?	0?	-	-?	0	-	++	0	++	+	++
SA325 (employment)	0	++	0	0?	+	-?	--?	?	--?	--?	0	-	++	0	++	++	++
Lower Beeding																	
SA567 (residential – 30 dwellings)	++	+?	0	0?	+	-?	--?	-?	--?	-?	0	-	+	0	+	0	--
SA575 (residential – 20 dwellings)	++	+?	0	0?	+	-?	--?	-?	--?	0	0	-	+	0	+	0	--
SA584 (residential – 7 dwellings)	+	+?	0	0?	+	-?	--?	--?	--?	0	0	-	+	0	+	0	--

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA657 (residential – 20 dwellings)	++	+?	0	0?	+	-?	-?	0?	--?	0	0	-	+	0	+	0	--
SA729 (residential – 10 dwellings)	++	+?	0	0?	+	-?	-?	0?	--?	0	0	-	+	0	+	0	--
Partridge Green																	
SA063 (employment)	0	+	0	0?	++	--?	?	0?	--?	--?	0	-	+	0	+	+	+
SA274 (residential – 45 dwellings)	++	+?	0	0?	++	0?	-?	--?	--?	--?	0	-	+	0	+	0	+
SA320 (residential – 70 dwellings)	++	+/-?	0	0?	++	--?	-?	0?	--?	--?	0	-	+	0	+	0	+
SA433 (residential – 60 dwellings)	++	+?	0	0?	++	--?	-?	--?	--?	--?	0	-	+	0	+	0	+
SA634 (residential – 20 dwellings)	++	+/-?	0	0?	++	--?	-?	--?	--?	--?	0	-	+	0	+	0	+
Pulborough and Codmore Hill																	
SA112 (residential – 60 dwellings)	++	++/-?	0	0?	+	--?	--?	-?	-	--?	0	-	++	0	++	0	+
SA385 (employment)	0	++	0	0?	+	--?	--?	-?	--?	--?	0	-	+	0	+	+	+
SA445 (residential use – 170 dwellings)	++	++?	0	0?	++	--?	--?	--?	--?	--?	0	-	++	0	++	0	+/-
SA556 (residential – 25 dwellings)	++	++?	0	0?	++	--?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA588 (residential – 20 dwellings)	++	++?	0	0?	+	--?	--?	?	--?	--?	0	-	++	0	++	0	+
SA830 (employment)	0	++	0	0?	+	--?	--?	?	--?	--?	0	-	+	0	+	+	+
GA007 (Gypsy and Traveller use)	++	++/-?	+	0?	+	-?	-?	-?	+	--?	0	0	+	0	+	0	-

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
GA015 (Gypsy and Traveller use)	++	-?	+	0?	-	0?	--?	0?	+	--?	0	0	+	0	+	0	--
Rudgwick and Bucks Green																	
SA442 (residential – 15 dwellings)	++	+/-?	0	0?	++	-?	--?	-?	-	--?	0	-	+	0	+	0	--
SA574 (residential – 60 dwellings)	++	+?	0	0?	++	-?	--?	0?	--?	--?	0	-	+	0	+	0	--
SA683 (residential – 6 dwellings)	+	+/-?	0	0?	++	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
SA794 (residential - 6 dwellings)	+	+?	0	0?	-	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
GA009 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	-	0	-	0	-
Rusper																	
SA080 (residential – 12 dwellings)	++	+?	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
SA465 (residential – 6 dwellings)	+	+?	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
SA737 (residential – 5 dwellings)	+	+?	0	0?	+	-?	--?	-?	-	--?	0	-	+	0	+	0	--
SA872 (residential - 20 dwelling)	++	+?	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
GA008 (Gypsy and Traveller use)	++	-?	+	0?	-	0?	?	0?	+	--?	0	0	+	0	+	0	--
Small Dole																	
SA505 (residential – 10 dwellings)	++	-?	0	0?	+	-?	-?	0?	--?	--?	0	-	+	0	+	0	+
SA538 (residential – 40 dwellings)	++	-?	0	0?	+	-?	-?	-?	--	--?	0	-	+	0	+	0	+

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA689 (residential - 20 dwellings)	++	-?	0	0?	+	--?	-?	0?	--?	--?	0	-	+	0	+	0	+
Southwater																	
SA324 (residential – 15 dwellings)	++	++	0	0?	+	-?	-?	-?	--?	--?	0	-	++	0	++	0	+
SA644/SA645 (employment)	0	-?	0	0?	-	-?	?	-?	--?	--?	0	-	+	--	+	++	+
SA703 (employment)	0	++	0	0?	+	-?	--?	0?	--?	--?	0	-	++	0	++	+	++
SA701 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
SA725 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
SA743 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
Steyning																	
SA742 (residential – 240 dwellings)	++	++	0	0?	++	--?	-?	--?	--?	0	0	-	+	0	+	0	--
Storrington																	
SA361/SA732 (residential – 70 dwellings)	++	++?	0	0?	++	--?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA639 (residential – 50 dwellings)	++	++?	0	0?	++	--?	--?	-?	--?	--?	0	-	+	--	+	0	+
SA384 (residential - 75 dwellings)	++	++?	0	0?	++	--?	--?	-?	-	--?	0	-	+	--	+	0	+
Thakeham																	
SA039 (residential – 25 dwellings)	++	+/-?	0	0?	+	--?	?	0?	--	-?	-	-	+	0	+	0	+

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA513 (residential – 25 dwellings)	++	+/-?	0	0?	+	-?	--?	0?	--	--?	-	-	+	0	+	0	+
SA873 (residential – 40 dwellings)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
GA010 (Gypsy and Traveller use)	++	+?	+	0?	+	-?	--?	0?	+	--?	-	0	+	0	+	0	-
GA014 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	--?	--?	0	-	+	0	+	0	--
Warnham																	
SA070 (residential – 25 dwellings)	++	+?	0	0?	+	-?	--?	?	--?	--?	0	-	++	0	++	0	+
SA071 (residential – 20 dwellings)	++	+?	0	0?	+	0?	--?	0?	--?	--?	0	-	++	0	++	0	+
West Chiltonon Village and Common																	
SA066 (residential – 15 dwellings)	++	+?	0	0?	+	0?	-?	--?	--?	--?	0	-	+	0	+	0	--
SA429 (residential – 15 dwellings)	++	+/-?	0	0?	-	0?	--?	-?	--?	-?	-	-	-	0	-	0	+
SA500 (residential – 6 dwellings)	+	+?	0	0?	+	0?	-?	-?	--?	--?	-	-	+	0	+	0	-
GA004 (gypsy and traveller use)	++	+/-?	0	0?	-	0?	--?	0?	--?	--?	0	-	+	0	+	0	--

- 4.54 The SA of the small sites indicated that a range of both positive and negative effects could arise as a result of their development. It is possible to draw out some conclusions in relation to effects which are most apparent when considered at a settlement level.
- 4.55 It is notable that sites located at small towns and larger villages perform favourably in relation to both access to services and facilities (SA objective 2) and health and wellbeing (SA objective 5). This is particularly the case for sites at Billingshurst, Henfield, Pulborough and Codmore Hill, Steyning and Storrington. These larger settlements provide access to a range of services and facilities including healthcare. The smaller settlements of Rudgwick and Bucks Green, Cowfold and Partridge Green benefit from healthcare facilities but their smaller size means the range of services is more limited. Therefore, while there is a relatively positive effect expected in relation to access to services and facilities, the effect in relation to health and wellbeing is stronger than might be expected for a smaller settlement.
- 4.56 Particular benefits in relation to transport (SA objective 13) and climate change (SA objective 15) were noted where sites are close to settlements which provide access to a railway station i.e. at Billingshurst, Christ's Hospital, Horsham town, Pulborough and Codmore Hill and Warnham. Conversely, where sites are at a settlement which contains or is functionally linked to an AQMA, adverse impacts are expected in relation to air quality (SA objective 14). This is the case for the sites at Cowfold and Storrington.
- 4.57 Many existing developments on the edges of settlements including Ashington, Barns Green, Billingshurst, Christ's Hospital, Cowfold, Henfield, Lower Beeding, Pulborough and Codmore Hill, Rudgwick and Bucks Green, Rusper, Southwater, Storrington, Thakeham and Warham were identified as having no/low or low-moderate landscape capacity for new development. Sites at these settlements performed particularly poorly in relation to landscape (SA objective 7). It was not possible to make similarly definitive conclusions in relation to potential impacts relating to heritage assets (SA objective 8) as the impacts of development in relation to this issue are more site-specific and dependent upon the intricacies of interrelationships between existing elements of the built environment.
- 4.58 The sites proposed for allocation are shown in Chapter 7, as part of the appraisal of policies included in the Regulation 19 Local Plan. Considering the summary of effects for the small site options, it was not possible to state definitively that the sites proposed for allocation perform more positively across the SA objectives than the reasonable alternatives that have not been allocated. This is because the sites are of different scales and different uses, and the sites not only need to be compared as a whole but on a settlement by settlement basis. It also depends upon the SA objectives being considered. In most instances, the differences between them are not particularly marked.

4.5 Spatially specific growth scenarios

- 4.59 Drawing on the appraisals of the five quanta of growth options, the six overall spatial strategy options, and the large and small-scale site options, the Council identified nine spatially specific growth scenarios at the Regulation 18 stage that could be taken forward in the Local Plan Review and these were also subject to SA.
- 4.60 The growth scenario options related to either lower, medium or higher growth scenarios. They included different combinations of large and small site options to ensure that all reasonable alternative options relating to the distribution of growth in the District had been appraised. Following consultation on the Regulation 18 Local Plan, further testing was undertaken through the SA to ensure that all additional reasonable alternative growth scenarios were considered. In total, 14 growth scenario options were subject to appraisal. The appraisal work is presented in detail in Chapter 7 of the draft Regulation 19 LUC SA Document, although the appraisal table is included as Table 4.7 overleaf for reference.
- 4.61 The explanation for the combination of different sites included within each of the fourteen alternative Growth Scenario Options is presented below. The Preferred Strategy for the Local Plan taken forward to the 2021 draft Regulation 19 Document was also appraised alongside the 14 alternative growth scenario options.
- 4.62 Each growth scenario was linked to the quantum of growth options and spatial strategy options which were considered as part of the early stages of the SA. For each strategic site the level of housing considered was approximate. While the number of homes tested at each site provided a means of testing the likely effects of development, it was recognised that some variation could occur in the number of homes provided at these sites as development proposals were worked up. It was expected that any change in the level of development would not be substantially higher or lower so as to result in materially different effects than those identified.
- 4.63 The total new homes figure for each option related to the whole plan period and referred to housing delivery on sites that are not already committed. Some 8,063 homes already had planning permission or were otherwise identified for development in 2021 and the Council also had evidence that 1,875 windfall units would also be delivered during the plan period. The appraisal work therefore related to the effects over and above those of the already-committed development, windfall housing or homes already completed.

Lower growth scenarios (Quantum of Growth Option 1)

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

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

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

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

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

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

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

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

This scenario allocates strategic sites only at settlements that are considered to potentially have good access to an existing rail station. Land west of Southwater is included because Southwater has an existing high frequency and convenient bus service to Horsham Town centre and Horsham Rail Station. The additional small site allocation total reflects the settlement hierarchy, considering active travel opportunities to local shops and services.

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

This scenario accommodates a low to medium level of growth. It includes all three of the new settlement proposals but does not include any major settlement extensions. However, it necessitates a high level of growth from smaller sites at settlements within the settlement hierarchy to reflect a more ambitious level of housing growth compared to Scenario 1b. It

comprises a hybrid of Spatial Strategy Options 2 and 3 (proportionate growth strategy and new garden towns).

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

Medium growth scenarios (Quantum of Growth Option 2)

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

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

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

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

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

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

■ **Scenario 2e: medium growth A24/A264 corridor focus (including the large scale site at Kingsfold) (Total new homes: approximately 11,275) (new scenario)**

This scenario accommodates a medium level of growth. It includes large scale sites focussed along the A24/A264 corridor at Kingsfold, Horsham town, Buck Barn and towards Crawley. It also allows for some development at Billingshurst. It comprises a hybrid of Spatial Strategy Options 1, 3, 4 and 5 (existing settlement hierarchy strategy, new garden towns, new urban extensions and employment strategy).

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

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

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

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

■ **Scenario 2g: medium growth urban extension and small sites option (Total new homes: approximately 11,875)**

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

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

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

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

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

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

■ **Scenario 3b: higher growth urban extension and small sites (Total new homes: approximately 14,975)**

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

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

■ **Scenario 3c: Maximum growth, all available sites (i.e. all reasonable alternatives, strategic and small sites, the rejected Horsham Golf & Fitness site⁴ plus 1,500 from other rejected sites (Total new homes: approximately 21,225) (new scenario)**

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

⁴ Given that the Horsham Golf and Fitness site is not considered suitable for development by the Council as it does not meet the criteria set out in the Council's Site Assessments Report, it is only included in the Maximum Growth Scenario which would require the development of all reasonable alternatives.

strategy).

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

Preferred Strategy taken forward in Regulation 19 Local Plan

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

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

Table 4.6 Growth scenario options considered for the Horsham District Local Plan and subject to Sustainability Appraisal

Site names	Lower Growth Scenarios				Medium Growth Scenarios							Higher Growth Scenarios			Preferred Strategy
	Scenario 1a: settlement hierarchy - urban extension	Scenario 1b: new settlement option	Scenario 1c: relating to access to sustainable transport	Scenario 1d: new settlements and small sites only	Scenario 2a: new settlement plus settlement hierarchy (Mayfield)	Scenario 2b: new settlement plus settlement hierarchy (Adversane)	Scenario 2c: new settlement plus settlement hierarchy (Buck Barn)	Scenario 2d: new settlement with east-west spread (Mayfield), urban extension West of Billingshurst, without Kilnwood Vale & expand medium settlements	Scenario 2e: A24/A264 corridor focus (Kingsfold)	Scenario 2f: east central focus - 2 new settlements, smaller Crawley expansion & all reasonable alternative small sites (Kilnwood Vale)	Scenario 2g: urban extension and small sites option	Scenario 3a urban extension and new settlements	Scenario 3b: urban extension and small sites	Scenario 3c: maximum growth, all available sites (i.e. all reasonable alternatives, strategic and small sites, plus 1,500 from other rejected sites)	
West of Ifield	3,250	0	3,250	0	3,250	3,250	3,250	3,250	3,250	0	3,250	3,250	3,250	3,250	3,250
East of B'hurst	650	0	650	0	650	650	650	0	650	650	650	650	650	650	650
West of S'water	1,200	0	1,200	0	1,200	1,200	1,200	1,200	0	1,200	1,200	1,200	1,200	1,200	1,200
North Horsham densified	500	0	500	0	500	500	500	500	500	500	500	500	500	500	500
West of Kilnwood Vale	350	0	0	0	350	350	350	0	350	350	350	350	350	350	350
Rookwood	725	0	725	0	725	725	725	725	725	0	725	725	725	725	0
Mayfield	0	2,000	0	2,000	2,000	0	0	2,000	0	0	0	2,000	0	2,000	0
Land East of Kingsfold	0	0	0	0	0	0	0	0	1,300	0	1,300	1,300	1,300	1,300	0
Adversane	0	2,000	0	2,000	0	2,000	0	0	0	2,000	0	2,000	0	2,000	0
Land at Buck Barn	0	2,000	0	2,000	0	0	2,000	0	2,000	2,000	0	2,000	0	2,000	2,000
West of B'hurst	0	0	1,000	0	0	0	0	1,000	0	0	1,000	1,000	1,000	1,000	0
Ashington cluster	400	0	0	0	400	400	400	0	0	0	400	0	400	400	0
Small sites	550	2,050	2,500	3,700	2,500	2,500	2,500	2,500	2,500	4,100	2,500	0	5,600	6,150	2,500
Total	7,625	8,050	9,825	9,700	11,575	11,575	11,575	11,175	11,275	10,800	11,875	14,975	14,975	21,525	10,450

- 4.64 This stage of work was significant in helping the Council to recommend a growth scenario which both met the Local Plan objectives whilst performing well against SA objectives, in the context of meeting development needs in full. This strategy focussed on urban extensions, with additional housing needs to be delivered through the provision of a new settlement (noting that this new settlement option is no longer considered appropriate). As shown in Table 4.6, the Preferred Strategy was nearest to Scenario 2c (Scenario 2c: new settlement plus settlement hierarchy (Buck Barn)) albeit excluding the Rookwood and Ashington Cluster site proposals. The appraisal of the Preferred Strategy demonstrated that it performed strongly against the SA objectives compared with other medium-growth scenarios. The differences in outcomes for four of the seven medium-growth scenarios (2a, 2b, 2c and 2d) were marginal, with the minor differences recorded being due to the respective new settlement scenarios.
- 4.65 The draft Regulation 19 Preferred Strategy (as presented in July 2021) built on the settlement hierarchy (including sustainable urban extensions), whilst also planning for a new garden village. The strategy sought to achieve the strategic benefits of larger scale strategic growth (e.g. new infrastructure and boosted housing supply) with the local benefits of some growth around existing smaller settlements (e.g. local community infrastructure, and improving the viability of village services). With regard to potential new settlement proposals, the SA indicated that two prospective sites performed more favourably against SA objectives: Land at Adversane and Land at Buck Barn. Of these, Buck Barn was considered to offer the best opportunity to achieve a new village community in its own right, whilst also providing high quality bus access to Horsham Town (the District's largest settlement), plus onward links to the Crawley and Gatwick areas to the north, and Worthing to the South, and the employment opportunities therein. The SA also scored this site higher against landscape and biodiversity objectives compared with the Adversane site.

5.0 Development of Local Plan to July 2021: Assessment of the draft Local Plan

5.1 This chapter presents a summary of the Sustainability Appraisal of the policies in the July 2021 Cabinet version of the Local Plan as reported in the draft Regulation 19 LUC SA Document in 2021.

5.1 SA findings for non-site policies in the July 2021 Cabinet version of the Local Plan

5.2 ‘Non-site policies’ refers to thematic policies that are not allocating any site for development (for example biodiversity requirements, climate change, affordable housing). Some of these policies have, since July 2021, been amended in the current Regulation 19 Local Plan to respond to the revisions in the NPPF, the publication of Natural England’s position statement on water neutrality in September 2021, and other circumstantial changes. The amended policies have therefore been subject to further Sustainability Appraisal and the results of these appraisals are presented in Chapter 7. A fuller account of the SA carried out by LUC is included in the draft Regulation 19 LUC SA Report (July 2021) available to view on the Council’s website: <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>.

5.3 Tables 5.1 to 5.8 summarise the appraisal of the non-site policies against the SA/SEA objectives.

Table 5.1: SA findings for Policies 1 to 5 in the 2021 draft Local Plan (Policies for Growth and Change)

SA objective	Strategic Policy 1: Sustainable Development	Strategic Policy 2: Development Hierarchy	Strategic Policy 3: Settlement Expansion	Strategic Policy 4: Horsham Town	Strategic Policy 5: Broadbridge Heath Quadrant
SA1: Housing	+	+	++	+	+
SA2: Services and facilities	0	++/-	++/-	++	++
SA3: Inclusive communities	0	++	+	+	+
SA4: Crime	0	0	0	0	+?
SA5: Health and wellbeing	0	+/-	+/-	++	++/--
SA6: Bio & geodiversity	0	0	0	+	+?
SA7: Landscape	0	+	+	+	+?
SA8: Historic environment	0	+	+	+	+/-?
SA9: Efficient land use	0	++	0	0	+
SA10: Natural resources	0	0	0	0	0
SA11: Water resources	0	0	0	+	0
SA12: Flooding	0	0	0	+	0
SA13: Transport	0	+/-	+/-	++	++/-
SA14: Air quality	0	+/-	+/-	+	+/-
SA15: Climate change	0	+/-	+/-	+	+/-
SA16: Economic growth	+	0	+	++	++
SA17: Employment	0	+/-	++/-	++	++/-

Table 5.2: SA findings for Policies 6 to 13 in the 2021 draft Local Plan (Economic Development)

SA objective	Strategic Policy 6: New Employment	Strategic Policy 7: Enhancing Existing Employment	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses	Policy 10: Equestrian Development	Strategic Policy 11: Tourism Facilities and Visitor Accommodation	Strategic Policy 12: Retail Hierarchy and Town Centre First Principles	Strategic Policy 13: Town Centre Uses
SA1: Housing	0	0	0	+	0	0	0	+
SA2: Services & facilities	++	+/-	0	0	0	+	++	++
SA3: Inclusive communities	+	+	+	0	0	+	++	++
SA4: Crime	0?	0?	0	0	0	0	0	0
SA5: Health and wellbeing	+	+/-	+/-	0	0	0	+	+
SA6: Bio & geodiversity	--?	-?	+	+	0	0	0	0
SA7: Landscape	--?	+/-?	+	+	+	+	+	+
SA8: Historic environment	--?	+/-?	+	+	+	+	+	+
SA9: Efficient land use	--	+	0	+	+	+	0	0
SA10: Natural resources	-?	-?	0	0	0	0	0	+
SA11: Water resources	0	0	0	0	0	0	0	0
SA12: Flooding	-	0	0	0	0	0	0	0
SA13: Transport	+/-	+	-	0	0	+	+	+
SA14: Air quality	+/-	+/-	-	0	0	+	+	+
SA15: Climate change	+/-	+	-	0	0	+	+	+
SA16: Economic growth	++	++	++	0	+	++	++	++
SA17: Employment	++	++	++	0	0	+	+	+

Table 5.3 SA findings for Policies 6 to 13 in the 2021 draft Local Plan (Economic Development)

SA objective	Strategic Policy 6: New Employment	Strategic Policy 7: Enhancing Existing Employment	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses	Policy 10: Equestrian Development	Strategic Policy 11: Tourism Facilities and Visitor Accommodation	Strategic Policy 12: Retail Hierarchy and Town Centre First Principles	Strategic Policy 13: Town Centre Uses
SA1: Housing	0	0	0	+	0	0	0	+
SA2: Services & facilities	++	+/-	0	0	0	+	++	++
SA3: Inclusive communities	+	+	+	0	0	+	++	++
SA4: Crime	0?	0?	0	0	0	0	0	0
SA5: Health and wellbeing	+	+/-	+/-	0	0	0	+	+
SA6: Bio & geodiversity	--?	-?	+	+	0	0	0	0
SA7: Landscape	--?	+/-?	+	+	+	+	+	+
SA8: Historic environment	--?	+/-?	+	+	+	+	+	+
SA9: Efficient land use	--	+	0	+	+	+	0	0
SA10: Natural resources	-?	-?	0	0	0	0	0	+
SA11: Water resources	0	0	0	0	0	0	0	0
SA12: Flooding	-	0	0	0	0	0	0	0
SA13: Transport	+/-	+	-	0	0	+	+	+
SA14: Air quality	+/-	+/-	-	0	0	+	+	+
SA15: Climate change	+/-	+	-	0	0	+	+	+
SA16: Economic growth	++	++	++	0	+	++	++	++
SA17: Employment	++	++	++	0	0	+	+	+

Table 5.4 SA findings for Policies 14 to 23 in the 2021 draft Local Plan (Housing)

SA objective	Strategic Policy 14: Housing Provision	Strategic Policy 15 - Meeting Local Housing Needs	Strategic Policy 16 - Affordable Housing	Policy 17- Improving Housing Standards in the	Policy 18 - Rural Exception Homes	Policy 19 - Retirement Housing and Specialist Care	Policy 20 – Gypsies and Travellers	Policy 21 - Rural Workers' Accommodation	Policy 22 - Replacement Dwellings and House Extensions in the Countryside	Policy 23 - Ancillary Accommodation
SA1: Housing	++	++	++/-?	++	++	++	++	+	++	+
SA2: Services & facilities	++/-	0	0	0	+/-	+	+/-	-	0	0
SA3: Inclusive communities	+/-	+	+	+	+	++	++	+	0	+
SA4: Crime	0	0	0	0	0	0	0	0	0	0
SA5: Health & wellbeing	++/--	0	0	+	0	+	+/-	0	0	0
SA6: Bio & geodiversity	--?	0	0	0	0	0	-?	0	+	0
SA7: Landscape	--?	+	0	+	+/-	0	--/+?	+	+	+
SA8: Historic environ.	--?	+	0	+	+/-	0	+/-?	+	+	+
SA9: Efficient land use	--/+	0	0	0	-	0	+/-	+	+	+
SA10: Natural resource	--?	0	0	0	0	0	--/+	0	0	0
SA11: Water resources	-?	0	0	0	0	0	+/-	0	0	0
SA12: Flooding	--?	0	0	+	0	0	+/-	0	0	0
SA13: Transport	++/-?	0	0	0	+/-	+	+/-	-	0	0
SA14: Air quality	++/--	0	0	0	+/-	+	+/-	-	0	0
SA15: Climate change	++/-	0	0	0	+/-	+	+/-	-	0	0
SA16: Economic growth	++/-	0	0	0	0	0	0	++	0	0
SA17: Employment	++/-	0	0	0	+/-	0	--/+	++	0	0

Table 5.5 SA findings for Policies 24 to 31 in the 2021 draft Local Plan (Conserving and Enhancing the Natural Environment)

SA objective	Strategic Policy 24: Environmental Protection	Policy 25: Air Quality	Strategic Policy 26: The Natural Environment and Landscape Character	Strategic Policy 27: Countryside Protection	Policy 28: Settlement Coalescence	Policy 29: Protected Landscapes	Strategic Policy 30: Green Infrastructure and Biodiversity	Policy 31 Local Greenspace	Consideration of potential Green Belt designation in the District
SA1: Housing	0	0	+	+	-?	-?	0	0	-?
SA2: Services & facilities	0	0	+	+	0	0	0	0	+/-?
SA3: Inclusive communities	0	0	+	+	0	0	0	+	+/-?
SA4: Crime	0	0	0	0	0	0	0	0	0
SA5: Health and wellbeing	+	+	0	+	0	+	+	+	+/-?
SA6: Bio & geodiversity	++	++	++	++	++	++	++	++	++
SA7: Landscape	+	+	++	++	++	++?	+	+	++
SA8: Historic environment	0	0	+	+	+	+	0	+	+
SA9: Efficient land use	++	0	+	+	0	0	0	0	+
SA10: Natural resources	0	0	0	+	0	0	0	0	0
SA11: Water resources	++	0	+	0	0	0	++	0	0
SA12: Flooding	+	0	++	+	+	+	+	+	+
SA13: Transport	0	++	0	+	+	0	+	0	+/-?
SA14: Air quality	++	++	+	+	+	0	+	0	+/-?
SA15: Climate change	++	++	+	+	+	0	++	0	+/-?
SA16: Economic growth	0	0	+	+?	-?	+/-	0	0	-?
SA17: Employment	0	0	0	0	0	0	0	0	+/-?

Table 5.6 SA findings for Policies 32 to 35 in the 2021 draft Local Plan (Development Quality, Design and Heritage)

SA objective	Strategic Policy 32: Development Quality	Strategic Policy 33: Development Principles	Strategic Policy 34: Heritage Assets and Managing Change within the Historic Environment	Policy 35: Shop Fronts and Advertisements
SA1: Housing	+	+	0	0
SA2: Access to services and facilities	0	0	0	0
SA3: Inclusive communities	+	+	0	+
SA4: Crime	+	+	0	0
SA5: Health and wellbeing	+	+	0	0
SA6: Biodiversity and geodiversity	+	+	+	0
SA7: Landscape	++	++	++	++
SA8: Historic environment	++	+	++	++
SA9: Efficient land use	+	++	0	0
SA10: Natural resources	0	0	0	0
SA11: Water resources	+	0	0	0
SA12: Flooding	+	+	0	0
SA13: Transport	+	+	0	0
SA14: Air quality	+	+	0	0
SA15: Climate change	+	+	0	0
SA16: Economic growth	+	+	0	+
SA17: Access to employment opp.	0	0	0	0

Table 5.7 SA findings for Policies 36 to 39 in the 2021 draft Local Plan (Climate Change and Flooding)

SA objective	Strategic Policy 36: Climate Change	Strategic Policy 37: Appropriate Energy Use	Policy 38: Sustainable Design and Construction	Strategic Policy 39: Flooding
SA1: Housing	+	0	0	0
SA2: Access to services & facilities	0	0	0	0
SA3: Inclusive communities	0	0	+	0
SA4: Crime	0	0	0	0
SA5: Health and wellbeing	+	0	0	0
SA6: Biodiversity and geodiversity	+	0	0	+
SA7: Landscape	+	+	0	0
SA8: Historic environment	0	0	+	0
SA9: Efficient land use	+	0	0	0
SA10: Natural resources	+	0	+	0
SA11: Water resources	+	0	++	+
SA12: Flooding	++	0	0	++
SA13: Transport	+	0	0	0
SA14: Air quality	+	0	0	0
SA15: Climate change	++	++	++	+
SA16: Economic growth	0	+	0	0
SA17: Access to employment opp.	0	0	0	0

Table 5.8 SA findings for Policies 40 to 45 in the 2021 draft Local Plan (Infrastructure, Transport and Healthy Communities)

SA objective	Strategic Policy 40: Infrastructure Provision	Strategic Policy 41: Sustainable Transport	Policy 42: Parking	Policy 43: Gatwick Airport Safeguarding	Strategic Policy 44: Inclusive Communities, Health and Wellbeing	Policy 45: Community Facilities, Leisure and Recreation
SA1: Housing	+	0	0	+/-	+	0
SA2: Services and facilities	++	++	+	0	++	++
SA3: Inclusive communities	++	++	+	0	++	++
SA4: Crime	+	0	+	0	+	+
SA5: Health and wellbeing	++	+	+/-	-?	++	++
SA6: Bio & geodiversity	0	0	0	-?	0	+
SA7: Landscape	0	0	0	-?	0	+
SA8: Historic environment	0	0	0	-?	0	0
SA9: Efficient land use	0	0	0	0	0	0
SA10: Natural resources	0	0	0	0	0	0
SA11: Water resources	+	0	0	0	0	0
SA12: Flooding	0	0	0	0	0	0
SA13: Transport	+	++	+/-	-	+	+
SA14: Air quality	+	++	+/-	-	+	+
SA15: Climate change	+	++	+/-	-	+	+
SA16: Economic growth	0	++	+	++	+	0
SA17: Employment	0	++	++	+	++	0

5.2 SA findings for policies allocating strategic sites in the 2021 draft Local Plan (Strategic sites)

5.3 This following section presents LUC’s appraisal of policies allocating strategic sites to meet the needs of the District. In Table 5.9 below, the first column reflects the appraisal of that site without any mitigation (i.e. a ‘policy off’ appraisal). While the second column reflects the appraisal of the site with mitigation included within the site allocation policy (and in the overarching Strategic Policy HA1: Strategic Site Development Principles),

5.4 The ‘policy off’ appraisal of the strategic sites and more detailed justification for the effects recorded is provided in Appendix D of the draft Regulation 19 LUC SA Report.

- 5.5 Since LUC's appraisal of the four strategic sites proposed for allocation in July 2021, the impact of water neutrality on housing delivery has reduced the overall amount of development that is demonstrably deliverable in the District over the Plan period. Of the four sites included in the following appraisal, Land at Buck Barn performed the least favourably when considered against the Local Plan objectives – it has therefore been removed as an allocation. Explanation for this removal can be found in Table 7.1 of this document.
- 5.6 Chapter 8 of this document sets out the potential for cumulative effects with other developments proposed in the Local Plan. It also identifies the policies with the most direct relevance in terms of mitigation and strengthening positive effects of development at the site.
- 5.7 It should be noted that at the time of the LUC appraisal in 2021, in addition to the allocations set out in the policies in the Local Plan, there were approximately 8,063 homes that already had planning permission or were otherwise identified for development. These were primarily located at Horsham, Billingshurst, Southwater and the existing Kilnwood Vale allocation site. The development proposed in the Local Plan could combine with existing development and the commitments to strengthen any effects identified by the SA in these locations.

Table 5.9: SA findings for Policies allocating strategic sites in the 2021 draft Local Plan (Strategic sites)

SA objective	Strategic Policy HA2: West of Crawley Area of Search & Land West of Ifield		Strategic Policy HA3: Land West of Southwater Strategic Site		Strategic Policy HA4: Land East of Billingshurst (Little Daux) Strategic Site		Strategic Policy HA5: Land at Buck Barn Strategic Site	
	Site SA101	Site SA101 considering mitigation in Policies HA1 and HA2	Site SA119	Site SA119 considering mitigation in Policies HA1 and HA3	Site SA118	Site SA118 considering mitigation in Policies HA1 and HA4	Site SA716	Site SA716 considering mitigation in Policies HA1 and HA5
SA1: Housing	++	++	++?	++	++	++	++	++
SA2: Services & facilities	++?	++?	++?	++?	+/-?	++/-?	++/-?	++/-?
SA3: Inclusive communities	+?	+?	+?	+?	+?	+?	0	+?
SA4: Crime	0?	0?	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?
SA6: Bio & geodiversity	--?	++/-?	--?	--/+?	--?	--/+?	--/+?	--/+?
SA7: Landscape	--?	--/+?	--?	--/+?	-?	+/-?	-?	+/-?
SA8: Historic environment	--?	--/+?	--?	--/+?	--?	--/+?	--?	--/+?
SA9: Efficient land use	-	-	--?	--?	--?	--?	--?	--?
SA10: Natural resources	--?	--?	--?	--?	--?	--?	--?	--?
SA11: Water resources	-?	+/-?	0	0	-?	+/-?	0	0
SA12: Flooding	-?	+/-?	-?	-?	-?	-?	-?	+/-
SA13: Transport	++/-?	++/-	++/-?	++/-?	++/-?	++/-?	--/+?	++/-?
SA14: Air quality	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	--/+?	++/-?
SA15: Climate change	+/-?	++/-?	+/-?	++/-?	+/-?	++/-?	++/-?	++/-?
SA16: Economic growth	++	++	++	++	++	++	++?	++?
SA17: Employment	++	++	+/-?	++/-?	+/-?	++/-?	--/+	++/-

5.3 SA findings for policies allocating small sites in and around the towns and villages

5.8 A similar appraisal was carried out for each of the small sites considered for the Local Plan. This is provided in Appendix E of the draft Regulation 19 LUC SA Report. The LUC report found that a range of both positive and negative effects could arise as a result of their development. Sites at the Main Town (Horsham) or a Small Town or Larger Village in the District performed favourably in relation to both access to services and

facilities and health and wellbeing. It was noted that in smaller settlements the range of services and facilities accessible at these locations is more limited hence this effect was lesser. Specific characteristics (e.g. presence of a rail station, functional links to an Air Quality Management Area, and particular landscape sensitivities) were noted to have positive or negative effects on relevant objectives.

- 5.9 Because further information on the small sites has been submitted since LUC undertook its initial appraisals in 2021, the small site appraisals have been revisited in Chapter 7. Table 7.3 explains the changes made to each site and assesses whether the change is considered significant in terms of sustainability. If the impact was deemed to be significant, a re-appraisal of the small site was undertaken and has been presented in Table 7.4.

6.0 Water Neutrality and the Local Plan

- 6.1 All of Horsham District, most of Crawley Borough, and parts of Chichester District, Mid Sussex District and the South Downs National Park – all in West Sussex County - fall within the Southern Water Sussex North Water Resource Zone (WRZ) as shown in Figure 6.1. Joint working in relation to water supply in these areas has been taking place since 2020.
- 6.2 Natural England initially raised concerns in relation to water supply and the impact over abstraction could have on protected sites within the Sussex North Water Resource Zone in a letter to JBA Consulting on 25th March 2020. On 14th September 2021, the authorities also received a Position Statement from Natural England (<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district>), advising them that Natural England had concerns that water abstraction for drinking water supplies could be having a negative impact on the wildlife sites in the Arun Valley. Natural England advised that any new development taking place in the area must not add to this negative impact.

“The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;

- *Arun Valley Special Area Conservation (SAC)*
- *Arun Valley Special Protection Area (SPA)*
- *Arun Valley Ramsar Site.*

As it could be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact.”

(Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach)

- 6.3 The Position Statement affects all of the land that falls within the Southern Water Sussex North Water Resource Zone.
- 6.4 The water supply in question is sourced from abstraction points in the Arun Valley, which also includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/ Special Area of Conservation (SPA/SAC) and Ramsar site (the Arun Valley Sites). The Arun Valley Sites are of international importance because of their inland water bodies, bogs, marshes, humid grassland, other water-dependent habitats, and overwintering waterfowl.

6.5 The Habitats Regulations 2017 (as amended) requires Local Authorities to demonstrate that there is no adverse ‘in combination’ impact on the integrity of SPAs and SACs. This means that by law, the Councils must prepare Local Plans that clearly shows that they will not have an adverse (or negative) effect on these important wildlife sites.

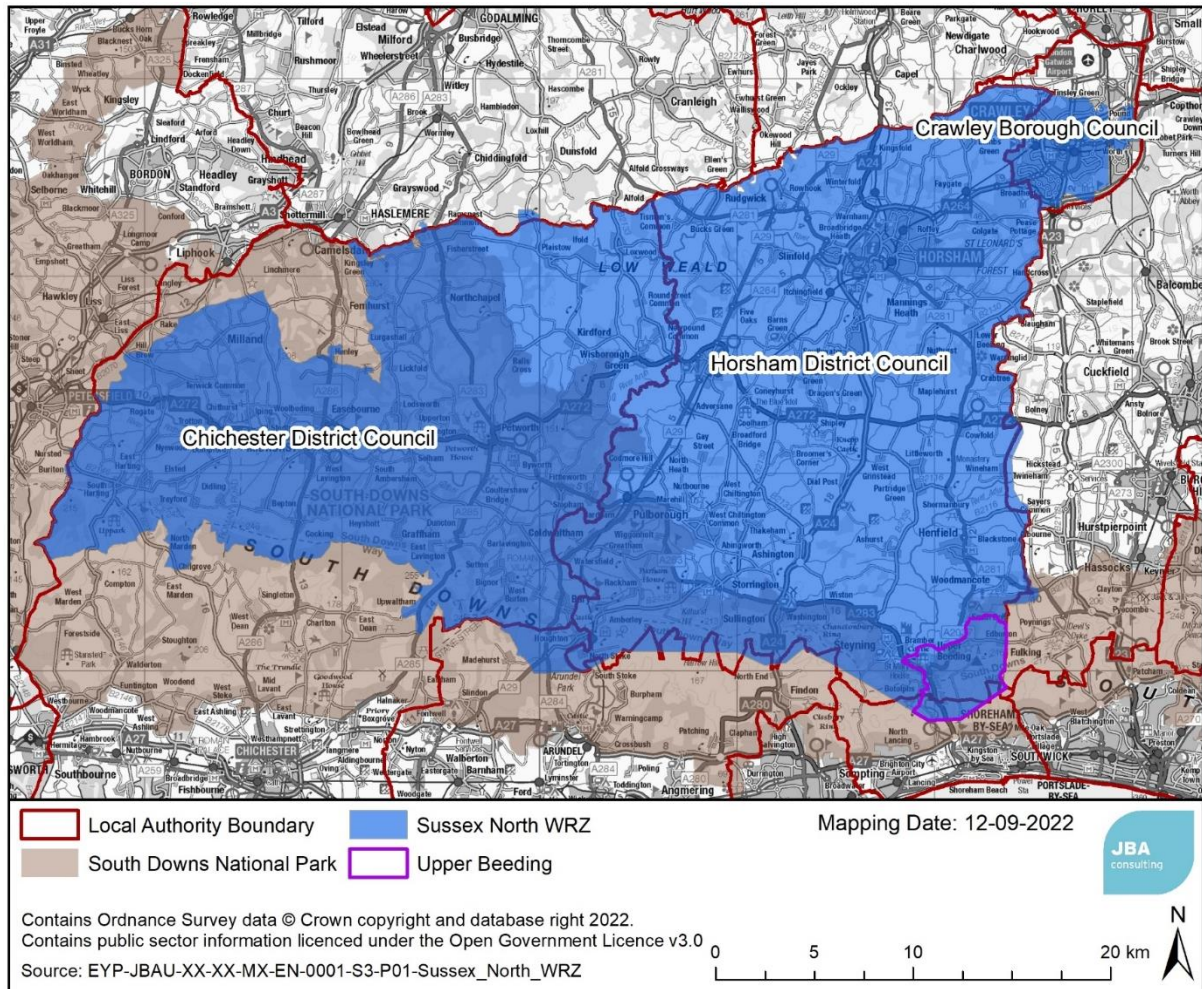


Figure 6.1: Southern Water Sussex North Water Resource Zone (WRZ)

6.6 One way of preventing any further negative impact is to ensure that all new development is water neutral. Water neutrality is defined as ‘development which does not increase the rate of water abstraction for drinking water supplies above existing levels’.

6.7 Water neutrality has significant impacts for the Local Plan, Neighbourhood Plans and Development Management. Since September 2021, only planning applications that can demonstrate that they will not have an additional impact on water supply have been able to be permitted. A limited number of applications have been approved on this basis, however, it is difficult to do this on an individual basis because the Habitats Regulations require an analysis of ‘in combination’ impacts. In combination impacts can lead to significant potential for double counting and contradictory decisions, and

the Development Management systems currently available to each affected authority are not set up to manage in combination impacts, without further work being undertaken to develop a Water Neutrality Strategy and Implementation Scheme. This work is currently being undertaken.

6.1 Water Neutrality work carried out to date, and Joint Working

- 6.8 The affected local authorities have been working together closely to ensure that their Local Plans take a consistent approach which will ensure ‘in combination’ water neutrality. Whilst the different timelines for progression of the plans means that it was not possible to have a joint set of plan policies or a formal joint SA, the authorities have closely aligned their work and the evidence underpinning the Plans has been undertaken jointly meaning they have been able to produce a joint Water Neutrality policy which has been included in all affected Local Plans.
- 6.9 Detail of the progress and the work taken place is set out in the Local Authorities’ Joint Water Neutrality Topic Paper (May 2023). A summary of the evidence secured to advise the authorities on this matter is set out in the following paragraphs of this Chapter.
- 6.10 The first stage of the work on water neutrality was carried out prior to Natural England issuing their Position Statement in September 2021. This arose from the joint Water Cycle Study commissioned by Crawley Borough, Horsham District, Mid Sussex District and Reigate and Banstead Borough Councils (August 2020). The advice from Natural England at that time was that water resources could only be addressed at a strategic level. Since the Water Supply Zone affected also included Chichester District, the three Local Authorities, in discussion with Natural England and HRA consultants appointed by the councils, agreed to undertake further evidence work through a joint commission which is the Water Neutrality Study undertaken by JBA Consulting. Part A of the Water Neutrality Study was prepared on an individual Local Authority basis, with JBA preparing the evidence jointly for Chichester District and Crawley Borough (July 2021), and AECOM providing the evidence for Horsham District (July 2021) as part of the HRA undertaken for the emerging Horsham District Local Plan.
- 6.11 The second stage of the work (Part B) considered the total (or cumulative) impact of proposed development in all the Local Authority areas that use Sussex North Water Supply Zone. The purpose of this work was to understand how water demand may increase in the future and work out how much water will need to be ‘offset’ through Water Neutrality. This work was completed and published in April 2022.

- 6.12 The third stage of the work (Part C) builds upon and updates previous work and sets out a water neutrality strategy for all affected authorities. This includes recommending a policy approach with regards to water efficiency standards in new development and setting out principles for an offsetting scheme, which together would allow water neutrality to be achieved despite growth identified in Local Plans. The report for this stage of work was published in December 2022, having been agreed as a basis for ongoing joint work by the commissioning local authorities' chief executive officers, and endorsed by Natural England. Reports for this and previous stages can be found at www.horsham.gov.uk/planning/local-plan-review-evidence-base.
- 6.13 A further consideration is the HRA. An Appropriate Assessment has been undertaken for the Local Plan by Aecom. This supports the provision of a new Water Neutrality policy, and also supports the recommendations included within the December 2022 'Part C Study' setting out the Water Neutrality Strategy. It concludes that the requirement for any new development within Horsham District demonstrate water neutrality will ensure that no adverse effects on the integrity of the Arun Valley SPA and Ramsar site will result from the Horsham Local Plan and increased water demand.
- 6.14 Further to the high-level strategy, appropriate governance structures have been put in place and a joint project manager recruited. A procurement exercise to obtain accurate costings for implementing mitigation measures or offsetting, and development of the detailed processes and procedures for running and reporting a local authority-led water neutrality implementation (offsetting) scheme, is underway.
- 6.15 There is ongoing commitment to work jointly on these matters. This, where relevant, has led to the assessment of common policy options and issues as part of the sustainability appraisal process.

6.2 Water Efficiency and offsetting new water supply

- 6.16 The issues of water efficiency and scale of development are interlinked because the more water efficient new developments are (through local plan policies), the less offsetting will be required, meaning more development can be permitted with the available offsetting capacity. However, the potential for both water efficiency and offsetting are finite, which may constrain the amount of development possible in an area. Some site promoters are proposing their own bespoke schemes which eliminate the need for mains water supply, for example utilising on-site boreholes and water treatment centres, which creates some uncertainty over the demand for offsetting that will be required overall in the District.

6.17 The Water Neutrality Part C study notes that jointly, the local planning authorities in the Sussex North Water Resource Zone (WRZ) propose to deliver nearly 20,000 units between them until 2039/40. This development will be supported by additional school places and other associated infrastructure and employment land as part of their emerging Local Plans. Table 6.1 is taken from the Water Neutrality Part C study (Executive Summary, and Tables 3.1 and 3.2), and represents a snapshot in time and not necessarily reflecting currently proposed levels of development.

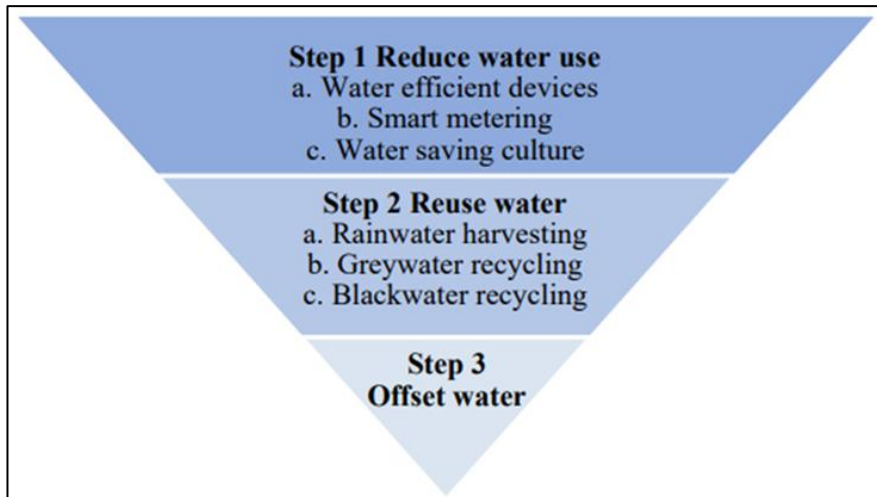
Table 6.1: Houses and employees in current and emerging Local Plans, before water neutrality considerations, within Sussex North WRZ

LPA	No. houses within current / proposed Local Plan period (without full planning permission)	Indicative number of employees
Crawley BC	3,960	5,780
Chichester DC	1,796	None identified in Sussex North
Horsham DC	12,800	4,590
SDNP	1,244	345
Total	19,800	10,715

6.18 Development in the local plans of each of the affected local authority areas will need to be supported by infrastructure to meet the needs of new communities, and not create additional burdens on existing provision that may also be subject to Water Neutrality requirements. Growth in household population is expected to lead to an increase in the number of school places required, with a resulting increase in water demand, either from new schools, or from an increase in the number of pupils at existing schools. West Sussex County Council estimate the number of new school places required during the plan period and have used this information to inform the Water Neutrality study. The average water use, and estimated number of new school places were used to calculate a 'water demand from new school places in Sussex North'. This figure was found to be 0.18MI/d by the end of the Water Neutrality Strategy period.

6.19 Parts A and B of the Water Neutrality Study had already concluded that water neutrality would be possible only through a combination of improved water efficiency, offsets and probably reduced housing numbers. Water efficiency and offsets would work as shown in Figure 6.2.

Figure 6.2: Achieving Water Neutrality (Waterwise 2021)



- 6.20 The first consideration therefore is to maximise the water efficiency of new development in order to reduce water consumption as far as possible. This is important as the greater the water efficiency (i.e. the less water used), the less offsetting is needed overall to reach water neutrality. Tighter water efficiency in new development can be achieved through a combination of, predominantly, water efficient fittings (for example low flow showers, tap aerators); flow regulators which reduce the flow of water into a property; and rainwater harvesting or greywater recycling.
- 6.21 The second consideration is to offset any remaining use, generally through retrofit measures elsewhere which reduce water consumption from existing development within the Water Resource Zone.
- 6.22 Part B of the Water Neutrality Study considered a range of possible water efficiency targets for residential development (all in litres per person per day, l/p/d):
- Building Regulations Standard: 125l/p/d;
 - Building Regulations Optional Standard: 110l/p/d;
 - Target 100: 100l/p/d;
 - Realistic Achievable: 85l/p/d; and
 - Ambitious: 62l/p/d.

- 6.23 Part C of the Water Neutrality Study took forward two of these targets to consider in more detail as part of the Strategy:
- 110 l/p/d ('Building Regulations optional'): The current standard in the Local Plans of the affected local authorities. This has been found sound at examinations, reflecting the fact that the Sussex North WRZ is already in an area of water stress.
 - 85 l/p/d ('Realistically achievable'): The Part C report considered the justification of this more ambitious target, including its achievability, costs and impacts in relation to water neutrality. Non-household development was considered alongside the residential element: it was recommended that it should achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for the BREEAM New Construction Standard, achieving a 40% reduction compared to baseline standards.
- 6.24 The standard Building Regulations requirement of 125 l/p/d was not considered reasonable, given that existing plan requirements are already more stringent. Having no water efficiency target, thereby relying on water neutrality studies for individual planning decisions, was also considered unreasonable for the same reason.
- 6.25 An alternative of 100 l/p/d average over the entire area (reflecting Southern Water's "Target 100" programme) was considered, however it was felt to not offer a significant improvement over 110 l/p/d. This target would require more stringent water efficiency measures to be installed in new development and would place a greater burden on any offsetting scheme.
- 6.26 Finally an option of 62 l/p/d was considered. This would be achievable where markets in water resources and water services result in widespread competition and local providers delivering integrated services. It would include extensive use of rainwater harvesting and greywater recycling as well as some smart devices. However, it was judged to be too stringent to be realistically deliverable.
- 6.27 The evidence set out in the Water Neutrality Study Part C indicates that a water efficiency policy target either of 85 l/p/d or 110 l/p/d would be reasonable to consider. It recommends that 85 l/p/d is adopted, because this is a figure supported as achievable by the Energy Savings Trust and Ofwat respectively (further details are found in Appendix C of the Part C Study). This more ambitious target would greatly reduce the need for offsetting measures to achieve water neutrality, and has been found to not unduly impact on viability (as shown in the Horsham Local Plan Viability Study, Aspinall Verdi, December 2022). Its application to all developments (and not, for example, only to the large sites) is judged necessary due to the need for full water neutrality across the whole District.

6.3 Water demand and the Water Resources Management Plan

6.28 Table 6.2 shows the additional water demand by the end of the Local Plan period under the two reasonable alternatives of 110 l/p/d and 85 l/p/d, assuming the development levels shown at Table 6.1.

Table 6.2: Total water demand under two water efficiency targets, (assuming development levels of Table 6.1)

Water efficiency target	Total water demand during Local Plan period (to 2038/39) (MI/d) ¹
Building Regs. optional (110 l/p/d)	5.916
Realistic achievable (85 l/p/d)	4.943

6.29 Water companies must produce a Water Resource Management Plan (WRMP) which defines how they will maintain a balance of water supply to water demand. Part of the current Southern Water WRMP (WRMP19) is a programme aimed at reducing water demand on the network through a reduction in household per capita consumption and a reduction in leakage. This will effectively offset most, but not all, of the growth proposed within the emerging Local Plans.

6.4 Demand for water and the scale of development

6.30 Figure 6.3 shows the predicted water demand from new development under 110 l/p/d and 85 l/p/d arising from combined local plan growth. The bars represent the contribution from Southern Water's water demand reduction and offsetting activities that are factored into their current WRMP19 (including a 10% safety margin), after sites with extant planning permission on or before September 2021 have been taken into account. Where there is a gap between the lines and the bars, additional offsetting is required in order to make the currently predicted local plan growth in that year water neutral, with the maximum gap being the total amount of offsetting required to make the plan water neutral overall.

¹ A megalitre (MI) is 1 million litres or 1,000 cubic metres. By way of comparison, an Olympic swimming pool contains 2.5MI of water

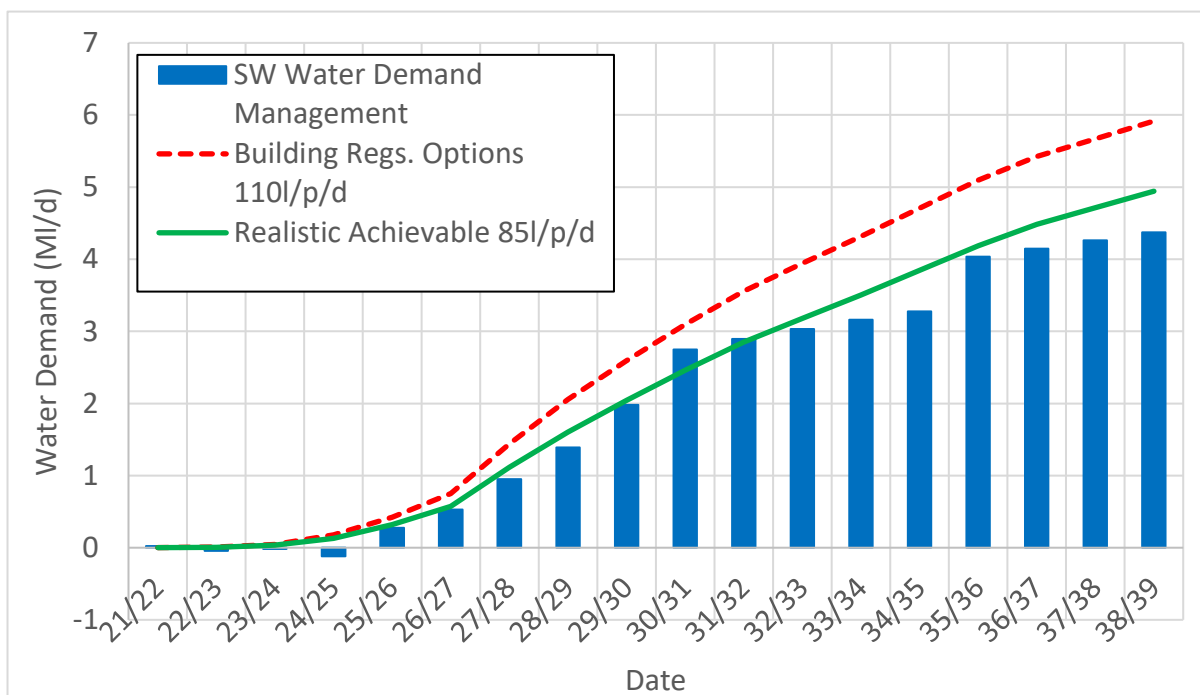


Figure 6.3: Water demand under alternatives of 110 l/p/d and 85 l/p/d arising from combined local plan growth

6.31 If the 110 l/p/d target were maintained, and employment growth is delivered, 6,345 new dwellings could be built in the Sussex North (WRZ) up to 2030 whilst achieving water neutrality, without a need for further offsetting beyond what is planned in WRMP19. This number would not increase abstraction at Pulborough (after Southern Water’s contribution to demand reduction and offsetting). This figure increases to 8,335 new dwellings if the more ambitious target of 85 l/p/d were adopted. A decay factor to reflect water use possibly increasing over time (for instance because residents decide to change the fittings in their house to less water-efficient fittings) has been included in the calculations. Tables 6.3 and 6.4 provide the year-by-year breakdown of how much housing growth can be theoretically delivered across the water resource zone, on the basis of what the WRMP19 can achieve (and without any additional offsetting that would need to be led by local authorities). When compared with what is included in emerging local plans, this still leaves a significant amount to offset. Thus if the growth identified in Local Plans is to be delivered in full, further offsetting beyond those measure identified by Southern Water is necessary.

Table 6.3 Water demand by year in 110 l/p/d scenario 2021 to 2039 (Sussex North Water Neutrality Study: Part C – Strategy, JBA Consulting (November 2022))

Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Water demand 110l/p/d (M/d)	0	0.01	0.04	0.17	0.33	0.59	1.22	1.74	2.23	2.69	3.15	3.54	3.89	4.27	4.65	4.98	5.26	5.54
SW Contribution (M/d)	0.18	0.38	0.65	0.73	1.21	1.52	1.97	2.41	3	3.77	3.91	4.05	4.18	4.3	5.06	5.17	5.28	5.39
SW Contribution (minus full extant planning) (M/d)	0	-0.1	-0.1	-0.21	0.14	0.39	0.78	1.22	1.82	2.58	2.73	2.87	2.99	3.11	3.87	3.98	4.1	4.21
Capacity for Local Plan growth (Dwellings)	0	0	0	0	530	937	1454	1659	2236	2901	578	543	513	477	2916	447	492	456
Capacity for Local Plan growth with employment growth delivered (Dwellings)	0	0	0	0	224	780	1256	1471	2052	2718	394	368	344	306	2743	281	328	293

Table 6.4 Water demand by year in 85 l/p/d scenario 2021 to 2039 (Sussex North Water Neutrality Study: Part C – Strategy, JBA Consulting (November 2022))

Year	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39
Water demand 85l/p/d (M/d)	0	0	0.03	0.13	0.25	0.45	0.94	1.35	1.75	2.13	2.52	2.84	3.15	3.47	3.81	4.1	4.36	4.61
SW Contribution (M/d)	0.18	0.38	0.65	0.73	1.21	1.52	1.97	2.41	3	3.77	3.91	4.05	4.18	4.3	5.06	5.17	5.28	5.39
SW Contribution (minus full extant planning) (M/d)	0	-0.1	-0.1	-0.21	0.14	0.39	0.78	1.22	1.82	2.58	2.73	2.87	2.99	3.11	3.87	3.98	4.1	4.21
Capacity for Local Plan growth (Dwellings)	0	0	0	0	695	1214	1907	2126	2838	3677	660	586	538	483	3639	418	479	427
Capacity for Local Plan growth with employment growth delivered (Dwellings)	0	0	0	0	442	1080	1719	1951	2668	3510	491	429	387	329	3483	271	335	286

6.5 Offsetting water demand

- 6.32 Offsetting must be in place before the water demand is generated, for instance before new houses are occupied. If it is not possible to provide sufficient offsetting, because it cannot be delivered fast enough, or there is not enough available offsetting to meet demand, this will restrict the amount of growth that can go ahead.
- 6.33 As explained above, a deficit exists between the WRMP19 offsetting package and the total demand for new water supply from new local plan growth. A key feature of the Part C brief was to advise on a mitigation package to address this gap, to sit within the remit of local plans, which is deliverable, achievable and effective. A number of potential offsetting measures were assessed while defining this Strategy. This led to a proposed local authority-led ‘offsetting scheme’, which would further offset new water supply over and above the offsetting included as part of the WRMP. The recommendations for an offsetting scheme in Part C of the Water Neutrality Study are:

- Flow regulators in existing properties – installing a device to reduce the volume of water used in existing properties. This device has been used in a trial by Crawley Homes in 2022, and in trials by Affinity Water elsewhere in the country.
- Water efficiency in schools – consisting of water audits, retrofitting water efficient devices, and where practical installing rainwater harvesting. Schools in West Sussex are already under the national average in water consumption and options for reducing this further are limited.
- Non-household rainwater harvesting (RwH) – commercial buildings offer a large potential for RwH due to their extensive roof areas. In a non-household setting, RwH can be used to meet the demand from toilet flushing, as well as other uses such as vehicle washing.
- Golf course irrigation – The British and International Golf Greenkeepers Association carried out a survey in 2019 and reported that just under 50% of golf facilities rely on mains potable water supply for irrigation. Assuming these figures are reflective of the golf courses within Sussex North, there is large potential for saving water if an alternative source of water for irrigation could be found. Other recreational uses such as sports grounds, swimming pools and leisure centres should also be investigated.

6.34 The offsetting scheme forms part of the implementation of local plans but does not itself form planning policy. It is not therefore necessary to appraise alternative approaches.

6.6 Appraising the Reasonable Alternatives

6.35 Table 6.5 below shows the reasonable water efficiency alternatives for consideration. The Water Neutrality Study Part C provides detailed technical and other evidence which explains why these two options have been investigated, and others ruled out as not being reasonable alternatives.

Table 6.5: Reasonable alternatives for water neutrality

Water efficiency level	Summary reason for consideration
110 l/p/d	This is the ‘optional’ Building Regulations Approved Document Part G standard. It is the standard required in currently adopted local plans within the Sussex North Water Resource Zone. It is less expensive to implement but would require significantly greater levels of water supply offsetting required over local plan periods compared with the alternative (85 l/p/d) and may therefore result in significantly less housing being delivered.
85 l/p/d	This more ambitious standard is recommended for local plan adoption in the Water Neutrality Study Part C. It is supported by research into feasibility, costs and local market research. It is more expensive to implement but considered realistically achievable. It would require significantly lower levels of water supply offsetting required over local plan periods compared with the alternative (110 l/p/d) and may therefore result in significantly more housing being delivered.

6.36 Table 6.6 shows the sustainability appraisal of the two reasonable alternatives for water neutrality, which relate to water efficiency. Each Local Authority within the Water Resource Zone has also appraised these two options using their SA Framework and the results are consistent.

Table 6.6: Sustainability appraisal of reasonable alternatives for water efficiency targets

	To Set Water Efficiency Target of 110l/p/d in line with Building Regs. Optional Standard for residential developments or BREEAM ‘Excellent’ within water category for non-residential developments and Require Remainder of Water to be Offset	To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments and Require Remainder of Water to be Offset
SA1: Housing	<p>This would rely on greater offsetting levels being achieved or limiting development levels.</p> <p>Offsetting opportunities are restricted to those within the Sussex North Water Resource Zone, subject to water neutrality.</p> <p>In order to secure the certainty needed for the Local Plans to progress the Strategy can only rely on those schemes which can be within the control of the local authorities. It is likely this would either take significantly longer to set up an appropriate Implementation Scheme or development levels within the Local Plans would need to be reduced to</p>	<p>---</p> <p>The Water Neutrality Strategy sets out the levels of development achievable with the Southern Water measures. Part C confirms there is sufficient capacity within the local authority owned and Registered Social Landlord (RSL) housing stock to meet the additional offsetting levels associated with the Local Plan development levels. The local authorities’ Implementation Scheme will set out the offsetting programme to meet these needed.</p> <p>This level of water efficiency would allow for 8,335 new dwellings to be delivered to 2029/30. This figure is below the areas objectively assessed housing need; however it allows more development than the previous option.</p> <p>-</p>

	To Set Water Efficiency Target of 110l/p/d in line with Building Regs. Optional Standard for residential developments or BREEAM 'Excellent' within water category for non-residential developments and Require Remainder of Water to be Offset		To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments and Require Remainder of Water to be Offset	
	<p>meet the current known offsetting opportunities.</p> <p>This level of water efficiency would allow for 6,345 new dwellings to be delivered to 30 which is somewhat below the areas objectively assessed housing need. As such a significant adverse effect has been recorded for this indicator</p>		<p>As such a minor adverse effect has been recorded for this indicator.</p>	
SA2: Access to services & facilities		0		0
SA3: Inclusive communities		0		0
SA4: Crime		0		0
SA5: Health and wellbeing	<p>Limiting the amount of water use to 110 litres per person per day will result in less water being abstracted from the environment, thereby reducing associated negative impacts on the wildlife sites in the Arun Valley. Many of these sites are used for leisure and recreation, which improves health and wellbeing. As such a minor positive effect is recorded – albeit it is less positive than the 85l/p/d target.</p>	+	<p>Limiting the amount of water use to 85 litres per person per day will result in less water being abstracted from the environment, thereby reducing associated negative impacts on the wildlife sites in the Arun Valley. Many of these sites are used for leisure and recreation, which improves health and wellbeing. As such a minor positive effect is recorded.</p>	+
SA6: Biodiversity and geodiversity	<p>The legal requirements to achieve water neutrality would still require water neutrality through development Management policies even without a plan in place. However, the other policies within the plan will require a positive net gain for biodiversity which wouldn't be achieved without a sound and legally compliant approach to water neutrality. As such a minor positive impact has been recorded</p>	+	<p>The legal requirements to achieve water neutrality Development Management would still require water neutrality even without a plan in place. However the other policies within the plan will require a positive net gain for biodiversity. As such a minor positive impact has been recorded</p>	+
SA7: Landscape		0		0
SA8: Historic environment		0		0

	To Set Water Efficiency Target of 110l/p/d in line with Building Regs. Optional Standard for residential developments or BREEAM 'Excellent' within water category for non-residential developments and Require Remainder of Water to be Offset		To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments and Require Remainder of Water to be Offset	
SA9: Efficient land use	It is not known whether this approach would favour greenfield schemes, particularly due to the challenging nature of re-using brownfield land and higher associated viability costs (including higher land values).	?/0	The Water Neutrality Study has considered costs which suggest the most viable approach to achieve water neutrality is to minimise water consumption at the point of construction and confirms that 85l/p/d is achievable for previously developed land.	+
SA10: Natural resources	100l/p/d is considered to be achievable and would go beyond the existing Local Plan's Water Stress position, reflecting the unique nature of the water supply constraints on the Sussex North Water Resource Zone. The impact is positive but not as positive as it would be with a higher water efficiency target.	++	85l/p/d is considered to be achievable and would go beyond the existing Local Plan's Water Stress position, reflecting the unique nature of the water supply constraints on the Sussex North Water Resource Zone.	++
SA11: Water resources	Nutrient load reduced as less water taken from the system. The impact is positive but not as positive as it would be with a higher water efficiency target	+	Nutrient significantly reduced as less water taken from the system	++
SA12: Flooding		0		0
SA13: Transport		0		0
SA14: Air quality		0		0
SA15: Climate change	Minimising water consumption and maximising water efficiency in new developments, as well as offsetting elsewhere, reduces associated energy consumption (in relation to supply and usage). The impact is positive but not as positive as it would be with a higher water efficiency target	+	Minimising water consumption and maximising water efficiency in new developments, as well as offsetting elsewhere, reduces associated energy consumption (in relation to supply and usage).	++
SA16: Economic growth	This would rely on greater offsetting levels being achieved or limiting development levels. Offsetting opportunities are restricted to those within the Sussex North	--	This would rely on greater offsetting levels being achieved or limiting development levels. Offsetting opportunities are restricted to those within the Sussex North Water	-

	To Set Water Efficiency Target of 110l/p/d in line with Building Regs. Optional Standard for residential developments or BREEAM 'Excellent' within water category for non-residential developments and Require Remainder of Water to be Offset		To Set Water Efficiency Target of 85l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments and Require Remainder of Water to be Offset	
	Water Resource Zone, subject to water neutrality. In order to secure the certainty needed for the Local Plans to progress the Strategy can only rely on those schemes which can be within the control of the local authorities. It is likely this would either take significantly longer to set up an appropriate Implementation Scheme or development levels within the Local Plans would need to be reduced to meet the current known offsetting opportunities.		Resource Zone, subject to water neutrality. In order to secure the certainty needed for the Local Plans to progress the Strategy can only rely on those schemes which can be within the control of the local authorities. It is likely this would either take significantly longer to set up an appropriate Implementation Scheme or development levels within the Local Plans would need to be reduced to meet the current known offsetting opportunities.	
SA17: Employment		0		0

6.37 The preferred alternative, jointly agreed by all the authorities in the Sussex North WRZ, is a water efficiency level of 85 l/p/d for residential developments or achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments. Both options, coupled with the development of a local authority-led offsetting scheme, would help to achieve water neutrality, and help to protect the area's biodiversity and sites of international nature conservation importance. However, the preferred alternative is the more socially beneficial alternative, as it allows a greater number of homes to be built. It is economically viable for developers and future house buyers and would require less expensive offsetting. It would have no significant negative impacts on the sustainability objectives. It is also supported by the HRA, which notes that the water efficiency measures outlined in the policy would make it more feasible for Southern Water to reduce reliance on the Hardham groundwater abstraction during periods of high demand and/or low flow and thus protect the SAC and Ramsar sites.

6.38 The Statement of Common Ground (<https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>) confirms that these appraisal findings apply jointly to all the local authorities in the Sussex North WRZ, and all of the authorities agree that the preferred alternative is 85 l/p/d or achieve a score of 3 credits within

the water (WAT01 Water Consumption) issue category for the BREEAM Standard for non-residential developments.

- 6.39 The appraisal shows that there is a need for the process to be managed in order to ensure the certainty of achieving water neutrality is achieved. This will require the preparation of the Implementation Scheme alongside ongoing monitoring.

6.7 Reasonable Growth Alternatives and Water Neutrality

- 6.40 The requirement for the emerging Local Plan to be water neutral has greatly narrowed the scope for growth at the current time. The impact on the options and outcome of the assessment is set out in more detail in Chapters 6 and 7 of this report.

- 6.41 The jointly prepared Water Neutrality Strategy (Water Neutrality Study Part C - JBA, December 2022 – see <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>) has been prepared in partnership with Crawley Borough Council, Chichester District Council and the South Downs National Park Authority. As reported earlier in this section, it identifies that the level of water available from offsetting schemes to help deliver new growth in the plan period to 2040 is currently limited, particularly in the early stages of the plan period. At the time of this assessment, no developer-led water neutrality schemes have been identified of sufficient certainty or scale to accord with the Habitat Regulations 2017 as applies to local plans. Growth is therefore restricted to what Southern Water’s Water Resources Management Plan (WRMP) and the local authorities’ offsetting scheme can in combination support.

- 6.42 Based on an average water usage (‘per customer unit’) of 85 l/p/d, the Part C Report, figures for housing growth (as also shown in Table 6.4 above) can be compared with the emerging overall quantum of growth in the WRZ. This is shown in Table 6.7. The figures reflect what the WRMP19 can achieve without any additional local authority-led offsetting. The ‘growth currently planned’ figures incorporate a housing supply figure for Horsham District was an indicative snapshot, which was based on an early indicative housing trajectory calculated at the time the Water Neutrality Strategy (Part C) was being prepared. This averaged out at 800 dwellings per annum over the period shown, reflecting a carry-forward of the housing target in the adopted Horsham Local Development Framework (i.e. lower than any option tested in the draft Regulation 19 LUC SA Report).

Table 6.7 – Total capacity versus total planned growth from emerging and adopted local plans in the Sussex North WRZ, assuming a CPU of 85 l/p/d

Time period	2022/23 to 2026/27	2027/28 to 2031/32	2032/33 to 2038/39	TOTAL 2021 to 2039
Capacity for Local Plan growth with employment growth delivered (dwellings), based on Southern Water WRMP	2,090	10,081	5,015	17,186
Growth currently planned for in emerging Local Plans*	2,309	9,558	7,806	19,673

Source: Water Neutrality Part C / HDC / Crawley Borough Council / Chichester District Council / South Downs National Park Authority

*Projected housing supply figures from emerging local plans were correct as of November 2022 however these have been updated as work on local plans has moved on

- 6.43 Table 6.7 shows there was a shortfall in ‘capacity’ of at 219 homes in the early local plan periods (2022/23 to 2026/27). Overall, there is a difference between capacity and planned-for supply of 2,487 homes between 2021 and 2039. It should, however, be noted that the Horsham housing trajectory has been updated ahead of Regulation 19 publication, and, due to further legal complications surrounding water neutrality for planning applications, there will be still less housing supply in Horsham going forward than previously estimated (an annualise average of 777 per year). The WRZ shortfall will be met through the local authority-led offsetting scheme as described in the Part C Study and outlined above, however the timing of its implementation is yet to be confirmed.
- 6.44 HDC has produced an updated housing trajectory which will be available on the Regulation 19 publication date at <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>. This shows that, due to the very low number of homes being granted planning permission in 2022 and 2023, housing supply until 2027/28 will be heavily reliant on extant planning permissions being built out (and therefore well below the Government’s Standard Housing Method figure).
- 6.45 Both the water neutrality constraint, and the finite capacity of the market and infrastructure to sufficiently accelerate growth, are shown to limit supply in the mid-to late-years of the Plan period. In particular, the large site allocations, which have a longer lead-in time, are expected to deliver less development within the Plan period than was previously thought. Whilst supply in the later period is greater than during the early period, it cannot fully make up for the supply pipeline ‘lost’ to water neutrality in 2022 and 2023.

- 6.46 The Council's evidence also includes the Housing Market Delivery Update (Iceni Projects, Nov 2023). This estimated that there is market capacity to support an annualised average of some 867 dwellings per annum but with much higher numbers possible in the mid-late stages of the Plan period. This figure is however a more theoretical figure based primarily on housing market forecasts, with less analysis of other factors.
- 6.47 The updated trajectory arrived at by the Council provides evidence that realistically, the amount of housing development that can be supported over the 17-year Plan period is 13,212 homes. This equates to an average delivery rate of 777 homes per year. The NPPF requires actual year-on-year delivery to include a 10% uplift or 'buffer' to be applied to the headline housing target, which this target reflects in the first 5-year period. The recommended target of 777 homes a year (averaged over the Plan period) is similar to the growth in Horsham District that was assumed in the WRMP. As the trajectory shows a lower rate of delivery until 2027/28, the target is 'stepped' to reflect this, such that the targets are 480 and 901 dwellings per annum for years 1-5 and years 6-17 respectively. This stepped approach also shows regard to the emerging Crawley Local Plan (which seeks to front-load housing delivery in their area). It has also considered Chichester District's emerging Plan, and growth levels have been subject to discussion with both Crawley and Chichester under the Duty to Cooperate. Sustainability appraisal of this revised target is presented in Chapter 7 of this report.
- 6.48 In SA terms, the weight of evidence supporting a constrained quantum has limited what could be considered reasonable alternatives for growth. Draft Regulation 19 LUC SA Report (Chapter 4) assessed a lower growth option of 1,000 dwellings per annum, which gave a parameter for spatially specific growth scenarios, the appraisals of which are presented in Chapter 7 of the LUC report. Whilst the proposed revised Plan target is lower, this does not change the spatial growth scenarios available, given that large sites will supply housing beyond the Plan period to a greater degree than previously thought. The lower growth options are shown in the box below:

Scenario 1a: settlement hierarchy - urban extension

Allocate following strategic sites: West of Ifield, East Billingshurst, Southwater, North Horsham, Kilnwood Vale, Rookwood, Ashington Cluster plus 550 homes on smaller sites

Scenario 1b: new settlement option

Allocate following strategic sites: North East of Henfield, Adversane, Buck Barn plus 2,050 homes on smaller sites

Scenario 1c: relating to access to sustainable transport

Allocate following strategic sites: West of Ifield, East Billingshurst, Southwater, North Horsham plus 2,500 homes on smaller sites

Scenario 1d: new settlements and small sites only

Allocate following strategic sites: North East of Henfield, Adversane, Buck Barn plus 3,700 homes on smaller sites

6.49 The summary matrix for the lower growth options appraisal by LUC is presented in Table 6.7.

Table 6.7: Summary of likely sustainability effects of the growth scenario options considered for the Horsham District Local Plan

Growth Scenarios	Lower Growth Scenarios			
	Scenario 1a	Scenario 1b	Scenario 1c	Scenario 1d
SA objectives				
1: Housing	+/-	+/-?	+	++/-
2: Access to services and facilities	+/-	--/+	--/+?	--/+
3: Inclusive communities	++/-	--/+	+/-	--/+
4: Crime	0	0	0	0
5: Health	++/-	++/--	--/+?	--/+
6: Biodiversity and geodiversity	--?	--?	--?	--?
7: Landscapes and townscape	--?	-?	--?	--?
8: Historic environment	--?	-?	--?	--?
9: Efficient land use	+/-	-	+/--	--
10: Natural resources	-?	--?	--?	--?
11: Water resources	-?	-?	--?	-?
12: Flooding	-?	--?	--?	--?
13: Transport	++/-?	--/+	++/-	--
14: Air Quality	++/-	--/+	++/-	--
15: Climate change	++/-	--/+	++/-	--/+
16: Economic growth	+/-	--/+	++/-	--/+
17: Access to employment	++/-	+/-	++/-	--/+

6.50 The broad conclusions from the draft Regulation 19 LUC SA Report remain valid. The better performing scenarios against SA objectives were Scenario 1a (Settlement hierarchy – urban extensions) and Scenario 1c (relating to access to public transport).

These were not dissimilar insofar as they concentrated strategic development around existing settlements, and close to public transport hubs and employment areas.

- 6.51 The Preferred Strategy set out in the July 2021 Cabinet version of the Local Plan was selected as a balanced strategy which built in the existing settlement hierarchy, whilst also planning for a new settlement. It was considered to achieve an appropriate balance between maximising newly acquired benefits arising from developing strategic housing sites e.g. new schools, community facilities, open spaces etc. and maximising sustainability benefits of some growth around existing smaller settlements which would in turn deliver new community infrastructure and boost the viability of village services. It would also not force disproportionate and rapid levels of development on existing communities.
- 6.52 Because the issue of water neutrality has stymied housing delivery during the early plan period and will continue to be limited to some degree by the availability of water offsetting credits, it also means that a lower amount of development can come forward by way of site allocations. Because of this the conclusions of the Sustainability Appraisal 2021 needed to be reconsidered. The draft Regulation 19 LUC SA Document of July 2021 indicated that urban extensions (together with some more limited growth of smaller villages and towns), were more sustainable than the provision of new settlements. As such a strategy which does not include any new settlement proposal has been pursued into the current Regulation 19 Local Plan. This has led to the removal of the proposed allocation at Buck Barn (as well as Kilnwood Vale, for reasons relating to deliverability). The reasons for the decisions to remove these are explained in the next chapter.

7.0 Sustainability Appraisal of the Local Plan (December 2023) including the new Water Neutrality Policy

- 7.1 Given the finite amount of water available for development during the plan period, fewer homes can be delivered in the plan period when compared with the July 2021 Cabinet version of the Local Plan. There has also been an intervening period of around 2 years where the development considerations on some of the smaller sites have changed. Because of this, and in order to take into account the new water neutrality requirements, the changes made to the plan since the draft Regulation 19 LUC SA Report have had to be re-appraised. This Chapter assesses the changes made to the large sites, small sites and the non-site policies. Chapter 8 shows the impacts of the entire plan.
- 7.2 Although water neutrality was not considered by LUC in their original appraisal of the large and small sites, it has been considered for this updated SA/SEA Report. The LUC appraisal assessed all development sites as having a neutral impact on water resources. That assessment has not been changed for this SA, since water neutrality applies to all sites equally, and it is required by HRA legislation that all development is mitigated by means of water efficiency and offsetting (or other site-specific means) to be water neutral.

7.1 Appraisal of Changes to Strategic Sites

- 7.3 Table 7.1 identifies the changes made to the strategic (large) sites that have been put forward for Local Plan consideration and assesses whether the change is considered significant in terms of the sustainability objectives. If the change is deemed to be significant, then a re-appraisal of the large site has been undertaken (see Table 7.2) and the conclusions are also presented in the final column of the table. Where a change to the appraisal outputs or 'scores' has occurred, the SA Objective effected is shown in bold text.
- 7.4 The appraisal matrix for the updated strategic site assessments can be found in Table 7.2. Only sites that have been assessed as having a 'significant impact in sustainability terms' have been included. The appraisal of all large sites including those which have not been subject to change is found in Chapter 8 of this report.
- 7.5 Note that all strategic sites that have been promoted to the Council are included in the SA, including those that have not been selected for allocation as noted in Table 7.1.

Table 7.1 Changes to Large sites

Large site Name	Proposed Local Plan Policy updates since July 2021	Summary of the Updated Sustainability Appraisal changes
SA101: West of Ifield	<p>Since 2021 the site promoters have confirmed that the overall amount of housing available on this site has changed to approximately 3,000 (previously 3,250). The Council is of the view that at least 1,600 homes can be completed within the plan period. The policy has been updated to reflect this.</p> <p>In light of other changes to the evidence base (including reflecting the proximity of Crawley town to this site), the policy now proposes at least 40% of all housing delivered (previously 35%).</p>	<p>No significant change. The proposal is still for a large-scale development and still scores as a strong positive effect against the criterion of housing delivery: there are no changes to the Council’s overall conclusions. The West of Ifield remains a sustainable location for development, given the ability for this site to deliver a high quantum of housing development, including housing development close to a key employment centre. This site would make a sizable contribution to the District’s identified housing need, including the provision of affordable housing and could potentially contribute to the unmet housing need within that District as part of the wider North West Sussex Housing Market Area (HMA).</p> <p>The site still scores positively for SA2: Access to services and facilities as it will still help to meet needs generated by Crawley including a new secondary school.</p> <p>Mitigation measures will be required to address the environmental impacts of development in this location including landscape impacts.</p>
SA118: Land East of Billingshurst	<p>There have been no fundamental changes to the proposals or policy requirements since 2021.</p>	<p>No significant change to the Council’s sustainability appraisal conclusions although it is considered that the wording of the policy and supporting text has been improved to help ensure the delivery of community facilities.</p>
SA119: North-west of Southwater	<p>Since 2021, the site promoters applied for outline planning permission for a greater quantum of development in this location than was initially</p>	<p>The Council has considered the impacts of a decrease in housing below 1,200 in this location. Whilst this would still assist with the long-term provision of housing needs – the level of development likely to come</p>

	<p>appraised (1,500 homes). As part of this proposal the location of the secondary school and extent of development within the red line was changed.</p> <p>The planning application was subsequently withdrawn, and the promoters have revised their plans such that only 1,000 homes will now be built. The proposal for a secondary school within the site remains. The Council is of the view that at least 735 homes can be completed within the plan period. The policy has been updated to reflect this. It retains the school in the location identified in the neighbourhood plan.</p>	<p>forward in the plan period has not significantly changed since 2021. Therefore, the benefit against the housing objectives would not change significantly.</p> <p>A development of 1,000 homes as opposed to 1,200 would have a lower adverse impact on the landscape. The provision of the school would be in a location identified by the existing community as part of their neighbourhood plan. This would continue to support community cohesion between the new and existing communities.</p>
SA291 West of Kilnwood Vale	<p>No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.</p> <p>There is existing outline planning permission for 2,750 homes which will not be built out until 2035. It has been agreed with the site promoter, without prejudice to future local plan reviews, that it would be premature to allocate further land in this Local Plan due to uncertainties of delivery timescales following on from the existing permitted development. A further reason for its removal is that the impact of water neutrality on delivery has reduced the overall amount of development that could be delivered in the District over the Plan period.</p>	<p>No significant change to the Council's sustainability appraisal conclusions.</p>
SA394: Rookwood	<p>Not applicable – The site owner has confirmed that the site is not available for development and no</p>	<p>Not Applicable</p>

	<p>scheme is being progressed. It was therefore not recommended for allocation in 2021 and this remains the case.</p>	
<p>SA459/SA674/SA846: Land East of Kingsfold</p>	<p>Since 2021, the site promoter has indicated that they would bring forward a larger scale development of around 2,150 homes as a single new settlement – compared with around 1000 homes originally as a set of interlinked smaller settlements. The promoter has indicated there is the potential for a new railway station to be provided as part of the development alongside enhancements to the stretch of the A24 which runs through the existing settlement of Kingsfold. An extension to the existing employment offer to the south east of the site is proposed, along with community facilities and sustainable transport options. The site was not previously recommended as an allocation and remains not included.</p>	<p>No significant change to the Council’s sustainability appraisal conclusions. Whilst a larger scale development in this location is likely to perform better against the sustainability criteria of housing delivery, the impact against SA Objective 1: Housing was already a significant positive and so the scoring for this objective has not changed.</p> <p>Similarly, although a new railway station is proposed, its delivery is not certain, and the location of the development would continue to lead to a high level of reliance on private car use to access Horsham to the south. As such the impacts on SA Objectives 2 and 13 are still considered to be mixed significant negative and positive impact and mixed minor negative and positive respectively. The scale of the development would continue to have an adverse impact on the landscape (SA7).</p>
<p>SA744 (includes SA225)/SA668: West of Billingshurst</p>	<p>The site was previously not included as an allocation and remains not included.</p>	<p>No significant change to the Council’s sustainability appraisal conclusions. Whilst the site promoter’s leisure use proposals have further evolved, there is no change to the overall quantum of development, nor the uses proposed. LUC had previously appraised the site overall favourably against SA2: Access to services and facilities and against SA5: Health and wellbeing and overall, unfavourably on a number of environmental objectives. This remains the case.</p>
<p>SA754: Horsham Golf & Fitness Club</p>	<p>Since 2021, the site promoter has submitted an outline planning application - the proposals would bring forward an increased level of development (around 800 homes) compared with earlier schemes presented.</p>	<p>Significant changes have occurred. Although a larger scale development in this location will perform better against the sustainability criteria of housing delivery, other impacts from the 2021 sustainability appraisal have had a greater negative impact.</p>

		In particular, the site is not of a scale or in a location where it would provide significant new community facilities to meet day to day needs (e.g. education / retail) rather than the proposed sporting facilities, this would increase the number of people travelling to other services and facilities – increasing adverse impacts against sustainability criterion SA13 Transport, SA14 Air Quality and SA17: Access to Employment
SA085/SA520/SA524 /SA539/SA790: Ashington cluster	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the Council’s sustainability appraisal conclusions. It was not recommended for allocation in 2021 and this remains the case.
SA414: Land North East of Henfield (Mayfield)	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development. The current promoter has formally withdrawn the site from consideration for the current Local Plan Review.	Not Applicable
SA597: Adversane	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the Council’s sustainability appraisal conclusions. It was not recommended for allocation in 2021 and this remains the case.
SA716: Buck Barn	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the Council’s sustainability appraisal conclusions. However, although this site was previously included as an allocation in the July 2021 version of the Regulation 19 Local Plan, this site was the least well performing of the potential strategic sites when assessed against SA objectives, and the least favourable when considered against the Local Plan objectives. Given the impact of water neutrality on the plan this site was therefore recommended be removed as an allocation.

Table 7.2 Updated Appraisal of the Large Strategic Sites that have seen a significant change

SA Objective/ Site Name	1: Housing	2: Access to services and	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment
SA119: North-west of Southwater	++?	+?	+?	0?	++/-?	--?	-	--?	--?	--?	0	-?	+/-?	++/-?	+/-?	++	+/-?
SA754: Horsham Golf & Fitness Club	++	-?	0	0	-/+?	-?	--?	--?	-	--?	0	-?	+/-?	+/-?	+/-?	+	+/-?

7.2 Appraisal of Changes to Small Sites

7.6 Table 7.3 lists the small sites that have been subject to change si compared with the July 2021 Cabinet version of the Local Plan. These sites were appraised as part of the SA process undertaken by LUC in 2021, however because further information has been submitted since that time, and the policy wording has been updated, the initial appraisals have been revisited. Table 7.3 explains the changes made to each site and assesses whether the change is considered significant in terms of sustainability. If the impact was deemed to be significant, a re-appraisal of the small site was undertaken and has been presented in Table 7.4. Changes to the final SA Objective appraisal outputs are recorded in **bold text**. The full appraisal of **all** small sites, including those that have not been subject to change is presented in Chapter 8 of this document.

Table 7.3 Changes to Small Sites

Small site Name	Changes Made	Significant change in sustainability appraisal terms (Y/N) and summary of the updated Sustainability Appraisal
SA522 Old School Site (Strategic Policy HA6)	An additional site was added to Barns Green section called the Old School site for 20 units. It's a NP allocation away from the main settlement in the parish. The Old School site is a brownfield site and bring a further 20 units to Itchingfield Parish (totalling 120 units in the plan period)	<p><u>Yes, significant changes have occurred.</u> The new site has been appraised in Table 7.4:</p> <p>The site adds to the District's housing stock and is expected to provide some affordable housing, it therefore scores well against the SA Objective 1 housing delivery.</p> <p>The site is expected to have a mixed minor effect in relation to SA objectives 2, 13 & 15, due the fact that it is located away from the main settlement in the parish and will require reliance on public transport.</p> <p>A minor positive effect is expected for SA Objective 3 as it is located on brownfield land.</p> <p>An uncertain negligible effect is expected in relation to SA objective 4: crime. Because the potential for new development to minimise incidences of crime and the fear of crime will depend mostly on design considerations.</p> <p>The site is expected to have positive effects in relation to SA objective 5: health, due to their proximity to healthcare facilities and areas such as open spaces or sports facilities which may help to encourage more active lifestyle choices.</p> <p>The site is expected to have a negligible impact on SA Objective 6 7 & 8 as it is not located within or near any biodiversity or geodiversity sites, areas of ancient woodland, Local Landscape areas or heritage assets.</p> <p>The site is on brownfield land, therefore a minor positive effect has been recorded for SA Objective 9. It also lies within a Brick Clay Safeguarding area so a minor negative impact has been recorded for SA Objective 10.</p>

		<p>The site is located in the Water Resource Zone and as such is expected to have a minor negative impact on SA Objective 11 without appropriate mitigation.</p> <p>The site comprises predominantly of brownfield land. Development is unlikely to result in a significant increase in impermeable surfaces so negligible effect is expected in relation to SA objective 12.</p> <p>Negligible effects are expected in terms of SA Objectives 16 and 17 as the site is only expected to deliver residential development.</p>
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SA510 Land at Muntham Drive (Strategic Policy HA6)	Additional criterion added to bullet BGR2: to provide greater protection for heritage assets. (b) Ensure that appropriate regard is had to the impact on the adjacent Grade II Listed Building (the Queens Head Public House, Blacksmiths Cottage and Bennetts)	<u>Yes, significant changes have occurred.</u> Additional criterion added to protect the Grade II Listed building meaning SA Objective 8: Heritage has been appraised more favourably.
SA074 Land at Hornbrook Farm (Strategic Policy HA10)	Additional criterion added to the policy HOR1: to improve connectivity and improve road safety for cyclists and pedestrians. Provide safe pedestrian and cycling crossing points over the A281 (Brighton Road) from this site.	No significant change to the Council's sustainability appraisal conclusions: Although an additional criterion has been added to improve connectivity road safety for cyclists and pedestrians, meaning there will be a more favourable impact on the Transport indicator, the likely impact on SA13 Transport was already to be a significant positive and as such there have been no changes to the SA appraisal outputs.
SA568 Land at Mercer Road (Strategic Policy HA10)	Added references to Active Travel links to HOR2 and also made the 50 spaces parking requirement at Warnham Railway Station a minimum requirement rather than optional	No significant change to the Council's sustainability appraisal conclusions: while the increase in parking provision at Warnham station will encourage a modal shift towards rail travel, meaning there will be a more favourable impact on the Transport indicator, the likely impact on SA13 Transport was already to be a significant positive and as such there have been no changes to the SA appraisal outputs.
SA892 Land at Cyder Farm (Strategic Policy HA11)	Additional site added to Lower Beeding section called the Land at Cyder Farm for 6 units.	<u>Yes, significant changes have occurred.</u> The site adds to the District's housing stock and is expected to provide some affordable housing, it therefore scores well against the SA Objective 1 housing delivery. The site is expected to have a neutral effect in relation to SA objectives 2, 13 & 15 , due the fact that it is located away from the main settlement in the parish and will require reliance on public transport.

		<p>A minor positive effect is expected for SA Objective 3 as it is located on brownfield land.</p> <p>An uncertain negligible effect is expected in relation to SA objective 4: crime. Because the potential for new development to minimise incidences of crime and the fear of crime will depend mostly on design considerations.</p> <p>The site is expected to have a minor positive effect in relation to SA objective 5: health, due to its proximity to areas of open countryside which may help to encourage more active lifestyle choices.</p> <p>The site is expected to have a negligible impact on SA Objective 6 7 & 8 as it is not located within or near any biodiversity or geodiversity sites, areas of ancient woodland, Local Landscape areas or heritage assets.</p> <p>The site is on brownfield land, therefore a minor positive effect has been recorded for SA Objective 9. It also lies within a MSA so a minor negative impact has been recorded for SA Objective 10.</p> <p>The site is located in the Water Resource Zone and as such is expected to have a minor negative impact on SA Objective 11 without appropriate mitigation.</p> <p>The site contains a substantial area of brownfield land. Meaning development is unlikely to result in a significant increase in impermeable surfaces so negligible effect is expected in relation to SA objective 12.</p> <p>Negligible effects are expected in terms of SA Objectives 16 and 17 as the site is only expected to deliver residential development.</p>
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SA274 Land north of the Rise, Partridge Green (Strategic Policy HA12)	The site has been added as an allocation following the removal of the site at Buck Barn	No significant change to the Council's original sustainability appraisal conclusions.
SA386 Land South of Lower Broadbridge Farm (Strategic Policy HA7)	Housing allocation reduced from 150 units to 133 Reference to Flood Zones 2 and 3 added to policy wording	<p>No significant change to the Council's sustainability appraisal conclusions.</p> <p>Whilst the scale of development proposed has been reduced from 150 dwellings to 133 dwellings, the site still has capacity for more than 10 dwellings, meaning it will make a contribution towards the Districts housing need and so a significant positive impact remains for SA1 Housing.</p> <p>The reduction in the number of units on site and the fact that a reference to Flood Zones 2 and 3 has been added to the policy could have a positive impact on flooding, however because any development in this location is still expected to have minor negative effects in relation to SA objective 12: flooding the appraisal criteria from the 2021 appraisal have not changed significantly.</p>
SA433 Land at Dunstans Farm, Partridge Green. (Strategic Policy HA12)	The site has been added as an allocation following the removal of the site at Buck Barn. There are aspirations to improve connectivity between this site and the adjacent site SA274 at Dunstans Farm. Additional criterion added to reflect this requirement has been added to the policy.	No significant change to the Council's sustainability appraisal conclusions.
SA320 Land west of Church Road (aka Land north of the Rosary), Partridge	The site has been reinstated as an allocation following the removal of the site at Buck Barn.	No significant change to the Council's original sustainability appraisal conclusions.

Green (Strategic Policy HA12)		
SA112 Greendene, Pulborough	A planning application is under consideration on the site which would have led the Local plan allocation for to increase by 10 units to 70 units (was originally 60 dwellings). However the allocation has now been removed from the final Regulation 19 Local Plan.	No significant change to the Council's sustainability appraisal conclusions. However, although this site was previously included as an allocation, it has since been removed due to questions around the sites suitability.
SA794 Land north of Guildford Road, Rusper (Strategic Policy HA14)	Additional criterion added in the policy to read as follows: Ensure that appropriate regard is had to the impact on nearby Grade II listed buildings (Fox Inn, Old Cottage and Field Cottage).	<u>Yes, significant changes have occurred.</u> Increased protection for a listed building located adjacent to the site has resulted in a more favourable score against SA Objective 8: Historic environment .
SA742 Glebe Farm, Steyning (Strategic Policy HA17)	Increase in the quantum of development from 240 to 265 dwellings making best use of land	No significant change to the Council's sustainability appraisal conclusions. A larger scale development in this location will perform slightly better against the sustainability criteria SA1: Housing delivery, however as this impact was already scored as a strong positive, the sustainability appraisal criteria from the 2021 appraisal have not changed significantly.

SA384 Land at Rock Road, Storrington (Strategic Policy HA17)	The quantum of development has been reduced because of issues relating to tree coverage onsite and wider landscape impact of development on the open countryside to the north.	<p><u>Yes, significant changes have occurred.</u></p> <p>The quantum of development has been reduced to take account of landscape considerations and so the impact on SA 7 Landscape has been scored more favourably.</p> <p>The scale of development proposed has been reduced from 75 dwellings to 55 dwellings, but the site still has capacity for more than 10 dwellings, meaning it will make a contribution towards the Districts housing need and so a significant positive impact remains for SA1 Housing.</p>
SA361/SA732 Melton Drive, Storrington (Strategic Policy HA18)	<p>Recommendation from the HRA for this particular site to ensure a winter bird survey/HRA is carried out and appropriate mitigation is applied.</p> <p>Criterion added to ensure regard is given to Arun Valley SPA/RAMSAR. Any proposal is supported by HRA.</p> <p>Policy slightly amended to strengthen protection for a local heritage asset located adjacent to the site.</p>	<p><u>Yes, significant changes have occurred.</u> Increased protection for a listed building located adjacent to the site and Arun Valley SPA/RAMSAR has resulted in a more favourable score against SA objectives SA6: Biodiversity and SA8: Historic environment.</p>
SA039 Land at High Bar Lane (Strategic Policy HA19)	Policy amended slightly to include 'Preserve and enhance hedgerows and trees on site'.	No significant change to the Council's sustainability appraisal conclusions. Whilst the policy has been amended to preserve hedgerows and trees the sustainability appraisal criteria from the 2021 appraisal have not changed.
SA500 Land East of Hatches House (Strategic Policy HA21)	The quantum of development has increased from 6 to 8 dwellings	No significant change to the Council's sustainability appraisal conclusions. Whilst a larger scale development in this location will perform slightly better against the sustainability criteria of housing delivery, the potential of the site is still under 10 units and so the sustainability appraisal criteria from the 2021 appraisal have not changed.

The Strategic Impact of Water Neutrality on the SA Objectives

- 7.7 Although water neutrality was not considered by LUC in their original appraisal of the large and small sites, it has been considered for this updated SA/SEA Report. Having considered the strategic impact of water neutrality, the Council are retaining a neutral impact against SA11: Water Resources as the issue (on current understanding) affects all sites equally, meaning it is not necessary to revise the SA11 criteria against all policies. Improved water efficiency measures would result in a positive impact on this indicator, however development in the water resource zone would result in a negative impact, as such the two impacts would result in a neutral score and so the original appraisal scoring undertaken by LUC in 2021 remains.

Table 7.4 Appraisal of small sites that have been subject to significant changes.

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
Barns Green																	
SA510 (residential – 25 dwellings)	++	+	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
SA522 (residential) 20 dwellings	++	--/+	+	0	+	0	0	0	+	-	-	0	--/+	0	--/+	0	0
Billingshurst																	
SA892 (residential) -6 dwellings	++	--/+	+	0		0	0	0	+	-	-	0	--/+	0	--/+	0	0
Rudgwick and Bucks Green																	
SA794 (residential - 6 dwellings)	+	+	0	0?	-	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
Storrington																	
SA384 (residential - 55 dwellings)	++	++?	0	0?	++	--?	-?	-?	-	--?	0	-	+	--	+	0	+
SA361/SA732 (residential – 70 dwellings)	++	++?	0	0?	++	-?	--?	--?	--?	--?	0	-	+	--	+	0	+

7.8 A small number of sites have been removed from consideration as an allocation since the draft LUC Regulation 19 SA Report in July 2021, either because they are no longer deemed suitable for development or because they have since been given planning permission. (It should be noted that sites very recently granted planning consent may still remain in this version of the SA but may be removed from later SA updates.) Several further smaller sites were assessed by LUC as ‘reasonable alternatives’ albeit have at no stage been put forward for Local Plan allocation. All of the removed sites are listed in Table 7.5 along with the reasons for not being proposed for allocation in the draft (Regulation 19) Local Plan.

7.9 A fuller explanation of their reasons for not being included as allocations can be found in the Site Assessment Report (which is available at www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base).

Table 7.5: Sites appraised as reasonable alternatives but not included for allocation

Small Site Name	Reason for Removal
Ashington	
SA085 (residential - 20 dwellings)	These sites are part of the Northern Cluster promotion. The Northern Cluster has not been allocated because of the cumulative impact on local infrastructure. The scale of development proposed would not be in line with the scale and function of the village
SA122/SA131/SA548/SA735/SA085 collectively known as the Northern Cluster	
SA520 (residential – 95 dwellings)	
SA539 (residential – 80 dwellings)	
Barns Green	
SA344	The site is not suitable for an allocation in the LP because the presence of ancient woodland, watercourse and TPOs across the site would impact on the potential access and the implementation of the site.
SA613	This site was given planning permission in October 2023, for 30 dwellings and has subsequently been removed as an allocation. Its reference is DC/21/2697
Billingshurst	
SA560	This site is not allocated for residential development for issues relating to landscape capacity and biodiversity constraints. Furthermore, the site is not particularly well related to the existing services and facilities in Billingshurst.
SA698	This site is located east of a new urban extension of Billingshurst. Development would extend development into the open countryside and the site relates poorly with existing facilities and local services. Issues relating to biodiversity and the archaeological notification area which requires investigation.
SA607	Development of this site would extend the village further into the open countryside in an area identified for limited capacity for development. Biodiversity assessments are

	also required to assess if protected species are impacted from development.
SA678	This site is not allocated for residential development for issues relating to landscape capacity and biodiversity constraints. The site is not particularly well related to the existing services and facilities in Billingshurst on which it would rely and sustainable transport links to these sites are currently limited. For the above reasons, it is not proposed to allocate this site.
SA770	This site is not allocated for residential development for issues relating to landscape capacity and biodiversity constraints. This site is not allocated for residential development for issues relating to landscape capacity and biodiversity constraints. Development in this location would therefore have an adverse impact on the wider landscape and would give rise to further eastward urbanisation of the settlement and the sense of urban sprawl.
Broadbridge Health and Slinfold	
SA102	This site was rejected for residential development. The site is in close proximity to the existing commercial uses to the east and south it is considered that the potential impact on the amenity of future users (e.g. noise and lighting) means this site is not suitable for residential development. Development for housing could also have a negative impact on the operation of existing employment sites.
SA622 (retirement homes)	The site was won on appeal. Appeal Approved: DC/19/1897 - APP/Z3825/W/20/3262938 - Land at Wellcross Farm
Christ Hospital	
SA129	The site was removed because the delivery and implementation of the site could not be realised or confirmed.
Cowfold	
SA366	The site was not considered for allocation because of issues relating to heritage, landscape, biodiversity and the AQMA. Furthermore, the scale of development planned for the village would put stress on existing local infrastructure.
Henfield	
SA005	The whole of Land north of Furners Lane is not recommended for allocation subject to the scale of development impacting on the wider landscape, stress on the capacity of existing infrastructure and securing adequate safe access.
Horsham	
SA568 (mixed use)	Land around Mercer Road has been taken forward as an allocation for solely residential development in the Local Plan hence the scheme originally promoted for this site proposal is superseded.

Lower Beeding	
SA657	Development in this location would extending ribbon development along the B2115 to the west to the detriment to the character of the village. There is low-moderate capacity for small scale housing with the site is highly visible from the west and north. Existing services are limited in the village and the cumulative impact of development would put additional strain on local infrastructure.
SA729	The site would not be suitable for development in isolation, given its separation from the built-up area boundary (BUAB) by another dwelling. Development would extend ribbon development along the B2115 and further urbanise an edge of settlement location.
SA575	The site was given planning permission in January 2022 for 22 Dwellings: Planning Reference DC/22/0708 and has subsequently been removed as an allocation.
Partridge Green	
SA634	The site is located on the edge of the settlement and in isolation the site lies beyond the existing settlement boundary and would have to be considered as part of a comprehensive proposal. Development of this site would extend development into the open countryside and its location does not relate well with existing services and facilities in the village. The site is not considered for residential development.
SA891	<p>This site was not previously subject to SEA/SA because it is a new site promoted to the Council in recent months. It has been rejected on the grounds on heritage, landscape and with a number of sites being promoted in Partridge Green which relate better to the built-up area boundary of Partridge Green and its facilities and have fewer constraints including landscape and heritage. Furthermore, the proposal would result in a discordant extension of the village form as it increases the village footprint west of Bines Road and the Downslink in a somewhat detached extension of the settlement and against the prevailing historic pattern of the village.</p> <p>Therefore, it is the Council's view that development at this location and at the quantum proposed is not suitable for allocation.</p>
Pulborough	
SA112 Greendene, Pulborough	This site was removed from the Regulation 19 Local Plan due to concerns over suitability.

SA588 allocated site CLT	This site has been put forward as a Community Land Trust Site exception site. Whilst it is a proposed allocation in the emerging Pulborough Neighbourhood Plan, it is considered a rural exception site and therefore not appropriate for allocation in the Local Plan.
SA445	The site was granted planning permission on 7 July 2023 for DC/21/2321 and has subsequently been removed as an allocation.
Rudgwick	
SA442	The site is not considered suitable for development because of the impact of the site on the wider landscape and the potential negative impact on the setting of local heritage assets adjacent to the site.
SA683	The site is not allocated on grounds of the development potentially having a negative impact on the setting of the Conservation Area. The site is also located with archaeological notification area which requires investigation in the ground to prevent heritage assets from being disturbed, damaged, or destroyed without being recorded first.
Rusper	
SA737	The site is not considered for residential development. Further Investigation on protected species is required and the presence of ancient woodland will require appropriate buffers to development which will impact on the quantum of development this site can deliver.
SA465	This site was given planning permission in October 2023, subject to the signing of a S106 and has subsequently been removed as an allocation. Its reference is DC/21/2172/Ful (6 dwellings),
Small Dole	
SA505	The site is not considered for residential development subject related to to issues such as contamination/environment quality, impact on amenity adjacent dwellings and access being resolved to an acceptable standard in planning terms. The site is also relatively distant from local services and facilities in Small Dole.
Southwater	
SA324	The site is not suitable for development because of presence of TPOs and the intensification of development at this edge of settlement location would impact negatively on the character of the area which is located on the edge of settlement location
SA701	This site, known as Rascals Farm, gained planning permission on appeal. As it has planning permission, and notwithstanding the Council's view on its suitability, there would be no need to allocate the site for it to come forward.
SA725	The site is not considered suitable for allocation. The presence of ancient woodland would constrain the net

	developable area suitable for development and provide evidence of safe and appropriate access would question if the site can be implemented or deliverable.
SA743	The site has potential for allocation, though development at this location would have to address biodiversity and landscape issues which may limit the number of homes that could be provided.
Storrington	
SA639	SA639 has issues concerning wider landscape impact, biodiversity, flood risk impacting on certain areas of the site and environmental quality. For those reasons, the site is not considered appropriate for allocation.
Thakeham	
SA513	The site does not have potential for allocation due to the likely negative impact on a number of mature oak trees, all of which are covered by a Tree Preservation Order. Development of the site is likely to result in damage or loss to a number of trees that form part of the existing feeding habitats of bats which should be retained.
Warnham	
SA070	The site is not considered suitable for allocation given the potential for significant harm to the setting of the numerous listed buildings and the Warnham Conservation Area to the west of the site. Further constraints concerning the impact of development negatively impacting on the wider landscape would also prohibit this site coming forward as an allocation.

7.3 Appraisal of Changes to Policies

- 7.10 Table 7.6 below identifies the changes to Local Plan Policies which have taken place compared with the July 2021 Cabinet version of the Local Plan and assesses whether or not those changes have been significant in terms of sustainability.

Table 7.6: Key Changes to Policy to draft Regulation 19 Local Plan since July 2021

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
Strategic Policy 1	Strategic Policy 1	Sustainable Development	No change (NB: this is a standard government policy)	No
Strategic Policy 2	Strategic Policy 2	Development Hierarchy	Thakeham (The Street and High Bar Lane) re-classified as a 'Smaller Village'	Yes
Strategic Policy 3	Strategic Policy 3	Settlement Expansion	No Change	No
Strategic Policy 4	Strategic Policy 4	Horsham Town	No Change	No
Strategic Policy 5	Strategic Policy 5	Broadbridge Heath Quadrant	No Change	No
Strategic Policy 6	Strategic Policy 36	Climate Change	No Change	No
Strategic Policy 7	Policy 37	Appropriate Energy Use	Policy number changed and updated to a Strategic Policy Reference to 'Be Seen' added to criterion 1c	Yes
Strategic Policy 8	Strategic Policy 38	Sustainable Design and Construction	Policy number changed Criterion 1 a - updated to reflect 2021 Edition of 2010 Building Regulations (Part L) Criterion 1b updated to incorporate a Fabric First approach to maximise the	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			performance of building components and materials. Criterion 1 c and 1 d - Water efficiency criterion removed – replaced with new Water Neutrality policy	
Strategic Policy 9	/	Water Neutrality	New policy, reflecting need for the Local Plan to demonstrate water neutrality. Policy drafted alongside colleagues from other authorities to ensure consistency across the authorities affected by water neutrality	Yes
Strategic Policy 10	Strategic Policy 39	Flooding	Policy number changed No Change to policy	No
Strategic Policy 11	Strategic Policy 24	Environmental Protection	Policy number changed No Change to policy	No
Strategic Policy 12	Strategic Policy 25	Air Quality	Policy number changed Updated to ensure that air quality mitigation takes place during both construction and operation stages of development.	Yes
Strategic Policy 13	Strategic Policy 26	The Natural Environment and Landscape Character	Policy number changed	No

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Minor updates to make reference to Local Nature Recovery Strategy (as required by Environment Act 2021)	
Strategic Policy 14	Strategic Policy 27	Countryside Protection	Policy number changed No Change to policy Reference to Neighbourhood Plan designations and High Weald AONB Management Plan objectives added to criterion 2c	No
Strategic Policy 15	Strategic Policy 28	Settlement Coalescence	Policy number changed No Change to policy	No
Strategic Policy 16	Strategic Policy 29	Protected Landscapes	Policy number changed No Change to policy	No
Strategic Policy 17	Strategic Policy 30	Green Infrastructure and Biodiversity	Policy number changed Biodiversity net gain threshold has been increased to 12% and requirement for other developments (other than large scale) to contribute to biodiversity net gain. Requirement that Green Infrastructure should be integral to the design and layout of new development. New linkages should take into account Natural England's Green	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			<p>Infrastructure Guidance and the Councils Green Infrastructure strategy.</p> <p>Additional requirement for consideration to be given to the provision of at least one new tree per five dwellings / 1,000sqm commercial floorspace. Applicants are encouraged to apply Natural England's urban greening factor standards or to seek to ensure at least 60% of the site area is permeable (including green / biosolar roofs).</p> <p>New requirement for an appropriate buffer around woodland</p>	
Policy 18	Policy 31	Local Green Space	<p>Policy number changed</p> <p>No Change to policy</p>	No
Strategic Policy 19	Strategic Policy 32	Development Quality	<p>Policy number changed</p> <p>Supportive text updated to make reference to beautiful buildings and places.</p>	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Criterion 1 amended to refer to the Building for a Healthy Life design toolkit Additional criteria added to encourage good street design that prioritises pedestrians and cyclists – which in turn will improve health	
Strategic Policy 20	Strategic Policy 33	Development Principles	Policy number changed Criterion 7 – updated to include reference to provision of tree lined streets Additional criterion added to ensure street design is attractive and inclusive	Yes
Policy 21	Policy 34	Heritage Assets and Managing Change within the Historic Environment	Policy number changed No Change to policy	No
Policy 22	Policy 35	Shop Fronts and Advertisements	Policy number changed No Change to policy	No
Strategic Policy 23	Strategic Policy 40	Infrastructure Provision	Policy number changed No Change to policy	No
Strategic Policy 24	Strategic Policy 41	Sustainable Transport	Policy number changed	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			<p>Changes to the policy and supporting text, to reflect some of the recommendations of the Sustainable Transport Task and Finish Group including reference to e-cycles, Gear Change L TN1/20.</p> <p>Policy now emphasises need to comply with the National Design Guide and the National Design Code. Changes to transport mitigation measures to reflect updated spatial strategy.</p>	
Policy 25	Policy 42	Parking	<p>Added references to “adopted parking standards guidance”. Emphasised that cycle storage must be conveniently located. Added plug in facilities for electric cycle and mobility scooters.</p> <p>Emphasised importance of achieving ‘people focussed streets’</p> <p>Added reference to mobility scooters</p>	Yes
Policy 26	Policy 43	Gatwick Airport Safeguarding	Minor amendments to the supporting text to reflect the latest updates to the Government’s Aviation Strategy	No

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			and advice from Gatwick Airport Ltd on the aerodrome safeguarding zone.	
Strategic Policy 27	Strategic Policy 44	Inclusive Communities, Health and Wellbeing	Policy number changed No Change to policy	No
Policy 28	Policy 45	Community Facilities, Leisure and Recreation	Policy number changed No Change to policy	No
Strategic Policy 29	Strategic Policy 6	New Employment	Deletion of references to employment allocation at Buck Barn. Restriction of E(g) use classes outside defined centres to ensure town centre uses are focussed within the centres.	No
Strategic Policy 30	Strategic Policy 7	Enhancing Existing Employment	Policy number changed Additional criterion added requiring trade counters to demonstrate that they are ancillary to an employment use and will not prejudice the operation of surrounding uses	No
Policy 31	Policy 8	Rural Economic Development	Policy number changed No Change to policy	No

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
Policy 32	Policy 9	Conversion of Agricultural and Rural Building to Commercial, Community and Residential Uses	Policy number changed No Change to policy	No
Policy 33	Policy 10	Equestrian Development	Policy number changed No Change to policy	No
Strategic Policy 34	Strategic Policy 11	Tourism Facilities and Visitor Accommodation	Policy number changed No Change to policy	No
Strategic Policy 35	Strategic Policy 12	Town Centre Hierarchy and Sequential Approach	Policy number changed No Change to policy	No
Strategic Policy 36	Strategic Policy 13	Town Centre Uses	Policy number changed No Change to policy	No
Strategic Policy 37	Strategic Policy 14	Housing Provision	Reduction in housing target from 1,100 homes a year to an average of 880 (which includes a 10% buffer). Based on a housing trajectory of 600 homes for years 1-5 and 1,000 a year thereafter.	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Removal of Buck Barn new settlement as an allocation	
Strategic Policy 38	Strategic Policy 15	Meeting Local Housing Needs	Policy number changed No Change to policy	No
Policy 39	Policy 16	Affordable Housing	Removal of requirement for 25% of all affordable homes on a site to be First Homes (but does not prevent their provision) New text to state that eligibility for First Homes will be limited to income threshold The policy now states that social rented housing will be prioritised over affordable rented, provided the site and its location are appropriate as informed by local evidence Requirement for affordable housing on Land West of Ifield increased to 40%.	Yes
Policy 40	Policy 17	Improving Housing Standards in the District	Minor update to the supporting text to reflect latest Census data and small policy wording amendment to clarify that developers must meet the full	No

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			requirement for Wheelchair User dwellings.	
Policy 41	Policy 18	Rural Exception Homes	Policy number changed No Change to policy	No
Policy 42	Policy 19	Retirement Housing and Specialist Care	Policy number changed No Change to policy	No
Strategic Policy 43	Strategic Policy 20	Gypsies and Travellers	Lane Top, Pulborough (5 pitches) and Buck Barn strategic site (15 pitches) removed as draft allocations. Fryern Park, Storrington added as draft allocation for additional 2 G&T pitches following appeal which concluded no planning impediment to pitch provision on this site. Overall draft allocation for 52 G&T pitches, down by 18 from 70 net additional pitches.	?
Policy 44	Policy 21	Rural Workers Accommodation	Policy number changed No Change to policy	No
Policy 45	Policy 22	Replacement Dwellings and Housing Extensions in the Countryside	Policy number changed No Change to policy	No
Policy 46	Policy 23	Ancillary Accommodation	Policy number changed	Yes

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Criterion 3 amended to include the word 'visual' Slight change to policy wording removing the requirement for annexes to be attached to the host dwelling, but stating that they must be used for ancillary purposes. A sequential approach for ancillary accommodation was also added	
Strategic Policy HA1	Strategic Policy HA1	Strategic Development Principles	Removal of reference to new settlement	No
Strategic Policy HA2	Strategic Policy HA2	Land West of Ifield	Quantum of housing changed to approximately 3,000 (previously 3,250), Reflection of 1,720 delivery in the plan period and affordable housing requirement changed to 40% (from 35%) to reflect relationship of site with Crawley Update to 12% biodiversity net gain requirement	Yes : This appraisal is documented in Table 7.2
Strategic Policy HA3	Strategic Policy HA3	Land North-West of Southwater	Allocation of 1200 Reflection of 720 homes deliverable in the plan period	Yes : This appraisal is documented in Table 7.2

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Update to 12% biodiversity net gain requirement Additional requirement for equipped children's play facilities and social seating areas added to criterion 2e.	
Strategic Policy HA4	Strategic Policy HA4	Land East of Billingshurst (RF)	Update to 12% biodiversity net gain requirement Additional requirement for equipped children's play facilities and social seating areas added to criterion 2e. Criterion f amended to require phased provision in accordance with railway safety requirements and land safeguarded for wheelchair accessible provision.	Yes : This appraisal is documented in Table 7.2
N/A	Strategic Policy HA5	Land at Buck Barn	Site Removed	/
Strategic Policy HA5	Strategic Policy HA6	Ashington	Policy number changed No Change to policy	No
Strategic Policy HA6	Strategic Policy HA7	Barns Green	Inclusion of Old School Site (20 units) to reflect the Neighbourhood Plan allocation (which is not yet a Made Plan due to Water Neutrality delay)	No – the removal of units at Slaughterford Farm from HA6 will not impact the overall sustainability of the plan as they are still to

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
			Removal of 30 units at Slaughterford Farm as these have now been given planning permission	be delivered. They have simply moved from an allocation to a commitment.
Strategic Policy HA7	Strategic Policy HA8	Broadbridge Heath	Policy number changed Allocation reduced from 150 units to 33 Reference to Flood Zones 2 and 3 added to policy wording	Yes : This appraisal is documented in Table 7.3
N/A	Strategic Policy HA9	Christ's Hospital	Site Removed	/
Strategic Policy HA8	Strategic Policy HA10	Cowfold	Policy number changed No Change to policy	No
Strategic Policy HA9	Strategic Policy HA11	Henfield	Policy number changed No Change to policy	No
Strategic Policy HA10	Strategic Policy HA12	Horsham	Added criterion to HOR 1 Land at Hornbrook Farm to include safe pedestrian and cycling crossing to be provided. Added references to Active Travel links in to HOR2 Land at Mercer Road and also made the 50 spaces parking requirement at Warnham Railway Station a minimum requirement rather than optional	Yes : This appraisal is documented in Table 7.3

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
N/A	Strategic Policy HA13	Kilwood Vale	Site Removed	/
Strategic Policy HA11	Strategic Policy HA14	Lower Beeding	Inclusion of Land at Cyder Farm (6 units) to reflect the Neighbourhood Plan allocation (which is not yet a Made Plan due to Water Neutrality delay) SA575 20 units at north of Sandygate Lane removed as they have now been granted planning permission	Yes- this assessment is documented in Table 7.3 The removal of units at North of Sandygate Lane will not impact the overall sustainability of the plan as they are still to be delivered. They have simply moved from an allocation to a commitment
Strategic Policy HA12	N/A	Partridge Green	New site allocations: Land North of the Rosary (West of Church Road) Land North of the Rise Land at Dunstans Farm Policy criterion included to improve connectivity between Land north of the Rise and Land at Dunstan Farm.	Yes- this assessment is documented in Table 7.3
Strategic Policy HA13	Strategic Policy HA15	Pulborough	Policy number changed SA445 170 units at New Place Farm removed as they have now been granted planning permission	No -the removal of units at New Place Farm will not impact the overall sustainability of the plan as they are still to be delivered. They have simply moved from an allocation to a commitment

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
Strategic Policy HA14	Strategic Policy HA16	Rudgwick and Bucks Green	Additional criterion added to RD1 to protect heritage assets. 6 dwellings at Land East of South Street removed as they now have planning permission	Yes- this assessment is documented in Table 7.3 The removal of units at land East of South Street will not impact the overall sustainability of the plan as they are still to be delivered. They have simply moved from an allocation to a commitment
Strategic Policy HA15	Strategic Policy HA17	Rusper	Policy number changed 6 units at SA465 removed from policy as they have now been given permission	Yes- this assessment is documented in Table 7.5
Strategic Policy HA16	Strategic Policy HA18	Small Dole	Policy number changed No Change to policy	No
Strategic Policy HA17	Strategic Policy HA19	Steyning	Policy number changed No Change to policy	No
Strategic Policy HA18	Strategic Policy HA20	Storrington and Sullington	Amendment to wording to improve protection for heritage assets (Policy STO2)	Yes- this assessment is documented in Table 7.3
Strategic Policy HA19	Strategic Policy HA21	Thakeham (The Street and High Bar Rise)	Policy number changed No Change to policy	No
Strategic Policy HA20	Strategic Policy HA22	Warnham	Policy number changed No Change to policy	No

Policy No (Local Plan Dec 2023)	Policy No (July 2021 Cabinet version of the Local Plan)	Policy Name	Summary of change(s)	Is Change deemed Significant in Sustainability terms?
Strategic Policy HA21	Strategic Policy HA23	West Chiltonton and West Chiltonton Common	Policy number changed No Change to policy	No

7.11 Table 7.7 carries out an appraisal of those policies deemed to have been subject to a significant change. The paragraphs following Table 7.7 explain the appraisal of the updated policies in more detail.

7.12 The full appraisal of all policies can be found in Chapter 8. The supporting text outlining the appraisal of policies that have not been updated can be found in the draft Regulation 19 SA Report.

Table 7.7 Appraisal of Policies which have been subject to a significant change post 2021

Policy No/ SA Objective	Strategic Policy 2: Development Hierarchy	Strategic Policy 7: Appropriate Energy Use	Strategic Policy 8: Sustainable Design and Construction	Strategic Policy 9: Water Neutrality	Strategic Policy 12: Air Quality	Strategic Policy 17 : Green Infrastructure and Biodiversity	Strategic Policy 19: Development Quality	Strategic Policy 20: Development Principles
SA1: Housing	+	0	0	-	0	0	+	+
SA2: Access to services and facilities	++/-	0	0	0	0	0	0	0
SA3: Inclusive communities	++	0	+	0	0	0	+	++
SA4: Crime	0	0	0	0	0	0	+	+
SA5: Health and wellbeing	+/-	0	0	0	+	++	++	++
SA6: Biodiversity and geodiversity	0	0	0	++	++	++	+	+
SA7: Landscape	+	+	0	0	+	+	++	++
SA8: Historic environment	+	0	+	0	0	0	++	+
SA9: Efficient land use	++	0	0	+	0	0	+	++
SA10: Natural resources	0	0	+	++	0	0	0	0
SA11: Water resources	0	0	++	++	0	++	+	0
SA12: Flooding	0	0	0	0	0	+	+	+
SA13: Transport	+/-	0	0	0	++	+	+	+
SA14: Air quality	+/-	0	0	0	++	+	+	+
SA15: Climate change	+/-	++	++	++	++	++	+	+
SA16: Economic growth	0	+	0	-	0	0	+	+
SA17: Access to employment opportunities	+/-	0	0	0	0	0	0	0

(continues over page)

Policy No/ SA Objective	Strategic Policy 24: Sustainable Transport	Strategic Policy 25: Parking	Strategic Policy 29: New Employment	Strategic Policy 30: Enhancing Existing Employment	Strategic Policy 37: Housing Provision	Policy 39: Affordable Housing	Strategic Policy 46
SA1: Housing	0	0	0	0	++	++/-?	+
SA2: Access to services and facilities	++	+	++	+/-	++/-	0	0
SA3: Inclusive communities	++	++	+	+	+	+	+
SA4: Crime	0	+	0	0?	0	0	0
SA5: Health and wellbeing	++	+/-	+	+/-	++/--	0	0
SA6: Biodiversity and geodiversity	0	0	--?	-?	--?	0	0
SA7: Landscape	0	0	--?	+/-?	--?	0	+
SA8: Historic environment	0	0	--?	+/-?	--?	0	+
SA9: Efficient land use	0	0	--	+	--/+	0	+
SA10: Natural resources	0	0	-?	-?	--?	0	0
SA11: Water resources	0	0	0	0	-	0	0
SA12: Flooding	0	0	-	0	--?	0	0
SA13: Transport	++	+/-	+/-	+	++/-?	0	0
SA14: Air quality	++	+/-	+/-	+/-	++/-	0	0
SA15: Climate change	++	+/-	+/-	+	++/-	0	0
SA16: Economic growth	++	+	++	++	++/-	0	0
SA17: Access to employment opportunities	++	++	++	++	++/-	0	0

7.4 Summary of Findings for Policies seeing a Significant Change

Strategic Policy 2: Development Hierarchy

- 7.13 Strategic policies 1 to 4 set out the Council's overarching approach to delivering new development within and as expansions to settlements in Horsham. It is recognised through Policy 2 that development should be of a scale and nature to maintain settlement roles in terms of service provision. The draft Regulation 19 LUC SA Report (July 2021) concluded generally positive effects for social objectives (in particular for SA2: Access to services and facilities), and mixed positive/negative effects for environmental and economic objectives.
- 7.14 The only significant change has been to Strategic Policy 2: Development Hierarchy, which is the change of status in the settlement hierarchy of Thakeham. This village settlement has been changed from a 'medium village' to a 'small village'. This may have the effect of reducing the degree of infilling and redevelopment permitted within the built-up area boundary but is not in practice expected to have any significant strategic effect on the way the pattern of development at the settlement evolves, nor on overall environmental impacts. Therefore, the effects shown in the appraisal have not changed.

Strategic Policy 7: Appropriate Energy Use

- 7.15 This policy was previously numbered Strategic Policy 37 and seeks to ensure that future development in Horsham district considers the most appropriate energy use as a means of improving energy efficient. The policy now includes a new criterion to 'Be Seen' which will ensure energy performance is monitored, verified, and reported. Whilst this is likely to lead to an improvement in energy efficiency and as such have a positive impact on SA 15: Climate Change, the impact recorded was already a significant positive and so the effects shown in the appraisal have not changed.

Strategic Policy 8: Sustainable Design and Construction

- 7.16 Previously numbered Strategic Policy 38, this policy relates to how built development will need to adapt to climate change and other environmental sensitivities. The significant changes are an update to reflect the latest edition of the Building Regulations Part L, the removal of the water efficiency criterion and the addition of a Fabric First Approach.

- 7.17 The first has the effect of reducing 'dwelling emission targets' for homes to a mandatory 31% whereas the earlier version of the policy required a 35% reduction. The requirement for a minimum 10% reduction in energy efficiency standards has also been removed. The addition of the Fabric First Approach will prioritise the energy efficiency of a property right from conception. Whilst these figures are changed, it is considered the overall effect on SA objectives (in particular SA15: Climate Change) is not altered, because the intention of the national changes to building regulations hold statutory weight and is therefore a more powerful tool than the Local Plan policy. The net effect is therefore similar, hence there is no change to the appraisal outputs.
- 7.18 The second, relating to water efficiency requirements, is a result of a new water neutrality policy being introduced which gives a far more sophisticated and strengthened approach. The policy objective has not changed but because it is relocated, the effect for SA11: Water resources is changed from '++' to '0' (neutral effect).

Strategic Policy 9: Water Neutrality (new policy)

- 7.19 Chapter 6 of this report explains the reasons for including this policy. The policy will have negative impacts on SA objective 1: Housing and SA objective 16: Economic Growth. This is because it in effect limits the amount of housing and employment land that the Local Plan can allocate to a number that is considered realistically achievable whilst being able to offset water use.
- 7.20 Policy 9 will have a significant positive impact on SA objective 6: biodiversity and geodiversity, SA objective 10: natural resources, SA objective SA11: water resources, and SA objective 15: climate change. The main aim of the policy is to ensure that water levels in the Sussex North Water Resource Zone remain at a level that protects the integrity of sites of international nature conservation importance. This policy protects water levels through a combination of reduced water use for new development and offset for the remaining water used. In turn, this protects the district's biodiversity; protects other natural resources such as high-quality agricultural land through reduced development pressure and adequate water levels; and reduces the greenhouse gases emitted in treating and transporting water, and from building and operating new housing and employment sites.
- 7.21 Policy 9 will also have a positive impact on SA 9: efficient land use. The reduction in housing numbers as a result of the policy helps to minimise the use of greenfield land and high-quality agricultural land.

Strategic Policy 12: Air Quality

- 7.22 The only significant change to this policy (previously numbered 25) is a clarification added to the criterion requiring developers to mitigate air quality related impacts, as outlined in the Air Quality and Emissions Guidance for Sussex 2021. This now clarifies that this requirement applies to both the construction and operation phases.
- 7.23 This may have the effect of further improving air quality as it now explicitly includes the build phase. However, as the previous appraisal already recorded a ‘++’ against SA14: Air quality, there is no change to the appraisal outputs.

Strategic Policy 17: Green Infrastructure and Biodiversity

- 7.24 The significant change to this policy (previously numbered 30) is an increase to the biodiversity net gain minimum target from 10% to 12%, as a result of emerging local evidence. This is likely to have a positive effect against SA6: Biodiversity and geodiversity. There is also an additional requirement that Green Infrastructure should be integral to the design and layout of new development and that new linkages should consider Natural England’s Green Infrastructure Guidance and the Councils Green Infrastructure strategy. A new requirement for an appropriate buffer around woodland has also been added.
- 7.25 The changes to this policy are likely to encourage healthier lifestyle choices in the District, meaning a strong positive effect has been recorded against SA Objective 5. They will also contribute to local landscape character; help improve air quality and climate change. However, as the previous appraisal already recorded a ‘++’ against SA Objective 6 and a ‘+’ against SA Objectives 7, 14 and 16 no changes have been recorded against these objectives.

Strategic Policy 19: Development Quality

- 7.26 The significant change to this policy (previously numbered Policy 32) is additional wording added to the supportive text to make reference to ‘beautiful buildings and places’. Criterion 1 was amended to refer to the ‘Building for a Healthy Life design toolkit’ and an additional criterion added to encourage low traffic neighbourhoods with good street design that prioritises pedestrians and cyclists. The amendment to this policy is likely to have a positive impact on people’s health and well-being as well as improving air quality and creating a more inclusive community. A minor positive impact was previously recorded against SA Objectives SA3 and SA14 and this remains. However, the impact on SA5 Health and Well Being has been increased to a strong positive.

Strategic Policy 20: Development Principles

- 7.27 The significant change to this policy is the introduction of a requirement for new development to provide tree-lined streets and provide trees in open spaces and elsewhere. This is in response to a new requirement included in the NPPF which is expected to be also included in local plans.
- 7.28 An additional criterion has also been added to ensure street design is attractive and inclusive, meeting the needs of all users – with particular consideration given to disability age, gender and those with caring responsibilities. This change is likely to have a positive effect on the inclusivity of design.
- 7.29 The LUC SA appraisal already noted several positive effects including a strong positive for SA7: Landscape. Tree lined streets is likely to amplify this effect. The LUC SA commentary notes the important contribution that green infrastructure makes to general wellbeing and inclusive communities therefore the effect for SA3 Inclusive Communities and SA5: Health and wellbeing has been changed from a minor positive ('+') to a significant positive ('++') effect.

Strategic Policy 24: Sustainable transport

- 7.30 This policy has seen significant changes, including in its supporting text, to strengthen requirements relating to prioritisation of sustainable travel. In particular, it now expects new development to respond to the Government paper 'Gear Change' which promotes cycling (and improvements to cycling infrastructure) and also more strongly references the technical guide Local Transport Note (LTN) 1/20: - Cycle Infrastructure Design). Additionally, there have been changes to the supporting text to encourage design to be focused on people and not vehicles and a number of strategic improvements have been listed and identified as necessary to ensure road junctions in the District operate safely.
- 7.31 The LUC report already recorded '++' against several objectives including SA2: Access to services and facilities, SA3: Inclusive communities, SA13: Transport, SA14: Air quality, and SA15: Climate Change. Therefore, only one output is changed, which is to change SA5: Health and wellbeing from a '+' (minor positive) to a '++' (significant positive).

Policy 25: Parking

- 7.32 The changes made to this policy are firstly a clarification that parking must be provided 'in accordance with adopted parking standards guidance', secondly a clarification that cycle parking 'must be conveniently located' for users, and thirdly clarification that plug-in charging facilities should be provided for electric cycles and mobility scooters (as well as electric cars).
- 7.33 The changes also ensure that consideration is given to the mobility impaired with a specific reference to mobility scooters.
- 7.34 Whilst there may be some positive effects on objectives for transport, health and wellbeing, access to services and facilities, and climate change, these are not considered to be impactful overall as the policy also promotes provision of private car parking which is likely to lessen the positive impacts. Hence there is no change to the appraisal outputs. That said, the change to include specific consideration to the mobility impaired is likely to make new development more inclusive and so a strong '++' positive impact has been recorded.

Strategic Policy 29: New employment

- 7.35 The significant changes to this policy are the deletion of reference to allocation of employment land at the Buck Barn site (due to the removal of the site as an allocation), and the restriction of non-town centre commercial uses to E(g) use classes (which relate to offices, research and development businesses and light industrial purposes).
- 7.36 The deletion of reference to employment at Buck Barn is not considered to impact on effects against SA16: Economic growth as there is already shown to be significant surplus of supply against identified demand even without the benefit of the Buck Barn employment land. SA17: Access to employment opportunities is similarly unaffected as there will now be no housing being built in the vicinity of what would have been the employment land.
- 7.37 There is a possibility that the change may weaken slightly the positive effect recorded by LUC for SA2: Access to facilities and services, on a very local scale (as non-office/industrial uses might provide local communities with more choice and better accessibility to other commercial services). However, this is countered by a strengthened positive effect relating to the accessibility to town centre areas particularly by sustainable travel. Hence there is no change to the appraisal outputs.

Strategic Policy 30: Enhancing Existing Employment

- 7.38 The main change to this policy is an additional criterion requiring proposals seeking trade counters to demonstrate they are ancillary to employment use. Whilst this is likely to have a positive impact on SA16 Economic Growth in that it will not prejudice existing employment uses. A ‘++’ impact was already recorded against this objective and so there will be no change to the original appraisal outputs.

Strategic Policy 37: Housing provision

- 7.39 A significant change has been made to the housing supply target, and a strategic site (Buck Barn) has also been removed as an allocation that would otherwise have contributed to housing supply. The housing target is now an average 777 homes a year which takes account of the need for a 10% supply uplift or ‘buffer’ during years 1-5 of the Plan period. This is significantly less than the 1,100 homes a year set out in the July 2019 version of the policy.
- 7.40 There is a clearly changed effect in relation to SA1: Housing as less housing will be delivered. However, the score assigned to this objective is not changed as this policy still performs very strongly for this objective compared with other policies in the draft Plan. It is, however, considered that the removal of Buck Barn changes the ‘+/-’ (mixed positive and negative effects) for SA3: inclusive communities to a ‘+’ (minor positive) effect as the negative effect had related to the challenges of building a new settlement community ‘from scratch’. A further change is to the effect on SA11: Water Resources. The new requirement for water neutrality removes some of the uncertainty on these impacts therefore the criterion changed from a ‘-?’ to just a ‘-’ (minor negative), which assumes full implementation of water neutrality requirements.
- 7.41 In terms of transport and air quality, there are likely different effects on SA13: transport and SA14: air quality. The former remains unchanged given there is a greater positive effect from less development overall (as shown in emerging transport modelling evidence). The latter is changed from a ‘++/--’ to a ‘+/-’ given a lessened impact on air quality arising from less traffic overall.

Strategic Policy 39: Affordable housing

- 7.42 This policy has been amended following the removal of a requirement that 25% of affordable homes should be First Homes (the preferred Government model of low-cost home ownership). The requirements for affordable housing on the Land West of Ifield site has also been increased from 35% to 40%.

- 7.43 Other changes include the introduction of an income-based eligibility cap and the requirement that social rented housing will be prioritised over affordable rented, provided it is in an appropriate site and location.
- 7.44 Whilst clearly significant in policy terms, the changes are not expected to change the scoring of effects against SA objectives. The only objectives not given a '0' (neutral) score by LUC were SA1: housing and SA3: inclusive communities, and the effects noted in the LUC appraisal relate to the overall benefit of delivering a mix of affordable housing types, albeit not enough to meet the need for affordable housing in the District.

Strategic Policy 39: Ancillary Accommodation

- 7.45 This policy (formerly policy 23) has been amended to include the word visual in the third criterion and there has been an amendment to the policy wording to remove the requirement for annexes to be attached to the host dwelling (stating that they must be used for ancillary purposes). A sequential approach for ancillary accommodation was also added.
- 7.46 Whilst these changes are significant in policy terms, the changes are not expected to change the scoring of effects against SA objectives recorded by LUC therefore the appraisal outcome for this policy remains the same.

8.0 Overall and Cumulative Effects of the Local Plan Review, and Mitigation

- 8.1 This Chapter is in three parts. The first part considers the overall effects of the Local Plan on the SA framework. A summary of the likely sustainability effects of all Local Plan policies is presented in Table 8.1, together with supporting text outlining the changes made to the Cumulative Impacts following updates to the local plan policies and large and small site allocations.
- 8.2 The second part of this Chapter considers the potential for in-combination effects with development proposals in the Local Plans prepared by neighbouring authorities.
- 8.3 The third part discusses mitigation measures to minimise any negative impacts of the Local Plan and enhance its positive impacts.

8.1 Overall plan impacts

- 8.4 Table 8.1 shows the impacts of all of the draft Regulation 19 Local Plan on the SA Framework. This appraisal brings together the findings of the LUC appraisal undertaken in 2021 (Chapter 5 of the draft Regulation 19 LUC SA Report) together with the changes appraised in Chapter 7 of this document.

Table 8.1 Summary of effects of the Horsham District Local Plan Policies on the SA Framework

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Policies for Growth and Change																	
Strategic Policy 1: Sustainable Development	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
Strategic Policy 2: Development Hierarchy	+	++/-	++	0	+/-	0	+	+	++	0	0	0	+/-	+/-	+/-	0	+/-
Strategic Policy 3: Settlement Expansion	++	++/-	+	0	+/-	0	+	+	0	0	0	0	+/-	+/-	+/-	+	++/-
Strategic Policy 4: Horsham Town	+	++	+	0	++	+	+	+	0	0	+	+	++	+	+	++	++
Strategic Policy 5: Broadbridge Heath Quadrant	+	++	+	+?	++/-	+?	+?	+/-?	+	0	0	0	++/-	+/-	+/-	++	++/-
Climate Change & Flooding																	
Strategic Policy 6: Climate Change	+	0	0	0	+	+	+	0	+	+	+	++	+	+	++	0	0
Strategic Policy 7: Appropriate Energy Use	0	0	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0
Policy 8: Sustainable Design and Construction	0	0	+	0	0	0	0	+	0	+	++	0	0	0	++	0	0
Strategic Policy 9: Water Neutrality	-	0	0	0	0	++	0	0	+	++	++	0	0	0	++	-	0
Strategic Policy 10: Flooding	0	0	0	0	0	+	0	0	0	0	+	++	0	0	+	0	0
Environmental Protection																	
Strategic Policy 11: Environmental Protection	0	0	0	0	+	++	+	0	++	0	++	+	0	++	++	0	0
Strategic Policy 12: Air Quality	0	0	0	0	+	++	+	0	0	0	0	0	++	++	++	0	0
Strategic Policy 13: The Natural Environment and Landscape Character	+	+	+	0	0	++	++	+	+	0	+	++	0	+	+	+	0
Strategic Policy 14: Countryside Protection	+	+	+	0	+	++	++	+	+	+	0	+	+	+	+	+?	0
Strategic Policy 15: Settlement Coalescence	-?	0	0	0	0	++	++	+	0	0	0	+	+	+	+	-	0
Strategic Policy 16: Protected Landscapes	-?	0	0	0	+	++	+++?	+	0	0	0	+	0	0	0	+/-	0
Strategic Policy 17: Green Infrastructure and Biodiversity	0	0	0	0	++	++	+	0	0	0	++	+	+	+	++	0	0
Policy 18: Local Greenspace	0	0	+	0	+	++	+	+	0	0	0	+	0	0	0	0	0
Development Quality, Design and Heritage																	
Strategic Policy 19 Development Quality	+	0	+	+	++	+	++	++	+	0	+	+	+	+	+	+	0

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Strategic Policy 20: Development Principles	+	0	++	+	++	+	++	+	++	0	0	+	+	+	+	+	0
Policy 21: Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	+	++	++	0	0	0	0	0	0	0	0	0
Policy 22: Shop Fronts and Advertisements	0	0	+	0	0	0	++	++	0	0	0	0	0	0	0	+	0
Infrastructure, Transport and Healthy Communities																	
Strategic Policy 23: Infrastructure Provision	+	++	++	+	++	0	0	0	0	0	+	0	+	+	+	0	0
Strategic Policy 24: Sustainable Transport	0	++	++	0	++	0	0	0	0	0	0	0	++	++	++	++	++
Policy 25: Parking	0	+	++	+	+/-	0	0	0	0	0	0	0	+/-	+/-	+/-	+	++
Policy 26: Gatwick Airport Safeguarding	+/-	0	0	0	-?	-?	-?	-?	0	0	0	0	-	-	-	++	+
Strategic Policy 27: Inclusive Communities, Health and Wellbeing	+	++	++	+	++	0	0	0	0	0	0	0	+	+	+	+	++
Policy 28: Community Facilities, Leisure and Recreation	0	++	++	+	++	+	+	0	0	0	0	0	+	+	+	0	0
Economic Development																	
Strategic Policy 29: New Employment ¹	0	++	+	0	+	--?	--?	--?	--	-?	0	-	+/-	+/-	+/-	++	++
Strategic Policy 307: Enhancing Existing Employment	0	+/-	+	0?	+/-	-?	+/-?	+/-?	+	-?	0	0	+	+/-	+	++	++
Policy 31: Rural Economic Development	0	0	+	0	+/-	+	+	+	0	0	0	0	-	-	-	++	++
Policy 32: Conversion of Agricultural and Rural Buildings to Residential Uses	+	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 33: Equestrian Development	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	+	0
Strategic Policy 34: Tourism Facilities and Visitor Accommodation	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	++	+
Strategic Policy 35: Town Centre Hierarchy and Sequential Approach	0	++	++	0	+	0	+	+	0	0	0	0	+	+	+	++	+

¹ Policy 6: New Employment proposes the allocation of employment land at the proposed strategic site allocations as well as at sites Land South of Star Road Industrial Estate, Partridge Green; Land to the West of Graylands Estate, Langhurstwood Road; Horsham; Land at Broomers Hill Business Park, Pulborough; and Land South West of Hop Oast Roundabout. These four sites were appraised as site options SA063; SA363; SA385; and SA703, respectively.

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Strategic Policy 36: Town Centre Uses	+	++	++	0	+	0	+	+	0	+	0	0	+	+	+	++	+
Strategic Policy 37: Housing Provision	++	++/-	+	0	+/-	--?	--?	--?	--/+	--?	-	--?	++/-?	++/-	++/-	++/-	++/-
Strategic Policy 38: Meeting Local Housing Needs	++	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Policy 39: Affordable Housing	++/-?	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 40: Improving Housing Standards in the District	++	0	+	0	+	0	+	+	0	0	0	+	0	0	0	0	0
Policy 41: Rural Exception Homes	++	+/-	+	0	0	0	+/-	+/-	-	0	0	0	+/-	+/-	+/-	0	+/-
Policy 42: Retirement Housing and Specialist Care	++	+	++	0	+	0	0	0	0	0	0	0	+	+	+	0	0
Strategic Policy 43: Gypsy and Travellers ²	++	+/-	++	0	+/-	-?	--/+?	+/-?	+/-	--/+	+/-	+/-	+/-	+/-	+/-	0	--/+
Policy 44: Rural Workers' Accommodation	+	-	+	0	0	0	+	+	+	0	0	0	-	-	-	++	++
Policy 45: Replacement Dwellings and House Extensions in the Countryside	++	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 46: Ancillary Accommodation	+	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0
Strategic Site Allocations																	
Strategic Policy HA1: Strategic Development Principles	++	++?	+	0?	++/--?	--?	--?	--?	-	--?	-?	-?	++/-?	++/--?	+/-	++	++
Strategic Policy HA2: West of Crawley Area of Search and Land West of Ifield (Site SA101)	++	++?	+	0?	++/--?	++/--?	--/+?	--/+?	-	--?	+/-?	+/-?	++/-	++/--?	++/-?	++	++
Strategic Policy HA3: Land West of Southwater (Site SA119)	++	++?	+	0?	++/-?	--/+?	--/+?	--/+?	--?	--?	0	-?	++/-?	++/-?	++/-?	++	++/-?
Strategic Policy HA4: Land East of Billingshurst (Site SA118)	++	++/-?	+	0?	++/-?	--/+?	+/-?	--/+?	--?	--?	+/-?	-?	++/-?	++/-?	++/-?	++	++/-?

² Policy 20: Gypsy and Travellers proposes the allocation of sites for Gypsy and Traveller accommodation at the proposed strategic site allocations as well as at sites Southview, The Haven, Slinfold; Lane Top, Nutbourne Road, Pulborough; Hill Farm Lane and Stane Street, Pulborough; Northside Farm Rusper Road Ifield; Sussex Topiary Naldretts Lane Rudgwick; Plot 3 Bramblefield Crays Lane Thakeham; Girder Bridge, Gay Street Lane, North Heath. These seven sites were appraised as site options GA002; GA004; GA007; GA008; GA009; GA010; and GA015, respectively.

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Settlement Site Allocations																	
Strategic Policy HA5: Ashington (Site ASN1 – originally appraised as SA866)	++	+	0	0?	+	-?	--?	0?	-	--?	0	-	+	0	+	0	+
Strategic Policy HA6: Barns Green (Site BGR1 – originally appraised as SA006)	++	+	0	0?	+	-?	--?	--/++?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA6: Barns Green (Site BGR2 – originally appraised as SA510)	++	+	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA7: Broadbridge Heath (Site BRH1 – originally appraised as SA386)	++	++/-?	+	0?	+	-?	-?	--/++?	--?	--?	0	-	+	0	+	+	+
Strategic Policy HA7: Broadbridge Heath (Site BRH2 – originally appraised as SA622)	++	++	+	0?	+	-?	--/++?	0?	-	--?	0	-	+	0	+	+	+
Strategic Policy HA8: Cowfold (Site CW1 – originally appraised as SA076/SA083)	++	+	0	0?	++	0?	--/++?	--?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA8: Cowfold (Site CW2 – originally appraised as SA609)	++	+	0	0?	++	0?	--/++?	--?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA8: Cowfold (Site CW3 – originally appraised as SA610/SA611)	++	+	0	0?	++	0?	+/-?	--/++?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA9: Henfield (Site HNF1 – originally appraised as SA317)	++	++/-?	0	0?	+	--?	--/++?	--/++?	--?	--	0	-	+	0	+	0	-
Strategic Policy HA10: Horsham (Site HOR1 – originally appraised as SA074)	++	+++?	0	0?	+	--?	--/++?	-?	-	0	0	-	++	0	++	0	++
Strategic Policy HA10: Horsham (Site HOR2 – originally appraised as SA568)	++	++/-?	0	0?	+	0?	-?	0?	--?	--?	0	-	++	--	++	0	++
Strategic Policy HA11: Lower Beeding (Site LWB1 – originally appraised as SA567)	++	+	0	0?	+	-?	--/++?	+/-?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA11: Lower Beeding (Site LWB2 – originally appraised as SA584)	+	+	0	0?	+	-?	--?	--/++?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA12: Land North of the Rosary (West of Church Road)	++	+	0	0?	++	0?	-?	--?	--?	--?	0	-	+	0	+	0	+

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Strategic Policy HA12: Land North of the Rise Land at Dunstons Farm	++	+?	0	0?	++	--?	-?	--?	--?	--?	0	-	+	0	+	0	+
Strategic Policy HA13: Pulborough (Site PLB1 – originally appraised as SA556)	++	+++?	0	0?	++	--?	--/+?	-?	--?	--?	0	-	++	0	++	0	+
Strategic Policy HA14: Rudgwick and Bucks Green (Site RD1 – originally appraised as SA574)	++	+?	0	0?	++	-?	--/+?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA14: Rudgwick and Bucks Green (Site RD2 – originally appraised as SA794)	+	+?	0	0?	++	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA15: Rusper (Site RS1 – originally appraised as SA080)	++	+?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA15: Rusper (Site RS2 – originally appraised as SA872)	++	+?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA16: Small Dole (Site SMD1 – originally appraised as SA689)	++	--?	0	0?	+	--?	+/-?	0?	--?	--?	0	+/-	+	0	+	0	+
Strategic Policy HA17: Steyning (Site STE1 – originally appraised as SA742)	++	++	0	0?	++	--?	-?/+	--?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA18: Storrington Village (Site STO1 – originally appraised as SA361/SA732)	++	+++?	0	0?	++	--?	--/+?	--/+?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA18: Storrington Village (Site STO2 – originally appraised as SA384)	++	+++?	0	0?	++	--?	--/+?	+/-?	-	--?	0	-	+	--/+	+	0	+
Strategic Policy HA19: Thakeham (Site TH1 – originally appraised as SA039)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
Strategic Policy HA19: Thakeham (Site TH2 – originally appraised as SA873)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
Strategic Policy HA20: Warnham (Site WN1 – originally appraised as SA071)	++	+?	0	0?	+	0?	--/+?	0?	--?	--?	0	-	++	0	++	0	+

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Strategic Policy HA21: West Chilton and West Chilton Common (Site WCH1 – originally appraised as SA066)	++	+	0	0?	+	+	-	-/+?	--?	--?	0	-	+	0	+	0	-
Strategic Policy HA21: West Chilton and West Chilton Common (Site WCH2 – originally appraised as SA429)	++	+/-?	0	0?	-	+	-/+?	-?	--?	-?	-	-	-	0	-	0	+
Strategic Policy HA21: West Chilton and West Chilton Common (Site WCH3 – originally appraised as SA500)	+	+	0	0?	+	+	-/+?	+/-?	--?	--?	-	-	+	0	+	0	-

8.2 Changes made to the Cumulative Impacts since the draft LUC SA Appraisal in July 2021

8.5 The following paragraphs summarise cumulative impacts of the Local Plan. This explanation has also considered the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects.

Key to symbols and colour coding used in the SA framework

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

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

- 8.6 Policy 37: Housing Provision makes provision for the delivery of 13,212 homes (an average delivery rate of 777 homes per year). This falls short of the objectively assessed 'local housing need' as based on the Government's Standard Methodology (911 dwelling per annum). The limitations on housing provision placed on the Council by water neutrality mean that Horsham District is unable to deliver sufficient housing to meet its objectively assessed housing need.
- 8.7 In accordance with Policy 39: Affordable Housing, developments of 10 dwellings or more and those over 0.5 hectares in size are to be supported where they include an appropriate proportion of affordable homes. Thresholds for affordable housing are to be based on the outcomes of viability work and the threshold on the Land West of Ifield site has been increased from 35% to 40%. A mix of housing, including appropriate sizes and types, will also be provided in accordance with Policy 38: Meeting Local Housing Needs to meet the needs of the District's communities.
- 8.8 Overall, a **+ minor positive effect** is expected in relation to housing over the short, medium and long term. (This is reduced from cumulative significant positive effect in the draft Regulation 19 LUC SA Report).

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

- 8.9 The hierarchy set out through Policy 2: Development Hierarchy is likely to direct much of the growth over the plan period towards the built-up areas of the larger settlements in the plan area. Horsham town and the supporting small towns and villages provide access to the greatest number of services and facilities. Deletion of reference to the employment land at Buck Barn (due to the removal of the site as an allocation) and the restriction of non-town centre commercial uses to E(g) use classes under Strategic Policy 29 (which relates to offices, research and development businesses and light industrial purposes), may weaken slightly the positive effect recorded by LUC for SA2. However, this would only be on a very local scale (as non-office/industrial uses might provide local communities with more choice and better accessibility to other commercial services). The effect would also be countered by a strengthened positive effect relating to the accessibility to town centre areas particularly by sustainable travel meaning there was no change to the appraisal outputs.
- 8.10 An overall a ++ **significant positive and - minor negative effect** is expected in relation to access to services and facilities over the short, medium and long term.

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

- 8.11 The re-appraisal of Local Plan policies has seen a slight improvement in the overall assessment of this SA Objective as the removal of the Buck Barn allocation also removed the challenges of building a new settlement which had previously been recorded as having a potential negative impact on community cohesion. Overall, a ++ **significant positive** effect is expected in relation to SA3.

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

- 8.12 The re-appraisal of Local Plan policies has seen no change in the cumulative assessment of this SA Objective: an overall a + **minor positive effect** is expected in relation to crime and safety.

SA objective 5: To improve public health and wellbeing and reduce health inequalities

- 8.13 The introduction of a requirement in Strategic Policy 17 to refer to ‘Building for a Healthy Life design toolkit’ and a new requirement in Strategic Policy 20 for development to provide tree-lined streets and trees in open spaces is likely to have a significant positive impact on the health and wellbeing of the population, particularly in the medium and long term when the trees have established. In response to this a **+ minor positive effect** is expected in relation to health and wellbeing (increased from a minor positive effect).

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

- 8.14 There have been two changes to policy in the updated Local Plan that are likely to result in a significant positive effect on SA Objective 6. Firstly changes to Strategic Policy 17: Green Infrastructure and Biodiversity, now require new developments to increase their biodiversity net gain minimum target from 10% to 12%. Secondly the introduction of a new Water Neutrality Policy – Policy 9 aims at ensuring water levels in the Sussex North Water Resource Zone remain at a level that protects the integrity of sites of international nature conservation importance. Both of these policies are likely to have a positive effect against SA6, as is the reduction of housing numbers to be allocated through Policy 14.
- 8.15 That said, there is a relatively high amount of development proposed through the Local Plan and this is likely to have negative effects (prior to mitigation) in terms of designated biodiversity and geodiversity sites and the wider ecological networks in the District. This effect is also apparent as much of the development proposed through the plan is on greenfield sites (although it is recognised that brownfield sites can still harbour valuable biodiversity, and furthermore that intensively cultivated greenfield sites may have limited ecological value).
- 8.16 In relation to international biodiversity sites, the HRA for the Horsham Local Plan concluded that significant effects could not be ruled out on Arun Valley SPA/SAC/Ramsar sites (from changes in water quality, changes in water levels and flows and loss of functionally-linked land), Ebernoe Common SAC and The Mens SAC (from loss of functionally linked land) and, for The Mens SAC, atmospheric nitrogen deposition. An Appropriate Assessment was therefore carried out, which resulted in a number of recommendations being made over the course of the Plan’s preparation.

8.17 The Local Plan must not result in an adverse effect on the integrity of an internationally designated site either in combination or in isolation. The following recommendations (in summary form) were made in earlier iterations of Aecom's HRA Report by way of mitigation measures and alternative solutions required to ensure there are no adverse effects on these internationally designated sites arising from the Local Plan:

- A requirement introduced in Strategic Policy HA3: Land East of Billingshurst to devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emissions vehicles to ensure no adverse impacts on the Mens SAC arising from atmospheric nitrogen deposition.
- Policy measures to promote (and in later iterations to fully achieve) water neutrality in Horsham District (as detailed in Chapter 6 of this report), in relation to the Arun Valley SAC/SPA/RAMSAR.
- An additional clause added to Housing Policy STO1: Land to the North of Melton Drive, requiring the applicant to provide evidence that the development will not result in an adverse effect on the integrity of the Arun Valley SPA/RAMSAR. In summary, the policy now requires surveys to determine use of the site by qualifying species. Supporting text amended to clarify that proposals must not result in the loss of significant parcels of functionally linked land that supports Bewick's Swan, and qualifying bird assemblage features (shoveler, teal and widgeon) of the Arun Valley Ramsar and SPA.
- Supporting text of the Plan updated to include reference to the Sussex Bat Protocol and the requirement it sets out for development within 6.5km and 12km of both the Mens SAC and Ebernoe Common SAC. Within these zones, all development should adhere to the requirements set out in the Protocol. Also within these zones, proposals for development of greenfield sites must evaluate whether there is potential for the loss of suitable foraging habitat and/or the severance of commuting flightlines, and provide mitigation for any such loss.

Most of these changes were made at earlier stages of Plan preparation. However, those on complete water neutrality and land functionally linked to the Arun Valley SPA/RAMSAR have been introduced at this latest stage of Plan preparation and have therefore fed into changes to the appraisal outcomes.

8.18 Overall a **+ minor positive and -minor negative effect** is expected in relation to biodiversity and geodiversity over the short, medium and long term.

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

- 8.19 Whilst a new criterion has been added to Strategic Policy 20 for the inclusion of tree lined streets – which is likely to have a positive impact on landscape. The effects of new development on the landscape are to some extent uncertain until detailed proposals for the sites to be allocated come forward at the planning application stage and so the re-appraisal of Local Plan policies has seen no change in the overall assessment of this SA Objective: **A uncertain + minor positive and -- significant negative effect** is expected in relation to the landscape.

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

- 8.20 A change to the land allocation Policy STO1 Melton Drive has slightly strengthened protection for a local heritage asset located adjacent to the site. The change is unlikely to have a significant effect on the whole plan. As such the re-appraisal of Local Plan policies has seen no change in the overall assessment of this SA Objective: **an uncertain + minor positive and -- significant negative effect** is expected in relation to the historic environment.

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

- 8.21 The re-appraisal of Local Plan policies has seen no change in the overall assessment of this SA Objective: **a +minor positive and -- significant negative effect** is expected in relation to the efficient land use.

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

- 8.22 The introduction of new Water Neutrality Policy – Policy 9 is likely to have a minor positive effect against SA10 as it is designed ensure water levels in the Sussex North Water Resource Zone remain at a level that protects the integrity of sites of international nature conservation importance. This in turn protects other natural resources such as high-quality agricultural land through reduced development pressure and adequate water levels.

- 8.23 That said the re-appraisal of Local Plan policies has seen no change in the overall assessment of this SA Objective: a **cumulative + minor positive and -- significant negative effect** is expected in relation to the conservation of natural resources including minerals.

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

- 8.24 The relatively high level of development proposed set out through the Local Plan will inevitably result in an increase in demand for water abstraction and treatment. However, the introduction of new Water Neutrality Policy – Policy 9 will have a significant positive effect against SA11 as it will ensure water levels in the Sussex North Water Resource Zone remain at a level that protects the integrity of sites of international nature conservation importance. This in turn will protect water resources through reduced development pressure and adequate water levels.
- 8.25 The Gatwick Sub-Region Water Cycle Study reports that large-scale development by Billingshurst and by Crawley (most notably the sites allocated at West of Ifield and East of Billingshurst, as set out through Policies HA2 and HA4 respectively) could have implications with regard to capacity at existing wastewater treatment works (WwTW) infrastructure. Most of the development sites allocated for development do not lie within Source Protection Zones (SPZs) in the plan area. For the small sites the exception to this are a small number of sites at West Chiltington and at Thakeham.
- 8.26 Overall, a **+ minor positive and - minor negative** effect is expected in relation to water resources over the short, medium and long term.

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

- 8.27 The re-appraisal of Local Plan policies has seen no change in the overall assessment of this SA Objective: a **cumulative mixed + minor positive and - minor negative effect** is expected in relation to the efficient land use.

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

- 8.28 The reduction in the number of houses allocated through Policy 14 Housing will have a positive effect on SA13 (as shown in transport modelling evidence). However, as a positive effect was already scored for this policy, the re-appraisal of local Plan policies has seen no change in the overall assessment of SA13: a

cumulative ++ significant positive and - minor negative effect is expected in relation to transport.

SA objective 14: To limit air pollution in the District and ensure lasting improvements in air quality.

- 8.29 A clarification added to the criterion of Policy 12, requiring developers to mitigate air quality related impacts, as outlined in the Air Quality and Emissions Guidance for Sussex 2021, now clarifies that this requirement applies to both the construction and operation phases. This may have the effect of further improving air quality as it now explicitly includes the build phase.
- 8.30 Changes to Strategic Policy 24 Sustainable Transport to strengthen requirements relating to prioritisation of sustainable travel may also have the effect of improving air quality. However, as the previous appraisal already recorded a ‘++’ against SA14, there is no change to the appraisal outputs.
- 8.31 The reduction in the number of houses allocated through Policy 14 Housing will have a positive effect on SA13 given a lessened impact on air quality arising from less traffic overall.
- 8.32 Whilst these changes are positive, they are not so significant to justify a change in the appraisal outputs and so overall a + **minor positive and - minor negative effect** is still expected in relation to air quality over the short, medium and long term.

SA objective 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change

- 8.33 Strategic Policy 8: Sustainable Design and Construction has been updated to reflect the latest edition of the Building Regulations Part L, and the supporting text has been strengthened to clarify that new development is designed as net zero carbon in construction and operation, and also refers to further guidance on climate change being published in future to assist applicants in achieving the requirements set out in the Local Plan policies. However the overall effect on SA objectives SA15) is not altered, because the national changes to building regulations hold statutory weight and are therefore a more powerful tool than the Local Plan policy. The net effect is therefore similar to the July 2021 Cabinet version of the Local Plan appraised by LUC in 2021. As such there is no change to the appraisal outputs and overall a **significant ++ positive and - minor negative effect** is expected in relation to climate change over the short, medium and long term.

SA objective 16: To facilitate a sustainable and growing economy

- 8.34 The deletion of the allocation at Buck Barn and its employment provision is not considered to have a negative impact against SA16 as there is already shown to be significant surplus of supply against identified demand even without the benefit of the Buck Barn employment land.
- 8.35 Overall a ++ **significant positive effect** remains likely in relation to economic growth over the short, medium and long term.

SA objective 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District

- 8.36 The deletion of the allocation at Buck Barn and its employment provision is not considered to have a significant negative impact against SA17 as there will now be no housing built in the vicinity of what would have been the employment land.
- 8.37 Overall ++ **significant positive and - minor negative effect** remains likely in relation to economic growth over the short, medium and long term.

Temporary / Indirect Impacts

- 8.38 The main **temporary impacts** of the Local Plan are expected to be increased noise and disruption from construction traffic and the possible slowing down of housing construction in the initial stages of the plan period due to development lead-in times being longer due to water neutrality.
- 8.39 The main **indirect impacts** of the Local Plan are expected to be more housing due to an increase in development, which may lead to more traffic and the potential for worsening air pollution which could impact health. Development could have an indirect impact on health and well-being of the population through the introduction of more tree lined streets and areas for open space recreation.

8.3 Cumulative effects of the Local Plan with other plans

- 8.40 Development in Horsham District will not be delivered in isolation from those areas around it. The effect of delivering new development and supporting infrastructure will often be transmitted across administrative boundaries. In addition to this, future housing numbers and water efficiency standards have all been discussed

with neighbouring authorities under the Duty to Cooperate. As such it is important to consider the cumulative effects of delivering new development in Horsham with growth being proposed in neighbouring authority areas.

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

Crawley

- 8.42 To the northeast, Crawley Borough Council has adopted the Crawley Borough Local Plan 2015 – 2030 which makes provision for the development of a minimum of 5,100 net dwellings and an additional minimum of 35ha of land for business uses.
- 8.43 The adopted Local Plan 2015 – 2030 identifies and allocates key housing sites in the Borough. The most substantial of these is Forge Wood (1,900 dwellings) at the eastern Borough boundary and the Town Centre Key Opportunity Sites (499 net dwellings).
- 8.44 Crawley Borough Council is currently reviewing its local plan and is out to consultation on the Local Plan 2024 - 2040. This emerging Local Plan makes provision for 5,320 homes and once adopted will replace the Crawley Borough Local Plan 2015 – 2030.
- 8.45 The relatively small area covered by the Borough means that any development within Crawley would be in close proximity to Horsham District. Providing development in Horsham District close to the boundary with Crawley has the potential to contribute to unmet infrastructure (e.g. secondary school provision) and affordable housing needs in Crawley (subject to agreements on affordable housing nomination rights), and be in close proximity to jobs, services and facilities within Crawley, albeit such developments won't at this time contribute numerically to the total unmet housing need in Crawley. Development at Land West of Ifield (Policy HA2) may result in increased local congestion as well as increased higher levels of traffic within the Hazelwick AQMA. Opportunities to upgrade the main road network and improve bus travel and active travel (including a new Crawley Western Multi-modal Corridor) are likely to be supported by the allocation and development of the West of Ifield site, however, which could ultimately help mitigate increases in congestion.

Mole Valley

- 8.46 To the north, Mole Valley has prepared a new Local Plan – Future Mole Valley (Local Plan 2020-2037) which was submitted to the Secretary of State for examination in February 2022. The document sets out that at least 6,000 net additional homes are to be delivered over the plan period. The new Local Plan will replace the Core Strategy which plans for at least 3,760 new dwellings up to 2026) and the Mole Valley Local Plan 2000.
- 8.47 Much of the new development in Mole Valley is proposed to be allocated at sites located within, or on the edge of, the main built up areas of Leatherhead, Dorking, Ashted, Bookham and Fetcham which would provide between 5 and 550 dwellings. These settlements are located more than 10km from the Horsham District boundaries meaning the potential for in-combination effects is limited. The Draft Local Plan allocates land to significantly expand Hookwood (over 450 dwellings), which is within 5km of the Horsham District boundaries.

Waverley

- 8.48 To the north-west, Waverley Local Plan Part 1: Strategic Policies and Sites was adopted by the Council in February 2018. The Local Plan Part 1 sets out the spatial framework for delivering development which includes at least 11,210 net additional homes and 16,000 sq. m of new Use Classes B1a/b up to 2032. The Local Plan Part 2: Site Allocations and Development Management Policies was adopted in March 2023 and contains policies that direct planning application decisions and identify sites for housing development.
- 8.49 Strategic sites for development have been allocated through the Local Plan Part 1. Dunsfold Aerodrome New Settlement is allocated to provide 2,600 homes by 2032 as well as an expanded business park, while at Cranleigh sites are allocated to provide 250 new dwelling (Horsham Road) and 765 new dwellings (South of Elmbridge Road and the High Street) respectively. These allocations would be within 6km of the District boundary. The Dunsfold allocation is likely to present the greatest potential for increased travel, congestion and air pollution around the boundaries between these local authority areas. These effects are expected given the high level of development proposed and the delivery of new employment land which could also benefit residents in Horsham District.

Chichester

- 8.50 To the west, Chichester District Council has published the Chichester Local Plan Review 2021 – 2039 for consultation in February 2023, and the Plan is expected to have been submitted to the Secretary of State before the end of 2023. This document sets out the delivery of 10,350 new homes and at least 19.5ha of employment floorspace in B use classes up to 2039. The Site Allocation Development Plan Document 2014-2029 for Chichester District sets out to deliver non-strategic residential and employment sites in the District.
- 8.51 The Local Plan Review supports the retention of the rural character of existing villages and sets the requirement for approximately 270 new dwellings to come forward in the city centre as well as other larger developments around the District. The development most notable to Horsham is the development in Loxwood which is to develop its role as a larger village delivering 220 new homes between 2021 and 2039, with 75 new homes provided at Wisborough Green during the same period. Given the limited potential for development in the area of Chichester which adjoins Horsham District, and in light of Duty to Cooperate discussions between Horsham and Chichester Councils, it is considered unlikely that significant in-combination effects could result.
- 8.52 One potential cumulative impact is regarding nitrogen deposition at The Mens SAC as a result of increased traffic on the A272. This will continue to be addressed through the respective Habitat Regulations Assessments and Duty to Cooperate work, however evidence from the Horsham HRA appropriate assessment is that there will be no adverse effect on the integrity of The Mens SAC either alone, or in combination with other plans or projects in relation to nitrogen deposition.
- 8.53 A further potential cumulative impact is combined pressure on secondary education places. Evidence to date, as reflected in advice to Chichester from West Sussex County Council, is that this impact can be mitigated. Furthermore, a new secondary school is expected to be delivered in Horsham District as part of the North-west of Southwater strategic allocation to address existing and future needs.

Arun

- 8.54 To the southwest the Arun Local Plan 2011 - 2031 was adopted in July 2018. The Local Plan sets out a housing requirement of 20,000 new homes as well as a requirement for 74.5 ha of land to be allocated for employment up to 2031 in the District.

- 8.55 The land covered by Arun District is separated from the Horsham District by the boundaries of the South Downs National Park. Land within Arun District is located within 8.5km of Horsham District at its closest point. Strategic housing allocation sites within Angmering are to deliver 800 homes and 200 homes to the north and south of the village. Commuting flows see more commuters travel to Horsham from Arun than in the opposite direction. Given the limited access through the South Downs National Park, which is provided by the route of the A24, there is some potential for increased congestion and air pollution to result along this route. This is being addressed through the Horsham Transport Study.

Adur

- 8.56 To the southeast Adur Council adopted Adur Local Plan 2017 in December 2017 which sets out a housing delivery target of 3,718 homes for the period 2011 to 2032. During this period of time 41,000 square metres of land are allocated for appropriate employment uses in the District.
- 8.57 The land which falls within Adur District is separated from the Horsham District by the boundaries of the South Downs National Park. However, land within the built-up area of Adur is within 5km of the Horsham District boundary at its closest point. Within Adur District 1,538 new homes are to be provided within the built-up area of Adur. 1,100 new homes are to be provided as part of the Shoreham Harbour Regeneration Area Western Arm, 600 new homes at New Monks Farm and 480 new homes at West Sompting.
- 8.58 Only a small amount of development is set out within the area of Adur which is within closest proximity to the southern portion of Horsham District. A site is allocated as part of the Horsham Local Plan Review at Steyning for 265 homes on land around the A283 which provides important access though the South Downs National Park to Adur. As such further congestion and air pollution along this route may result, particularly considering that it is currently noted to suffer from some level of congestion during peak periods. This is being addressed through the Horsham Transport Study.

Mid Sussex

- 8.59 To the east Mid Sussex District Council adopted Mid Sussex District Plan 2014 – 2031 in March 2018 which sets out a minimum housing requirement of 16,390 homes. The Plan is also supportive of the delivery of an average of 543 jobs per year over the plan period. Mid Sussex District Council is also currently undertaking work on the

Mid Sussex Local Plan Review 2021-2039 for which the Regulation 18 consultation was undertaken from November 2022 until December 2022, with Regulation 19 publication expected in January 2024. The draft Local Plan Review supports the delivery of 6,757 new homes.

- 8.60 Much of the land allocated in the Mid Sussex District Plan to meet the development needs of the plan period lies in the eastern portion of the District in areas (such as Burgess Hill, East Grinstead, Hassocks, Copthorne, Crawley Down Scaynes Hill and Lindfield) which are not in close proximity to Horsham District. Hurstpierpoint and Pease Pottage are required to provide 359 new homes and 929 new homes respectively, up to 2031. The draft Local Plan Review is looking to allocate at least 2,000 homes around the settlement of Sayers Common, and another 200 homes at Bolney, both settlements within 2km of the border with Horsham District. These allocations have a potential to impact on congestion on the A272 and the Cowfold AQMA.

Brighton and Hove

- 8.61 To the southeast Brighton and Hove City Council adopted the Brighton and Hove City Plan Part One in March 2016. The policies in that document replace several policies in the adopted Brighton and Hove Local Plan (2005). Delivery of 13,200 new homes is to be achieved during the plan period 2010 to 2030. City Plan Part Two was adopted in October 2022 and allocates additional development sites and sets out a detailed development management policy framework to support the implementation of the Part One Plan.
- 8.62 The largest site allocations set out in the plan area are at:
- Brighton Marina (1,940 homes and 2,000 sqm of new employment floorspace);
 - The New England Quarter and London Road Area (1,130 homes and 20,000 sqm of new employment floorspace);
 - The Lewes Road Area (875 homes and 15,600 sqm of new employment floorspace);
 - The Toad's Hole Valley (700 homes and 25,000 sqm of new employment floorspace); and
 - The Eastern Road and Edward Street are (515 new homes and 18,200 – 23,200 sqm of new employment floorspace).
- 8.63 Of these site allocations the Toad's Hole Valley Area is nearest – within 4.1km - to the Horsham District Local Plan area. This site lies within the City's built-up area boundary contained by the A27 but would involve a large amount of greenfield land take in an area which is in close proximity to the South Downs National Park.

Considering the distance between the sites in the Brighton and Hove City area and Horsham District the potential for in-combination effects on the character of Horsham District and the South Downs National Park (given that areas of the National Park lie between the Brighton and Hove and Horsham District) are likely to be limited. Furthermore, allocations in the Horsham District Local Plan do not include any large sites towards the boundary of the National Park. Only non-strategic sites are being considered for allocation towards the southeast of Horsham District, which is in closest proximity to Brighton and Hove. These are at the settlements of Steyning and Small Dole.

- 8.64 The inclusion of new employment land in Brighton and Hove is likely to see the area remain an important commuting location for residents in Horsham District, particularly for those in the southern part of the District. While much of Brighton and Hove benefits from access to railway stations and a well-developed bus network, residents in the south and southeast of the Horsham do not benefit from easy access to such services. The potential to make use of more sustainable modes of transport to access new employment opportunities may therefore be limited. Much of Brighton and Hove is covered by the Brighton and Hove AQMA as well as smaller AQMAs at Shoreham and Southwick. The new employment opportunities provided in the south of the City area (including at the Brighton Marina and Eastern Road and Edward Street allocation sites) could see increased volumes of traffic within these AQMAs. As such, there is potential for existing air quality issues to be intensified within the AQMAs in the City.

South Downs National Park

- 8.65 The South Downs National Park Authority adopted the South Downs Local Plan in July 2019 and this provides planning policy for the land within the National Park. It covers the period 2014 to 2033 and sets a housing provision target of approximately 4,750 net additional homes. During this period of time the Local Plan makes provision for land for offices (5.3ha) industrial development (1.8ha) and small-scale warehouses (3.2ha). The adopted Local Plan replaces the previously saved policies for the National Park in the Adur District Local Plan (1996), Arun District Local Plan (2003), Chichester District Local Plan First Review (1999), Mid Sussex Local Plan (2004) and Horsham Core Strategy (2007).
- 8.66 Only a limited amount of development is required over the plan period in the areas around Horsham District. Petworth is located approximately 6km from the District boundary and is accessible along the A272 from Billingshurst. A moderate number of new homes (150) is to be provided at this settlement over the plan period. Shoreham Cement Works which is located to the south of Upper Beeding within 2km along the

A283, is allocated for mixed use development with tourism, recreation, and employment as well as residential use subordinate to the overall mix of use supported at this location. The site is currently identified as comprising unsightly uses which may detract from the character of the National Park.

- 8.67 As such, it is expected that this allocation could help enhance the local landscape as well as providing employment uses for the residents in the south of the District. It may, however, result in increased traffic along the A283 at which congestion can be occur at peak travel times. Associated effects relating to air quality may also result at this location if vehicle numbers along the A283 were to increase.

8.4 Mitigation

- 8.68 The Local Plan would deliver a relatively high level of development over the plan period. As this chapter describes, this level of development may lead to several potentially negative impacts that have been identified in the previous chapter. The SEA Regulations advocate that negative effects should be addressed in line with the mitigation hierarchy: avoid effects where possible, reduce the extent or magnitude of effects, then seek to mitigate any remaining effects. Where possible, the positive impacts of a plan should also be enhanced.
- 8.69 Table 8.2 summarises the policies in the Local Plan that are expected to avoid, reduce, and mitigate the potentially negative effects of delivering the Local Plan in relation to each of the SA objectives.

Table 8.2 Local Plan policies that would contribute to the mitigation of negative effects and/or enhancement of positive effects

SA Objective	Mitigation provided by Local Plan policies
SA1: Housing	<p>Strategic Policy 37: Housing Provision requires the delivery of a significant number of homes which would meet the objectively assessed need for the District and contribute to housing need in the surrounding local authority areas.</p> <p>Strategic Policy 38: Meeting Local Housing Needs, Policy 39: Affordable Housing, and Policy 40: Improving Housing Standards in the District require that the housing stock delivered includes a viable proportion of affordable homes, a mix of housing sizes and types to meet the needs of the District's communities and is of a high standard including meeting requirements for internal floor areas and storage space.</p>
SA2: Access to services and facilities	<p>Strategic Policies 2: Development Hierarchy and 35: Town Centre Hierarchy and Sequential Approach support the development hierarchy in the District and a town centre led approach to development which is likely to ensure a high number of residents have access to services and facilities at these locations.</p> <p>Strategic Policy 23: Infrastructure Provision and Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District. Policy 40 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p> <p>Specific to strategic scale development, Strategic Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver</p>

SA Objective	Mitigation provided by Local Plan policies
	the necessary services and facilities that contribute to the development of a successful community.
SA3: Inclusive Communities	<p>Strategic Policies 2: Development Hierarchy and 35: Town Centre Hierarchy and Sequential Approach support the development hierarchy in the District and a town centre lead approach to development which is likely to ensure a high number of residents have access to services and facilities at these locations.</p> <p>Strategic Policy 20: An additional criterion has been added since the July 2021 Cabinet version of the Local Plan to ensure development design is attractive and inclusive, meeting the needs of all users – with particular consideration given to disability age, gender and those with caring responsibilities.</p> <p>Policy 25 requires that cycle parking ‘must be conveniently located’ for users, and that plug-in charging facilities should be provided for electric cycles and mobility scooters</p> <p>Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for the delivery of development to create socially inclusive and adaptable communities.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA4: Crime	<p>Strategic Policy 19: Development Quality requires that development is provided to functional, accessible, safe and adaptable environments in Horsham District.</p> <p>Strategic Policy 20: Development Principles sets out the development principles for the District and includes a requirement for development to include measures to reduce actual or perceived opportunities for crime or antisocial behaviour.</p>
SA5: Health and wellbeing	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development and patterns of development which would help to encourage travel by walking and cycling, which could result in increased levels of physical activities among residents.</p> <p>Strategic Policy 23: Infrastructure Provision and Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District. Policy 40 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p> <p>Strategic Policy 27: Inclusive Communities, Health and Wellbeing directly addresses the delivery of development in Horsham to support healthy lifestyles and address health and wellbeing including the protection and enhancement of existing community facilities, services and open spaces.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Strategic Policies HA2 HA3 and HA4 specify that the West of Ifield, North West of Southwater and East of Billingshurst developments includes a range of informal open space provision.</p>
SA6: Biodiversity and geodiversity	<p>Strategic Policy 13: The Natural Environment and Landscape Character protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p> <p>Strategic Policy 17: Green Infrastructure and Biodiversity requires that designated sites and habitats are appropriately considered as part of the development process and a minimum of 12% biodiversity net gain is achieved at development sites. Furthermore, development should maintain and enhance green infrastructure, the Nature Recovery Network and natural capital. There is also an additional requirement added since the July 2021 Cabinet version of the Local Plan, that Green Infrastructure should be integral to the design and layout of new development and that new linkages should consider Natural England’s Green Infrastructure Guidance and the Councils Green Infrastructure strategy. A new requirement for an appropriate buffer around woodland has also been added.</p>
SA7: Landscape	<p>Strategic Policy 13: The Natural Environment and Landscape Character protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Strategic Policies 14: Countryside Protection and 15: Settlement Coalescence limit the potential for development to encroach on the open countryside and the special character of this area as well as the potential for settlement coalescence.</p> <p>Strategic Policy 16: Protected Landscapes requires development to be respectful of the setting of protected landscapes, including the High Weald AONB and the adjoining South Downs National Park.</p> <p>Strategic Policies 19: Development Quality and 20: Development Principles set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p>
SA8: Historic environment	<p>Strategic Policies 19: Development Quality and 20: Development Principles set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p> <p>Policy 21: Heritage Assets and Managing change in the Historic Environment is set out to ensure the positive management of development affecting heritage assets, by requiring development to be considerate of the significance of heritage assets and to make a positive contribution to the character and distinctiveness of the area.</p>
SA9: Efficient land use	<p>Strategic Policy 2: Development Hierarchy sets out that development is to be permitted within the built-up area boundaries of settlements in the plan area, including on any suitable previously developed land.</p> <p>Strategic Policy 11: Environmental Protection states that development proposals should address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation.</p> <p>Strategic Policy 20: Development Principles set out that development should make efficient use of land and prioritise the use of previously developed land.</p>
SA10: Natural resources	<p>Strategic Policy 6: Climate Change is supportive of development which includes measures to help reduce the amount of biodegradable waste sent to landfill and promotes grey water recycling.</p> <p>Strategic Policy 8: Sustainable Design and Construction requires development to incorporate measures to minimise construction and demolition waste and utilise recycled and to support grey water recycling.</p> <p>Strategic Policy 9: Water Neutrality requires development to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development.</p> <p>Strategic Policy 14: Countryside Protection is supportive of development in the countryside which would enable the extraction of minerals or the disposal of waste.</p>
SA11: Water resources	<p>Strategic Policy 6: Climate Change is supportive of development which includes measures to support the conservation of water supplies.</p> <p>Strategic Policy 9: Water Neutrality requires development to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development.</p> <p>Strategic Policy 10: Flooding requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS.</p> <p>Strategic Policy 11: Environmental Protection requires development to maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies.</p> <p>Strategic Policy 17: Green Infrastructure and Biodiversity is supportive of development which would maintain and enhance the green infrastructure network as well as existing freshwater features.</p> <p>Strategic Policy 23: Infrastructure Provision requires that the release of land for development is to be dependent upon sufficient capacity in the existing local infrastructure (including infrastructure relating to water supplies) to meet the additional requirements.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that proposals of this nature should deliver necessary new infrastructure to support the new development, including provision of utilities, water supplies and wastewater treatment.</p>
SA12: Flooding	<p>Strategic Policy 10: Flooding requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS. Development proposals are only to be supported where they follow a sequential approach to flood risk management.</p> <p>Strategic Policy 13: The Natural Environment and Landscape Character requires development to incorporate and maintain SUDS in an optimal location for their purpose whilst also securing landscape enhancements and high-quality green spaces.</p> <p>Strategic Policies 17: Green Infrastructure and Biodiversity and 6: Climate Change are supportive of development which would maintain and enhance the green infrastructure network.</p>
SA13: Transport	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Strategic Policy 19 now has an additional criterion added to encourage low traffic neighbourhoods with good street design that prioritises pedestrians and cyclists.</p> <p>Strategic Policy 24 requires development prioritise sustainable travel.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA14: Air quality	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Strategic Policy 11: Environmental Protection requires new development proposals to ensure that resultant air pollution is minimised and that they contribute to the implementation of Air Quality Action Plans.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA15: Climate change	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport. Strategic Policy 6 also supports developments which contribute to achieving net zero carbon emission, by helping to encourage behaviours that reduce energy use and promoting the use of decentralised, renewable and low carbon energy supply systems.</p> <p>Strategic Policy 7: Appropriate Energy Use requires new development to contribute clean, efficient energy in the District. New developments must also demonstrate how they will provide zero and low carbon heating. Stand-alone renewable energy schemes are also supported by the policy. The policy now includes a new criterion to 'Be Seen' which will ensure energy performance is monitored, verified, and reported.</p> <p>Strategic Policy 11: Environmental Protection requires new development proposals to ensure that resultant greenhouse gas emissions are minimised.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also contribute to the achievement of zero carbon and be designed to minimise the need to travel by car.</p>
SA16: Economic growth	<p>Strategic Policy 26: Gatwick Airport Safeguarding safeguards land for the expansion of Gatwick Airport, which is identified to be of importance for District and the wider economy in the Gatwick Diamond.</p> <p>Strategic Policies 29: New Employment and 30: Enhancing Existing Employment support sustainable economic growth in the District up to 2040 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p> <p>Policy 31: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Policy 33: Equestrian Development and Strategic Policy 34: Tourism Facilities and Visitor support economic growth in equestrian and tourism which are important for rural locations.</p>
SA17: Access to employment opportunities	<p>Strategic Policies 29: New Employment and 30: Enhancing Existing Employment support sustainable economic growth in the District up to 2040 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p> <p>Policy 31: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to provide new employment land to meet the principle of one new job per home.</p>

9.0 Monitoring

9.1 The SEA Regulations require monitoring to be undertaken in relation to the significant effects of implementing a Plan. The suggested indicators for monitoring the potential significant sustainability effects of implementing the Local Plan are set out in Table 9.1. This draws from the proposed monitoring framework in the Local Plan and only proposes indicators against the SA objectives for which likely or uncertain significant effects (positive or negative) were identified.

Table 9.1: Indicators for monitoring the potential significant sustainability effects of implementing the Local Plan

SA objectives	Proposed Monitoring Indicators
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	Housing completions Average house prices Agreement on Water Neutrality Implementation Scheme Affordable housing schemes granted permission, and affordable housing as % of all housing granted permission Number of permitted pitches for Gypsies and Travellers and Travelling Showpeople
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	Total revenue from CIL contributions Total revenue from S106
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	Indices of Multiple Deprivation
SA 5: To improve public health and wellbeing and reduce health inequalities.	Index of Multiple Deprivation re. health
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	SSSI condition Integrity of SACs/SPAs Agreement on Water Neutrality Implementation Scheme
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	Number of buildings on Local List
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	Gross amount of employment floorspace completed on Previously Developed Land (PDL) Gross housing completions on PDL, and % of new housing on PDL

SA objectives	Proposed Monitoring Indicators
SA 10: To conserve natural resources, including mineral resources in the District.	District recycling rates
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	No. existing homes with flow restrictors fitted No. schools with water efficiency retrofits River quality
SA 12: To manage and reduce the risk of flooding.	Planning permissions granted contrary to advice of EA on flooding and water quality grounds
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	Proportion of households with two or more cars Travel to work data (mode and distance)
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	Number of AQMAs in District and any changes in their area Proportion of households with two or more cars Travel to work data (mode and distance)
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	Number of District Heating networks in District Total emissions of CO ₂ Carbon emissions per capita Carbon emissions by sector (Industrial & Commercial, Domestic and Road) and per capita
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	Net amount of land developed for employment land / land supply by type (B1 / B2 / B8), particularly in strategic locations Amount of employment land lost to residential development Levels of Unemployment

10.0 Conclusions and Next Steps

- 10.1 This document has considered the sustainability implications of the policies and sites presented in the draft Regulation 19 Horsham Local Plan. This document updates the Policy and Site Appraisals previously undertaken by LUC in 2021 where changes to policies, large and small sites have taken place.
- 10.2 The document introduces the issue of water neutrality, explains how the authorities in the Water Resource Zone have been working together to address it and appraises a new Local Plan Policy that has been drafted to address the issue. The document also identifies two reasonable alternative water efficiency policy options together with some small site options that had not previously been identified.
- 10.3 The plan area is predominantly rural in character with areas of higher value landscapes, including those relating to the High Weald AONB and the setting of the South Downs National Park. The services and facilities within the District are mostly accessible in the main town of Horsham and the smaller towns and larger villages such as Southwater, Billingshurst, Storrington, Henfield, Steyning and Broadbridge Heath. The highest job provision in the plan area is also provided in Horsham town. The District also has a strong relationship with Crawley and the wider Gatwick Diamond as well as to a lesser extent London and the southern coastal authorities. In all around 40% of the District's residents commute to locations outside of the District. Crawley in particular is important for jobs, services and facilities for residents of Horsham in the north of the District.
- 10.4 The affordability of housing in the plan area is a key issue. The median house price in Horsham District is around 13 times higher than average annual earnings. The District falls within two main housing market areas. The majority of the District falls within the North West Sussex Housing Market Area (HMA), and a small area to the south east falls within the Sussex Coast HMA.
- 10.5 The District benefits from numerous nationally designated biodiversity sites with more sizeable designations present at St. Leonard's Forest Site of Special Scientific Interest (SSSI) to the east of Horsham town, Warnham SSSI to the south of Kingsfold and Sullington Warren and Chantry Mill to the south east of Storrington. Areas to the south west of the District within the National Park fall within the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The District also has functional links to the Mens SAC which is beyond its western boundary for which a bat sustenance zone has been declared in Horsham District. This includes much of the land in the area to the west of the settlements of Horsham, Southwater and Ashington.

- 10.6 The implications of climate change will add uncertainty for development over the plan period given the increase in extreme weather events.
- 10.7 The Local Plan sets out a strategy for growth in the District up to 2040. The Local Plan provides for the delivery of an average delivery rate of 777 net additional homes per annum over the plan period (which for the first 5 years takes account of the need for a 10% uplift or 'buffer'). This level of housing growth will contribute positively to the step change in housing growth as required by Government, however the issue of Water Neutrality will limit housing delivery to a level below the Government's Standard Housing Method of calculating a housing requirement, and there will no longer be capacity to address the housing needs of neighbouring authorities.
- 10.8 The Local Plan supports the long-term economic growth of the District, setting out new sites to meet the anticipated need for employment land. Sites are also allocated for Gypsy and Traveller accommodation. An 13,212 over the plan period represents a significant increasing in the housing stock of Horsham to be delivered within 17 years. This scale of growth will inevitably have implications in terms of the natural and built environments, including biodiversity, landscape and heritage assets. There are also likely to be implications in terms of air quality. This issue is of particular importance when considered in relation to the Air Quality Management Areas (AQMAs) within the District (Storrington and Cowfold AQMAs) and in neighbouring Crawley (Hazelwick AQMA) where further development at Ifield could result in intensification of existing air pollution.
- 10.9 The SA has tested a number of options for distributing growth (i.e., the growth scenario options) in the plan area. From the options testing and the consideration of other evidence, the preferred option identified represents a balanced approach which includes urban extension sites as well as small sites broadly in line with the development hierarchy. This approach would make good use of the existing services and facilities, employment opportunities and sustainable transport links in the plan area while also allowing for a more limited level of growth at the smaller settlements to provide support for their services and meet localised needs.
- 10.10 The high level of growth set out at urban extension sites is of a scale to support substantial new service provision in the plan area. The larger scale urban extensions selected for inclusion in the Local Plan by the Council were supported by the findings of the SA. Furthermore, by including development as an urban extension to the West of Crawley, the Local Plan responds positively to economic realities of the area and interrelationship between the two authorities. While the strategy does not include a new large scale urban extension site at Horsham town, it includes the densification of the existing North Horsham allocation and a number of small site allocations at that settlement which would make good use of the high number of services and facilities and jobs here.

- 10.11 Through this approach the Local Plan provides an opportunity to reduce the reliance on the private vehicle and support access to services and facilities which benefit public health. By including much of the new growth at urban extension sites at larger settlements there is greater opportunity to integrate with existing community networks.
- 10.12 The strategy could have implications in terms of landscape character given that some of the land taken forward was identified through the landscape capacity work as having no/low or low-moderate capacity for development. Furthermore, many of the sites were identified as likely to have significant impacts in relation to historic assets or archaeology, prior to mitigation.
- 10.13 The overall level and distribution of development will result in increased noise, air and light pollution which could affect designated biodiversity sites as well as other important habitats in the District. The distribution of development would result in development within the bat sustenance zone associated with the Mens SAC to the west of the District. Furthermore, the development of smaller scale sites to the southwest of the District have the potential to have adverse impacts (in addition to those relating to water abstraction) on the Arun Valley sites, including the SPA.
- 10.14 In relation to the international sites, water abstraction in the Arun Valley has the potential to have an adverse impact on internationally designated habitats, and so a new water neutrality policy has been included in the revised Local Plan. The number of housing units to be delivered throughout the plan period has also been reduced to help limit this impact.
- 10.15 The HRA for the Horsham Local Plan identified that significant effects on the Arun Valley SPA/SAC/Ramsar sites could not be ruled out. Changes in water quality, changes in water levels and flows and loss of functionally linked land may occur without appropriate mitigation. Similarly, significant effects on Ebernoe Common SAC and The Mens SAC (from loss of functionally linked land) and on The Mens SAC (atmospheric nitrogen deposition) could not be ruled out. An Appropriate Assessment was therefore carried out, which resulted in several recommendations being made to ensure that the Local Plan does not result in an adverse effect on the integrity of any internationally designated site either in combination or in isolation.
- 10.16 Through the testing of the site options, the SA reported that many of the sites at the Main Town (Horsham) or a Small Town or Larger Village in the District performed more favourably in relation to both access to services and facilities and health and wellbeing. This is particularly the case for sites at Billingshurst, Henfield, Pulborough and Codmore Hill, Steyning and Storrington. These larger settlements provide access to a range of services and facilities including healthcare. The larger settlement of Southwater would also provide new residents with generally good access to services

and facilities, such as retail and community facilities. However, the distribution of site options considered in relation to the existing education and healthcare facilities at this settlement means that residents would have more limited access to these specific types of facilities. The smaller settlements of Rudgwick and Bucks Green, Cowfold and Partridge Green benefit from healthcare facilities but their smaller size means the range of services and facilities accessible at these locations is more limited.

- 10.17 Particular benefits in relation to transport and climate change were noted where sites are close to settlements which provide access to a railway station. In Horsham District, stations are located at Billingshurst, Christ's Hospital, Horsham town, Pulborough, Warnham and Faygate. The strategy taken forward in the Regulation 19 Local Plan includes sites which are well related to rail stations with regular services. This approach may help to limit the need to travel by car in the plan area and have benefits in terms of reduced congestion and carbon emissions as well as improved air quality. Conversely, the strategy also includes sites at settlements (Cowfold and Storrington) which contain or are functionally linked to an AQMA which may result in adverse impacts in relation to air quality.
- 10.18 The Local Plan includes a number of topic-based policies as well as site specific policy requirements which are likely to help mitigate the potential for many of the adverse effects described above. These include the requirement for development to achieve at least 12% biodiversity net gain and to incorporate measures which contribute to achieving net zero carbon emissions across the District by 2050. These measures will help to ensure the protection and enhancement of biodiversity sites and habitats in the plan area, as well as the limitation of greenhouse gases in the longer term. Policies are also included to protect local air quality, prevent increases in flood risk and preserve the historic environment and landscape character. This includes limiting the potential for settlement coalescence and preserving the open countryside as well as the setting of the High Weald AONB and South Downs National Park to reflect the relevant management plans and the South Downs Local Plan.
- 10.19 In considering the cumulative effects of all of the Local Plan's policies and site allocations together, the SA found that significant positive effects are likely with respect to; SA objective 2: Access to services and facilities, SA objective 3: Inclusive communities, SA Objective 13: Transport, SA objective 15: Climate change, SA objective 16: economic growth and SA objective 17: access to employment opportunities.
- 10.20 Overall significant negative effects for the Local Plan were identified for SA objective 7: landscape, SA objective 8: historic environment, 9: soil quality and 10: mineral resources. However, in all cases these effects are expected to be combined with

positive effects, including those arising from policy requirements aimed at mitigating the negative effects identified.

- 10.21 In summary, the Local Plan sets out an approach to accommodate a relatively high level of development in a predominantly rural District. The policies of the Local Plan will help to address housing affordability in the area as well as contributing to the unmet need of the neighbouring authorities. The delivery of sustainable development over the plan period will be challenged by the lack of existing service provision in some areas and the existing pattern of out commuting, however the local plan's policies aim to address these issues and improve on the current situation.
- 10.22 The impacts which new development will have in terms of the District's landscape character, the integrity of its biodiversity assets, water resources and historic environment will also pose challenges. Given that most new development will take place on greenfield land, there will inevitably result in a loss of some agricultural soils. The sensitivities of the area mean that some of the significant negative effects will be difficult to avoid, but the policy safeguards set out in the Local Plan will mean that many of the adverse effects are only likely to be minor. Taken as a whole, therefore, the Local Plan sets out a positive approach to achieving sustainable development which will help to meet the needs of the local community up to 2040.

Next steps

- 10.23 This Updated SA Report will be available for a six-week period of representations alongside the Regulation 19 Horsham District Local Plan from 19 January to 1 March 2024.
- 10.24 Following this, the Local Plan and an accompanying updated SA Report will be submitted to the Secretary of State for public examination. Any proposed modifications to the Submission version of the Local Plan arising out of this process may require further appraisal in the SA, which will be consulted upon, as necessary.

Appendix A: Updated Baseline Information 2022

- A.1 The following information presents an update to the Baseline Information presented in the SA Scoping Report undertaken by LUC in 2021. This council felt that this update was required to take account of any factual changes to information and additional sustainability issues such as water neutrality which may impact the development of policies within the Horsham District Local Plan. This update was undertaken in August 2022.

Current Baseline

Population

- A.2 Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification³. Population density in the District is 2.77 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 4.43 persons per hectare⁴.
- A.3 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 cooking facilities and share a living room, sitting room or dining area⁵.
- A.4 Many of the settlements in Horsham have experienced increasing populations in recent years. This is particularly the case at Southwater and Billingshurst, given that these settlements have seen several housing developments in past years⁶.
- A.5 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.

³ 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

⁴ Office for National Statistics (2022) Census 2021: How the population changed in Horsham [Online] Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000227/>

⁵ Office for National Statistics (2022) Families and household statistics explained [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/articles/familiesandhouseholdstatisticsexplained/2021-03-02>

⁶ Horsham District Council (2019) Northern West Sussex Strategic Market Housing Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf

- A.6 The population of Horsham in the 2021 Census was 146,800 across 62,400 households⁷ compared to the 2011 Census, when 131,300 people lived in the District, across 54,900 households⁸. The resident population has an older age profile compared with England, with 17% aged 0 to 14 years (England, 17%) and 23% aged 65 and over years (England, 18%)⁹. It is reported that of those residents over 65 years of age, 7,500 live alone and are therefore at greater risk of loneliness¹⁰. 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%¹¹ to 5.9% from 2001 to 2021. A similar trend has been experienced in West Sussex and in the South East in general. As of 2011, the average age in Horsham is 42.1, which is higher than the average for England as a whole which is 39.3¹². 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.¹³
- A.7 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.

Housing

- A.8 In the last five years, Horsham District Council (2016/17 to 2020/2021) 5,013 homes have been delivered in the district. Overall this is in excess of the 800 homes per year target set out in the HDPF. Horsham has a relatively high number (89%) of residents living in private housing as opposed to public housing. This proportion is greater than the national average of 83%. 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 11.4% of the housing tenure in Horsham is currently socially rented, compared to 16.8% in West Sussex¹⁴.

⁷ <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000227/>

⁸ Office for National Statistics (2022) Census 2021: How the population changed in Horsham [Online] Available at:

<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000227/>

⁹ Office for National Statistics (2022) Census 2021: How the population changed in Horsham [Online] Available at:

<https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000227/>

¹⁰ West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

¹¹ 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

¹² Horsham District Census Demographics (2011) [Online] Available at: <http://localstats.co.uk/census-demographics/england/south-east/horsham>

¹⁴ Horsham District Council (2019) Northern West Sussex Strategic Market Housing Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf

¹⁴ Horsham District Council (2019) Northern West Sussex Strategic Market Housing Assessment [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Assessment.pdf

House prices are higher in Horsham compared to the West Sussex average and the national average, as presented in **Table 3.1**. In 2018, of the 2,370 properties sold in Horsham only 1 in 4 was less than £300,000¹⁵. 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 District¹⁶.

Table 0.1 Comparison of average house prices in Horsham, West Sussex, South East and the UK for 2021¹⁷

Location	Horsham	West Sussex	South East	England
Average Property Value	£402,947	£370,000	£384,428	£270,973

A.9 Horsham saw a 9% increase in house prices for the period of 2020 to 2021, which is below the 14% average increase in England. In 2014, 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%)¹⁸. Furthermore, the property price to earnings ratio in Horsham District has increased threefold in the twenty year period ending in 2021. In 1998 the property price to earnings ratio in the District was 4.8 compared to 9.7 in 2008 and 13.9 in 2021. The 2021 property price to earnings ratio for Horsham was significantly higher than the average for England and Wales. Full-time workers for England could expect to pay an estimated 9.1 times their annual workplace-based earnings on purchasing a home¹⁹.

A.10 The predominant house size in Horsham is three bedrooms and these types of properties account for 37% of total stock. There are also significant levels of two and four bedroom sized properties in the District (24% and 21% respectively). Houses with five bedrooms or more account for 7% of total stock. The 50 to 64 age group is the largest proportion of owner-occupiers, followed closely by those aged 35 to 49 and those over 64 years of age. In total these age groups make-up almost two thirds of the owner-occupier market in Horsham where 3 and 4 bedroom properties account for the majority of owner occupied properties. The private rented sector plays a particularly

¹⁵ West Sussex County Council (2015) Indices of Deprivation- Horsham [Online] Available at: <https://isna.westsussex.gov.uk/assets/pdf/maps/Horsham-IMD-2015.pdf>

¹⁶ Icen Projects Limited (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-Assessment.pdf

¹⁷ HM Land Registry (2021) House Price Index England: July 2021 [Online] Available at <https://www.gov.uk/government/statistics/uk-house-price-index-england-july-2021/uk-house-price-index-england-july-2021#economic-statement>

¹⁸ Horsham District Council (2017/18) Authority Monitoring Report Chapter 3: Housing [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0018/55710/AMR_2017_2018_CHAPTER_3_Housing.pdf

¹⁹ Office of National Statistics (2021) Housing Affordability in England and Wales [Online] Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2021#:~:text=In%20England%2C%20average%20house%20prices,overall%20housing%20became%20less%20affordable.>

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 group²⁰.

- A.11 There were 226 gross affordable housing completions for social/affordable rent and intermediate housing during 2020/21 reporting period. Prior to 31 March 2020 the Council was in receipt of £9,064,699.14 for affordable housing in the District²¹. The Council monitors affordable housing provision and the housing waiting lists. As of 1 April 2021 there were 778 households on the Council's social housing register. The housing completions in Horsham District are shown below in **Table 3.2**. Six individual sites contributed to the gross affordable housing figure and these include; Land East of Billingshurst, Old Guildford Road Broadbridge Heath, Kilnwood Vale, Highfield Codmore Hill, Worthing Road Southwater, King Edwards Close Christ's Hospital²²

²⁰ Chilmark Consulting (2016) Market Housing Mix- Crawley and Horsham [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0011/41897/Crawley-and-Horsham-Market-Housing-Mix-Report-Final-FCA081216.pdf

²¹ Horsham District Council (2020/2021) Financial Contributions Statement [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0011/108875/FINAL-Infrastructure-Funding-Statement-2020-21.pdf

²² Horsham District Council (2020/21) Authority Monitoring Report Chapter 3: Housing [Online] Available at https://www.horsham.gov.uk/__data/assets/pdf_file/0017/109232/AMR_2020_2021_CHAPTER_3_Housing.pdf

Hou	2	2	2	2	2	2	20	2	2	2
Soci	7	1	1	1	1	1	15	2	n/	n
Inter	2	3	1	7	-	7	90	2	n/	n

Sub-	9	1	2	2	1	2	24	3	2	2
Priva	1	3	6	6	1	6	92	1,	7	6

Tota	2	5	8	8	1	9	1,	1,	9	8
%	3	2	2	2	-	2	21	2	2	2

Table 0.2 Housing completions, including affordable housing in Horsham District 2011/12 to 2017/18

A.12 The District’s housing requirement (2022) 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 requirements²³. 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 identified²⁴. The gross number of housing completions on previously developed land in recent reporting years has seen an increase from 235 in the 2012/13 AMR to 387 in 2015/16. This increase was due to the large number of houses delivered at the large strategic scale sites West Bewbush and West of Horsham during this period. The figure for 2016/17 fell to 242, and the total number has since fallen to 140 in 2020/21 which is the most recent reporting year. The percentage of completions on previously developed land sites has fallen in 2020/21 from the previous monitoring year from

²³ 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

²⁴ 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

32.7% to 16.6%²⁵. Due to the rural nature of the District, there is comparatively less brownfield land present than in the surrounding districts and boroughs.

²⁵ Horsham District Council (2020/21) Authority Monitoring Report Chapter 3: Housing [Online] Available at https://www.horsham.gov.uk/__data/assets/pdf_file/0017/109232/AMR_2020_2021_CHAPTER_3_Housing.pdf

Gypsy, Traveller and Travelling Showpeople

- A.13 The Gypsy and Traveller Accommodation Assessment (January,2020) identified that there were 119 gypsy or traveller pitches in the District. The number of identified gypsy and traveller pitches identified in the District in 2021 was recorded 137. Of the 137 recorded, 49 were unauthorised caravans predominantly on private land and 88 were authorised sites with planning permission. Of these authorised sites 41 were socially rented caravans and 47 were private caravans²⁶.
- A.14 The Gypsy and Traveller Accommodation Assessment suggested that between 2019 and 2036 there was a need for an additional 93 pitches to be delivered. In the District during the period October 2012 to 31 March 2021, 82 Gypsy and Traveller pitches were granted planning permission on 18 separate sites²⁷
- A.15 The Council published a second draft of the Gypsy, Traveller and Travelling Showpeople Development Plan Document (DPD) for consultation in December 2017. The DPD was produced to identify further pitches for Gypsies and Travellers, finding that there were insufficient sites available to meet the identified need of the community. Subsequently, the Gypsy and Traveller Accommodation Assessment was carried out in 2020, and a new Gypsy, Traveller and Travelling Showpeople policy will be incorporated in the Horsham Local Plan Review..

Education

- A.16 In 2021 there were 114,900 residents aged 19 and over in the District. For the period January 2021 to December 2021 86.3% of residents aged 16-64 were found to have NVQ Level 1 qualifications or better, 80.9% were found to have NVQ Level 2 qualifications or better, 66.7% were found to have NVQ Level 3 qualifications or better and 41% were found to have NVQ Level 4 qualifications or above. This is slightly lower than the regional and UK average, where 90.4% in the South East and 87.5% in the UK have NVQ Level 1 qualifications or better. The percentage of those in Horsham with no qualification for the same period of time has a sample size too small to provide a reliable estimate. 6.6% of the UK population have no qualifications²⁸.
- A.17 There are 44 primary schools in Horsham District and six 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.
- A.18 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

²⁶ Horsham District Council (2020/2021) Authority Monitoring Report Chapter 3: Housing [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/109232/AMR_2020_2021_CHAPTER_3_Housing.pdf

²⁷ Horsham District Council (2020/2021) Authority Monitoring Report Chapter 3: Housing [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/109232/AMR_2020_2021_CHAPTER_3_Housing.pdf

²⁸ NOMIS Labour Market Profile – Horsham [Online] Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx?town=horsham#tabquals>

students²⁹. As of January 2022, one of the primary schools and the secondary school has been delivered and are operational³⁰. Additional early years' provision was also identified as required to accommodate 98 children. Across the four school planning areas in Billingshurst, Horsham East, Horsham West and Steyning/Storrington all have been identified as currently having net capacity at primary schools as of autumn 2022. For secondary provision, Billingshurst, Horsham East and Steyning/Storrington currently have capacity, however Horsham West is operating above 95%, the figure at which the school planning area is deemed to be full³¹.

Deprivation

- A.19 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, include Faygate and Kilnwood Vale, and Horsham Riverside³².
- A.20 Slinfold is the only ward in Horsham which falls within the 30% most deprived areas in the UK³³. In comparison there are 5 LSOAs in West Sussex which lie within the 10% most deprived in England and 13 which lie within the 20% most deprived. Horsham ranked the 290th out of a total of 317 local authorities in England, where 1 is most deprived and 327 is the least³⁴.
- A.21 As reported up to September 2022 the District has a lower proportion of residents (2%) who receive Universal Credit than at the regional (2.9%) and national level (3.7%). The broader span of claimants covered under this benefit than that covered by Jobseeker's Allowance means that as this benefit is rolled out in particular areas, the number of people recorded as being on the claimant count is likely to rise. This trend is however applicable to Great Britain as a whole not only to Horsham. While the proportion of young people (aged 18 to 24) in Horsham who currently receive this benefit (2.9%), is higher than the proportion of older people (aged 25 to 49) who receive it (2.3%), the figure for young people is lower than the figure for the South-East (3.5%) and Great Britain (4.6%)³⁵.
- A.22 In Horsham in 2020 it was estimated that 6.9% of households (4,085) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 8.2%³⁶. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

²⁹ 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

³⁰ West Sussex County Council (2022) Planning School Places [Online] Available at: https://www.westsussex.gov.uk/media/12383/planning_school_places.pdf

³¹ West Sussex County Council (2022) Planning School Places [Online] Available at: https://www.westsussex.gov.uk/media/12383/planning_school_places.pdf

³² Ministry of Housing, Communities and Local Government (2019) English Indices of Deprivation [Online] Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³³ Ministry of Housing, Communities and Local Government (2019) English Indices of Deprivation [Online] Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³⁴ Ministry of Housing, Communities and Local Government (2019) English Indices of Deprivation [Online] Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

³⁵ NOMIS Labour Market Profile – Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/1a/1946157343/report.aspx?town=horsham#tabquals>

³⁶ Department for Business, Energy & Industrial Strategy (2020) Sub regional fuel poverty data 2022 [Online] Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2022>

Health

- A.23 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 care³⁷.
- A.24 Average life expectancy in Horsham is slightly above the national average, being 82.5 for males and 85.1 for females. Life expectancy is 6.5 years lower for men and 4.9 years lower for women in the most deprived areas of Horsham than in the least deprived areas. Estimated levels of adult excess weight are similar to the national average of 62%, with an average of 61.1% for Horsham.³⁸
- A.25 In 2021, Horsham had a slightly lower percentage of adults who consider themselves physically active (69.2) than West Sussex (65%). The figure for the District is however above the national average (61%)³⁹. 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 November 2020 to November 2021 figures that of those interviewed 34.8% participated in thirty minutes moderate intensity sport once every other week (at least two sessions in the previous 28 days). This showed slight increase on figures for 2019-2020 which was 33.5%⁴⁰.

Open spaces, sports and recreation

- A.26 95km² land area of the Horsham District is situated within the South Downs National Park⁴¹, which is an important informal recreational resource. Horsham contains over 400 hectares of greenspace, including 53 play areas which are managed by the Council. Many of the parishes are responsible for the maintenance of additional sites. There are also a number of recreation grounds, woodlands, allotments, cemeteries, green corridors and a number of strategic green spaces within the District. Notable areas of strategic green space include Southwater Country Park and Chesworth Farm, Warnham Local Nature Reserve and Horsham Park⁴².
- A.27 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 allotments⁴³.
- A.28 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,

³⁷ NOMIS – Local Area Report (2011) –Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

³⁸ Public Health England (2020) Local Authority Health Profile 2019 – Horsham [Online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000227.html?area-name=Horsham>

³⁹ Sport England (2021) Active Lives Survey 2021 [Online] Available at <https://activelives.sportengland.org/>

⁴⁰ Sport England (2021) Active Lives Survey 2021 [Online] Available at <https://activelives.sportengland.org/>

⁴¹ 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

⁴² 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

⁴³ Horsham District Council (2014) Green Infrastructure Strategy [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/50956/CD_EN_03_Green-Infrastructure-Study.pdf

leisure centres, playing fields and parks, allotments and children's play areas). A total of 396,420 visitors at Horsham's leisure centres were recorded during the 2020/21 report period, a 65% reduction in usage from the previous reporting period as due to the lockdown imposed in response to the Covid-19 pandemic the centres were closed for much of the year. During the most recent reporting period 633 gross sq. metres of leisure floorspace was completed on two sites outside the Horsham built up area boundary.⁴⁴In addition other forms of provision for leisure and recreation activities are present in the District, including a cinema, museums, libraries, restaurants and pubs.

- A.29 A number of strategic recreation routes also pass through the District including the Down's link⁴⁵. 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.
- A.30 In June 2021 an updated audit of the quantity and quality of public accessible sports, recreation and open space across the District was carried out. The total quantity of multi-functional green spaces in the District equates to 13.7m² per person of parks and gardens, 5.8m² per person of amenity green space and 24.3m² per person of natural and semi natural green space⁴⁶.
- A.31 The Open Space, Sport and Recreation Review 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 parks and gardens, semi natural greenspace, amenity greenspace, children's play, provision for young people and allotments. 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 Washington and Shermanbury⁴⁷. 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

- A.32 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 64 per 1,000 of the population compared to nationally, 79.5 per 1,000 of the population in 2021⁴⁸. The total number of recorded crimes in Horsham in the selected categories has decreased by 14.6% between the last two monitoring years ending in 2021. Increases in certain types of crime relate to violent crime, weapon use and illegal drug use, at both the County and

⁴⁴ Horsham District Council (2022) Annual Monitoring Report 2020-2021 [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

⁴⁵ 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

⁴⁶ Knight, Kavanuagh & Page (2021) Horsham Open Space, Sport & Recreation Review [Online] Available at https://www.horsham.gov.uk/__data/assets/pdf_file/0012/104250/Non-Tech-Summary-PprJun2021FINAL.pdf

⁴⁷ Knight, Kavanuagh & Page (2021) Horsham Open Space, Sport & Recreation Review [Online] Available at https://www.horsham.gov.uk/__data/assets/pdf_file/0012/104250/Non-Tech-Summary-PprJun2021FINAL.pdf

⁴⁸ Crime Rate (2022) UK Crime Rates 2021-2022 [Online] Available at: <https://crimerate.co.uk/>

national levels. At a County level, within West Sussex, violent crime, anti-social behaviour and public order offences are the principal contributors to the recorded level of crime and these recorded categories account for over half of all crimes committed⁴⁹.

A.33 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 0.3** below gives a selective illustration of crime levels in Horsham⁵⁰.

Table 0.3 Horsham District: Selected recorded crime statistics

AMR Year > Offence Group	2	2	2	2	2	2	Yea	Year
Criminal damage and arson	9	7	7	8	9	7	-	-
Drug offences	1	1	1	2	2	2	74	36.6
Miscellaneous crimes	1	1	1	1	1	1	-9	-
Possession of weapons offences	3	6	5	8	9	7	-27	-

⁴⁹ UK Crime Stats (2022) West Sussex Police [Online] Available at: <https://ukcrimestats.com/Subdivisions/CTY/2244/>

⁵⁰ Horsham District Council (2021) Authority Monitoring Report 2020/21 Chapter 6: HDPF Policy Monitoring [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

Public order offences	3	4	5	6	6	6	-44	-
Robbery	2	3	3	2	5	2	-32	-
Sexual offences	1	2	2	2	2	2	-26	-
Theft offences	1	2	2	2	2	1	-	-
Violence against the person	1	1	1	2	2	2	-85	-
TOTAL	5	5	6	6	6	5	-	-

A.34 Nationally, average crime rates are lower in rural areas than urban areas. For example, in 2021, the rate of violence was 24.7 per 1,000 population in predominantly rural areas compared to 37.3 per 1,000 population in predominantly urban areas. This would suggest that the rural areas of Horsham would similarly have a lower rate of violence than the more built up areas⁵¹.

A.35 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

⁵¹ Department for Environment Food & Rural Affairs (2022) Statistical Digest of Rural England: Crime [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087018/Crime_Jun_22_final.pdf

than the national rate which was recorded as 40.8 per 100,000 population⁵². 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

A.36 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. **Chapter 0** addresses air pollution in the District in more detail.

Table 0.4 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
<p>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.</p>	<p>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</p>	<p>SA objective 2</p>

⁵² West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

	a coherent, sustainable manner alongside new development.	
<p>House prices in Horsham are high comparable to the regional and national average. The level of socially rented housing which is currently provided in the District is also significantly lower than the regional and national level. As a whole, the delivery of affordable housing is considerably lower than the need identified and there are a high number of residents currently on the waiting list for this type of provision. There is also continued need in the District for housing suitable for the elderly, families and the Gypsy and Traveller community.</p>	<p>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.</p> <p>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,</p>	SA objective 1

	<p>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.</p>	
<p>Horsham is one of the least deprived local authorities in the UK. However, there are disparities between the least and the most deprived areas in Horsham. A number of wards are within 40% of the most deprived in the UK.</p>	<p>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,</p>	<p>SA objective 1 SA objective 2 SA objective 3 SA objective 5</p>

	<p>employment deprivation, living environment deprivation and education skills deprivation are appropriately addressed. This approach will also allow for changing circumstances in the District to be more appropriately addressed.</p>	
<p>Health in Horsham is generally recorded as being at reasonably good level or higher. However, levels of obesity and excess weight in the District are slightly above the national average Furthermore there are inequalities displayed between the most and least deprived areas of the District in terms of health.</p>	<p>The topic of health is intertwined with many policies throughout the current HDPF. This includes Policies 40, 42 and 43 which seek to encourage active modes of transport, create socially inclusive and adaptable environments and provide new or improved community facilities or services. However, without the Local Plan Review policies will be less suitable to help prevent any continued rise in levels of obesity in the District, although national campaigns may work to reduce this. The Local Plan Review could further contribute to tackling obesity through policies that more appropriately seek to encourage uptake of active modes of transport and access to green space and other</p>	<p>SA objective 2 SA objective 3 SA objective 5 SA objective 14</p>

	<p>recreation opportunities. The Local Plan Review also presents an opportunity to address health deprivation in the District by supporting the provision of healthcare facilities and other relevant improvements at areas of most need.</p>	
<p>Horsham provides access to a number of important areas of open space and green infrastructure. This includes South Down National Park to the south and High Weald AONB to the north east. A deficiency in recreational or open space provision has been identified in a number of specific areas including provision for play and allotments. There is also potential for new development to result in loss of access to open spaces and elements</p>	<p>Policies 31, 32, 42 and 43 in the HDPF seek to support the appropriate maintenance and provision of new green infrastructure, open spaces and services and facilities for residents. However, without the Local Plan Review there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas will remain limited. The Local Plan Review offers the opportunity to better address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space and services and facilities. The review process will also allow for new local green spaces to be planned and incorporated alongside new development.</p>	<p>SA objective 2 SA objective 7</p>

<p>of green infrastructure as well as impacts upon their quality.</p>		
<p>In general Horsham is a relatively safe District in which to live. In recent years however certain types of crime such as violent crime, weapon use and illegal drug use have increased in the District.</p>	<p>Policy 33 of the HDPF sets out design principles for new development in the District and these include the incorporation of measures to reduce opportunities for crime. This policy would remain in place in the absence of the Local Plan Review. The Local Plan Review however presents an opportunity to build on the requirement of this policy to encourage aims to make the local environment and streets safer, for example through relevant approaches to 'designing out' crime. Any new policy would make a contribution to achieving this aim alongside other local and national measures.</p>	<p>SA objective 4</p>

Economy

- A.2 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.
- A.3 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 drink⁵³.

- A.4 The Coast to Capital LEP⁵⁴ operates as a network of functional economic hubs within which many international brands have their UK bases. The LEP is the combined seventh largest economy in England with a total GVA of £50.7 billion. Horsham has a GVA of £3,573 million which places it sixth out of the fourteen local authorities that comprises the LEP. Labour productivity for the District is recorded as £25,889 which is slightly below the average for the LEP area (£26,202)⁵⁵.
- A.5 The future projected growth to Gatwick Airport is likely to have an influence on employment opportunities accessible to the residents of Horsham. The airport is planning to accommodate growth in air traffic by bringing the Northern Runway into regular use. The Masterplan for the Northern Runway indicates that Gatwick could accommodate around 70 million passengers by 2032 and deliver £20 billion of added economic benefit to the region⁵⁶
- A.6 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 identified as not being met through current provision⁵⁷.
- A.7 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 psf⁵⁸.
- A.8 The decline of British High Streets is reported to be "*getting faster*" however this is a trend which is being experienced across the UK. The growth of e-commerce and

⁵³ 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>

⁵⁴ 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.

⁵⁵ The Coast to Capital LEP (2018) The Coast to Capital Strategic Economic Plan 2018-2030 [Online] Available at:

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

⁵⁶ Gatwick Airport (2019) Making best use of Gatwick [Online] Available at:

https://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/future-plans/gatwick_northern_runway_digital.pdf

⁵⁷ Horsham District Council (2017) Horsham Town Centre Vision [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/71354/Horsham-Town-Centre-Vision-Statement-November-2017.pdf

⁵⁸ Horsham District Council (2017) Horsham Town Centre Vision [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/71354/Horsham-Town-Centre-Vision-Statement-November-2017.pdf

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 thriving⁵⁹.

- A.9 Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the District with 17.9% of the working population employed in this industry. The next largest sector is administrative and support service activities (10.7%).⁶⁰
- A.10 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 (19.1%) followed by associate professional and technical occupations (14.8%) and manager, directors and senior officials (14.1%). Horsham has a similar mean wage (£36,218) to that recorded for the South East region (£36,800) and slightly higher than the national mean (£33,402)⁶¹.
- A.11 Horsham District's economically active population was 85.6% in the year ending in June 2022. This figure is above that for the region (80.9%) and nation (78.6%). There has been a fluctuation in economically active females between 2015 and 2022. At regional and national levels rates of economically active females have remained relatively stable.⁶²
- A.12 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 locations⁶³. These patterns are influenced by Horsham's strong transport links to surrounding areas which provide a strong employment offer. The A24 travels through Horsham and allows for connections to both Crawley and Worthing. Strong links are also provided to London and the South Coast via M23, M25, A24 and A29. Furthermore over 80 rail services are available to London daily⁶⁴. 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 Crawley⁶⁵.
- A.13 In total, the gross employment floorspace developed within the District for the year 2020/21 was 19,614 m² (the net figure is 18,033.9 m²). This is lower than that recorded for the 2019/20 year, which was 24,803.2 m². Around 46% of new employment floorspace developed in the monitoring year was for B8 use (Storage & Distribution).

⁵⁹ Horsham District Council Horsham Town Centre Vision [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/71354/Horsham-Town-Centre-Vision-Statement-November-2017.pdf

⁶⁰ NOMIS – Labour Market Profile (2022) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabjobs>

⁶¹ Office for National Statistics (2022) Earnings and hours worked, place of residence by local authority [Online] Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/placeofresidencebylocalauthorityashetable8>

⁶² NOMIS – Local Area Report (2022) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

⁶³ West Sussex County Council (2011) Census Bulletin: Travel to work in and beyond West Sussex [Online] Available at: https://www.westsussex.gov.uk/media/4622/censusbulletin_traveltowork.pdf

⁶⁴ 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

⁶⁵ 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

There is no discernable trend from these figures, however the overall increase, particularly for non-storage uses, still reflects the desirable nature of Horsham District as a location for businesses⁶⁶. 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 0.6% lower than the national average (1.1%). There has been a rise across all age categories in terms of the number so people receiving Job Seekers Allowance, 18 to 24 year olds are still more likely to be claiming this benefit than older people. This may be due in part to the lack of further educational facilities and reduced access to entry-level jobs in the District. Of the population in Horsham, 85.6% are economically active which is higher than the figure for the South East region which is 80.9%⁶⁷

A.14 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 indicator⁶⁸.

Table 0.5 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 national average. It forms part of the Gatwick Diamond and Coast to Capital LEP, which allows for links to important economies in the surrounding area. The rural	It is uncertain how the job market will change without the implementation of the Local Plan Review and some degree of change is inevitable, particularly given the uncertainties posed by Brexit. Policies 7, 9, 10 and 11 of the HDPF seek to ensure the growth of new economic and	SA objective 3 SA objective 16 SA objective 17

⁶⁶ Horsham District Council (2021) Annual Monitoring Report 2020/21 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

⁶⁷ NOMIS- Labour Market Profile – Horsham (2022) [Online] Available at: <https://www.nomisweb.co.uk/reports/imp/la/1946157343/report.aspx#tabempunemp>

⁶⁸ 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

<p>character of the District and close proximity of employment centres such as Crawley, and London and Brighton and Hove further afield means that the area sees a significant net outflow of commuters. Horsham needs to ensure a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and issues of deprivation are tackled. This is of particular relevance considering the negative net commuting flow which the District experiences.</p>	<p>employment opportunities including those for tourism and rural employment and also to protect existing Key Employment Areas. Furthermore Policy 39 addresses the provision of new infrastructure to meet new needs of development including employment growth. However, the Local Plan Review offers the opportunity to create and safeguard jobs through the allocation and promotion of new employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.</p>	
<p>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.</p>	<p>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.</p>	<p>SA objective 3</p>

Transport Connections and Travel Habits

- A.15 Horsham is located in the central northern part of West Sussex County and covers a large area of the county (250km²) of which the majority is rural. Currently, 88% of the population have one car or van or more⁶⁹. 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 issues⁷⁰.
- A.16 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 periods⁷¹. Bus services are generally good within the town of Horsham 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 in Horsham⁷². Many outlying rural communities are offered limited bus services that do not provide a convenient travel option and many people rely on the private car to access employment and services. This includes services which operate less frequently than two hourly at least five days a week⁷³.
- A.17 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 junction⁷⁴.
- A.18 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%

⁶⁹ 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

⁷⁰ Gatwick Diamond Local Strategic Statement (2017) [Online] Available at: <https://crawley.gov.uk/sites/default/files/documents/PUB344429.pdf>

⁷¹ 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>

⁷² West Sussex County Council (2022) Join a car share club [Online] Available at: <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/travelwise-sustainable-transport/join-a-car-club/#car-clubs-in-west-sussex>

⁷³ West Sussex County Council (2022) Bus routes and timetables [Online] Available at: <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/bus-and-coach-travel/plan-your-journey/bus-routes-and-timetables/>

⁷⁴ West Sussex District Council (2022) West Sussex Transport Plan [Online] Available at: <https://www.westsussex.gov.uk/media/17428/wstp.pdf>

increase on passengers using the faster services and 44% increase of passengers using the stopping services from Sussex into central London. Routes into London are particularly busy, with limited capacity to operate additional services⁷⁵.

- A.19 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 work⁷⁶. 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 work⁷⁷. 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 population⁷⁸. The Covid-19 pandemic is likely to have impacted on this data, as working from home and hybrid working has become more commonplace⁷⁹.
- A.20 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.
- A.21 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 town⁸⁰.

Table 0.1 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	Policy 39 of the HDPF addresses the provision of new	SA objective 13

⁷⁵ 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>

⁷⁶ NOMIS method of travel to work (2011) Horsham [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157343?rows=cell&cols=rural_urban

⁷⁷ Horsham District Council (2018) Annual Monitoring Report 2012/18 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/55713/AMR_2017_2018_CHAPTER_6_Policy_Indicators_final.pdf

⁷⁸ 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

⁷⁹ Office for National Statistics (2020) Coronavirus and travel to work: June 2020 [Online] Available at:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/coronavirusandtraveltowork/june2020>

⁸⁰ West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026

<p>of congestion and delays. Rail capacity is also currently stretched and capacity pressures London services are expected to increase. Population growth has the potential to exacerbate these problems.</p>	<p>infrastructure to meet new needs of development and this includes new transport provisions. Furthermore Policy 40 supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However, without the Local Plan Review there is potential for congestion to continue to be an issue in Horsham, particularly given that the growing population is likely to exacerbate this issue. The Local Plan Review presents the opportunity to address this by providing clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by highways authorities to combat congestion on the strategic road network.</p>	
<p>Given the rural character of much of the District a large proportion of the District's residents drive to work and some have access to limited bus services and other public transport links.</p>	<p>Policy 40 of the HDPF supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However the Local Plan Review presents the opportunity to further address the issue of car dependency in the District. This can be achieved by promoting sustainable and active transport (based on sufficient population densities), sustainable development locations, and integrating new and more sustainable technologies, as new</p>	<p>SA objective 13</p>

	development is to be provided in the District.	
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Air, Land and Water Quality

Air quality

- A.22 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.
- A.23 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.
- A.24 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.
- A.25 There are several locations, within Horsham, where levels of (NO₂) exceed the UK and EU air quality standards. Horsham District Council has identified parts of two villages, Storrington and Cowfold, where NO₂ levels exceed the annual mean air quality objective. At high concentrations NO₂ can act as an irritant causing inflammation of the airways and, by affecting the immune cells in the lungs, can increase susceptibility to respiratory infections. Air quality action plans have been developed for both AQMAs⁸¹⁸². Both AQMAs are located along busy 'A' road routes which accommodate high traffic volumes and have residential properties situated close to the kerbside. There are several other villages within the District which share similar characteristics in their potential to be susceptible to air quality issues.
- A.26 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.
- A.27 A number of measures have been taken forward by Horsham District Council in the reporting year of 2021 to help improve local air quality. These includes ecurring a new

⁸¹ Horsham District Council (2013) Cowfold Air Quality Action Plan [Online] Available at: <https://www.horsham.gov.uk/environmentalhealth/environmental-health/air-quality/cowfold-air-quality>

⁸² Horsham District Council (2012) Storrington Air Quality Action Plan [Online] Available at: <https://www.horsham.gov.uk/environmentalhealth/environmental-health/air-quality/storrington-air-quality>

vehicle fleet for HDC's Neighbourhood Wardens, finalising a contract to deliver a district-wide electric vehicle charging point network, and completion of the Horsham Local Cycling and Walking Infrastructure Plan⁸³.

Geology and minerals

- A.28 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 District⁸⁴.
- A.29 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 Joint Minerals Local Plan (2018-2033)⁸⁵. 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. Existing mineral extraction sites and mineral infrastructure sites are also safeguarded through policies M9 and M10 of the plan. In the monitoring year 2020/21 there were 11 safeguarded mineral extraction and infrastructure sites in Horsham District outside of the South Downs National Park⁸⁶.
- A.30 West Sussex County Council have allocated a site in Horsham District through the Joint Minerals Local Plan for the extraction of soft sand at Ham Farm, Steyning. An extension to the Chantry Lane quarry in Storrington is also allocated for soft sand extraction, although the site lies within the administrative boundary of the South Downs National Park Authority.⁸⁷ 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

- A.31 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

⁸³ Horsham District Council (2022) Air Quality Annual Status Report [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0007/118447/ASR2022_HorshamDistrict.pdf

⁸⁴ 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

⁸⁵ West Sussex County Council and South Downs National Park Authority (2021) West Sussex Joint Minerals Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

⁸⁶ West Sussex County Council (2022) West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2020/21 [Online] Available at: https://www.westsussex.gov.uk/media/17440/monitoring_report_2020to2021.pdf

⁸⁷ West Sussex County Council and South Downs National Park Authority (2021) West Sussex Joint Minerals Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

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 alluvium⁸⁸.

- A.32 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 town⁸⁹.

Contaminated land

- A.33 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 were town gas holdings located across the District, including Horsham, Christ's Hospital, Storrington and Steyning⁹⁰. These areas are recognised as those at which past use may have resulted in contamination.
- A.34 In 2017, existing land uses of a notable scale in the District which could contribute towards contaminated land areas in the future were 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 substances⁹¹.

Water

- A.35 Horsham District is situated in an area of serious water stress, as identified by the Environment Agency Water Stressed Areas Classification. The whole of the District is within the Sussex North Water Supply Zone, where groundwater abstraction may be having an adverse effect on a number of environmentally designated sites. Natural England have indicated that development should not add to the adverse impact. A way of achieving this is for all new development to demonstrate water neutrality.
- A.36 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

⁸⁸ 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

⁸⁹ Natural England (2011) Agricultural Land classification Map- London and the South East [Online] Available at: <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

⁹⁰ 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

⁹¹ 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

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.

- A.37 The District is covered by the River Basin Management Plan for the South East River Basin District, managed by the Environment Agency. 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 west⁹².
- A.38 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, and all have been identified as having ‘fail’ chemical status^{93 94}.
- A.39 A further breakdown of the number of water courses which have achieved various ecological and chemical classifications is provided in **Tables 6.1 and 6.2**. For both catchment areas the reasons for not achieving good status and reasons for deterioration in water quality were mainly pollution from rural areas and physical modifications. In Horsham during the 2020/21 monitoring year no objections to planning applications was received from the Environment Agency on water quality grounds⁹⁵.

Table 0.2 Ecological and Chemical Classification for surface waters in Adur and Ouse catchment

Number of water bodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
46	4	18	24	0	0	46	0

Table 0.3 Ecological and chemical classification for surface waters in Arun and Western Streams catchment

⁹² Environment Agency (2015) Water for life and livelihoods - Part 1: South East river basin district River basin management plan [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf

⁹³ Environment Agency (accessed 2022) Adur and Ouse – Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3000/print>

⁹⁴ Environment Agency (accessed 2022) Arun and Western Streams - Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3004/classifications>

⁹⁵ Horsham District Council (2022) Authority Monitoring Report 2020/21 [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

Number of water bodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
40	2	15	22	1	0	40	

- A.40 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 southwest 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 Zone⁹⁶.
- A.41 All of Horsham District, most of Crawley Borough, and parts of Chichester District, Mid Sussex District and the South Downs National Park – all in West Sussex County - fall within the Southern Water Sussex North Water Resource Zone (WRZ).
- A.42 The Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of;
- Arun Valley Special Area Conservation (SAC)
 - Arun Valley Special Protection Area (SPA)
 - Arun Valley Ramsar Site.
- (Natural England’s Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach)
- A.43 The water supply in question is sourced from abstraction points in the Arun Valley, which also includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/ Special Area of Conservation (SPA/SAC) and Ramsar site (the Arun Valley Sites). The Arun Valley Sites are of international importance because of their inland water bodies, bogs, marshes, humid grassland, other water-dependent habitats, and overwintering waterfowl.
- A.44 The Habitats Regulations 2017 (as amended) requires Local Authorities to demonstrate that there is no adverse ‘in combination’ impact on the integrity of SPAs and SACs. This means that by law, the Councils must prepare Local Plans that clearly shows that they will not have an adverse (or negative) effect on these important wildlife sites.

Waste

- A.45 The District is performing well in terms of achieving a high rate of waste which is sent to be recycled. A total of 29,673 tonnes of household waste was recycled or composted during the 2020/21 reporting period⁹⁷. This represents 55% of total household waste generated in the District.

⁹⁶ DEFRA (2022) Magic Map [Online] Available at: <https://magic.defra.gov.uk/MagicMap.aspx>

⁹⁷ Horsham District Council (2022) Authority Monitoring Report 2020/21 [Online] Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

- A.46 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 recycled⁹⁸.
- A.47 Policy W10 of the West Sussex Waste Local Plan allocates two sites at Brookhurst Wood, north of Horsham town, for waste management facilities. One site for the transfer, recycling, and/or recovery of waste (including the recycling of inert waste), and the other site for the extension of an existing landfill site to meet an identified shortfall for inert landfill capacity. Policy W2 of the plan safeguards existing waste management sites and waste infrastructure from non-waste development. Site promoters need to demonstrate that non-waste development will not prejudice or prevent the use of existing waste management sites or infrastructure that make an important contribution to the transfer and processing of waste⁹⁹. In the monitoring year 2020/21 there were 16 safeguarded waste management and infrastructure sites in Horsham District outside of the South Downs National Park¹⁰⁰

Table 0.4 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>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</p>	<p>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.</p>	<p>SA objective 14</p>

⁹⁸ Horsham District Council (2018) Authority Monitoring Report 2017/18 Chapter 6: HDPF Policy Monitoring [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/55713/AMR_2017_2018_CHAPTER_6_Policy_Indicators_final.pdf

⁹⁹ West Sussex County Council (2014) Waste Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/3241/waste_local_plan_april2014.pdf

¹⁰⁰ West Sussex County Council (2022) West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2020/21 [Online] Available at: https://www.westsussex.gov.uk/media/17440/monitoring_report_2020to2021.pdf

<p>neighbouring authorities alongside development in Horsham in terms of air quality at AQMAs in Horsham.</p>	<p>Nonetheless, the Local Plan Review provides an opportunity to contribute to improved air quality in the District through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.</p>	
<p>The District contains a mix of classified agricultural land, the majority being Grade 3, with small areas of Grade 2 and Grade 4. New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.</p>	<p>The HDPF seeks to promote the development of brownfield land which is not of high environmental value through Policy 2. Furthermore the NPPF supports the re-use of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by <i>“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”</i>. The Local Plan Review provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.</p>	<p>SA objective 9</p>
<p>The District contains safeguarded mineral resources, minerals infrastructure and waste infrastructure which, where possible, should not be lost or compromised by future growth.</p>	<p>Without the Local Plan Review it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy M9 of the West Sussex Joint Minerals Local Plan addresses Proposals for non-</p>	<p>SA objective 10</p>

	mineral development within the Minerals Safeguarded Areas.	
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 is located and designed to take into account the sensitivity of the water environment. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.	SA objective 11
The whole of the District is within the Sussex North Water Supply Zone, where groundwater abstraction may be having an adverse effect on a number of environmentally designated	Without the Local Plan Review it is possible that development will be able to come forward without being able to adequately demonstrate water neutrality. This will have an impact on environmentally designated sites	SA Objective 1 SA Objective 6 SA Objective 10 SA Objective 11

<p>sites. Natural England have indicated that development should not add to the adverse impact.</p>	<p>due to increased water consumption from new development. The Local Plan Review incorporates policies to ensure that development coming forward must demonstrate that they will have no adverse impact on environmentally designated sites due to increased water abstraction.</p>	
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Climate Change Adaptation and Mitigation

- A.48 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.

Climate change adaptation

- A.49 The Met Office UK Climate Projections 2018 study (updated for 2022) that provides 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 up to 5.1°C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 45% in this scenario. Winters could be up to 3.8°C warmer, with up to 39% more rainfall by 2070¹⁰¹.
- A.50 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 day¹⁰².
- A.51 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.
- A.52 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 winters¹⁰³. The Environment Agency has produced peak river flow allowances by river basin district which account for variation due to climate change. **Tables 7.1 and 7.2** below shows the potential change identified for the given time periods for the South East river basin district within which Horsham falls.

¹⁰¹ Met Office (2022) UK Climate Projections: Headline findings [Online] Available at: https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v4_aug22.pdf

¹⁰² Met Office (2018) UKCP18 Factsheet: Derived projections [Online] Available at: <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-derived-projections.pdf>

¹⁰³ Horsham District Council (2015) Horsham District Planning Framework [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

Table 0.1 Peak river flow allowances for Adur and Ouse Management Catchment (1981-2000 baseline)¹⁰⁴

Allowance Category	Total potential change anticipated for 2020s	Total potential change anticipated for 2050s	Total potential change anticipated for 2080s
Upper	40%	57%	107%
Higher	23%	28%	55%
Central	16%	18%	37%

Table 0.2 Peak river flow allowances for Arun and Western Streams Management Catchment (1981-2000 baseline)¹⁰⁵

Allowance Category	Total potential change anticipated for 2020s	Total potential change anticipated for 2050s	Total potential change anticipated for 2080s
Upper	27%	36%	64%
Higher	16%	19%	36%
Central	11%	13%	25%

Climate change mitigation

A.53 West Sussex County Council and Horsham District Council are both committed to a target of becoming carbon neutral by 2030^{106,107}. As **Table 7.3** below demonstrates that there has been a year on year reduction in the total greenhouse gas emissions for the County between 2018 and 2020. Domestic greenhouse gas emissions for Horsham District also fell by 144.4 kilotonnes CO₂ equivalent between 2018 and 2020. These points considered, Horsham District has the second highest tonnage of greenhouse gas emissions in the County in 2020 (660kt CO₂e) and the second highest per capita emissions of 4.5 tonnes of CO₂e emissions per capita¹⁰⁸.

¹⁰⁴ Department for Environment Food and Rural Affairs (2021) Peak river flow allowances [Online] Available at: <https://environment.data.gov.uk/hydrology/climate-change-allowances/river-flow>

¹⁰⁵ Department for Environment Food and Rural Affairs (2021) Peak river flow allowances [Online] Available at: <https://environment.data.gov.uk/hydrology/climate-change-allowances/river-flow>

¹⁰⁶ West Sussex County Council (2020) Climate Change Strategy 2020-2030 [Online] Available at:

https://www.westsussex.gov.uk/media/17325/climate_change_strategy_2020-2030.pdf

¹⁰⁷ Horsham District Council (accessed 2022) Reducing our carbon emissions. [Online] Available at: <https://www.horsham.gov.uk/climate-and-environment/carbon-reduction-action-plan#:~:text=The%20Council%20has%20agreed%20targets,to%20become%20carbon%20neutral%20by%202030>

¹⁰⁸ Department for Business, Energy and Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 [Online] Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

Table 0.3 Total Greenhouse Gas Emissions in West Sussex¹⁰⁹

Year	2018	2019	2020
Total Emissions (kt CO ₂ e)	4,120.9	3,918.6	3,511.2

A.54 For the year 2018 Horsham had an average rate of 5.7 tonnes of CO₂e greenhouse gas emissions per capita, however in 2020 the rate decreased to 4.5 tonnes per capita. **Table 7.4** shows greenhouse gas emissions (kilotonnes CO₂ equivalent) for Horsham for 2018 and 2020 by all sector. There has been a reduction between 2018 and 2020 across all sectors, transport accounts for the largest amount of greenhouse gas emissions. The Covid-19 pandemic may have had an impact on changes in greenhouse gas emissions in 2020, particularly regarding transport due to the imposed lockdowns.

Table 0.4 greenhouse gas emissions in Horsham (kt CO₂e)¹¹⁰

Sector	2018	2019	2020
Industry	100.9	92.7	83.6
Commercial	42.9	35.6	30
Public Sector	14.7	12.5	12.9
Domestic	234.3	222.9	221.4
Land use, land use change and forestry (LULUCF)	-67.3	-67.9	-67.9
Agriculture	94	91.1	91.2
Waste Management	89.3	58.3	54.4
Transport	296.4	293.1	234.9
Total	805.1	738.1	660.7

¹⁰⁹ Department for Business, Energy and Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 [Online] Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

¹¹⁰ Department for Business, Energy and Industrial Strategy (2022) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 [Online] Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>

A.55 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 greenhouse gas emissions from existing sources, efforts to reduce the overall energy consumption and greenhouse gas emissions have been made through changes to Part L of the Building Regulations.

Table 0.5 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>Climate change is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The rural character of the District means that there are likely to be difficulties with regards the delivery of measures to help reduce greenhouse gas emissions. The District has the second highest greenhouse gas emissions in the County. The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings.</p>	<p>Climate change is likely to have on-going effects regardless of the Local Plan Review, considering the scale of the challenge this issue poses. The HDPF already includes policies seeking to address this issue, including Policy 35 which supports development which makes a clear contribution to mitigating and adapting to the impacts of climate change. The obligation of the Council to reduce carbon emissions will also remain with or without the Local Plan Review. The Local Plan Review provides an opportunity to strengthen policies which seek to act positively in terms of climate change contributions. An important part of this overall approach will be to help limit the need to travel in the District through the appropriate siting of new development. The Local</p>	<p>SA objective 12 SA objective 15</p>

	Plan Review will also present opportunities to encourage low-carbon design, promotion of renewable energy and sustainable transport infrastructure delivery.	
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 is the source of most risk. The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding could increase in the District as a result of climate change.	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	SA objective 12 SA objective 15

	<p>measures, to mitigate the effects of potential future flooding and locate development in sustainable locations that would not be significantly impacted by flooding and ensure it is designed to be flood resilient where appropriate. The review process will also allow policy to respond most appropriately to the updated evidence base in relation to flood risk in Horsham.</p>	
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Biodiversity

- A.56 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.
- A.57 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 Local Wildlife Sites (LWSs) (previously called SNCIs) and 22 Regionally Important Geological Sites (RIGS) as designated by WSCC¹¹¹.
- A.58 41.1% of all SSSIs in Horsham District are in a favourable condition. 49.3% of the remaining SSSIs are in unfavourable but recovering condition. 6.8% of SSSIs in Horsham were found to be in declining condition¹¹².

¹¹¹ 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

¹¹² Horsham District Council (2022) Authority Monitoring Report 2020/21 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/109227/AMR_2020_2021_CHAPTER_5_Policy_Indicators.pdf

- A.59 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%¹¹³.
- A.60 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 Adur¹¹⁴. This approach is to be linked to the targeted landscape-scale approach to conserving biodiversity in Sussex.

Table 0.6 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance.</p>	<p>Pressures on the natural environment in Horsham are likely to continue regardless of the Local Plan Review particularly given the requirement for more development to meet growth projections. The HDPF includes policies seeking to address these pressures, including Policy 31 which provides for the support of the network of green infrastructure as well as sites and habitats identified for their specific importance. The Local Plan Review presents the opportunity for new development to come forward at the most appropriate locations as to</p>	<p>SA objective 6</p>

¹¹³ Weald and Downs Ancient Woodland Survey (2010) A revision of the Ancient Woodland Inventory for West Sussex [Online] Available at: <http://www.highweald.org/downloads/publications/project-reports/weald-a-down-ancient-woodland-survey/1061-west-sussex-ancient-woodland-inventory/file.html>

¹¹⁴ 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

	<p>limit detrimental impacts on biodiversity assets. The review process also offers the opportunity to update planning policy in relation to the protection of areas which are of importance in terms of their biodiversity and geodiversity value with consideration for the future evolution of development in the District and the provision of net biodiversity gain. The findings of HRA will be incorporated into the SA and will provide further insight into biodiversity impacts specifically at European sites presenting the opportunities to limit adverse impacts at such locations.</p>	
<p>Although designated sites represent the most valued habitats in the District, the overall ecological network is important for biodiversity as a whole, helps to support the health designated sites, and allows species to migrate in response to climate change. Fragmentation and erosion of habitats and the wider ecological network is an ongoing threat to biodiversity.</p>	<p>Erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. In addition, Policy 31 of the HDPF requires development proposals to contribute to the enhancement of existing biodiversity, and to create and manage new habitats where appropriate. The policy also supports development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks. The Local Plan Review provides the opportunity to ensure that the policy is working as planned and is up-to-date with current thinking and evidence.</p>	<p>SA objective 6 SA objective 15</p>

Historic Environment

- A.61 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. It is also home to a number of Listed Buildings from the Jacobean, Georgian and Victorian era and the 20th Century.

A.62 There are over 1,860 Listed Buildings in the District together with 37 Conservation Areas, 77 Scheduled Ancient Monuments and 252 sites of archaeological interest. 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. Twelve of the conservation areas have adopted character statements. These highlight the broad character of the area as well as the features which contribute to the special character of these areas and should be preserved or enhanced. Conservation Areas in Horsham which have adopted character statements include; Amberley, Billingshurst, Bramber, Henfield, Horsham (London Road, Richmond Road and Horsham Town Centre), Pulborough, Slinfold, Steyning, Storrington and Warnham. 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.

A.63 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 as well as one historic structure, two places of worship and two archaeological sites. Preservation works to these structures are actively encouraged by the Council, and would be given priority for renovation works¹¹⁵. Horsham in comparison with other local planning authorities in West Sussex, has the second highest number of assets on the Heritage at Risk Register, after South Downs National Park¹¹⁶.

Table 0.7 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

¹¹⁵ 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

¹¹⁶ Historic England (2021) Heritage at Risk London & South East Register [Online] Available at: <https://historicengland.org.uk/images-books/publications/har-2021-registers/lon-se-har-register2021/>

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>There are many sites, features and areas of historical and cultural interest in the District, some of which are at risk and identified on the Heritage at Risk Register. These assets may be particularly vulnerable to development which is poorly located or designed.</p>	<p>The HDPF includes policies seeking to protect and enhance the historic environment, including Policy 34, which requires the Council to positively manage development affecting heritage assets. The Local Plan Review presents the opportunity to guide new development to locations which are less sensitive in terms of their impact on heritage assets (with consideration for other sustainability issues) through the SA process applied to potential site allocations. The Local Plan Review will allow for any update required to be made to the policy position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.</p>	<p>SA objective 8</p>

Landscape

- A.64 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 woodlands¹¹⁷.
- A.65 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

¹¹⁷ 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

District, around Horsham town and Crawley, and major transport corridors across the District act to influence parts of Horsham¹¹⁸.

- A.66 The Horsham District Landscape Character Assessment 2003 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.
- A.67 Areas identified as having low sensitivity to development were generally areas that had already experienced a high level of development. Issues likely to contribute to the possible change of landscape character include tall structures, declining land management, increased traffic, suburbanisation in rural areas, engineered flood defences and large scale development.
- A.68 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).

¹¹⁸ 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

- Minor River Valleys (Narrow alluvial floodplain)¹¹⁹.

- A.69 The findings of the Horsham District Landscape Character Assessment were built upon by the Council through the Landscape Capacity Study¹²⁰ which also drew on working from the West Sussex Landscape Character Assessment, South Downs Integrated Landscape Character Assessment and historic landscape characterisation data for West Sussex County Council. It was found that even at land which is very close to the settlement edges many landscapes are sensitive to development. Much of the landscape in Horsham is also in good condition, and strongly rural in character thereby making increasing its sensitivity to change. Land within a number of landscape character areas in the District also play an important role in terms of maintaining separation between these settlements. This includes land between Horsham and Crawley, Horsham and Southwater and between Storrington and West Chiltington Common.
- A.70 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.
- A.71 6.77% of land within Horsham is located within the High Weald AONB¹²¹. 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 2020-2022 reporting period and identified that there were 269 planning application consultations received from local authorities across the AONB during this period¹²².

¹¹⁹ 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

¹²⁰ Horsham District Landscape Capacity Study (2014) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0009/31896/Landscape-Capacity-Study2014.pdf

¹²¹ 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>

Appendix B: Summary of Consultation comments on the SA Scoping Report

Horsham District Council undertook a five-week period of consultation on the SA Scoping Report on 3rd September 2019, with neighbouring authorities 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	<p>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.</p> <p>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.</p>	Comment noted – the SA Report presents an update baseline in Appendix A 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	<p>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.</p> <p>The following updates are suggested:</p> <p>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</p>	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.

		<p>achieve net gain.</p> <p>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.</p>	
Consultee	Representation relating to	Comment	SA Team Response
		<p>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.</p>	
Natural England	Plans, policies or programmes	<p>Natural England has not reviewed the plans listed but recommends that the following types of plans are considered:</p> <ul style="list-style-type: none"> – Green infrastructure strategies – Biodiversity plans – Rights of Way Improvement Plans – Shoreline management plans – Coastal access plans – River basin management plans – AONB and National Park management plans. – Relevant landscape plans and strategies 	<p>Comment noted - the SA Report includes the update baseline and policy context in Appendix A.</p>
	SA Framework	<p>Natural England agree that the SA framework is appropriate.</p>	<p>Comment noted.</p>

Historic England	Baseline	<p>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.</p> <p>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.</p>	<p>Comment noted - the SA Report presents an updated baseline in Appendix A which now includes further detail in relation to the historic environment in Horsham District.</p>
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Appendix C: Equalities Impact Assessment of the Horsham District Local Plan, January 2024

- C.1 This report presents the findings of an assessment of the likely effects on equalities issues of the Regulation 19 Horsham District Local Plan 2023.
- C.2 The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010 but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- C.3 In fulfilling this duty, it is useful to produce a written record documenting how equalities issues having been specifically considered and that is the purpose of this report.
- C.4 The Equality Act 2010 identifies nine '*protected characteristics*' and seeks to protect people from discrimination on the basis of these. They are:
1. Age
 2. Disability
 3. Gender reassignment
 4. Marriage and civil partnership
 5. Pregnancy and maternity
 6. Race
 7. Religion or belief
 8. Sex
 9. Sexual orientation
- C.5 There are three main duties set out in the Equality Act 2010¹²³, 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.

¹²³ Section 149(1) of the Equality Act 2010 .

The Regulation 19 Horsham District Local Plan

- C.6 The Regulation 19 Horsham District Local Plan (January 2024), sets out a vision and objectives for Horsham District together with 46 land use policies and 21 policies allocating large scale and small-scale site for development.
- C.7 The purpose of the Horsham District Local Plan is to guide development up to 2040. Because strategic planning is only one function of Horsham District Council, it is not expected that the Local Plan alone would address all of the duties of the Equalities Act.

Baseline Information

- C.8 The Regulation 19 Draft Horsham Local Plan (January 2024) and accompanying SA/SEA Report, 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-2021 was 147,487 compared to the 2011 Census, when 131,301 people lived in the District, across 54,900 households. The population is split between 75,471 females and 72,016 males¹²⁴.
 - Of the population in Horsham, 93.6% are white. The remaining population is split between a number of ethnic minority groups, including Asian (2.7%) Black (0.9%) and a further 2.1% from mixed or multiple ethnic groups.
 - 51.8% of Horsham's total population are religious. The majority are Christian (49.3%), Muslim (0.9%), Buddhist (0.4%), Hindu (0.6%) and Jewish (0.2%). 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 (7.95).¹²⁵
 - According to 2021 estimates, 59.4% of the population is aged between 16 and 64. From the recent estimates available of the population that is aged 16 and over, 29.6% are single, 52.5% are married of those 0.4% are living in a same-sex couple (married or in a civil partnership). A further 1.9% are separated but are still legally married or in a same-sex civil partnership). The remaining 16% are either divorced, widowed, or formerly in a same-sex civil partnership.¹²⁶
 - Horsham has an older age profile in comparison to England, with 22.8% of the population ages 65 years and over. The average age in Horsham according to Census

¹²⁴ ONS (2021) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland: Mid-2021 [Online] Available: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesScotlandandNorthernIreland>

¹²⁵ ONS (2021) Horsham [Online] Available: <https://www.ons.gov.uk/census/maps/choropleth/identity?Itla=E07000227&lad=E07000227>

¹²⁶ ONS (2021) Horsham Available [Online] <https://www.ons.gov.uk/census/maps/choropleth/population?Itla=E07000227&lad=E07000227>

2021 data is 45 years³.

- The 2021 Census statistics suggest that health in the District is reasonably good with 86.5% of the population reporting themselves to be in very good, or good health. Some 10.2% state they are in fair health, with only 2.5% and 0.7% in bad or very bad health respectively. The health of the District has improved since the 2018 estimates.¹²⁷
- Horsham's Health Index score increased in 2021. Horsham has an overall Health Index score of 121.9, which is up 4.2 points compared with the previous year. A score of 100 represents average levels of health in England in 2015. A higher number always means better health and a lower number means worse health. Horsham ranked in the top 10 percent of local authority areas in England for health in 2021.¹²⁸
- In 2021, 5.0% of Horsham residents were identified as being disabled and limited a lot. This figure decreased from 5.8% in 2011¹²⁹. In 2021, just over 1 in 11 people (9.1%) were identified as being disabled and limited a little, compared with 8.6% in 2011. The proportion of Horsham residents who were not disabled increased from 85.6% to 85.9%. The decrease in the proportion of residents who were identified as being disabled and limited a lot in Horsham (0.8 percentage points) was similar to the decrease across the South East (1.0 percentage points, from 7.2% to 6.2%). Across England, the proportion fell by 1.6 percentage points, from 9.1% to 7.5%.
- According to the 2021 Census Data 91.1% of the population in the Horsham District are economically active. This compares with 78.8% in the whole of Great Britain. 94.4% of males are economically active in the Horsham District compared to 87.9% of females. This compares to 82.0% and 79.4% respectively for the rest of the UK¹³⁰.
- When considering all Indices of Deprivation (2019), the District of Horsham is ranked 290th out of 317 local authority areas where 1 is the most deprived. This position has fallen from 299 in 2015 and 304 in 2010.¹³¹
- 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%¹³². These figures are reflective of household income, household energy requirements and fuel prices in a given area.
- There is little baseline information available that is directly relevant to other protected characteristics including gender reassignment, or sexual orientation other than what is referenced above.

¹²⁷ ONE (2021) Horsham Available [Online] <https://www.ons.gov.uk/census/maps/choropleth/health/general-health-age-standardised/health-in-general/very-bad-health?lta=E07000227&lad=E07000227>

¹²⁸

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/articles/howhealthhaschangedinyourarea2015to2021/2023-06-16#E07000227>

¹²⁹ These are age-standardised proportions. Age standardised proportions are used throughout this section. They enable comparisons between populations over time and across geographies, as they account for differences in the population size and age structure.

¹³⁰ NOMIS – Local Area Report (2011) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx>

¹³¹ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

¹³² <https://lginform.local.gov.uk/reports/lgastandard?mod-area=E07000227&mod-group=E10000032&mod-metric=2131&mod-type=namedComparisonGroup&mod-period=1&mod-groupType=area>

Method

- C.9 The Regulation 19 Horsham District Local Plan has been reviewed to consider the likely impacts of the 46 land use policies and 21 site allocation policies on each of the *nine protected characteristics* from the Equality Act 2010 listed above. For each protected characteristic, consideration has been given to whether the options considered for inclusion in the Local Plan are compatible or incompatible with the *three main duties* of the Equality Act 2010.
- C.10 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 or unknown
-	Negative

- C.11 Note that the criteria applied to the appraisal of site options as part of the EqIA differs from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main SA Report. As such the effects identified cannot be compared between the two assessments.
- C.12 The purpose of this assessment is to ensure that the local plan policies are providing equality of opportunity and eliminating unlawful discrimination for everyone. The Council takes account of the needs, circumstances and experiences of those in the community who it intend to benefit from a policy.

Findings

- C.13 The detailed findings of the EqIA for the 46 land use policies are presented in Table 1 overleaf, while Table 2 presents the findings of the EqIA on the 21 site allocation policies. All policies have been shown to have either a positive, mixed or neutral effect in relation to all of the protected characteristics considered in this assessment. The document is therefore considered to be generally compatible with the three main duties of the Equality Act 2010.

Findings for the policies in the Local Plan

- C.14 Policies which seek to address the provision of community services and facilities in the District, seek to support development that enhances community access to these facilities, or prevent development that would limit access to these facilities (Policies 2, 3, 4, 5, 11, 12, 14, 15, 19, 20, 27, 28, 35, HA1 and 41) are all expected to result in a positive effect in relation to the protected characteristics of **pregnancy and maternity, sexual orientation and religion or belief**. These policies are likely to contribute to the development of, and convenient access to, community facilities that could support meetings related to the LGBTQ+ community, pregnancy or maternity and faith groups in the District.
- C.15 Policies 2 and 3 support development 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, they may allow for development in smaller secondary settlements, outside the main built-up areas where there is more access to services and facilities. These central services and facilities might otherwise have benefit these protected groups and so in some instances residents in the smaller secondary settlements may have reduced access to community services and facilities.
- C.16 Policy 39 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 pregnant 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.
- C.17 Policies 15 and Policy 16 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.
- C.18 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. The mix of uses on site would also advance equality for the protected characteristics of maternity by providing a range of services and facilities in one location. Improvements to accessibility could also benefit parents with prams. Policy 5 has the potential to have a positive effect on the protected characteristic **disability** provided that the connections between place

make provisions for those in wheelchairs, the blind and deaf.

- C.19 The level of housing to be delivered over the plan period is set out through Policy 37. Delivering higher levels of development over the plan period is likely to respond more favourably to addressing housing affordability in the plan area. This is to be of particular benefit to young people wishing to get on the housing ladder. Policies that seek to ensure the provision of a range of housing sizes and types for specific groups of the community (Policies 38,39,40 and 42,) 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**.
- C.20 Housing suitable for people with disabilities is supported through a number of policies including Policy 18 ((the provision of housing suitable for wheelchair users), Policy 20, (the delivery of retirement homes and specialist care housing) and Policy 23, (support for annexes to properties that can be used by elderly family members or for staff supporting a dependent or family member). These three policies are expected to have a positive effect on the protected characteristic of disability, with Policy 23 also having a positive effect on age.
- C.21 The Local Plan also includes policies which specifically seek to address the accommodation needs of Gypsies and Travellers. Policy 27 sets out that development must meet the 'specific needs of minority groups within the District, including Gypsies and Travellers and Policy 43 acknowledges that the Council will meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. As such, both policies are expected to have a positive effect in relation to the protected characteristic of race.
- C.22 Certain groups in the District are likely to be particularly vulnerable to air pollution. This includes younger and older people, people with cardiovascular or respiratory problems as well as pregnant women. Policies 11 and 12, require the minimisation of air pollution in the District in order to protect human health. This is required through Policy 12 through the use of appropriate mitigation measures such as the implementation of local Air Quality Action Plans, minimisation of traffic measures, the use of cleaner fuels and electric car charging points. These policies are therefore likely to have a positive effect in relation to **age, disability and pregnancy and maternity**.
- C.23 Ensuring that appropriate parking is provided at developments in the District will have benefits for groups who are likely to experience mobility issues. This is supported through Policy 25 and therefore this policy is expected to have a positive effect in relation to **age and disability**.

- C.24 Policy 27 (Inclusive Communities, Health and Wellbeing) is likely to benefit all of the protected characteristics in the District. This policy seeks to address the requirements of all members of the community in new development. This includes the specific needs of older and younger people, minority groups, faiths and other community groups within the district. Furthermore, development is required by this policy to be designed to achieve healthy, inclusive and safe places.
- C.25 Strategic Policies 19 and 20 seek to guide development require new development to be inclusive, 'meeting the needs of all users, with particular consideration given to disability, age and gender, as well as addressing the needs of parents'. The policies are expected to have a positive impact on the protected characteristics of **age, disability, gender, pregnancy and maternity and sexual orientation**. However, a negative impact may result on those going through **gender reassignment** if this protected characteristic is not considered in detailed design elements such as toilet provision.

Findings for the site allocations considered in the Local Plan

- C.26 The large sites being considered for allocation are located at variable locations in relation to the areas of strongest service provision. In general, the sites being considered as urban extensions to larger settlements would provide residents with access to community facilities which might benefit the protected characteristics of **pregnancy and maternity, race and religion or belief**. Sites which are to be provided at smaller settlements would provide more limited access to existing community facilities. As such, overall, the large site options considered are expected to have a mixed (positive and negative) effect in relation to these protected characteristics.
- C.27 It is expected that the large sites options would deliver development in line with development principles for strategic sites as set out in Policy 20. 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, **disability, pregnancy and maternity and sexual orientation**. 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, race and religion or belief**.

- C.28 Small site options that are located within close proximity of the Main Town (Horsham town) or the Small Town and Larger 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 **age, pregnancy and maternity and religion or belief**. Sites which include housing that are not located within or at the edge of these settlements are less likely to provide access to such services and facilities. Therefore, the allocation of these site options may have an adverse impact in relation to these protected characteristics. A combined positive and negative impact has subsequently been recorded for these protected characteristics.
- C.29 Policy 38 and Policy 39 are expected to help ensure that housing is provided in the District to meet the needs of younger and older people as well as to meet the needs of people with disabilities. As such, the allocation of small site options which provide residential use may result in additional benefits in relation to **age and disability**.

Consultation on the Local Plan

- C.30 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.
- C.31 To ensure all groups of people have had opportunity to comment on the development of the Local Plan, the Council utilised its stakeholder database to notify of the start of the consultation (at the time of writing, 5,910 contacts are on this list). In total 6,320 comments were received on the consultation from 3,352 respondents. Respondents included groups and organisations representing those with protected characteristics.
- C.32 To ensure that the consultation was made as accessible as possible, in addition to contacting all those who had signed up to receive notifications for the Local Plan, the Council undertook the following activities:
- Parish Council Workshops – of which 28 out of the 35 Parish/Neighbourhood Councils attended
 - Public Exhibitions – 6 events held throughout the district available for all members of the public to attend (estimated that over 1,000 people attended)
 - Distribution of consultation material, leaflets and exhibition boards to libraries.
 - Adverts in District Post and West Sussex County Times to notify of consultation

- Use of Council's Facebook and Twitter accounts to publicise the consultation
- C.33 Production of YouTube videos to explain different elements of the consultation document and why a Local Plan is needed.

Table 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
Chapter 4: 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	+	+	+
Policy 5 – Broadbridge Heath Quadrant	+	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, the ageing population and sexual orientation**. There is potential for isolation amongst the ageing population, 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, sex, sexual orientation and age**.

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 more elderly residents in the District. The policy will also have a positive impact on **pregnancy and maternity** as improved pedestrian and cycle connections will be easier to navigate with a pram. Policy 5 has the potential to have a positive effect on the protected characteristic disability provided that the connections between place make provisions for those in wheelchairs, the blind and deaf.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 5: Climate Change and Water									
Policy 6 – Climate Change	0	0	0	0	0	0	0	0	0
Policy 7 – Appropriate Energy Use	0	0	0	0	0	0	0	0	0
Policy 8 – Sustainable Design and Construction	0	0	0	0	0	0	0	0	0
Policy 9: Water Neutrality	0	0	0	0	0	0	0	0	0
Policy 10 - Flooding	0	0	0	0	0	0	0	0	0
Policies 6 to 10 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.									

Chapter 6: Conserving and Enhancing the Natural Environment

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 11– Environmental protection	+	+	0	0	+	0	0	0	0
Policy 12 – Air Quality	+	+	0	0	+	0	0	0	0
Policy 13 – The Natural Environment and Landscape Character	0	0	0	0	0	0	0	0	0
Policy 14 – Countryside Protection	0	0	0	0	+	0	+	0	0
Policy 15 – Settlement Coalescence	0	0	0	0	+	0	+	0	0
Policy 16 – Protected Landscapes	0	0	0	0	0	0	0	0	0

Policy 17 – Green Infrastructure and Biodiversity	0	0	0	0	0	0	0	0	0
Policy 18 – Local Greenspace	0	0	0	0	0	0	0	0	0

Elderly, and younger residents can be the more susceptible to poor air quality than other groups of people in the District. People with disabilities relating to cardiovascular and respiratory conditions and pregnant women are also particularly vulnerable to air pollution. As such, a positive effect is identified for Policies 11 and 12 in relation to **age, disability** and **pregnancy and maternity**. Policy 11 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 12. 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 14 and Policy 15 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**.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 7: Development Quality, Design and Heritage									
Policy 19 – Development Quality	+	+	?	0	+	0	+	0	+
Policy 20 – Development Principles	+	+	?	0	+		+		+
Policy 21 – Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	0	0	0	0
Policy 22 – Shop Fronts and Advertisements	0	0	0	0	0	0	0	0	0
<p>Policy 19 seeks high quality and inclusive design for all development in the District. It is specifically seeking to ensure that developments are accessible and safe, and also that a framework of high quality open spaces are provided to meet the identified needs of the community. These well designed, safe and accessible open spaces have the potential to address the requirements of all members of the community, including the specific needs of older and younger people, minority groups, faith and other community organisations. As such, a positive effect is identified in relation to age, disability, pregnancy and maternity, religion or belief and sexual orientation. A negative impact may result on those going through gender reassignment if this protected characteristic is not considered in detailed design elements such as toilet provision therefore a ? has been recorded against this protected characteristic.</p>									

Strategic Policy 20 seeks to guide development in the district and criterion 11 requires that all development be inclusive, meeting the needs of all users, with particular consideration given to disability, age and gender, as well as addressing the needs of parents. The policy is subsequently expected to have a positive impact on the protected characteristics of **age, disability, gender, pregnancy and maternity and sexual orientation**. Again a negative impact may result on those going through **gender reassignment** if this protected characteristic is not considered in detailed design elements such as toilet provision.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 8 : Infrastructure, Transport and Healthy Communities									
Policy 23 – Infrastructure Provision	0	0	0	0	0	0	0	0	0
Policy 24 – Sustainable Transport	0	0	0	0	0	0	0	0	0
Policy 25 - Parking	+	+	0	0	0	0	0	0	0
Policy 26 – Gatwick Airport Safeguarded Land	0	0	0	0	0	0	0	0	0
Strategic Policy 27– Inclusive Communities, Health and Wellbeing	+	+	+	+	+	+	+	+	+
Policy 28 – Community Facilities, Leisure and Recreation	0	0	0	0	+	0	+	0	0

Older people and members of the community with disabilities are particularly likely to benefit from the provision of safe and convenient parking that improves access to Horsham's town centers and other built-up areas. As such, Policy 25 is likely to have a positive effect in relation to **age** and **disability**.

Policy 27 is likely to have a positive effect in relation to all of the protected characteristics. This policy seeks to ensure developments address the requirements of all members of the community in new development, including the specific needs of older and younger people, minority groups, faith and other community groups within the district. Development is required by this policy to be designed to be healthy, inclusive and safe to meet the long-term needs of a range of occupiers.

The provision of new or improved community facilities and services will contribute to providing buildings that benefit specific groups of the community. This type of provision is likely to provide space for meetings for pregnant women and/or faith groups in the area. As such, Policy 28 is expected to have a positive effect in relation to **pregnancy and maternity** and **religion or belief**.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 9: Economic Development									
Policy 29 – New Employment	0	0	?	0	0	0	0	0	0
Policy 30 – Enhancing Existing Employment	0	0	0	0	0	0	0	0	0
Policy 31– Rural Economic Development	0	0	0	0	0	0	0	0	0
Policy 32 – Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses	0	0	0	0	0	0	0	0	0
Policy 33 – Equestrian Development	0	0	0	0	0	0	0	0	0
Policy 34 – Tourism Facilities and Visitor Accommodation	0	0	0	0	0	0	0	0	0

Policy 35 – Town Centre Hierarchy and Sequential Approach	0	0	0	0	+	0	+	0	0
Policy 36 – Town Centre Uses	0	0	0	0	0	0	0	0	0

Policy 35 supports development that will contribute to the vitality and viability of town centres by set out a town centre first approach with main town centre uses to be encouraged at these locations. These locations are noted to be the most accessible in the District. There is potential for the policy to have a positive effect in terms of resident’s ability to access services relevant to **pregnancy and maternity** and **religion or belief**. Specifically, benefits may occur through improved access to community spaces that facilitate meetings, classes and activities or places of worship.

There is potential to positively impact those going through gender reassignment if this is considered when designing the workplace. Equally there is potential to negatively impact this protected characteristic if this design consideration is omitted. As such a ? has been recorded **for gender reassignment** for policies 29 and 32.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Housing (inc Allocations)									
Policy 37 – Housing Provision	?	0	0	0	0	0	0	0	0
Policy HA1 – Strategic Site Development Principles	+	0	0	0	+	+	+	0	0
Policy 38 – Meeting Local Housing Needs	+	0	0	0	0	0	0	0	0
Policy 39 – Affordable Housing	+	0	0	0	+/-	0	+/-	0	0
Policy 40 – Improving Housing Standards in the District	+	+	0	0	0	0	0	0	0
Policy 41 – Rural Exception Homes	0	0	0	0	+/-	0	+/-	0	0
Policy 42 – Retirement Housing and Specialist Care	+	+	0	0	0	0	0	0	0

Policy 43 – Gypsy and Traveller Accommodation n	0	0	0	0	0	+	0	0	0
Policy 44 – Rural Workers' Accommodation	0	0	0	0	0	0	0	0	0
Policy 45 – Replacement Dwellings and House Extensions in the Countryside	0	0	0	0	0	0	0	0	0
Policy 46 – Ancillary Accommodation	+	+	0	0	0	0	0	0	0

Policy 37 sets out options for the quantum of housing to be provided over the plan period. Requirements for how new housing should be provided in terms achieving an appropriate mix and high standard of housing are set out through the remaining policies in the 'Housing' chapter of the Local Plan. Requiring a higher level of growth over the plan period is likely to address housing affordability in a more positive manner. This could be of particular benefit to younger people wishing to get on the housing ladder. Given that the level of housing to be provided over the plan period is currently undecided the effect of this policy in relation to **age** is uncertain.

Policy 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 deliver supporting services and facilities which is to include community buildings. As such, a positive effect is identified for this policy in relation to **age, pregnancy and maternity, race and religion or belief**.

Policy 38 seeks to support development that will provide a mix of housing sizes and types. Delivering an appropriate mix of housing is expected to help meet the needs of younger people seeking to buy their first home as well as the needs of housing needs of an increasingly elderly population. Therefore, a positive effect is identified in relation to **age**.

Policy 39 sets the councils thresholds for affordable housing to ensure housing remains affordable for those who cannot compete in the housing market. Delivering affordable housing is expected to help meet the needs of younger people seeking to buy their first home as well as the needs of housing needs of an increasingly elderly population. Therefore, a positive effect is identified in relation to age. This policy may also help to ensure the provision of community services to support pregnant 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**.

Policies 40, 42 and 46 also include provisions that will benefit the residential needs of elderly and disabled people in the District. Policy 40 requires that new development meets housing standards that will ensure that there is delivery of homes that are suitable for wheelchair users; Policy 42 supports the delivery of retirement homes and specialist care housing; and Policy 46 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**.

Policy 41 supports the delivery of affordable housing in rural areas in exceptional circumstances where there is an identified local need for homes. The policy may result in a mixed effect (positive and negative) in relation to **pregnancy and maternity** and **religion or belief**. Support for this type of development is encouraged where the need is from people whose work provides important services to residents in the parish. This could support the functioning of community services at more rural locations, allowing for benefits in relation to groups such as pregnant women or faith groups. However, the delivery of housing outside of larger settlements may result in people living in locations where they have poor access to places of worship and/or community buildings which support meetings/services related to **pregnancy and maternity**.

A positive effect is identified for Policy 43 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.

Table 2 Likely effects of the Large sites allocations 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
Strategic sites	+	0	0	0	+	0	+	0	0
<p>The large sites considered for allocation through the Local Plan are at variable locations in the District in relation to existing services and facilities. This includes community facilities which provide space for meetings relating to pregnancy and maternity and faith groups. The large scale allocations are being provided as urban extensions to existing settlements (West of Ifield, East of Billingshurst, and West of Southwater) and as such would provide more immediate access to existing provisions. As such a positive effect has been recorded in relation to age, pregnancy and maternity and religion or belief.</p> <p>Development at large sites should be in line with Policy HA1 (Strategic Site Development Principles) meaning they should include the delivery of services and facilities that ensure the successful functioning of these sites. These provisions could include new space for meetings relating to pregnancy or maternity, the LGBTQ+ community 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, sexual orientation, race and religion or belief.</p>									
Small sites	+/-	+	0	0	+/-	0	+/-	0	0

Small site options that are located within close proximity to Horsham town or the Small Town and Larger Villages of the District should provide a good level of access to community services and facilities. Premises such as community halls for example might be used for meetings, classes and activities, thereby providing support and reducing isolation for parents or the elderly. 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 of the District provide access to good range of services and facilities. As such a positive effect has been identified for allocations in the following settlements: Broadbridge Heath, Horsham, Henfield, Pulborough, Steyning and Storrington and Sullington.

Sites that include housing which are not located within or at settlement edge of the Main Town (Horsham town) or Small Towns and Larger Villages of the District are less likely to provide access to services and facilities, meaning whilst there may be some benefit, allocation of the sites in Ashington, Barns Green, Cowfold, Rusper, Partridge Green, Rudgwick, Lower Beeding, Small Dole, Thakeham, Warnham and West Chiltington may have an adverse impact in relation to the protected characteristics of **age, pregnancy and maternity and religion and belief**.

As such a mixed positive / negative effect is expected for the small sites in relation to **age, pregnancy and maternity and religion or belief**.

** The development of new homes in the District would be in line with Policy 17 (Housing Mix) and Policy 19 (Improving Housing Standards in the District) which will help to ensure that housing to meet the needs of younger and older people as well as people with disabilities. As such, the allocation of these sites may result in additional benefits in relation to **age and disability**.

** Note that the criteria applied to the appraisal of sites as part of the EqIA differs from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main SA Report and therefore the effects identified are not the same between the two assessments.*

Conclusion

- C.34 The EqIA has examined whether the Horsham Regulation 19 Horsham District Local Plan 2023 has an adverse impact on or discriminated against different groups in the community with specific consideration to groups identified under the nine protected characteristic as identified in the Equalities Act 2010.
- C.35 The assessment identified that all policies within the Local Plan are likely to have either a positive, mixed positive and negative or neutral impact on the protected characteristics. No adverse impacts have been identified meaning it is not necessary to move further into the EqIA Process and require action planning. The identified benefits will also have benefits for the wider community.
- C.36 Based on the judgements made in the EqIA, it is not considered that any measures are required to mitigate against any adverse impacts. Due regard has been given to the three aims expressed in paragraph 149 of the Equalities Act and it is considered that the plan will work to eliminate discrimination by including policies that are inclusive, provide equal opportunity for all and foster good relations between persons where possible within the remits of Local planning.
- C.37 The Council will monitor the implementation and impact of the Local Plan policies through the production of its Annual Monitoring Report (AMR).