



Horsham
District
Council

Horsham District Local Plan Examination

Matters, Issues and Questions

Matter 4: Conserving and Enhancing the Natural Environment

Issue 2

Date: November 2024

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Issue: 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 1: Is Strategic Policy 13: The Natural Environment and Landscape Character sound?

1. The Council considers the policy to be:

- **Positively Prepared:** The NPPF sets out the importance of the natural environment and landscape and this is therefore a key consideration in the delivery of sustainable development. The policy is positively worded, and enables development to come forward providing that proposals take account of the landscape and natural environment. The policy helps to ensure development takes account of and responds to the natural environment and landscape in accordance with **paragraphs 8 and 20 of the NPPF**.
- **Justified:** This policy is informed by the **Green Infrastructure Strategy (EN03), Landscape Character Assessment and Maps (EN05), Horsham Biodiversity Net Gain Assessment (EN06), Landscape Capacity Study and maps (EN08)**, in particular, as well as constraints information relating to protected landscapes, sites of biodiversity importance and so on. Together, these identify key constraints and landscape and natural environment matters which should be taken into account when considering development proposals.
- **Effective:** Policy 13, criterion 2 makes reference to the Local and National Nature Recovery networks. **The Duty to Cooperate Statement (SD12)** and the **Council's response to Matter 1, Issue 1** provide an overview to the effective joint working on cross-boundary strategic matters that has been undertaken. Horsham District Council is a 'Supporting Authority', in accordance with the Local Nature Recovery Strategy (LNRS) legislation¹, to West Sussex County Council which is the 'Responsible Authority' for the preparation of the Local Nature Recovery Strategy for West Sussex. All the West Sussex planning authorities meet monthly in respect of this and also the introduction and ongoing operation of biodiversity net gain. This joint cross boundary working has helped to inform the development of this policy.
- **Consistent with National Policy:** The policy will assist in achieving sustainable development and complies with objectives and policies within the **NPPF**, including **paragraphs 8, 20, 130, 153, 155, Section 15 (paras 174 to 188)** in particular, which together require that development take account of the natural environment.

Q1.a) Are the words "inappropriate development" in the opening paragraph effective?]

2. The words "inappropriate development" has been and continues to be a widely used planning term and is considered to be effective and in accordance with **paragraph 35 of the NPPF**. The NPPF uses the term in respect of residential gardens, the Green Belt, areas at risk of flooding, and coastal change (**paragraphs 71, 147, 151, 159 and 171 of the NPPF**). It is not considered the NPPF seeks to apply the term exclusively to these areas. However its use demonstrates it is a widely recognised

¹ <https://www.legislation.gov.uk/ukxi/2023/341/made>

and used planning term. Indeed, the NPPF does not include it in the Glossary, nor states it is a term to be restricted to any particular area.

3. The opening sentence including the term “inappropriate development” is identical to the current adopted policy (**Policy 25 of the Horsham District Planning Framework, 2015 (HDC05)**). The policy criteria 1-4 set out the expectations that development proposals will need, which are to be real alongside any other policies relevant to a proposal. Schemes that do not meet these would be considered to be ‘inappropriate development’.

Q1.b) Is “where practicable” in criterion 2 consistent with national policy?

4. The term “where practicable” is considered to be consistent with national policy. It can add clarity, in accordance with **paragraph 16 of the NPPF**, that there will be times when an identified need and deficiency cannot practicably be addressed by a particular development. Where such needs and deficiencies can be addressed then the development should do so. The NPPF uses the word “practicable” in respect of minerals as well as the terms “where practical” and “as far as is practical” (**paragraphs 210 and 211 of the NPPF**). The tests of soundness seek to ensure wider needs are met where it is practical to do so (**paragraph 35.a of the NPPF**).
5. The current adopted policy, **Policy 25 of the Horsham District Planning Framework (HDC05)**, includes a similar criterion which just relates to the Green Infrastructure Network and does not include the term “where practicable”.
6. During the preparation of the Local Plan both biodiversity net gain and Local Nature Recovery Strategies have become requirements by virtue of the Environment Act 2021 and secondary legislation, and greater information and guidance is available on the legal expectations and requirements for development. In light of these requirements it is considered the inclusion of the term ‘where practicable’ unduly weakens the regard to be given to the green infrastructure network and nature recovery networks and does not appropriately reflect the importance to be given to them in accordance with the Environment Act 2021 and secondary legislation. The deletion of the term “where practicable” is therefore proposed by the Council and forms suggested **main modification HM019 (SD14)**.
7. The deletion of the term will help to ensure appropriate regard is given to habitat creation, including the provision of appropriate stepping-stones and corridors to facilitate connectivity. Where biodiversity net gain is required, this helps to direct provision, particularly when unable to provide on-site, to locations within the Local Nature Recovery Strategy and the national Nature Recovery Network in accordance with **Planning Practice Guidance: Natural Environment (Ref ID: 8-012-20190721 and 8-021-20240214)**.

Question 2: Is Strategic Policy 14: Countryside Protection sound?

8. The Council considers the policy to be:
 - **Positively Prepared:** The NPPF sets out the importance of the natural environment and landscape and this is therefore a key consideration in the delivery of sustainable development. In accordance with the spatial strategy (as discussed in more detail in response to **Matter 2 Issues 1-3**), which identifies that new development should be focussed in and around existing

settlements, this policy sets out how development proposals within the countryside will be considered. The policy supports development that is consistent with retaining the character and undeveloped nature of the rural parts of the District, and is therefore considered to be positively prepared.

- **Justified:** This policy is also a continuation of Policy 26 – Countryside Protection, in the current **Horsham District Planning Framework (HDC05)**. This has been an effective means of ensuring the rural character of the District has been maintained whilst enabling development to come forward in villages and towns, and on development plan allocations. **Built-up Area Boundary Review (EN01) and Secondary Settlement Review (EN02)** and the settlement allocation policies (**HA2 to HA21**) which identify suitable locations for built development, and ensure that this policy approach remains fit for purpose. In particular (and as described in more detail in the response to **Matter 2, Issues 1-3**), Secondary Settlements have been designated to enable some more limited development in rural settlements that are currently classified as ‘countryside’.
- **Effective:** This policy has been informed by feedback from other organisations. In particular it requires that objectives of the High Weald AONB Management Plan, and the dark skies of the South Downs National Park are taken into account when considering proposals in these areas.
- **Consistent with National Policy:** The policy will assist in achieving sustainable development and complies with objectives and policies within the NPPF, including **paragraphs 78, 79, 79, 80, 84, 85, 89, 105, 120, 130, 153, 155, Section 15 (particularly paragraphs 174 and 185)**. The policy also recognises that these areas may be suitable of minerals extraction (**section 17 of the NPPF**), albeit that this is primarily a West Sussex County Council function.

[Q2.a\) Should this policy make reference to its geographical application on the Policies Map?](#)

9. The policy makes clear it relates to areas outside built-up area boundaries and secondary settlements. **Paragraph 1.6 of the Plan (SD01)** makes clear that no policy is to be read in isolation and **Strategic Policy 2: Development Hierarchy** of the **Plan (SD01)** makes clear the built-up area and secondary settlement boundaries are defined on the **Policies Map (SD02)**. The policies map also shows the location of neighbourhood plan allocations, and the proposed allocations in this Plan. It is as a consequence of these boundaries that the countryside area arises rather than a defined countryside boundary in itself. To ensure ‘readability’ **Policies Map (SD02)** shows relevant policy designations and allocations, including the built-up area boundaries and secondary settlements (as too many layers become too difficult to decipher). However, the interactive Policies Map provides information on relevant policies when different locations are selected, and areas within the countryside and impacted by this policy are highlighted when clicked. It is not considered further amendments are necessary.

Question 3: Is Strategic Policy 15: Settlement Coalescence sound?

10. **Positively Prepared and consistent with the NPPF:** The **NPPF (paragraphs 20 and 174)** is clear that planning policies should contribute to and enhance the natural and local environment and should recognize the intrinsic character and beauty of the countryside. This policy contributes to the overall strategy for the pattern, scale and design quality of places and makes sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure. In line with **paragraph 130** of the **NPPF**, this policy seeks to ensure that development is sympathetic to local character and history and establishes or maintains a strong sense of place.

11. **Justified and effective:** This policy is also a continuation of **Policy 27 – Settlement Coalescence**, in the current **Horsham District Planning Framework (HDC05)**. This has been an effective means of ensuring the rural character of the District has been maintained by providing a mechanism to ensure that urbanising feature (e.g. along roads between settlements) do not erode the settlement pattern or sense of place. This policy draws upon **Landscape Character Assessment and Maps (EN05)**, and seeks to ensure that development is appropriate to its location, taking into account the potential sensitivity of a site or the wider area to impacts that could arise from the development.

[Q3.a\) Does this policy apply to the whole District or just specific locations within it? Does it have geographical application which should be identified on the submission Policies Map?](#)

12. **Paragraph 6.27** of the **Plan (SD01)** makes it clear that the policy applies to all settlements within the District, and that it seeks to retain their unique identity and safeguard the undeveloped nature of the landscape between each of the towns and villages.
13. The policy applies to development proposals located within the countryside, which is land located outside of defined built-up area boundaries and secondary settlement boundaries, both of which are depicted on the submission **Policies Map (SD02)**. The use of this policy is dependent on the detail of the proposal and the character and setting of the settlement(s) of which it relates.
14. It is therefore considered that the depiction of defined boundaries is sufficient and no further updates to the submission **Policies Map (SD02)** in relation to **Strategic Policy 15** are required. However, for the purpose of clarification it is proposed that a modification (**SM18**) is made to **paragraph 6.27** of the supporting text as set out in the **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**.

[Q3.b\) Is it clear what is meant by “developing” between settlements”?](#)

15. Criterion 1 states that development between settlements will be resisted unless it can be demonstrated that the proposal meets all of the set criteria. For the purpose of the **Plan (SD01)** the meaning of “development” is that as outlined in **Section 55 of the Town and Country Planning Act 1990**.
16. The supportive text of Strategic Policy 15 (paragraph’s 6.26 and 6.27) provides an explanation as to why the policy is required. In this case, there is a need to limit the urbanising impacts of development and retain the rural landscape that is interspersed between the settlements so that they can keep their separate identities and maintain the sense of leaving one place and arriving at another.
17. Examples of factors which lead to a sense of coalescence are provided within paragraph 6.26, and a description of what elements the Council will consider are also detailed within paragraph 6.27. It is important that the supportive text and the policy wording are read alongside each other for a clear explanation of what is meant by “development between settlements”.

[Q3.c\) Is there any conflict between this policy and others in the Plan which allocate sites for development?](#)

18. **Paragraph 1.6** of the **Plan (SD01)** is clear that all policies within the **Plan (SD01)** relate to each other, and that the document should be read as a whole. **Strategic Policy 3: Settlement Expansion** of the **Plan (SD01)** makes clear expansion of existing settlements will be supported subject to specified

criteria which includes sites allocated in the Local Plan or a Neighbourhood Plan where they adjoin an existing settlement edge. The latter provides guidance to those undertaking Neighbourhood Planning.

19. As acknowledged within the supporting text of the policy (paragraph 6.27), it is recognised that there is a need to plan for housing growth and that this will impact on the settlements of the District. The purpose of Strategic Policy 15 is therefore to seek to ensure that further urbanisation, other than that already allocated within the Plan, can be resisted.

Question 4: Is Strategic Policy 16: Protected Landscapes sound and legally compliant?

20. **Paragraphs 11 (including footnote 7), 72 (including footnote 36), 20, 130, 153, 155, Section 15, particularly paragraphs 176 and 177, of the NPPF** set out the importance of protected landscapes. This policy therefore sets out the approach to ensuring that development proposals take account of these landscapes, but is positively prepared as it helps ensure small scale development that supports social and economic development is compatible with the purpose of the AONB. It is therefore considered to be **positively prepared** and **consistent with national policy**. The policy is a strategic policy and Horsham District Council considers it to be soundly based, consistent with national policy, and appropriate for the protection to be afforded to the High Weald Area of Outstanding Natural Beauty (AONB, a National Landscape) and the setting of the South Downs National Park. This policy is a continuation of the approach in **Policy 30: Protected Landscapes** in the current **Horsham District Planning Framework (HDC05)**, which has proven effective in ensuring that protected landscapes continue to be protected and has taken account of the work of the High Weald Area of Outstanding Natural Beauty Unit and feedback from the South Downs National Park Authority. The policy is therefore considered to be **justified** and **effective**.
21. **Section 245 of the Levelling Up and Regeneration Act (LURA) 2023** require that all relevant bodies (which includes Horsham District Council) seek to further the purposes of National Parks. Paragraph 4 of the policy as drafted reflects the previous legal wording in relation to National Parks ('to have regard to the purposes'). It is therefore requested that the Inspector consider the main modification **HM021** that has been proposed in **HDC Schedule of Suggested Modifications (SD14)** to ensure that this consistency with the new legal framework is maintained.

Q4.a) Should this policy make reference to its geographical application on the Policies Map?

22. The policy makes clear it relates to the High Weald AONB and the setting of the South Downs National Park. The defining of the boundaries of these landscape designations is undertaken under separate legislation and not via the development plan making process. The **Policies Map (SD02)** shows the designated area of the AONB and the interactive Policies Map provides information on relevant policies when locations are clicked, including this policy in relation to sites within the High Weald AONB. The setting of the High Weald AONB and South Downs National Park do not have a defined boundary and it could be misleading to indicate a zone for the setting because it will depend on various factors such as the height, mass, scale of development and the sight lines from the National Park / AONB.

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

23. The **NPPF** sets out the importance of the natural environment and landscape and this is therefore a key consideration in the delivery of sustainable development, with a number of key requirements set

out in **Chapter 15 - particularly paragraphs 179**, which requires the mapping, identification and safeguarding of key habitats. The policy is positively worded, and enables development to come forward providing that development takes account of green infrastructure and biodiversity. It is therefore considered to be **positively prepared** and **consistent with national policy**.

24. This policy is informed by the **Green Infrastructure Strategy (EN03)**, **Landscape Character Assessment and Maps (EN05)**, **Horsham Biodiversity Net Gain Assessment (EN06)**, **Landscape Capacity Study and maps (EN08)**, in particular, as well as constraints information relating to protected landscapes, sites of biodiversity importance and so on. Together, these identify key constraints and landscape and natural environment matters which should be taken into account when considering development proposals, and is considered to be **justified**. Horsham District Council is a 'Supporting Authority', in accordance with the Local Nature Recovery Strategy (LNRS) legislation², to West Sussex County Council which is the 'Responsible Authority' for the preparation of the Local Nature Recovery Strategy for West Sussex. All the West Sussex planning authorities meet monthly in respect of the LNRS and also the introduction and ongoing operation of biodiversity net gain. This joint cross boundary working has helped to inform the development of this policy to ensure that it is **effective**.

[Q5.a\) Does "Green Infrastructure" mean "Green and Blue Infrastructure"? Are main modifications needed to address this?](#)

25. In the supporting text **paragraph 6.33** to **Strategic Policy 17: Green Infrastructure and Biodiversity** and in the **Glossary**, it is made clear that "Green Infrastructure" is a term used to describe a multi-functional and connected network of green spaces, that includes water and other natural features. However, in recognition that not all users of the local plan will be technical experts in areas such as flooding and green infrastructure, it is considered that it would be beneficial for absolute clarity, to make reference to 'blue' infrastructure. A number of modifications to the policy have been suggested to ensure this distinction is clear, as set out in proposed modification **HM024** in the **Schedule of Suggested Modifications (SD14)**.

[Q5.b\) Is the requirement for relevant development proposals to deliver at least a 12% net gain justified and effective?](#)

26. **Paragraphs 8, 32, 174, 179, 180 of the NPPF** seek net gains in biodiversity and the last two make clear this should be measurable net gains. The NPPF does not set biodiversity net gain thresholds. Planning Practice Guidance (PPG) on Biodiversity Net Gain makes clear the statutory framework objective is for development to deliver at least a 10% increase in biodiversity value, it does not preclude the setting of a higher target if there is justification to do so. (**PPG: Ref ID:74-001-20240214 and Ref ID: 74-006-20240214**). The **NPPF (para 15)** is also clear that the planning system should be plan led, and that plans should provide a framework for economic, social and environmental priorities. **NPPF para 16b** also states that plans should be '*prepared positively, in a way that is aspirational but deliverable*.' (HDC emphasis).

² <https://www.legislation.gov.uk/ukxi/2023/341/made>

27. 10% forms the legal minimum which was set by the Environment Act because this is the lowest level that DEFRA considered would be the absolute minimum necessary to ensure confidence that net biodiversity gains would actually be delivered (ie 110% of pre-development biodiversity value). It was also considered that any gain would actually be realised as an outcome of a development-related biodiversity 'enhancement' project. Any policy requirement above would be subject to normal policy considerations and a decision makers judgement over other material considerations. Strategic Policy 17 would follow the same approach established through the statutory biodiversity net gain approach and is not introducing different technical approaches.
28. As set out at the start of **Chapter 6 of the Plan (SD01)** the District currently offers a high-quality environment, the majority of which is agricultural/rural that is varied in nature. In June 2023, the Council declared a climate and ecological emergency as set out in **paragraph 2.16 of the Plan (SD01)**. The Horsham District **Council Plan 2023 – 2027 (SS01)** sets out the District's shared vision. One of its four key themes is to inspire greener futures with an aim to be a net zero council by 2030 and a net zero district by 2050. It aims to ensure the District is held in high regard for best practice in rewilding and regenerative farming. This matter is therefore a key Council objective.
29. **Paragraph 6.5 of the Plan (SD01)** makes clear that only 8% of the land in the district is covered by a designation as of importance for nature conservation despite much of the land supporting a number of protected species. Areas outside nature conservation designations are still important to the overall character of the District and wildlife. In view that little of the District is covered by nature conservation designations, there is much less to protect the biodiversity of this rural District compared with other local planning authority areas which has historically led to a high level of development pressure which in turn increases the risks to biodiversity. The Office for National Statistics (ONS) states in its publication titled 'How life has changed in Horsham' (January 2023)³ that the District saw an 11.8% increase in population between 2011 and 2021. This is significantly greater than that of the overall population increase of the South East (7.5%) and of England (6.6%) and illustrates the high development pressures on the District compared to the region and Country as a whole. Furthermore, development pressures in Horsham and surrounding Districts have contributed to the adverse impacts on the Arun Valley, leading to the publication of the **Natural England Position Statement (CC08)**.
30. It is therefore considered Horsham District has unique circumstances that justify the setting of a higher biodiversity net gain (BNG) threshold. A proportionate evidence base has been produced which has informed the development of the policy:
- The **Sustainability Appraisal Update December 2023 (SD03a)** considers and evaluates the increase to 12% BNG to be a significant sustainability change and to have a significant positive effect on **SA objective 6 (Table 7.6 and paragraphs 7.24, 7.25, 8.14 10.18)**.
 - The **Open Space, Sports & Recreation Review, June 2021 (I04)** clearly shows in **Table 5 in the executive summary and Part 9** significant shortfalls in natural & semi-natural space within virtually all parishes.
 - The **Horsham Biodiversity Net Gain Assessment (EN06)** makes clear that based on its site assessment work that the majority of sites would be able to provide 12% net gain on site, and that

³ <https://www.ons.gov.uk/visualisations/censusareachanges/E07000227/>

most of the sites that cannot would be able to with a small change to the developable area. **EN06** shows through its green call for sites findings that, should off-site provision be required, there is more than enough land in the District available to meet this need.

- 12% BNG was used in the whole **Local Plan Viability Assessment (H12)** and was assessed to be viable. The extra 2% BNG has been shown to be negligible in terms of development footprint in the **Horsham Biodiversity Net Gain Assessment (EN06)**, however, it is considered to be significant in terms of the added benefit to biodiversity, and where delivered can also have a positive effect on the value of a development. Annex 3 of the Defra impact assessment (2019)⁴ also notes that the majority of the costs associated with net gain are incurred to correct for the initial loss of biodiversity through development (i.e, achieving only 'no net loss'). Biodiversity gains represent a relatively small proportion of overall habitat creation/enhancement requirements. This means the additional investment required to move from 10% net gain to 12% does not mean expenses increase by 20%, they would be much more negligible.

31. It is considered relevant to note that both Kent and Surrey County Councils, with their respective Wildlife Trusts, are advocating 20% Biodiversity Net Gain. Guildford, Maidstone and Worthing have adopted planning policies setting 20% Biodiversity Net Gain. Many other authorities are seeking a minimum of 20% Biodiversity Net Gain including two adjacent authorities: Mole Valley to the north and Mid Sussex to the east. In addition to this the South Downs National Park lies to the south where its designation introduces a purpose "to conserve and enhance the natural beauty, wildlife and cultural heritage of the area".

[Q5.c\) Is criterion 7 effective?](#)

32. This criterion is considered appropriate, necessary and effective. It provides clarity that biodiversity is to be considered by all applicants, which is consistent with the NPPF which seeks net gains in biodiversity (**paragraphs 8, 174.d, 179.b, and 180.d of the NPPF**, the latter two seek measurable net gains). The criterion helps to enable development management to negotiate improvements or minimise the loss of important garden habitats such as ponds, native hedges etc. Similar to the reasons for the introduction of the mandatory 10% Biodiversity Net Gain, it is felt the no net loss approach has not been successful at achieving no loss in biodiversity to date.
33. Implementation would depend on fact and degree and in many instances could be covered by a sentence in support of a planning application. For example, for a small extension to a dwelling where a bird box or similar could be incorporated or a change of use where native species could be planted.

[Q5.d\) Is criterion 8 consistent with national policy and legislation?](#)

34. It is considered criterion 8 is consistent with national policy and legislation but that this should be improved upon by providing greater clarity and appropriate strengthening of the protection to be given

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf

to species taking into account the overarching biodiversity objectives of the Environment Act 2021 and its secondary legislation.

35. Natural England put forward a suggested amendment to this criterion in response to the Regulation 19 consultation (#1216944)⁵. Their amendment sought to make clear in the first sentence regard should also be given to priority species and to include reference to protected and notable species in the second sentence.
36. **Paragraph 179 of the NPPF** makes clear habitats and biodiversity, including species, are to be protected and enhanced. It is clear planning must consider the potential impacts on protected and priority species in paragraph 16 of PPG: Natural Environment and paragraph 19 of the PPG makes clear significant harm to wildlife species in general should be avoided (**Ref ID: 8-016-20190721 and 8-19-20240214**)
37. Horsham District Council, in alignment with Natural England's suggested amendment, is therefore proposing modification **HM025** in the **HDC Schedule of Suggested Modifications to the Regulation 19 Local Plan (SD14)**.

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

38. Paragraphs 101 to 103 enable the identification of Local Green Space (LGS) in Local and Neighbourhood Plans. Whilst the Plan (SD01) does not allocate any Local Green Spaces, the policy recognises that some designations have been made in existing Neighbourhood Plans, and that Parishes reviewing or updating plans may wish to consider designation of such sites. This policy seeks to provide a consistent approach to this process over the plan period, together with the consideration of any proposals on these sites. This approach is therefore considered to be **positively prepared, justified, effective** and **consistent with national policy**.

[Q6.a\) Is the first sentence of the policy effective?](#)

39. Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area and must meet the tests as prescribed in **paragraph 102 of the NPPF**. Local Green Space is a specific designation and does not include all 'open space'. The first sentence of Policy 18 erroneously expands the LGS designation so that it reads as though it seeks to protect both Local Green Space and open space.
40. For the purpose of clarification, it is considered the first sentence should be deleted and that proposed modification (**SM19** in **Suggested Modifications to the Regulation 19 Local Plan: Response to MIQs November 2024**) to Policy 18 should be introduced so that Policy 18 falls in line with national policy and clarifies it does not confer protection over all open space.

5

https://strategicplanning.horsham.gov.uk/Regulation_19_Local_Plan/showUserAnswers?qid=9331459&voteID=1216944

Q6.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?

41. The primary purpose of Strategic Policy 18: Local Green Space sets a consistent approach to how any development proposals on that land will be considered together with a framework to guide the identification and delivery of any future Local Green Space in Horsham District in Neighbourhood Plans. Sites that are identified in Neighbourhood Plans have been and will continue to be assessed through the Examination of those respective plans to it is consistent with the principles of sustainable development, and the delivery of homes, jobs or other services.
42. It is recognised that Ifield Brook Meadows Local Wildlife Site and Local Greenspace, which is located within Crawley Borough adjoins the allocation **HA2: Land West of Ifield**. Paragraph 4a) of that policy sets out how the impacts on this site should be considered. It is therefore not considered that any further duplication is required in this policy.