



Homes
England

Horsham District Local Plan 2023-2040 Examination in Public

Matter 4 – Conserving and Enhancing the Natural
Environment

Hearing Statement

Date: November 2024



Issue 2 – Whether the approach to the natural environment, biodiversity, landscape, coalescence, countryside, green and blue infrastructure and local green space is justified, effective, consistent with national policy and positively prepared?

1. Introduction

- 1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site HA2 in the Horsham Local Plan 2023-2040.
- 1.2 This statement supplements Homes England’s previous representations to the Horsham District Local Plan Regulation 19 consultation.

Q3 - Is Strategic Policy 15: Settlement Coalescence sound?

- 1.3 As noted within our Regulation 19 representations, we have significant reservations about Policy 15 which appears to unintentionally restrict growth of existing settlements.
- 1.4 As drafted, the policy applies to the entire District as there is no clear designation of where settlement coalescence would be occurring in the context of the Policy. It could easily be interpreted that the policy would conflict with all the strategic development allocations within the plan which would, by their nature, reduce openness and breaks between existing settlements and result in urbanizing effects within these existing breaks. There is, therefore, a very real risk that future planning applications are refused due to a breach with this policy, the plan should not be considered sound unless the strategic allocations are explicitly excluded from this policy.
- 1.5 This is clearly not the intention of the plan, when read as a whole. The strategic allocations have all been individually tested for their impact on landscape and townscape considerations taking into account strategic gaps between settlements etc... It surely is not, therefore, the LPAs intention for these sites to be tested against Policy 15 when subsequent planning applications are determined for these sites.

- 1.6 As a minimum, therefore, to make the plan as a whole effective by not precluding the strategic allocated sites, we suggest that the policy is amended. We re-enforce our Regulation 19 submission that the policy should explicitly exclude strategic sites from this policy test so it is clear that there would not be a conflict with this policy when these strategic sites are being assessed. We suggest that criteria 1 of the policy should be re-worded as follows:

1. With the exception of sites allocated in this plan, development between settlements will be resisted unless it can be demonstrated that the proposal meets all of the following criteria:

2. Q5 - Is Strategic Policy 17: Green Infrastructure and Biodiversity sound?

Is the requirement for relevant development proposals to deliver at least 12% biodiversity net gain justified and effective?

- 2.1 Homes England supports the aspiration for 12% biodiversity net gain to be achieved in principle but has concerns that the evidence base is not fully justified within the supporting evidence base, particularly the Viability Assessment (evidence base document H12). The approach, however, is inconsistent the national policy and national guidance which notes:

Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.¹

- 2.2 In the context of the guidance, the plan lacks supportive evidence as to the need for the higher percentage, nor how this higher percentage could be delivered through specific opportunities.
- 2.3 References to the implication of the additional 2% within the Aspinall Verdi Viability Assessment are provided at a relatively generic level identifying that the additional 2% uplift requires relatively insignificant costs. However, at 8.113, in relation to the West of Ifield development, the assessment notes that *“this site may require offsetting of biodiversity enhancements to achieve the Council’s policy requirement of 12% net gain. We have therefore included the additional offsetting contribution of £1,092,000 in our*

¹ National Guidance: Biodiversity Net Gain Paragraph:006 Reference ID:74-006-20240214

appraisal". To clarify, initial BNG Assessments at West of Ifield indicate that it can deliver the full 12% uplift on-site without requirement for off-site credits. We maintain the policy test requires greater and an assurance that it is flexibly applied so it is not at the expense of other priorities in the plan, however, it is not considered to be a fundamental problem to the feasibility / viability of the West of Ifield strategic development site.

Q6 - Is criterion 8 consistent with national policy and legislation?

- 2.4 No, the policy is absolute in the requirement for development "must" conserve, restore and enhance priority habitats. The test at paragraph 185 of the NPPF is that plans should promote the conservation of these habitats but at paragraph 186 notes that if significant harm to biodiversity cannot be avoided then adequate mitigation, or, as a last resort, compensation, should be provided. Criterion 8 should, therefore, be re-worded to ensure full consistency with the NPPF.