



Sussex
Wildlife Trust

Contact: Tor Lawrence

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Date: 27 April 21

By email only

Sent to all HDC Councillors

cc. Catherine Howe, Head of Strategic Planning

Dear Councillor,

The Sussex Wildlife Trust (SWT) acknowledges the pressure Horsham District Council (HDC) is under in regards to development. We understand that the Horsham District Planning Framework is now considered out of date and there is a level of urgency in reviewing the plan. However, we are concerned that this rush to get a new plan adopted will result in a difficult and prolonged Examination process that ultimately hinders progress towards nature's recovery in the District.

In SWT's response to the Regulation 18 Draft Plan last year (attached), we made it clear that the environmental evidence base for the plan was not sufficient. We advised that the plan should not go forward to the submission stage without further public consultation, once an improved evidence base was in place.

The Wilder Horsham District project has enabled an improved evidence base through its work on the identification of a Nature Recovery Network. However, SWT is unclear if this has been used to inform the new plan.

The strength of HDC's environmental evidence base is vital, not least to demonstrate the 'constraints' to development within the District. The Government's recent response to the consultation on changes to the current planning system¹ made a clear statement:

"Many respondents to the consultation were concerned that the 'targets' provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made... It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints."

At a time of ecological and climate emergency, the recent Dasgupta Review² about the economics of biodiversity shows that investing in our natural world now will secure the prosperity of future generations. This Review, driven by the Treasury demonstrates however, to secure this investment

¹ [Government response to the local housing need proposals in "Changes to the current planning system" - GOV.UK](https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review)

² <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

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for the long-term, we need to stop degrading what we have and protect land where nature can recover.

SWT call on HDC to be bold in their decision making process and consider the strength of its evidence base in helping to determine the level of development that the District's natural capital can absorb. The decisions made in this Local Plan Review will have permanent and irreversible local impact, and will be of relevance to all Local Planning Authorities in the South East trying to defend their natural assets and the services these provide. Creating a plan with an unachievably high housing target will only cause further degradation of biodiversity and the allocation of sites in unsustainable locations.

We urge HDC to recognise and fulfil the requirements of the NPPF in relation to environmental evidence and ensure that it is use this to inform the draft plan. HDC should consult again on a draft plan through the Regulation 18 process, before proceeding to the submission stage (Regulation 19).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tor Lawrence', with a stylized flourish at the end.

Tor Lawrence
Chief Executive
Sussex Wildlife Trust