

**Horsham District Council**

# **Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan (Non-Technical Summary) Regulation 18 Consultation**

**Final Report**

Prepared by LUC

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## Horsham District Council

### Interim Sustainability Appraisal of Growth Options: Horsham District Local Plan (Non-Technical Summary) Regulation 18 Consultation

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## Non-technical summary

This report sets out the findings of the Sustainability Appraisal of the growth options for the Horsham Local Plan Review. It focuses on where the Council has key decisions to make – how much housing and employment growth, and where the growth should take place.

### Introduction

**1.1** LUC has been commissioned to carry out a Sustainability Appraisal (SA) of the Local Plan Review for Horsham. SA is a legal requirement and plays an important role in the plan preparation process. The SA helps to identify and evaluate the sustainability pros and cons of alternative spatial strategies, policies and site allocations in order to enable the Council to come to decisions about which approach to adopt.

### Key decisions for the Local Plan Review

**1.2** When preparing a Local Plan, perhaps the most critical decisions that the Council has to make with respect to the Local Plan Review are how much growth, in particular housing and employment growth, together with supporting infrastructure, needs to be accommodated in the District, and where this growth should take place.

**1.3** LUC has therefore carried out a series of SA work relating to the options thus far considered. The findings are presented in this report. It focuses on:

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

**1.4** The report is presented alongside the Interim SA Report for the Regulation 18 Local Plan which details the SA findings for the policies in the Regulation 18 Local Plan. Together

these two SA Reports comprise the Environmental Report for this stage of the plan-making process. They should be read together with the Regulation 18 Local Plan itself.

### SA Framework

**1.5** For each component of work, the options have been appraised against a series of SA objectives, which together comprise the 'SA Framework'. Each SA objective addresses a different sustainability issue – covering economic, environmental and social issues – and the purpose of SA is to come to judgements about whether an option will have a positive or negative effect against the SA objective, and how significant the effect might be.

#### The SA Framework objectives

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 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.

1.6 The key for the symbols used in the SA are shown below.

**Key to symbols used in the SA**

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

**SA of spatial strategy options**

1.7 A starting point for the Local Plan Review is for the Council to consider, in high level terms, the overall spatial strategy options for the distribution of development, taking into account the current settlement pattern and the relationship of Horsham with surrounding areas.

1.8 Six overall strategy options were identified by the Council, and each has been subject to SA:

- **Option 1:** Existing settlement hierarchy strategy (bring forward existing development strategy)

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

- **Option 2:** Proportionate growth strategy

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

- **Option 3:** New garden towns

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

- **Option 4:** New urban extensions

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

- **Option 5:** Employment strategy

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

- **Option 6:** Sustainable transport strategy

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

**Summary of findings**

1.9 The SA ‘scores’ for each of the spatial strategy options is shown in the table below. In summary, although the differences are not that great, those options that focus development in accordance with the existing settlement hierarchy either within settlements (Option 1), or as urban extensions to the main settlements within the District or adjacent to Crawley (Option 4), tend to perform better than a more dispersed approach (Option 2). However, there are some merits to new settlements (Option 3), an employment-led strategy (Option 5), and focusing on sustainable transport nodes (Option 6).

1.10 The actual effects of overall strategy options will depend heavily upon the precise location and scale of development, the quality of design and the delivery of supporting infrastructure. As such, the results of this high level assessment should be treated with a considerable degree of caution.

Table 1.1 Summary of Likely Sustainability Effects for the Overall Strategy Options for Horsham Local Plan

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

## SA of quantum of growth options

**1.11** In addition to the six overall strategy options, the Council is also considering three different quanta of growth for the Local Plan. Each of the three quantum options (lower growth, medium growth and higher growth) consider the level of housing and employment growth which would be provided in the District over the plan period. These are:

- **Quantum option 1:** Lower growth - 1,000 dpa (17,000 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) 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 emerging 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 emerging 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

*The approximate maximum level of housing growth if the District was to accept significant 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 emerging Economic Growth Assessment total to reflect the higher housing growth option*

### Summary of findings

**1.12** In general, providing a higher level of growth over the plan period would require a higher amount of greenfield land take, which could have a range of environmental impacts. The delivery of a higher amount of growth could also place more development in closer proximity to sensitive environmental receptors, higher value landscapes and heritage assets.

**1.13** It is also expected that an approach which includes a higher amount of development would significantly increase the number of private vehicle journeys being made regularly, which is likely to be to the detriment of air quality and the District's contribution to climate change.

**1.14** In contrast allowing for higher growth could support new service provision as well the viability of sustainable transport links in Horsham.

**1.15** It would also be likely to deliver benefits in relation to addressing housing affordability in the plan area as well as contributing to the housing need of neighbouring local authority areas.

Table 1.2 Summary of likely sustainability effects for the growth quantum options

SA Objective	Quantum Option 1: Lower growth	Quantum Option 2: Medium growth	Quantum Option 3: Higher growth
SA Objective 1: Housing	+	++?	++
SA Objective 2: Access to services/facilities	+?	++?	++/-?
SA Objective 3: Inclusive Communities	+	+	+/-?
SA Objective 4: Crime	0?	0?	0?
SA Objective 5: Health and wellbeing	+	+	+/-?
SA Objective 6: Biodiversity	-	--	--
SA Objective 7: Landscape	-	--	--

SA Objective	Quantum Option 1: Lower growth	Quantum Option 2: Medium growth	Quantum Option 3: Higher growth
SA Objective 8: Historic environment	--	--	--
SA Objective 9: Soil quality	--?	--?	--?
SA Objective 10: Mineral resources	--?	--?	--?
SA Objective 11: Water resources	-?	-?	-?
SA Objective 12: Flooding	-	--	--
SA Objective 13: Travel	+/-?	+/-?	++/--?
SA Objective 14: Air pollution	+/-?	+/-?	--/+?
SA Objective 15: Climate change	+/-?	+/-?	++/--?
SA Objective 16: Economic growth	+	+/-	++/-
SA Objective 17: Access to employment opportunities	+	+	++/-

### SA of large site options

**1.16** The Council has considered ten large site options as part of the Local Plan review. It should be noted that the Land West of Ifield (SA101) and West of Kilnwood Vale (SA291) are presented together in the draft Horsham District Local Plan (Regulation 18) as a single larger strategic site 'Land West of Crawley', however for the purposes of this stage of the SA they have been considered separately to allow a more fine-grained analysis. These are sites which can make a significant contribution to the future housing needs of the District. The sites comprise a mix of urban extensions and new settlement proposals.

**1.17** In addition to these ten site options, the Ashington cluster site has been appraised in a similar level of detail considering the high amount of development which could be provided at the site. This also reflects that delivery of some parcels is 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.

**1.18** The large site options appraised are as follows:

- Site SA101: Land West of Ifield (urban extension)
- Site SA118: Land East of Billingshurst (urban extension)

- Site SA119: West of Southwater (urban extension)
- Site SA291: West of Kilnwood Vale (urban extension)
- Site SA394: Rookwood (urban extension)
- Site SA414: Land North East of Henfield (Mayfield) (new settlement)
- Site SA459/SA674/SA846: Land East of Kingsfold (urban extension)
- Site SA597: Adversane / Land at Steepwood Farm (new settlement)
- Site SA716: Buck Barn / Land at Newhouse Farm, West Grinstead (new settlement)
- Site SA744(includes SA225)/SA668: West of Billingshurst (urban extension)
- Site SA085/SA520/SA524/SA539/SA790: Ashington cluster (cluster of sites forming one large site)

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



## Summary of findings

**1.20** With the exception of the Ashington cluster, all the large sites are expected to have a positive effect in relation to **SA objective 1: housing**. The sites at West of Ifield and Kilnwood Vale are in close proximity to the boundary with Crawley and could potentially contribute to the unmet housing need within that local authority.

**1.21** The sites at West of Ifield, Rookwood, North East of Henfield (Mayfield), Adversane, Buck Barn and West of Billingshurst would deliver a substantial number of new homes over the plan period. These sites could also potentially deliver a high number of new homes in the longer term beyond the plan period given their capacity.

**1.22** A positive effect is expected for all large sites considered in relation to **SA objective 2: access to services and facilities**. Many of the large site options (most notably the urban extensions) would provide access to existing services and facilities within the larger settlements. Proposals for many of the large site options also include the delivery of new services and facilities. A significant positive effect alone has been identified for West of Ifield, West of Southwater and Rookwood, as they are located within walking distance of an existing settlement (Crawley, Southwater and Horsham town, respectively) and existing services and facilities, and would also deliver additional services and facilities of a more substantial scale. The positive effect expected for the East of Billingshurst site is only expected to be minor. Although this site is in close proximity to the built-up area boundary of this settlement and services and facilities here, the proposals for new service at the site are less substantial than those expected at new settlement sites and many of the other urban extensions. This site would not include a new neighbourhood centre and essential service provision would be more limited with contributions secured towards a primary school and health facilities. For most of the other sites a mixed effect has been identified given that they are not in close proximity to some services and facilities. The negative effect expected as part of an overall mixed effect for East of Kingsfold and Buck Barn is expected to be significant. These sites are not located within close proximity of the built-up area boundary of the nearest settlement or existing healthcare or education facilities. Furthermore, the course of the A24 (which is most dual carriageway) would separate new residents at Buck Barn from the settlement of Southwater. Although the proposals for these sites include the provision of new services and facilities, the nearest town centre and healthcare and education facilities are not within close proximity and unlikely to be easily accessible to residents.

**1.23** None of the sites are located within a 40% most deprived area and therefore the potential for development to achieve local regeneration in areas at which issues of social

deprivation are mostly likely to be prevalent is limited. Although some sites could potentially complement and contribute to the vitality of the existing uses at the town and neighbourhood centres, none of the sites were considered to have a significant positive effect against **SA objective 3: inclusive communities**. The potential for promoting community cohesion and fostering local relationships may be further achieved at new urban extensions and settlements where policy requirement for the development is included to support community events and/or facilities. A minor negative effect was identified in combination with the positive effect for West of Billingshurst as the A29 could act as a barrier to cohesion between the existing settlement and the new development.

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

**1.25** A mixed effect is expected for all but one of the sites in relation to **SA objective 5: health and wellbeing**. The exception to this is the Ashington cluster for which a significant positive effect alone is expected, as it is in close proximity to existing healthcare facilities and sports facilities. Of the remaining sites, all but one (East of Kingsfold), are expected to have a significant positive effect as they are either in close proximity to at least one existing health centre and an area of open space/sports facility or site proposals would include the delivery of new healthcare facilities and open space/active travel. However, uncertainty is attached to these scores considering the potential for existing healthcare facilities to be overburdened as a high amount of new development is delivered at each location. A significant negative effect was identified for West of Ifield and Rookwood respectively as they could result in the loss of an area of outdoor sports provision. For the East of Kingsfold site a mixed minor positive and significant negative effect is expected in relation to SA objective 5. This site is not in close proximity to any existing healthcare or recreational areas. The provisions for the site include open space but healthcare provision is more limited than provisions at other sites. At the Kingsfold site this would include only financial contributions to healthcare as well as land a new healthcare facility if it is required. Furthermore, the northern part of this site also lies within the noise contour associated with the Gatwick Airport and the western boundary is adjacent to the A24. A railway line also passes through the site. A negative effect has also been identified in relation to this SA objective for sites that may be affected by noise from aircraft at Gatwick, from railway lines and from A-roads. This takes in the Kingsfold site and all other sites apart from the North East of Henfield (Mayfield) and Ashington cluster sites.



**1.26** An uncertain significant negative effect is expected for all the sites in relation to **SA objective 6: biodiversity**. All eleven sites fall within close proximity of a biodiversity designation and/or fall within an Impact Risk Zone (IRZ) which identifies residential or employment development as a potential risk. East of Billingshurst, Adversane, West of Billingshurst and the Ashington cluster are within the Bat Sustenance Zone associated with the Mens Special Area of Conservation (SAC). The majority of sites include the provision of new and enhancement of existing open space and Green Infrastructure, meaning that there is uncertainty as these measures may help to mitigate adverse effects in relation to the natural environment. A minor positive effect is identified in combination with the negative effect for West of Billingshurst as a significant proportion of the site is expected to be a new country park.

**1.27** All of the large sites proposed are to be delivered on mostly greenfield land as substantial urban extensions or new settlements at currently undeveloped locations. Therefore, there is potential for development to impact the existing character of the landscape. A significant negative effect has been identified for ten sites (West of Ifield, East of Billingshurst, West of Southwater, West of Kilnwood Vale, Rookwood, North East of Henfield (Mayfield), East of Kingsfold, Adversane, West of Billingshurst, and the Ashington cluster) in relation to **SA objective 7: landscape**. These sites lie on land assessed in the Horsham District Landscape Capacity Assessment as having no/low or low-moderate landscape capacity to accommodate large-scale residential and/or employment development. Only Buck Barn lies on land which is mostly assessed having moderate capacity for large scale residential development as part of the Landscape Capacity Assessment.

**1.28** Uncertain significant negative effects have been identified for the majority sites in relation to **SA objective 8: historic environment**. These sites contain or are in close proximity to designated and/or local heritage assets, whose settings may be impacted upon as result of new development. The exception to this is West of Kilnwood Vale to the west of Crawley. The closest designated heritage asset to the site is located approximately 500m to the west and therefore it is likely that the potential for impacts upon its setting will be reduced. As such the negative effect expected for this site is minor.

**1.29** The District contains large swathes of Grade 3 agricultural land as well as substantial portions of land which fall within Mineral Safeguarding Areas (MSAs). As such an uncertain significant negative effect is expected for the majority of sites in relation to **SA objective 9: soil quality** and **SA objective 10: mineral resources**. In the case of West of Ifield and Rookwood a minor negative effect has been identified in relation to soil quality as a high proportion of these

sites are located on Grade 4 agricultural land. Uncertainty is attached to the majority of the scores for these sites in relation to SA objective 9 as there is no data available to distinguish whether the Grade 3 land in the District is Grade 3a (good quality) or the Grade 3b (moderate quality).

**1.30** All of the sites are expected to have a minor negative effect in relation to **SA objective 12: flooding**. While all sites fall mostly outside of the higher risk flood areas and are not expected to propose development within higher flood risk areas, they would result in the development of a large amount of greenfield land. Therefore, all sites would contribute to a substantial increase in the overall area of impermeable surfaces in Horsham. It is expected that new development sites would incorporate SuDS to help mitigate increases in local flood risk.

**1.31** Discussions between the Council and Thames Water and Southern Water indicate Crawley wastewater treatment works (WwTW) may need to be upgraded to accommodate any substantial additional development towards the north east of the District. As such sites which are located towards the boundary with Crawley (West of Ifield and West of Kilnwood Vale) are expected to have a minor negative effect in relation to the **SA objective 11: water resources**. None of the sites considered are located within a Source Protection Zone and the remaining sites are not expected to be constrained by the existing capacity of wastewater infrastructure in the District. A negligible effect has therefore been identified for the remaining sites in relation to this SA objective.

**1.32** Mixed effects are expected for all the sites in relation to **SA objective 13: transport**, **SA objective 14: air pollution** and **SA objective 15: climate change**. The achievement of these SA objectives is likely to be influenced to varying degrees by the potential for the new development to promote modal shift in the District. The proximity of sites to existing sustainable transport links and services and facilities as well as the potential to make new provisions of this type onsite will play an important role in relation to these SA objectives. All of the sites include proposals to help reduce the need for residents to travel and therefore potentially limit the contribution to congestion, climate change and air pollution in the long term.

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

**1.34** Providing and connecting to district heating schemes may be more likely to be achieved at larger developments, although there is no agreed threshold above which this is

considered to be more viable. However, those strategic sites where the inclusion of low carbon and sustainable energy generation explicitly from part of the development proposals have been scored more favourably, although other strategic sites may also offer this potential. Otherwise, options that are likely to place greater reliance on private vehicles, as opposed to walking, cycling and public transport are considered more likely to generate higher carbon emissions.

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

**1.36** It is likely that increased travel in the District will contribute to issues relating to air pollution as well as increasing carbon emissions. Sites West of Ifield, West of Kilnwood Vale, North East of Henfield (Mayfield), Adversane, Buck Barn and the Ashington cluster are expected to have significant negative effects in relation to SA objective 14 as they could lead to increased levels of traffic through Air Quality Management Areas (AQMAs) which may exacerbate existing air quality issues.

**1.37** A significant positive effect has been identified in relation to SA objective 15 for North East of Henfield (Mayfield) and Adversane as the site proposals include low carbon and sustainable energy generation. This type of provision would directly help limit any increase in carbon emissions as a result of new development at these sites. For North East of Henfield (Mayfield), the site is not in close proximity to any existing sustainable transport links and its development would help deliver a new link road which may help to reduce local congestion. The delivery of the link road may also limit the

potential for achieving modal shift in the area. Buck Barn is also poorly related to existing services and facilities and would result in the upgrading of the strategic road network which could reduce the potential to achieve modal shift at this location.

**1.38** While those sites in closest proximity to Crawley could also help facilitate improvements to the strategic road network by facilitating the delivery of the Crawley Western Relief Road, they are comparatively well related to existing services and facilities as well as sustainable transport links within the Crawley and the surrounding area. As such the negative effect expected as part of overall mixed effects in relation to SA objective 15 for these sites is only expected to be minor.

**1.39** As well as meeting the area's identified housing need, the delivery of the large sites also has the potential to contribute to the local economy by increasing the available workforce, increasing local expenditure and providing construction job opportunities in the short term. As such, positive effects are expected for all sites in relation to **SA objective 16: economic growth**. Sites that are mixed use and are to include the delivery of an element of employment land (West of Ifield, North East of Henfield (Mayfield), East of Kingsfold, Adversane, Buck Barn and West of Billingshurst are likely to have a significant positive effect in relation to this SA objective.

**1.40** The locations of the large sites in relation to existing town centres, key employment sites and sustainable transport links has been considered for **SA objective 17: access to employment opportunities**. A significant positive effect has been identified for West of Ifield and Rookwood as they are located adjacent to a higher order town centres of Crawley and Horsham. The significant positive score is reflective of the importance of these towns in terms of employment opportunities for the surrounding area. Conversely, a significant negative effect has been identified for North East of Henfield (Mayfield) and Buck Barn considering their relative remoteness to key employment areas and town centre locations that may restrict resident's access to employment opportunities during the early stages of development. It is recognised that these sites, and many of the other large sites, may generate employment opportunities in their own right.

Table 1.3 Summary of likely sustainability effects of the large site options

SA Objective	SA101: West of Ifield	SA118: Land East of Billingshurst	SA119: West of Southwater	SA291 West of Kilnwood Vale extension	SA394: Rookwood	SA414: North East of Henfield (Mayfield)	SA459/SA674/SA846: Land East of Kingsfold	SA597: Adversane	SA716: Buck Barn	SA744(includes SA225)/SA668: West of Billingshurst	SA085/SA520/SA524/SA539/SA790: Ashington cluster
SA Objective 1: Housing	++	++	++	++	++	++	++	++	++	+++?	+
SA Objective 2: Access to services and facilities	+++?	+	+++?	++/-?	+++?	++/-?	-/+?	++/-	++/-?	++/-?	+/-?
SA Objective 3: Inclusive Communities	+	+	+	0	+	0	0	0	0	+/-?	+
SA Objective 4: Crime	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?
SA Objective 5: Health and wellbeing	++/-?	++/-?	++/-?	++/-?	++/-?	++/-?	-/+?	++/-?	++/-?	++/-?	++?
SA Objective 6: Biodiversity	--?	--?	--?	--?	--?	--?	--?	--?	--?	-/+?	--?
SA Objective 7: Landscape	--?	--?	--?	--?	--?	--?	--?	--?	-?	--?	--?
SA Objective 8: Historic environment	--	--?	--?	-?	--?	--?	--?	--?	--?	--?	--?
SA Objective 9: Soil quality	-	--?	--?	--?	-	--?	--?	--?	--?	--?	--?
SA Objective 10: Mineral resources	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA Objective 11: Water resources	-?	0	0	-?	0	0	0	0	0	0	0
SA Objective 12: Flooding	-?	-	-	-	-	-	-	-	-	-	-
SA Objective 13: Transport	++/-?	++/-?	++/-?	++/-?	++/-?	-/+?	+/-?	-/+?	-/+?	++/-?	+/-?

SA Objective	SA101: West of Ifield	SA118: Land East of Billingshurst	SA119: West of Southwater	SA291 West of Kilnwood Vale extension	SA394: Rookwood	SA414: North East of Henfield (Mayfield)	SA459/SA674/SA846: Land East of Kingsfold	SA597: Adversane	SA716: Buck Barn	SA744(includes SA225)/SA668: West of Billingshurst	SA085/SA520/SA524/SA539/SA790: Ashington cluster
SA Objective 14: Air pollution	++/--?	++/-?	++/-?	++/--	++/-?	--/+?	+/-?	+/-?	--/+?	++/-?	--/+?
SA Objective 15: Climate change	+/-	+/-?	+/-?	+/-?	+/-?	++/--?	+/-?	++/-?	--/+?	+/-?	+/-?
SA Objective 16: Economic growth	++	??	+	+	+	++?	++?	++?	++?	++	??
SA Objective 17: Access to employment opportunities	++	+/-?	+	+	++	--/+?	+/-	+/-	--/+	+/-?	--/+?

### SA of small site options

**1.41** In addition to the large site allocations that will be necessary to help meet the housing requirements for the District, the Council has identified 66 small sites which have potential to be developed for housing and other uses in and around the towns and villages.

**1.42** Fifty-six of these sites have potential to be allocated to contribute to the local housing need (i.e. those considered for residential use or mixed use including residential) and the remaining 10 sites have been considered for employment use only. It should be noted that the 56 housing or mixed use sites do not include some sites in Ashington, which have instead been assessed as part of the ‘Ashington cluster’ as reported in earlier sections.

**1.43** The small sites range in scale from less than 10 dwellings up to 350 dwellings plus employment use. In the main report, the appraisal of the sites is presented by settlement.

### Summary of findings

**1.44** Of the 66 small site options, 56 are expected to have positive effects in relation to **SA objective 1: housing**. These are sites that would support the delivery of new homes in the

District. The 10 remaining sites are being considered for uses which would not include the delivery of new homes. The majority of the sites for which positive effects are expected (53 sites) are likely to have significant positive effects. Most of these sites have the capacity for more than 10 dwellings.

**1.45** The majority of the small site options (61 out of 66) are expected to have positive effects in relation to **SA objective 2: access to services and facilities**, due to their close proximity to the boundaries of a built-up area as well as specific services and facilities within the District. For 34 sites a significant positive effect is likely as they are located within close proximity to the Main Town (Horsham) or a Small Town or Larger Village in the District.

**1.46** Negligible effects are expected for all but five of the small site options in relation to **SA objective 3: inclusive communities**.

**1.47** All of the small site options are expected to have uncertain negligible effects in relation to **SA objective 4: crime**.

**1.48** Sixty-two of the small site options are expected to have positive effects in relation to **SA objective 5: health**, due to their proximity to healthcare facilities and areas such as open spaces or sports facilities which may help to encourage more active lifestyle choices in Horsham. The effect for 29 of these



sites is expected to be significant, as they are located within close proximity of both a healthcare facility and an area of open space or sports facility.

**1.49** The majority of the 66 small site options are expected to have negative effects in relation to **SA objective 6: biodiversity and geodiversity**, as development could result in habitat loss, fragmentation and/or disturbance. A significant negative effect is expected for 23 of the sites due to their location within one of Natural England's designated SSSI Impact Risk Zones (IRZ). 26 sites lie within the bat sustenance zone which has been designation in relation to the Mens SAC. In all cases, the effects identified are uncertain as mitigation may avoid or reduce negative effects.

**1.50** In relation to **SA objective 7: landscapes and townscapes**, development within the District has the potential to disrupt existing character as well as the setting of designated landscapes such as that of the High Weald AONB and those within the South Downs National Park. The potential for impacts relating to landscape character in the District has been informed by the findings of the Landscape Capacity Assessment. Significant negative effects are identified for 44 sites as these are located within a Local Landscape Area identified as having 'No/Low' landscape capacity or 'Low-Moderate' landscape capacity for new housing development or employment development.

**1.51** Information available in Conservation Area Appraisals for the District has been used to identify particularly sensitive heritage assets and key views. This information and the proximity of the small site options to heritage assets has been used to consider the potential for the allocation of sites to have an impact on the significance of these assets or that of their setting. Forty-seven sites are expected to have significant negative effects in relation to **SA objective 8: historic environment** given their proximity to designated heritage assets which may be negatively affected by development of the site. All effects are uncertain as they will depend on the detailed design of the development, which may allow for the incorporation of appropriate mitigation.

**1.52** Sixty-four of the small sites are expected to have negative effects in relation to **SA objective 9: efficient land use**, given that they are located on greenfield land. The negative effect is likely to be significant for 47 of these sites due to their location on land which is classed as Grade 1, Grade 2, or Grade 3 agricultural quality, although for 42 of these sites the significant negative effect is uncertain as they lie on Grade 3 agricultural land.

**1.53** Fifty-five of the small site options are expected to have significant negative effects in relation to **SA objective 10: mineral resources** as they lie within an MSA. Development at these locations could result in loss of access to or sterilisation of the finite mineral resources in the District. The negative

effects are uncertain, as there may be potential for mineral extraction to be undertaken prior to the development of the sites.

**1.54** Only three of the 66 small site options are expected to have minor negative effects in relation to **SA objective 11: water resources**, as they lie within a Source Protection Zone (SPZ).

**1.55** All of the 66 small site options are located on land that is mostly within flood zone 1. However, 64 of these sites are also located on greenfield land. As development may result in an increased risk of flooding considering the overall increase in impermeable surfaces in the District, a minor negative effect is expected in relation to **SA objective 12: flooding** for the majority of small sites.

**1.56** Sixty-two of the small site options are expected to have a positive effect in relation to **SA objective 13: transport** due to their proximity to public transport links. It is expected that development at these locations offer the greatest potential to limit increases in location congestion levels related to travel by private vehicles in the District. A significant positive effect is expected for 16 of these sites as they are within 1.8km of a railway station. These sites are located within or in close proximity to the settlements of Pulborough and Codmore Hill, Billingshurst, Christ's Hospital, Horsham Town or Warnham where the District's railway stations are found.

**1.57** The potential for increased travel by private vehicle is likely to impact air quality in the District as development is provided over the plan period. This is particularly likely to be case where existing air pollution issues have been identified. Eleven sites are either within or directly connected via a road to an Air Quality Management Area (AQMA), and therefore expected to have a significant negative effect on **SA objective 14: air quality**. These sites are located at or in close proximity to Horsham Town, Storrington, Southwater and Cowfold.

**1.58** As described under the SA of the large site options, all new development is likely to result in carbon emissions, as new homes and businesses require heat and electricity, but has the potential to be reduced through energy efficient design and construction, and the inclusion of low energy and renewable energy sources to supply heat and power.

**1.59** Providing and connecting to district heating schemes may be more likely to be achieved at larger developments. However, there may be some scope to connect smaller sites to district heating schemes associated with large sites in the District. As the preferred large sites have yet to be identified, and the scope for district heating not yet established, this element of the SA for small sites has therefore focussed on potential transport patterns in the District and the likely effect of this in relation to climate change. Options that are likely to place greater reliance on private vehicles, as opposed to

walking, cycling and public transport are likely to generate higher carbon emissions. Conversely, sites that are likely to facilitate walking, cycling and the use of public transport are likely to generate lower carbon emissions from transport.

**1.60** Sixty-two of the sites are therefore expected to have a positive effect in relation to **SA objective 15: climate change** given their proximity to more sustainable transport links. Of these 62 sites, 16 are within 1.8km of a railway station, and therefore a significant positive effect is expected. The majority of the small sites would provide residential development only, which could provide some amount of employment opportunities associated with the construction of new homes. However, the delivery of a wider range of employment opportunities and sustainable economic growth in the District will be most supported through the allocation of viable employment sites or mixed-use sites which include some employment development. Fourteen of the small sites would provide new employment development alone or a mix of uses which include employment or commercial uses. Three of these sites would provide more than 5.0ha of employment land and are expected to have a significant positive effect in relation to **SA objective 16: economic growth**.

**1.61** All seven sites being considered at Horsham and Christ's Hospital are expected to have a significant positive effect in relation to **SA objective 17: access to employment opportunities**, reflecting their close proximity of Key Employment Areas and Horsham town centre, four of which will also provide new employment uses. Thirteen sites are not located within 2.7km of a key employment area or within 720m of Horsham town centre and therefore a significant negative effect is expected in relation to this SA objective. These sites are located at Barns Green, Lower Beeding, Rusper, Rudgwick, Steyning, Bucks Green and West Chiltington Village and Common.

## SA of growth scenario options

**1.62** Drawing on the appraisal of the six overall strategy options, the appraisal of the three quanta of growth, and the appraisal of the large-scale and small-scale sites, the Council has prepared nine more spatially specific growth scenarios that could be included in the Local Plan Review. These have also been subject to SA.

**1.63** The growth scenario options relate to either lower, medium or higher growth scenarios. They include different combinations of large site and small site options to ensure that all reasonable alternative options relating to approach to the distribution of growth in the District have been appraised. For each growth scenario, a level of growth to be achieved from smaller non-strategic sites is assumed. With the exception of Scenario 7, this can be met from the 56 residential or mixed use sites referred to in the preceding section.

**1.64** The rationale underpinning each growth scenario is as follows. Note that the total homes relates to the whole plan period and refers to housing delivery on allocated sites only. It does not include already-committed development, windfall housing or homes already completed:

- **Scenario 1: lower growth settlement hierarchy - urban extensions (Total new homes: 8,050)**

*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.*

- **Scenario 2: lower growth new settlement option (Total new homes: 8,050)**

*This scenario accommodates a lower level of growth, it includes all three of the new settlement proposals but assumes a slower delivery hence no more than 2,000 homes would be delivered on any one site within the Plan period. It allows for a medium level of growth from smaller sites at settlements within the settlement hierarchy.*

- **Scenarios 3a, 3b and 3c: medium growth new settlement plus settlement hierarchy (Total new homes: 11,700)**

*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.*

- **Scenario 4: medium growth new settlements and small sites only (Total new homes: 11,700)**

*This scenario accommodates a 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.*

- **Scenario 5: medium growth urban extension and small sites option (Total new homes: 11,700)**

*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.*

■ **Scenario 6: higher growth urban extension and new settlements (Total new homes: 17,100)**

*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 400 homes.*

■ **Scenario 7: higher growth urban extension and small sites (Total new homes: 15,100)**

*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.*

**Summary of findings**

**SA objective 1: Housing**

**1.65** All scenarios considered would meet the objectively assessed 'local housing need' of 965 dwellings per annum. The Lower Growth Scenarios would perform less favourably than the other scenarios in relation to meeting the housing needs of the District, delivering new affordable homes and more generally addressing affordability issues. The Higher Growth Scenarios would best help deliver a wide range of housing types and tenures to meet local need and also address affordability. Scenarios 1, 3a, 3b, 3c, 5, 6 and 7 which include sites in close proximity to Crawley (most notably at Ifield) could help to contribute to the unmet housing need in that local authority under the Duty to Cooperate.

**SA objective 2: Access to services and facilities**

**1.66** It is likely that the Higher Growth Scenarios would support the delivery of new services and facilities in Horsham District, but could place increasing demands on existing

provision. Scenario 7 could result in a more dispersed distribution of growth meaning that some residents are poorly located to certain types of facilities.

**1.67** The Lower Growth Scenario 1 would provide many new residents with good access to existing provisions and could help to sustain service provisions at smaller settlements by providing an appropriate level of development at these locations. The Lower Growth Scenarios would, however, provide less support for new service provision in Horsham. Lower Growth Scenario 2 would require investment in new settlements which, at a lower scale and pace of delivery, may be more difficult to achieve.

**1.68** The Medium Growth Scenarios (particularly Scenarios 3a, 3b and 3c which provide a balance between urban extension sites and new settlements) could help to deliver new services at large site options and would also make best use of existing services and facilities. The particularly high level of growth supported at the North East of Henfield (Mayfield) site (7,000 new homes) in the long term could provide substantial new service provision beyond the plan period. It is expected that the site at Buck Barn would perform less favourably than the other new settlement site options in terms of access to existing services and facilities. The site is located more than 1.0km from the built-up area boundary of the nearest large settlement (Southwater) as well as existing essential services including healthcare and education. As such the negative effect expected for Scenario 3c is likely to be significant.

**1.69** Of the Medium Growth Scenarios, Scenario 4 and 5 are likely to perform less favourably as they include a high level of growth at small sites which might result in a more dispersed distribution of growth or large sites which provide access to limited existing service provision, such as at Ashington and Kingsfold.

**SA objective 3: Inclusive communities**

**1.70** All scenarios have the potential to result in adverse impacts in relation to disruption of existing community networks and implications for local placemaking.

**1.71** The Lower Growth Scenarios are considered most likely to avoid major impacts relating to these issues. Scenario 1 would respond particularly well in relation to this issue as it distributes growth mostly in line with the settlement hierarchy.

**1.72** The delivery of new settlements will result in challenges given that placemaking will be undertaken 'from scratch'. Scenario 4 which includes all three new settlement site options is likely to have particularly adverse impacts in this regard.

**1.73** Distributing a high proportion of growth to small sites in a more dispersed manner (through Scenario 7, in particular)

also has potential to result in adverse impacts at a higher number of locations.

#### SA objective 4: Crime

**1.74** While each scenario considered would result in varying distributions of growth in the District, they would not influence the design of new development which comes forward. As such similar negligible effects are expected for each scenario.

#### SA objective 5: Health

**1.75** The Lower Growth Scenarios would result in more limited pressures in terms of overburdening existing facilities. Scenario 1 would provide a high number of residents with access to existing healthcare facilities by including urban extensions and small sites broadly in line with the development hierarchy.

**1.76** Including one of the new settlement site options and providing a proportion of growth in line with the development hierarchy (Scenarios 3a, 3b and 3c) would allow for new healthcare provisions at the new settlements to be delivered. This could have benefits for the wider area. Of these three scenarios, Scenario 3b is expected to have the most uncertain effects over the plan period as it would include the development of the Adversane site, which might not have the potential to support substantial new healthcare facilities. This site is to provide a lower number of homes over the plan period in comparison to the other new settlement site options. Beyond the plan period Adversane and Buck Barn have both been put forward to respectively accommodate approximately 3,500 homes meaning that new service provision is likely to be more viable in the long term. The high level of growth at North East of Henfield (Mayfield) (7,000 new homes) beyond the plan period is considered the most likely of the three new settlement site options to support substantial healthcare services.

**1.77** The site at Kingsfold is less well related to existing healthcare provision meaning that new residents under Scenarios 5, 6 and 7 would have to travel to Horsham to access facilities.

**1.78** It is unlikely that the more dispersed distribution of growth set out through the higher number of small sites at Scenarios 4 and 7, in particular, would support substantial new healthcare provision and could result in a proportion of new residents have reduced levels of access to these types of facilities.

#### SA objective 6: Biodiversity and geodiversity

**1.79** While delivering a higher level of development in the District is likely to result in increased loss, fragmentation and disturbance of local habitats, all scenarios considered include

sites which are in close proximity to designated assets. Sites within the west of the District fall within the bat sustenance zone related to the Mens SAC.

**1.80** Numerous sites also fall within SSSI IRZs which have identified the potential uses for the site options as a risk to that designation. While concentrated greenfield land take at large urban extension sites and new settlements is likely to result in specific effects, a wide distribution of growth through a higher number of small sites as set out in Scenarios 4 and 7 has the potential to lead to a wider degradation of important designated assets as well as undesignated ecological networks.

#### SA objective 7: Landscapes and townscapes

**1.81** It is likely that delivering a relatively high amount of growth over the plan period could have impacts in terms of existing landscape character in Horsham District. Scenario 2 is expected to perform mostly favourably in relation to these issues.

**1.82** While the new settlement site options could result in specific challenges relating to mitigating adverse impacts on landscape character, areas of the new settlement sites have been identified as having capacity to accommodate new growth. This is particularly the case at the Buck Barn site. Therefore, of the scenarios which provide for a more balanced approach between urban extension sites and new settlements, Scenario 3c may perform most favourably.

**1.83** Many of the urban extension sites contain large areas of land that have been assessed as having no/low capacity to low-moderate for large scale development. However, it is also recognised that the Landscape Capacity Study is currently being updated, therefore it is possible that, in light of new evidence emerging, some assessments may change. At these sites the design of development and the specific areas of the site which will be developed will influence impacts on landscape character. It is noted that parts of the North Horsham site and Kilnwood Vale extension (included in all scenarios apart from Scenarios 2 and 4) are adjacent to the High Weald AONB. As such these scenarios have the potential for particular adverse impacts relating to landscape sensitivities to result.

**1.84** The inclusion of the Kingsfold site (1,000 homes) to support the delivery of a medium and higher levels of growth (Scenarios 5, 6 and 7) would result in additional growth within an area with limited landscape capacity for development. Including all urban extension and new settlement site options (Scenario 6) would result in concentrated greenfield land take a higher number of locations and could have significant cumulative effects on the existing rural character of the District.



**1.85** As Scenarios 4 and 7 would include a higher number of smaller sites there is potential for a wider dispersal of growth to have impacts on local character at wider range of locations. This could potentially include impacts relating to the townscape of smaller settlements as well as at locations related to the AONB and National Park.

#### SA objective 8: Historic environment

**1.86** It is also expected that delivering a relatively high level of development over the plan period would have implications in terms of the protection of local heritage assets and their respective settings. Many of the heritage assets in the District are located within the larger settlements. As such, the provision of development in line with the settlement hierarchy (Scenario 1) has the potential for adverse impacts in relation to the historic environment even if a lower level of growth was provided. Particularly adverse impacts have also been identified in relation to the new settlement site options.

**1.87** Of the Medium Growth Scenarios which would include one new settlement option, Scenario 3a has the potential to result in additional adverse impacts in relation to Henfield Conservation Area; Scenario 3b has the potential to result in additional adverse impacts in relation to Adversane Conservation Area; and Scenario 3c has the potential to result in additional adverse impacts in relation to Knepp Castle Registered Park and Garden. Of these scenarios, Scenario 3b would include a higher level of growth at small sites (although the level of growth would mean it would be broadly in line with the settlement hierarchy) meaning a more dispersed distribution of growth in the plan area. This type of approach could have adverse impacts in relation to a higher number of heritage assets.

**1.88** Scenarios 4 and 7 would result in a more widely dispersed distribution of growth in Horsham District. These scenarios would include a high level of growth at small sites and could potentially result in a wide range of heritage assets being affected as new growth is delivered. A high number of more piecemeal effects on local character may also result through these scenarios.

#### SA objective 9: Efficient land use

**1.89** Given the noted rural character of the District there is limited supply of brownfield land. Much of the new development will therefore come forward at greenfield sites, many of which comprise high quality (Grade 3a and higher) agricultural soils.

**1.90** The Lower Growth Scenarios will result in lower amounts of greenfield land being developed, as well as loss of good quality agricultural soils. Scenario 1 would provide a low level of growth broadly in line with the settlement hierarchy at urban extensions and small sites. Some of the small site options

being considered contain brownfield land for development and there may be some opportunities to re-use brownfield land at the existing edges of settlements.

**1.91** The inclusion of the North Horsham site through Scenario 1 (as well as all other scenarios apart from Scenarios 2 and 4) would result in more efficient land use at this existing allocation by allowing for densification of the site. Including one new settlement site option (Scenarios 3a, 3b and 3c) as well as a relatively high proportion of development in line with the settlement hierarchy could also achieve some re-use of brownfield land. These scenarios are also likely to result in the development of a large area of greenfield land, including land which is currently within the open countryside at the new settlement sites.

**1.92** The new settlement site at Adversane (Scenario 3b) comprises almost exclusively Grade 3 agricultural soil, while the other new settlement sites consist of both Grade 3 and Grade 4 soils. Including all three of the new settlement sites and a very high number of small sites (Scenario 4) would result in concentrated greenfield land take at specific locations as well as the potential to disperse a proportion of development to a high number of more rural greenfield locations in the District.

**1.93** As Scenario 5 would include all urban extensions and deliver a medium level of growth, high levels of greenfield land take would also result for this scenario.

**1.94** The Higher Growth Scenarios would include all large site options (Scenario 6) or all urban extension sites and a high level of growth at small sites (Scenario 7). Scenario 7 has the potential to result in greenfield land take at a high number of more rural locations in the District.

#### SA objective 10: Mineral resources

**1.95** Much of the District outside of the built up areas is covered by Mineral Safeguarding Areas (MSAs). Development within these areas has the potential to result in loss of access to or sterilisation of finite mineral resources. Supporting a higher level of growth within the District has the potential to result in adverse impacts on these resources. However, all scenarios considered would result in considerable development within MSAs.

**1.96** The lower level of growth set out through Scenario 1 means that a proportion of development could be accommodated at the urban edges of the larger settlements of the District which fall outside of MSAs. Delivering a proportion of development in line with the development hierarchy would also help to avoid growth within the MSAs. Scenario 2 would result in substantial proportion of growth proceeding at the new settlement site options all of which lie within MSAs,

meaning that this approach could have particularly adverse in terms of mineral assets.

**1.97** The combined higher levels of growth (set out through Scenarios 3 to 7) and inclusion of either a high number of large urban extensions and/or new settlements means that the remaining scenarios would have similarly adverse impacts.

**1.98** Where a high level of growth is to be provided at small sites (Scenarios 4 and 7), development may occur in a more dispersed distribution which is less in line with the settlement hierarchy. As such impacts may occur in relation to a wider range of MSAs.

#### SA objective 11: Water resources

**1.99** Pressures on water infrastructure in the District is likely to result as development occurs, with higher levels of development having potential to place increased demand on this infrastructure. Discussions with water providers (Thames Water and Southern Water) indicate that only a small area in the north eastern part of the District towards the boundary with Crawley may have issues in terms of accommodating large scale development. At this location initial discussions indicate that there may be a need to upgrade the current waste wastewater infrastructure. Given the early stages of these discussions there is an element of uncertainty attached to these assumptions.

**1.100**As Scenario 2 would provide only a low level of overall development and would not result in growth by Crawley there is limited potential for any adverse impacts. This scenario would provide development at small sites which is broadly in line with the settlement hierarchy and therefore it is unlikely to allow for development within the SPZs in the District.

**1.101**Scenarios 3a, 3b, 3c, 5 and 6 would all result in new homes being provided by Crawley at Ifield and the Kilnwood Vale extension which could overburden existing wastewater infrastructure.

**1.102**While Scenario 4 would not include this element of growth, the high level of development supported at small sites (3,700 new homes) could result in a more dispersed distribution of growth and the potential for development within an SPZ.

**1.103**The adverse effects expected for Scenario 7 are particularly strong given that this scenario includes urban extension sites for development by Crawley and also the highest level of small site development (5,600 new homes) of all scenarios considered.

#### SA objective 12: Flooding

**1.104**Greenfield land take within the District is likely to result in substantial increases in impermeable surfaces which could

increase local flood risk. It is expected that planning policy will require new development to mitigate potential flood risk through the incorporation of SuDS.

**1.105**As Scenarios 1 and 2 would allow for the lowest level of growth the amount of greenfield land required for development is comparatively reduced. Development set out through Scenario 1 is to be provided most in line with the development hierarchy at urban extensions and small sites. A small number of the small sites comprise brownfield land and there may be opportunities to re-use previously developed land at the built up area boundary. Scenario 2 would, however, include three new settlement site options which comprise entirely greenfield land the development of which would provide large scale development where open countryside previously existed.

**1.106**Some of the urban extension and new settlement sites contain areas of higher flood risk. However, these areas comprise small portions of the overall sites. It is therefore expected that development will be provided to avoid these locations.

**1.107**All Medium Growth Scenarios and Higher Growth Scenarios are expected to have particularly adverse impacts in relation to flood risk considering the high amounts of greenfield land required.

**1.108**The most substantial adverse impacts are expected for Scenarios 6 and 7 given the higher number of homes to be delivered. Scenario 7 would include a particularly high number of homes (5,600) at small sites. The more dispersed distribution of growth may potentially result sites coming forward within higher risk flood areas.

#### SA objective 13: Transport

**1.109**Providing new growth in line with the development hierarchy (Scenario 1) could have particularly beneficial effects given that residents are likely to benefit from access to existing services and facilities as well as sustainable transport links. Including development at Crawley through this scenario (as well as all other scenarios other than Scenarios 2 and 4) would respond positively to existing commuting patterns towards important employment areas for residents in Horsham District. This scenario could also support the delivery of an appropriate level of development to more rural locations, thereby supporting service provisions at these areas.

**1.110**The inclusion of all new settlement site options (Scenario 2) could support new service provision and sustainable transport links in the long term, although none include an existing train station. New settlements could lead to new residents being required to travel longer distances in the short term in particular. Providing new high quality employment land at these locations could help establish a degree of self-containment.

**1.111** Capping the size of new settlements at 2,000 new homes through Scenario 2 could also limit the scale of service provision at these locations.

**1.112** Scenarios 3a, 3b and 3c would allow for a more balanced approach to growth, which includes growth by Crawley as well as Horsham town and other large settlements and one new settlement site. Residents may be required to travel less frequently by private car through these scenarios. The high level of growth (7,000 new homes) to be provided at North East of Henfield (Mayfield), in particular beyond the plan period may support a degree of self-containment here. These scenarios would support the improvement of the strategic road network by Crawley which could help reduce congestion in the area.

**1.113** Including all three new settlement options and/or a wide distribution of development through Scenarios 4, 6 and 7 could result in an increased requirement to travel by private vehicle. The inclusion of the site by Kingsfold (Scenarios 5, 6 and 7) is likely to result in an increased requirement to travel south to the settlement of Horsham.

#### SA objective 14: Air quality

**1.114** The Higher Growth Scenarios have the potential to particularly adverse impact air quality. As Scenario 7 would allow for a more dispersed distribution of growth which is likely to provide limited potential for new service provision and sustainable transport improvements at many locations, this scenario performs most poorly.

**1.115** Scenario 4 also performs very poorly as it would also allow for a dispersed distribution of growth and could also result in increased travel within the Cowfold AQMA which is connected to the new site options at Buck Barn and North East of Henfield (Mayfield).

**1.116** The new settlement site options are expected to provide substantial new service provision and sustainable transport links but the potential for residents to travel will be partly dependent on the phasing of development.

**1.117** It is noted that Scenario 3b performs more favourably than Scenarios 3a and 3c as the development of land at Adversane is unlikely to increase traffic within an AQMA. However, this settlement would support the lowest level of growth over the plan period (2,000 homes) and might therefore support less substantial service provision and reduced potential for achieving self-containment than Scenario 3a and 3c. Self-containment is more likely to be achieved beyond the plan period at the Adversane site, given that 3,500 homes would be delivered at the site up to 2043.

**1.118** In the long term the high level of growth to be provided at the settlement to the North East of Henfield (Mayfield)

(7,000 new homes when built out beyond the plan period) could support a high level of self-containment.

**1.119** While Scenario 1 (as well as all other scenarios apart for Scenarios 2 and 4) has the potential to lead to increased traffic within the Hazelwick AQMA by Crawley and therefore may aggravate existing air quality issues here, it also includes urban extensions and small sites which are broadly in line with the development hierarchy. In any case providing development at Crawley is likely to provide residents with a good level of access to services and sustainable transport links (including railway stations) as well as employment opportunities. The latter point is perhaps most important given the role Crawley plays for residents in terms of job opportunities.

**1.120** While Scenario 1 is less likely to result in substantial new service provision it would provide access to existing provisions for a high number of new residents. Delivering growth in line with the development hierarchy could also support limited service provision at smaller settlements.

#### SA objective 15: Climate change

**1.121** New development will inevitably result in increased carbon emissions in the plan area as a result of construction and as new homes and businesses are occupied. The number of journeys made in the District will also greatly impact upon the District's contribution to climate change from transport. There is potential for the delivery of renewable energy schemes as growth occurs. Larger developments are likely to have the greatest potential to include district heating or combined heat and power (CHP).

**1.122** More limited potential for increases in private car journeys is likely to result where the development hierarchy is best adhered to (Scenario 1) and the largest amounts of development are provided in close proximity to existing services and sustainable transport links. This would include growth by Crawley which would respond positively to established commuting patterns and reduce the need to travel longer distances to employment opportunities. The existing urban area also presents opportunities for delivery of CHP.

**1.123** Providing new settlements (at North East of Henfield (Mayfield), Adversane, and/or Buck Barn) in the District could support new service provision but these areas are not well related to the existing settlements in Horsham. These settlements could also viably support the incorporation of renewable/low energy schemes such as CHP. It is likely that Scenarios 3a (North East of Henfield (Mayfield)) has the greatest potential to perform favourably in terms limiting carbon emissions over the plan period and in the longer term in particular. While this site provides only a moderate level of access to existing services and facilities, it performs more favourably than the Buck Barn site (Scenario 3c) in this

regard. It also has the potential to outperform the Adversane (Scenario 3b) in terms of delivering a high proportion of overall growth at this large new settlement site which might support more sustainable energy systems.

**1.124**The high level of long term growth supported at North East of Henfield (Mayfield) in particular (7,000 new homes beyond the plan period), may also provide opportunities for the delivery of more substantial services and the establishment of a more self-contained settlement.

**1.125**Scenarios 4 and 7 are expected to perform least favourably given that they include a very high level of growth at small sites (3,700 new homes and 5,600 new homes, respectively). The more dispersed distribution of growth that could result may lead to increased need to travel by private car to access essential services and jobs. It is unlikely that small sites would be able to support substantial new service provision in the District. A more dispersed distribution of growth which is achieved at a higher number of small sites is also less likely to be supportive of connections to CHP and district heating schemes.

#### SA objective 16: Economic growth

**1.126**Providing a high level of growth over the plan period presents increased potential for economic development. The District is likely to benefit from an increased workforce, as well as growth in the building sector and related supply chains as well as increase expenditure in businesses and retail centres.

**1.127**The Lower Growth Scenarios are less likely to promote the achievement of these benefits. Scenario 1, however, would support local centres and would respond to the economic realities of the District by providing growth by the important local employment areas; most notably at Horsham town and Crawley.

**1.128**By including most of the development at new settlements (each of which would be capped at 2,000 homes over the plan period), Scenario 2 would help secure some new high quality new employment floorspace which could attract investment. Providing new high scale growth at these areas could help to rebalance commuting patterns but the lower levels of development supported through this scenario would be less effective in achieving this.

**1.129**Scenarios 3a, 3b and 3c would achieve a more balanced approach to growth by including growth adjacent to Crawley and the larger settlements in Horsham District and also one of the three new settlement options.

**1.130**Over the plan period it is expected that each new settlement site option would perform similarly in relation to the economic growth of Horsham District, given that they are likely to help encourage inward investment by including new employment floorspace. The new settlement site options are

all less well related to existing employment sites and sustainable transport links. In the long term (beyond the plan period) the Land North East of Henfield (Mayfield) would provide 7,000 new homes, which could help to support a sizeable local economy, but it is less well located to other centres of economic growth, particularly the Gatwick Diamond.

**1.131**Of the Medium Growth Scenarios, Scenario 5 is likely to perform most favourably. This scenario includes the additional sites at West of Billingshurst and Kingsfold. Billingshurst provides access to a railway station and local employment opportunities while land at Kingsfold is in close proximity to a key employment area.

**1.132**Scenarios 6 and 7 would allow for the highest levels of growth, with 17,100 new homes and 15,100 new homes being delivered respectively. Scenario 6 would fail to include any new settlement options, which would potentially miss opportunities to provide attractive new employment land for inward investment, while Scenario 7 would include a high portion of growth at small sites in a more dispersed distribution meaning that development is likely to be more difficult to relate to existing and new employment land.

#### SA objective 17: Access to employment opportunities

**1.133**The importance of the town of Horsham and the adjoining area of Crawley (including parts of the Gatwick Diamond) in terms of providing employment opportunities for Horsham's residents is likely to greatly influence accessibility of jobs as new development is provided.

**1.134**The largest settlements provide access in Horsham District to local employment opportunities and therefore including development as urban extensions or as small sites in line with the settlement hierarchy (Scenario 1) would provide a high number of residents with access to key employment areas. This scenario would also include land by Crawley and therefore is expected to perform most favourably of the Lower Growth Scenarios.

**1.135**Scenarios 3a, 3b and 3c would include these small urban extension sites but would also include one new settlement site which could help provide nearby new employment opportunities. It is noted that the provision of high-quality employment land in the District at new settlements also has the potential to attract new well-paying jobs to the plan area. Given the lower amount of development to be provided at the Adversane settlement (Scenario 3b) over the plan period (2,000 homes), employment provision may not be as substantial. It is noted that beyond the plan period a higher amount of development (3,500 homes) would be delivered at this site, which may support further employment provision. Land North East of Henfield (Mayfield) (Scenario 3a) would provide a particularly high level of growth beyond the plan period (7,000 new homes) and may provide for more self-



containment than the other new settlement site options being considered.

**1.136** Scenario 5 is expected to perform in a comparatively positive manner given that it includes positively performing large sites by Crawley and Horsham, as well as additional sites at West of Billingshurst and Kingsfold both of which are close to key employment areas.

**1.137** The Higher Growth Scenarios are likely to drive job creation in Horsham most substantially, but in terms of achieving a balanced distribution of development, these

scenarios are not expected to perform as favourably as Scenarios 3a, 3b and 3c in particular. Focussing growth to large site options (Scenario 6) would include all three new settlements meaning that existing areas of employment would not be immediately accessible to residents. Concentrating growth at smaller site options (Scenario 7) could result in a more dispersed distribution of growth and provide a high proportion of residents at more rural locations where employment opportunities are less likely to be accessible.

Table 1.4 Summary of likely sustainability effects of the growth scenario options

SA objectives	Lower Growth Scenarios		Medium Growth Scenarios					Higher Growth Scenarios	
	Scenario 1: Lower growth settlement hierarchy – urban extension	Scenario 2: Lower growth new settlement option	Scenario 3a: Medium growth new settlement plus settlement hierarchy (Land North East of Henfield (Mayfield) )	Scenario 3b: Medium growth new settlement plus settlement hierarchy (Adversane)	Scenario 3c: Medium growth new settlement plus settlement hierarchy (Buck Barn)	Scenario 4: New settlements and small sites only	Scenario 5: Medium growth urban extension and small sites option	Scenario 6: Higher growth urban extension and new settlements	Scenario 7: Higher growth urban extension and small sites
SA objective 1: Housing	+/-	+/-?	++	++	++	++/-	++	++?	++?
SA objective 2: Access to services and facilities	+/-	--/+	++/-	++/-?	++/--	--/+	++/--	--/+	--/+
SA objective 3: Inclusive communities	++/-	--/+	+/-	+/-	+/-	--/+	--/+	--/+	--
SA objective 4: Crime	0	0	0	0	0	0	0	0	0
SA objective 5: Health	++/-	++/--?	++/--	++/--?	++/--	--/+	--/+	--/+	--
SA objective 6: Biodiversity and geodiversity	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA objective 7: Landscapes and townscapes	--?	-?	--?	--?	--?	--?	--?	--?	--?

Non-technical summary

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SA objectives	Lower Growth Scenarios		Medium Growth Scenarios					Higher Growth Scenarios	
	Scenario 1: Lower growth settlement hierarchy – urban extension	Scenario 2: Lower growth new settlement option	Scenario 3a: Medium growth new settlement plus settlement hierarchy (Land North East of Henfield (Mayfield) )	Scenario 3b: Medium growth new settlement plus settlement hierarchy (Adversane)	Scenario 3c: Medium growth new settlement plus settlement hierarchy (Buck Barn)	Scenario 4: New settlements and small sites only	Scenario 5: Medium growth urban extension and small sites option	Scenario 6: Higher growth urban extension and new settlements	Scenario 7: Higher growth urban extension and small sites
SA objective 8: Historic environment	--?	--?	--?	--?	--?	--?	--?	--?	--?
SA objective 9: Efficient land use	+/-	-	--/+	--/+	--/+	--	--	--	--
SA objective 10: Mineral resources	-?	--?	--?	--?	--?	--?	--?	--?	--?
SA objective 11: Water resources	-?	0	-?	-?	-?	-?	-?	-?	--?
SA objective 12: Flooding	-?	--?	--?	--?	--?	--?	--?	--?	--?
SA objective 13: Transport	++/-?	--/+	++/-?	++/-?	++/-?	--	--/+?	--/+?	--?
SA objective 14: Air quality	++/-	--/+	++/--	++/-	++/--	--	--/+	--/+	--
SA objective 15: Climate change	++/-	--/+	++/-	++/--	++/--	--/+	++/--	--/+	--
SA objective 16: Economic growth	+/-	--/+	+/-	+/-	+/-	--/+	++/-	++/--	++/--
SA objective 17: Access to employment opportunities	++/-	+/-	++/-	++/-	++/-	--/+	++/-	++/--	++/--

## Conclusions

**1.138** The SA of the growth options has shown that there are no easy decisions for the Council to make. No one overall quantum of growth or spatial strategy stands out as being markedly superior in sustainability terms when compared to the others.

**1.139** Some broad conclusions can be drawn from the SA work undertaken, that may help the Council come to a view which growth option should be preferred:

1. Although the higher quantum of growth option will do most to meet the needs not only of Horsham District but also the unmet needs of neighbouring authorities, it is also the option that is most likely to result in significant environmental effects in the District. Conversely, the lower growth option will result in less likelihood of significant environmental effects but will make only a very modest contribution to providing homes and jobs for the unmet needs of neighbouring authorities, some of which are highly constrained environmentally too. The medium growth option represents a balance between the two.
2. Spatial strategies that focus development at existing larger settlements are likely to be the most sustainable in terms of access to jobs, services and facilities, and public transport, and therefore also help to minimise carbon emissions.
3. Given the importance of the Gatwick Diamond to the economy of Horsham, and the jobs this generates, ease of sustainable access to centres of economic activity, such as Crawley, will help to support sustainability objectives. This means focusing development close to existing urban areas and railway stations that enable travel by train, particularly in the north of the District.
4. However, expansion through urban extensions could result in some significant environmental effects, for example with respect to biodiversity, the historic environment and landscape. It is notable that all urban extensions could give rise to significant effects on more than one of these factors. Some potential urban extensions could also exacerbate air pollution issues in Air Quality Management Areas. Most also have the potential to result in the loss of best and most versatile agricultural land and all could lead to the sterilisation of mineral resources.
5. It should be noted that some large sites are not that well located in terms of proximity to existing urban areas, such as East of Kingsfold, the Ashington cluster, and the three new settlement proposals at Adversane, Buck Barn and North East of Henfield (Mayfield). Others, such

as West of Billingshurst, are separated from the town by a major road.

6. There may be a role for new settlements, although none of the three proposed new settlements sites are in close proximity to existing railway stations. There is the possibility of a new station at Adversane, and new public transport services would be provided at all the new settlements. New settlements can have long-lead in times, and they need to be of a certain size to achieve a critical mass in terms of jobs, services and facilities. They also introduce new development into locations that currently have little in the way of development apart from the road network. The likelihood of significant negative effects on SA objectives such as biodiversity, the historic environment, landscape, soils and minerals are similar to the large urban extensions.
7. Some of the large site proposals, including both urban extensions and new settlements, will not be fully built-out within the plan period. They therefore offer the opportunity to provide certainty about growth over a longer period, and to provide for a wide range of services and facilities. This applies in particular to West of Ifield, near Crawley, and the new settlement proposal at the North East of Henfield (Mayfield) on the Mid Sussex border. However, both have environmental sensitivities, and their scale (circa 10,000 and 7,000 homes respectively when completed), will significantly alter the character of the areas where they are located.
8. Although large sites, whether urban extensions, are most likely to deliver in a sustainable way the bulk of housing and employment needs, there will be a role for small sites, not only within and close to existing urban areas, but also to support the viability of smaller settlements. There will therefore need to be an appropriate balance between the two. Those growth scenarios that do not provide for small sites to be allocated will not achieve this. Similarly, too much reliance on small sites as opposed to large sites is likely to result in more unsustainable travel patterns, and less opportunity to meet affordable housing needs, and investment in infrastructure.

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