

Horsham Local Plan Examination

Written statement from Save West of Ifield

Submitted by Fenella Maitland-Smith on 22nd November 2024.

Matter 10, Issue 1 - Whether the Plan would be able to be monitored effectively to ensure timely delivery and trigger the need for review?

Q3. Overall does the Plan deal adequately with uncertainty?

Although we are not planning professionals, we feel that this Plan is being developed in an environment of some very particular and significant uncertainties, not least:

1. Water neutrality
2. Economic and geopolitical factors
3. Changes to the NPPF
4. Climate change
5. Gatwick expansion

It seems surprising therefore not to find in the Plan any high-level discussion of these uncertainties and the risks they pose to delivery of the Plan. We note, for example, that the Plan discusses flooding risk at some length, but there is little discussion of the uncertainties and risks around housing delivery.

With so many significant sources of uncertainty and risk it must be the case that a number of key assumptions will have been made during the plan-making process. But there is no discussion of these assumptions, and the risk to their validity over time.

As discussed in our Reg 19 response to Policy 37, the Plan does not adequately address the future uncertainty around the constraints of water neutrality.

Obviously, the Plan is being made during a period of uncertainty due to water neutrality. But this is not addressed and the implications of and contingencies for this uncertainty are not discussed. Instead paragraphs 10.11 – 10.13 offer a number of opaque statements alluding to house-building at a rate of 777 houses a year on average over the Plan, although this could increase to 1,130 houses a year after five years. But there is nothing which informs policy or decision-making. The plan makes no provision for the infrastructure which would be required to deliver these potential housing numbers.

In fact, the reduction in annual average targets – from 911 to 777 over the Plan – is not significant.

More significant is the fact that the five year review of the Plan will explore possibilities to revert to targets based on objectively assessed need (OAN) as calculated by the Standard Method, ie 911 a year on average. The review will also consider the potential to accommodate around 50% of Crawley's unmet need. Given Crawley's unmet need is stated in the Crawley draft Plan as 445 houses a year, it seems Horsham considering adding 220 to its OAN of 911 houses a year, ie increasing the Horsham housing target to 1,130 houses a year. This is not explained, or the implications considered, in the Plan.

And if the Government's proposed changes to the Standard Method are applied then Horsham could be looking at 1,300 OAN plus 220 DtC (see Chart 1), ie double the requirement of the HDPF, and so presumably double the rate of population growth to around 20% over 10 years. Plus, there may be additional pressure on Horsham to provide housing for other constrained neighbouring LPAs via DtC, given their OANs will also increase.

The Plan should be updated to acknowledge these possibilities, their likelihood and the implications.

At a more detailed level, our Reg 19 responses and our other written statements for this Examination are clear that we have concerns about the lack of information (data) supporting the Sustainability Appraisal (SA) and therefore the robustness (or uncertainty) around the findings.

We don't feel that HDC are addressing the uncertainty about existing habitats and biodiversity across the District and more specifically across and around proposed development sites. And hence the uncertainty around the impacts of development.

There is nothing in the Local Plan or Evidence Base to show that, to the extent that habitat and biodiversity has been material to the plan-making, the choices made between strategic sites and the decision to allocate the West of Ifield has been based on, or is supported by, any ecological survey data or analysis. No such data or analysis has been made public. Nor evidence of consultation with neighbouring authorities, local wildlife groups or local naturalists and communities. The decision-making and the scoring and comparison of the various sites in the Sustainability Appraisal, in terms of biodiversity appears to be based on nothing more than a desk-top exercise using (very partial) records in the SxBRC and DEFRA's Magic tool.

To support our view, we reproduce here the comments at Regulation 18 stage from Sussex Wildlife Trust (/6192¹) as summarised by HDC:

'States that the assessment of sites and potential growth options is very generalised. Several of the SA objectives such as wellbeing (SA5) and crime reduction (SA objective 4) are not capable of differentiation between sites, whilst others, such as minimising travel (SA objective 13), air pollution (SA objective 14) and climate change (SA objective 15) overlap considerably. Argues that the sites therefore have differences only on a few actors and the SA does not help the Council make an informed decision about the most sustainable spatial strategy.

Highlights text at paragraph 1.138 of the Interim SA NTS 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. Looking at the Interim SA it is stated that this has not been done for SA objective 6: Biodiversity.

States that 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 effects likely, whilst one further site is expected to a mixed significant negative and minor positive effect (although these are uncertain). Also highlights that 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 uncertain significant negative effects.

States that the plan should not be taken forward as **the significant effects on biodiversity remain unquantified and poorly understood**. 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. Argues that **the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue**'.

HDC response:

The SA includes the SA framework to appraisal the potential effects of the Local Plan. SA objectives have been worked to form this framework by identifying the key sustainability issues for the District and considering the policy context for the preparation of the Local Plan and the SA as described in Chapter 3 of the Interim SA Report for the Reg 18 Local Plan. While some of the SA objectives overlap the appraisal questions included for each SA objective (see the Table 1.1 - SA Framework for the Horsham Local Plan Review of the Interim SA Report for the Reg 18 Local Plan) allow for consideration of different elements of the potentially overlapping themes.

¹ [Final-SA-Report-for-Horsham-District-Local-Plan-Reg-19-Appendices-document.pdf](#)

The SA has identified nuanced differences between the different spatial strategy options considered. It included initial recommendations for the approach to the spatial strategy for the Local Plan (see from paragraph 2.208 of the Interim SA of Growth Options) which then informed the preparation of the nine more spatially specific growth scenarios that could be included in the Local Plan Review. These were subsequently appraised as part of Interim SA of Growth Options report.

In relation to the appraisal of biodiversity included through the SA work, as the consultee has stated, any level of development has the potential to negatively impact on biodiversity and the SA has reflected this. The appraisal of site options has reflected the SA assumptions (Appendix A of the SA of Growth Options) and the potential for development to have implications in relation to nearby international, national and local biodiversity sites. This work has reflected Natural England's Impact Risk Zones (IRZs) making use of details of the types of proposals which could pose potential risks to these designations. The findings of the HRA have been reflected in this iteration of the SA to ensure findings in relation to European sites are also incorporated.