



**Horsham
District
Council**

**STRATEGIC ENVIRONMENTAL ASSESSMENT &
SUSTAINABILITY APPRAISAL
NON-TECHNICAL SUMMARY
HORSHAM DISTRICT LOCAL PLAN**

December 2023

1.0 Horsham Local Plan and Sustainability Appraisal and Strategic Environmental Assessment.

- 1.1 The current Horsham District Local Plan (HDPF) was adopted in 2015. A new Local Plan is being developed which will run from 2023 to 2040. The Horsham District Local Plan will determine the type and location of future development in the district. The document which has been prepared is known as the Horsham District Local Plan 2023-2040 Regulation 19. The structure of the new plan is set out below. It sets out the chapter titles followed by the key policies within that chapter.

Structure of the Horsham District Local Plan 2023-2040 Regulation 19

Chapter 1: Introduction

Chapter 2: Planning Context

Chapter 3: Spatial Vision & Objectives

Chapter 4: Policies for Growth & Change (Sustainable Development, Development Hierarchy, Settlement Expansion, Horsham Town, Broadbridge Heath Quadrant)

Chapter 5: Climate Change & Water (Climate Change, Appropriate Energy Use, Sustainable Design & Construction, Water Neutrality, Flooding)

Chapter 6: Conserving & Enhancing the Natural Environment (Environmental Protection, Air Quality, The Natural Environment & Landscape Character, Countryside Protection, Settlement Coalescence, Protected Landscapes, Green Infrastructure & Biodiversity, Local Green Space)

Chapter 7: Development Quality, Design & Heritage (Development Quality, Development Principles, Heritage Assets & Managing Change within the Historic Environment, Shop Fronts & Advertising)

Chapter 8: Infrastructure, Transport & Healthy Communities (infrastructure provision, sustainable transport, parking, Gatwick Airport safeguarding, inclusive communities, health & wellbeing, community facilities, leisure & recreation)

Chapter 9: Economic Development (New Employment, Enhancing Existing Employment, Rural Economic Development, Conversion of Agricultural & Rural Buildings to Commercial, Community and Residential Uses, Equestrian Development, Tourism Facilities & Visitor Accommodation, Town Centre Hierarchy & Sequential Approach, Town Centre Uses)

Chapter 10: Housing (inc Allocations) (Housing Provision, Meeting Local Housing Needs, Affordable Housing, Improving Housing Standards, Rural Exception Homes, Retirement Housing & Specialist Care, Gypsies & Travellers, Rural Workers Accommodation, Replacement Dwellings & House Extensions in the Countryside, Ancillary Accommodation)

Housing Allocations

Strategic Site Development Principles; Strategic Site Allocations (Land West of Ifield, Land North West of Southwater, Land East of Billingshurst); Settlement Site Allocations (Ashington, Barns Green, Broadbridge Heath,

Cowfold, Henfield, Horsham, Lower Beeding, Partridge Green, Pulborough, Rudgwick & Bucks Green, Rusper, Small Dole, Steyning, Storrington & Sullington, Thakeham, Warnham, West Chiltington & West Chiltington Common)

- 1.2 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to a Sustainability Appraisal (SA). A SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental, and economic effects of the policies and proposals in a plan from the outset of its development.
- 1.3 Strategic environmental assessment (SEA) is also a statutory assessment process, by the Environmental Assessment of Plans and Programmes Regulations 2004. This process assesses plans to see what impacts they may have on the environment and ensure that any adverse impacts are identified avoided or reduced (mitigated). Sustainability Appraisal and Strategic Environmental Assessments are very similar and in practice have been merged. It is referred to in this document as an SA/SEA
- 1.4 The preparation of the SA/SEA for the Horsham District Local Plan began in 2019. The SA/SEA process has involved the steps shown in Table 1, which are interlinked with the development of the plan.

Table 1: Steps in the preparation of the Horsham District Local Plan and SA/SEA processes

Date	Key Action
2018	Council holds a 'call for sites' exercise to understand what land may be available for development in the District. Council holds an Issues and Option consultation
Spring – Autumn 2019	A SA/SEA Scoping Report is prepared by LUC on behalf of Horsham District Council (HDC). This document identifies other relevant other plans and policies to the emerging Local Plan, the existing and likely future baseline situation in the District according to key environmental issues and a SA/SEA framework which will be used to assess the future plan alternatives, policies and sites as they are progressed. Consultation on the SA 'scoping report' held September to October 2019.
Spring – Autumn 2019	Initial identification and appraisal of the alternatives (amount of growth, broad spatial strategy) of policies and sites of the Regulation 18 draft Horsham Local Plan as part of the preparation of an initial Sustainability Appraisal and Strategic Environmental Assessment.
Feb – March 2020	Council consults on the Regulation 18 draft Local Plan and the Interim Sustainability Appraisal and Strategic Environmental Assessment documentation.
2020-2021	Council develops on Regulation 19 plan, taking into account of consultation feedback, evidence base and revisions to the National Planning Policy Guidance.

Date	Key Action
	Preparation of Sustainability Appraisal of the 2021 draft version of the Horsham District Local Plan Regulation 19 documentation (which was considered by the Council's Cabinet in July 2021 but did not progress to Full Council)
Sep 2021	Natural England requires water neutrality for new development in Southern Water's Sussex North Water Resource Zone
Sep 2021 – December 2023	Local authorities in the Sussex North Water Resource Zone work together on a water neutrality approach for their Local Plans. Impacts of Water Neutrality reflected in revisions to the Local Plan and the accompanying Sustainability Appraisal.

2.0 Scoping: Sustainability Context for Development in Horsham District

Plans, Strategies and Programmes affecting the preparation of the Local Plan

- 2.1 The initial stage of the Sustainability Appraisal and Strategic Environmental Assessment was to understand the key **legislation and policies** affecting the preparation of the Horsham District Local Plan. The most significant is the National Planning Policy Framework (2021), which requires Local Plans to promote sustainable development, and to follow a standard method to determine the need for new housing.
- 2.2 Neighbouring districts and boroughs around Horsham District are developing their own Local Plans. As part of the legal 'Duty to Co-operate' Horsham some of these have asked their neighbouring or nearby authorities (including Horsham District) to provide some of the housing that it cannot provide within its boundaries. Crawley Borough Council is one such authority to make this request, and historically Horsham District has been able to accommodate some of Crawley's unmet need. This has therefore been a key consideration in the preparation of the Council's local plan.
- 2.3 The Council has also considered the content of Neighbourhood Plans which have been prepared or are in the process of preparation in Horsham District.

Sustainability Issues affecting Horsham District

- 2.4 Baseline data about the environment, economy and social issues have been collected for the District. These baseline data has been used to identify the key social, environmental and economic issues affecting the District. These are summarised in the box below.

- The entire District is in a zone of **high-water stress**. Water abstraction from the ground has been identified as having a harmful effect on the Arun Valley. This site is of international importance for the wildlife it supports. In order to protect these wildlife sites, the Local Plan must be 'water neutral' and new development cannot increase the demand for water above existing rates of water abstraction. This is a significant constraint on the plan.
- Horsham District has an **ageing population**. This means new development will need to be suitable for elderly resident and will need to ensure specialist services and facilities are provided to cope with the needs of an older population.
- Horsham District has **high house prices** in Horsham. There is a high need for affordable housing of different types and sizes.
- A **deficiency in recreational/open space** provision has been identified in a number of specific areas including provision for children and young

people's play whereby provision is only around 13% of what it should be. Similarly for allotments, there is a shortfall of around 11 hectares according to national standards. This means the local plan needs to make sure facilities are provided to meet the needs of new development and ensure the situation does not get worse.

- Horsham has a significant **net outflow of commuters**, due to its rural nature and proximity to employment centres outside the District (e.g. Crawley, London). New development needs to provide employment land to help provide choices as to where people work.
- New retail habits such as **E-retailing and online services** changing the way we shop which may affect the vitality of Horsham town centre, and town and village centres. The local plan needs to consider how to ensure town centres remain vibrant places to visit.
- The District's residents have high levels of car ownership and many **drive to work**. Parts of the highway network in the District experience **high levels of congestion and delays**. Rail capacity is also currently stretched, and capacity pressures on London services are expected to increase.
- Some areas have only **limited bus services** and other public transport links.
- **Air Quality Management Areas (AQMAs)** have been designated at Cowfold, Storrington, both of which are in Horsham District. There are also AQMAs in Hassocks, (Mid Sussex District) and near the north-eastern edge of the District at Horley and Crawley.
- Some of the District's water bodies have '**bad**' or '**poor**' **ecological status**. Some areas of the District are covered by a Source Protection Zone.
- While average energy consumption of Horsham residents has fallen in recent years, the District still has the second **highest per-capita CO2 emissions** in the County.
- The main source of **flooding** in the District is from rivers (fluvial). Climate change is expected to result in more extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought).

Sustainability Appraisal Framework

- 2.5 In order to test how the Local Plan might impact on the Sustainability issues outlined above, a **'Sustainability Appraisal Framework'** was developed. This Framework was used to structure the appraisal of the plan's emerging alternatives, policies and sites. This is shown at Table 2.0.

Table 2.0 Sustainability Appraisal Framework

SA Objective
SA 1: To provide affordable, sustainable and decent housing to meet local needs.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.
SA 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced.
SA 5: To improve public health and wellbeing and reduce health inequalities.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.
SA 7: To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.
SA 10: To conserve natural resources, including mineral resources in the District.
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.
SA 12: To manage and reduce the risk of flooding.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.

SA Objective
SA 16: To facilitate a sustainable and growing economy.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.

2.6 For each option, alternative or policy it was considered what impact would arise on the objectives above. The outcomes were scored using the table below.

Key to symbols and colour coding used in the SA framework

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

3.0 The ‘do nothing’ approach – what would happen without a Local Plan Review

3.1 It was considered what would happen to the sustainability appraisal objectives if no local plan was prepared. In summary it was found that a number of sustainability issues in the District would be harmed without an updated Local Plan. For example, it is unlikely that sufficient housing would be provided, including those in need of affordable housing, older people and the Gypsy and Traveller community. It is also less likely that sufficient infrastructure, services and facilities would be provided in appropriate locations.

3.2 Without an up-to-date Local Plan, there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas of the District where deficiencies have been identified may remain limited. Similarly, without the Local Plan Review, development may be located in less sustainable locations that increase reliance on car use. This is likely to increase air pollution. Development is also likely to be more speculative in nature and has the potential to come forward in areas that are more sensitive in terms of their impact on heritage assets, landscape value or the erosion of habitats.

3.3 Without a revised Local Plan, development could only come forward where it can demonstrate that it will be water neutral within its own right (that is, it should fully offset its water use). This could mean a drastically reduced amount of development overall, and the forms of offsetting such as boreholes may have longer term environmental

consequences on other aquifers. The Local Plan Review incorporates policies to ensure that development coming forward must demonstrate that they will have no adverse impact on environmentally designated sites due to increased water abstraction and will provide the basis for pooled offsetting of water use through the Sussex North Offsetting Water Scheme (SNOWs).

- 3.4 It is uncertain how the job market will change without the implementation of the Local Plan. The Local Plan offers the opportunity to create and safeguard jobs through the allocation and promotion of new employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.

4.0 Local Plan Preparation 2018-2021: Reasonable Alternatives

Level of Development

- 4.1 The Council started the preparation of its new Local Plan by considering five quantum options for levels of growth that could come forward in the Plan:

1. **Quantum Option 1:** Lower Growth: 1,000 houses per year to meet the government's standard methodology target, plus 35.3 hectares of employment land, as required by the council's economic growth assessment. The National Planning Policy Framework states that development lower than the standard housing methodology is only possible in exceptional local circumstances. This was not the case in the period between 2018 -2021.
2. **Quantum Option 2:** Medium Growth: 1,200 houses per year, to meet the government's standard methodology target and also provide for some of the housing need of nearby districts, plus 43.4 hectares of employment land.
3. **Quantum Option 3:** Higher Growth: 1,400 houses per year, to meet the government's standard methodology target and also provide for some of the housing need of nearby districts, plus 50.7 hectares of employment land.
4. **Quantum Option 4:** near Maximum Growth: 1,600 houses per year, to meet the government's standard methodology target and to help meet the unmet needs of a number of neighbouring authorities under the Duty to Cooperate (DtC).
5. **Quantum Option 5:** Maximum Growth: 1,800 houses per year, to meet the government's standard methodology target and an even greater contribution to the unmet needs of neighbouring authorities under the DtC.

- 4.2 In summary, the appraisal found that higher growth was better socially and economically: for housing need, economic growth and job creation. Higher growth could increase pressure on existing services such as schools and healthcare but could also lead to new services being provided. Higher growth had more negative impacts

on biodiversity, landscape, heritage, water, flooding, soils/minerals, air quality and climate. In the end, a housing target of 1,100 homes per year was identified as the preferred alternative, balancing a positive outcome for housing the economy with the need to protect and enhance the environment.

Location of development – overarching strategy

4.3 The Council then considered **six broad spatial options** for future development:

1. **Existing settlement hierarchy strategy:** Focus growth in and around the key settlement of Horsham and allow for growth in the rest of the District according to the size of the town or village.
2. **Proportionate growth strategy:** Growth is apportioned to all towns and villages according to their current population.
3. **New Garden Towns:** 90% of growth at new garden towns, and 10% at small sites.
4. **New Urban Extensions:** Like Option 3, but with most of the growth at new urban extensions instead of at new garden towns.
5. **Employment Strategy:** Focus growth in the district where much employment growth is expected (some of this could be close to the District boundary to respond to the areas which are of economic importance outside of Horsham).
6. **Sustainable transport strategy:** Growth focused at towns and villages with existing rail links, high frequency bus services, and to a lesser extent good access to A roads.

4.4 The appraisal of the broad spatial options found that Options 1 and 4 performed better than the other options. Both options would provide new growth in the main settlement of Horsham Town which is the main economic centre and service provider in the District. With Option 1 providing a higher number of residents access to the largest settlements in the District, supporting the widest range of services and facilities and employment opportunities. Option 1 was therefore found to offer more potential for avoiding adverse impacts in terms of social integration and landscape impact.

4.5 The SA acknowledged that some development may still need to be accommodated at a new settlement, given how much growth which is required over the plan period. A new settlement could help to provide new services and facilities and new high-quality employment land.

4.6 In order to provide the Council with more detailed analysis, further SA work was carried out to consider different combinations of the spatial strategy options and different quanta of development. This was presented in the form of growth scenarios . It was evident from this analysis that a combination of Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) would form a sensible basis for preferred site selection. However, given the scale of development required to meet NPPF objectives, it was noted that the emerging strategy should also to some degree reflect the principles in Option 3 (New garden towns) combined with Option 6 (Sustainable transport strategy). The appraisal concluded that a mix of options in line with the existing development hierarchy may be the best option to deliver development.

Large Site alternatives

4.7 The Council initially considered ten **large site** options for new development. These were strategic sites that could make a significant contribution to meeting the future housing needs for the District. Two additional large site options were then also added as they were recognised as having strategic implications. The 'Ashington cluster' was added in response to the councils site assessment work, as it was being promoted as one site by a consortium of developers. The Horsham Golf & Fitness Club was added into the appraisal as it was being promoted for a significant number of homes and as such also had strategic implications.

4.8 In summary 12 large site options were promoted to the Council as being able to deliver a significant level of housing development. The sites were:

1. **Site SA101: Land West of Ifield (urban extension)**
3,250 dwellings and approximately 9,000m² B2/B8 and former B1 uses (c.2.0ha) within the plan period (and a total of 10,000 dwellings in the longer term).
2. **Site SA118: Land East of Billingshurst (urban extension)**
650 dwellings and 2,200m² B2/B8 and former B1 uses (0.5ha) within the plan period.
3. **Site SA119: North West of Southwater (urban extension)**
1,200 dwellings and 18,000m² B2/B8 and former B1 uses (c.4.0ha) within the plan period.
4. **SA291: West of Kilnwood Vale extension (urban extension)**
350 dwellings as an extension to the new Kilnwood Vale neighbourhood currently under construction, with no substantial employment land provision within the plan period
5. **Site SA394: Rookwood (urban extension)**
725 dwellings and 3,000m² E uses (start-up or flexible desk space facilities) (c.0.4ha) within the plan period. During the course of Local Plan preparation this site has been withdrawn and is no longer available for allocation for development in the Local Plan.
6. **Site SA414: Land North East of Henfield (Mayfield) (new settlement)**
2,000 dwellings and 7,000 new jobs through the provision of new employment floorspace within the plan period (and a total of 7,000 homes in the longer term). During the course of Local Plan preparation this site has been withdrawn and is no longer available for allocation for development in the Local Plan
7. **Site SA459/SA674/SA846: Land East of Kingsfold (urban extension/satellite settlement)**
1,000 dwellings and 75,000m² of employment space within the plan period (and a total of 1,300 dwellings in the longer term).
8. **Site SA597: Adversane / Land at Steepwood Farm (new settlement)**

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

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

2,100 dwellings, 30,000m² B2/B8 and former B1 uses (of which 21,200m² B2/B8) (c.6.5ha) within the plan period (the proposals at Buck Barn are for a settlement of around 3,000 homes in the longer term).

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

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

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

500-550 dwellings and a range of sports facilities.

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

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

- 4.9 The appraisal concluded that all of the sites would provide homes and support economic growth. More mixed effects were expected in terms of health/wellbeing and access to services, depending on how near the sites were to existing settlements. Many sites would result in loss of large areas of greenfield land, high value agricultural soils and mineral resources, and would affect the landscape, heritage and biodiversity of the area. The urban extension sites generally performed better than new town sites because they were closer to existing jobs, services and facilities. Delivering new large-scale development at urban extensions could also provide new jobs, services and facilities where existing residents could get to them easily: this would then reduce the need for residents to travel longer distances.
- 4.10 In 2021, the best performing urban extension sites available to the Council **at that time** were Rookwood, West of Ifield and West of Southwater. East of Billingshurst, West of Billingshurst, followed by Horsham Golf and Fitness Club performed less favourably. Of the new town options, Adversane and Buck Barn performed about the same, and better than land North-east of Henfield (Mayfield). As well as the sustainability of each separate site, the Council also took account of the overall pattern of development across the District.
- 4.11 The Council also identified some **small site** options, mostly for housing and some for employment or Gypsy and Traveller sites. The appraisal of the small sites showed that many of the sites in and around Horsham Town and the smaller towns and larger villages perform well in terms of their access to services and facilities, and for health/wellbeing. This was particularly the case for sites at Billingshurst, Henfield, Pulborough and Codmore Hill, Steyning and Storrington. Sites close to a railway station - at Billingshurst, Christ's Hospital, Horsham Town, Pulborough and Codmore Hill and Warnham – were also shown to perform well in terms of reduced reliance on the car and impact on climate change.

- 4.12 Many existing developments on the edges of settlements including Ashington, Barns Green, Billingshurst, Christ's Hospital, Cowfold, Henfield, Lower Beeding, Pulborough and Codmore Hill, Rudgwick and Bucks Green, Rusper, Southwater, Storrington, Thakeham and Warham were identified as having no/low or low-moderate landscape capacity for new development. Sites at these settlements perform particularly poorly in relation to landscape (SA objective 7). In most instances, the differences between the small sites were quite small in overall sustainability terms.

Spatially specific growth scenarios

- 4.13 Drawing on the appraisals of the five quanta of growth options, the six overall spatial strategy options, and the large and small-scale site options, the Council identified nine spatially specific growth scenarios at the Regulation 18 stage that could be taken forward in the Local Plan Review. These were then also subject to Sustainability Appraisal and Strategic Environmental Assessment.
- 4.14 The fourteen alternative growth scenario options related to either lower, medium or higher growth scenarios. They included different combinations of large and small site options to ensure that all reasonable alternative options relating to the distribution of growth in the District had been appraised.

Preferred Strategy taken forward in the Regulation 19 Local Plan (July 2021)

- 4.15 The appraisal of the nine spatially specific growth scenarios concluded that the Preferred Strategy would be for 10,445 new homes to be delivered in the District over the Local Plan Review period. This stage of work was significant in helping the Council to recommend a growth strategy which was considered at a Cabinet meeting in July 2021. This strategy was found to which both met the Local Plan objectives whilst performing well against SA objectives, in the context of meeting development needs in full and contributing to meeting the unmet development needs from other local authority areas.

5.0 Local Plan Preparation July 2021- December 2023

5.1 In July 2021, before the draft Regulation 19 could be considered by Council the government published a revised version of the National Planning Policy Framework (NPPF). This set out a requirement for the Local Plan to consider development in the context of a 30 year vision. The preparation of the plan was therefore delayed to take this issue into account. The preparation of the local plan was then further delayed by the requirement for the Local Plan to demonstrate Water Neutrality.

Water Neutrality and the Local Plan

5.2 In September 2021, Natural England issued a Position Statement stating that evidence indicates that water abstraction to supply houses and businesses in North West Sussex (which includes all of Horsham District) is causing harm to internationally important wildlife sites in the Arun Valley, near Pulborough. In order to prevent additional harm to this habitat, any new development in the District would have to be water neutral – in other words not increase the demand for water above existing rates of abstraction.

5.3 Water neutrality can be achieved firstly by designing development to ensure that it is as water efficient as possible – for example through the use of low flow appliances (such as showers) rainwater collection and reuse of greywater (water already used for showering etc.). New development will still however require water and the additional demand will be offset by reducing demand elsewhere, for example by retrofitting existing properties so that they are also more water efficient. Southern Water is already planning additional water reduction measures through reduced water demand and fewer leaks.

5.4 Since Natural England issued their position statement, the Local Authorities in North West Sussex affected by the requirement for Water Neutrality (Crawley Borough, Horsham District, Chichester District, West Sussex County Council and the South Downs National Park) have worked together to ensure that, together, their future developments are water neutral. A Water Neutrality Assessment study looked at different water efficiency targets that could be required of new development in local plan policies, from the current national standard (125 litres per person per day, lpd) to an ambitious 62 lpd. The lower the water use by each new development, the less balancing 'offsets' are needed, and the more new houses can be built. The two reasonable alternatives were:

- 85 lpd to 2038/39, with flow restrictors in existing properties, rainwater collection on some big commercial buildings and water efficiency in schools as offsets. This was considered a reasonable maximum of water efficiency.
- 110 lpd to 2038/39, with the same offsets as for 85 lpd plus more expensive or less certain extra offsets. This is the current level of water efficiency applied in Horsham District as the District is already identified as being under water stress.

- 5.5 All of the authorities affected by water neutrality concluded that a water efficiency level of 85 lpd to be the most sustainable option. Although both options would achieve water neutrality and help to protect the area's biodiversity, a water efficiency level of 85 lpd for residential developments was considered the more socially beneficial alternative as it would allow for a greater number of homes to be built. It was also assessed as being economically viable for developers.
- 5.6 A consequence of the need for all development to demonstrate water neutrality has been a significant drop in the number of applications granted planning permission since September 2021 as proposals have been unable to demonstrate that they are water neutral. In addition there are a number of uncertainties all of which need to be resolved to enable plan led water neutral development to come forward. As a consequence the ability of the District to deliver significant levels of growth over the plan period has been affected.

Updated Sustainability Appraisal of the Regulation 19 Local Plan Site Options and Policies

Growth Alternatives

- 5.7 In response to the issue of water neutrality, the council took the opportunity to re-examine where growth should be distributed. Four *lower growth alternatives* were therefore considered:
1. **Urban extension:** West of Ifield, East Billingshurst, North West of Southwater, North Horsham, Kilnwood Vale, Ashington Cluster plus around 550 homes on smaller sites
 2. **New settlements:** North East of Henfield (Mayfield), Adversane, Buck Barn plus around 2,050 homes on smaller sites
 3. **Good access to sustainable transport:** West of Ifield, East Billingshurst, North West of Southwater, North Horsham plus around 2,500 homes on smaller sites
 4. **New settlements and small sites only:** North East of Henfield, Adversane, Buck Barn plus around 3,700 homes on smaller sites
- 5.8 The appraisal found that Options 1 and 3 - urban extensions and access to transport – (together with some more limited growth of smaller villages and towns), were more sustainable than the provision of a new settlements and so this locational strategy was pursued into the Horsham District Local Plan Regulation 19 Documentation.

Strategic Site Allocations

- 5.9 All of the Regulation 19 plan policies and site options were reappraised using the Sustainability Appraisal Framework. A summary of the key changes to the Assessment is shown in Appendix 1, with key headlines summarised in the paragraphs overleaf.

- 5.10 In July 2021, the proposed allocation for Land North West of Southwater was for 1,200 homes. The proposals for this site have now been revised so that only 1,000 homes are proposed. The reappraisal of the alternative options found that the impacts on **SA2: Access to Services and Facilities** and **13: Transport** to be less favourable due to the proposed housing number decreasing from 1,200 to 1,000 homes. The reduction in homes was also found to have a lower adverse impact on the landscape. The location for the new secondary school in line with the Neighbourhood Plan allocation was found to maintain and help retain on community cohesion and potentially greater reliance on private car use.
- 5.11 The reappraisal of Horsham Golf and Fitness Club found increased adverse impacts on **SA13 Transport, SA14 Air Quality** and **SA17: Access to Employment** due to the proposed increased level of development not being located close to any significant community facilities, and therefore again potentially increasing reliance on private car use.
- 5.12 The reappraisal of other sites did not identify other significant changes to the site earlier assessment outcomes in 2021. However, as a result of the requirements for water neutrality, and the impact on housing delivery it was concluded that the Local Plan strategy should be for **new urban extensions and some growth in smaller villages and towns**. Of the four sites within the 2021 version of the Horsham District Local Plan Regulation 19, Land at Buck Barn performed the least favourably when considered against the Local Plan objectives and as such it was removed as a proposed allocation.

Small Site Allocations

- 5.13 A re-appraisal of each of the small sites considered for inclusion in the draft Regulation 19 Local Plan was undertaken. This appraisal found that a range of both positive and negative effects could arise as a result of their development. Sites at the Main Town (Horsham) or a Small Town or Larger Village in the District performed favourably in relation to both access to services and facilities and health and wellbeing. It was noted that in smaller settlements the range of accessible services and facilities was more limited and so the effect was lesser. Specific characteristics (e.g. presence of a rail station, functional links to an Air Quality Management Area, and particular landscape sensitivities) were noted to have positive or negative effects on relevant objectives.
- 5.14 The reappraisal of small sites included the appraisal of two brand new sites at Old School Site, Barns Green and Land at Cyder Farm, Lower Beeding which are neighbourhood plan sites, both of which have gone through the Neighbourhood Plan examination process and been found to meet the basic conditions. Both sites were found to score positively against **SA Objective 1: Housing** and have a neutral effect against **Objectives 2, 13, and 15** as they are both located away from any main settlement boundaries and will require public transport. Minor positive effects were recorded against **SA Objectives 3 and 9** as they are both located on brownfield land, and **SA Objective 5:** as they are both close to open space which will help encourage

more active lifestyles. Negligible impacts are expected for **SA Objectives 6, 7, 8, 12, 16 and 17** as they are not located near any biodiversity or geodiversity sites, areas of ancient woodland, local landscape areas or heritage assets, and they are not likely to lead to an increase in impermeable surfaces to lead to employment provision. Both sites are located in the Water Resource Zone and so are expected to have a minor negative impact on **SA Objective 11** without appropriate mitigation.

- 5.15 Other significant changes included more favourable scores being recorded against **SA Objective 8: Historic Environment** for sites SA510 Land at Muntham Drive and SA794 Land north of the Guildford Road, Rusper. More favourable scores were also recorded against **SA Objective 7: Landscape** for site SA384 Land at Rock Road, Storrington and similarly against **SA objectives SA6: Biodiversity** and **SA8: Historic environment** for site SA361/SA792 Melton Drive, Storrington.
- 5.16 A small number of sites were removed from consideration as allocations since The draft LUC Regulation 19 SA Report in July 2021, primarily because they have since been given planning permission.

Policy Assessment

- 5.17 All of the Regulation 19 plan policies and site options were reappraised using the Sustainability Appraisal Framework. This took account of the changes to the overall level and distribution of growth, changes to national planning policy and the new water neutrality policy. A summary table of the effects of each policy is included in this document at Appendix 2.
- 5.18 Overall, the appraisal concluded that the majority of policies included in the Regulation 19 Local Plan would have a positive impact on at least one of the SA objectives, with negative impacts identified from policies relating to new employment, housing development, rural economic development, Gypsy and Traveller sites and Gatwick Airport safeguarding. The environmental policies in the plan seek to ensure that the potential for harm is prevented or reduced.

6.0 Cumulative Impacts of Policies in the Local Plan on Sustainability Objectives

- 6.1 The SA/SEA process also considered the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects of the Local Plan including taking account of Local Plan impacts from neighbouring Districts and Boroughs.
- 6.2 A review of the cumulative impacts of development with other plans found there may be potential to increase local congestion and air pollution around the boundaries of Crawley BC, Arun DC, Adur DC and Waverley DC and along the A283 in the South Downs National Park. This is being addressed through the Horsham Transport Study.
- 6.3 There is also the potential for a cumulative impact on nitrogen deposition at the Mens SAC and a potential impact on the Cowfold AQMA as a result of increased traffic on the A272 from developments in combination with Chichester DC and Mid Sussex BC. This is being addressed through the Habitats Regulations Assessment of the Horsham District Local Plan.
- 6.4 Overall, when considering the cumulative impacts of the Local Plan Policies, significant and minor positive impacts were recorded against **SA Objective 1: Housing, SA 3: Inclusive communities, SA Objective 4: Crime, SA Objective 5: Health and Wellbeing and SA Objective 16: Sustainable economy.**
- 6.5 Mixed positive and negative impacts were found against **SA Objective 2: Access to Services and Facilities, SA Objective 6: Biodiversity, SA Objective 7: Landscape, SA Objective 8: Historic environment, SA Objective 9 efficient use of land, SA Objective 10 use of natural resources, SA Objective 11: Water Resources, SA Objective 12: flooding, SA Objective 13: Transport, SA Objective 14: Air Pollution and SA Objective 15: Climate Change.**
- 6.6 No Local Plan Policies were found to have a solely negative effect.

Temporary / Indirect Impacts

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

7.0 Mitigation

7.1 Table 3.0 below summarises the policies in the Local Plan that are expected to avoid, reduce, and mitigate the potentially negative effects of delivering development in the Local Plan in relation to each of the Sustainability Appraisal.

Table 3.0: Local Plan policies that would contribute to the mitigation of negative effects and/or enhancement of positive effects

SA Objective	Mitigation provided by Local Plan policies
SA1: Housing	<p>Strategic Policy 37: Housing Provision requires the delivery of a significant number of homes to meet identified housing needs.</p> <p>Strategic Policy 38: Meeting Local Housing Needs, Policy 39: Affordable Housing, and Policy 40: Improving Housing Standards in the District require that the housing stock delivers affordable homes, a mix of housing sizes and types to meet the needs of the District's communities and is of a high standard including meeting requirements for internal floor areas and storage space.</p>
SA2: Access to services and facilities	<p>Strategic Policies 2: Development Hierarchy support the development hierarchy in the District is likely to ensure a high number of residents have access to services and facilities close to where they live.</p> <p>Strategic Policy 23: Infrastructure Provision and Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District.</p> <p>Strategic Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA3: Inclusive Communities	<p>Strategic Policies 2: Development Hierarchy support the development hierarchy in the District is likely to ensure a high number of residents have access to services and facilities close to where they live.</p> <p>Strategic Policy 20: An additional criterion has been added to ensure development design is attractive and inclusive, meeting the needs of all users – with particular consideration given to disability age, gender and those with caring responsibilities.</p> <p>Policy 25 requires that cycle parking 'must be conveniently located' for users, and that plug-in charging facilities should be provided for electric cycles and mobility scooters</p> <p>Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for the delivery of development to create socially inclusive and adaptable communities.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA4: Crime	<p>Strategic Policy 19: Development Quality requires that development is provided to functional, accessible, safe and adaptable environments in Horsham District.</p> <p>Strategic Policy 20: Development Principles sets out the development principles for the District and includes a requirement for development to include measures to reduce actual or perceived opportunities for crime or antisocial behaviour.</p>
SA5: Health and wellbeing	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development and patterns of development which would help to encourage travel by walking and cycling, which could result in increased levels of physical activities among residents.</p> <p>Strategic Policy 23: Infrastructure Provision and Policy 28: Community Facilities, Leisure and Recreation directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District.</p> <p>Strategic Policy 27: Inclusive Communities, Health and Wellbeing directly addresses the delivery of development in Horsham to support healthy lifestyles and address health and wellbeing including the protection and enhancement of existing community facilities, services and open spaces.</p> <p>Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Strategic Policies HA2 HA3 and HA4 specify that the West of Ifield, North West of Southwater and East of Billingshurst developments includes a range of informal open space provision.</p>
SA6: Biodiversity and geodiversity	<p>Strategic Policy 13: The Natural Environment and Landscape Character protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p> <p>Strategic Policy 17: Green Infrastructure and Biodiversity requires that designated sites and habitats are appropriately considered as part of the development process and a minimum of 12% biodiversity net gain is achieved at development sites. Furthermore, development should maintain and enhance green infrastructure, the Nature Recovery Network and natural capital. There is also an additional requirement that Green Infrastructure should be integral to the design and layout of new development and that new linkages should consider Natural England's Green Infrastructure Guidance and the Councils Green</p>

SA Objective	Mitigation provided by Local Plan policies
	Infrastructure strategy. A new requirement for an appropriate buffer around woodland has also been added.
SA7: Landscape	<p>Strategic Policy 13: The Natural Environment and Landscape Character protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p> <p>Strategic Policies 14: Countryside Protection and 15: Settlement Coalescence limit the potential for development to encroach on the open countryside and the special character of this area as well as the potential for settlement coalescence.</p> <p>Strategic Policy 16: Protected Landscapes requires development to be respectful of the setting of protected landscapes, including the High Weald AONB and the adjoining South Downs National Park.</p> <p>Strategic Policies 19: Development Quality and 20: Development Principles set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p>
SA8: Historic environment	<p>Strategic Policies 19: Development Quality and 20: Development Principles set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p> <p>Policy 21: Heritage Assets and Managing change in the Historic Environment is set out to ensure the positive management of development affecting heritage assets, by requiring development to be considerate of the significance of heritage assets and to make a positive contribution to the character and distinctiveness of the area.</p>
SA9: Efficient land use	<p>Strategic Policy 2: Development Hierarchy sets out that development is to be permitted within the built-up area boundaries of settlements in the plan area, including on any suitable previously developed land.</p> <p>Strategic Policy 11: Environmental Protection states that development proposals should address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation.</p> <p>Strategic Policy 20: Development Principles set out that development should make efficient use of land and prioritise the use of previously developed land.</p>
SA10: Natural resources	<p>Strategic Policy 6: Climate Change is supportive of development which includes measures to help reduce the amount of biodegradable waste sent to landfill and promotes grey water recycling.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Strategic Policy 8: Sustainable Design and Construction requires development to incorporate measures to minimise construction and demolition waste and utilise recycled and to support grey water recycling.</p> <p>Strategic Policy 9: Water Neutrality requires development to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development.</p> <p>Strategic Policy 14: Countryside Protection is supportive of development in the countryside which would enable the extraction of minerals or the disposal of waste.</p>
SA11: Water resources	<p>Strategic Policy 6: Climate Change is supportive of development which includes measures to support the conservation of water supplies.</p> <p>Strategic Policy 9: Water Neutrality requires development to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development.</p> <p>Strategic Policy 10: Flooding requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS.</p> <p>Strategic Policy 11: Environmental Protection requires development to maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies.</p> <p>Strategic Policy 17: Green Infrastructure and Biodiversity is supportive of development which would maintain and enhance the green infrastructure network as well as existing freshwater features.</p> <p>Strategic Policy 23: Infrastructure Provision requires that the release of land for development is to be dependent upon sufficient capacity in the existing local infrastructure (including infrastructure relating to water supplies) to meet the additional requirements.</p> <p>Policy HA1: Strategic Site Development Principles states that proposals of this nature should deliver necessary new infrastructure to support the new development, including provision of utilities, water supplies and wastewater treatment.</p>
SA12: Flooding	<p>Strategic Policy 10: Flooding requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS. Development proposals are only to be supported where they follow a sequential approach to flood risk management.</p> <p>Strategic Policy 13: The Natural Environment and Landscape Character requires development to incorporate and maintain SUDS in an optimal location for their purpose</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>whilst also securing landscape enhancements and high-quality green spaces.</p> <p>Strategic Policies 17: Green Infrastructure and Biodiversity and 6: Climate Change are supportive of development which would maintain and enhance the green infrastructure network.</p>
SA13: Transport	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Strategic Policy 19 now has an additional criterion added to encourage low traffic neighbourhoods with good street design that prioritises pedestrians and cyclists.</p> <p>Strategic Policy 24 requires development prioritise sustainable travel.</p> <p>Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA14: Air quality	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Strategic Policy 11: Environmental Protection requires new development proposals to ensure that resultant air pollution is minimised and that they contribute to the implementation of Air Quality Action Plans.</p> <p>Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA15: Climate change	<p>Strategic Policies 6: Climate Change and 24: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport. Policy 36 also supports developments which contribute to achieving net zero carbon emission, by helping to encourage behaviours that reduce energy use and promoting the use of decentralised, renewable and low carbon energy supply systems.</p> <p>Strategic Policy 7: Appropriate Energy Use requires new development to contribute clean, efficient energy in the District. New developments must also demonstrate how they will provide zero and low carbon heating. Stand-alone renewable energy schemes are also supported by the policy. The policy now includes a new criterion to 'Be Seen' which will ensure energy performance is monitored, verified, and reported.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Strategic Policy 11: Environmental Protection requires new development proposals to ensure that resultant greenhouse gas emissions are minimised.</p> <p>Policy HA1: Strategic Site Development Principles states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also contribute to the achievement of zero carbon and be designed to minimise the need to travel by car.</p>
SA16: Economic growth	<p>Strategic Policy 26: Gatwick Airport Safeguarding safeguards land for the expansion of Gatwick Airport, which is identified to be of importance for District and the wider economy in the Gatwick Diamond.</p> <p>Strategic Policies 29: New Employment and 30: Enhancing Existing Employment support sustainable economic growth in the District up to 2040 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p> <p>Policy 31: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Policy 33: Equestrian Development and Strategic Policy 34: Tourism Facilities and Visitor support economic growth in equestrian and tourism which are important for rural locations.</p>
SA17: Access to employment opportunities	<p>Strategic Policies 29: New Employment and 30: Enhancing Existing Employment support sustainable economic growth in the District up to 2040 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p> <p>Policy 31: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Specific to strategic scale development, Policy HA1: Strategic Site Development Principles states that this type of development will be expected to provide new employment land to meet the principle of one new job per home.</p>

8.0 Monitoring and Next Steps

- 8.1 It is a requirement of the SEA Regulations require monitoring of the potential significant impacts of a plan be monitored to assess the outcome of the plan and the effectiveness of any mitigation. Horsham District Council will continue to monitor the effects of the plan as part of the Authority Monitoring Report which is published in December each year. Full details of the monitoring indicators are set out in the main Sustainability Appraisal Report.

Next Steps

- 8.2 If agreed by Council, the Horsham District Local Plan Regulation 19 will be published for a statutory six week consultation between the 19 January to 1 March 2024. This document will be published alongside a range of supporting evidence including the Horsham District Council Regulation 19 Sustainability Appraisal Report and this non technical summary.
- 8.3 Following this consultation, the Local Plan and accompanying SA/SEA Report will be submitted to the Secretary of State for public examination. Any proposed modifications to the Submission version of the Local Plan arising out of this process may require SA/SEA, which will be consulted upon, as necessary.

Appendix1: Summary of Sustainability Assessment changes for proposed strategic allocations

Large site Name	Proposed Local Plan Policy updates since July 2021	Summary of the Updated Sustainability Appraisal changes
SA101: West of Ifield	<p>Since 2021 the site promoters have confirmed that the overall amount of housing available on this site has changed to approximately 3,000 (previously 3,250). The Council is of the view that at least 1,600 homes can be completed within the plan period. The policy has been updated to reflect this.</p> <p>In light of other changes to the evidence base (including reflecting the proximity of Crawley town to this site), the policy now proposes at least 40% of all housing delivered (previously 35%).</p>	<p>No significant change. The proposal is still for a large-scale development and still scores as a strong positive effect against the criterion of housing delivery: there are no changes to the Council's overall conclusions. The West of Ifield remains a sustainable location for development, given the ability for this site to deliver a high quantum of housing development, including housing development close to a key employment centre. This site would make a sizable contribution to the District's identified housing need, including the provision of affordable housing and could potentially contribute to the unmet housing need within that District as part of the wider North West Sussex Housing Market Area (HMA).</p> <p>The site still scores positively for SA2: Access to services and facilities as it will still help to meet needs generated by Crawley including a new secondary school.</p> <p>Mitigation measures will be required to address the environmental impacts of development in this location including landscape impacts.</p>
SA118: Land East of Billingshurst	There have been no fundamental changes to the proposals or policy requirements since 2021.	No significant change to the Council's sustainability appraisal conclusions although it is considered that the wording of the policy and supporting text has been improved to help ensure the delivery of community facilities.
SA119: North-west of Southwater	Since 2021, the site promoters applied for outline planning permission for a greater quantum of development in this location than was initially appraised (1,500 homes). As part of this proposal the location of the secondary school and extent of development within the red line was changed.	The Council has considered the impacts of a decrease in housing below 1,200 in this location. Whilst this would still assist with the long-term provision of housing needs – the level of development likely to come forward in the plan period has not significantly changed since 2021. Therefore, the benefit against the housing objectives would not change significantly.

Large site Name	Proposed Local Plan Policy updates since July 2021	Summary of the Updated Sustainability Appraisal changes
	<p>The planning application was subsequently withdrawn, and the promoters have revised their plans such that only 1,000 homes will now be built. The proposal for a secondary school within the site remains. The Council is of the view that at least 735 homes can be completed within the plan period. The policy has been updated to reflect this. It retains the school in the location identified in the neighbourhood plan.</p>	<p>A development of 1,000 homes as opposed to 1,200 would have a lower adverse impact on the landscape. The provision of the school would not be in a location identified by the existing community as part of their neighbourhood plan This would continue to support community cohesion between the new and existing communities.</p>
SA291 West of Kilnwood Vale	<p>No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.</p> <p>There is existing outline planning permission for 2,750 homes which will not be built out until 2035. Without prejudice to future local plan reviews it is considered it would be premature to allocate further land in this Local Plan due to uncertainties of delivery timescales following on from the existing permitted development. A further reason for its removal is that the impact of water neutrality on delivery has reduced the overall amount of development that could be delivered in the District over the Plan period.</p>	<p>No significant change to the Council's sustainability appraisal conclusions.</p>
SA394: Rookwood	<p>Not applicable – The site owner has confirmed that the site is not available for development and no scheme is being progressed.</p>	<p>Not Applicable</p>
SA459/SA674/SA846: Land East	<p>Since 2021, the site promoter has indicated that they would bring forward a larger scale development of</p>	<p>No significant change to the Council's sustainability appraisal conclusions. Whilst a larger scale development in this location is likely</p>

Large site Name	Proposed Local Plan Policy updates since July 2021	Summary of the Updated Sustainability Appraisal changes
of Kingsfold	around 2,150 homes as a single new settlement – compared with around 1000 homes originally as a set of interlinked smaller settlements. The promoter has indicated there is the potential for a new railway station to be provided as part of the development alongside enhancements to the stretch of the A24 which runs through the existing settlement of Kingsfold. An extension to the existing employment offer to the south east of the site is proposed, along with community facilities and sustainable transport options. The site was not previously recommended as an allocation and remains not included.	<p>to perform better against the sustainability criteria of housing delivery, the impact against SA Objective 1: Housing was already a significant positive and so the scoring for this objective has not changed.</p> <p>Similarly, although a new railway station is proposed, its delivery is not certain, and the location of the development would continue to lead to a high level of reliance on private car use to access Horsham to the south. As such the impacts on SA Objectives 2 and 13 are still considered to be mixed significant negative and positive impact and mixed minor negative and positive respectively. The scale of the development would continue to have an adverse impact on the landscape (SA7).</p>
SA744 (includes SA225)/SA668: West of Billingshurst	The site was previously not included as an allocation and this has not changed.	No significant change to the Council’s sustainability appraisal conclusions. Whilst the site promoter’s leisure use proposals have further evolved, there is no change to the overall quantum of development, nor the uses proposed. The earlier SA previously appraised the site overall favourably against SA2: Access to services and facilities and against SA5: Health and wellbeing and overall, unfavourably on a number of environmental objectives. This remains the case.
SA754: Horsham Golf & Fitness Club	Since 2021, the site promoter has submitted an outline planning application - the proposals would bring forward an increased level of development (around 800 homes) compared with earlier schemes presented.	<p>Yes: Although a larger scale development in this location will perform better against the sustainability criteria of housing delivery, other impacts from the 2021 sustainability appraisal have had a greater negative impact.</p> <p>In particular, the site is not of a scale or in a location where it would provide significant new community facilities to meet day to day needs (e.g. education / retail) rather than the proposed sporting facilities, this would increase the number of people travelling to other services and facilities – increasing adverse impacts against sustainability</p>

Large site Name	Proposed Local Plan Policy updates since July 2021	Summary of the Updated Sustainability Appraisal changes
		criterion SA13 Transport, SA14 Air Quality and SA17: Access to Employment
SA085/SA520/SA524 /SA539/SA790: Ashington cluster	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the Council's sustainability appraisal conclusions. It was not recommended for allocation in 2021 and this remains the case.
SA414: Land North East of Henfield (Mayfield)	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development. The site has formally withdrawn the site from consideration for the current Local Plan Review.	Not Applicable
SA597: Adversane	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the Council's sustainability appraisal conclusions. It was not recommended for allocation in 2021 and this remains the case.
SA716: Buck Barn	No significant updates proposed to this site by the site promoter in terms of scale / quantum of development.	No significant change to the earlier sustainability appraisal conclusions. However, of the sites that had been included as allocations in the July 2021 version of the Regulation 19 Local Plan, this site was the least well performing of the potential strategic sites when assessed against SA objectives, and the least favourable when considered against the Local Plan objectives. Given the impact of water neutrality on the plan this site was therefore recommended be removed as an allocation.

Appendix 2: Summary of the effects of the Local Plan Policies on the SA Framework

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

Strategic Policy 15: Settlement Coalescence	-?	0	0	0	0	++	++	+	0	0	0	+	+	+	+	-	0
Strategic Policy 16: Protected Landscapes	-?	0	0	0	+	++	++?	+	0	0	0	+	0	0	0	+/-	0
Strategic Policy 17: Green Infrastructure and Biodiversity	0	0	0	0	++	++	+	0	0	0	++	+	+	+	++	0	0
Policy 18: Local Greenspace	0	0	+	0	+	++	+	+	0	0	0	+	0	0	0	0	0
Development Quality, Design and Heritage																	
Strategic Policy 19 Development Quality	+	0	+	+	++	+	++	++	+	0	+	+	+	+	+	+	0
Strategic Policy 20: Development Principles	+	0	++	+	++	+	++	+	++	0	0	+	+	+	+	+	0
Policy 21: Heritage Assets and Managing Change within the Historic Environment-	0	0	0	0	0	+	++	++	0	0	0	0	0	0	0	0	0
Policy 22: Shop Fronts and Advertisements	0	0	+	0	0	0	++	++	0	0	0	0	0	0	0	+	0
Infrastructure, Transport and Healthy Communities																	
Strategic Policy 23: Infrastructure Provision	+	++	++	+	++	0	0	0	0	0	+	0	+	+	+	0	0
Strategic Policy 24: Sustainable Transport	0	++	++	0	++	0	0	0	0	0	0	0	++	++	++	++	++
Policy 25: Parking	0	+	++	+	+/-	0	0	0	0	0	0	0	+/-	+/-	+/-	+	++
Policy 26: Gatwick Airport Safeguarding	+/-	0	0	0	-?	-?	-?	-?	0	0	0	0	-	-	-	++	+
Strategic Policy 27: Inclusive Communities, Health and Wellbeing	+	++	++	+	++	0	0	0	0	0	0	0	+	+	+	+	++
Policy 28: Community Facilities, Leisure and Recreation	0	++	++	+	++	+	+	0	0	0	0	0	+	+	+	0	0
Economic Development																	
Strategic Policy 29: New Employment ¹	0	++	+	0	+	--?	--?	--?	--	-?	0	-	+/-	+/-	+/-	++	++
Strategic Policy 30 ⁷ : Enhancing Existing Employment	0	+/-	+	0?	+/-	-?	+/-?	+/-?	+	-?	0	0	+	+/-	+	++	++
Policy 31: Rural Economic Development	0	0	+	0	+/-	+	+	+	0	0	0	0	-	-	-	++	++
Policy 32: Conversion of Agricultural and Rural Buildings to Residential Uses	+	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 33: Equestrian Development	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	+	0
Strategic Policy 34: Tourism Facilities and Visitor Accommodation	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	++	+
Strategic Policy 35: Town Centre Hierarchy and Sequential Approach	0	++	++	0	+	0	+	+	0	0	0	0	+	+	+	++	+
Strategic Policy 36: Town Centre Uses	+	++	++	0	+	0	+	+	0	+	0	0	+	+	+	++	+

Strategic Policy 37: Housing Provision	++	++/-	+	0	+/-	--?	--?	--?	--+	--?	-	--?	++/-?	++/-	++/-	++/-	++/-
Strategic Policy38: Meeting Local Housing Needs	++	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Policy 39: Affordable Housing	++/-?	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 40: Improving Housing Standards in the District	++	0	+	0	+	0	+	+	0	0	0	+	0	0	0	0	0
Policy 41: Rural Exception Homes	++	+/-	+	0	0	0	+/-	+/-	-	0	0	0	+/-	+/-	+/-	0	+/-
Policy 42: Retirement Housing and Specialist Care	++	+	++	0	+	0	0	0	0	0	0	0	+	+	+	0	0
Strategic Policy 43: Gypsy and Travellers²	++	+/-	++	0	+/-	-?	--/+?	+/-?	+/-	--/+	+/-	+/-	+/-	+/-	+/-	0	--/+
Policy 44: Rural Workers' Accommodation	+	-	+	0	0	0	+	+	+	0	0	0	-	-	-	++	++
Policy 45: Replacement Dwellings and House Extensions in the Countryside	++	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 46: Ancillary Accommodation	+	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0
Strategic Site Allocations																	
Strategic Policy HA1: Strategic Development Principles	++	++?	+?	0?	++/--?	--?	--?	--?	-	--?	-?	-?	++/-?	++/--?	+/-	++	++
Strategic Policy HA2: West of Crawley Area of Search and Land West of Ifield (Site SA101)	++	++?	+?	0?	++/--?	++/--?	--/+?	--/+?	-	--?	+/-?	+/-?	++/-	++/--?	++/-?	++	++
Strategic Policy HA3: Land West of Southwater (Site SA119)	++	++?	+?	0?	++/-?	--/+?	--/+?	--/+?	--?	--?	0	-?	++/-?	++/-?	++/-?	++	++/-?
Strategic Policy HA4: Land East of Billingshurst (Site SA118)	++	++/-?	+?	0?	++/-?	--/+?	+/-?	--/+?	--?	--?	+/-?	-?	++/-?	++/-?	++/-?	++	++/-?
Settlement Site Allocations																	
Strategic Policy HA5: Ashington (Site ASN1 – originally appraised as SA866)	++	+?	0	0?	+	-?	--?	0?	-	--?	0	-	+	0	+	0	+
Strategic Policy HA6: Barns Green (Site BGR1 – originally appraised as SA006)	++	+?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA6: Barns Green (Site BGR2 – originally appraised as SA510)	++	+?	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA7: Broadbridge Heath (Site BRH1- – originally appraised as SA386)	++	++/-?	+	0?	+	-?	-?	--/+?	--?	--?	0	-	+	0	+	+	+
Strategic Policy HA7: Broadbridge Heath (Site BRH2 – originally appraised as SA622)	++	++	+	0?	+	-?	--/+?	0?	-	--?	0	-	+	0	+	+	+
Strategic Policy HA8: Cowfold (Site CW1 – originally appraised as SA076/SA083)	++	+?	0	0?	++	0?	--/+?	--?	--?	--?	0	-	+	--/+	+	0	+

Strategic Policy HA8: Cowfold (Site CW2 – originally appraised as SA609)	++	+	0	0?	++	0?	--/+?	--?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA8: Cowfold (Site CW3 – originally appraised as SA610/SA611)	++	+	0	0?	++	0?	+/-?	--/+?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA9: Henfield (Site HNF1 – originally appraised as SA317)	++	++/-?	0	0?	+	--?	--/+?	--/+?	--?	--	0	-	+	0	+	0	-
Strategic Policy HA10: Horsham (Site HOR1 – originally appraised as SA074)	++	++?	0	0?	+	--?	--/+?	-?	-	0	0	-	++	0	++	0	++
Strategic Policy HA10: Horsham (Site HOR2 – originally appraised as SA568)	++	++/-?	0	0?	+	0?	-?	0?	--?	--?	0	-	++	--	++	0	++
Strategic Policy HA11: Lower Beeding (Site LWB1 – originally appraised as SA567)	++	+	0	0?	+	-?	--/+?	+/-?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA11: Lower Beeding (Site LWB2 – originally appraised as SA584)	+	+	0	0?	+	-?	--?	--/+?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA12: Land North of the Rosary (West of Church Road)	++	+	0	0?	++	0?	-?	--?	--?	--?	0	-	+	0	+	0	+
Strategic Policy HA12: Land North of the Rise Land at Dunstons Farm	++	+	0	0?	++	-?	-?	--?	--?	--?	0	-	+	0	+	0	+
Strategic Policy HA13: Pulborough (Site PLB1 – originally appraised as SA112)	++	++/-?	0	0?	+	--?	--/+?	-?	-	--?	0	-	++	0	++	0	+
Strategic Policy HA13: Pulborough (Site PLB2 – originally appraised as SA556)	++	++?	0	0?	++	--?	--/+?	-?	--?	--?	0	-	++	0	++	0	+
Strategic Policy HA14: Rudgwick and Bucks Green (Site RD1 – originally appraised as SA574)	++	+	0	0?	++	-?	--/+?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA14: Rudgwick and Bucks Green (Site RD2 – originally appraised as SA794)	+	+	0	0?	++	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA15: Rusper (Site RS1 – originally appraised as SA080)	++	+	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA15: Rusper (Site RS2 – originally appraised as SA872)	++	+	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA16: Small Dole (Site SMD1 – originally appraised as SA689)	++	-?	0	0?	+	--?	+/-?	0?	--?	--?	0	+/-	+	0	+	0	+
Strategic Policy HA17: Steyning (Site STE1 – originally appraised as SA742)	++	++	0	0?	++	--?	-?/+	--?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA18: Storrington Village (Site STO1 – originally appraised as SA361/SA732)	++	++?	0	0?	++	--?	--/+?	--/+?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA18: Storrington Village (Site STO2 – originally appraised as SA384)	++	++?	0	0?	++	--?	--/+?	+/-?	-	--?	0	-	+	--/+	+	0	+
Strategic Policy HA19: Thakeham (Site TH1 – originally appraised as SA039)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+

Strategic Policy HA19: Thakeham (Site TH2 – originally appraised as SA873)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
Strategic Policy HA20: Warnham (Site WN1 – originally appraised as SA071)	++	+	0	0?	+	0?	--/+?	0?	--?	--?	0	-	++	0	++	0	+
Strategic Policy HA21: West Chiltington and West Chiltington Common (Site WCH1 – originally appraised as SA066)	++	+	0	0?	+	+	-?	--/+?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA21: West Chiltington and West Chiltington Common (Site WCH2 – originally appraised as SA429)	++	+/-?	0	0?	-	+	--/+?	-?	--?	-?	-	-	-	0	-	0	+
Strategic Policy HA21: West Chiltington and West Chiltington Common (Site WCH3 – originally appraised as SA500)	+	+	0	0?	+	+	-/+?	+/-?	--?	--?	-	-	+	0	+	0	-