

Horsham Local Plan Examination

Written statement from Save West of Ifield

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

Matter 4, 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?

Question 5: Is Strategic Policy 17: Green Infrastructure and Biodiversity sound?

Extracts from our Reg 19 response - Green Infrastructure and Biodiversity – Policy 17

1. HDC's Local Plan is unsound because it fails to comply with NPPF policies:
 - a. 174 and 179 – the Plan policies on biodiversity and nature recovery are weak, superficial and inconsistent, particularly given the scale of greenfield development being proposed elsewhere in the Plan.
 - b. The judgements made in the Sustainability Appraisal cannot be sound given they seem to be based on a presumption of a strong strategy and set of policies for protecting and enhancing habitat, biodiversity and ecological networks. For example, Local Plan strategic policy 17 and the Evidence Base do not stand up to scrutiny against the SA 6 Appraisal Questions. There is a focus on the internationally and nationally designated assets, which could lead to a positive appraisal against SA 6.1. But the lack of meaningful policy in relation to local designated assets, ancient and protected woodland, ecological networks, and net gain should preclude positive assessment against 6.2 and 6.3.
2. Sussex Wildlife Trust provided a number of strongly negative comments at Regulation 18 stage (/6192¹ and see Annex A to our Reg 19 response), concluding 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 Sustainability Appraisal are heavily influenced by the generalised nature of the assessment. SWT 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's response was to defend and not revise the approach taken, except to include the findings of the Habitats Regulations Assessment.
3. HDC's assessment and understanding of existing and potential biodiversity value across all Strategic Sites is inadequate and so the scoring and comparison of the sites in the Sustainability Appraisal (SA) is highly questionable – discussed further in our Reg 19 response to Policy 17, section 3a, pages 7 – 9.
4. Also at Regulation 18 stage Natural England observed (/5834¹⁹) that the SA framework reference to restoration or enhancement of biodiversity is limited to 'ecological networks', with effects on designated biodiversity assets referring only to avoiding adverse effects. Natural England advised that the Sustainability Appraisal ascertains how restoration and enhancement of designated sites/assets and wider ecological networks is secured through the plan, in line with the NPPF. And that with regards to net gain, stated that it is unclear how an informed appraisal can be made when assessing the plan's 'promotion of net gain where possible'. These comments do not appear to have been addressed in the Regulation 19 draft.
5. The problem is that the Plan does not present any strategy or policy in relation to biodiversity. HDC has done the bare minimum in terms of anticipating and preparing for the new, and forthcoming, requirements of the UK Environment Act 2021, namely in respect of biodiversity net gain, and nature recovery. The Council should be taking a much more proactive and anticipatory approach, in line with other LPAs, particularly given the LGA guidance² advising LPAs to prepare for action in the near future and giving examples of how some are already treating nature recovery as a corporate priority, securing funding and delivering projects.

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

² https://www.local.gov.uk/sites/default/files/documents/PAS%20Biodiversity%20Net%20Gain%20and%20Nature%20Recovery%20update%20for%20members_1%20Nov%202022.pdf

6. Instead HDC's Green Infrastructure Strategy 2024 contains no strategy and is based on an inadequate underlying review of assets. The lists of assets and opportunities are short, high level and incomplete, and are the result of a desktop exercise carried out in 2014 apparently with no input from ecologists or consultation with conservation groups or local naturalists or communities (NPPF **179b**).
 - a. The main aim seems to have been to produce a map of assets, but without accompanying lists or descriptions of SSSIs, Local Wildlife Sites, ancient and protected woodland, or rivers. Or of the ecological or recreational assets which cross boundaries and require coordination with neighbouring authorities (NPPF **174**).
 - b. The strategy is non-existent. The Why is explained at some length. But there's almost nothing about the What and the How – no objectives, goals or plans for the Council, and no reference to how delivery might be resourced or funded. In fact, the Plan and Evidence Base overall suggest a lack of preparation and ambition around the delivery of nature recovery, or net gain.
 - c. There is no consideration of cross-boundary cooperation with Crawley, Mole Valley or Mid Sussex LPAs.
7. The Local Plan focusses heavily on habitats and sites in scope of the Habitats Regulations Assessment, ie SPAs, SACs and RAMSARs. The problem is that there are almost certainly other areas of habitat of equal or greater importance which are so far undetected due to a lack of survey work, and under-recording in general.
8. HDC fails to provide any ecological data in the Evidence Base to support the Plan. There are no adequate up-to-date surveys for any of the sites allocated. Detailed surveys and assessments of significance should be considered, and made public, prior to consideration of any site as a potential allocation in the Plan. And as a part of the Plan process, detailed surveys should be used to assess whether 12% BNG is achievable on site
9. Since HDC has no strategy or policy in respect of nature recovery networks (NRNs), it cannot comply with NPPF **179 FN 62**: 'where NRNs are identified ...it may be appropriate to specify the types of development that may be suitable within them'
10. The Plan acknowledges the need to deliver biodiversity net gain but it's not at all clear that HDC has the resources to ensure developers comply and that 30 year plans are enforced. The scale of development in the Plan and the extent of irreplaceable habitat and protected species at risk should mean that HDC is prioritising the need to correctly assess biodiversity loss and gain, not least by planning now for the necessary skills and resources.
11. **The Local Plan is deemed unsound** due to the failure to acknowledge the ecological value of the north of Horsham District and Ruspur Parish in particular. Amendments to the Plan are proposed. Lack of cooperation with Mole Valley DC is a serious omission given the Mole rises in the north of the District, and the resulting landscape and habitat is typical Low Weald rich with ancient woodland and hedgerows. Similarly, the lack of acknowledgement of the importance of the Green Infrastructure along the Horsham – Crawley boundary for both Crawley and Ruspur residents is a serious failure. The relatively high population density in Crawley means these areas are heavily used for recreation. Ifield Court Farm with its surrounding countryside and Kilnwood Lane – both in Horsham District – are Crawley's only remaining rural fringe and should be protected in the same way that Chesworth Farm is protected for Horsham residents.

We also note that the Plan overall contains no policy on minimising the habitat loss and disruption during construction.

New information made public since the Reg 19 consultation.

We note the new report on the **Bechstein's bat population** in the West of Ifield area and surrounds (by Ramboll, published³ in June 2024 as an annex to the draft EIA) based on more recent survey findings, and suggesting possible mitigations. This raises the question of whether the Core Sustainance Zones for this Bechstein's bat colony should be shown on the Policies map in the same way that CSZs are for colonies in the Mens (also see map of CSZ across Ruspur on page 49 of our Reg 19 response Green Infrastructure and Biodiversity). This could be considered a main modification.

³ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=7587307BB0C6420D9B1ECA776ECBC151

We also note that the Horsham ecologist suggested that the site has potential to meet published selection criteria for Special Area of Conservation (SAC) designation (in their response to HE's 2024 draft EIA, and that this is something the Applicant will need to consider. Does HDC also need to consider what steps it will take to protect and enhance the colony and its surrounding habitat?

a) Does "Green Infrastructure" mean "Green and Blue Infrastructure"? Are main modifications needed to address this?

Yes, and we note that HDC has already proposed this as a main modification.

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

Yes. Since it's highly likely that baseline levels of biodiversity and habitat value will be significantly under-estimated, and loss will be greater than anticipated, an uplift from the mandatory 10% BNG should partly help to offset these effects.

c) Are the requirements for off-site biodiversity net gain justified?

Yes. Aside from the mandatory requirements such as a "...funded maintenance and management plan, including monitoring / reporting and appropriate enforcement processes, that secures the biodiversity net gains for at least 30 years", HDC's desire to retain BNG within the District is positive. We would like to see more about encouraging BNG on-site and on neighbouring wildlife sites, including where that neighbouring site might be within a different authority. Plan paras 6.40 onwards.

Question 6. Is Policy 18: Local Green Space sound?

a) Is the first sentence of the policy effective?

No. It's vague and ambiguous, both in terms of what is meant by "local green and open space" and what is meant by "protected" in this context, particularly given the next sentence talks about circumstances in which protection (safeguarding) for designated LGS's falls away.

The phrase "local green and open space" applies to much of the land allocated for housing development.

b) Is it clear how this policy will be applied? Does the policy have any implications for Local Green Space which is close to a development proposal?

HDC Plan Policy 18 says: *1. Areas designated as Local Green Space, as identified on the Policies Map, will be safeguarded from development unless it can be demonstrated that:*

a) Development is proposed to enhance Local Green Space functions, for example through improvements to access, recreation and wildlife; or

b) It is required for a statutory utility infrastructure purpose, for example water, gas, electricity or telecommunications provision.

It's not clear how Policy 18 will be applied in the case of Ifield Brook Meadows, a designated LGS and LWS, which is shown on the Policies Map, but sits in Crawley Borough. It runs immediately alongside the proposed development West of Ifield for around 1.3km. **It's not completely clear that Ifield Brook Meadows is in scope for Policy 18, geographically.**

Although criterion 4a for Policy HA2 does state "the Ifield Brook Meadows Local Wildlife Site and Local Greenspace is conserved and enhanced, ensuring an appropriate buffer". As long as "conserved and enhanced" is equivalent or better than "safeguarded" as used in Policy 18, then no modifications are needed.

We note **Crawley BC's Reg 19 response** to Policy 18, requesting a main modification: "3. strategic development should not adversely impact, and should enhance, any Local Green Space it is adjacent to."

The CBC response (page 9) explains:

“Part of the value of the Ifield Brook Meadows and Rusper Road Playing Fields is the tranquillity and access to the Sussex countryside beyond that the wider setting offers – including the historic rural setting of the Ifield Village Conservation Area and the Sussex countryside beyond Ifield Brook. Strategic development would significantly and negatively impact on this setting and the experience of the Local Green Space. Therefore, having regard to the impacts and importance of the values of the area in design, building layouts and heights, landscaping, buffer zones and linkages through, from the administrative boundary on the Horsham district side would be essential. In addition, it would be essential that strategic development would not rely on urbanised access through the Local Green Space, harming the natural character of the area.”

This raises the issue of a potential tension within criterion 1a of Policy 18. 1a states that enhancement of LGS functions, such as improvements to access, recreation and wildlife, can mitigate for development. But a significant increase in access can seriously degrade habitats and biodiversity. For example, in the case of the West of Ifield, there has been a proposal to criss-cross Ifield Brook Meadows with cycle paths and footpaths to provide easy access from the houses to Ifield station and shops. This would degrade the recreational and wildlife functions and the natural character of the area.

As explained in the **SWOI Reg 19 response** to Policy HA2 covering Green Infrastructure and Biodiversity (page 24), the Meadows will be sandwiched between the most densely built part of the proposed development West of Ifield and the urban edge of Crawley (see our Map 1).

Our Reg 19 response also sets out the likely negative impact on Ifield Brook Meadows, both as an LGS and LWS, which can be summarised as:

- i. Ifield Brook Meadows currently form Crawley’s only remaining rural fringe, are designated as a Local Green Space and are enjoyed by many walkers and naturalists, as well as protecting the character and views to and from the Ifield Village Conservation Area and Grade 1 St Margaret’s church.
- ii. Evidence from three reports is presented to support the case that Ifield Brook Meadows are highly valued by local residents.
 - First, Crawley Borough Council has designated the area as a Local Green Space – the only one in the borough. The following extract explains why – from the Draft Crawley Borough Local Plan 2024 – 2040, May 2023⁴.

14.48 Public consultations have consistently shown that Ifield Brook Meadows and Rusper Road Playing Fields should be protected because of their special value to the local community. The Meadows are an important site of nature conservation with distinctive vegetation and wildlife. The northern part of the Meadows is of historic importance, forming part of the Ifield Village Conservation Area, contributing to the setting of the village and church. These elements make this area unique and local in character.
 - The second report is from the Crawley Local Plan Review Evidence Base and suggests that Ifield Brook Meadows is very important in terms of offering residents ‘Accessible Nature’⁵, ie ‘*where greenspace or semi-natural habitats give health and well-being benefits to people through regular access for walking, cycling or jogging*’.
 - Third, in its 2018 report of its Landscape Management Plan for the LWS, RSK reported⁶:

‘In early 2014, a good turnout of local people picked up their spades to plant 360 hedge plants as part of the restoration of an overmature hedgerow. They continued into the first phase of hedgerow coppicing and the creation of dead hedges.

⁴ <https://crawley.gov.uk/sites/default/files/2023-05/1.%20Submission%20Crawley%20Borough%20Local%20Plan%202024-2040%20May%202023.pdf>

⁵ Eco-serv GIS report - Joint Horsham District and Crawley Borough, 2019, (see Accessible Nature Demand on page 18) <https://crawley.gov.uk/sites/default/files/2023-08/Eco-serv%20report%20-%20Joint%20Horsham%20District%20and%20Crawley%20Borough.pdf>.

⁶ RSK, 2018. Homes and Communities Agency: Landholding at Ifield, Crawley. ‘In 2012, the Homes and Communities Agency commissioned RSK to produce a landscape management plan for the SNCI to make recommendations to enhance the ecological value of the site and the public’s use and enjoyment’.

Winter 2015 saw the volunteers move onto a second hedgerow and the second phase of coppicing. As well as local residents, volunteers from the local Youth Rangers group were able to get involved'.

RSK also reported:

'Owing to the local sensitivity of the site, RSK liaised with a residents' group, Ifield Parish, Crawley Borough Council and Sussex Wildlife Trust to ensure local support and understanding of the proposals'.

Given the RSK work was commissioned by the HCA – Homes England's precursor – we feel it's disappointing that Homes England is ignoring this local sensitivity and is suggesting converting the site into a playground and park.