



Sussex
Wildlife Trust

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Horsham District Local Plan 2019 -36 Regulation Consultation (Regulation 18)

The Sussex Wildlife Trust (SWT) recognises the importance of a plan led system as opposed to a developer led process and supports Horsham District Council's (HDC) desire to produce a cohesive Local Plan. Therefore we hope that our comments to this regulation 18 consultation are used constructively to make certain that the plan properly plans for the natural capital needed within the district and ensures that any development is truly sustainable.

Overview

SWT have read the plan in its entirety and do not have confidence that the information presented by HDC within the consultation provides sufficient opportunity to constructively comment on the best and most sustainable spatial strategy for development. We are concerned that the plan in its current form is **not sound** when considered against the National Planning Policy Framework (NPPF) 2019. This is because it has failed to use a suitable evidence base to adequately consider and plan for the natural environment and the climate resilience needed for the district's future. As it stands, the plan is neither consistent with national policy nor justified, as required by paragraph 35 of the NPPF.

At the time of writing this response, the global and national economy is being severely impacted by the Covid-19 pandemic, we urge HDC to acknowledge this issue and its ramifications seriously when considering the progress and suitability of the plan currently proposed.

Environmental Evidence Base

For all Local Planning Authorities (LPAs) using current and up to date information to inform decisions is fundamental. It is important for HDC to recognise that they should be investing in the ongoing assessment of the District's natural environment, so that when it is formulating Local Plans or other key strategies, HDC has a clear understanding of the District's natural assets, how they function and where the connections are or are needed. This can then be used to effectively inform process such as the SHLAA from the earliest of stages. It will also help identify what additional environmental evidence is required during the formulation of the Local Plan. HDC must take seriously that the protection of core wildlife sites, local designations and the value of the wider countryside is a clear requirement of sections 171 and 174 of the NPPF.

In light of this, when assessing the evidence presented as part of the draft Local Plan consultation, SWT is concerned that there appears to be a clear lack of environmental information being used to inform the entire plan making process.

The plan is proposing 9 strategic allocations for consideration. We acknowledge that the plan does state that not all the allocations will proceed to Regulation 19, but as a minimum we would expect HDC to consider the

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basics of the biodiversity impacts of these sites. This should be both in the wider strategic context and the clear requirement for a measurable net gain as per paragraphs 171 and 174 of the NPPF.

It appears that the information presented for each strategic site has been provided by the developer with very little analysis from HDC. This has resulted in inconsistencies in the way the information is presented and what 'benefits' are actually achievable (please see our detailed comments on the housing section below).

We also note that while Chapter 7 section 7.32 talks about identifying key Strategic Green Infrastructure, the plan fails to list any documents related to this in its evidence base. This raises concern about the degree to which this information is being used to assess the impacts of the allocations and inform positive areas for contribution, as per 171 of the NPPF.

SWT believes that there is a fundamental flaw in this local plan. Namely that the spatial strategy and potential site allocations are being decided without an up to date picture of the current extent and quality of the District's ecological network and natural capital assets. Therefore, the plan cannot be considered sound in terms of delivering sustainable development.

Climate Change

Climate change is widely acknowledged as the biggest threat facing biodiversity. The NPPF is clear that the planning system should help to '*shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience*'. SWT cannot see that there has been proper consideration of impacts on climate change or the Government's legally binding target of net zero emissions within the Climate Change Act 2008 (As Amended). In particular, the consideration of climate change related issues appears confined to the Sustainability Appraisals. However, even within these documents almost all narratives and justifications around the scoring of SA objective 15 (climate change) for small and strategic sites relate to transport, and indeed most of the matrices contain identical scoring and justifications for SA objective 15 and SA objective 13 (transport). There appears to be no consideration of how carbon is currently captured by different habitats within the district or how this, and indeed the potential for increases in carbon capture through habitat enhancement and creation, may be impacted by the different growth options and spatial strategies.

Sustainability Appraisal (SA)

Overall, SWT is disappointed with the SA accompanying the local plan. The text is very wordy with convoluted sentences which makes it difficult to follow. The actual assessment of sites and potential growth options is very generalised. Several of the SA objectives like wellbeing (SA5) and crime reduction (SA4) are not capable of differentiation between sites, whilst others, such as minimising travel (SA13), air pollution (SA14) and climate change (SA15) overlap considerably (as noted above). The result is that sites have differences only on a few odd factors and therefore we cannot see how this document helps HDC make an informed decision about the most sustainable spatial strategy.

This is perhaps best displayed in paragraph 1.138 of the Interim Sustainability Appraisal Non-Technical Summary of Site and Growth Options that states '*No one overall quantum of growth or spatial strategy stands out as being markedly superior in sustainability terms when compared to the others*'.

Paragraph 32 of the NPPF states that SAs should demonstrate how plans have addressed the relevant economic, social and environmental objectives and that significant adverse impacts on these objectives should be avoided. However looking at the Interim SA of strategic sites and growth options we cannot see that this has been done for SA objective 6 (Biodiversity).

All 6 spatial strategy options in chapter 2 come out as an overall significant negative effect likely. In chapter 3, the lower growth option results in minor negative effects whilst the medium and higher growth options result in a significant negative effect likely. For the large site options in chapter 4, 10 of the 11 sites considered have significant negative effect likely, whilst the final site results in mixed significant negative and minor positive effects (although these are uncertain). Paragraph 5.15 states that the majority of the 66

small site options are expected to have negative effects in relation to SA objective 6 and finally all growth scenario options in chapter 6 result in significant negative effects (again uncertain).

It is unacceptable to proceed with a plan that so clearly will have significant effects on biodiversity, particularly as they remain unquantified and poorly understood. This is contrary to the principles of sustainable development and the requirements of the NPPF. Whilst any level of development has the potential to negatively impact on biodiversity, SWT believes that the conclusions of the SA are heavily influenced by the generalised nature of the assessment. The lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue.

It appears to SWT, that the inability to clearly differentiate between options within the SA is due to insufficient resources having been invested in determining the natural assets that are needed to allow a resilient and sustainable future. Once this information is clearly in place, the potential allocations and growth options could be overlaid and a sensible and constructive consultation could be had about the future of the district.

Overarching Conclusion

Given our concerns over the environmental evidence base and the SA, SWT wishes to make clear its position that the plan is unsound and we do not think that this plan should proceed in its current format. A robust environmental evidence base should be produced that can be used to inform the suitability both individually and in combination of the proposed strategic allocations and the overall spatial deliverability of the Local Plan. This revised plan should then be consulted on again through the Regulation 18 process.

SWT will now proceed to provide further comment on individual aspects of the Draft Local Plan review. Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in **bold** and deletions are ~~struck through~~:

Introduction

The Introduction states in section 1.4 that in order to understand the needs and issues facing the District a collection of studies have been undertaken to inform the local plan. As mentioned, above, we are concerned that the official evidence base for the local plan, as referenced on the website¹, fails to have any documents that clearly look at the implications of the council's approach on the Natural Environment. We acknowledge the presence of a HRA and Sustainability Appraisal, but these documents consider a small number of internationally protected sites and wider sustainability issues. It is not clear what the evidence base is in terms of the district's ecological assets.

SWT expects much more from this council. As a minimum, preliminary ecological appraisals of the potential strategic allocations should be provided. The allocations should then be set in the context of wider environmental information about the whole District. As it stands we do not see an evidence base that allows an informed decision to be made about the impacts of this plan on the environment and in particular ecological networks and natural capital assets. This is especially concerning as section 1.7 states that this document sets out the framework for the protection and enhancement of the natural environment. Further to section 2.12 of the plan states that Horsham prides itself in its corporate plan as having an excellent record of dealing with environmental matters.

¹ <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

Planning Context

This section references the importance of up to date evidence. As said above, we do acknowledge the presence of the HRA and the Sustainability Appraisal. These are a clear requirements for the Local Plan to be found legally compliant – however please see our comments below on the accuracy of these documents. What SWT is concerned with is that we do not see the presence of an up to date green infrastructure study or even consistent desktop ecological analysis for the potential strategic sites. The NPPF is clear that plans should take a strategic approach to maintaining and enhancing both green infrastructure and ecological networks (paragraph 171) and that all policies should be informed by relevant and up-to-date evidence (paragraph 31).

Section 2.9 of this plan discusses the relationship between the area within the Horsham LPA and South Downs National Park (SDNP) Planning Authority. The SDNP has a clear drive for the consideration and delivery of ecosystem services through its Local Plan. How has this been considered and translated into the way Horsham has cooperated with the SDNP over the Horsham Local Plan, as per section 171 of the NPPF.

Chapter 3 – Spatial Vision and Objectives

We are pleased to see the Natural Environment and District Character recognised in section 3.13 of the Local Plan. We feel that this statement would be improved by including the need for measurable net gains and reflect the requirement of section 174 of the NPPF. We therefore propose the following amendment to this paragraph:

*3.13 The rich heritage and high quality natural environment, and the significant contribution this makes to the overall attractiveness, economic competitiveness and identity of the district is recognised and promoted, developing the close links with the South Downs National Park Authority. The ecological resources will be enhanced **and there will be a measurable net gain to biodiversity which** contributes to the wider nature recovery network and the historical and cultural character of the built environment. Green spaces and the landscape are valued, enhanced, and promoted, ensuring an attractive place for communities, business and welcoming additional visitors.*

Section 3.14 needs to recognise the role of natural solutions in climate change, we therefore suggest the following amendments:

*3.14 The environmental resources and quality of the area **will be understood, enabling it to be** ~~have been~~ maintained and enhanced, **so that natural solutions contribute to climate resilience.** There will be a low carbon economy with energy efficient development, including District heating and renewable energy together with new development that has been designed to be low carbon and is flexible to ensure than new technologies can be incorporated as they become available. Development will be adaptable to the impact of climate change and will mitigate these effects.*

Spatial Objectives

We have reviewed the spatial objectives for the plan and are encouraged to see the inclusion of the environment. We note that objective 9 references environmental net gain, which is an emerging prospect. We do not feel the reference to including biodiversity enhancements is sufficient when section 174(b) of the NPPF is clear about the delivery of measurable biodiversity net gain. SWT would like this objective amended as follows:

Objective 9

*To safeguard and enhance the environmental quality of the District, ensuring that development brings forward environmental net gains including **measurable biodiversity net gain enhancements**, and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding.*

It is also important to appreciate that while the sentiment of the objective is good, SWT again questions its deliverability against the backdrop of a poor evidence base.

Strategic Development Principles - Protection of the District Character and Environmental Net Gain

SWT welcomes the inclusion of this principle and the acknowledgement of the importance of ecosystem services. We note that section 3.28 express the need for these environmental aspects to be integrated with social and economic objectives. SWT supports an integrated plan-led approach that gives equal weight to these principles in order to achieve a sustainable future. In order to achieve this the council must ensure all of these aspects are given equality in the decision making process.

Further to this, we welcome the recognition regarding the importance of master planning in development (section 3.29). However, any masterplan needs to fit into a wider vision for the district that has clearly identified the most sustainable locations for development.

Chapter 4 – Policies for Growth and Change

Strategic Policy 4 - Horsham Town

For point of reference it would be beneficial to have a small insert map to explain the extent of cover for this policy. We feel that this policy would benefit from additional wording that reflects the multifunctional benefits of retaining formal and informal green space within the town as per 174(a) of the NPPF 2019. We therefore suggest the following amendments to bullet point 6. Further to this we also recommend the inclusion of new bullet point 7:

*6. Retains, enlarges or enhances the existing formal and informal green space within town **to ensure these assets can deliver towards the district's strategic vision for Green Infrastructure.***

*7. **Integrates creative and measurable net gains for biodiversity***

Chapter 5 – Economic Development

Strategic Policy 6: Economic Growth

SWT is concerned that this policy relates to strategic allocations which have failed to consider how sustainable economic growth is linked to natural capital and ecosystem service delivery on those allocations, this in contradiction to section 170(b). A holistic approach is needed to ensure that there is recognition that the natural environment provides economic growth. We therefore make the following recommended amendments to this policy:

Sustainable economic growth, including support for existing businesses for the period up to 2036, will be achieved through the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. This will be achieved through:

- 1. The allocation of sufficient sites from land identified in the table below for employment. The provision will be expected to be well-designed, suitable for incorporating a range of unit sizes and flexibility in use with appropriate regard to floor to ceiling heights, floor loading, power, servicing and loading facilities;*
- 2. Within Horsham Town, particularly within or near the centre and train station, office development (Use Classes B1a and B1b) will be permitted where this adds to the overall stock of Grade A offices and subject to the submission of evidence demonstrating any adverse impacts would not significantly outweigh the benefits;*
- 3. Retention, redevelopment, regeneration, intensification and smart-growth of existing employment sites in accordance with Strategic Policy 7 - Employment Development;*
- 4. Taking a positive approach to the formation of small start-up businesses, home-working and home-based businesses, and proposals that seek the retention of existing businesses within the District;*
- 5. Requiring major developments to provide appropriate ICT infrastructure, such as high-speed broadband and full fibre, as an integral part of all forms of development, to provide businesses with the flexibility to operate anywhere;*
- 6. Requiring proposals to maintain and enhance the attractiveness of the District to ensure it is an attractive place to stay and visit, to increase the value of all economies, including tourism, retail and leisure;*

7. Encouraging sustainable local economic growth through Neighbourhood Development Plans; and,
8. Encouraging the expansion of higher education facilities related to research and development and employment training activity.
9. **Requiring proposals to identify, maintain and enhance the existing biodiversity value and natural capital delivery of the allocated site prior to development.**

Policy 8 – Rural Economic Development

We are encouraged to see that this policy wording provides recognition for biodiversity and the need to enhance it.

Policy 9 - Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Units

We are pleased to see the recognition of the potential impact on biodiversity within section 5.22 of the supporting text. We do however feel that the wording within the paragraph does not adequately reflect the mitigation hierarchy, which stipulates avoiding impacts as the first step. We therefore recommend the following amendments to the support text in section 5.22:

5.22 Given the rural location of these sites, applicants would need to be mindful of the potential impact of any proposal on biodiversity. Rural buildings may, for example, contain bat roosts or nest habitats for protected species such as barn owls. Applicants should therefore be aware that it might be necessary to undertake an ecological surveys investigation to ensure that they inform the need to and implement the mitigation hierarchy. This will require impacts to be avoided. If they cannot be avoided suitable mitigation will be required and as a last resort like for like compensation. Further to this there will be a need to deliver as well as biodiversity enhancements/net gain in accordance with the Council's biodiversity policies.

Chapter 6 – Housing

SWT is very concerned that this consultation is asking the public and statutory bodies which housing number to set when the three options available do not appear to relate to an evidence base. It is clear from the standard methodology that HDC must deliver around 1000 homes a year. However, the larger options of 1,200 and 1,400 do not appear to correlate with the expected unmet need from Crawley and other neighbouring areas.

The figures in strategic policy 14 appear arbitrary when there is no clear number for unmet need and particularly when the evidence base against which the sustainability of these options should be considered is so poor. SWT reminds HDC that paragraph 35 of the NPPF explains that plans should accommodate unmet need from neighbouring areas 'where it is practical to do so and is consistent with achieving sustainable development'.

We also note that there seems to be no housing land supply calculation based on the new housing figures, therefore there is no guide as to how much strategic site will need to deliver. It is extremely difficult to consider the likely cumulative impacts of the draft plan when so little information is provided on the likely level and spread of housing allocations.

SWT requests that further consultation on this issue is undertaken once a clearer picture of the true unmet need figure that HDC will be expected to absorb is available. This question is absolutely fundamental to the Housing section of the plan and it should not be left until the Regulation 19 consultation before the public can give their views.

SWT also notes that paragraph 6.16 states that there is no guarantee that there will not be issues outside of HDC's control, such as a national economic downturn, which would limit the delivery of homes. Given that at the time of writing this response, the global economy is being severely impacted by the Covid-19 pandemic, **we urge HDC to acknowledge this issue seriously when considering the progress and suitability of the plan currently proposed.**

Potential Housing Allocations – Site Suitability

SWT has considered the Site Assessment Report and we are concerned that the Site Assessment Criteria appear to only have been shared with site promoters for feedback prior to this consultation. SWT would have liked to have had the opportunity to comment on the criteria and their application before this stage.

We do agree with the principle of framing the criteria around the three objectives of sustainable development as per the NPPF. Additionally we approve of the questions that make up the criteria for Biodiversity contained in Appendix 1. These cover protected habitats and species, along with irreplaceable habitats, ecosystem services and green infrastructure. However, we are concerned that whilst the questions in the assessment criteria do cover a wide range of indicators of biodiversity value, any assessment is only as good as the evidence being assessed. The summary of paragraphs 174-177 identifies that the NPPF requires that plans safeguard components of wider ecological networks, however SWT is not clear from the evidence documents published as part of the consultation what HDC considers to be the wider ecological network of Horsham.

SWT does disagree with some of the RAG ratings given for the strategic sites – please see our comments below. However, our wider concern is how the conclusions of the site assessment process marry together with the conclusions of the Sustainability Appraisal. Looking at biodiversity in isolation, the scorings within the Interim SA of strategic sites and growth options do not seem to correlate with the biodiversity RAG rating for the strategic sites.

We also question whether there has been any consideration of the impacts of sites on the potential for net gains. Without development there will always be the potential to create linkages between existing habitats and sites of value. **However, with development that does not sit within a strategic framework of habitat potential, this important opportunity could be lost and any attempt at net gain is unlikely to be as beneficial.** It is vital that HDC considers all the sites in this context and this will require more detailed evidence of the current ecological network and actual deliverability.

Potential Housing Allocations – Deliverability and Viability

SWT is concerned that the viability of the strategic sites appears not to have been tested in detail. A number of the requirements in the Site Assessment Criteria, which are needed for a site to score positively, can easily be lost when a proposal comes forward due to viability. We do not currently have confidence that any of these sites will be able to deliver the required infrastructure, affordable housing, low carbon technologies and the required minimum 10% net gain to biodiversity. This is backed up by the statements in section 2.9 of the Interim SA of strategic sites and growth options. Without further information on the realistic financial viability of each site, we cannot see how their sustainability or suitability can be assessed. **A site certainly should not be favoured simply because a promoter is offering, at this early stage, to provide more so called benefits.**

Potential Housing Allocations – Short listed sites

SWT is very concerned that we are being asked to assess the potential housing allocation options, with only vague information on the likely impacts in terms of sustainability and in particular ecology. The RAG assessment for each of the 9 strategic sites appears to be based entirely on what the site promoter has put forward, rather than any work by HDC to find the most sustainable locations for development. SWT very much believes in a plan-led system, however as it stands the draft plan seems to be developer led. We acknowledge that the plan does state that not all the allocations will proceed to Regulation 19, but as a minimum we would expect HDC to consider the basics of the biodiversity impacts of these sites. This should be both in the wider strategic context and on a site specific level, and fulfil the clear requirement for a measurable net gain as per paragraphs 171 and 174 of the NPPF.

The strategic site assessments are very crude and appear to fundamentally conflict with the conclusions of the Interim SA of strategic sites growth options. In particular, paragraph 4.23 of the Interim SA of strategic sites growth options states that *'an uncertain significant negative effect is expected for all the sites in relation to*

SA objective 6: biodiversity. In contrast, the RAG rating for biodiversity for the majority of the 9 strategic sites comes out as 'neutral' and for one site 'favourable'.

SWT understands that the site assessment criteria includes consideration of whether an impact can be mitigated and whether a commitment to a net gain has been made. However as stated already above, the deliverability of this is down to both the current biodiversity value of the site and the viability of the mitigation and net gain against all the other 'benefits' a proposal must deliver. Given that no ecological surveys have been provided for these strategic sites and that further work on viability is needed, we do not have faith in the conclusions of these assessments. It is also not clear whether the promised net gain is on site. We remind HDC that any net gain should be in addition to the normal requirements of the mitigation hierarchy.

SWT acknowledges that lots of factors affect where development can go, not least land ownership. However, HDC states in section 3.7 of this plan that the environments and habitats of the District are under increasing threat, including from increased development pressure. Yet there seems to have been no real effort put in to creating a sound evidence base of the District's current ecological network on top of which, potential development sites could be overlaid. SWT would expect some investigation into the ecological and natural capital capacity of the district in order to enable the allocation of large sites to be done strategically.

We are also concerned about the realistic impacts on climate change given that the drop in boards for all 9 sites state that 'development in this location will increase traffic and car use in the area'. Given that we are a long way from everyone in the District owning electric vehicles, we cannot see how any of these sites comply with HDC's commitment to contributing to achieving a net zero carbon target.

Given the lack of ecological information provided against which to assess the suitability of the 9 potential strategic sites, SWT objects to all sites and would not wish to see any of them move forward to inclusion in the submission plan without further detailed analysis and opportunity for comment. As a minimum, preliminary ecological appraisals of the potential strategic allocations should be provided. The allocations should then be set in the context of wider environmental information about the whole District.

SWT will provide comments on our immediate concerns for each of the sites, however these comments are limited due to the lack of strategic environmental evidence. We will not repeat the issues which are common across all sites (already mentioned above).

Land at Adversane, West Chiltington Parish (Kingswood)

The isolated nature of this site is a fundamental concern as we cannot see how the site can be considered sustainable in terms of transport and climate change impacts (see section 4.36 of the Interim SA of strategic sites and growth options). It seems that the deliverability of a new station has not been tested and as the drop in board states 'development in this location will increase traffic and car use in the area'.

As stated above, the promise of net gains should not result in a favourable RAG score for biodiversity when no information of how these gains will be delivered in relation to the District's wider ecological network and the onsite areas of value such as ancient woodland and hedgerows.

Land East of Billingshurst (Little Daux)

This is the only potential strategic site that has an unfavourable RAG score for biodiversity. This appears to be because the developer has not committed to providing net gains. This reveals a fundamental issue with the conclusions of the site assessment criteria namely that a developer promising net gains, but providing no further detail or evidence that this is deliverable, automatically scores favourably. This should not be the case.

We note that this site also scores unfavourably for climate change because the developer has made no clear commitments to low carbon technology. We wish to reiterate that the way these strategic sites are being

assessed it extremely developer lead. Surely it is for the council to set the policy requirements that the developer must comply with. It should not be a question of whether a developer/promoter agrees with the requirement, but whether these requirements will be deliverable and contribute to a wider strategy.

SWT is concerned that this allocation will completely isolate Wilden's Meadow LWS and that there is no commitment towards Rosier Wood LWS. There also appear to be no evidence presented as to how these two sites interact as components of the District's ecological network. We did note that the adjacent LWS was not included in the summary information on the drop in banner for this site. We are also aware of numerous records for protected species on this site.

Land West of Billingshurst (Newbridge Park)

SWT is concerned about the proximity of this site to the Upper Arun SSSI and the Wey & Arun Canal, River Arun & adjacent meadows LWS. The LWS does not appear to be considered in the site assessment, although there is acknowledgement of potential impacts on the SSSI. This is the only site that does not result in only significant negative effects in the Interim SA table 4.1, instead the SA concludes mixed significant negative and minor positive effects (uncertain). This appears to be due to a promise of a large country park, although again no further information about this aspect of the proposal or its deliverability is available for this consultation.

Land at Buck Barn, West Grinstead (Weald Cross)

This is a vast site and although no detailed information has been made available, it is clear that it comprises of a network of ancient woodland, hedgerow and grassland. SWT is very concerned about severe ecological impacts on this network. In particular the Downs Link, Nutham Wood and Greatsteeds Farm Meadow LWS and the connectivity of the site with the Knepp Estate which is another core wildlife site within the District.

SWT disagrees with the neutral RAG score for biodiversity and do not believe this score can be accurate given the lack of a preliminary ecological appraisal for the site. This is clearly a site where there needs to be the consideration of the current potential for increased connectivity and habitat gains, before any development can be considered. Regardless of this, the site is clearly extremely unsustainable in terms of transport and would be a big backwards step in terms of achieving net zero carbon emissions.

Land West of Crawley, Rusper

The full extent of the site is not clear as the commentary in the site assessment and in the SA appear to refer to different ecological receptors. For example, the site assessment states that the site contains a SSSI, although looking at the red line map it is not clear where this is, we believe House Copse SSSI sits outside this area. We understand that a wider area is being considered. It is vital that the true red line boundary is made clear and whether the site promoter's commitments relate only to this area, for example the estimation that 50% of the land will remain as open space.

SWT is very concerned about the impacts on Ifield Meadows LWS as presumably it will be surrounded by development. No comment has been made as to how this will impact on its functionality within the District's wider ecological network. We are also concerned about the reality of a true biodiversity net gain when the proximity to Gatwick could restrict the types of habitats that could be created/enhanced.

SWT could not find any mention of Willoughby Fields LNR which is concerning given its proximity to the area of search for the link road. This is a fundamental issue and again we cannot agree with the neutral RAG score for biodiversity.

Land at Kingsfold, Warnham (North West Horsham)

SWT fundamentally disagrees with the neutral RAG score for biodiversity. This is contrary to the assessment criteria as the promoters have indicated that ancient woodland will be destroyed by the road upgrades to the A24. Ancient woodland is an irreplaceable habitat, the loss of which cannot be mitigated for, therefore

the correct RAG score should be red – very negative. The planned destruction of ancient woodland is unacceptable and contrary to NPPF paragraph 175.

As not detailed proposals have been provided it is not clear how the promoters envisage the site, however SWT is concerned that the small ‘blob’ jutting out of the eastern side of the site is separated from the rest of the area by ghyll woodland along Boldings Brook. It is not clear how this area would be accessed from the main development without severing this important linear feature and priority habitat.

Land North East of Henfield (Mayfield)

This is a vast site and although no detailed information has been made available, it is clear that it comprises of a network of ancient woodland, hedgerow, wetland and grassland. SWT is very concerned about severe ecological impacts on this network. SWT disagrees with the neutral RAG score for biodiversity and do not believe this score can be accurate given the lack of a preliminary ecological appraisal for the site. This is clearly a site where there needs to be the consideration of the current potential for increased connectivity and habitat gains, before any development can be considered.

This appears to be the most unsustainable site in terms of transport. It cannot be realistic to assume there would be no outwards commuting or general travel and we are very concerned about the likely impacts on red listed birds, such as nightingale. The allocation of this site would clearly be a big backwards step in terms of achieving net zero carbon emissions and we strongly disagree that the development of this site could have positive effects for climate change when it is so isolated.

Land at Rookwood, Horsham

SWT is very concerned about the impacts of this allocation on Warnham LNR and disagree with the neutral RAG scoring. Again no detailed proposals or ecological evidence has been made available, but we cannot see how development of the northern portion of the site will not sever the LNR and isolate it from the District’s wider ecological network. It is clear that such a high density of development in such close proximity to the LNR will result in increased recreational pressure and other forms of disturbance.

As a site designated for its biodiversity value, Warnham LNR is a core area within the District’s ecological network. HDC should be seeking to extend and buffer this site with high quality habitat and improve its connectivity. This is contrary to allocating this area for a high density residential development.

Land West of Southwater, Southwater

SWT is very concerned that the site assessment and drop in banner do not mention the presence of Courtland Wood LWS in the centre of this allocation. Additionally whilst the site assessment contains very specific detail about the potential for biodiversity net gain i.e. ‘scheme would provide 8% habitat biodiversity and 38% gain in linear features of biodiversity, together with 50 acres of open space’, the wider context of this information is not available. It is therefore impossible for us to assess the suitability or deliverability of this commitment. The site contains a network of hedgerows, woodland and grassland and it is not clear how this connects to the wider area, particularly via the strip of ancient woodland directly south.

The assessment for the transport criteria refers to road upgrades rather than sustainable transport options so the favourable RAG score is not accepted.

Smaller Scale Development

Given the number of smaller scale allocations and the relatively short consultation period for this local plan, SWT is not able to give detailed comments on each potential allocation in this section of the plan. However, we do have some overarching concerns about both the site assessment process and the spatial allocation of smaller scale sites.

SWT has the same fundamental concern for the smaller scale development as for the strategic sites, namely that without an up to date ecological evidence base, it is impossible to assess the suitability of these sites in terms of likely biodiversity impacts and the potential for any gains.

In particular, there appear to be a number of worrying assumptions made in the Site Assessment Report about both the biodiversity value of the sites and the ability for any impacts to be avoided and mitigated. There is a general narrative for many of the sites with potential for allocation (section 3.01) that grassland is automatically of low biodiversity value, however it is our understanding that no ecological surveys have been carried out for these sites and therefore there is no assessment of the quality of the habitats on these sites.

Many of the site assessments for the sites listed in Table 1 also have the same narrative for biodiversity that further detailed ecological assessment will be needed if a site is allocated to 'ensure that mitigation and biodiversity net gain could be provided'. SWT cannot see how this method of plan making, whereby a sites suitability for development is assessed after allocation, can be seen as sound in terms of deliverability. Surely HDC needs to see that mitigation and biodiversity net gain is deliverable before allocation occurs. Otherwise the council risks allocating sites that will not be permitted for development due to conflicting with Strategic Policy 31.

In addition to our concerns over the individual site assessments, we are also not clear how the assessment of suitability has been applied in terms of which sites have been considered as having potential for allocation i.e. ended up in Table 1. Looking at the Site Assessment Report a number of sites are being considered for allocation that have an Unfavourable Combined RAG rating.

SWT is also concerned that the decision to allocate additional sites of over 50 dwellings appears arbitrary given that there is no updated figures for housing supply presented. The term 'smaller scale housing requirement' used in Table 1 implies that these figures are a requirement i.e. they are needed to ensure that the HDC meets its OAN and 5 year housing supply. However no calculation of how many homes smaller scale development will be expected to deliver is presented in the draft plan.

The smaller scale housing requirement set out in Table 1 again seems to be very developer-led rather than an assessment of capacity for sustainable development. In particular, it is not clear why Ashington, which is only a medium village, has a far larger housing requirement than anywhere else. Looking at the Site Assessment Report, it simply appears to be because a large amount of development has been promoted for this village and found potentially suitable.

We reiterate again that the allocation of sites, even smaller scale sites, needs to be done in a strategic manner. HDC should be looking at the District's ecological network and assessing which sites have the potential for both negative and positive impacts on this network.

Strategic Policy 15 – Strategic Site Development Principles

SWT strongly supports the inclusion of strategic policy 15 and in particular the requirement for landscape-led development. We ask that point 2 is amended as follows to make clear that biodiversity impacts must be avoided, before there is any consideration of mitigation as per the mitigation hierarchy:

2. Masterplans will be expected to identify key areas of biodiversity enhancement, demonstrating that a minimum of 10% biodiversity net gain can be achieved. It is expected that the proposed development will **avoid impacts on biodiversity through good design**, responding to and complementing existing features, and that any SuDs features will be incorporated into the provision of biodiversity gain and wider green infrastructure provision.

Chapter 7 Conserving and Enhancing the Natural Environment

As with other chapters this one starts with how the policies will address issues. We suggest that there should be amendments to reflect the need for planning to deliver measurable net gains to biodiversity (NPPF paragraph 174b). Further to this we have made amendments in order to reflect more appropriate wording:

The policies in this document will address the following issues:

- The high-quality environment makes Horsham District an attractive place to live and work. As well as contributing to the high quality of life, it plays an important role in attracting and retaining businesses. It is therefore important to ensure that it is maintained and enhanced.
- Increased traffic has led to a reduction in air quality in the district. There are Air Quality Management Areas in Storrington and Cowfold. The impact of increased traffic on air quality in the rest of the District will need to be considered and mechanisms to improve air quality should be put into place.
- Opportunities to redevelop and clean up any sites which have become contaminated through past uses should be investigated.
- Water quality in the District is overall, moderate to good. New development will need to ensure that increased levels of wastewater are treated to ensure that there is no deterioration in these levels and that enhancements are made where possible.
- There is a continued need to protect and enhance nationally and locally designated landscapes, habitats, species and ancient woodland;
- In addition to protecting designated sites, other habitats and species should be protected and enhanced to maintain **and create** a functional ecological network within and beyond the District boundaries.
- **The delivery of a measurable net gain to biodiversity during the lifetime of the plan.**
- **That the natural capital required to ensure sustainable development is understood, valued, protected and enhanced.**
- The population should be given the opportunity to access a high-quality natural environment, **whilst ensuring negative impacts are avoided without damaging it.**

Environmental Quality

Sections 7.1 -7.2 of the supporting text talk about the overall health of the District as being good. We are keen to understand how this has been assessed by HDC.

Policy 25: Strategic Policy: Environmental Protection

Having looked at this policy we propose the following amendments in line with paragraph 180c of the NPPF:

The high quality of the District's environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to, and the emission of, pollutants including noise, odour, vibration, air and light pollution arising from all stages of development. Development proposals must ensure that they:

- 1. Address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation. Proposals where contamination is known or suspected, or the site is within the vicinity of contaminated land, must be accompanied by a Land Contamination Assessment;*
- 2. Are appropriate to their location, taking account of ground conditions and land instability;*
- 3. Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevent contaminated run-off to surface water sewers;*
- 4. Minimise the impact of lighting on neighbouring uses ~~and~~ the wider landscape **and biodiversity**, including potential glare and spillage. Proposals where illumination is to be installed must be accompanied by a Lighting Assessment...*

Strategic Policy 27: The Natural Environment and Landscape Character

Section 7.18 of the support text for this policy states that: '*Neighbourhood Plans and development proposals will need to demonstrate that proposals contribute to the multi-functional network of green spaces, water and other environmental features in urban and rural areas known as Green Infrastructure. Green Infrastructure includes trees,*

parks, road verges, allotments, cemeteries, woodlands, rivers and wetlands. The Council's Green Infrastructure Strategy identifies current and potential future provision of Green Infrastructure.'

The evidence base for the local plan review does not include a green infrastructure strategy and we keen to know why this is? To our knowledge HDC last GI strategy was undertaken in 2014. There have been clear leaps forward in this area since that time and we would strongly recommend that this evidence base is updated and fit for purpose to enable clear spatial impacts of proposed allocations to be considered against current and proposed green infrastructure, as per section 171 of the NPPF.

Section 7.18 refers to the partnership between HDC and SWT. As an organisation we keen to work with HDC to ensure that biodiversity, and the emerging concept of Nature Recovery Networks, are embedded in all aspects of its work. However, we must make it very clear in our response that this work is likely to be underway after the Regulation 18 and possible Regulation 19 consultations for this local plan. We do not think this work should be confused with the clear need for HDC to understand the spatial environmental impact of their proposed allocations and provide an adequate evidence base at the time of public consultation.

HDC has a clear responsibility under section 40 of the NERC Act 2006 to consider biodiversity in the decisions that it takes. Further to this they should have a clear understanding how the allocations in this plan will impact or deliver towards a resilience landscape with the pressure climate change will bring as per section 149 of the NPPF. We know that HDC is keen to be a progressive council making the best decisions for the natural environment. Therefore the Local Plan needs to reflect that approach and be a key component in delivering a sustainable future for the District's natural environment.

While we are supportive of Strategic Policy 27, subject to the amendments we have proposed below, we ask if HDC believe that the policy is sound with the current evidence that is in place.

We proposed amendments to Strategic Policy 27 as follows:

The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats, will be protected against inappropriate development. The Council will expect development proposals to be landscape led from the outset so that they clearly inform the design and layout. Proposals will also be required to:

- 1. Protect, conserve and enhance the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintain settlement separation;*
- 2. Maintain and enhance the **strategic** Green Infrastructure Network, the Nature Recovery Network and, where practicable, help to address any identified deficiencies in the District;*
- 3. Maintain and enhance the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and secure **measurable** net gains in biodiversity;*
- 4. Incorporate SUDS into a scheme in an optimal location for their purpose whilst also securing landscape enhancements and good quality spaces. Proposals will be expected to provide details to demonstrate that the whole life management and maintenance of the SUDS are appropriate, deliverable and will not cause harm to the natural environment and/or landscape; and*
- 5. Where applicable, conserve and, where possible, enhance the setting of the South Downs National Park and the High Weald Area of Outstanding Natural Beauty.*

Strategic Policy 29 - Settlement Coalescence

SWT questions the suitability of the questions within the supporting text for this policy. Although we are pleased that HDC is considering designating green belt land, we question the openness of the consultation and ask if this is due to the lack of environmental evidence informing this local plan, in particular in terms of understanding the spatial impacts of the potential strategic allocations. If the consultation questions have arisen due to the potential for coalescence, then there needs to be clear direction from HDC as to where the areas of concern are. In particular, the potential need for Green Belt designation in the event of different growth options and combinations of strategic allocations being taken forward.

SWT would be concerned to see a Regulation 19 submission plan come forward that proposed Green Belt without further public consultation on this issue. Similarly, we do not currently seek amendments to Strategic Policy 29, however this may change depending on which, if any strategic allocations are taken forward and / or the inclusion of green belt land.

Strategic Policy 30 - Protected Landscapes

SWT supports the recommendations made by the High Weald AONB in their response in relation to this policy.

Strategic Policy 31 - Green Infrastructure and Biodiversity

This policy contains lots of positive language for the benefit of biodiversity and we are very encouraged by HDC's desire to create a policy that seeks to deliver biodiversity net gain.

The policy in its current form has pulled together the areas of Green Infrastructure (GI) and Biodiversity and as a result it is very dense. Paragraph 16 of the NPPF states that plans should '*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*'. SWT suggests that this policy would benefit from greater clarity and recommend that it is separated into two distinct policies.

We make this suggestion because GI is based on multifunctional delivery, and therefore can deliver a wide number of benefits including but not limited to, access, health and wellbeing, carbon capture, flood alleviation and biodiversity in a range of locations, such as play parks, allotments, road verges, Local Wildlife Sites, green walls and roofs. Although GI can be important for delivering, protecting and enhancing biodiversity and potentially net gain, it is not concerned solely with biodiversity. We have seen other LPA produce policies which fail to consider GI adequately which is concerning given the massive potential it has to bring gains across the three objectives of sustainable development.

SWT therefore feels that two robust policies; one covering biodiversity and the other GI, will provide a clear approach for developers in terms of what is expected of them in relation to Chapter 15 of the NPPF. We also feel this is of importance to the District given the links within the SDNP and its adopted plan that is progressive in its approach to the natural environment. SWT would be happy to work with HDC on the formulation of these two policies.

The supporting text for this policy is already split into two distinct areas for GI and biodiversity and therefore we do not necessarily think these areas need major adaptations, however we have made comments below:

Comments on Green Infrastructure supporting text

Sections 7.32 and 7.33 reference the green infrastructure study, we again highlight that this document is not available as part of the evidence of the plan. This needs to be addressed as it states that assets and opportunities have been identified, it is therefore important to see how these opportunities can be delivered in the light of the development proposed in the draft local plan.

Comments on Biodiversity supporting text

As a matter of clarity, we wonder if the reference in section 7.35 should relate to the LNP or perhaps it should acknowledge the role of both the LNP and LEP partnerships.

Section 7.37 references that the policy will seek to deliver 10% net gain. While we are pleased that this will be clear in policy, we feel that the approach laid out in this paragraph relies too heavily on individual pockets of information relating to biodiversity. To deliver the best form of net gain, HDC will need to draw all that biodiversity information together and have a strategic approach, potentially the Nature Recovery Network concept. This will ensure that where it is not possible to deliver net gain onsite, there can be a clear, coherent

and strategic delivery to ensure that net gain is providing the maximum benefits for biodiversity, rather than piecemeal pockets of habitat creation.

Comments on policy wording

SWT would welcome an active discussion with HDC to identify the best way forward for effectively progressing this policy. It currently contains many good points but we feel that making clear distinctions in some areas will make it more effective.

Although we would be keen to explore the editing of this policy with HDC, as a minimum we would recommend the following amendments:

1. Development ***proposals should be submitted with up to date ecological information. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure, the Nature Recovery Network, natural capital and biodiversity. Proposals that would result in the loss of existing green infrastructure or part of the Nature Recovery Network will be resisted avoided unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.***
2. Proposals will be expected to retain and enhance existing fresh water features, hedgerows, trees and deciduous woodland and the provision of additional hedgerow and tree planting will be sought subject to appropriate consideration of local and wider context, habitats and species.
3. Where the felling of a tree is necessary, for example due to disease, replacement planting with a suitable species and location to retain the link with the wider network of habitats and Green Infrastructure, will be required.
4. Development proposals will be expected to remove invasive species and will be required to contribute to the enhancement of existing biodiversity. ***Impacts on biodiversity must be avoided, where this is not possible mitigation and compensation will be required. In addition to this, and deliver, as a minimum, a 10% net gain will be required in line with the Defra Metric, this should be achieved*** through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, to off-set the delivery to the Nature Recovery Network.
5. Proposals should create and manage appropriate new habitats, taking into account pollination, where practicable. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity, and where appropriate the Nature Recovery Network, through the creation of green spaces, and linkages between habitats to create local and regional ecological networks and allow the movement of wildlife through development sites.
6. Particular consideration will be given to the hierarchy of sites and habitats in the District as follows:
 1. Special Protection Area (SPA) and Special Areas of Conservation (SAC)
 2. Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs)
 3. Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of Ancient Woodland, traditional orchards, local geodiversity or other irreplaceable habitats not already identified in a & b above.
7. Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance to nature conservation, development will be refused unless it can be demonstrated that:
 1. The objectives of a site's designation, where applicable, and integrity of the area will not be undermined;
 2. The reason for the development clearly outweighs the need to protect the value of the site; and,
 3. That appropriate mitigation and compensation measures are provided.
8. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.

Policy 32 - Local Green Space

We are pleased to see the supporting text for this policy acknowledge the role these areas can play in Green Infrastructure.

Chapter 9: Climate Change and Flooding

Strategic Policy 37 - Climate Change

This policy is split into two distinct sections, we ask HDC if they would consider the carbon reduction section going further and having a bullet point that recognises the carbon sequestration potential of a site. This would mean that there would be a requirement for the developer to acknowledge habitats that are important for carbon sequestration and seek to avoid loss to those habitats as per 170(b) of the NPPF.

We welcome that the section on climate change adaptation recognises the role of GI. SWT suggests that this bullet point should include a reference to the importance of connectivity and function of habitat for a climate adaptation, as per section 170(d) of the NPPF.

With these thoughts in mind we make the following recommendation to the policy:

Carbon reduction

Development proposals are expected to include measures which contribute to achieving zero carbon. Major development proposals will be expected to attain a 19% reduction of the Dwelling Emission Rate when compared with the 2013 Edition of the 2010 Building Regulations (Part L) (equivalent to the code for sustainable homes level 4). Schemes will be expected to demonstrate how this target will be attained. The Council will be supportive of a range of measures to achieve this target, including but not limited to:

- 1. Influencing the behaviour of occupants to reduce energy use;*
- 2. Reducing the amount of energy used in construction and operation of new buildings, including through the materials used in construction;*
- 3. The use of decentralised, renewable and low carbon energy supply systems including solar panels and ground source heat pumps;*
- 4. Using patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport; and*
- 5. Incorporating measures that reduce the amount of biodegradable waste sent to landfill.*
- 6. Identify habitats that are important for carbon sequestration and seek to avoid loss to those habitats by development.***

Climate change adaptation

All major development must demonstrate how it has been designed to adapt to the impacts of climate change and reduce vulnerability, particularly in terms of flood risk, water supply and changes to the District's landscape. Such measures should include:

- 1. Use of site layout. Wherever possible new buildings should be orientated to maximise the opportunities for both natural heating and ventilation and to reduce the exposure to wind and other elements;*
- 2. Design measures to maximise resistance and resilience to climate change, for example through the use of solar shading, thermal mass, heating and ventilation, green and brown roofs and green walls;*
- 3. Green infrastructure and dual use Sustainable Urban Drainage Systems (SuDS) to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration **by creating a connected and functioning landscape**; and*
- 4. Measures which promote the conservation of water and/or grey water recycling...*

Policy 39 - Sustainable Design and Construction

We are pleased to see that this policy has a clear bullet point that recognises the need for development to incorporate measures that enhance biodiversity as per section 174 of the NPPF.

Strategic Policy 40 – Flooding

Having reviewed this policy SWT would like to suggest the following amendment to bullet point 4:

- 4. Consider the vulnerability and importance of local **and wider** ecological resources such as water quality and biodiversity when determining the suitability of SuDS. New development should undertake more detailed*

assessments to consider the most appropriate SuDS methods for each site. Consideration should also be given to amenity value and green infrastructure.

Chapter 10 – Infrastructure, Transport and Healthy Communities

Strategic Policy 41 - Infrastructure Provision

Having read the supporting text for this policy, we feel that it fails to convey the importance of the natural environment as infrastructure. We would suggest that section 10.1 of the supporting text is amended to reflect this as follows:

*10.1 Infrastructure is a wide term and is used to refer to a range of services **which can be both natural and man-made** such as roads, railways, public transport water supplies, electricity, education and healthcare facilities, and sport and recreation, **high quality accessible open space** and other community facilities. The delivery of this infrastructure is fundamental to developing great places to live that are self-sustaining communities.*

Strategic Policy 42 - Sustainable Transport

Although the progression of sustainable transport is not a main focus of our charitable objectives, SWT is keen to see a sustainable approach to development that will help to reduce carbon emissions and the damage, noise and light pollution and severance of the natural environment caused by new roads and the increased use of existing roads. The modes of transport we chose are part of that culture shift. Therefore we have made a proposed amendment to the policy that requires sustainable transport modes to be in place and operational prior to occupation, in order for new residents to establish that behaviour straight away.

'There is a commitment to developing an integrated community connected by a sustainable transport system. In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.

Development will be supported if it:

- 1. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods.*
- 2. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.*
- 3. Prioritises and provides safe and accessible walking and cycling routes and is integrated with the wider network of routes, including public rights of way and cycle paths.*
- 4. Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions.*
- 5. Delivers better local bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport.*
- 6. Develops innovative and adaptable approaches to public transport in the rural areas of the District.*
- 7. Maintains and improves the existing transport system (pedestrian, cycle, rail and road).*
- 8. Is accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development of the wider area, or as a result of needing to address an existing local traffic problem.*
- 9. Ensures that sustainable modes of transport required for the delivery of the development are in place and operational prior to first occupation.*

Policy 44 – Gatwick Airport Safeguarded Land

SWT is surprised to see this policy as it appears to be in contradiction to the evidence presented, and the proposed policy approach of the proposed submission Crawley Local Plan (Regulation 19) that has recently been out for consultation. We would hope that the two LPAs are working together to address the future of the area and the cross boundary issues and relationships between the two Local Authorities.

CONCLUSION

We hope that HDC finds the SWT comments constructive as the draft Local Plan moves forward. We acknowledge that at the start of the consultation for this Local Plan review the Country and District were in a very different place. We feel it is imperative that HDC recognise the global, national and local shifts that are taking place. More than ever Horsham needs a Local Plan that delivers a vibrant, healthy and sustainable future that truly values that natural environment.

We have talked extensively in our response about the need for HDC to have an up to date environmental evidence base to inform plan making from the earliest stages. As a minimum we would expect this to include:

- Up to date Green Infrastructure Strategy that identifies assets and potential for enhancements to connectivity and function
- Nature Capital and Ecosystem Services Assessment
- Council-led Preliminary Ecological Appraisal of potential strategic sites
- More detailed Sustainability Appraisal that allows clearer conclusions

The plan should not go forward to the submission stage without further public consultation once this evidence base is in place.

If you would like to discuss any points Sussex Wildlife Trust have raised, please do get in contact.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust