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Horsham District Local Plan Review

Sustainability Appraisal Scoping Report

Prepared by LUC
August 2019

Project Title: Horsham District Local Plan Review Sustainability Appraisal

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1 Introduction

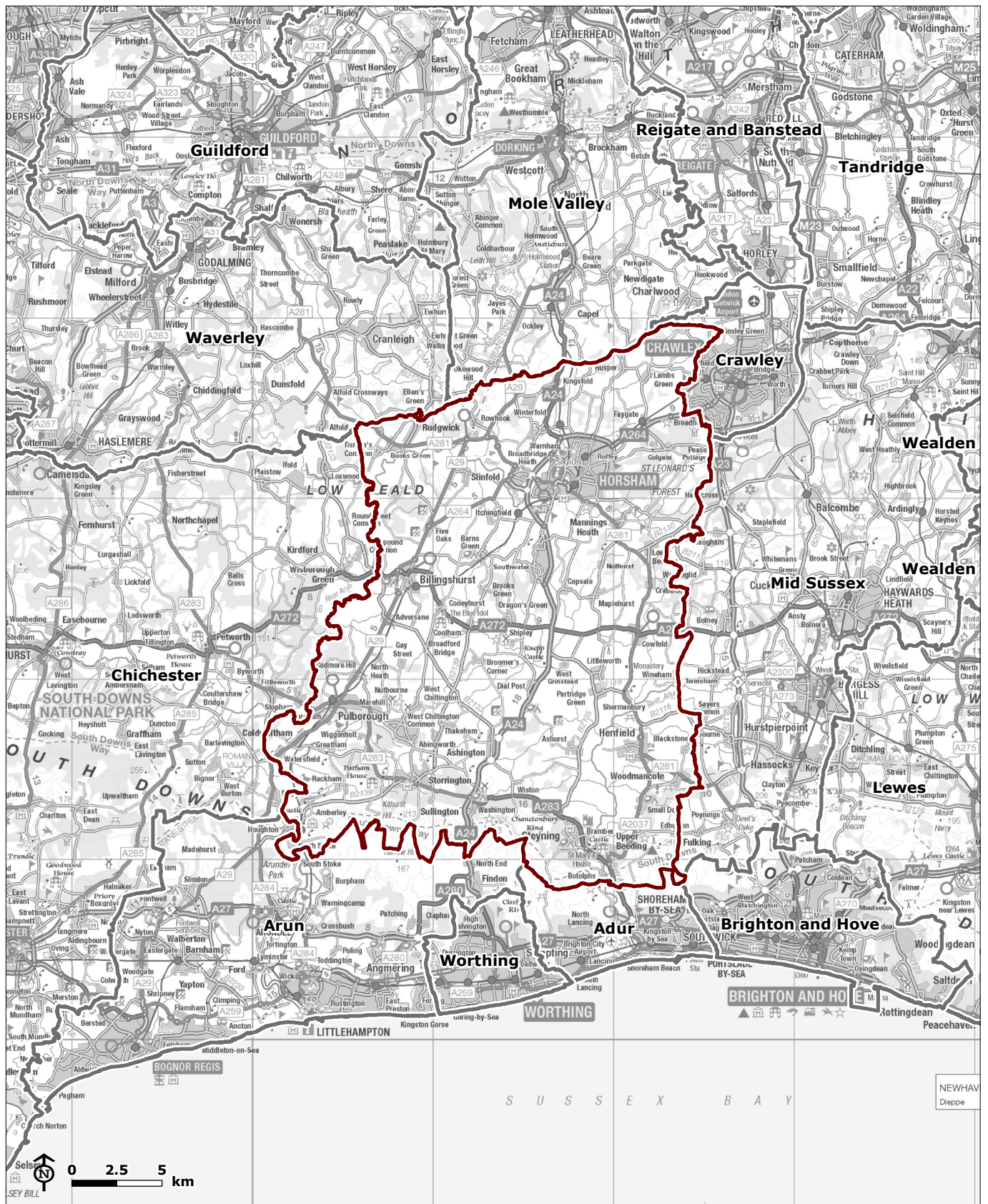
- 1.1 Horsham District Council (the Council) commissioned LUC in March 2019 to carry out a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) as well as Health Impact Assessment and (HIA) and Equalities Impact Assessment (EqIA) of their Local Plan Review.
- 1.2 SA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their alternatives. SA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.
- 1.3 The purpose of a Scoping Report is to provide the context for and determine the scope of the SA of the Local Plan Review and to set out the assessment framework for undertaking the later stages of the SA. It also explains the approach that will be taken to the HIA and EqIA (both of which will be reported on as part of the SA/SEA).
- 1.4 The Scoping Report starts by setting out the policy context of Horsham District's Local Plan Review, before describing the current and likely future environmental, social and economic conditions in the District. This contextual information is used to identify the key sustainability issues and opportunities that the Local Plan Review can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan Review, including strategic policies, site allocations and development management policies. The purpose of this consultation is to seek views on the proposed approach to the SA, in particular:
 - 1) Whether the scope of the SA is appropriate for considering the role of the Horsham District Local Plan Review to help meet and manage Horsham's growth needs and development ambition.
 - 2) Whether there are any additional plans, policies or programmes that are relevant to the SA policy context that should be included.
 - 3) Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Horsham District Local Plan Review.
 - 4) Whether there are any additional SA issues relevant to the Local Plan Review that should be included.
 - 5) Whether the SA Framework is appropriate and includes a suitable set of SA objectives and site-based assumptions for assessing the effects of the options included within the Horsham District Local Plan Review and reasonable alternatives.

Horsham District Local Plan Review

- 1.5 Horsham District Council adopted its current Local Plan, the Horsham District Planning Framework (HDPF), in November 2015, which set out the planning strategy for the District up to 2031. It should be noted that the policies in this document and those which are to be contained in the Local Plan Review document do not apply to land in the South Downs National Park. The planning needs for the National Park area are to be set out in the Local Plan which is currently being prepared by the South Downs National Park Authority.
- 1.6 In line with Government guidance, which state that local authorities should review their Local Plans every five years, the Council has now started the process of reviewing the adopted Local Plan. The Inspector who undertook the independent examination of the adopted Local Plan concluded that further work would be needed by the Council to identify future accommodation

needs, including Gypsies and Travellers and to ensure that sufficient land is made available to meet the needs of businesses and to support economic growth. He also indicated that a review of the plan should commence within three years of the current Local Plan's adoption to ensure that wider long term needs in the District could be met.

- 1.7 The new Local Plan will run from 2019 to 2036 and set the planning strategy for this period to deliver the social, economic and environmental needs of the District. The Local Plan Review process commenced in April 2018 with the publication of an Issues and Options document on Employment, Tourism, Sustainable Rural Development which was subject to public consultation between April and May 2018.
- 1.8 The next stage of the Horsham District Local Plan Review, the Regulation 19 consultation is due to be published in September 2019. The consultation is designed to gather feedback on key issues of particular concern in the District today, the matters most likely to grow in importance over the 18 year period the Local Plan will cover as well as options for addressing key issues and providing for future needs.
- 1.9 The location of Horsham District is shown in **Figure 1.1** below.



- Horsham
- Neighbouring authority

Source: OS

Map Scale @ A4: 1:300,000

**Horsham District Council
Sustainability Appraisal**

**Figure 1.1: Location of
Horsham District**



Sustainability Appraisal and Strategic Environmental Assessment

- 1.10 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations¹. Therefore, it is a legal requirement for the Local Plan Review to be subject to SA and SEA throughout its preparation.
- 1.11 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance²), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Horsham. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.
- 1.12 The SA process comprises a number of stages, with scoping being Stage A as shown in **Figure 1.2** below:

Figure 1.2 Main stages in Sustainability Appraisal

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Stage B: Developing and refining options and assessing effects

Stage C: Preparing the Sustainability Appraisal Report

Stage D: Consulting on the Local Plan Review and the SA report

Stage E: Monitoring the significant effects of implementing the Local Plan Review

Health Impact Assessment

- 1.13 Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. HIA of the Horsham Local Plan Review will be carried out and integrated into the SA and will make recommendations for how the health-related impacts of the Local Plan Review can be optimised as the options are developed into detailed policies.

Equalities Impact Assessment

- 1.14 The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010, but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- 1.15 In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA will be carried out and presented as an appendix to the SA report, setting out how the Local Plan Review is likely to be compatible or incompatible with the duties that Horsham District Council must perform under the Equalities Act 2010.

Habitats Regulations Assessment

- 1.16 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

July 2007 and updated in 2010³ and again in 2012⁴ and 2017⁵. The regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.

- 1.17 The HRA will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

Approach to Scoping

- 1.18 **Figure 1.3** below sets out the tasks involved in the Scoping stage.

Figure 1.3 Stages in SA Scoping

Stage A1: Setting out the policy context for the SA of the Horsham Local Plan Review, i.e. key Government policies and strategies that influence what the Local Plan and the SA needs to consider.

Stage A2: Setting out the baseline for the SA of the Horsham Local Plan Review, i.e. the current and likely future environmental, social and economic conditions in Horsham.

Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Local Plan Review and SA should address.

Stage A4: Drawing on A1, A2 and A3, develop a framework of SA Objectives and assessment criteria to appraise the constituent parts of the Local Plan Review in isolation and in combination.

Stage A5: Consulting on the scope of the SA.

- 1.19 This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Local Plan Review in isolation and in combination. In accordance with National Planning Practice Guidance (PPG), published on-line by the Government, the Scoping Report is proportionate and relevant to the Horsham District Local Plan Review, focussing on what is needed to assess the likely significant effects.

Meeting the Requirements of the SEA Regulations

- 1.20 **Table 1.1** below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements (the remainder will be met during subsequent stages of the SA of the Horsham Local Plan Review). This table will be included in the full SA Report at each stage of the SA to show how the requirements of the SEA Regulations have been met through the SA process.

Table 1.1 Meeting the Requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in this Scoping Report?
Environmental Report	
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	The full SA Report produced to accompany consultation on the Horsham Local Plan Review will

³ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

⁴ The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

⁵ *The Conservation of Habitats and Species Regulations 2017* (Statutory Instrument 2017 No. 1012) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments.

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>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>	constitute the 'environmental report' as well, and will be produced at a later stage in the SA process.
<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>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 Member State 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>	Chapters 1 to 10.
<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>	Requirement will be met at a later stage in the SA process.
<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>	Requirement will be met at a later stage in the SA process.
<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>	Requirement will be met at a later stage in the SA process.
<p>A description of the measures envisaged concerning monitoring in accordance with regulation 17.</p>	Requirement will be met at a later stage in the SA process.
<p>A non-technical summary of the information provided under paragraphs 1 to 9.</p>	Requirement will be met at a later stage in the SA process.
<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> <p>current knowledge and methods of assessment;</p> <p>the contents and level of detail in the plan or programme;</p>	This Scoping Report and the Environmental Reports will adhere to this requirement.

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>the stage of the plan or programme in the decision-making process; and</p> <p>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> <p>(Regulation 12 (3))</p>	
Consultation	
<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>This Scoping Report will be published on Horsham District Council's website for a minimum of five weeks and the three statutory bodies (the Environment Agency, Historic England, and Natural England) informed of the consultation.</p>
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <p>send a copy of those documents to each consultation body;</p> <p>take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</p> <p>inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	<p>Public consultation on the Local Plan and accompanying SA Reports will take place as the Local Plan Review develops.</p>
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <p>notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</p> <p>(Regulation 14 (1))</p>	<p>Unlikely to be relevant to the Local Plan Review, as there will be no effects beyond the UK.</p>
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</p> <p>(Regulation 16(1))</p>	<p>Requirement will be met at a later stage in the SA process.</p>
<p>As soon as reasonably practicable after the adoption of a plan or</p>	<p>Requirement will be met at a later</p>

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>programme:</p> <p>the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>how environmental considerations have been integrated into the plan or programme;</p> <p>how the environmental report has been taken into account;</p> <p>how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> <p>how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	<p>stage in the SA process.</p>
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>	<p>Requirement will be met after adoption of the new Local Plan Review.</p>

Structure of the Scoping Report

- 1.21 This chapter describes the background to the production of the Horsham District Local Plan Review and the requirement to undertake SA and other assessment processes. The remainder of this Scoping Report is structured around a set of SA subject areas designed to draw out the full range of possible sustainability effects generated by the Horsham District Local Plan Review, including all the SEA topics listed in Schedule 2 of the SEA Regulations (2004)
- 1.22 **Chapter 2** describes the relationship of the Horsham District Local Plan with other plans and programmes. Each of the subsequent chapters set out the policy context and baseline for each SA subject area. The subject area chapters are as follows:
- **Chapter 3:** Population Growth, Health and Wellbeing.
 - **Chapter 4:** Economy.
 - **Chapter 5:** Transport Connections and Travel Habits.
 - **Chapter 6:** Air, Land and Water Quality.
 - **Chapter 7:** Climate Change Adaptation and Mitigation.
 - **Chapter 8:** Biodiversity.
 - **Chapter 9:** Historic Environment.
 - **Chapter 10:** Landscape.
- 1.23 SEA Guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and

analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis.

- 1.24 Relevant baseline information will be updated during the SA process as and when data is published.
- 1.25 **Chapters 3 to 10** highlight the key sustainability issues for Horsham District for each subject area and set out their likely evolution without the new Local Plan Review.
- 1.26 **Chapter 11** sets out the SA Framework and explains how this has been developed.

2 Relationship with other plans and programmes

- 2.1 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"*.

Key International Plans, Policies and Programmes

- 2.2 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Local Plan. These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on international nature conservation designations) are identified and can be mitigated.
- 2.3 There are a wide range of other international agreements and EU Directives, which have been transposed into UK law and national policy, which are summarised in the relevant subject area chapters.

National Planning Policy Framework

- 2.4 The most significant national policy context for the Local Plan Review is the National Planning Policy Framework (NPPF) which was originally published in 2012 and revised in 2019⁶. 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."*
- 2.5 The NPPF sets out information about the purposes of local plan-making, stating that plans should:
- *"Be prepared with the objective of contributing to the achievement of sustainable development;*
 - *Be prepared positively, in a way that is aspirational but deliverable;*
 - *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
 - *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
 - *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
 - *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area".*
- 2.6 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- *"Housing (including affordable housing), employment, retail, leisure and other commercial development;*

⁶ Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

- *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *Community facilities (such as health, education and cultural infrastructure); and.*
- *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."*

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

2.8 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.

2.9 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

2.10 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.

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

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

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

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

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

2.14 Nuthurst Parish, Thakeham Parish, Shermanbury and Wineham and Slinfold Neighbourhood Plans were 'made' in August 2015, January 2017, March 2017 and June 2018 respectively. The Warnham neighbourhood Plan was made in Jun 2019. Neighbourhood Plans for the remaining designated neighbourhood plan areas are in various stages of preparation.

Local Plans in adjoining local authorities

2.15 Development in Horsham District will not be delivered in isolation from those areas around it. The effect of delivering new development and supporting infrastructure will often be transmitted across administrative boundaries. As such it will be important to consider the cumulative effect of delivering new development with consideration for growth being proposed in neighbouring authority areas.

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

- To the north east Crawley Borough Council has adopted the Crawley Borough Local Plan 2015 – 2030⁷ which makes provision for the development of a minimum of 5,100 net dwellings and, also as a minimum, an additional 35ha of land for business uses. Crawley Borough Council recently embarked on its Local Plan review and began early consultation on the document from July to September 2019.
- To the north Mole Valley is currently undertaking work on the new Local Plan – Future Mole Valley (Local Plan 2018 - 2033) for which the Issues and Options document⁸ was consulted upon between July and October 2017. The document set out that a residual need for 3,000 new homes over the plan period is to be met through the new Local Plan. The new Local Plan will replace the Core Strategy⁹ (which plans for at least 3,760 new dwellings up to 2026) and the Mole Valley Local Plan 2000¹⁰.
- To the north west Waverley Local Plan Part 1: Strategic Policies and Sites¹¹ was adopted by the Council in February 2018. The Local Plan Part 1 sets out the spatial framework for delivering development which includes at least 11,210 net additional homes and 16,000 sq. m of new Use Classes B1a/b up to 2032. The Preferred Options document for the Local Plan Part 2: Site Allocations and Development Management Policies¹² was consulted upon in the period ending July 2018 and contains policies that direct planning application decisions and identify sites for housing development.
- To the west Chichester District Council has adopted Chichester Local Plan: Key Policies 2014 -2029¹³ which sets out the delivery of 7,388 new homes and 16ha employment floorspace (B1 - B8 class) up to 2032. The Site Allocation Development Plan Document 2014-2029¹⁴ for Chichester District sets out to deliver non-strategic residential and employment sites in the District. Chichester District Council is also currently undertaking work on the Chichester Local Plan Review¹⁵ for which the Preferred Approach consultation was undertaken from December 2018 to February 2019. The Preferred Approach Local Plan Review supports the delivery of 12,478 new homes and net additional 145,835 sq. m of new floorspace for uses in B Use Classes from April 2016 to March 2035.
- To the south west the Arun Local Plan 2011 - 2031¹⁶ 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.
- To the south east Adur Council adopted Adur Local Plan 2017¹⁷ in December 2017 which sets out a housing delivery target of 3,718 homes in the period 2011 to 2032. During the period of time 41,000 square metres of land are to be allocated for appropriate employment uses in the District.
- To the east Mid Sussex District Council adopted Mid Sussex District Plan 2014 – 2031¹⁸ 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.

2.17 The South Downs National Park Authority adopted the South Downs Local Plan in July 2019¹⁹ and this now provides planning policy for the land within the National Park. It covers the period 2014

⁷ Crawley Borough Council (2015) the Crawley Borough Local Plan 2015 – 2030

⁸ Mole Valley District Council (2017) Future Mole Valley Issues and Options: Setting a strategic direction for development

⁹ Mole Valley District Council (2009) Mole Valley Core Strategy

¹⁰ Mole Valley District Council (2000) Mole Valley Local Plan 2000

¹¹ Waverley Borough Council (2018) Waverley Borough Local Plan Part 1: Strategic Policies and Sites

¹² Waverley Borough Council (2018) Local Plan Part 2: Site Allocations and Development Management Policies (Preferred Options Consultation)

¹³ Chichester District Council (2015) Chichester Local Plan: Key Policies 2014 - 2029

¹⁴ Chichester District Council (2019) Site Allocation Development Plan Document 2014 - 2029

¹⁵ Chichester District Council (2018) Chichester Local Plan Review 2035 (Preferred Approach Consultation)

¹⁶ Arun District Council (2018) Arun Local Plan 2011-2031

¹⁷ Adur District Council (2017) Adur Local Plan 2017

¹⁸ Mid Sussex District Council (2018) Mid Sussex District Plan 2014-2031

¹⁹ South Downs National Park Authority (2019) South Downs Local Plan 2014-33

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).

- 2.18 The adopted Local Plan replaces the previously saved policies for the National Park in the Adur District Local Plan (1996)²⁰, Arun District Local Plan (2003)²¹, Chichester District Local Plan First Review (1999)²², Mid Sussex Local Plan (2004)²³ and Horsham Core Strategy ²⁴(2007).

²⁰ Adur District Council (1996) Adur District Local Plan

²¹ Arun District Council (2003) Arun Local Plan 2003

²² Chichester District Council (1999) Chichester District Local Plan First Review

²³ Mid Sussex District Council (2004) Mid Sussex Local Plan

²⁴ Horsham District Council (2007) Horsham Core Strategy

3 Population, Health and Wellbeing

Policy Context

International

- 3.1 **United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention')** (1998): Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.
- 3.2 **United Nations Declaration on Sustainable Development (Johannesburg Declaration)** (2002): Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.
- 3.3 **European Environmental Noise Directive** (2002): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

National

- 3.4 **National Planning Policy Framework (NPPF)**²⁵ contains the following:
- The NPPF promotes healthy, inclusive and safe places which; promote social integration, are safe and accessible and enable and support healthy lifestyles.
 - One of the core planning principles is to *"take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community"*.
 - The plan should *"contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible"*. To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.
 - The framework states that *"access to a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities"*.
 - The NPPF states *"good design is a key aspect of sustainable development"* and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. The importance for planning decisions to result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raise the standard more generally in the area and address the connections between people and places is emphasised.
 - The NPPF promotes the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
 - The framework also seeks to ensure that developments create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.

²⁵ Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

- There is a need set out in the document to take a “*proactive, positive and collaborative approach*” to bring forward development that will “*widen choice in education*”, including sufficient choice of school places.
- Paragraph 72 states that “*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities*”. As such the NPPF provides support for the identification of locations which are suitable for this type of development in a manner which would help to meet needs identified in a sustainable way.

3.5 **National Planning Practice Guidance (PPG)**²⁶ contains the following:

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

3.6 **Select Committee on Public Service and Demographic Change Report: Ready for Ageing?**²⁷: warns that society is underprepared for the ageing population. The report states “*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises*”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

3.7 **Fair Society, Healthy Lives**²⁸: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*”.

3.8 **Planning Policy for Traveller Sites**²⁹: Sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

3.9 **Laying the foundations: a housing strategy for England**³⁰: Aims to provide support to deliver new homes and improve social mobility.

3.10 **Healthy Lives, Healthy People: Our strategy for public health in England**³¹: Sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing, and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.

²⁶ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²⁷ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at: <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>

²⁸ The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at: <http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

²⁹ Department for Communities and Local Government (2015) Planning policy for traveller sites [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

³⁰ HM Government (2011) Laying the Foundations: A Housing Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

³¹ HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf

- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

3.11 **A Green Future: Our 25 Year Plan to Improve the Environment**³²: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
 - Help people improve their health and wellbeing by using green spaces including through mental health services.
 - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.
 - Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

Sub-national

3.12 **Gatwick Diamond Local Strategic Statement 2016 (2017)**³³: The GD LSS provides a framework for joint working and a means to help fulfil the Duty to Co-operate covering common strategic planning and development themes across the Gatwick Diamond authorities. It sets out the long term strategic planning and investment priorities for the Gatwick Diamond area to guide plan making and decision taking for the individual Gatwick Diamond authorities to 2031. The four main purposes of the GD LSS are to:

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

3.13 **Horsham Town Community Partnership 5 Year Plan 2017-2022**³⁴: The HTCP consists of local people, groups, organisations and the local authority. The plan sets out the HTCP's aim of reaching out to the local community on local projects which fall into the categories detailed below. These projects relate to issues such as simple advice, signposting, discussing options, ongoing support, project management or grant applications. The four main types of projects include:

- Make Horsham a better place to live.
- Improve opportunities for all.
- Better health for all.

³² HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

³³ The Gatwick Diamond authorities (2016) Gatwick Diamond Local Strategic Statement [Online] Available at: <http://crawley.gov.uk/pw/web/PUB344429>

³⁴ Horsham Town Community Partnership (2011) 5 Year Action Plan

- Staying and feeling safe.

- 3.14 **Housing Strategy (2013-2015)**³⁵: Sets out a vision, objectives and priorities for housing provision in the District. It aims to increase the delivery of affordable homes, provide effective support for homeless households, provide appropriate housing for vulnerable people and create thriving rural communities in the plan area.
- 3.15 **Housing to Meet Local Needs- Future Delivery (2014)**³⁶: Outlines the Council's Housing Policy Statement regarding deliverability of affordable housing in the District, including a summary of challenges and targets of how to overcome such challenges.
- 3.16 **Strategic Quality Improvement Plan (2014-2019)**³⁷: Sets out a health-care strategy for Sussex. This plan sets out healthcare objectives which include physical and mental wellbeing, staff wellbeing, individualised care and patient care in the right place and closer to home.
- 3.17 **Crawley and Horsham Market Housing Mix Report (2016)**³⁸: The report provides greater detail and clearer analysis of the market housing mix across the two local authorities. It identifies deficiencies in the current housing markets in terms of existing mix and type as well projections for the future. The document also includes recommendations for the future market housing mix and type in both districts. The document related to the findings of the Northern West Sussex SHMA.
- 3.18 **Crawley and Horsham Starter Homes Report (2016)**³⁹: The report supports the two local authorities' adopted Local Plans and aims to aid future plan-making and planning decisions regarding Starter Homes and first time buyers. The document provides an analysis of the scale and nature of 'Starter Homes' requirements and the implications that may arise in terms of securing a mix of affordable housing including affordable rent and intermediate tenures.
- 3.19 **Northern West Sussex Housing Market Assessment - Affordable Housing Needs Model Update (2014)**⁴⁰: The report identifies the affordable housing need in the area broadly covering Crawley, Horsham and Mid-Sussex. The document examines the active housing market including current house prices and the private rental market to give a calculation on affordable housing needs in the Northern West Sussex Housing Market Area and for each of the three constituent local authorities.
- 3.20 **Strategic Housing and Economic Land Availability Assessment (SHELAA) - Housing Report (2018)**⁴¹: The aim of the SHELAA is to provide an assessment of potential housing and economic land in Horsham District and to enable the Council to identify a sufficient supply of deliverable sites to provide five years' worth of housing and identify suitable deliverable sites or broad locations for 6-10 years and 11-15 years where possible. It is an evidence based document used to support the adopted HDPF and its review and emerging Neighbourhood Development Plans.
- 3.21 **Homelessness Prevention Action Plan (2013 (Updated in 2014))**⁴²: The Action Plan commits to preventing homelessness and focuses not only on those households who are homeless or facing homelessness imminently but also on those where future homelessness could be prevented by intervention. This document identifies the specific actions that the Council will undertake to prevent homelessness. These include improving access to training and employment

³⁵ Horsham District Council (2013) Housing Strategy 2013-2015 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/9029/Housing-Strategy-2013-15.pdf

³⁶ Horsham District Council (2014) Housing Policy Statement [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0013/11029/Housing-Policy-Statement-July-2014.pdf

³⁷ NHS Sussex Community (2013) Strategic Quality Improvement Plan 2014/2019 [Online] Available at: <https://www.sussexcommunity.nhs.uk/downloads/about-us/trust-reports/strategies/2017/quality-improvement-plan.pdf>

³⁸ Chilmark Consulting for Crawley Borough Council (CBC) and Horsham District Council (HDC) (2016) Market Housing Mix [Online] Available at: <http://www.crawley.gov.uk/pw/web/PUB311637>

³⁹ Chilmark Consulting (2016) CBC and HDC Starter Homes Needs and Implications [Online] Available at: <http://www.crawley.gov.uk/pw/web/PUB311638>

⁴⁰ Chilmark Consulting (2014) Northern West Sussex HMA- Affordable Housing Needs Model Update [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0008/14102/CD_H_04_NW-Sussex-SHMA-Affordable-Housing-Needs-Update-Final-Report-F071014.pdf

⁴¹ Horsham District Council (2018) SHELAA Housing Report [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf

⁴² Horsham District Council (2014) Homelessness Prevention Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/9032/Homelessness-Prevention-Action-Plan-Update-2014.pdf

opportunities, the role of the voluntary sector, reduce reoffending and work with 16 and 17 year olds to prevent youth homelessness.

- 3.22 **Horsham Infrastructure Delivery Plan (2014)**⁴³: The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the adopted HDPF and to outline how and when these will be delivered.
- 3.23 **Horsham Green Infrastructure Strategy (2014)**⁴⁴: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.
- 3.24 **Sport, Open Space and Recreational Assessment (2014)**⁴⁵: The assessment sets out to ensure that the provision of sports, recreational and open spaces in the District is sufficient, is of an appropriate quality and is in the right place, to meet local needs and in line with the HDPF and NPPF.
- 3.25 **Contaminated Land Inspection Strategy (January 2017)**⁴⁶: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.
- 3.26 **Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (2014)**⁴⁷: The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

Current Baseline

Population

- 3.27 Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification⁴⁸. Population density in the District is 2.48 persons per hectare and this emphasises its more rural character, given that the figure is significantly lower than that of West Sussex as a whole, which has a population density of 4.05 persons per hectare⁴⁹.
- 3.28 The District boasts a total of 23 rural market towns and villages together with a number of other smaller hamlets. In addition to this, the historic market town of Horsham is located in the northern part of the District, acting as an important centre for many local residents. It accommodates 21,000 households, representing 36% of the population. The next largest settlements of Billingshurst, Storrington and Southwater support 4,100 households, 4,400 households and 3,900 households respectively. It should be noted that households do not have the same definition as homes. Households are defined by Office for National Statistics (ONS) as one person or a group of people who have the (same) accommodation as their only or main

⁴³ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

⁴⁴ 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

⁴⁵ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Assessment.pdf

⁴⁶ 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

⁴⁷ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

⁴⁸ 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

⁴⁹ UK Census Data (2011) [online] available at: <http://www.ukcensusdata.com/west-sussex-e10000032#sthash.S5dqgBXz.dpbs>

residence. For groups the individuals in question should share at least one meal a day, or share the living accommodation, that is, a living room or sitting room.⁵⁰

- 3.29 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 a number of housing developments in past years⁵¹.
- 3.30 The majority of the small villages and towns within the District are located along the main road network or provide a good level of access to the network within the District boundaries which takes in the A24, A264, A272, A279, A281 and A283. The location of the Horsham town within 20 minutes from Gatwick International Airport further strengthens the transport offer in the plan area. The District is located midway between London and the South Coast and its proximity to London greatly influences growth and activity in the plan area.
- 3.31 The population of Horsham in mid-2017 was 140,142 compared to the 2011 Census, when 131,300 people lived in the District, across 54,900 households⁵². The resident population has an older age profile compared with England, with 18% aged 0 to 15 years (England, 19%) and 22% aged 65 and over years (England, 18%)⁵³. It is reported that of those residents over 65 years of age, 7,500 live alone and are therefore at greater risk of loneliness⁵⁴. 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%⁵⁵ to 6.2% from 2001 to 2011. A similar trend has been experienced in West Sussex and in the South East in general. The average age in Horsham is 42.1, which is higher than the average for England as a whole which is 39.3⁵⁶. 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.⁵⁷
- 3.32 The pattern of in-migration reflects the growth that Horsham has experienced over the last 20 years. The growth of Horsham District has been greater than that in surrounding areas such as Crawley which has built up to the edge of its administrative boundaries. Districts to the north in Surrey have seen less expansion which is constrained by land designated as Metropolitan Green Belt. Migration in Horsham District is broadly characterised by young adults moving away and new families moving in with children. Most of this movement is from other towns and villages in West Sussex, but there are some flows from south London. The District has also experienced some inward movement of retired people. Possible reasons for this migratory trend could be the general lack of further education opportunities within the District and the low availability of accommodation affordable to those on entry level jobs in the area. Net in-migration fell slightly between 2001 and 2011, which was predominantly due to an increase in the number of 16 to 24 year olds leaving. This was slightly balanced out by an increase in net in-migration of over 25s. In addition, more families appear to be moving into the area with higher numbers of young and adolescent children settling in the District and increases in the number of 35 to 49 year olds and those aged between 0 and 14. Considering all age groups in the District, net in-migration was 1,400 during the 2017 reporting year. This level of net in-migration was slightly lower than the 2016 figure of 1,780⁵⁸.

⁵⁰ Gov.uk (2012) Definitions of general housing terms [Online] Available at: <https://www.gov.uk/guidance/definitions-of-general-housing-terms#household>

⁵¹ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Horsham-Economic-Profile-December-2018.pdf>

⁵² UK Census Data (2011) Horsham [Online] Available at: <http://www.ukcensusdata.com/horsham-e07000227#sthash.1PuT0ZfZ.zziHvNnt.dpbs>

⁵³ 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>

⁵⁴ 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>

⁵⁵ 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

⁵⁶ Horsham District Census Demographics (2011) [Online] Available at: <http://localstats.co.uk/census-demographics/england/south-east/horsham>

⁵⁷ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Horsham-Economic-Profile-December-2018.pdf>

⁵⁸ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Horsham-Economic-Profile-December-2018.pdf>

Housing

- 3.33 In the last five years. Horsham District Council (2013/14 to 2017/18) 4,800 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 (76.2%) of residents living in private housing as opposed to public housing. This proportion is greater than the national average of 65.1%. 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 10.8% of the housing tenure in Horsham is currently socially rented, compared to 16.8% in West Sussex⁵⁹.
- 3.34 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 £300,000⁶⁰. House prices within Horsham Town are however comparable to nearby towns of similar size outside of the District such as Chichester and Haywards Heath. House prices within Horsham District are on average much higher when compared to those within other districts within West Sussex such as Crawley and Worthing. The higher prices within Horsham are influenced by the rural classification of much of the District. Many of the houses are therefore built on larger plots which subsequently results in higher property prices⁶¹.

⁵⁹ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Horsham-Economic-Profile-December-2018.pdf>

⁶⁰ West Sussex County Council (2015) Indices of Deprivation- Horsham [Online] Available at: <https://jsna.westsussex.gov.uk/assets/pdf/maps/Horsham-IMD-2015.pdf>

⁶¹ Horsham District Council (2016) The Horsham District Economic Profile [Online] Available at: <http://www.horshamblueprint.org/wp-content/uploads/2017/05/Horsham-Economic-Profile-December-2016.pdf>

Table 3.1 Comparison of average house prices in Horsham, West Sussex, South East and the UK for 2018

Location	Horsham	West Sussex	South East	UK
Average Property Value	£379,350	£333,354	£326,785	£243,639

- 3.35 Horsham saw a 4% increase in house prices for the period of 2015 to 2016, which is below the 7% average increase in West Sussex. Chichester and Crawley saw the largest growth rates in house prices across West Sussex in the same time period. For Crawley, increases in house prices are likely to be influenced by the relatively short distance to London which makes it an ideal commuter location. The SHMA Update (2014) highlighted that 63.4% of households were unable to afford to buy in the private sector without support, a proportion slightly higher than neighbouring authorities of Mid Sussex (62.7%) and Crawley (62.5%)⁶². Furthermore, the property price to earnings ratio in Horsham District has increased almost threefold in the twenty year period ending in 2018. In 1998 the property price to earnings ratio in the District was 4.8 compared to 9.7 in 2008 and 13.9 in 2018. The 2018 property price to earnings ratio for Horsham in 2018 was significantly higher than the average for England and Wales. Full-time workers for this entire area could expect to pay an estimated 7.8 times their annual workplace-based earnings on purchasing a home⁶³.
- 3.36 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 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 group⁶⁴.
- 3.37 There were 249 gross affordable housing completions for social/affordable rent and intermediate housing during 2017/18 reporting period. This was the highest number of completions of this type for the previous seven years. During the reporting year 2017/18 the Council was able to secure £4,842,239 for affordable housing in the District. The Council monitors affordable housing provision and the housing waiting lists. As of 1 April 2018 there were 592 households on the Council's social housing register. The housing completions in Horsham District are shown below in **Table 3.2**. Five large individual sites contributed to the gross affordable housing figure and these include; Wantley Manor, Henfield West End Lane/Stonepit, Novartis Club, Cowfold and Kilnwood Vale Phase 1D⁶⁵.

⁶² 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

⁶³ Office of National Statistics (2018) Housing Affordability in England and Wales [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>

⁶⁴ 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

⁶⁵ 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

Table 3.2 Housing completions, including affordable housing in Horsham District 2011/12 to 2017/18

Housing category	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Social/Affordable Housing	78	114	125	175	130	154	159
Intermediate (Shared-Ownership)	20	33	114	70	-	70	90
Sub-Total (Affordable)	98	147	239	245	130	224	249
Private Housing	187	366	637	653	1,100	682	924
Total	285	513	876	898	1,230	906	1,173
% affordable housing	34.4%	28.7%	27.3%	27.3%	-	24.7%	21.2%

- 3.38 The District's current housing requirement is 800 dwellings per annum as set out in the HDPF adopted in November 2015. This equates to a 5 year requirement of 4,000 units. Considering the addition of a 5% buffer in line with paragraph 73 of the NPPF, the District's housing requirement for the next 1-5 years is 4,263 units and a further 4,000 units for years 6-10 and years 11-15 thereafter. The SHELAA demonstrates that the Council has enough potential housing sites to meet its five and ten year housing requirements⁶⁶. 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 identified⁶⁷. The gross number of housing completions on previously developed land in recent reporting years has seen an increase from 513 in the 2012/13 AMR to 1,230 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 906, however, the total number has since increased to 1,173 in 2017/18 which is the most recent reporting year. The percentage of completions on previously developed land sites has fallen slightly in 2017/18 from the previous monitoring year from 35.4% to 34.3%⁶⁸. Due to the rural nature of the District there is comparatively less brownfield land present than in the surrounding districts and boroughs.

Gypsy, Traveller and Travelling Showpeople

- 3.39 The Gypsy and Traveller Study (December, 2012) identified that there were 96 gypsy or traveller pitches in the District. The number of identified gypsy and traveller pitches identified in the District in 2018 was recorded 145. Of the 145 recorded, 63 were unauthorised caravans predominantly on private land and 82 were authorised sites with planning permission. Of these authorised sites 47 were socially rented caravans and 35 were private caravans⁶⁹.
- 3.40 The Gypsy and Traveller Study suggested that between 2011 and 2017 there was a need for an additional 39 pitches to be delivered. In the District during the period October 2012 to 1st November 2018, 38 Gypsy and Traveller pitches were granted planning permission on 13

⁶⁶ 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

⁶⁷ 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

⁶⁸ 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

⁶⁹ Horsham District Council (2018) Authority Monitoring Report Housing [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/55710/AMR_2017_2018_CHAPTER_3_Housing.pdf

separate sites. A further 4 plots for Travelling Showpeople were granted planning permission on 1 site during the same period of time⁷⁰.

- 3.41 The Council published a second draft of the Gypsy, Traveller and Travelling Showpeople Development Plan Document (DPD) for consultation in December 2017. The DPD was produced to identify further pitches for Gypsies and Travellers, finding that there were insufficient sites available to meet the identified need of the community. It has therefore been decided that needs for Gypsy, Traveller and Travelling Showpeople will be provided for by updating the Needs Assessment (December 2012)⁷¹, carrying out a new 'Call for Sites' exercise; including a new Gypsy, Traveller and Travelling Showpeople policy in the Horsham Local Plan Review and using the development management process to allow for new sites⁷² where appropriate.

Education

- 3.42 The most up to date records shows that in 2017 there were 83,500 residents aged 16 and over in the District in 2017. For the period January 2018 to December 2018 95.2% of residents aged 16-64 were found to have NVQ Level 1 qualifications or better, 84.5% were found to have NVQ Level 2 qualifications or better, 62.6% were found to have NVQ Level 3 qualifications or better and 43.1% were found to have NVQ Level 4 qualifications or above. This is considerably higher than the regional and UK average, where 89.2% in the South East and 85.4% in the UK have NVQ Level 1 qualifications or better. The percentage of those in Horsham with no qualification for the same period of time has a sample size too small to provide a reliable estimate. 7.8% of the UK population has no qualifications⁷³.
- 3.43 There are 43 primary schools in Horsham District and five secondary schools, of which two have post 16 provision. West Sussex County Council is responsible for the planning, organisation and commissioning of school places in the County, including within Horsham. A number of schools in Horsham are operating at or close to their current pupil capacity. It is expected that large scale development in the District will need to coincide with additional primary and secondary school provision.
- 3.44 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 students⁷⁴. Additional early years' provision was also identified as required to accommodate 98 children. Across the four school planning areas in Horsham, Billingshurst, Horsham East, Horsham West and Steyning/Storrington all have been identified as having net capacity at primary schools as of autumn 2018. However, of the four school planning areas in the District which contain secondary schools, two (Horsham East and Horsham West) were identified as being above 95% full, the figure at which the school planning area is deemed to be full⁷⁵. A new secondary school is identified in the Land North of Horsham development location to meet this need. A temporary site is being provided in Horsham town from September 2019 to meet these emerging needs.

Deprivation

- 3.45 When considering all Indices of Deprivation (2015), the District of Horsham falls within the 50% of least deprived areas in the country. There is however disparity across the local authority area

⁷⁰ 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

⁷¹ Horsham District Council (2012) Gypsy/Traveller, Travelling Showpeople Accommodation Needs Assessment [Online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TSF-21-Horsham-District-GTAA.pdf>

⁷² 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

⁷³ NOMIS Labour Market Profile - Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx?town=horsham#supply>

⁷⁴ 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

⁷⁵ West Sussex County Council (2019) Planning School Places [Online] Available at: https://www.westsussex.gov.uk/media/12383/planning_school_places.pdf

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 Slinfold, Shipley, Sullington, Washington, Billingshurst, Pulborough and around Horsham Park and Roffey in Horsham town⁷⁶.

- 3.46 There are, however, no wards within Horsham which fall within the 30% most deprived areas in the UK⁷⁷. In comparison there are 14 wards in Sussex which lie within the 10% most deprived in England and 26 which lie within the 20% most deprived⁷⁸. Horsham ranked the 304th out of a total of 326 local authorities in England, where 1 is most deprived and 327 is the least⁷⁹.
- 3.47 As reported up to June 2019 the District has a lower proportion of residents (1.1%) who receive Universal Credit than at the regional (1.8%) and national level (2.8%). 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 (1.6%), is higher than the proportion of older people (aged 25 to 49) who receive it (1.3%), the figure for young people is lower than the figure for the South East (2.4%) and Great Britain (3.7%)⁸⁰.
- 3.48 In Horsham in 2016 it was estimated that 7.6% of households (4,374) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 8.4%⁸¹. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

Health

- 3.49 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 care⁸².
- 3.50 Average life expectancy in Horsham is slightly above the national average, being 82.1 for males and 84.6 for females⁸³. Life expectancy is 8.1 years lower for men and 6.6 years lower for women in the most deprived areas of Horsham than in the least deprived areas. Estimated levels of adult excess weight are slightly worse in the District, with an average of 62%, than the England average of 61.3%.
- 3.51 In 2018, Horsham (67.1%) had a slightly lower percentage of adults who consider themselves physically active than West Sussex (68.3%). The figure for the District is however above the national average (66.0%)⁸⁴. The latest update of the Sport England Active People Survey interviewed 500 people in Horsham about their weekly physical activity. It was reported for the October 2015 to September 2016 figures that of those interviewed 34.1% participated in thirty

⁷⁶ West Sussex County Council (2015) Indices of Deprivation- Horsham [Online] Available at: <https://jsna.westsussex.gov.uk/assets/pdf/maps/Horsham-IMD-2015.pdf>

⁷⁷ West Sussex County Council (2015) Indices of Deprivation- Horsham [Online] Available at: <https://jsna.westsussex.gov.uk/assets/pdf/maps/Horsham-IMD-2015.pdf>

⁷⁸ Sussex Community Foundation (2016) Bridging The Gap - IMD overall deprivation by Sussex ward

⁷⁹ West Sussex County Council (2013) Deprivation and Need [Online] Available at: https://www.westsussex.gov.uk/media/3075/8_deprivation.pdf

⁸⁰ NOMIS Labour Market Profile - Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx?town=horsham#supply>

⁸¹ Department for Business, Energy and Industrial Strategy (2016) Sub-regional fuel poverty data 2018 [Online] Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2018>

⁸² NOMIS – Local Area Report (2011) –Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

⁸³ Public Health England (2018) Horsham [Online] Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000008?search_type=list-child-areas&place_name=South%20East

⁸⁴ Public Health England (2018) Horsham [Online] Available at: https://fingertips.phe.org.uk/profile/health-profiles/area-search-results/E12000008?search_type=list-child-areas&place_name=South%20East

minutes moderate intensity sport once a week (at least four sessions in the previous 28 days). This showed slight decrease on figures for April 2015 to March 2016 which was 34.5%⁸⁵.

Open spaces, sports and recreation

- 3.52 95km² land area of the Horsham District is situated within the South Downs National Park⁸⁶, 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 Park⁸⁷.
- 3.53 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 allotments⁸⁸.
- 3.54 The overall quality, quantity and accessibility of existing leisure and recreation facilities in the District is good, with a range of leisure facilities (including three swimming pools, leisure centres, playing fields and parks, allotments and children's' play areas). A total of 1,057,591 visitors at Horsham's leisure centres were recorded during the 2017/18 report period. This represented a 6.5% increase on the number of visitors in the previous reporting period. During the most recent reporting period 41 gross sq. metres of leisure floorspace was completed on two sites outside the Horsham built up area boundary. However, this development resulted in zero net gain in leisure provision in Horsham⁸⁹. In addition other forms of provision for leisure and recreation activities are present in the District, including a cinema, museums, libraries, restaurants and pubs.
- 3.55 A number of strategic recreation routes also pass through the District including the Down's link⁹⁰. 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.
- 3.56 In 2014 an updated audit of the quantity of public accessible sports, recreation and open space across the District was carried out. Of the overall multi-functional greenspace in the District, 25% consists of amenity greenspace, 34% of natural greenspace and 41% of parks and recreation grounds. The total quantity of multi-functional green spaces in the District equates to 15.3m² per person of neighbourhood space, 2.9m² per person of sub-district open space and 2.6m² per person of strategic green space⁹¹.
- 3.57 The Sport, Open Space and Recreation Assessment indicated that there are some shortages in open space and leisure provision in the District and a need for some new provision. This included provision for play, multi-functional greenspaces (MFGS), youth facilities, allotments and indoor tennis courts. In addition, work on green infrastructure provision has also demonstrated that despite the rural character of the District, the amount of accessible green space is limited for

⁸⁵ Sport England (December 2016) Active People Survey

⁸⁶ 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

⁸⁷ 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

⁸⁸ 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

⁸⁹ 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

⁹⁰ 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

⁹¹ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at:
https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Asessment.pdf

some residents, often due to private land ownership or limited public footpath network. Some of the settlements which were identified as most likely to have significant deficiencies in open space provision include Broadbridge Heath and North Horsham^{92 93}. 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

- 3.58 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 44 per 1,000 of the population compared to nationally, 84.7 per 1,000 of the population as of June 2018⁹⁴. The total number of recorded crimes in Horsham in the selected categories has decreased by 4% between the last two monitoring years ending in 2018. Increases in certain types of crime relate to violent crime, weapon use and illegal drug use, at both the County and national levels. At a County level, within West Sussex, anti-social behaviour, robbery and violent crime are the principal contributors to the recorded level of crime and these recorded categories account for over half of all crimes committed⁹⁵.
- 3.59 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 3.3** below gives a selective illustration of crime levels in Horsham⁹⁶.

Table 3.3 Horsham District: Selected recorded crime statistics

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

⁹² 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

⁹³ Kit Campbell Associates for Horsham District Council (2014) Sport, Open Space and Recreation Assessment [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Assessment.pdf

⁹⁴ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Horsham-Economic-Profile-December-2018.pdf>

⁹⁵ UK Crime Stats (2019) West Sussex Police [Online] Available at: <https://ukcrimestats.com/Subdivisions/CTY/2244/>

⁹⁶ 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

Year Crime	2014	2015	2016	2017	2018	Yearly Difference	% Yearly Difference
Person							
Weapons	28	22	59	61	69	8	13%
Public Order	146	385	433	519	540	21	4%
Other	64	106	128	145	125	-20	-14%
Total	7,521	7,693	7,416	7,847	7,572	-275	-4%

- 3.60 Nationally, average crime rates are lower in rural areas than urban areas. For example, in 2016/17, the rate of violence was 14.1 per 1,000 population in predominantly rural areas compared to 22.2 per 1,000 population in predominantly urban areas. This would suggest that the rural areas of Horsham would similarly have a lower rate of violence than the more built up areas⁹⁷.
- 3.61 In 2015-17 there were 274 people killed or seriously injured on Horsham's roads, representing a rate of 65.9 per 100,000 population. This figure was significantly higher than the national rate which was recorded as 40.8 per 100,000 population⁹⁸. 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

- 3.62 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 (AQMA) in the district. **Chapter 6** addresses air pollution in the District in more detail.

Table 3.4 Key sustainability issues for Horsham and likely evolution without Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
The population structure of the District reflects an ageing population and there is potential for increases in the number of families in the area. This has the potential to result in pressures on capacities at local services and facilities including schools and healthcare.	Without the Local Plan Review it is likely that services and facilities will still be delivered. Population growth and demographic change is accounted for through many policies within the HDPF, including Policies 42 and 43 which support the creation of socially inclusive and adaptable environments and the provision of new or improved community facilities or services. However, it is less likely that provision supported through these policies will be in appropriate locations, or of sufficient quality and quantity to keep pace with demands of particular groups. The Local Plan Review offers an opportunity to	SA objective 2

⁹⁷ Crime, January 2018 [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676118/Crime_Jan_2018.pdf

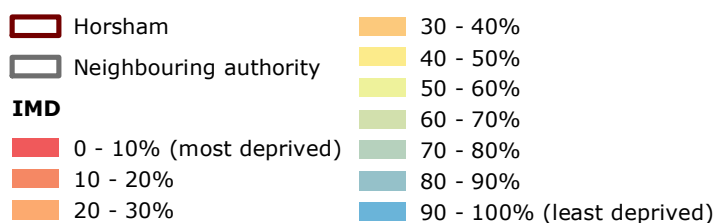
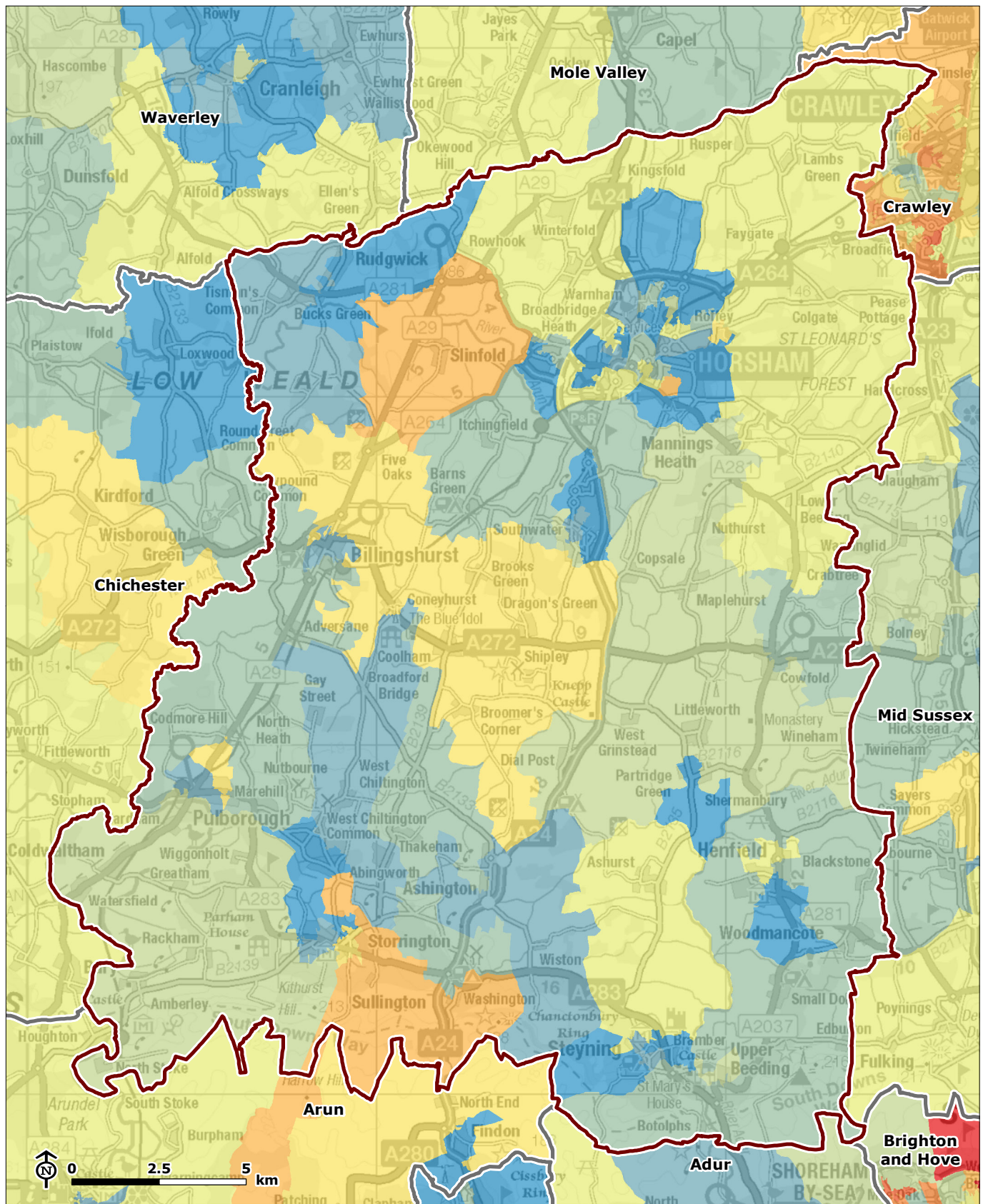
⁹⁸ West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at:

<https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
	deliver the required services and facilities in a coherent, sustainable manner alongside new development.	
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>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, 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>	SA objective 1
Horsham is one of the least deprived local authorities in the UK. However, there are disparities between the least and the most deprived areas in Horsham. A number of wards are within 40% of the most deprived in the UK.	Without the Local Plan Review there is potential for issues of disparity to become more apparent in the District. Policies 15, 16 and 18 in the HDPF seek to address the issue of access to housing within the District, while Policies 42 and 43 seek to support the provision of services and facilities which are likely to help address improve living standards in the District. These policies would continue to apply in the absence of the Local Plan Review. The review process presents the opportunity to build on the thrust of these policies to ensure that indicators of disparity such as access to housing, income deprivation, health deprivation, employment deprivation, living environment deprivation and education skills deprivation are	SA objective 1 SA objective 2 SA objective 3 SA objective 5

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
	appropriately addressed. This approach will also allow for changing circumstances in the District to be more appropriately addressed.	
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.	The topic of health is intertwined with many policies throughout the current HDPF. This includes Policies 40, 42 and 43 which seek to encourage active modes of transport, create socially inclusive and adaptable environments and provide new or improved community facilities or services. However, without the Local Plan Review policies will be less suitable to help prevent any continued rise in levels of obesity in the District, although national campaigns may work to reduce this. The Local Plan Review could further contribute to tackling obesity through policies that more appropriately seek to encourage uptake of active modes of transport and access to green space and other recreation opportunities. The Local Plan Review also presents an opportunity to address health deprivation in the District by supporting the provision of healthcare facilities and other relevant improvements at areas of most need.	SA objective 2 SA objective 3 SA objective 5 SA objective 14
Horsham provides access to a number of important areas of open space and green infrastructure. This includes South Down National Park to the south and High Weald AONB to the north east. A deficiency in recreational or open space provision has been identified in a number of specific areas including provision for 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.	Policies 31, 32, 42 and 43 in the HDPF seek to support the appropriate maintenance and provision of new green infrastructure, open spaces and services and facilities for residents. However, without the Local Plan Review there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas will remain limited. The Local Plan Review offers the opportunity to better address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space and services and facilities. The review process will also allow for new local green spaces to be planned and incorporated alongside new development.	SA objective 2 SA objective 7
In general Horsham is a relatively safe District in which to live. In recent years however certain types of crime such as violent crime, weapon use and illegal drug use have increased in the District.	Policy 33 of the HDPF sets out design principles for new development in the District and these include the incorporation of measures to reduce opportunities for crime. This policy would remain in place in the absence of the Local Plan Review. The Local Plan Review however presents an opportunity to build on the requirement of this policy to encourage aims to make the local environment and streets safer, for	SA objective 4

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



Source: DCLG

Map Scale @ A4: 1:155,000

**Horsham District Council
Sustainability Appraisal**

**Figure 3.1: Index of
Multiple Deprivation (IMD)
in Horsham District**



4 Economy

Policy Context

International

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

National

- 4.2 **National Planning Policy Framework (NPPF)**⁹⁹ contains the following:
- The economic role of the planning system is to contribute towards building a “*strong, responsive and competitive economy*” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.
 - Planning policies should address the specific locational requirements of different sectors.
 - Local planning authorities should *incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”*.
 - When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.
 - The NPPF requires Local Plans to “*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.*”
- 4.3 **National Planning Practice Guidance (PPG)**¹⁰⁰: Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.
- 4.4 **The Local Growth White Paper (2010)**¹⁰¹: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.
- 4.5 **Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)**¹⁰²: Sets out the Government’s Rural Policy Objectives:
- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.

⁹⁹ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹⁰⁰ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁰¹ Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place’s Potential. Available at: <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>

¹⁰² HM Government (2000) Rural White Paper (Our Countryside: the future – A fair deal for rural England) [online] Available at: <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>

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

4.6 **LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)**¹⁰³:

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

Sub-national

4.7 **West Sussex Economic Growth Plan (2018)**¹⁰⁴: A review of the potential for growth in West Sussex and identifies the priority objectives:

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

4.8 **Gatwick Diamond Strategic Business Plan 2018-2021**¹⁰⁵: A vision to concentrate on critical strategic issues, to collaborate with local authority and private sector partners to lobby, influence, inspire and promote the Gatwick Diamond locally, nationally and internationally as the best connected, fastest growing and most dynamic business location.

4.9 **Gatwick Revised Business Plan to 2024**¹⁰⁶: The plan sets out a vision for the airport up to 2024. The vision sets out a number of key elements including improvements in all elements of the passenger journey throughout the airport, growth in passenger traffic to around 37 million towards 2020, growth in non-aeronautical spend per passenger through innovation and improved offerings and £1 billion of capital expenditure between 2014 and 2020.

4.10 **The Coast to Capital Strategic Economic Plan (2018-2030)**¹⁰⁷: The Strategic Economic Plan sets out a statement of ambition and action for the Coast to Capital Local Enterprise Partnership (LEP) towards 2030. The Gatwick Diamond forms an important element of the LEP area comprising the cluster of towns in East Surrey and West Sussex surrounding Gatwick airport. It has a combined economy of £24 billion and 368,000 jobs, representing an economic relationship between the airport and the local area. The plan sets out the eight economic priorities which make up the programme for growth. They are as follows:

- Deliver prosperous urban centres.
- Develop business infrastructure and support.
- Invest in sustainable growth.
- Create skills for the future.
- Pioneer innovation in core strengths.

¹⁰³ LEP Network (2017) Response to the Industrial Strategy Green Paper Consultation [Online] Available at: <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>

¹⁰⁴ West Sussex County Council (2018) West Sussex Economic Growth Plan 2018-2023 [Online] Available at: https://www.westsussex.gov.uk/media/11971/economic_growth_plan.pdf

¹⁰⁵ 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>

¹⁰⁶ Gatwick Airport (2013) A New Deal at London Gatwick Revised Business Plan to 2024

¹⁰⁷ Gatwick 360 (2018-2030) Coast 2 Capital Strategic Economic Plan [Online] Available at: https://www.coast2capital.org.uk/storage/downloads/coast_to_capital_strategic_economic_plan_2018-2030_pdf-1535099447.pdf

- Promote better transport and mobility.
- Improve digital network capability.
- Build a strong national and international identity.

- 4.11 **Horsham Infrastructure Delivery Plan (May, 2014)**¹⁰⁸: The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.
- 4.12 **Horsham Corporate Plan (2016-19)**¹⁰⁹: The Corporate Plan identifies key priorities grouped and presented in four broad headings which cover economic, environmental, social and organizational responsibilities. These priorities are as follows:
- Support communities.
 - Improve and support the local economy.
 - Efficient and great value services.
 - Manage the natural and built environment.
- 4.13 **Horsham Economic Strategy 2017-2027**¹¹⁰: The strategy sets out a vision to be achieved by 2027 and five priorities. The strategy vision sets out to make Horsham a first choice business and visitor destination. The five main priority areas are as follows;
- Securing inward investment, focused on the offer of North Horsham and Novartis in the short term.
 - Promoting enterprise by ensuring there is a range of quality commercial floorspace.
 - Development skills and provide employment opportunities to those who are finding it difficult to get jobs.
 - Infrastructure provision to address the barriers to economic growth including higher speed broadband and mobile coverage.
 - Promoting the district offer by building on current strengths and securing a vibrant visitor economy.
- 4.14 **Horsham Visitor Economic Strategy 2018-2023**¹¹¹: The Partnership's vision for this strategy builds on the Horsham Economic Strategy Vision statement: Think Horsham. The strategy aims to drive success and change across the District with a vision of *Horsham: hub and host*. One main aim for achieving this vision includes *"To increase the benefits the visitor economy brings to the district and monitor its performance focusing on: a. Attracting longer staying visitors and b. Increasing visitor spend across the District"*.
- 4.15 **Horsham Town Centre Vision (Consultation Draft)**¹¹²: The vision sets out an aspirational, comprehensive and deliverable medium term vision (10-15 years) for Horsham Town Centre. This document is to be used by the Council, and others, to seek to ensure proposals reflect the detail of the vision.

Current Baseline

- 4.16 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

¹⁰⁸ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹⁰⁹ Horsham District Council (2016) Cooperate Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/31478/HDC-Corporate-Plan-2016-19-Final-220216.pdf

¹¹⁰ Horsham District Council (2017) [Online] Available at: <https://www.horsham.gov.uk/businesspages/Business-Development/Economic-Strategies>

¹¹¹ Horsham District Council (2017) Horsham Visitor Economic Strategy 2018-2023 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0008/49337/Final-Strategy.pdf

¹¹² Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

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.

- 4.17 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 drink¹¹³.
- 4.18 The Coast to Capital LEP¹¹⁴ 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)¹¹⁵.
- 4.19 The future projected growth to Gatwick Airport is likely to have an influence on employment opportunities accessible to the residents of Horsham. The airport is planning to accommodate growth in air traffic from the 2013 figure of around 34 million passengers, to around 37 million passengers towards 2020. It is predicated that £1bn of capital expenditure will result at the airport between 2014 and 2020. The Masterplan for the airport indicates that the maximum throughput for Gatwick remains above 40 million passengers per annum which is expected to be achieved by the early 2020's¹¹⁶.
- 4.20 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 provision¹¹⁷.
- 4.21 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 psf¹¹⁸.
- 4.22 The decline of British High Streets is reported to be "*getting faster*" however this is a trend which is being experienced across the UK. The growth of e-commerce and changes in consumer habits, have greatly influenced this trend. The town has catchment of around 93,000 and this is considered to be average for its size. Overall the town centre is considered to have a small, strong local economy, which is thriving¹¹⁹.

¹¹³ 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>

¹¹⁴ 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.

¹¹⁵ The Coast to Capital LEP (2018) The Coast to Capital Strategic Economic Plan 2018-2030

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

¹¹⁷ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

¹¹⁸ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

¹¹⁹ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

- 4.23 Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the District with 15.4% of the working population employed in this industry. The next largest sectors are health and social work activities 10.2% and education with 9.6%.¹²⁰
- 4.24 In general it is noted that there is a higher percentage of residents in higher and intermediate occupations as well as self-employment compared with the national average. The lack of higher educational facilities in Horsham has resulted in a low percentage of students in higher or further education in the District. Professional occupation workers are the largest employment group for Horsham (25.5%) followed by associate professional and technical occupations (15.4%) and manager, directors and senior officials (11.5%). Horsham has a higher average wage (£33,789) than that recorded for the South East region (£31,954) and nationally (£29,692)¹²¹.
- 4.25 Horsham District's economically active population reduced to 75.9% in the year ending in December 2018. This figure is below that for the county, region and nation. There has been a large reduction in economically active females down from over 80% to less than 70%. At county, regional and national levels a reverse of this trend has occurred, with more of the population becoming economically active during the same period of time¹²².
- 4.26 Compared to the other local authorities in West Sussex, Horsham has the greatest net imbalance of commuters (-10,126), where the inflow of commuters is 16,728 and the outflow of commuters is 26,854. The highest proportion of workers commuting into Horsham District is from Crawley (14%) and Worthing (12%). There is a higher proportion of workers commuting out to Crawley (23%), Mid-Sussex (8%), all London metropolitan boroughs (6.5%) and Brighton and Hove (6.4%) compared to the proportion of workers commuting in from these locations. These patterns are influenced by Horsham's strong transport links to surrounding areas which provide a strong employment offer. The A24 travels through Horsham and allows for connections to both Crawley and Worthing. Strong links are also provided to London and the South Coast via M23, M25, A24 and A29. Furthermore over 80 rail services are available to London daily¹²³. 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 Crawley¹²⁴.
- 4.27 In total, the gross and net employment floorspace developed within the District for the year 2017/18 was 25,070 m² (the net figure is 20,788 m²). This is substantially higher than that recorded for the 2016/17 year, which was 19,352 m². Over 59% of new employment floorspace developed in the monitoring year was for B8 use (Storage & Distribution). The 2017/18 rate of employment land delivery was the highest record over the past decade, which indicates that in broad terms, the economy has picked up and Horsham District is a desirable business location within the Gatwick Diamond¹²⁵. In regard to unemployment, in 2016 the rate of claimants (people claiming benefit principally for the reason of being unemployed) in the District was 6.0%, compared to 8.3% in the South East and 11.0% in the UK. The percentage of people claiming Job Seekers Allowance in Horsham was 0.5% lower than the national average (1.1%). While there has been a fall across all age categories in terms of the number so people receiving Job Seekers Allowance, 18 to 24 year olds are still more likely to be claiming this benefit than older people. This may be due in part to the lack of further educational facilities and reduced access to entry-level jobs in the District. Of the population in Horsham, 79.1% are economically active which is slightly lower than the figure for the South East region which is 80.9%. This figure reflects the increasingly ageing population in Horsham¹²⁶.

¹²⁰ NOMIS – Local Area Report (2018) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

¹²¹ NOMIS- Local Area Report (2018) Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp>

¹²² 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

¹²³ 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

¹²⁴ 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

¹²⁵ 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

¹²⁶ NOMIS – Local Area Report (2011) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

- 4.28 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 indicator¹²⁷.
- 4.29 The UK is due to leave the European Union. It is uncertain what effect this will have on the Horsham economy.

Table 4.1 Key sustainability issues for Horsham and likely evolution with the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
Horsham is generally seen to be an economically affluent area and the area has a higher average wage than the regional and national average. It forms part of the Gatwick Diamond and Coast to Capital LEP, which allows for links to important economies in the surrounding area. The rural character of the District and close proximity of employment centres such as Crawley, 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.	It is uncertain how the job market will change without the implementation of the Local Plan Review and some degree of change is inevitable, particularly given the uncertainties posed by Brexit. Policies 7, 9, 10 and 11 of the HDPF seek to ensure the growth of new economic and employment opportunities including those for tourism and rural employment and also to protect existing Key Employment Areas. Furthermore Policy 39 addresses the provision of new infrastructure to meet new needs of development including employment growth. However, the Local Plan Review offers the opportunity to create and safeguard jobs through the allocation and promotion of new employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.	SA objective 3 SA objective 16 SA objective 17
While Horsham town centre is currently noted to be performing strongly, the town centre and small town and larger village centres of the District face evolving pressures in terms of outside retail offers of the surrounding areas and the continued importance of e-retailing	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,	SA objective 3

¹²⁷ 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

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
and provision of services online.	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.	

5 Transport Connections and Travel Habits

Policy Context

International

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

National

- 5.2 **National Planning Policy Framework (NPPF)**¹²⁸: Encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.
- 5.3 **National Planning Practice Guidance (PPG)**¹²⁹: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.
- 5.4 **Department for Transport, The Road to Zero (2018)**¹³⁰: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

- 5.5 **West Sussex Transport Plan 2011-2026**¹³¹: The key priorities in this plan are to bring about radical improvements to quality of life for the people and businesses in the County. These priorities include:
- Improvements to the A27 trunk road and complementary public transport improvements to the current bottlenecks at Chichester, Arundel and Worthing (not currently programmed) to increase capacity, improve reliability and safety and increase the competitiveness of local businesses and attract investment.
 - Programmed improvements to the A23 trunk road at the current bottleneck between Handcross and Warninglid to increase capacity and improve the safety record.
 - Maintaining the highway network.
 - Continue working with the community to improve the safety record on local roads, increase usage of healthy and sustainable modes of transport, and provide access to services.

¹²⁸ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹²⁹ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹³⁰ Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

¹³¹ West Sussex District Council (2011) West Sussex Transport Plan [Online] Available at: https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf

- 5.6 **West Sussex Walking and Cycling Strategy 2016-2016**¹³²: The strategy outlines the design and safety principles for walking and cycling that the County Council will follow, and developers will be expected to follow, when implementing infrastructure schemes. The main purposes of the document are as follows:
- To clearly state West Sussex County Council's aims and objectives for cycling and walking between 2016 and 2026.
 - To determine the Council's priorities for funding reflecting the overall walking and cycling aspirations of the Council.
 - To provide guidance in support of prioritising cycling and walking infrastructure in new development.
 - To provide a framework through which local interest and community groups can make suggestions for the development of cycling and walking improvements.
 - To support interested parties in securing additional funding where available.
- 5.7 **West Sussex Rights of Way Management Plan (2018-2021)**¹³³: The plan sets out the vision to *"enable people to enjoy the countryside on foot, by horse and by bicycle, for heath, recreation and to access services"* in the county. The plan aims to work in partnership with volunteers and key organisations to achieve the following objectives:
- Manage the existing Public Rights of Way (PRoW) network efficiently and maintain to an appropriate standard for use.
 - Improve path links to provide circular routes and links between communities.
 - Improve the PRoW network to create safe routes for both leisure and utility journeys, by minimising the need to use and cross busy roads.
 - Provide a PRoW network that enables appropriate access with minimal barriers for as many people as possible.
 - Promote countryside access to all sections of the community enabling people to confidently and responsibly use and enjoy the countryside.
 - Support the rural economy.
 - Support health and wellbeing.
- 5.8 **Horsham Infrastructure Delivery Plan (May, 2014)**¹³⁴: The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.
- 5.9 **Horsham Transport and Development Study (2015)**¹³⁵: The study assessed the relative impact associated with the strategic development sites set out in the HDPF and proposes mitigation measures to accommodate traffic associated with such development.
- 5.10 **Network Rail South East Route: Sussex Area Route Study (May 2015)**¹³⁶: Sets out the strategic vision for the future of this part of the rail network over the next 30 years. The study builds on the recommendation in the Shaw Review that the railway is planned based on customer, passenger and freight needs. The Route Study seeks to identify capacity requirements in the medium and long term to allow the railway to play its part in delivering economic growth, in addition to improving the connections between people and jobs and businesses and markets. It

¹³² West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026 [Online] Available at: https://www.westsussex.gov.uk/media/9584/walking_cycling_strategy.pdf

¹³³ West Sussex County Council (2018) Rights of Way Management Plan (2018-2028) [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp>

¹³⁴ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹³⁵ WSP (2014) Horsham District Transport and Development Study [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0004/50998/CD_IN_01_Horsham-Transport-Study-Rpt-Apr2014.pdf

¹³⁶ 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>

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

- 5.11 **Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)**¹³⁷: The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

Current Baseline

- 5.12 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 more¹³⁸. 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 issues¹³⁹.
- 5.13 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 periods¹⁴⁰. Bus services are generally good within the town of Horsham. Routes 17A/17, 23, 51, 61, 63/63X, 65, 93, 98, 100 and 200 serve the town and provide daily or weekday access of varying frequencies to nearby settlements including Brighton, Worthing, Guilford and Dorking, as well as Gatwick Airport. The town also benefits from a car club service with a number of car club parking bays on North Street and Queen Street¹⁴¹. 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 week¹⁴².
- 5.14 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 junction¹⁴³.

¹³⁷ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

¹³⁸ 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

¹³⁹ Gatwick Diamond Local Strategic Statement Sustainability/Strategic Environmental Assessment Statement [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/3717/GatwickDiamondLSS_SEA.pdf

¹⁴⁰ 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>

¹⁴¹ West Sussex County Council (2015) Getting Around Horsham

¹⁴² West Sussex County Council (2017) Bus route maps and guides [Online] Available at: <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/bus-and-coach-travel/plan-your-journey/bus-route-maps-and-guides/>

¹⁴³ West Sussex District Council (2011) West Sussex Transport Plan [Online] Available at: https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf

- 5.15 The Network Rail Sussex Area Route Study also highlights capacity issues on the railways in the South East and states that the number of passengers using the railway into central London is expected to increase substantially by 2043. There is expected to be a 115% increase on passengers using the faster services and 44% increase of passengers using the stopping services from Sussex into central London. Routes into London are particularly busy, with limited capacity to operate additional services¹⁴⁴.
- 5.16 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 work¹⁴⁵. 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 work¹⁴⁶. 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 population¹⁴⁷.
- 5.17 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.
- 5.18 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 town¹⁴⁸.

Table 5.1 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 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.	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	SA objective 13

¹⁴⁴ 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>

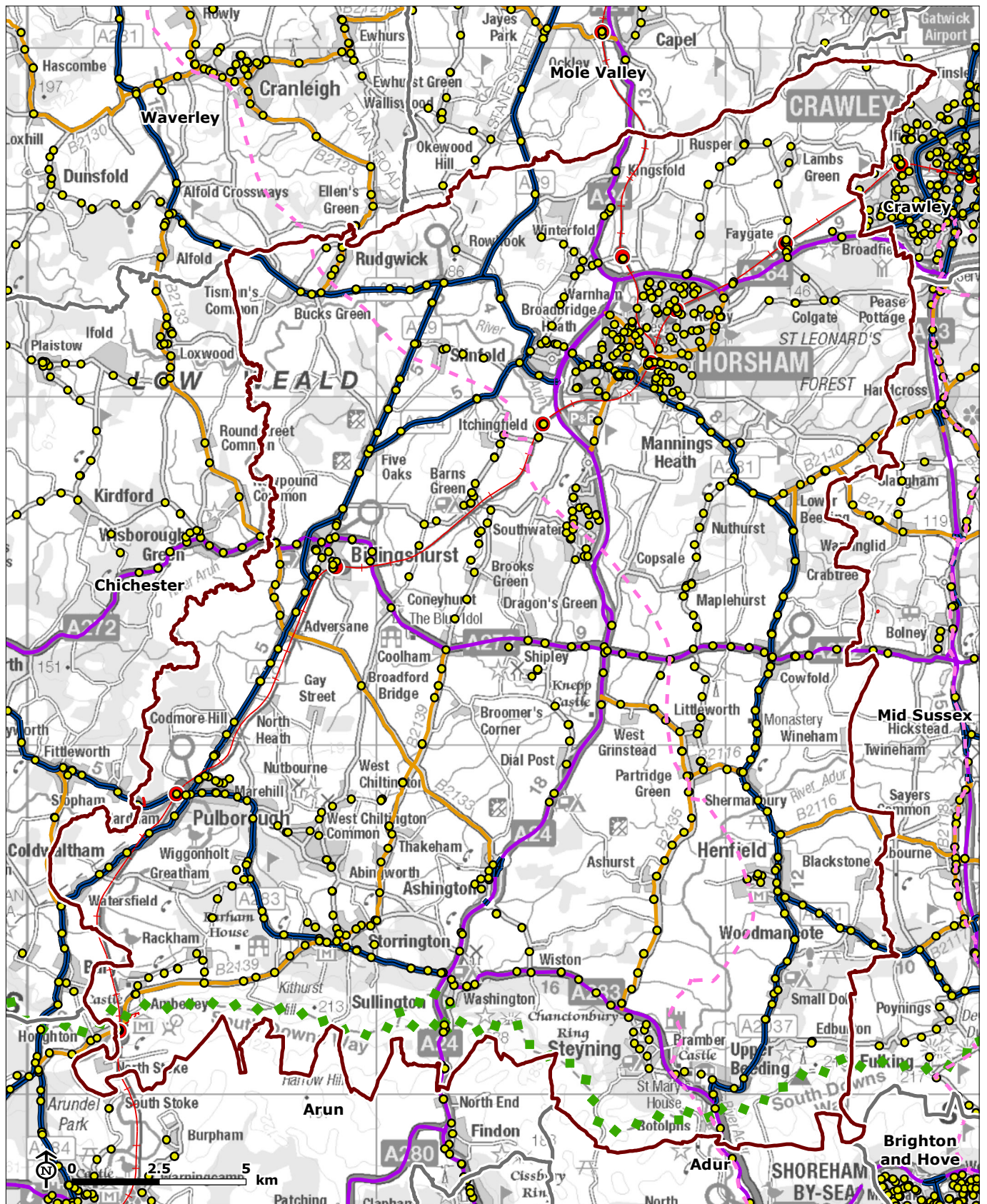
¹⁴⁵ NOMIS method of travel to work (2011) Horsham [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157343?rows=cell&cols=rural_urban

¹⁴⁶ 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

¹⁴⁷ 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

¹⁴⁸ West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026

Key Sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
	<p>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 development is to be provided in the District.</p>	<p>SA objective 13</p>



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

Source: OS, NaPTAN, Natural England, Sustrans

Map Scale @ A4: 1:155,000

**Horsham District Council
Sustainability Appraisal**

**Figure 5.1: Transport Links
in Horsham District**



6 Air, Land and Water Quality

Policy Context

International

- 6.1 **European Nitrates Directive** (1991): Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.
- 6.2 **European Urban Waste Water Directive** (1991): Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.
- 6.3 **European Air Quality Framework Directive** (1996) and **Air Quality Directive** (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.
- 6.4 **European Drinking Water Directive** (1998): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.
- 6.5 **European Landfill Directive** (1999): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.
- 6.6 **European Water Framework Directive** (2000): Protects inland surface waters, transitional waters, coastal waters and groundwater.
- 6.7 **European Waste Framework Directive** (2008): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.
- 6.8 **European Industrial Emission Directive** (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

- 6.9 **National Planning Policy Framework (NPPF)**¹⁴⁹ contains the following:
 - The planning system should protect and enhance soils in a manner commensurate with their statutory status or quality identified in the development plan.
 - New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.
 - “*Despoiled, degraded, derelict, contaminated and unstable land*” should be remediated and mitigated where appropriate.
 - The reuse of previously developed land is encouraged where suitable opportunities exist.
- 6.10 **National Planning Practice Guidance (PPG)**¹⁵⁰: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land

¹⁴⁹ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

for development were it has been demonstrated that significant development is required on agricultural land.

- 6.11 **Waste management plan for England**¹⁵¹: Provides an analysis on the current waste management situation in England, and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.
- 6.12 **National Planning Policy for Waste (NPPW)**¹⁵²: Key planning objectives are identified within the NPPW, requiring planning authorities to:
- Help deliver sustainable development through driving waste management up the waste hierarchy.
 - Ensure waste management is considered alongside other spatial planning concerns
 - Provide a framework in which communities take more responsibility for their own waste
 - Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
 - Ensure the design and layout of new development supports sustainable waste management.
- 6.13 **Safeguarding our Soils – A Strategy for England**¹⁵³: Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.
- 6.14 **Water White Paper**¹⁵⁴: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.
- 6.15 **Water for Life White Paper**¹⁵⁵: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:
- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
 - Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
 - Keep short and longer term affordability for customers at the centre of decision making in the water sector.
 - Protect the interest of taxpayers in the policy decisions that we take.
 - Ensure a stable framework for the water sector which remains attractive to investors.
 - Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut business costs.

¹⁵⁰ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁵¹ Department for Environment, Food and Rural Affairs (2013) Waste management plan for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

¹⁵² Department for Communities and Local Government (2014) National Planning Policy for Waste [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

¹⁵³ Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf

¹⁵⁴ Department for Environment, Food and Rural Affairs (2012) The Water White Paper [online] Available at: <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>

¹⁵⁵ Department for Environment, Food and Rural Affairs (2011) Water for life [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf

- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

6.16 **The Air Quality Strategy for England, Scotland, Wales and Northern Ireland**¹⁵⁶: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

6.17 **Future Water: The Government's Water Strategy for England**¹⁵⁷: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

6.18 **A Green Future: Our 25 Year Plan to Improve the Environment**¹⁵⁸: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency, and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

- Using and managing land sustainably:
 - Embed a 'net environmental gain' principle for development, including natural capital benefits to improved and water quality.
 - Protect best agricultural land.
 - Improve soil health, and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
 - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
 - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

6.19 **UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations**¹⁵⁹: Sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million

¹⁵⁶ Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

¹⁵⁷ HM Government (2008) Future Water: The Government's water strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf

¹⁵⁸ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

¹⁵⁹ Department for Environment Food and Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

- 6.20 **Clean Air Strategy 2019**¹⁶⁰: The strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.
- 6.21 **Department for Transport, The Road to Zero (2018)**¹⁶¹: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

- 6.22 **West Sussex Joint Minerals Local Plan (2018-2033)**¹⁶²: The joint plan sets out key areas which will help shape the future of minerals activities in West Sussex. The plan includes a vision and strategic objectives for sustainable minerals development, 10 policies (Policies M1-M10) to achieve the strategic objectives for minerals development in West Sussex, 15 development management policies (policies 12-26) to ensure no unacceptable harm to the environment, economy or communities of West Sussex and a site allocation set through policy M11 to help meet the need for brick making clay.
- 6.23 **Horsham Infrastructure Delivery Plan (May, 2014)**¹⁶³: The plan sets out what infrastructure is required to support new growth across Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.
- 6.24 **Horsham Green Infrastructure Strategy (April 2014)**¹⁶⁴: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.
- 6.25 **Sport, Open Space and Recreational Assessment (2014)**¹⁶⁵: The purpose of the assessment is to ensure that the provision of sports, recreational and open spaces in the district is sufficient, of an appropriate quality and in the right place, to meet local needs and is in line with the HDPF and NPPF.
- 6.26 **Contaminated Land Inspection Strategy (January 2017)**¹⁶⁶: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.
- 6.27 **Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)**¹⁶⁷: This document aims to provide advice to developers and their consultants on how to

¹⁶⁰ DEFRA, Clean Air Strategy 2019 [online] Available at:

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

¹⁶¹ Department for Transport, The Road to Zero (2018) [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

¹⁶² Wessex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

¹⁶³ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹⁶⁴ 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

¹⁶⁵ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Assesment.pdf

¹⁶⁶ 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

address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

- 6.28 **Cowfold Air Quality Action Plan**¹⁶⁸: The Cowfold AQMA has been in place since 2010 in areas of the village that are likely to exceed air quality objectives for nitrogen dioxide (NO₂). The plan reviews all the possible reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility.
- 6.29 **Storrington Air Quality Action Plan**¹⁶⁹: The Storrington AQMA has been in place since 2010 in areas of the village that are likely to exceed air quality objectives for nitrogen dioxide. The plan reviews all the possible reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility.
- 6.30 **Water for life and livelihoods Part 1: South East River Basin District- River Basin Management Plan (2015)**¹⁷⁰: The management plan sets out four key areas which it seeks to address including preventing the deterioration of water bodies, highlighting areas of land and bodies of water that have specific uses that need special protection, setting out statutory objectives for water bodies and providing a framework for action and future regulation.
- 6.31 **River Adur Catchment Flood Management Plan (2009)**¹⁷¹: The management plan aims to promote more sustainable approaches to managing flood risk.
- 6.32 **Arun and Western Streams Catchment Flood Management Plan (2009)**¹⁷²: The management plan aims to promote more sustainable approaches to managing flood risk.
- 6.33 **Marine Management Organisation Evidence Strategy 2015 to 2020**¹⁷³: This strategy contributes to the delivery of integrated marine management in England. The objective is to establish sustainable levels of economic and social activity in our marine area while protecting the environment.

Current Baseline

Air quality

- 6.34 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.
- 6.35 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.

¹⁶⁷ Horsham District Council (2014) Air Quality Action Plan [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

¹⁶⁸ 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>

¹⁶⁹ 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>

¹⁷⁰ DEFRA and Environment Agency (2015) Water for Life and Livelihoods: Part 1 South East River Basin District [Online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf

¹⁷¹ Environment Agency (2009) River Adur Catchment Flood Management Plan [Online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293867/Adur_Catchment_Flood_Management_Plan.pdf

¹⁷² Environment Agency (2009) Arun and Western Streams Catchment Flood Management Plan [Online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293864/Arun_and_Western_Streams_Catchment_Flood_Management_Plan.pdf

¹⁷³ Marine Management Organisation (2019) Evidence Strategy 2015 to 2020 [Online] Available at:

<https://www.gov.uk/government/publications/evidence-strategy-for-the-marine-management-organisation-mmo/evidence-strategy-2015-to-2020>

- 6.36 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 AQMAs¹⁷⁴.
- 6.37 There are several locations, within Horsham, where levels of (NO₂) exceed the UK and EU air quality standards. Horsham District Council has identified parts of two villages, Storrington and Cowfold, where NO₂ levels exceed the annual mean air quality objective. At high concentrations NO₂ can act as an irritant causing inflammation of the airways and, by affecting the immune cells in the lungs, can increase susceptibility to respiratory infections. Air quality action plans have been developed for both AQMAs^{175 176}. 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.
- 6.38 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.
- 6.39 A number of measures have been taken forward by Horsham District Council in the reporting year of 2017 to help improve local air quality. These include pursuing Traffic Regulation Orders (TROs) at North Street and at the junction of Manley's Hill and School Hill in Storrington, considering the installation of signage to reduce lorry traffic at Cowfold AQMA, an update of the list of air quality planning conditions, and undertaking actions to improve the EV (elective vehicle) charging network in the District and the surrounding areas¹⁷⁷.

Geology and minerals

- 6.40 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 District¹⁷⁸.
- 6.41 West Sussex County Council has designated a number of Mineral Safeguarding Areas for sharp sand and gravel, soft sand, brick clay, chalk and building stone in the West Sussex Minerals & Waste Local Plan (2018-2033)¹⁷⁹. 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.

¹⁷⁴ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

¹⁷⁵ 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>

¹⁷⁶ 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>

¹⁷⁷ Horsham District Council (2018) 2018 Annual Status Report (ASR) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0013/54040/Local-Air-Quality-Management-Annual-Status-Report-2018.pdf

¹⁷⁸ 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

¹⁷⁹ Wessex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

- 6.42 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

- 6.43 Horsham District has a wide variety of soils reflecting the underlying geology which have had an influence on the land use of the area. The most extensive group are the heavy, poorly drained stagnogleys which have developed over the Gault and Weald Clays. They are difficult to cultivate, and traditionally found under grass. However, in recent times improved drainage techniques have significantly extended this area for arable farming. The south of the District is characterised by Rendzinas, a feature of the South Downs, which are often narrow in depth and extensively ploughed for cereal farming. The lower course of the River Adur and Arun, in the south of the district, is characterised by poorly drained silt rich alluvium¹⁸⁰.
- 6.44 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 town¹⁸¹.

Contaminated land

- 6.45 A contaminated land register has been kept in the District since April 2000 and is available for inspection at the Environmental Health Department. There are currently no entries on the register. Due to the history of quarrying throughout Horsham District there are 63 closed landfill sites. In addition, there are two closed sewage works. There are town gas holdings located across the District, including Horsham, Christ's Hospital, Storrington and Steyning¹⁸². These areas are recognised as those at which past use may have resulted in contamination.
- 6.46 Existing land uses of a notable scale in the District which could contribute towards contaminated land areas in the future are as follows: 10 in use landfill sites; eight waste sites; one large sewage treatment works; 37 installation sites (including one Environment Agency regulated, Storrington Oilfield and 2 Brickworks); 16 petrol stations; and seven sites where registered companies are using radioactive substances¹⁸³.

Water

- 6.47 A number of rivers and their smaller tributaries flow through Horsham District. The Adur in the south-east skirts Henfield and then passes between Bramber and Upper Beeding. More substantial tributaries of this watercourse include Blakes Gill and Knepp Mill Stream which flow along much of the route of the A24 towards Southwater as well as Chess Stream, Honeybridge Stream and Lancing Brook. The Arun, which rises in St Leonard's Forest, forms much of the western boundary of the Horsham District and passes through Amberley. Boldings Brook flows to the Arun through Horsham town itself. There are also many natural and man-made ponds and lakes throughout the District. The protection of the surface water quality is an important issue as contamination of these waters has implications on water abstraction, the conservation of existing ecosystems and their amenity value. To the north is the River Mole, this rises in the north east part of Horsham District and flows towards Crawley and through Gatwick Airport and into Surrey.

¹⁸⁰ 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

¹⁸¹ Natural England (2010) Agricultural Land classification Map- London and the South East [Online] Available at: <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

¹⁸² 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

¹⁸³ 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

- 6.48 The District is covered by the River Basin Management Plan for the South East River Basin District. Land within the plan area falls across the Adur and Ouse catchment and Arun and Western Streams catchment. These areas extent beyond the boundaries of the District to include land to the east and west¹⁸⁴.
- 6.49 Priority issues for these catchment areas include fish passage, diffuse pollution, invasive non-native species, channel morphology, elevated phosphate levels and poor fish populations. Actions to improve estuarine and coastal waters by working with relevant local fora and partnerships are also to be developed. Some of the water bodies in these catchments have been identified by the Environment Agency as having 'bad' or 'poor' ecological status, but none have been identified as having 'bad' chemical status^{185 186}.
- 6.50 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 agriculture and rural land management or related to water industry. In Horsham during the 2017/18 monitoring year only one objection to planning applications was received from the Environment Agency on water quality grounds¹⁸⁷.

Table 6.1 Ecological and Chemical Classification for surface waters in Adur and Ouse catchment

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

Table 6.2 Ecological and chemical classification for surface waters in Arun and Western Streams catchment

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

- 6.51 The water companies, Southern Water and Thames Water, supply the majority of the District's drinking water, although only Southern Water abstracts water from within the Horsham District. Pulborough in the south west of the District is located within a Surface Water Drinking Water Safeguard Zone, where the catchment area has an influence on the water quality of the Drinking Water Protected Area. In addition, an area surrounding Pulborough and to the east towards to A24 is identified as a Source Protection Zone¹⁸⁸.

Waste

- 6.52 The District is performing well in terms of achieving a high rate of waste which is sent to be recycled. A total of 52,543 tonnes of household waste was recycled or composted during the

¹⁸⁴ 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

¹⁸⁵ Environment Agency (accessed 2019) Adur and Ouse – Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3000/Summary>

¹⁸⁶ Environment Agency (accessed 2019) Arun and Western Streams - Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3004/Summary>

¹⁸⁷ 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

¹⁸⁸ DEFRA (2019) Magic Map [Online] Available at: <https://magic.defra.gov.uk/MagicMap.aspx>

2017/2018 reporting period. This represents 49.8% of total household waste generated in the District which is slightly lower than the figure at the county level given that 51.3% of household waste was recycled in West Sussex during the same period of time¹⁸⁹.

- 6.53 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 recycled¹⁹⁰.

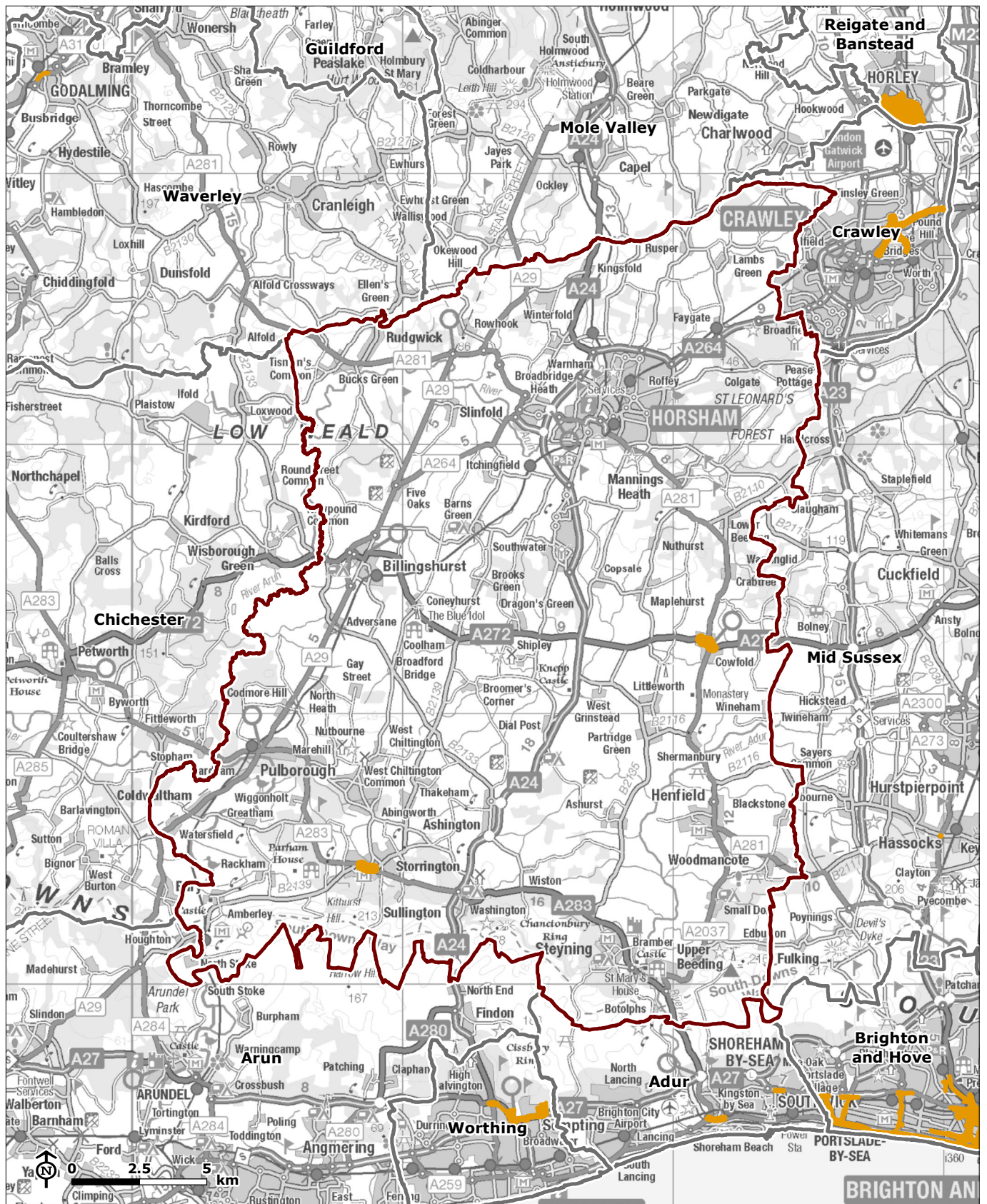
¹⁸⁹ Recycle for West Sussex (2019) [Online] Available at: <http://www.recycleforwestsussex.org/home-recycling/your-recycling-bin/horsham/>

¹⁹⁰ 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

Table 6.3 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
Horsham District Council has two identified AQMAs at Cowfold and Storrington. There are also two AQMAs in close proximity to the north eastern edge of the District at Horley and Crawley and a further AQMA in Hassocks to the East. In addition to potential for exacerbated air quality issues at AQMAs within the District, development within Horsham could have impacts on AQMAs in neighbouring authorities. Similarly there is potential for a cumulative impact of development in neighbouring authorities alongside development in Horsham in terms of air quality at AQMAs in Horsham.	How air quality will change in the absence of a Local Plan Review is in part unknown, given that the District accommodates a high volume of through traffic. Policies 24 and 40 in the HDPF seek to minimise air pollution and protect air quality as well as promoting sustainable transport in the District. Without the Local Plan Review, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air pollution, for example, through cleaner fuels/energy sources. Nonetheless, the Local Plan Review provides an opportunity to contribute to improved air quality in the District through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.	SA objective 14
The District contains a mix of classified agricultural land, the majority being Grade 3, with small areas of Grade 2 and Grade 4. New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.	The HDPF seeks to promote the development of brownfield land which is not of high environmental value through Policy 2. Furthermore the NPPF supports the re-use of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by " <i>recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land</i> ". The Local Plan Review provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.	SA objective 9

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>The District contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.</p>	<p>Without the Local Plan Review it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy M9 of the West Sussex Joint Minerals Local Plan addresses Proposals for non-mineral development within the Minerals Safeguarded Areas.</p>	<p>SA objective 10</p>
<p>Some of the water bodies which flow through the District have been identified by the Environment Agency as having 'bad' or 'poor' ecological status. There are also areas in the District which are covered by a Source Protection Zone.</p>	<p>Without the Local Plan Review it is possible that un-planned development could be located in areas that will exacerbate existing water quality issues, although existing safeguards, such as the EU Water Framework Directive, would provide some protection. Development which occurs within Source Protection Zones presents the risk of contamination from any activities that might cause pollution in the area. Policy 39 of the HDPF requires that sufficient capacity in the existing local infrastructure is provided to meet the additional requirements arising from new development and this is likely to support the delivery of mitigation which would help to prevent water quality issues emerging. The Local Plan Review will provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.</p>	<p>SA objective 11</p>



- Horsham
- Neighbouring authority
- AQMA

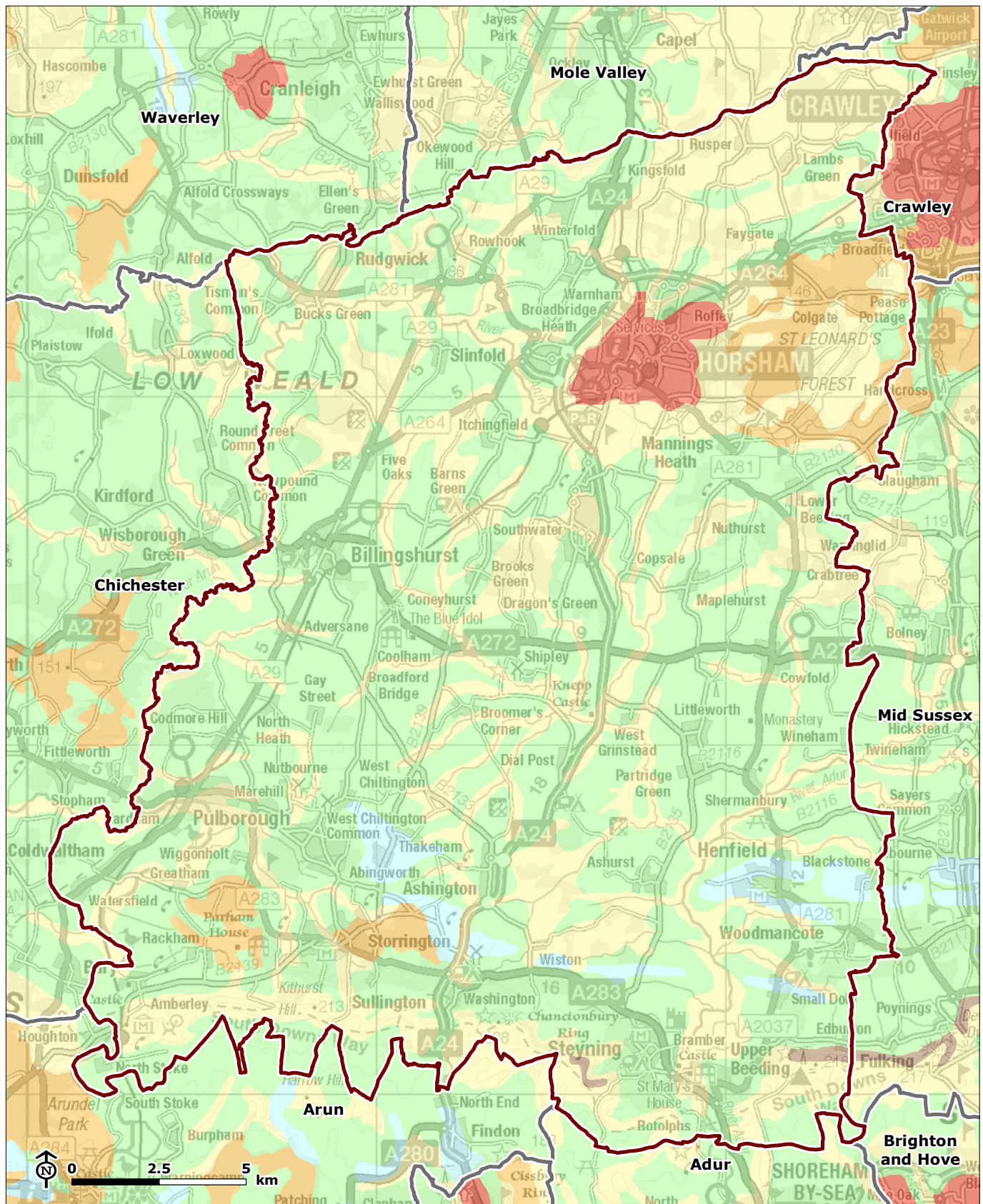
Source: DEFRA, Horsham DC

Map Scale @ A4: 1:200,000

Horsham District Council
Sustainability Appraisal

Figure 6.1: Air Quality Management Areas (AQMA) in Horsham District





 Horsham
 Neighbouring authority

ALC

 Grade 1
 Grade 2
 Grade 3
 Grade 4
 Grade 5
 Non agricultural
 Urban

Source: Natural England

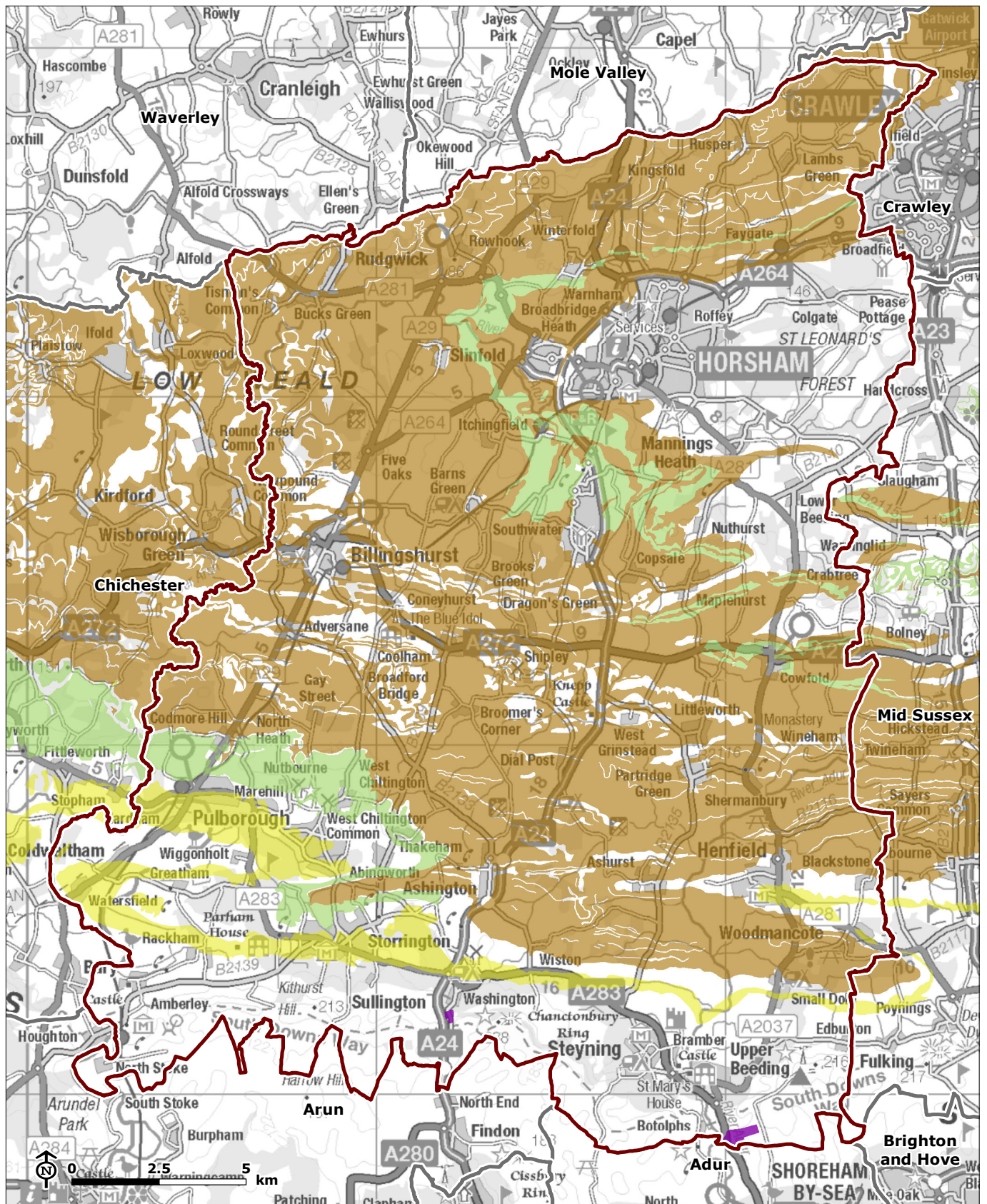
Map Scale @ A4: 1:155,000

Horsham District Council
Sustainability Appraisal

Figure 6.2: Agricultural Land Classification (ALC) in Horsham District



Horsham
District
Council



- Horsham
- Neighbouring authority

Minerals Safeguarding Area (MSA)

- Brick clay
- Building stone
- Chalk
- Soft sand

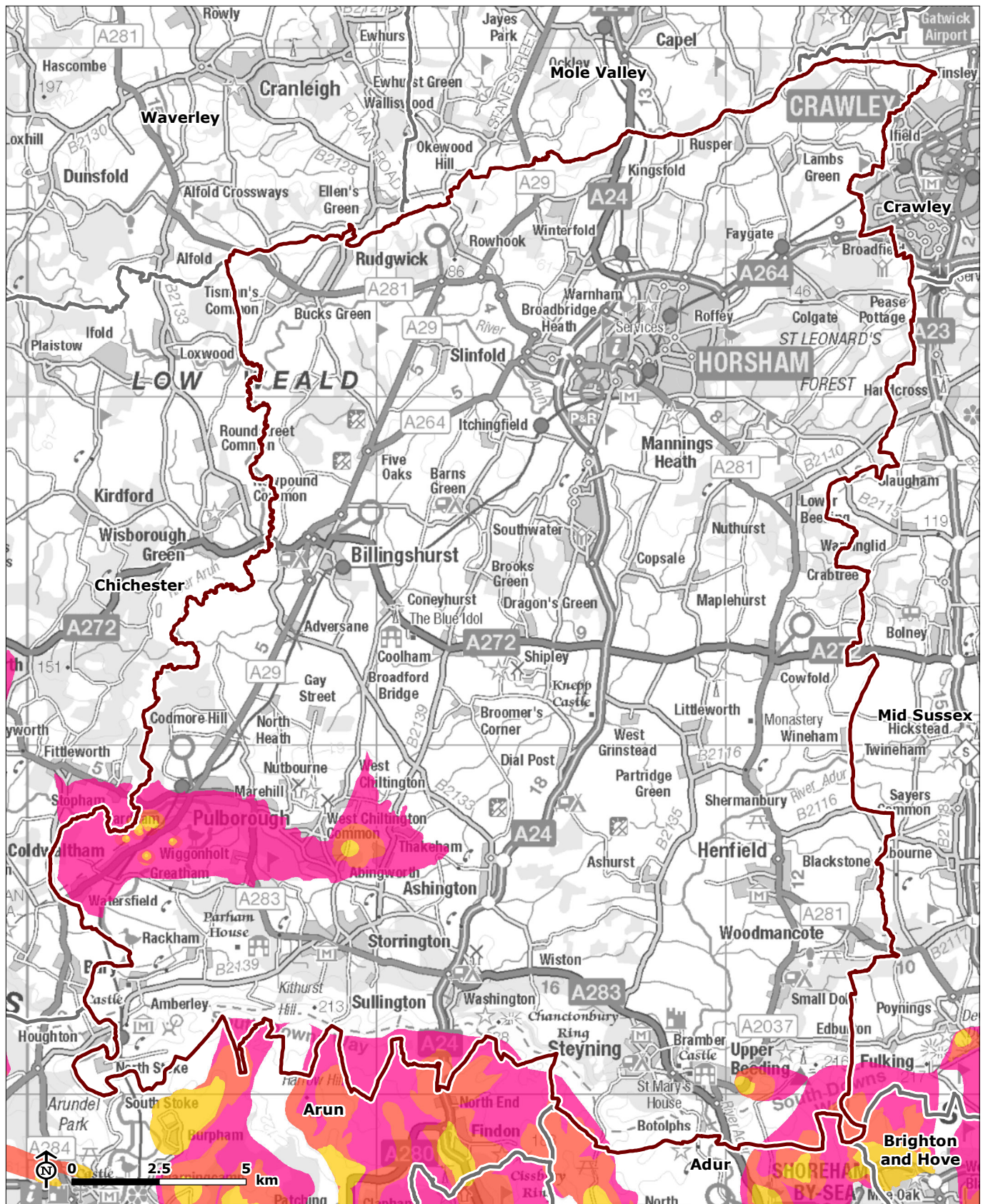
**Horsham District Council
Sustainability Appraisal**

**Figure 6.3: Mineral
Safeguarding Areas in
Horsham District**

Source: Horsham DC

Map Scale @ A4: 1:155,000





- Horsham
- Neighbouring authority
- Source Protection Zone**
- Zone 1
- Zone 1c
- Zone 2
- Zone 2c
- Zone 3

**Horsham District Council
Sustainability Appraisal**

**Figure 6.4: Water Quality
in Horsham District**



Source: Environment Agency

Map Scale @ A4: 1:155,000

7 Climate Change Adaptation and Mitigation

Policy Context

International

- 7.1 **European Floods Directive** (2007): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.
- 7.2 **European Energy Performance of Buildings Directive** (2010): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.
- 7.3 **United Nations Paris Climate Change Agreement** (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

- 7.4 **National Planning Policy Framework (NPPF)**¹⁹¹: Contains the following:
 - One of the core planning principles is to “*support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*”.
 - Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.
 - Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 7.5 **National Planning Practice Guidance (PPG)**¹⁹²: Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.
- 7.6 **Climate Change Act 2008**¹⁹³: Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO₂ emission reductions of at least 26% by 2015, against a 1990 baseline.
- 7.7 **Flood and Water Management Act (2010)**¹⁹⁴: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

¹⁹¹ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹⁹² Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁹³ HM Government (2008) Climate Change Act 2008 [online] Available at: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf

¹⁹⁴ HM Government (2010) Flood and Water Management Act 2010 [online] Available at: http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf

- 7.8 **The UK Renewable Energy Strategy**¹⁹⁵: Sets out the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.
- 7.9 **The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK**¹⁹⁶: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.
- 7.10 **The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate**¹⁹⁷: Sets out visions for the following sectors:
- People and the Built Environment – *“to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”*
 - Infrastructure – *“an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.*
 - Natural Environment – *“the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”*
 - Business and Industry – *“UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”*
 - Local Government – *“Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”*
- 7.11 **Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England**¹⁹⁸: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:
- Manage the risk to people and their property.
 - Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
 - Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.
- 7.12 **A Green Future: Our 25 Year Plan to Improve the Environment**¹⁹⁹: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

¹⁹⁵ HM Government (2009) The UK Renewable Energy Strategy [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf

¹⁹⁶ Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK

[online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf

¹⁹⁷ HM Government (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf

¹⁹⁸ HM Government (2011) Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf

¹⁹⁹ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

Sub-national

- 7.13 **West Sussex Sustainability Strategy**²⁰⁰: The strategy sets out four priorities that update the previous 2011 sustainability actions. The four key priorities of the updated strategy are:
- Embedding sustainability within business.
 - Leading the way in valuing the place of West Sussex.
 - Realising efficiency savings in the short, medium and long term.
 - Working with and influencing others to maximise the benefits for West Sussex.
- 7.14 **Horsham Climate Change Strategy**²⁰¹: Sets out the target to reduce carbon dioxide emissions in the district by 26% up to 2020 and by 80% by 2050. The strategy aims to achieve these targets through the following objectives:
- Reducing greenhouse gas emissions from Council operations and services.
 - Ensuring that measures are taken to prepare the Council's assets and services for likely future changes to the climate.
 - Raising awareness in the wider community about climate change.
 - Working in partnership to reduce carbon emissions and prepare for the future changes to the climate across the District.
- 7.15 **Horsham Green Infrastructure Strategy (April 2014)**²⁰²: This strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.
- 7.16 **Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)**²⁰³: The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District.
- 7.17 **River Adur Catchment Flood Management Plan (2009)**²⁰⁴: The management plan aims to promote more sustainable approaches to managing flood risk.
- 7.18 **Arun and Western Streams Catchment Flood Management Plan (2009)**²⁰⁵: The management plan aims to promote more sustainable approaches to managing flood risk.

²⁰⁰ West Sussex County Council (2015-2019) Sustainability Strategy [Online] Available at: https://www.westsussex.gov.uk/media/7357/sustainability_strategy.pdf

²⁰¹ Horsham District Council (2009) Acting together on Climate Change- A Strategy for the Horsham District [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0004/9319/CD_EN_13_Climate-Change-Strategy-2009.pdf

²⁰² 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

²⁰³ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

²⁰⁴ Environment Agency (2009) River Adur Catchment Flood Management Plan [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293867/Adur_Catchment_Flood_Management_Plan.pdf

²⁰⁵ Environment Agency (2009) Arun and Western Streams Catchment Flood Management Plan [Online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293864/Arun_and_Western_Streams_Catchment_Flood_Management_Plan.pdf

Current Baseline

- 7.19 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

- 7.20 The Met Office has released the UK Climate Projections 2018 study (UKCP18) that provides up to date information on how the climate of the UK is expected to change in the period up to the end of the 21st Century. In the highest emissions scenario, which may result based on current emissions reduction trends, summer temperatures in the UK could be 5.4C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario. Winters could be up to 4.2C warmer, with up to 35% more rainfall by 2070.
- 7.21 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 day²⁰⁶.
- 7.22 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.
- 7.23 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 winters²⁰⁷. The Environment Agency has produced peak river flow allowances by river basin district which account for variation due to climate change. **Table 7.1** below shows the potential change identified for the given time periods for the South East river basin district within which Horsham falls.

Table 7.1 Peak river flow allowances for South East river basin district (1961 to 1990 baseline)²⁰⁸

Allowance Category	Total potential change anticipated for 2015-2039	Total potential change anticipated for 2040-2069	Total potential change anticipated for 2070-2115
Upper End	25%	50%	105%
Higher Central	15%	30%	45%
Central	10%	20%	35%

²⁰⁶ 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>

²⁰⁷ 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

²⁰⁸ GOV.UK (2016) Flood Risk Assessments: Climate Change Allowances [Online] Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Climate change mitigation

- 7.24 West Sussex is committed to a target of reducing the County's emission from the 2011/12 baseline by 50% by 2025. In addition, Horsham District aims for an emission reduction of 80% by the year 2050. As **Table 7.2** below demonstrates that there has been a year on year reduction in the total CO₂ emissions for the County between 2014 and 2017 with the exception of 2016. Domestic carbon emission for the District fell by 83.5 kilotonnes between 2005 and 2014, with domestic gas and electricity sales also falling during this time period by 150 GWh and 16 GWh respectively. This indicates that residents in Horsham are actively improving energy efficiency in their homes and/or are improving their energy consumption habits²⁰⁹. These points considered, Horsham District has the highest tonnage of carbon dioxide emissions in the County (684.5kt CO₂)²¹⁰ and has the third highest per capita emissions of 4.9 tonnes of CO₂ emissions per capita²¹¹.

Table 7.2 Total CO₂ Emissions percentage change from previous year in West Sussex

Year	2014	2015	2016	2017
Total Emission % Reduction	-7%	-18%	+9%	-12%

- 7.25 For the year 2005 Horsham had an average rate of 8.0 tonnes of CO₂ emissions per capita, however in 2017 the rate decreased to 4.9 tonnes per capita. **Table 7.3** shows CO₂ (kilotonne) emissions for Horsham for 2005 and 2016 across industrial, domestic and transport sectors. As shown **Table 7.3**, there has been a reduction between 2005 and 2016 across all sectors and transport accounts for the largest amount of CO₂ emissions.²¹²

Table 7.3 CO₂ emissions in Horsham (shown as kt)

Year	Industrial and Commercial	Domestic	Transport	Total
2005	341.9	340.7	349.9	968.8
2016	206.9	239.0	315.7	684.5

- 7.26 In the context of planned growth in the South East additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure West Sussex meets its targets and benefits from the opportunities for innovation in these sectors. In addition to reducing carbon emissions from existing sources, efforts to reduce the overall energy consumption and carbon emissions are being made through improvements to Part L of the Building Regulations. In conjunction with Sussex Building Controls Horsham District Council has produced the guidance document 'Creating High Performance Sustainable Buildings' which provides advice and information for architects, designers, engineers, developers and builders on creating sustainable buildings²¹³.

²⁰⁹ Horsham District Council (2017) Home Energy Conservation Act: Progress Report for 2017-19 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/46382/HECA-Report-2017-to-2019.pdf

²¹⁰ UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2016 Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

²¹¹ West Sussex County Council (2017) WSCC 2017 Emissions Report [Online] Available at: https://www.westsussex.gov.uk/media/9070/co2_emissions_report.pdf

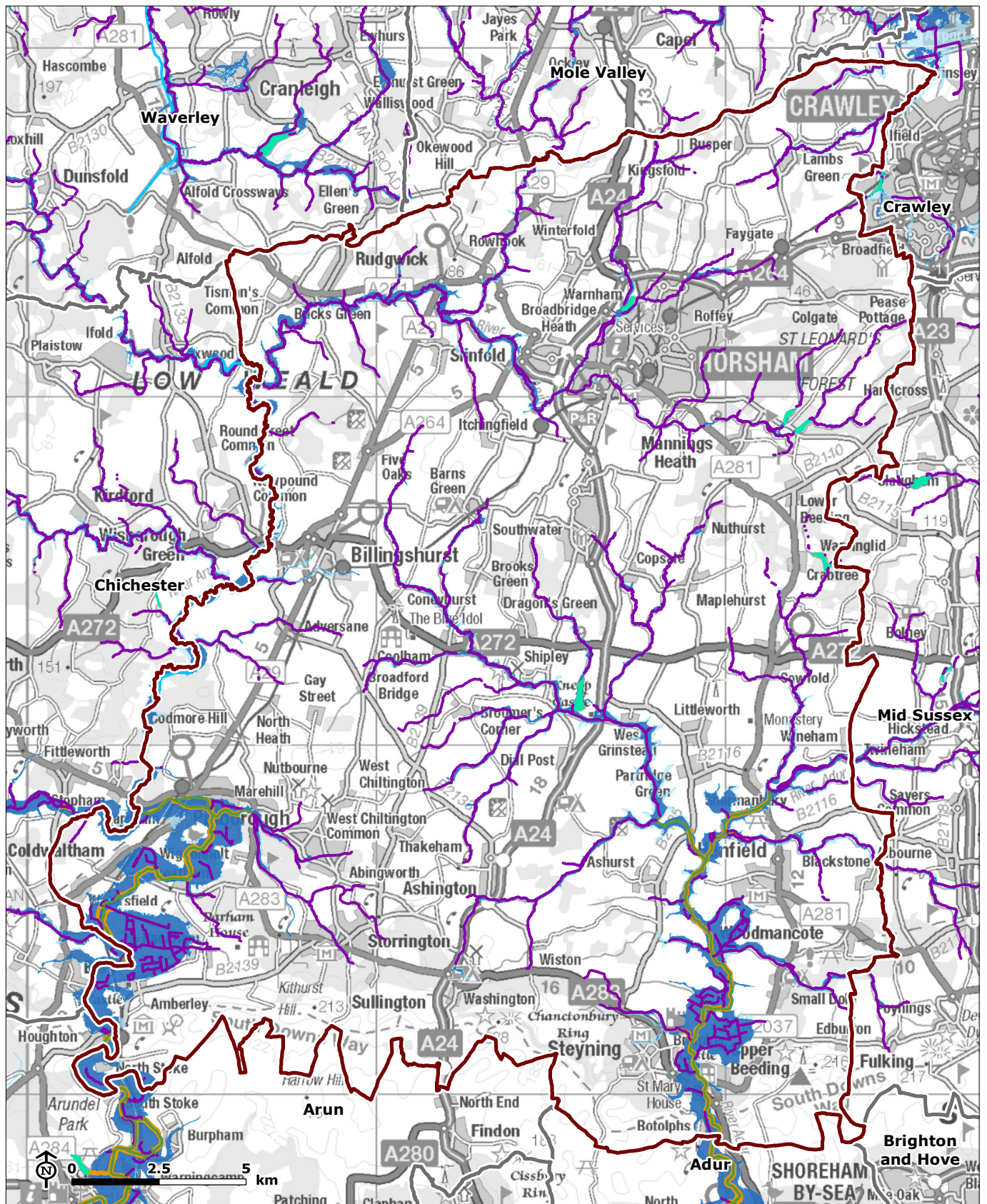
²¹² UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2016 Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

²¹³ Horsham District Council and Sussex Building Control (2009) Creating High Performance Sustainable Buildings [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/3484/Sustainability_Booklet_Low_Res.pdf

Table 7.4 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
Climate change is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The rural character of the District means that there are likely to be difficulties with regards the delivery of measures to help reduce greenhouse gas emissions. While average energy consumption among residents in Horsham has fallen in recent years the District still has the highest carbon dioxide emissions in the County. The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings.	Climate change is likely to have on-going effects regardless of the Local Plan Review, considering the scale of the challenge this issue poses. The HDPF already includes policies seeking to address this issue, including Policy 35 which supports development which makes a clear contribution to mitigating and adapting to the impacts of climate change. The obligation of the Council to reduce carbon emissions will also remain with or without the Local Plan Review. The Local Plan Review provides an opportunity to strengthen policies which seek to act positively in terms of climate change contributions. An important part of this overall approach will be to help limit the need to travel in the District through the appropriate siting of new development. The Local Plan Review will also present opportunities to encourage low-carbon design, promotion of renewable energy and sustainable transport infrastructure delivery.	SA objective 12 SA objective 15
The effects of climate change in the District are likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.	Policy 35 of the HDPF is supportive of design and construction measures which provide resilience to climate change. Whilst the Local Plan Review will not influence extreme weather events, it can build upon the approach of current planning policy to ensure adaptation through design and better respond to current circumstances. This is likely to include building orientation, shading including tree planting, protection against extreme weather events in the public realm including public transport facilities, the use of SuDS and green infrastructure as well as promotion of water conservation and recycling.	SA objective 12 SA objective 15
Flood risk in Horsham is dominated by fluvial flooding which is the source of most risk. The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding could increase	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	SA objective 12 SA objective 15

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
in the District as a result of climate change.	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.	



- Horsham
- Neighbouring authority
- Canal
- River
- Tidal river
- Flood defences
- Lake
- Flood zone 3
- Flood zone 2

Source: Environment Agency, Ordnance Survey

Map Scale @ A4: 1:155,000

**Horsham District Council
Sustainability Appraisal**

**Figure 7.1: Flood Risk in
Horsham District**



8 Biodiversity

Policy Context

International

- 8.1 **International Convention on Wetlands (Ramsar Convention)** (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.
- 8.2 **European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention)** (1979): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).
- 8.3 **International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.
- 8.4 **European Habitats Directive** (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.
- 8.5 **European Birds Directive** (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.
- 8.6 **United Nations Declaration on Forests (New York Declaration)** (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

National

- 8.7 **National Planning Policy Framework (NPPF)**²¹⁴: Encourages plans to “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation*”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.
- 8.8 The framework states that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is also to be supported through planning policies and that there should also be support for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 8.9 **National Planning Practice Guidance (PPG)**²¹⁵: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.
- 8.10 **Natural Environment and Rural Communities Act 2006**²¹⁶: Places a duty on public bodies to conserve biodiversity.

²¹⁴ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

²¹⁵ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²¹⁶ HM Government (2006) Natural Environment and Rural Communities Act 2006 [online] Available at: http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

- 8.11 **Biodiversity 2020: A strategy for England's wildlife and ecosystem services**²¹⁷: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.
- 8.12 **Biodiversity offsetting in England Green Paper**²¹⁸: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.
- 8.13 **A Green Future: Our 25 Year Plan to Improve the Environment**²¹⁹: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:
- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
 - Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
 - Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

Sub-national

- 8.14 **A Living Landscape for the South East**²²⁰: Sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The documents highlights the following issues:
- There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide ('ecosystem services'). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.
 - Better access to the natural environment helps improve mental and physical health, and improves quality of life. There is a need to bring wild places to more people, and bring more people into wild places.
 - Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.

²¹⁷ Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

²¹⁸ Department for Environment, Food and Rural Affairs (2013) Biodiversity offsetting in England Green Paper [online] Available at: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf

²¹⁹ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

²²⁰ The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: http://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf

- Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

- 8.15 **West Sussex Minerals Sites- Biodiversity Action Plan**²²¹: An action plan which sets out the mineral sites within West Sussex which are of biodiversity importance in terms of both habitats and species. The action plan identifies a number of actions to help protect and enhance the sites identified.
- 8.16 **West Sussex Road Verges Habitat Action Plan**²²²: The action plan sets out the notable road verges in West Sussex and particular objectives and measures to help protect the habitats and the species concerned.
- 8.17 **Horsham Green Infrastructure Strategy (April 2014)**²²³: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.
- 8.18 **South Downs National Park Partnership Management Plan (2014-2019)**²²⁴: The five year strategy sets out policy for the management of the South Downs National Park. The fundamental approach which underpins the PMP is delivering sustainable development which is considerate of achieving support for an ecosystem approach and mitigating and adapting to climate change. The plan also embodies the principles of green infrastructure, and seeks to provide opportunities to address and make good use of green infrastructure assets at a landscape scale, to deliver a wide range of benefits to people. The National Park Authority is currently undertaking a Partnership Management Plan Review. This review will incorporate new ideas on how to manage protected landscapes and produce a new Priority Action Plan cover the period up to 2024.

Current Baseline

- 8.19 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.
- 8.20 Approximately 8% of the land area of the District is designated for its importance in nature conservation terms. The Arun Valley Special Protection Area (SPA) and RAMSAR site comprises 1% of the District's area and is of international importance for a number of bird species that overwinter at the site. Part of this area is also designated as a Special Area of Conservation (SAC). Other international designations which development in the plan area has the potential to impact upon include the Mens SAC which is within Chichester to the west. This site is of importance for its beech forest habitats and barbastelle bat and was screened in and included as part of the Habitats Regulations Assessment for the HDPF. There are also 23 Sites of Special Scientific Interest (SSSIs) which are of importance for nature conservation or geology, 70 locally important Sites of Nature Conservation Importance (SNCIs) and 22 Regionally Important Geological Sites (RIGS) as designated by WSCC²²⁵.

²²¹ Sussex Biodiversity Partnership (2004) West Sussex Minerals Site Biodiversity Action Plan [Online] Available at: file:///C:/Users/field_I/Downloads/West%20Sussex%20Mineral%20Sites%20-%20A%20Biodiversity%20Action%20Plan.pdf

²²² Sussex Biodiversity Partnership (2003) West Sussex Road Verges Habitat Plan [Online] Available at: file:///C:/Users/field_I/Downloads/West%20Sussex%20Road%20Verges%20Habitat%20Action%20Plan.pdf

²²³ 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

²²⁴ South Downs National Park Authority (2013) South Downs National Park Partnership Management Plan 2014-2019 [Online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

²²⁵ 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

- 8.21 42.5% of all SSSIs in West Sussex are in a favourable condition. 49.3% of the remaining SSSIs are in unfavourable but recovering condition. Only 5.5% of SSSIs in West Sussex were found to be in declining condition²²⁶. In addition monitoring of local designations, shows that 76% of SNCIs and 64% of RIGS are in positive conservation management.
- 8.22 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%²²⁷.
- 8.23 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 Adur²²⁸. This approach is to be linked to the targeted landscape-scale approach to conserving biodiversity in Sussex.

Table 8.1 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

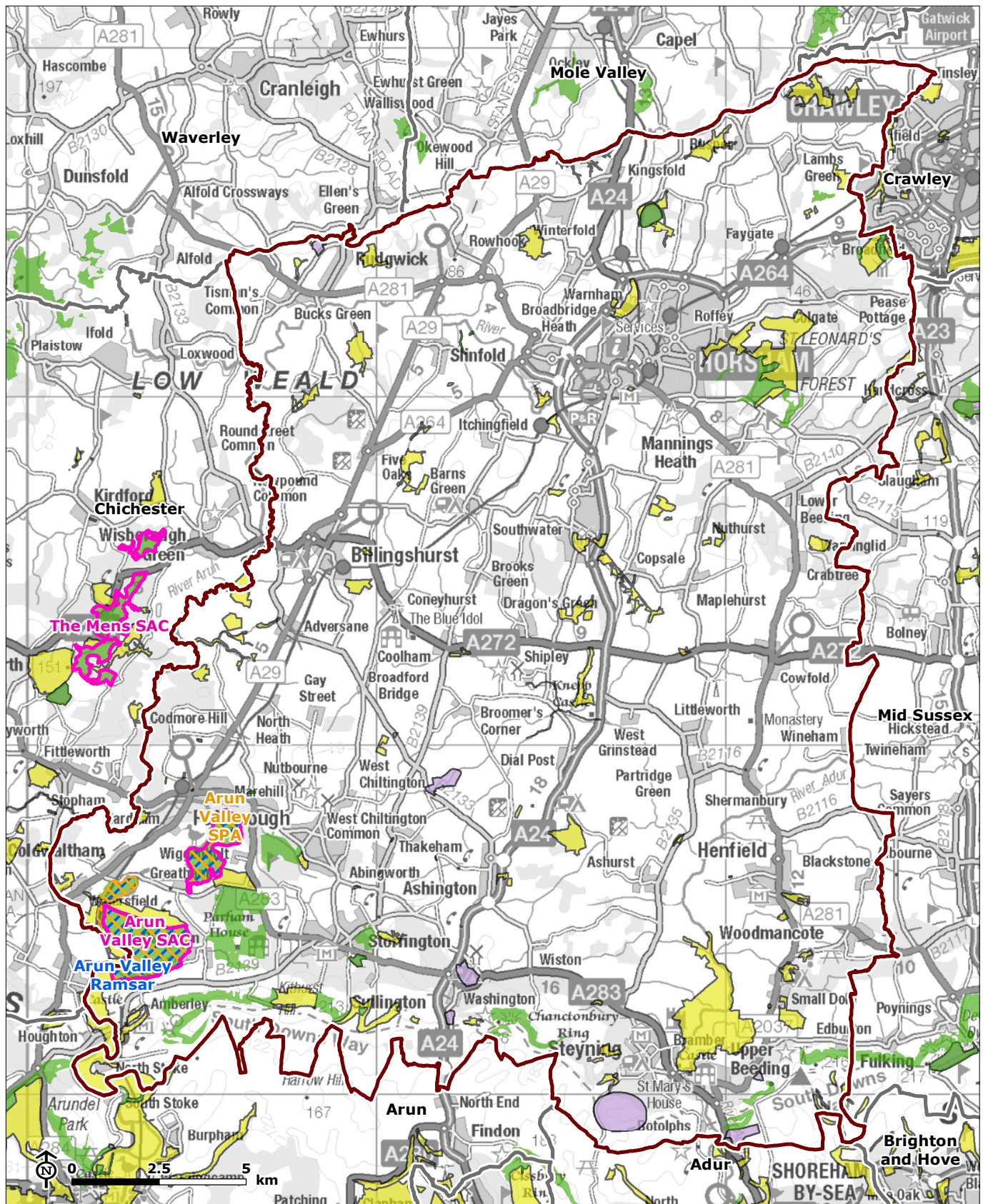
Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance.	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	SA objective 6

²²⁶ Horsham District Council (2018) Authority Monitoring Report – 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

²²⁷ 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>

²²⁸ 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

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
	further insight into biodiversity impacts specifically at European sites presenting the opportunities to limit adverse impacts at such locations.	
Although designated sites represent the most valued habitats in the District, the overall ecological network is important for biodiversity as a whole, helps to support the health designated sites, and allows species to migrate in response to climate change. Fragmentation and erosion of habitats and the wider ecological network is an ongoing threat to biodiversity.	Erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. In addition, Policy 31 of the HDPF requires development proposals to contribute to the enhancement of existing biodiversity, and to create and manage new habitats where appropriate. The policy also supports development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks. The Local Plan Review provides the opportunity to ensure that the policy is working as planned and is up-to-date with current thinking and evidence.	SA objective 6 SA objective 15



- 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**

**Figure 8.1: Biodiversity
and Geodiversity
Designations in Horsham**



9 Historic Environment

Policy Context

International

- 9.1 **European Convention for the Protection of the Architectural Heritage of Europe (1985):** Defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.
- 9.2 **Valletta Treaty (1992)** formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)²²⁹: Aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

- 9.3 **National Planning Policy Framework (NPPF)**²³⁰: Plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place."
- 9.4 **National Planning Practice Guidance (PPG)**²³¹: Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify specific opportunities for conservation and enhancement of heritage assets.
- 9.5 **The Government's Statement on the Historic Environment for England 2010**²³²: Sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.
- 9.6 **The Heritage Statement 2017**²³³: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to

²²⁹ Council of Europe (1992) Valletta Treaty [online] Available at: <https://rm.coe.int/168007bd25>

²³⁰ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

²³¹ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²³² HM Government (2010) The Government's Statement on the Historic Environment for England 2010 [online] Available at: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>

²³³ Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf

maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

- 9.7 **Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8**²³⁴: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Sub-national

- 9.8 **West Sussex Local Design Guide**²³⁵: Sets out County guidance for good design measures which complement national planning policy as well as other local planning guidance. It aims to achieve high standards of design and construction. Areas of focus include Masterplanning, Visibility, Street Layout and Parking. Improvements are to be achieved by promoting a common approach to the main principles which form the basis for Local Planning Authorities' criteria for assessing planning applications.
- 9.9 **Billingshurst Village Centre Supplementary Planning Document (2017)**²³⁶: The purpose of this SPD is to ensure the future vitality and viability of Billingshurst, by promoting it as a destination and creating a flexible village centre. The SPD, alongside the Community-led plan, also provides a framework and point of focus for HDC and the key community partners in taking forward projects in the village centre.
- 9.10 **Horsham Town Plan Supplementary Planning Document (2012)**²³⁷: The Council aims to steer future development in the town centre to maximise economic potential whilst sustaining and enhancing its attractive and historic environment to the benefit of residents and visitors. The Horsham Town Plan SPD provides planning guidance for future retail, commercial and leisure development in Horsham town centre.
- 9.11 **West of Horsham Masterplan Supplementary Planning Document (2008)**²³⁸: This document includes the requirement and policies for the development of a major mixed-use scheme including 2,000 homes on the land adjoining the western side of Horsham and to the south of Broadbridge Heath.
- 9.12 **Land West of Horsham Design Principles and Character Areas Supplementary Planning Document (2009)**²³⁹: This document aims to provide guidance on design matters for developers and others preparing or considering planning applications. Site specific design guidance reinforces the policies of the LDF and the West of Horsham Masterplan SPD which will ensure that the future development is appropriate and of high quality.
- 9.13 **Storrington Old Mill Drive Diamond Planning Brief Supplementary Planning Document (2008)**²⁴⁰: This planning brief sets out the Council's guidelines and vision for any future development of the Old Mill Drive Diamond site in Storrington. The aim of the document is to guide prospective developers through the Council's development plan policy, encourage efficient and effective joined-up future development, and promote stronger links between the site and the wider town centre.

²³⁴ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 [online] Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/>

²³⁵ West Sussex County Council (2008) Local Design Guide [Online] Available at: <https://www.westsussex.gov.uk/media/1840/2910602.pdf>

²³⁶ Horsham District Council (2017) Billingshurst Village Centre SPD [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0009/44757/Adopted-Billingshurst-Village-Centre-SPD-March-2017.pdf

²³⁷ Horsham District Council (2012) Horsham Town Plan SPD [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3518/Horsham_Town_Plan_SPD_2012.pdf

²³⁸ Horsham District Council (2008) Land West of Horsham Masterplan SPD [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/30713/West-of-Horsham-Masterplan.pdf

²³⁹ Horsham District Local Development Framework (2009) Land West of Horsham Design Principles and Character Areas SPD [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/50961/WoH-Design-Principles-SPD.pdf

²⁴⁰ Horsham District Local Development Framework (2008) Storrington Old Mill Drive Diamond Planning Brief SPD [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/50959/OldMillDriveAdopt.pdf

Current Baseline

- 9.14 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.
- 9.15 There are over 1,860 Listed Buildings in the District together with 37 Conservation Areas, 77 Scheduled 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. Nine of the conservation areas have adopted character statements. These highlight the broad character of the area as well as the features which contribute to the special character of these areas and should be preserved or enhanced. Conservation Areas in Horsham which have adopted character statements are; Amberley, Billingshurst, Bramber, Henfield, Horsham, Pulborough, Slinfold, Steyning and Storrington. In addition, there are also a number of historic parks and gardens in the District, including:
- Leonardslee Gardens.
 - Parham House.
 - St Mary's House.
 - Horsham Park.
- 9.16 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 building entry, three 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 works²⁴¹. Horsham in comparison with other local planning authorities in West Sussex, has the third highest number of assets on the Heritage at Risk Register, after South Downs and Chichester²⁴².

Table 9.1 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

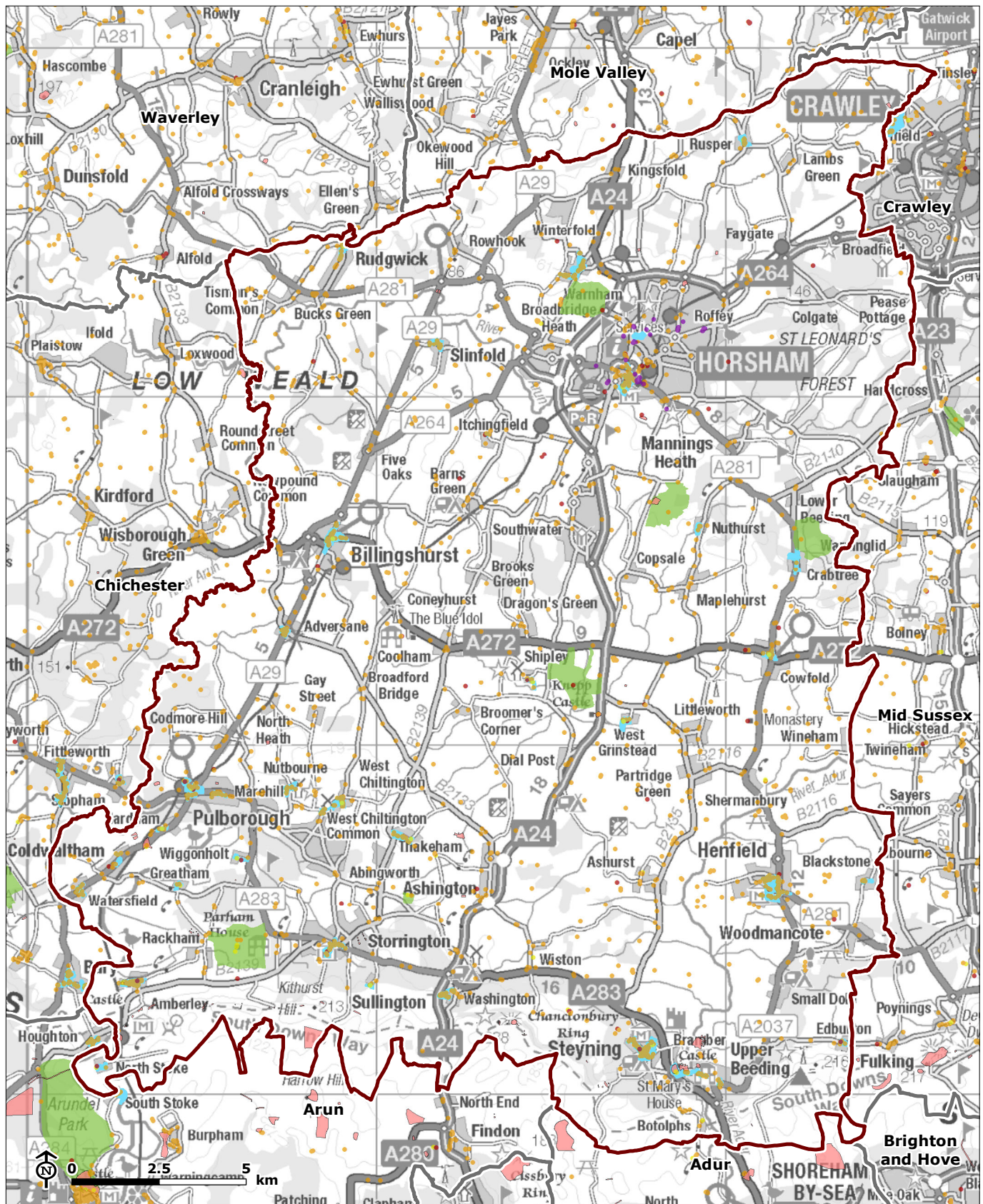
Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
There are many sites, features and areas of historical and cultural interest in the District, some of which are at risk and identified on the Heritage at Risk Register. These assets may be particularly 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	SA objective 8

²⁴¹ 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

²⁴² Historic England (2018) Heritage at Risk South East Register [Online] Available at: <https://historicengland.org.uk/images-books/publications/har-2018-registers/se-har-register2018/>

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
	be made to the policy position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.	



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

Source: Historic England, Horsham DC

**Horsham District Council
Sustainability Appraisal**

**Figure 9.1: Horsham
District's Historic
Environment**



Map Scale @ A4: 1:155,000

10 Landscape

Policy Context

International

- 10.1 **European Landscape Convention** (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

- 10.2 **National Planning Policy Framework (NPPF)**²⁴³: Planning principles include:
- Recognising the intrinsic beauty and character of the countryside.
 - Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
 - Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.
- 10.3 **A Green Future: Our 25 Year Plan to Improve the Environment**²⁴⁴: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this chapter are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:
- Working with AONB authorities to deliver environmental enhancements.
 - Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

Sub-national

- 10.4 **High Weald Area of Outstanding Natural Beauty: Management Plan 2019-2024**²⁴⁵: The Plan sets out the long term policy objectives and short term targets for conserving and enhancing the natural beauty of the High Weald AONB. The management plan also provides a description of the High Weald and its history, the vision for the AONB, an introduction to the legislation and principles of the plan, the Statement of Significance, a description of the state of the High Weald landscape, and a section on implementation and monitoring.
- 10.5 **South Downs National Park Partnership Management Plan (2014-2019)**²⁴⁶: The five year strategy sets out policy for the management of the South Downs National Park. The fundamental approach which underpins the PMP is delivering sustainable development which is considerate of achieving support for an ecosystem approach and mitigating and adapting to climate change. The plan also embodies the principles of green infrastructure, and seeks to provide opportunities to address and make good use of green infrastructure assets at a landscape scale, to deliver a wide range of benefits to people. The National Park Authority is currently undertaking a Partnership

²⁴³ Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

²⁴⁴ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

²⁴⁵ 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>

²⁴⁶ South Downs National Park Authority (2013) South Downs National Park Partnership Management Plan 2014-2019 [Online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

Management Plan Review. This review will incorporate new ideas on how to manage protected landscapes and cover the period up to 2024.

- 10.6 **South Downs Green Infrastructure Framework**²⁴⁷: The Framework sets out guidance on green infrastructure planning for the South Downs National Park and the wider region. The aim of the framework is: *"to create, protect and enhance a connected network of green and blue spaces; which sustainably meets the needs of local communities and supports the special qualities of the South Downs National Park."*
- 10.7 **A Strategy for the West Sussex Landscape**²⁴⁸: The five-year programme for West Sussex aims for higher quality development and land management practices which respect to the character and environment of the County. The key aim of this strategy is to protect and enhance the landscape of West Sussex as an asset for future generations.
- 10.8 **Horsham Green Infrastructure Strategy (April 2014)**²⁴⁹: This strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

Current Baseline

- 10.9 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 woodlands²⁵⁰.
- 10.10 Horsham District has a settlement pattern of mainly small to medium sized towns and villages, and dispersed hamlets/farmsteads with traditional building materials of flint, brick, sandstone, half timber and tiles still strongly evident locally. Churches, spires and the occasional windmills form the sparse skyline of the landscape. The west of the District remains largely tranquil with a rural character. The north-east of the District, around Horsham town and Crawley, and major transport corridors across the District act to influence parts of Horsham²⁵¹.
- 10.11 The Horsham District Landscape Character Assessment identified 32 separate landscape character areas across the District. Fifteen of these character areas were found to be in good condition with 17 areas found to be in declining condition. The areas of decline tended to be nearer to centres of higher populations such as around Horsham, Steyning, Bramber and Upper Beeding and Henfield. In addition, 22 character areas were also found to be sensitive to change.
- 10.12 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.
- 10.13 The landscape assessment of the region shows the distribution of the 16 District Landscape Character Types in Horsham. The character types are summarised below:

²⁴⁷ South Downs Authority (2016) South Downs Green Infrastructure Framework [Online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2016/12/South-Downs-Green-Infrastructure-Framework-March-2016.pdf>

²⁴⁸ West Sussex County Council (2005) A Strategy for the West Sussex Landscape [Online] Available at: https://www.westsussex.gov.uk/media/1771/landscape_strategy.pdf

²⁴⁹ 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

²⁵⁰ 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

²⁵¹ 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

- Open Upper Downs (Open expansive arable landscape of hills and dry valleys).
- Major Dry Valley (Broad dry valleys with linear woodland strips).
- Scarp (Steep and dramatic north facing slopes).
- Rolling Scarp Footslope Farmlands (Smooth rolling topography for mixed farming uses).
- Pasture/Woodland and Heath Mosaic (Patchwork of pasture, woodland and heath).
- Mixed Farmlands and Horticulture (Regular fields of arable farmland).
- Wooded Small Scale Farmlands (Small scale pasture fields with strong wooded character).
- Wooded Ridges (Low wooded ridges and tall hedgerows).
- Broad Clay Vale Farmlands (Broad vale of mixed pasture and arable fields).
- Narrow Clay Vale Farmlands (Flat/gently undulating narrow clayvale landscape).
- Forest Ridges and Ghyll Farmlands (Frequent and varied in size deciduous woodland).
- Open Ridge and Valley Farmlands (Open ridges and predominantly arable farmlands).
- Major River Valleys (Wide, flat open floodplain).
- Minor River Valleys (Narrow alluvial floodplain)²⁵².

- 10.14 The findings of the Horsham District Landscape Character Assessment were built upon by the Council through the Landscape Capacity Study²⁵³ 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.
- 10.15 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.
- 10.16 6.77% of land within Horsham is located within the High Weald AONB²⁵⁴. Land within the AONB has been designated for its special landscape quality, which makes it potentially more susceptible to development. A number of High Weald Joint Advisory Committee (JAC) Annual Reviews have been completed by the High Weald AONB body. The latest review published for the 2017/18 reporting period and identified that there were 78 planning application consultations received from local authorities across the AONB during this period. This included the Land to the west of Phase 1 Kilnwood Vale housing development proposal in the District. During the same period of time the AONB body also provided written input for one planning appeal in Horsham²⁵⁵.

²⁵² 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

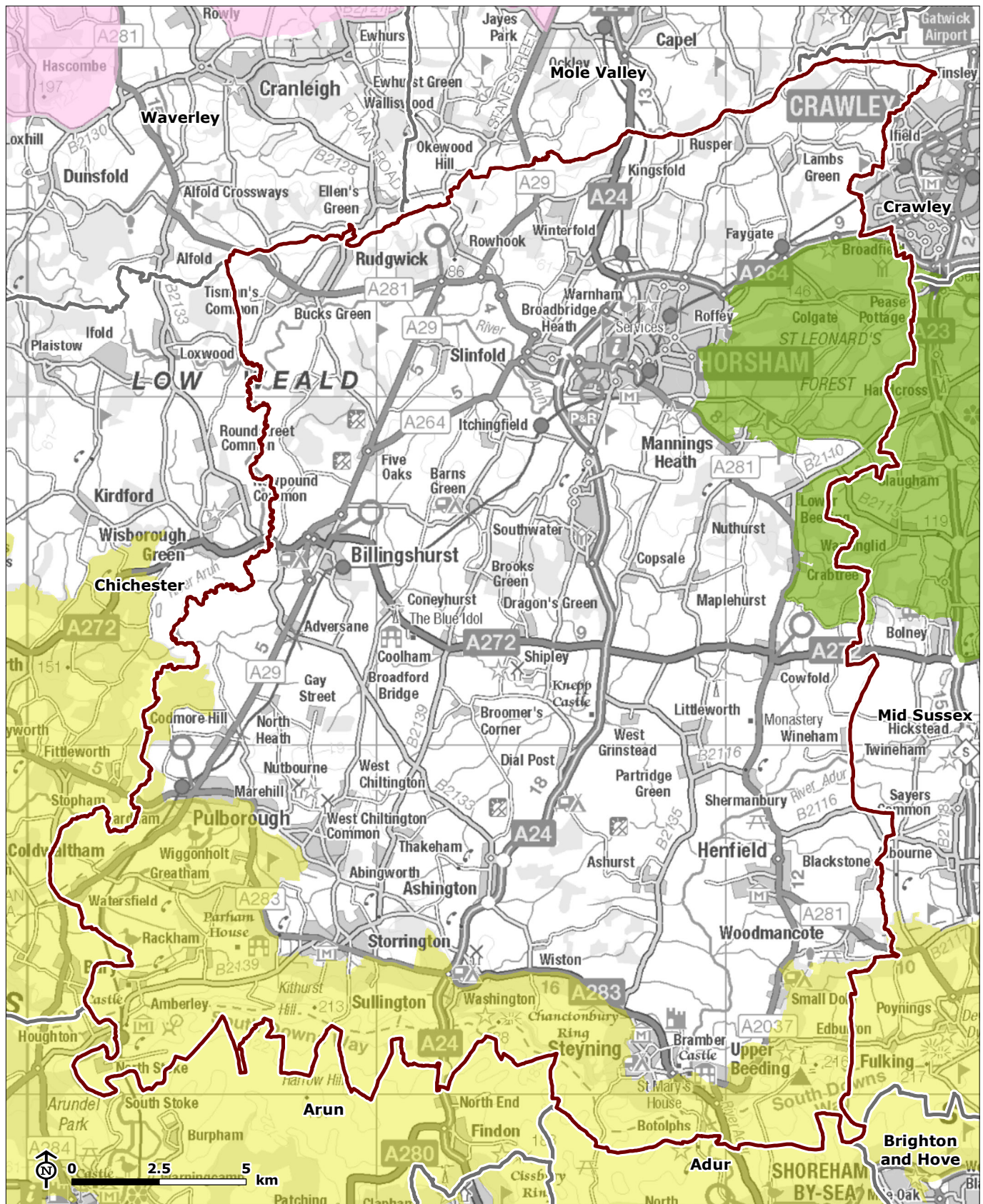
²⁵³ Horsham District Landscape Capacity Study (2014) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0009/31896/Landscape-Capacity-Study2014.pdf

²⁵⁴ 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>

²⁵⁵ 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

Table 10.1 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
<p>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.</p>	<p>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.</p>	<p>SA objective 7</p>



- Horsham
- Neighbouring authority
- High Weald Area of Outstanding Natural Beauty
- Surrey Hills Area of Outstanding Natural Beauty
- South Downs National Park

Source: Natural England

Map Scale @ A4: 1:155,000

**Horsham District Council
Sustainability Appraisal**

**Figure 10.1: Landscape
Designations in Horsham
District**



11 The SA Framework

The SA Framework

- 11.1 The development of a set of SA objectives (known as the SA Framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.
- 11.2 The proposed SA Framework for the Local Plan is presented in **Table 11.1**, and has been developed from the analysis of international, national and local policy objectives, the baseline information, and the sustainability issues identified for the District. It comprises a series of SA objectives, each accompanied by a set of questions that will be used to appraise the performance of the Local Plan Review against the SA objectives, including alternative overall spatial strategies for growth being considered by the Council for inclusion in the Local Plan.
- 11.3 The SA Framework is supported by a set of draft site assessment criteria and assumptions which will be used to establish the potential effects generated by development in site options and allocations identified for consideration by the District Council. The performance of sites against the site assessment criteria and assumptions will be used, alongside other technical assessment, to inform the Council's selection of individual site allocations. More detail on the criteria and assumptions used is provided in **Appendix 1**.
- 11.4 The SA objectives and accompanying questions set out in the SA Framework and the site assessment criteria and assumptions are subject to change following feedback collated during consultation on this SA Scoping Report with the three statutory consultation bodies (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations.

Table 11.1 SA Framework for the Horsham Local Plan Review

SA Objective	Appraisal questions	Relevant SEA Topics
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	<p>SA 1.1: Does the Plan provide for the local housing need of the District?</p> <p>SA 1.2: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period?</p> <p>SA 1.3: Does the Plan increase the supply of affordable homes in both urban and rural areas?</p> <p>SA 1.4: Does the Plan provide for the housing needs of an ageing population?</p> <p>SA 1.5: Does the plan meet Gypsy and Traveller accommodation needs?</p>	Population, Human Health and Material Assets
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	<p>SA 2.1: Does the Plan support the existing town and village centres?</p> <p>SA 2.2: Does the Plan provide for additional services and facilities centres that are sufficient to support new and growing communities?</p> <p>SA 2.3: Does the Plan provide for development within proximity to existing or new education facilities that are accessible for all?</p>	Population, Human Health and Material Assets
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	<p>SA 3.1: Does the Plan facilitate the integration of new neighbourhoods with existing neighbourhoods?</p> <p>SA 3.2: Does the Plan promote developments that benefit and are used by existing and new residents in the District, particularly for the District's most deprived areas?</p> <p>SA 3.3: Does the Plan meet the needs of specific groups in the District, including the needs of a growing and ageing population?</p> <p>SA 3.4: Does the Plan promote the vitality and viability of the District's town and village centres through social and cultural initiatives?</p>	Population, Human Health and Material Assets
SA 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced.	<p>SA 4.1: Does the Plan promote principles of good urban design to limit the potential for crime in the District?</p> <p>SA 4.2: Does the Plan contribute to a reduction in the fear of crime?</p> <p>SA 4.3: Does the Plan help to promote road safety in the District?</p>	Population and Human Health
SA 5: To improve public health and wellbeing and reduce health inequalities.	<p>SA 5.1: Does the Plan promote health and wellbeing and encourage healthy lifestyles by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure, and recreation and sports facilities?</p>	Population and Human Health

SA Objective	Appraisal questions	Relevant SEA Topics
	<p>SA 5.2 Does the Plan promote healthy lifestyle choices by encouraging and facilitating walking and cycling?</p> <p>SA 5.3 Does the Plan provide access to recreational opportunities in the countryside?</p> <p>SA 5.4 Does the Plan improve access to health care facilities?</p>	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	<p>SA 6.1: Does the Plan avoid adverse effects on internationally and nationally designated biodiversity and geodiversity assets within and outside the District?</p> <p>SA 6.2: Does the Plan avoid adverse effects on locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland?</p> <p>SA 6.3: Does the Plan seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?</p> <p>SA 6.4: Does the Plan provide and manage opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?</p>	Biodiversity, Flora, Fauna and Human Health
SA 7: To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.	<p>SA 7.1: Does the Plan protect and enhance the District's sensitive and special landscapes, including the setting of the High Weald AONB and the South Downs National Park?</p> <p>SA 7.2: Does the Plan conserve and enhance the character and distinctiveness of the District's non-designated landscapes and settlements?</p> <p>SA 7.3: Does the Plan protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves) and public realm?</p>	Landscape, Biodiversity, Flora, Fauna and Cultural Heritage
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	<p>SA 8.1: Does the Plan conserve and enhance the Borough's designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA 8.2: Does the Plan conserve and enhance the Borough's non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?</p> <p>SA 8.3: Does the Plan provide opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly heritage at risk?</p> <p>SA 8.4: Does the Plan promote access to, as well as enjoyment and understanding of, the local historic environment for the District's residents and visitors?</p>	Cultural Heritage, Architectural and Archaeological Heritage
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	<p>SA 9.1: Does the Plan maximise the provision of housing and employment development on previously developed land?</p> <p>SA 9.2: Does the Plan seek to deliver an appropriate density of housing development as to make efficient use of land?</p> <p>SA 9.3: Does the Plan ensure contaminated land is remediated where appropriate?</p> <p>SA 9.4: Does the Plan minimise the loss of high grade agricultural land to development?</p>	Soil and Material Assets

SA Objective	Appraisal questions	Relevant SEA Topics
SA 10: To conserve mineral resources in the District.	SA 10.1 Does the plan ensure that unnecessary or unjustified sterilisation of mineral resources is prevented?	Material Assets
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	SA 11.1: Does the Plan seek to improve the water quality of the District's rivers and inland water? SA 11.2: Does the Plan minimise inappropriate development in Source Protection Zones? SA 11.3: Does the Plan ensure there is sufficient waste water treatment capacity to accommodate the new development? SA 11.4: Does the Plan promote development which would avoid water pollution due to contaminated runoff from development? SA 11.5: Does the Plan ensure that there is sufficient water resource available to support new development? SA 11.6: Does the Plan support efficient use of water in new developments, including the recycling of water resources where appropriate?	Water, Biodiversity, Fauna and Flora
SA 12: To manage and reduce the risk of flooding.	SA 12.1: Does the Plan minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? SA12.2: Does the Plan promote the use of Natural Flood Management schemes, SuDS and flood resilient design?	Water, Material Assets, Climatic Factors and Human Health
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	SA 13.1: Does the Plan support access to public transport provision? SA 13 .2: Does the Plan maintain and enhance networks for active travel, including walking and cycling? SA 13.3: Does the Plan support development which is in close proximity to local centres, services and facilities, key employment areas and/or public transport nodes.	Air, Human health and Climatic factors
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	SA 14.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality? SA 14.2: Does the Plan promote more sustainable transport and reduce the need to travel? SA 14.3: Does the Plan contain measures which will help to reduce congestion? SA 14.4: Does the Plan minimise increases in traffic in Air Quality Management Areas? SA 14.5: Does the Plan facilitate the take up of low / zero emission vehicles?	Air and Human Health
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	SA 15.1: Does the Plan promote energy efficient design? SA 15.2: Does the Plan encourage the provision of energy from renewable sources where possible? SA 15.3: Does the Plan minimise greenhouse gas emissions from transport?	Climatic Factors and Air

SA Objective	Appraisal questions	Relevant SEA Topics
	SA 15.4: Does the Plan promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?	
SA 16: To facilitate a sustainable and growing economy.	<p>SA 16.1: Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District's economic and employment needs?</p> <p>SA 16.2: Does the Plan seek to promote business development and enhance productivity?</p> <p>SA 16.3: Does the Plan promote the image as an area for investment and support opportunities for the expansion and diversification of businesses?</p> <p>SA 16.4: Does the Plan provide for start-up businesses and flexible working practices?</p> <p>SA 16.5: Does the Plan support the prosperity and diversification of the District's rural economy?</p> <p>SA 16.6: Does the Plan support stronger links to the wider economy of the Gatwick Diamond and the aim of the Coast to Capital LEP?</p>	Population and Material Assets
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	<p>SA 17.1: Does the Plan provide for accessible employment opportunities?</p> <p>SA 17.2: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?</p>	Population and Material Assets

Use of the SA Framework

- 11.5 The SA will be undertaken in close collaboration with the Horsham District Council officers responsible for drafting the Local Plan Review in order to fully integrate the SA process with the production of the Local Plan Review.
- 11.6 The findings of the SA will be presented as a colour coded symbol showing a score for the option against each of the SA objectives along with a concise justification for the score given, where appropriate. It may be possible to group the appraisal of strategic and development management policies by theme.
- 11.7 The use of colour coding in the matrices will allow for likely significant effects (both positive and negative) to be easily identified, as shown in **Figure 11.1** below.

Figure 11.1 SA matrix guide

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/-	Mixed minor 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

- 11.8 The dividing line between sustainability scores is often quite small. Where significant effects are distinguished from more minor effects this is because, using the appraisal questions and criteria and applying professional judgement, the effect of the option on the SA objective will be of such magnitude that it will have a noticeable and measurable effect compared with other factors that may influence the achievement of that objective.
- 11.9 In determining the significance of the effects of the options for potential inclusion in the Local Plan Review it will be important to bear in mind the Local Plan's relationship with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Reasonable alternatives

- 11.10 The SA must appraise not only the preferred options for inclusion in the Local Plan Review but 'reasonable alternatives' to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, or are outside the Plan area are unlikely to be reasonable.
- 11.11 The objectives, policies and site allocations to be considered for inclusion within the Local Plan Review are in the process of being identified and reviewed. The Council's reasons for selecting the alternatives to be included in the Local Plan Review will be reported at a later stage in the SA process.

Assumptions

- 11.12 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the SA objectives in the SA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects are set out. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions, many of which are applied through the use of Geographical Information Systems (GIS) data, are presented in **Appendix 1**.

Health Impact Assessment

- 11.13 Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. As described in **Chapter 1**, the HIA will be incorporated into the SA. SA objective 5 directly addresses health issues, while achievement of SA objectives 2, 3 and 14 would also indirectly benefit people's health. The options and later policies for the Local Plan will all be assessed against these objectives as part of the SA. The SA report will make recommendations for how the health-related impacts of the Local Plan Review can be optimised as the options are developed into detailed policies.

Equalities Impact Assessment

- 11.14 There are three main duties set out in the Equality Act 2010, which public authorities including Horsham Council must meet in exercising their functions:
- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act.
 - 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.
- 11.15 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination on the basis of these characteristics. They are:
- Age.
 - Disability.
 - Gender reassignment.
 - Marriage and civil partnership.
 - Pregnancy and maternity.
 - Race.
 - Religion or belief.
 - Sex.
 - Sexual orientation.
- 11.16 The Local Plan Review will be assessed to consider the likely impacts of the draft policies on each of the nine protected characteristics from the Equality Act 2010 listed above. For each protected characteristic, consideration will be given to whether the Local Plan is compatible or incompatible with the three main duties set out in the Equality Act 2010. A colour coded scoring system (positive/negative/neutral) will be used to show the effects that the Local Plan policy and site options are likely to have on each protected characteristics.

12 Consultation and Next Steps

- 12.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) are being sought in relation to the scope and level of detail to be included in the SA Report.
- 12.2 This SA Scoping Report is being published for consultation for a five week period from 3rd September 2019.
- 12.3 As outlined in the introduction, the consultees are in particular requested to consider:
- Whether the scope of the SA is appropriate as set out considering the role of the Horsham Local Plan Review to help meet and manage Horsham's needs.
 - Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
 - Whether the baseline information provided is robust and comprehensive, and provides a suitable baseline for the SA of the Local Plan Review.
 - Whether there are any additional key sustainability issues relevant to the Local Plan Review that should be included.
 - Whether the SA Framework (**Chapter 10**) is appropriate and includes a suitable set of SA objectives and is supported by suitable site-based assumptions (**Appendix 1**) for assessing the effects of the options included within the Horsham Local Plan Review as well as reasonable alternatives.
- 12.4 Responses from consultees will be reviewed and appropriate amendments made to the detail contained in the Scoping Report, including the baseline, policy context and SA Framework where necessary. Any updates to this detail will be presented in the SA Report for Preferred Strategy document for the Local Plan Review.
- 12.5 As the Local Plan Review is drafted, it will be subject to SA using the SA Framework presented in **Chapter 11**. A full SA report (incorporating the later stages of the SA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan Review.

LUC

August 2019

Appendix 1

Criteria and assumptions to be applied in the SA of site options

Assumptions regarding distances

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

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

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

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

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

- 450m walking distance for primary schools on the basis that parents with young children are unlikely to want long distances with young children.
- 900m walking distance for secondary schools.
- 720m walking distance for town and local centres.
- 450m to a bus stop, as many people are unlikely to want to walk much further and then catch a bus to their destination.
- 1,800m walking distance to a train station.
- In terms of access to cycle route, a distance of 450m will be used in the appraisal on the assumption that links to cycle routes are likely to use road carriageways.

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

- 1,800m walking distance to employment areas.

Table A1.1: Criteria and assumptions to be applied during the SA of site options for the Horsham Local Plan Review

SA Objectives	Criteria and assumptions
<p>1. To provide affordable, sustainable and decent housing to meet local needs.</p>	<p>Residential site options</p> <p>All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Planning Practice Guidance²⁵⁶ states that affordable housing should only be sought for residential development 10 or more homes. It is expected that sites of this size or larger could potentially provide affordable homes and so will have significant positive effects. Therefore:</p> <ul style="list-style-type: none"> • Sites with capacity for more than 10 homes will have a significant positive (++) effect. • Sites with capacity for fewer than 10 homes will have a minor positive (+) effect. <p>Gypsy and Traveller site options</p> <p>All of the Gypsy and Traveller site options are expected to have positive effects on this objective, due to the nature of the proposed development which would help to meet local need. Therefore, all sites are considered to have a significant positive (++) effect.</p> <p>Employment site options</p> <p>The location of employment sites is not considered likely to affect this objective; therefore the score for all site options will be negligible (0).</p>
<p>2. To maintain and improve access to centres of services and facilities and education.</p>	<p>All site options</p> <p>Larger scale development could potentially incorporate the provision of new services. The location of all types of development sites could affect this objective by influencing people's ability to access existing services and facilities (both for local residents and employees during breaks and after work).</p> <p>The defined town centres followed by the village centres of the District are the areas in Horsham which provide access the high number of services and facilities. The location of proximity to these areas can therefore be used to establish the potential accessibility to a wider number of services and facilities in the District. Therefore:</p> <ul style="list-style-type: none"> • Sites that are within 720m of a defined town centre will have a significant positive (++) effect. • Sites that are within 720m of a defined village centre will have an uncertain minor positive (+?) effect. • Sites that are not located within 720m of a defined town centre or village centre will have an uncertain minor negative (-?) effect. <p>Residential and Gypsy and Traveller site options</p>

²⁵⁶ Ministry of Housing, Communities & Local Government (2019) Planning Practice Guidance Paragraph: 023 Reference ID: 23b-023-20190315

SA Objectives	Criteria and assumptions
	<p>For sites which support residential use it will be necessary to consider access to education facilities. It is recognised that educational facilities are often not located within the town and village centres and are instead provided to meet the needs of specific catchment areas. Sites which provide a good level of access to services and facilities at centre locations may not always be those which provide a good level of access to educational facilities. The effects of sites on the educational element of this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils, and there are no further education facilities in the District. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage. Therefore, for residential and Gypsy and Traveller sites, in addition to the assumptions set out to consider access to service and facilities centres:</p> <ul style="list-style-type: none"> • Sites that are within 1km of a secondary school and within 450m of a primary school will have an uncertain significant positive (++) effect. • Sites that are within 1km of a secondary school or within 450m of a primary school (but not both) will have an uncertain minor positive (+) effect. • Sites that more than 1km of a secondary school and 450m of a primary school will have an uncertain minor negative (-) effect. <p>This will mean some residential and Gypsy and Traveller sites may be recorded as having an overall mixed (++) or (+/-) effect.</p>
<p>3. To encourage social inclusion, strengthen community cohesion and a respect for diversity.</p>	<p>All types of site options</p> <p>The proximity of development to services and facilities may help to address issues of social inclusion. These issues (including access to facilities such as education and healthcare) are considered under SA objective 2 and SA objective 5 in the SA framework.</p> <p>Achieving local regeneration may help to promote a sense of ownership and community cohesion among residents. It is recognised that this will depend in part on the detailed proposals for sites and their design, which are not known at this stage. However, development which occurs on brownfield land is likely to help promote the achievement of regeneration in the District. Therefore:</p> <ul style="list-style-type: none"> • Sites that are on brownfield land will have a minor positive (+) effect. • Sites that are on greenfield land will have a negligible (0) effect. <p>The location of new developments will also affect social deprivation and economic inclusion by influencing how easily people are able to access job opportunities and access to decent housing in a given area. Areas which are identified as most deprived in the District are often also those which could benefit most from the achievement of regeneration. The delivery of housing or employment sites within a 40% most deprived area²⁵⁷ will therefore have a minor positive (+) effect.</p>

²⁵⁷ According to the Index of Multiple Deprivation 2015

SA Objectives	Criteria and assumptions
	<p>The town centre and village centre locations of Horsham help to support community networks in the District. Development which contains appropriate uses (such as retail and/or community uses) and is to occur within the defined town centres and village centres could help to maintain the vitality and viability of these locations. As such where site options to be delivered within the defined town centres and village centres would contain a use of this type, a significant positive (++) effect is expected.</p>
<p>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.</p>	<p>All types of site options</p> <p>The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of open space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site). Therefore, the effects of all of the site options on this SA objective will be negligible (0).</p>
<p>5. To improve public health and wellbeing and reduce health inequalities.</p>	<p>All types of site options</p> <p>Sites that are within walking distance (720m) of existing healthcare facilities (i.e. GP surgeries or hospitals) and areas/features which promote physical activities (open spaces, or sports facilities) among residents will ensure that residents have good access to healthcare services and are provided which opportunities for healthy lifestyle choices. This includes employment sites, which are will provide employees access to these types of features outside of working hours and during break times. Therefore:</p> <ul style="list-style-type: none"> • Sites that are within 720m of a healthcare facility and an area of open space/sports facility will have a significant positive (++) effect. • Sites that are within 720m of either healthcare facility or an area of open space/ sports facility (but not both) will have a minor positive (+) effect. • Sites that are not within 720m of either a healthcare facility or an area of open space/ sports facility will have a minor negative (-) effect. <p>If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such features a significant negative (--) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++)/(-) or (+/-) effect.</p> <p>If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded. If at any point information becomes available regarding the capacity of existing healthcare facilities, this will be taken into account in the SA as relevant.</p> <p>If development at a site is likely to incorporate new healthcare facilities, open space/sports facilities, it will be scored in</p>

SA Objectives	Criteria and assumptions
	accordance with the assumptions listed above.
<p>6. To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.</p>	<p>All types of site options</p> <p>Development sites that are within close proximity of an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The potential impacts on undesignated habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <ul style="list-style-type: none"> • Sites that are within Natural England's Impact Risk Zones (IRZs) of one or more internationally or nationally designated biodiversity or geodiversity sites may have an uncertain significant negative (--?) effect. • Sites that are within 400m of a locally biodiversity or geodiversity designated site or area of ancient woodland may have an uncertain minor negative (-?) effect. • Sites that not within of an IRZ of one or more internationally or nationally designated biodiversity or geodiversity sites, and are over 400m from a locally designated site could have a negligible (0?) effect.
<p>7. To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.</p>	<p>All types of site options</p> <p>The effects of new development on the character and quality of the landscape will depend in part on its design, which is not yet known; therefore all effects will be to some extent uncertain at this stage. The Horsham District Landscape Capacity Assessment is being updated as part of the evidence base for the Local Plan Review. It assesses the Local Landscape Areas (LLA) in the District in terms of their capacity to accommodate new development. Therefore, in addition to the above:</p> <ul style="list-style-type: none"> • Sites that are within an LLA that is assessed as having 'No/Low' or 'Low-Moderate' landscape capacity could have a significant negative effect (--?). • Sites that are within an LCT that is assessed as being of 'Moderate' or 'Moderate-High' landscape capacity could have a minor negative effect (-?). • Sites that are within an LCT that is assessed as being 'High' landscape capacity or are within the existing built up area boundary could have a negligible effect (0?). <p>This element of the appraisal will also reflect the type of development (i.e. residential or employment) which the Landscape Capacity Assessment considered for each area.</p>
<p>8. To conserve and/or enhance the qualities, fabric,</p>	<p>All types of site options</p> <p>The NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset</p>

SA Objectives	Criteria and assumptions
<p>setting and accessibility of the District's historic environment.</p>	<p><i>"great weight should be given to the asset's conservation ... irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".</i> However, development could also enhance the significance of the asset (provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset).</p> <p>In all cases, effects will be uncertain at this stage as the potential for negative or positive effects on historic and heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).</p> <p>As an indication of potential effects on historic and heritage assets from development of any of the site options, the following assumptions and evidence will be used:</p> <ul style="list-style-type: none"> Where a site option is more than 500m from the nearest designated heritage asset, a negligible effect is considered likely although this is uncertain (0?) as there is still some potential for impacts on non-designated heritage features and effects on designated heritage assets may extend beyond 500m in some cases. <p>Where a site option is within 500m of a designated heritage asset, professional judgement and evidence (such as Conservation Area Appraisals, heritage assessment work undertaken to support the Local Plan Review and input from conservation specialists) will be used to inform judgements. Where there are potential impacts on multiple heritage assets this will also be taken into account.</p> <ul style="list-style-type: none"> Sites which have potential for heritage assets to be enhanced and their significance to be better revealed could have a minor positive (+?) or significant positive effect (++?) on this objective. Sites which are unlikely to cause adverse impacts on heritage assets could have a negligible (0?) effect on this objective. Sites which have the potential to cause harm to heritage assets, but can be mitigated, could have a minor negative (-?) effect on this objective. Sites which have the potential to cause harm to heritage assets where it is unlikely that these can be adequately mitigated could have a significant negative (--?) effect on this objective.
<p>9. To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.</p>	<p>All types of site options</p> <p>The effects of new development on soils will depend on its location in relation to the areas of highest quality agricultural land in the District, and whether the land has previously been developed. Therefore:</p> <ul style="list-style-type: none"> Sites that are mainly or entirely on greenfield land which is classed as being of Grade 1, Grade 2 or Grade 3a agricultural quality would have a significant negative (--) effect. Sites that are mainly or entirely on greenfield land which is classed as being of Grade 3 agricultural quality (but where it is not known if it is Grade 3a or 3b land) could have a significant negative effect although this is uncertain (--?). Sites that are mainly or entirely on greenfield land that is classed as Grade 3b, Grade 4, Grade 5, non-agricultural or urban land would have a minor negative (-) effect.

SA Objectives	Criteria and assumptions
	<ul style="list-style-type: none"> Sites that are mainly or entirely on brownfield land would have a minor positive (+) effect. Sites that would result in the remediation of contaminated land would have a significant positive (++) effect.
<p>10. To conserve mineral resources in the District.</p>	<p>All types of site options</p> <p>The effects of new development on mineral resources will depend on its location in relation to areas which have been identified for their importance for mineral reserves in the District. The West Sussex Joint Minerals Local Plan (2018) identifies Mineral Safeguarding Areas (MSAs) and development within or in close proximity to these areas can result in sterilisation of mineral resources. Therefore:</p> <ul style="list-style-type: none"> Sites that are located directly within a MSA would have a significant negative effect on mineral resources although this is uncertain (--?) dependent upon whether extraction could be achieved prior to any development. Sites that are located within 250m of a MSA would have a minor negative effect on mineral resources although this is uncertain (-?) dependent upon whether extraction could be achieved prior to any development. Sites located more than 250m from a MSAs are expected to have a negligible (0) effect.
<p>11. To achieve sustainable water resource management and promote the quality of the District's waters.</p>	<p>All types of site options</p> <p>The effects of new development in terms of promoting more sustainable use of water resources will depend largely on people's behaviour as well as the design of new developments. However, where development takes place within Source Protection Zones (SPZs), there may be potential risks relating to contamination to result. Therefore:</p> <ul style="list-style-type: none"> Sites that are within a SPZ could have a minor negative (-) effect. Sites that are not within a SPZ could have a negligible (0) effect. <p>Any issues regarding supply of water resources, and waste water treatment capacity, are more appropriately appraised at the Local Plan scale, rather than through as assessment of each individual site.</p>
<p>12. To manage and reduce the risk of flooding.</p>	<p>All types of site options</p> <p>The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates SuDS, which cannot be assessed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. As such:</p> <ul style="list-style-type: none"> Sites that are entirely or mainly within flood zone 3a or flood zone 3b are likely to have a significant negative (--) effect. Sites that are entirely or mainly within flood zone 2 are likely to have a minor negative (-) effect. Sites that are entirely or mainly within flood zone 1 are likely to have a negligible (0) effect. <p>Furthermore:</p> <ul style="list-style-type: none"> Sites that are on greenfield land are expected to have a minor negative (-) effect.

SA Objectives	Criteria and assumptions
	<ul style="list-style-type: none"> Sites that are on brownfield land are expected to have a negligible (0) effect. <p>Adopting a precautionary approach the scores for this SA objective reflect the most adverse effect identified. For example a site which lies within flood zone 3a and brownfield land would score a significant negative (--) effect overall.</p>
<p>13. To reduce congestion and the need to travel by private vehicle in the District.</p>	<p>All types of site options</p> <p>The proximity of residential and employment sites to public transport links will affect the extent to which residents are able to make use of non car-based modes of transport to access services and facilities as well as job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of larger-scale housing developments or employment development but this cannot be assumed.</p> <p>It is assumed that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on factors such as the availability of cycle storage facilities at their end destination, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. Therefore:</p> <ul style="list-style-type: none"> Sites that are within 1.8km of a railway station are likely to have a significant positive (++) effect. Sites that are more than 1.8km from a railway station but within 450m of a bus stop and/or cycle route are likely to have a minor positive (+) effect. Sites that are more than 1.8km from a railway station and 450m from a bus stop and cycle route could have a minor negative (-) effect.
<p>14. To limit air pollution in the District and ensure lasting improvements in air quality.</p>	<p>All types of site options</p> <p>Development sites that are within, or directly connected via road, to one of the Air Quality Management Areas (AQMA) in the District, or in AQMA in surrounding Districts, could increase levels of air pollution in those areas as a result of increased vehicle traffic. Therefore:</p> <ul style="list-style-type: none"> Residential, employment and mixed use sites that are within or directly connected via road to an AQMA are likely to have a significant negative (--) effect. Gypsy and Traveller sites that are within or directly connected via road to an AQMA are likely to have a minor negative (-) effect (due to a lower number of vehicle movements likely to be associated with these sites). All sites that are not within or directly connected via road to an AQMA are likely to have a negligible (0) effect on air quality.
<p>15. To minimise the District's</p>	<p>All types of site options</p> <p>The effects of new development in terms of climate change and how development will respond to this issue will depend to some</p>

SA Objectives	Criteria and assumptions
<p>contribution to climate change and adapt to unavoidable climate change.</p>	<p>extent on its design, for example whether it incorporates renewable energy generation on site or includes SuDS.</p> <p>However, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, but this cannot be assumed.</p> <p>It is assumed that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on factors such as the availability of cycle storage facilities at their end destination, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. Therefore:</p> <ul style="list-style-type: none"> • Sites that are within 1.8km of a railway station are likely to have a significant positive (++) effect. • Sites that are more than 1.8km from a railway station but within 450m of a bus stop and/or cycle route are likely to have a minor positive (+) effect. • Sites that are more than 1.8km from a railway station and 450m from a bus stop and cycle route could have a minor negative (-) effect.
<p>16. To facilitate a sustainable and growing economy.</p>	<p>Employment site options</p> <p>All of the employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the creation of more new jobs and so would have significant positive effects. Therefore:</p> <ul style="list-style-type: none"> • Sites that are more than 5ha in size will have a significant positive (++) effect. • Sites that are smaller than 5ha in size will have a minor positive (+) effect. <p>Residential and Gypsy and Traveller site options</p> <p>The specific location of residential and Gypsy and Traveller sites within the District will not directly influence sustainable economic growth. Therefore a negligible (0) effect is expected for these types of site options.</p>
<p>17. To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in</p>	<p>Employment site options</p> <p>The provision of new employment sites within the District is likely to benefit the highest number of residents where are accessible by sustainable transport links. Therefore:</p> <ul style="list-style-type: none"> • Sites that are within 1.8km of a train station or likely to have a significant positive (++) effect. • Sites that are within 450m of a bus stop and/or cycle path are likely to have a minor positive (+) effect.

SA Objectives	Criteria and assumptions
the District.	<p>Sites that are not within 1.8km of a train station or within 450m of a bus stop and cycle path are likely to have a minor negative (-) effect.</p> <p>Residential and Gypsy and Traveller site options</p> <p>The location of residential and Gypsy and Traveller sites will influence the achievement of this objective by determining how easily residents would be able to access job opportunities at existing employment sites.</p> <p>The settlement hierarchy set out in the HDFP identified that the Main Town of Horsham provides access to a large range of employment opportunities. The remaining settlements in the District have been identified through the settlement hierarchy as providing local or more limited employment provision. The proximity of site options to key employment areas also serves as an indicator of the level of employment opportunities which are likely to be accessible. Therefore:</p> <ul style="list-style-type: none"> • Sites that are within 1.8km of a key employment area and that are within 720m of Horsham town would have a significant positive (++) effect. • Sites that are within 1.8km of a key employment area or that are within 720m of Horsham town (but not both) would have a minor positive (+) effect. • Sites that are within 1.8km to 2.7km of a key employment area but are not within 720m of Horsham town would have a minor negative (-) effect. • Sites that are more than 2.7km from a key employment area and are not within 720m of Horsham town would have a significant negative (--) effect. <p>In addition, if a site option would result in the loss of an existing employment site, a negative effect would occur in relation to the protection of existing employment sites.</p> <p>Therefore (which could result in mixed effects overall):</p> <ul style="list-style-type: none"> • Sites that are currently in employment use would have a significant negative (--) effect.