



Project	Eastlands Farm (SA052, SA747 and SA791)
Document	Horsham District Council Local Plan 2023-2040 Matter 1 Hearing Statement obo Hunter Group

Matter 1, Issue 2 – Whether the Council has complied with other relevant procedural and legal requirements?

Sustainability Appraisal

Q3. How has the Sustainability Appraisal (SA) informed the preparation of the Plan at each stage?

We believe that the SA has been drafted to retro-fit a contrived spatial strategy which is wrongly based on the assertion that water neutrality represents an exceptional circumstance which justifies a reduced housing target. In our view, the SA was incorrectly used to re-assess the council's existing strategy, which was developed prior to water neutrality.

We do not therefore believe the SA adequately informed the latter stages of the plan, once water neutrality became a factor to contend with. There is no clear justification in the SA in respect of how the housing target for the plan was determined with no upper limit identified in the supporting evidence base to justify the significantly reduced annualised housing target.

We note that the subsequently produced Topic Paper 1: The Spatial Strategy (September 2024) (HDC02), seeks to provide further justification as to the council's reasoning for a reduced housing target. However, impacts of Brexit and Covid were already, at least in part, taken into account in the 2021 SA (SD03b) which supported delivery of 1,100 net additional homes per annum (dpa) over the plan period and at the time did not justify seeking a lower housing target on this basis; this only leaves the matter of water neutrality.

The council maintain that the reduced housing target of 777 (dpa) was informed by more recent (2022-2024) under delivery in the district, since receipt of Natural England's Position Statement in September 2021. However in our view, taking into account delivery between 2021 to early/ mid 2023, unrealistically skews the delivery rates overall and particularly in terms of what can be achieved with smaller sites in the early (years 0-5) part of the plan. The council have only recently been approving applications of scale with bespoke water neutrality solutions with no approvals of major development being made until they began to lose appeals on the matter in mid-2023.

It is also noted that the conclusion of the 2023 SA (SPD03a) is written to indicate the SA was written in response to changes made by the council and states *'This document updates the Policy and Site Appraisals previously undertaken by LUC in 2021 where changes to policies, large and small sites have taken place'* (our emphasis) and did not therefore inform said changes.

Q4. 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?

As set out in the conclusions of the 2023 SA (SPD03a), the document clearly states that it updates previous SA work, *'where changes to policies, large and small sites have taken place'*. We would question whether the SA therefore has truly informed these changes and adequately assessed suitable alternatives in terms of growth options and spatial strategy. Instead the SA only identifies reasonable alternatives in terms of the water efficiency policy together with some minor changes to small site options.



ECE Planning

In our view, the SA should inform the most appropriate strategy taking account of water neutrality, not just assess the pre-existing 2021 plan strategy. In doing so, we believe that the option of a greater number of smaller sites, in line with the development hierarchy should be considered where they are of a scale that could address water neutrality on a bespoke basis, without the need for Sussex North Offsetting Water Scheme (SNOWS). This strategy would be supported through further engagement with site promoters to secure evidence to demonstrate they could achieve water neutral development which could then be taken into account with certainty to accord with the Habitats Regulations 2017 and 'in combination' impacts. No such engagement has been undertaken and instead the housing targets have been contrived, within the same development strategy, under the assertion that exceptional circumstances have been demonstrated regarding the matter which should be dealt with as a constraint where mitigation can be delivered.