

**MATTER 1 - LEGAL AND  
PROCEDURAL  
REQUIREMENTS**

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**HORSHAM LOCAL  
PLAN EXAMINATION**

Horsham Golf and Fitness Village

Hearing Statement by Carter Jonas

On Behalf of Generator Group

November 2024

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**Date: November 2024**

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## 1.0 INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Generator Group, the owner of the Horsham Golf & Leisure site. Generator Group has engaged in the Local Plan process to date and has sought to identify its concerns with the legal compliance and soundness of the draft Local Plan from the outset.
- 1.2 Generator Group supports, in-principle, the Plan-led system. In order for a Plan-led system to function it requires Local Plans to be not only legally compliant and sound, but for them also to be deliverable, proportionate and based on clear evidence.
- 1.3 The National Planning Policy Framework ('NPPF' or 'the Framework') confirms that Plans will be sound if they are positively prepared, justified, effective and consistent with national policy. For the reasons identified in the representations, which we will expand on, the Plan accords with none of these requirements.
- 1.4 The site extends to 55.57 hectares and is currently home to Horsham Golf Club, with an 18-hole course, a 9-hole course, driving range, putting greens and short game area alongside a range other ancillary facilities including a cafe and gym. It lies adjacent to the Horsham Football Club and the access onto Worthing Road lies opposite the Horsham Park & Ride, recycling centre and petrol filling station.
- 1.5 An outline planning application for the development of the site for a Sports and Leisure Hub including the provision of communal facilities, nursery and up to 800 dwellings was refused planning permission on 14 May 2024. An appeal against the decision was recently lodged and the public inquiry is anticipated to be held in Q1 2025.
- 1.6 Generator Group has submitted duly made representations to each stage of the Local Plan production process. For clarity, this has included representations to:
  - The consultation on the Local Plan Review – Issues and Options – Employment, Tourism and Sustainable Rural Development in April 2018;
  - The consultation on the Site Selection Criteria in June 2019;
  - The Draft Local Plan (Reg 18), including the Interim Sustainability Appraisal for Strategic Sites and Growth Options and the Site Assessment Report, in February 2020; and
  - The Draft Local Plan (Reg 19) in March 2024.
- 1.7 This Hearing Statement expands on the issues identified within the representations regarding the Councils' failures in relation to the Sustainability Appraisal. It also identifies the failures of the site assessment process in relation to the Horsham Golf & Leisure site in relation to matters of procedural fairness.
- 1.8 It is not possible for these fundamental matters to be resolved and therefore the Plan is incapable of being taken forward to adoption.
- 1.9 In the event the Plan is taken forward, the effects of the decision for the local community would be intolerable and would have a serious deleterious effect on the social, economic and environmental future of Horsham. Whilst it would effectively result in a short-term Plan vacuum this can be remedied in the short-term through the production of a deliverable Plan that meets its identified needs, and addresses wider unmet needs, in a fair and proportionate manner.

## 2.0 MATTER 1 – LEGAL AND PROCEDURAL REQUIREMENTS

### Issue 1 – Whether the Council has complied with the duty to co-operate in the preparation of the Plan

#### Question 2. For each of these, who has the Council co-operated with during the preparation of the Plan, what form has this taken? What has been the outcome of this co-operation?

- 2.1 This is a matter for the Council to address. However, we note that the duty to cooperate, whilst not a duty to agree, does require the outputs to be effective and deliverable policies on strategic cross boundary matters. In the context of the wider outstanding objections to the spatial strategy, the housing target and approach to addressing local housing needs, the approach to addressing wider unmet housing needs and the major matter of water neutrality it is self-evident that what cooperation there has been has not been effective.
- 2.2 Fundamentally the outputs of the cooperation have failed to deliver any suitable solutions to the cross-boundary matters. It is insufficient to shrug shoulders on matters of cross boundary significance and solely seek to put a tick in the box of compliance. The Local Plan is not deliverable, and it fails to demonstrate that effective joint working has taken place to address these significant and impactful matters.

#### Question 4: How has the Council co-operated to establish and meet a housing need? How specifically have development constraints influenced that co-operation, particularly water neutrality?

- 2.3 The PPG clearly requires that councils should “*engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters*”. While it is recognised that the duty to cooperate is not a duty to agree, the PPG also states that co-operation “*should produce effective and deliverable policies on strategic cross boundary matters.*”
- 2.4 Whilst evidence has been presented that shows engagement between authorities, this engagement does not demonstrate effective cooperation to ensure that the housing needs of the area are met in full. For cooperation to be able to demonstrate it has been effective cooperation, positive outcomes addressing identified issues are required. As it currently stands significant levels of housing will continue to be unmet in the period up to 2040 drawing in to question the effectiveness of the cooperation.
- 2.5 The Northern West Sussex Housing Market Area Statement of Common Ground (**DC02**) clearly indicates a deteriorating situation regarding the unmet housing needs of Crawley, Horsham, and Mid Sussex, are projected to increase from a shortfall of 527 dwellings as anticipated 2018 to 8,947 dwellings by 2040. Alongside this, further unmet housing needs are anticipated from the broader West Sussex and Greater Brighton sub-region, which will impact affordability across the sub-region, and we consider these have been given insufficient consideration in the Council’s decision not to meet its own housing needs in full.
- 2.6 In the context of the new Standard Method within the emerging NPPF, the above housing shortfalls will only be exacerbated, with a significant 53% uplift in housing requirements for Horsham and the wider Housing Market Area. While transitional arrangements for the new NPPF are acknowledged, given the existing housing shortfalls and the severity of the impending crisis, we believe that the Council has not advanced sufficient effective and deliverable policies within the draft Local Plan.

- 2.7 Attention should be drawn to the disagreements among various neighbouring authorities regarding the Council's approach to addressing the wider housing area. Specifically, the Brighton and Hove City Council Statement of Common Ground (**DC07**) states:

*"2.6 ... It is thus HDC's position that should it be able to fully meet its own needs and assist with meeting unmet needs of other authorities, assistance would be prioritised to other HMAs as follows: 1. Northern West Sussex HMA 2. Coastal West Sussex HMA 3. Other adjacent and nearby HMAs*

*2.7 BHCC note the position of HDC but does not agree with the prioritisation set out above. BHCC's view is that, given the scale of unmet housing need in the Coastal West Sussex HMA and those of Brighton & Hove in particular, options to explore meeting unmet need within the Coastal West Sussex HMA should not be secondary or contingent upon the consideration and/or resolution of unmet housing needs elsewhere."*

- 2.8 The Arun District Council Statement of Common Ground (**DC16**) also states:

*"2.5 Whilst understanding that HDC is taking an environmentally constrained approach, **ADC takes the view that this gives rise to significant potential cross-boundary implications. It is considered that the Horsham District Local Plan should not regard water neutrality as an absolute constraint on housing supply, and that it should set out a commitment to deliver the identified housing need and contribution towards unmet need**, as originally evidenced in the earlier versions of the emerging plan."*

- 2.9 The above should be considered in light of our concerns regarding the lack of details about the Sussex North Offsetting Water Scheme (SNOWS). Specifically, there is insufficient information on the anticipated delivery date, the water credits to be provided, and the ongoing review mechanism to support future housing needs, which eventually raises doubts about the effectiveness and deliverability of such a joint policy approach in addressing this development constraint, as part of the Council's duty to cooperate process.

**Issue 2: Whether the Council has complied with other relevant procedural and legal requirements**

**Question 4: Does the SA assess all reasonable alternative spatial strategy options, levels of housing and employment need and options relating to other policies in the Plan? Where it is considered that there are no reasonable alternatives, relating to all policies in the Plan is this clearly explained**

- 2.10 The Sustainability Appraisal (SA) has adopted a supply-based approach, considering only sites the Council identified as suitable, available and achievable within the Site Assessment Report (SAR) (H11), without any non-implementation rate applied.
- 2.11 We are concerned that the current SA is not a needs-based approach that is calculated based on meeting Horsham’s housing need in full and addressing the unmet need in neighbouring. Of the 14 growth scenarios assessed, only one (Scenario 3c) is capable of meeting the LHN, but it has been discounted. As the Local Plan’s vision is to make Horsham a place for people to live and work, and paragraph 10.19 acknowledges the high cost of housing being a significant barrier to younger people and families, we do not consider that the SA has adequately explored other reasonable alternatives to address housing needs.
- 2.12 Although urban extension sites were assessed in 11 growth scenarios in the SA, Site SA754 (Horsham Golf & Fitness Club) was only considered in one scenario (Scenario 3c). Given its proximity to the top-order settlement at Southwater, there is no evidence within the SA to justify this omission, nor to demonstrate that all reasonable alternatives including SA754 have been explored as part of the scenario testing.

**Medium growth scenarios (Quantum of Growth Option 2)**

- **Scenarios 2a, 2b and 2c: medium growth new settlement plus settlement hierarchy (Total new homes: approximately 11,575)**

*These three scenarios accommodate a medium level of growth. They all include all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. The respective options include one new settlement - either North East of Henfield (Mayfield), Adversane or Buck Barn. Each respective scenario includes some additional growth from small site allocations in line with the settlement hierarchy. They comprise a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

*These scenarios represent the greatest degree of balance between Spatial Strategy Options 1, 3 and 4. At the Regulation 18 stage, three stand-alone new settlement proposals (i.e. entirely non-dependent on any existing settlement) were included in the nine strategic sites identified for further testing. These are respectively represented in these three options. In each of these scenarios, all of the strategic urban extensions would also come forward in order to maximise development that would have good potential to integrate into existing large and medium settlements. The additional small site allocation total reflects the settlement hierarchy.*

- **Scenario 2d: medium growth new settlement with east-west spread (Mayfield), Urban Extension West of Billingshurst, without Killwood Vale and expand medium settlements (Total new homes: approximately 10,795) (new scenario):**

*This scenario accommodates a medium level of growth. It tests an alternative combination of large new settlement and urban extension sites. Through this scenario the Killwood Vale site would not be allocated, hence a more limited level of development at Crawley and the larger urban extension site at Billingshurst would be included to increase the level of development at that settlement. Development would still broadly be in line with the development hierarchy with a substantial number of homes at Horsham town. It comprises a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

*This represents an alternative medium-growth strategy to Scenarios 2a to 2c, to ensure a range of alternative distributions are tested. It is distinct from other medium-growth alternatives insofar as it focuses more development in the mid-eastern and mid-western parts of the District, and reduces the amount of development in the northern parts. The additional small site allocation total reflects the settlement hierarchy.*

- **Scenario 2e: medium growth A24/A264 corridor focus (including the large scale site at Kingsfold) (Total new homes: approximately 11,275) (new scenario)**

*This scenario accommodates a medium level of growth. It includes large scale sites focussed along the A24/A264 corridor at Kingsfold, Horsham town, Buck Barn and towards Crawley. It also allows for some development at Billingshurst. It comprises a hybrid of Spatial Strategy Options 1, 3, 4 and 5 (existing settlement hierarchy strategy, new garden towns, new urban extensions and employment strategy).*

*This scenario provides the strongest focus of the medium-growth scenarios on economic drivers. There is particular focus on sites located in the heart of the Gatwick Diamond, i.e. in the northern part of the District close to north of Horsham business parks, and also along the A24. It also builds on growing employment opportunities at Billingshurst through allocation of the East of Billingshurst strategic site. The additional small site allocation total reflects the settlement hierarchy.*

- **Scenario 2f: medium growth with east central focus - two new settlements, smaller Crawley expansion and all reasonable alternative small sites (including Killwood Vale) (Total new homes: approximately 10,800) (new scenario)**

*This scenario accommodates a medium level of growth. It includes two of the three new settlement options, only the Killwood Vale site towards Crawley and a relatively high number of homes at small sites. It comprises a hybrid of Spatial Strategy Options 2, 3 and 4 (proportionate growth strategy, new garden towns and new urban extensions).*

*This scenario provides a distinct medium-growth alternative to a strategy focused on new settlements on the one hand, and a strategy focused on extensions to existing settlements on the other. The main rationale is that much growth in the District over recent years (and ongoing until the end of the adopted HDPP period) has focused on the northern part of the District, especially Horsham Town. Allocation of two new settlements in the middle and eastern parts of the District respectively can be seen as balancing this via an alternative distribution. It necessitates a high level of growth from smaller sites at settlements within the settlement hierarchy to ensure delivery of a medium level of housing growth overall.*

- **Scenario 2g: medium growth urban extension and small sites option (Total new homes: approximately 11,875)**

*This scenario accommodates a medium level of growth. It includes all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. It also includes new settlements or 'satellite' settlements (i.e. are close to but not directly connected to the host settlement). There is a high amount of small settlement growth allowed for which provides growth across a number of other settlements within the settlement hierarchy. It comprises a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

*This scenario is distinct from the other medium-growth scenarios as it does not allocate any new settlement which is entirely stand-alone from other existing settlements. To achieve medium growth, this necessitates allocating all urban extension strategic sites. It also necessitates allocating the sites that are physically separate from, but close to, existing settlements - namely land east of Kingsfold and land west of Billingshurst. The additional small site allocation total reflects the settlement hierarchy.*

Higher growth scenarios (Quantum of Growth Options 3, 4 and 5)	
<p>■ <b>Scenario 3a: higher growth urban extension and new settlements (Total new homes: approximately 14,295)</b></p> <p><i>This scenario accommodates a high level of growth. It includes all three of the new settlement proposals, and all the major settlement extensions. It does not require any allocations of smaller sites, i.e., 100% of growth is from sites of at least 350 homes. It comprises a hybrid of Spatial Strategy Options 3 and 4 (new garden towns and new urban extensions).</i></p> <p><i>This scenario delivers a high level of housing growth. It allocates all available strategic sites, including all urban extensions, new settlements and 'satellite settlements', but not including the Ashington cluster which is not a strategic site apart from for purposes of the SA. Given this approach delivers a high level of growth, it is not necessary (or appropriate) to deliver any further small sites in or around the District's settlements.</i></p>	
<p>■ <b>Scenario 3b: higher growth urban extension and small sites (Total new homes: approximately 14,975)</b></p> <p><i>This scenario accommodates a high level of growth. It includes all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. It also includes new settlements or 'satellite' settlements (i.e. are close to but not directly connected to the host settlement). It does not include any new standalone settlements. It also relies on very significant delivery from small sites - well beyond the capacity of sites assessed as potentially suitable for allocation by officers but could theoretically be achieved by bringing back in sites submitted to the SHELAA that are currently considered Not Currently Developable. It comprises a hybrid of Spatial Strategy Options 2, 4 and 5 (proportionate growth, new urban extensions, and employment strategy).</i></p> <p><i>This scenario theoretically considers an approach whereby no new standalone settlements are allocated, rather a very high level of development is delivered on a large number of smaller sites across the District. It should be noted that this level of delivery from smaller sites would inevitably mean both significant growth around the edge of a number of settlements (including those with highly sensitive landscape settings) as well as a number of sites located relatively distant from existing settlements that form part of the settlement hierarchy (for example at secondary settlements). This approach may align to an employment-led distribution as it avoids new settlements and may provide opportunity for more smaller sites to be allocated around existing employment hubs.</i></p>	
<p>■ <b>Scenario 3c: Maximum growth, all available sites (i.e. all reasonable alternatives, strategic and small sites, the rejected Horsham Golf &amp; Fitness site plus 1,500 from other rejected sites (Total new homes: approximately 21,225) (new scenario)</b></p> <p><i>This scenario accommodates a maximum level of growth for the District, by taking forward all reasonable alternative sites considered including those rejected through the SHELAA process. It includes all large-scale settlement extensions and new standalone settlements. Similar to Scenario 3b, it also includes a very significant level of delivery from small sites - well beyond the capacity of sites assessed as potentially suitable for allocation by officers but could theoretically be achieved by bringing back in sites submitted to the SHELAA that are currently considered Not Currently Developable. It comprises a hybrid of Spatial Strategy Options 2, 3, 4 and 5 (proportionate growth, new garden towns, new urban extensions and employment</i></p>	

2.13 In addition, there is a disconnection between the Preferred Strategy and the proposed housing target. While the Preferred Strategy aims for 10,445 new homes, Strategic Policy 37 proposes a higher figure of 13,212 homes, aligning more with the discounted higher growth options. For the sake of clarity, it is our position that the principle for higher provision figures is supported (see further discussion in Generator Group’s **Matter 8 Hearing Statement**). However, with a higher housing requirement, there is no evidence that the SA has re-considered all promoted sites, especially those in sustainable locations to top-order settlements such as Site SA754, as reasonable alternatives.

2.14 Regarding the performance of all sites against the SA objectives, Table 4.3 of the SA states:

**Table 4.3 Summary of likely sustainability effects of the large site options considered for the Horsham Local Plan**

SA Objective	Urban extension or 'satellite settlement' sites										Standalone new settlement sites	
	SA101: West of Ifield	SA118: Land East of Billingshurst	SA119: West of Southwater	SA291: West of Kilnwood Vale	SA394: Rookwood	SA459/SA674/SA846: Land East of Kingsfold	SA744 (includes SA225)/SA668: West of Billingshurst	SA754: Horsham Golf & Fitness Club	SA085/SA520/SA524/SA539/SA790: Ashington cluster	SA414: Land North East of Henfield (Mayfield)	SA597: Adversane	SA716: Buck Barn
1: Housing	++	++	++?	+	++	++	++	++	+	++	++	++

2: Access to services /	++?	+/-?	++?	+/-?	++?	-/+?	++/-?	+/-?	+/-?	++/-?	++	++/-?
3: Inclusive	+?	+?	+?	0	+?	0	+/-?	0	+?	0	0	0
4: Crime	0?	0?	0?	0?	0?	0?	0?	0	0?	0?	0?	0?
5: Health and	++/-?	++/-?	++/-?	+/-?	++/-?	-/+?	++/-?	-/+?	+/-?	++/-?	++	++/-
6: Biodiversity	--?	--?	--?	--?	--?	-/+?	-/+?	-?	--?	--?	--?	-/+?
7: Landscape	--?	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	-?
8: Historic	--?	--?	--?	-?	-?	--?	--?	--?	--?	--?	--?	--?
9: Soil quality	-	--?	--?	--?	-	--?	--?	-	--?	--?	--?	--?
10: Mineral	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
11: Water	-?	-?	0	-?	0	0	-?	0	0	-?	0	0
12: Flooding	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
13: Transport	++/-?	++/-?	++/-?	++/-?	++/-?	+/-?	++/-?	++/-?	+/-?	-/+?	-	-/+?
14: Air pollution	++/-?	++/-?	++/-?	++/-?	++/-?	+/-?	++/-?	++/-?	-/+?	-/+?	+/-	-/+?
15: Climate	+/-	+/-?	+/-?	+/-?	+/-?	++/-?	+/-?	+/-?	+/-?	++/-?	++	++/-
16: Economic	++	++	++	+	+	++?	++	+	+?	++?	++	++?
17: Access to employment	++	+/-?	+/-?	+	++	+/-	+/-?	+/-?	+/-	-/+	+/-	+/-

2.15 Table 7.2 of the SA outlines the updated performance with consideration of significant changes to the scheme:

**Table 7.2 Updated Appraisal of the Large Strategic Sites that have seen a significant change**

SA Objective/ Site Name	1: Housing	2: Access to services and	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment
SA119: North-west of Southwater	++?	+?	+?	0?	++/-?	--?	-	--?	--?	--?	0	-?	+/-?	++/-?	+/-?	++	+/-?
SA754: Horsham Golf & Fitness Club	++	-?	0	0	-/+?	-?	--?	--?	-	--?	0	-?	+/-?	+/-?	+/-?	+	+/-?

2.16 The sites highlighted in blue above were incorporated in the Preferred Option, alongside the omission of 8 least sustainable sites. However, many of the selected sites actually perform worse against the sustainability objectives than omitted sites. In the instance of SA754, this only had significant negative scores against landscape, heritage and natural resources but positive or neutral scores for all others.

2.17 We are also concerned that there is no further update to the LUC Sustainability Appraisal (SA) since 2021, and the SAR since 2023. While paragraph 4.44 and Table 7.1 of the Sustainability Appraisal Update (SD03a) assess changes to larger sites, it is evident that only baseline effects are assessed (i.e. no mitigation or enhancement was considered). As such the SA fails to reflect ongoing discussions or proposed mitigation measures as being progressed for omitted sites, including SA754.

2.18 It is our position that the SA fails to reach an accurate and justified decision in relation to the performance of the omitted sites, including SA754. For example, the SAR erroneously concludes that the site is “separated from any existing established settlement”, despite its proximity to Southwater with good access to Horsham Park and Ride and frequent bus services to the wider area.

- 2.19 The sustainable benefits of developing Site SA754 including the delivery of a new local centre with communal facilities and a developer-led water neutrality solution, have been completely disregarded. Instead, the SAR subjectively states *“the scale of the development is not at a level where new infrastructure could be provided on-site to provide a range of services and facilities and therefore deliver a new community with a sense of place.”*
- 2.20 The SA also rated SA754 as ‘significantly negative’ for historic environment, citing *“possible heritage impacts on Denne Park, which is located to the north.”* However, this does not consider additional information from the outline planning application process and the fact that Council’s Conservation Officer has confirmed the proposed development would not affect the significance of these heritage assets.
- 2.21 SA754 is also scored ‘significantly negative’ for natural environment given a lack of information on biodiversity net gain. However, this ambiguity is brought in by the Council, as the Council has no regard to the fact that a Biodiversity Net Gain Report was submitted with the outline planning application, which confirms over 10% is deliverable on site and is supported by the Council’s Ecologists.
- 2.22 Further ambiguity arises regarding the benefits of the new sports and leisure facilities, which does not reflect the technical and design enhancements in the outline planning application. The case officer has confirmed in his delegated report that:

*“6.275 The proposed new sports and leisure facility, together with Horsham Football Club, would result in a new centre and dedicated areas for a multitude of sports as well as offering new homes for a sports charity, Horsham Hockey Club and the Golf College. This clearly would have benefits for the surrounding area, Horsham Town and the District as a whole and is also considered to be of significant weight in favour of the proposal.*

*6.276 Other benefits that the proposal offers including landscape enhancements, biodiversity net gain, pedestrian links to the existing PROW network, surface improvements to the existing PROW networks, SuDS systems, public open space, open space provision, a local centre, employment provision, community assets and play areas. These are judged as providing moderate weight in favour of the proposal.*

- 2.23 With regard to water neutrality, the SA has adopted a blanket assumption that all sites will address the issue in the same way, overlooking that the opportunity for mitigation will vary between sites. For SA754, the SA disregards the merit of the proposed developer-led water neutrality strategy that is based on borehole abstraction, without reliance on third party land or water resources, including the Sussex North Offsetting Water Scheme (SNOWS). This should have been afforded very substantial weight in the site selection process given that water neutrality issues constrain the Council’s ability to meet housing needs.
- 2.24 With the above in mind, it is our view that the Council has not taken an objective approach to the SAR and therefore the site selection process cannot be justified.

**Q5. Is the SA adequate and have the legal requirements of the 2004 Act and the Town and Country Planning (Local Planning) (England) Regulations 2012 (2012 Regulations) been met?**

- 2.25 We do not consider that the SA is sufficiently compliant with relevant legal requirements.
- 2.26 The PPG (Paragraph: 018 Reference ID: 11-018-20140306) details how sustainability appraisal should assess alternatives and identify likely significant effects:

*The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental,*

*economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:*

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). ...;*
- *as part of this, identify any likely significant adverse effects and **measures envisaged to prevent, reduce and, as fully as possible, offset them;***
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives. Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan- maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. **The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.** (our emphasis)*

- 2.27 Th PPG further states a site is suitable “*if it would provide an appropriate location for development when considered against relevant constraints and **their potential to be mitigated.**”*
- 2.28 As demonstrated above, despite proposed mitigations in the outline planning application, the Council has not conducted an iterative process within the SA and site selection process to ensure all reasonable alternatives have been duly considered, which led to an erroneous and misguided site selection process, making the plan unjustified and unsound.
- 2.29 Thus, we maintain that SA754 should have been considered suitable in the site selection process. Specific details as to how SA754 could come forward in a sensitive manor is provided within our Representations to the Regulation 19 consultation.

