

Report to Cabinet

11 December 2023

By the Cabinet Member for Planning and Infrastructure

KEY DECISION REQUIRED



**Horsham
District
Council**

Not Exempt

Horsham District Local Plan 2023 - 2040: Regulation 19 Consultation

Executive Summary

It is a legal requirement that Horsham District Council prepare a Local Plan. A draft plan has therefore been prepared which sets out the proposed strategy for considering development proposals in the District for the period 2023 to 2040. This report sets out further detail on the Local Plan preparation process. It seeks agreement that the document be agreed as Council policy and be published for a formal period of comment in accordance with the relevant planning regulations, before being submitted to the Planning Inspectorate for an independent examination of the Plan.

Recommendations

It is recommended that the Cabinet agree to recommend to Council that it:

- i) Approves for publication the Horsham District Local Plan Regulation 19 document together with the Sustainability Appraisal, Habitats Regulation Assessment and Policies Map and other supporting evidence base documents for a 6 week period of representation from Friday 19 January 2024 to Friday 1 March 2024.
- ii) Approves the submission of the Horsham District Local Plan Regulation 19 document to the Secretary of State for Levelling Up, Housing and Communities (the Planning Inspectorate) for examination, following the six week representation period, together with Regulation 19 representations submitted to the Council and the necessary background evidence.
- iii) Delegates authority to the Director of Place in consultation with the Cabinet Member for Planning and Infrastructure to prepare a Proposed Modifications Schedule for the Plan with proposed changes that may be required to address soundness representations received during the aforementioned representation period.
- iv) Notes that the final Local Plan will be brought back to full Council for formal adoption following the independent examination undertaken by the secretary of state.

Reasons for Recommendations

- i) The recommendations are required to ensure that the Council meets the statutory requirement to carry out a Local Plan review, and to meet the requirements in the Town and County Planning (Local Planning) England Regulations 2012.
- ii) It is both legally necessary and appropriate to invite public and stakeholder participation in the preparation of a new Local Plan for Horsham District. Part of the statutory process is to allow representations to be made on the Local Plan before it is submitted to the Secretary of State.
- iii) To enable the Local Plan to progress to independent examination and accord with government requirements to have an up-to-date Local Plan.

Background Papers

Local Plan Issues and Options – Employment, Tourism and Sustainable Development, April 2018 and summary of representations:

<https://www.horsham.gov.uk/planning/local-plan/local-plan-review-issues-and-options>

Horsham District Local Plan 2019-36 Public Consultation (Regulation 18)

Horsham District Local Plan Regulation 18 Consultations –2020 (Website links) and summary of comments received:

<https://www.horsham.gov.uk/planning/local-plan/regulation-18-consultation>

Horsham District Council Statement of Community Involvement:

<https://www.horsham.gov.uk/planning/planning-policy/statement-of-community-involvement>

Local Plan Evidence Base:

<https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>

Water Neutrality:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/position-statement>

Wards affected: All

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Background Information

1 Introduction and Background

- 1.1 All Local Planning Authorities are required to produce a Local Plan to ensure the economic, housing, social and environmental needs for the District are met. Local Plans must be reviewed at least once every five years to ensure they are kept up-to-date in accordance with the National Planning Framework (NPPF) and supporting guidance. The Council is therefore in the process of undertaking a review of the current Local Plan (known as the Horsham District Planning Framework).
- 1.2 The new Local Plan must meet a number of challenges, including delivering new development that provides homes and jobs for local communities, whilst protecting and enhancing the local environment which has been identified as being under threat.
- 1.3 This Council commenced the Local Plan review process in 2018, with an Issues and Options consultation held between 6 April 2018 and 25 May 2018. This consultation focussed on the future economic strategy, together with sustainable rural development and tourism issues. In addition, a call for development sites was held during 2018 with an updated Strategic Housing and Economic Land Availability Assessment (SHELAA) published in 2019. This consultation was followed by a further Issues and Options consultation, known as the Horsham District Local Plan Regulation 18 consultation, which was held between 17 February 2020 and 30 March 2020.
- 1.4 A Draft Regulation 19 Local Plan was considered at a Cabinet Meeting of 15 July 2021. The consideration of this plan at the Council meeting in July was postponed due to the publication of the NPPF which required the Council to consider the strategy in light of requirements for a 30-year vision. The preparation of the Regulation 19 documentation was further delayed by the receipt of a Position Statement from Natural England which requires that new development does not generate additional adverse impact on the protected habitats of the Arun Valley.
- 1.5 In December 2022, the government published a consultation on a number of proposed changes to the NPPF. A decision was made to delay the consideration of the Regulation 19 document to enable the Council to take account of any revisions to this document. The revised NPPF was not published as anticipated in the spring / summer of 2023. Following the local elections in May 2023, the decision was therefore made to continue plan preparation, particularly in light of the forthcoming changes to Local Plan making which have now been enacted via the Levelling Up and Regeneration Act 2023.
- 1.6 The preparation of the Horsham District Local Plan Regulation 19 document has taken account of the outcome of the Issues and Options consultations, and other

more informal forms of consultation such as Parish Council workshops. In addition, a number of updates have been made to the Council's evidence base since 2020. This work has informed the content of the draft Regulation 19 Local Plan, which includes sites proposed for allocation for housing development. Section 3 of this report sets out more detail on the content of the plan and the supporting evidence base.

2 Relevant Council policy

2.1 The Horsham District Council Plan provides a focus for the Council's activities and sets out clear priorities for the Council in the period to 2027. There are four broad themes:

1. **Supporting people and communities:** Our District is a great place to live and everyone deserves to benefit. We'll provide help in tough times and build communities where people can flourish and have fun.
2. **Inspiring greener futures:** We aim to be a net zero Council by 2030 and a net zero district by 2050. Horsham District will be held in high regard for best practice in rewilding, regenerative farming and recycling.
3. **Building a thriving local economy:** Our District will be known as an easy place to do business. We'll work to overcome challenges and keep our high streets thriving, both in Horsham town and across the District.
4. **Always listening learning and improving:** We're stronger when we work together. That means more sharing and more community involvement. Local democracy has to mean more than just an election every 4 years.

The Council Plan influences all areas of the Council's work. In relation the Local Plan, it provides a clear direction when setting the future planning objectives for this area. This includes ensuring that the community and environment is put at the heart of the Council's activities, including as part of the development of the Local Plan. Delivery of the Local Plan is set out as the first objective under the priority 'Inspiring Greener Futures'.

2.2 In June 2023, the Council declared a climate and ecological emergency, the agreed wording of which is set out below. This provides a steer for the Council to ensure that we actively contribute to achieving a net zero carbon target through our activities, and also seek to ensure that its activities seek to address the biodiversity crisis.

"This Council declares a Climate and Ecological Emergency, based on the International Panel on Climate Change's AR6 Synthesis Report of March 2023 which states that humanity is in the midst of a crisis entirely of its own making. This crisis has already resulted in a global surface temperature rise of 1.1°C, affecting many weather and climate extremes in every region across the globe, leading to widespread adverse impacts and related losses, including damage to nature and people.

We welcome the recent statement on the climate emergency and biodiversity crisis from our new council leader that “taking real action to combat these will not only be an immediate priority but will also be an ever-present consideration in all that we do throughout this term and beyond”.

“In response to this rallying call, this Council accepts the inadequacy of the climate related motion it passed in June 2019 and, leading by example, will significantly increase the rate of carbon reduction associated with its own corporate plan to achieve carbon neutrality for its direct emissions by 2030 and indirect emissions by 2050.”

3 Details

The Horsham District Local Plan 2023- 2040

- 3.1 The draft Horsham District Local Plan 2023 -2040 Regulation 19 document is attached to this report at Appendix 1. Appendix 2 provides a summary of the key changes made to this document since it was considered at Cabinet in July 2021. In light of the significant environmental constraints that the District is facing, the documentation has been restructured since 2021 to ensure that these matters form a key focus of the District’s strategy. The document is structured as follows:

Chapter 1: Introduction

- 3.2 This chapter introduces the Horsham District Local Plan Regulation 19 document. It contains the proposed dates and details regarding the formal ‘period of representation’.

Chapter 2: Planning Context

- 3.3 This section of the document sets out the context in which the Local Plan has been prepared. This includes reference to the National Planning Policy Framework (NPPF) which sets out a number of key requirements which Local Plans must meet and has been the starting point for the preparation of this plan. The chapter also introduces the concept of Water Neutrality which has been a key influence on the preparation of this plan. The chapter also covers the geographic context for the District. Finally, the chapter also covers the Council’s own Council Plan priorities and the local context of Neighbourhood Plans.

Chapter 3: Spatial Vision and Objectives

- 3.4 This section provides more detail about Horsham District and the challenges that it is facing. This is used to set the vision for the District including the clear environmental and community focus of the plan. This is followed by a series of

objectives to help deliver the vision. The key chapters of the plan which cover each objective are signposted within this section.

Chapter 4: Policies for Growth and Change

- 3.5 This chapter sets out the overarching strategy to meet the development needs of the district. This includes the identification of a settlement hierarchy which seeks to direct development to the locations with the most services and facilities in the first instance. Where it is necessary to identify land for development outside existing settlement boundaries, this chapter sets out the overall approach and criteria by which this will be considered.

Chapter 5: Climate Change and Water

- 3.6 The need to mitigate and adapt to climate change is a key objective of this plan. This chapter sets out that the Council's expectation is that new development is designed to be net zero carbon in construction and operation in order to maximise delivery of net zero development over the lifetime of the plan. It includes policies to ensure that development proposals contribute to achieving net zero carbon emissions by 2050 at the latest. The policies also require that development is adapted to future changes in the climate. These policies are enhanced criteria when compared with the current HDPF. They seek to ensure that developers consider and provide low carbon energy sources as part of their developments, use of sustainable construction methods including low emissions and on-site renewables. In addition, the plan outlines that it is a longer-term priority of the Council to continue to update its planning policies to speed up the delivery of net zero carbon development. It is therefore considered that the Plan meets the Council's legal obligations as required by the Climate Change Act 2008.
- 3.7 The Natural England Position Statement published on 14 September 2021 set out that there is evidence that the abstraction of water near Pulborough is having an adverse impact on the protected nature conservation sites in the Arun Valley. In order to comply with the requirements of the Conservation of Habitats and Species Regulations 2017, the Local Plan must demonstrate that any new development will not exacerbate the current situation. To achieve this, development in the Local Plan must be water neutral – in other words, new development must not increase the rate of water abstraction above current levels. Since September 2021 the affected Local Authorities have worked together to develop a Water Offsetting Strategy which has been endorsed by Natural England as follows:

“Natural England’s endorsement of Sussex North Water Neutrality Study: Part C – Mitigation Strategy, Final Report, 23 November 2022

Natural England endorses the mitigation strategy described in the above report. Natural England has previously advised the relevant Local Planning Authorities (LPAs) that development in the area served by the Pulborough abstraction must not

add to potential adverse impact on habitat at Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area (SPA), Arun Valley Special Area of Conservation (SAC) and Arun Valley Ramsar site by requiring increased abstraction. As described within the report, one way in which this can be achieved is by making development within the impacted area water neutral, the definition of this term is laid out below:

“For every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development.”

The proposals put forward by the mitigation strategy are: reducing water demand through defined water efficiency requirements for new development, water company demand management delivery and an LPA-led offsetting scheme.

If properly implemented, these proposals can provide sufficient certainty that those developments which would potentially place additional demands on existing water use in the area served by the Pulborough abstraction, collectively identified in the respective Local Plans, will be water neutral and will therefore not add to the potential adverse effects on the habitats of the Arun Valley in this respect, either alone or in combination.”

To deliver water neutrality, the local plan therefore contains a policy which requires that new development is highly water efficient, and that the additional increase in water demand is offset. A mechanism for this will be provided through a local authority led offsetting implementation scheme (OIS). Significant progress has been made on the offsetting scheme over the past year. The scheme is now referred to as ‘Sussex North Offsetting Water Strategy or ‘SNOWS’.

- 3.8 Local Plan policies also require that development which takes place is not at risk from flooding now and in the future, taking account of the increased risk from flooding as a result of climate change.

Chapter 6: Conserving and Enhancing the Natural Environment

- 3.9 Horsham District has a highly valued natural environment. As evidenced by the issue of water neutrality, this environment is under threat. Horsham District when compared with much of the South East has relatively few ‘absolute’ constraints (in terms of geographical area) such as nationally designated landscapes, nature conservation designations (e.g. Sites of Special Scientific Interest) or land at risk from river flooding. Land outside these designations nevertheless provides critical ecological services and are highly valued by local communities. Without the protection of a designation (or water neutrality) this means these areas come under more pressure for change and development than many other local authority areas with more absolute designations.

- 3.10 The policies in this chapter recognise the pressure for development which the District is facing, and seeks to ensure that the environment is protected and enhanced as far as is possible. In addition, where development does occur it must do so in a way which respects the local environment and brings forward environmental enhancements. The Plan seeks to combat the biodiversity crisis by ensuring that all development contributes to nature recovery, taking account of strategic initiatives such as the Local Nature Recovery Strategy and the Weald to Waves Network. In addition, evidence gathered by the Council indicates that there is potential in the District to deliver a greater percentage of biodiversity net gain than the 10% that is required in the Environment Act 2021. The policies therefore set a minimum 12% biodiversity net gain target. This is an increase in the level of biodiversity net gain compared with the level recommended to Cabinet in July 2021.

Chapter 7: Development Quality, Design and Heritage

- 3.11 Horsham District has a rich cultural history and much of the built environment of the District is very historic in nature. This has a key role to play in attracting people to live, work and visit the area. The local plan policies require that new development is designed in such a way to ensure that development enhances and complements local character, landscape and open spaces, and ensure that environmental mitigation is incorporated into development. The design policy also seeks to ensure that development is designed to take account of cyclists and active travel which in turn will help improve people's health and wellbeing. This chapter sets out policies to ensure that the historic environment is protected and enhanced and ensure that new development which takes place delivers attractive, vibrant and functional communities with a distinctive sense of place.

Chapter 8: Infrastructure, Transport and Healthy Communities

- 3.12 This chapter seeks to ensure that new development which takes place meets the needs of the new communities and provides community services and facilities, including provision for education, health care, sports facilities and open space. In terms of transport, there is an expectation that streets must be designed around people and not vehicles. By designing development better, it will be possible to encourage more non-car based transport including walking and cycling. It is however recognised that some journeys will continue to be made by car, and the policies require that the necessary upgrades to the transport network are provided. There is a requirement that electric vehicle (EV) charging points are provided for as standard for every new dwelling.

Chapter 9: Economic Development

- 3.13 This section of the Local Plan contains policies which will protect and enhance the economy. Key business areas already in the District will be protected for commercial use, and the strategy seeks to enable businesses in urban and rural

parts of the district to grow and expand. This includes the identification of additional land to provide new employment floorspace. It is anticipated this will allow many existing businesses to remain located in the District and help provide jobs that are close to where people live.

- 3.14 This chapter also recognises that the economic health of the District is wider than providing office space and industrial spaces. This chapter also includes policies on Tourism and retail.

Chapter 10: Housing

- 3.15 In recent years, the Government has made it clear that there is an expectation that local plans deliver a step change in housing delivery. Paragraph 11 of the NPPF states that

“Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 3.16 When considering the level of housing growth to include in the Local Plan, the starting point is the Government’s ‘Standard Housing Methodology’ for calculating housing needs. At the current time, this figure is 911 homes per year.
- 3.17 The water neutrality evidence base identifies that opportunities for water offsetting in North West Sussex are constrained in the short to medium term, until an alternative water supply can be provided. In addition, a consequence of the requirement for new development to be water neutral has been to very significantly limit the amount of development granted planning permission since September 2021. This has arisen as, in the absence of a strategic solution, proposals have not been able to demonstrate water neutrality with sufficient certainty to meet the Conservation of Habitats and Species Regulations 2017 requirements. Under normal circumstances these permissions would contribute to the Council’s supply of sites that would normally build out in the early years of the plan.
- 3.18 Taking account of the Council’s limited supply of sites, together with the identified lack of water supply it has been concluded that the Council cannot at the current time meet the Standard Housing Methodology target of 911 homes a year without adversely affecting the protected Arun Valley habitats. This would be in contravention of paragraph 11 of the NPPF as set out in paragraph 3.15.

- 3.19 The housing target set out in the local plan is therefore set at 777 homes per year. To take account of the limited amount of water that can be offset in the early years of the plan, together with the restriction in the number of sites which can build out in the very early years of the plan it is proposed that there will be a 'stepped trajectory' with a housing target of some 480 homes per year in the first five years of the plan, rising to 901 homes per year for the remaining 12 years. Future Local Plan reviews will need to consider the extent to which progress has been made towards establishing alternative water supplies, or other relevant changes in circumstances and consider the impact this has on future housing delivery targets.
- 3.20 In order to meet the housing target set out in the Local Plan, it is necessary to allocate land across the district for housing development. The document therefore sets out a number of draft housing allocations which is based on the settlement hierarchy outlined in Chapter 4 of the Plan. This focusses highest levels of development closest to the most sustainable settlements, including Horsham, Southwater and Billingshurst as far as this is possible. Land adjoining Crawley is also identified as an area for growth taking account of the key function of this settlement at the heart of the Gatwick Diamond economic and housing market areas, together with this District's ability to help provide for identified infrastructure needs of the town including education.
- 3.21 Smaller allocations equating to around 1,830 homes are identified in a number of other villages and towns in the District to help support community services and facilities and allow these smaller settlements to remain thriving communities. This takes account of land which has been identified by communities as part of their neighbourhood plans (which generally cover the period to 2031), but also to reflect the additional housing requirements in the period to 2040. Policy 37 of the draft Local Plan identifies how it is proposed that the housing targets for the Local Plan will be met. This includes the following new strategic housing allocations:
- *Land West of Ifield, Crawley:* 3,000 homes of which 1,600 will be delivered in the period to 2039.
 - *Land West of Southwater:* 1000 homes of which 735 homes will be delivered in the period to 2039. The 735 homes to be delivered in the plan period comprises the allocation of 450 homes made in the Southwater Neighbourhood Plan (up to 2031), with a further 285 homes to meet additional housing needs in the period to 2040.
 - *Land East of Billingshurst:* 650 homes
- 3.22 The policy also identifies other means by which housing will be delivered in the plan period. This includes land which already has planning permission but has yet to be built out (including Neighbourhood Plan allocations) and windfall development. In addition, it is considered that there is capacity for a further 500 homes within the

existing Land North of Horsham allocation during the lifetime of the build-out of this site, and where the principle of development has been established.

- 3.23 This chapter sets out the detailed housing allocation policies. The policies cover both strategic and smaller site allocations. This includes a policy which sets out the general development principles which it is expected that sites conform to, such as landscape led development and high-quality design. Each separate allocation then sets out additional site-specific criterion. Together these policies will ensure that the development which does come forward is of a high quality, and that (read together with other Local Plan policies) appropriate infrastructure improvements, including green infrastructure, are delivered alongside development.
- 3.24 In addition to the policy setting out how the Council will meet the Government's housing targets and requirements, this chapter also contains a range of policies which set out how the Council will ensure that the homes which are built are of a high standard and are a mix of sizes and types. A key concern raised by Local communities across the District is that homes which are built need to include a sufficient mix of sizes and types, including 2 to 3 bedroom homes for families and those who are downsizing. This is also backed up by the Council's evidence. The policy on housing mix therefore requires that overall, 85% of homes are either 1, 2 or 3 bedrooms in size.
- 3.25 In addition, local communities and the Council's evidence has also identified that there is a lack of housing which is easily accessible on the incomes of those living and working in the District. There is an expectation that new homes that are delivered within the plan period are affordable for local residents. The affordable housing policy sets out that strategic sites provide a minimum of 35% affordable housing, (40% at West of Ifield), and that smaller developments of over 10 units or exceeding 0.5 hectares deliver a minimum of 45% affordable units. Evidence also indicates that there would be a benefit to residents in need of affordable housing if this was delivered as social rented tenure. However at the current time, funding models mean that this would be very difficult to deliver in Horsham District as such development would not be financially viable. The policy therefore makes clear that the Council's preference is for the delivery of social rented homes in the first instance with an expectation that this is delivered where feasible to do so. In addition, the policy and supporting text of this chapter are supportive of other forms of lower cost and community led housing schemes such as Community Land Trusts.
- 3.26 This chapter also identifies how the Council will meet its identified Gypsy and Traveller needs. This is proposed to be met through strategic allocations, intensification of existing sites followed by the allocation of new sites, together with a criteria-based policy against which to consider other proposals which may be submitted to the Council.

Duty to Co-operate

- 3.27 Section 33A of the Planning and Compulsory Purchase Act 2004 places Local Planning Authorities under a legal duty to co-operate in relation to the planning of sustainable development. This means that such authorities must work together where there are matters that would have a significant impact on the areas of two or more authorities. Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their local plans are submitted for examination. A key area of co-operation has been the joint working between this authority, Crawley Borough Council, Chichester District Council, the South Downs National Park, West Sussex County Council, Southern Water, Natural England and the Environment Agency to develop a Water Offsetting Strategy to ensure that respective plans produced by each authority is water neutral. This co-operation will continue as the respective authorities work to develop the offsetting implementation scheme.
- 3.28 As part the Duty to Co-operate, it has also been necessary for this Council to seek to understand the extent to which neighbouring authorities can meet their own housing or other needs, and whether there is potential for these needs to be met as part of the Horsham District Local Plan.
- 3.29 As part of the Duty to Co-operate process that has been ongoing throughout the Local Plan preparation process to date five authorities have written to this Council to formally set out that they have unmet housing needs. These are Crawley Borough Council, Chichester District Council, Worthing Borough Council, Mole Valley District Council, Waverley Borough Council and Elmbridge Borough Council.
- 3.30 Prior to the receipt of the Position Statement from Natural England and the requirement for the local plan to demonstrate water neutrality, it was considered that the Local Plan had some potential for meeting unmet housing needs for other District's and boroughs, leading to a proposed housing target of some 1100 homes each year in the draft Local Plan which was considered at the Cabinet meeting on 15 July 2021. As set out in paragraph 3.17 and 3.18 the impact of water neutrality means that development above 777 homes cannot be evidenced to deliver water neutrality, and development would not meet the NPPF's requirements for sustainable development. It is however recognised that in the mid to longer term when the solutions to water neutrality become clearer there may be potential to reconsider the extent to which the District can meet unmet housing needs as part of a future Local Plan review.
- 3.31 In view of the need to continue to consider unmet housing needs in the future, the Local Plan continues to reflect the geographical relationship Horsham District has with the wider sub region. In terms of the economic and housing market, the closest relationship this District has is with North West Sussex, which also includes Crawley Borough Council. A proportion of the south-east of the District is also located in the coastal West Sussex and greater Brighton housing and economic market. This

District has very limited economic and housing links to the Surrey authorities. The plan notes that if able to do so in the future it will seek to prioritise meeting the unmet housing needs for Crawley, before those of the South coast and then Surrey.

- 3.32 Although unable to contribute to meeting Crawley's housing needs during this plan, it is considered that the District can play a role in meeting other unmet needs. In particular, Crawley Borough has an identified shortfall of secondary school places. The provision of land for a new secondary school within the Land West of Ifield allocation will provide for this requirement.

Policies Map

- 3.33 The production of a Policies Map is a specific requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. The map must be based on an Ordnance Survey map and illustrate geographically the application of policies in the adopted development plan. The Council already has an adopted Policies Map (which accompanies the Horsham District Planning Framework and Made Neighbourhood Plans). Copies of the revised policies maps are shown in Appendix 3. These include the new housing and employment allocations. If agreed for publication, the policies maps will be published as both an interactive map and in pdf format together with the Local Plan document and other supporting documentation.

Local Plan Evidence Base

- 3.34 It is a requirement of the NPPF that the preparation and review of Local Plan policies is underpinned by relevant, up-to-date and proportionate evidence. The following paragraphs outline key elements of the evidence base which have helped to inform the preparation of this plan. The evidence base prepared by the Council to date is available on the Council's website, and these documents will form part of the background documentation to support any agreed Regulation 19 consultation. <https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base>. A list of the main evidence base documents is appended as Appendix 4. It should be noted that the Council has undertaken an Equalities Impact Assessment of the plan which also forms part of the Local Plan evidence base. This is discussed in more detail in section 11 of this report.

Sustainability Appraisal and Strategic Environmental Assessment

- 3.35 Local Planning Authorities must carry out an appraisal of the sustainability of the proposals of the local plan and prepare a report of the findings. Accordingly, the preparation of the Horsham District Local Plan Regulation 19 documentation has taken account of the findings of the Sustainability Appraisal (incorporating Strategic Environmental Assessment). The Sustainability Appraisal report identifies the social, environmental and economic effects of the options and a range of different alternatives for the Council's development strategy. This includes a number of

different means of delivering the spatial strategy and alternative sites or combination of sites. The study has been updated to take account of the impacts of water neutrality. For example, there has been consideration of the impact of a policy setting a water efficiency standard of 85 litres per person per day, compared with the current requirement of 110 litres per person per day.

- 3.36 Overall the Sustainability Appraisal concluded that the Local Plan sets out a positive approach to achieving sustainable development which will contribute towards meeting the needs of the local community up to 2040 within the constraints of water neutrality. The Sustainability Appraisal identifies that many of the sites proposed for allocation are on greenfield sites which without mitigation has the potential to give rise to adverse environmental impacts. However, the policy safeguards that have been incorporated into the Local Plan will mean that the potential adverse effects that would otherwise arise can be mitigated. The document also identifies mechanisms as to how any impacts arising from the plan could be offset, reduced or mitigated particularly through the provision and wording of the various Local Plan policies. This has helped to ensure that the policies within the Local Plan are as sustainable as possible. A non-technical summary of the Sustainability Appraisal is attached to this report as Appendix 5.

Habitat Regulation Assessment

- 3.37 It is also a legislative requirement that the Council undertakes a Habitat Regulation Assessment (where there is a likely significant effect on a wildlife site located in the local planning authority's area or in its vicinity) in order to assess the impact of the proposed plan on sites of international importance for biodiversity, and in particular key sites designated a Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). An assessment of the proposed scale and location of development in the District has indicated that without mitigation there would be potential to harm these habitats – most notably the Arun Valley. Other potential impacts include the effect of increased traffic emissions leading to the degradation of protected woodlands as a result of declining air quality. Increased levels of development also have the potential to lead to the loss of habitat for the protected Barbastelle bat.
- 3.38 In response, a number of mitigation measures have been incorporated into the plan including a bat sustenance zone, policy mechanisms to ensure that appropriate bird surveys are undertaken and the potential provision of replacement habitat, if required. Already outlined within this report is the policy requirement to ensure that the plan is water neutral. Other policy provisions seek to limit as far as possible water use and abstraction arising from new development and minimise the reliance on cars which contribute to nitrogen dioxide emissions. These measures seek to ensure that the integrity of a number of nature conservation sites of international importance are not affected. A non-technical summary of the Habitat Regulation Assessment is attached this report as Appendix 6.

Site Assessment & Housing Delivery

- 3.39 In order to meet the future housing and employment needs of the District, it is necessary to allocate new land for development. In order to help identify land which is available for development, the Council held a 'call for sites' in 2018 where landowners and developers had an opportunity to promote land to the Council. There was a further opportunity to promote land to the Council as part of the Regulation 18 Local Plan consultation held in February and March 2020. In light of the NPPF requirement to consider a 30-year vision, key strategic site promoters were also invited to provide further details to the Council in this respect. New sites and updated evidence have also been put forward to the Council more informally throughout the Local Plan preparation process which has also been taken into account over the course of plan preparation. In total around 500 sites have been considered by the Council during the Local Plan preparation process.
- 3.40 All sites and along with any supporting information submitted to the Council, including proposed masterplans, economic, social and supporting environmental information has been considered against a set of criteria which have considered the suitability, availability and deliverability of sites for allocation in the Local Plan. This has taken account of the Council's own evidence base which has considered the extent to which the market can accommodate new development in the district over the local plan period.
- 3.41 The range of sites considered by the Council ranged from small sites of five or more up to significant strategic allocations of several thousands of homes. Taking account of the findings of the site assessment process, recommendations for allocations have been made for sites which meet the proposed settlement hierarchy and adjoin existing settlement boundaries. The site assessment process has also considered the potential for a number of larger strategic scale developments, including new settlements to help deliver housing to meet the required housing targets. Appendix 7 contains further detail on the conclusions of the site assessment process. The full documentation and evidence is available to view on the Council's local plan evidence base as set out in paragraph 3.34.

Transport

- 3.42 New development which takes place in the District will have an impact on the transport network. A detailed transport assessment of the local plan has been undertaken, to ensure that the cumulative impact of developments within and beyond the District on highways in and around the District has been considered. A summary of this assessment work is set out in Appendix 8. This has concluded that there are likely to be some significant impacts on the road network that arise directly from sites being allocated in the Local Plan. Notable impacts include delays or safety issues occurring at a number of junctions, however most of these impacts can be successfully mitigated through a combination of improving sustainable transport measures and re-prioritising the phasing of traffic lights. It will further be

necessary to address potential delays on the A23/A2300 southbound slip road onto the A23, which requires further discussion with Highways England. However, in all cases, the report identifies that there are realistic and achievable mitigation measures. In summary therefore the proposed strategy is not considered to have any 'showstoppers' and the impacts identified can be addressed.

Viability

- 3.43 It is a requirement of the NPPF that the policy requirements that are delivered from a development are viable. Without this, the delivery of development can be impacted. In addition, an Infrastructure Delivery Plan (IDP) has been prepared which will be published as part of the Regulation 19 evidence base. This document will set out the key infrastructure which is necessary to support the delivery of the local plan, including open space, education and transport.

The policies in the Local Plan, informed by the IDP has been subject to a viability assessment. This has included an assessment of the viability of a number of potential strategic sites. This has concluded that the plan policies and the proposed allocations can be delivered whilst also providing good quality development (including affordable housing) and infrastructure in a timely manner. A summary of the Viability Report is attached as Appendix 9.

Environmental Considerations

- 3.44 In order to ensure that the high-quality environment of the District is protected and enhanced as far as is possible, the development of the local plan has taken account of a range of environmental evidence. In addition to the SA/SEA process and the HRA process outlined above, this has included a wide range of other data including the a review and update of the Council's Green Infrastructure Strategy, the presence of Air Quality Management Areas in the District, and an update to the Council's Strategic Flood Risk Assessment and the Landscape Capacity of the District, together with an assessment of the extent to which the District can deliver enhanced levels of biodiversity net gain as a result of development. This includes consideration of the Nature Recovery Network for Horsham District, which identifies where opportunities for biodiversity enhancement and recovery exist.
- 3.45 In addition, new evidence has been prepared. This includes a Carbon Reduction Study to assist the Council in delivering its commitments to achieving net zero carbon and a Heritage Impact Assessment, which has considered the potential impact of new development on archaeological and historical assets within the District and sets out recommendations to ensure impacts can be mitigated.

Economic Considerations

- 3.46 The Council has carried out an Economic Growth Assessment (EGA) which sought to understand the amount and type of economic development which would be needed to support growth in Horsham District and contribute to the health of the wider Gatwick Diamond as a whole. A focussed update to this report has been carried out to take account of the impacts of the Covid-19 pandemic so far as is practicable in an uncertain economic climate. The findings of the EGA indicate that Horsham District is in a strong position to support economic and employment growth over the plan period despite the short to medium term challenges of the pandemic. The study demonstrates that there is a need to provide sites that meet modern business requirements and assist existing businesses in the District to expand and flourish thereby providing new local jobs, as well as providing some additional employment land to meet the needs arising from additional housing growth.

4 Next Steps

- 4.1 It is proposed that the Horsham District Local Plan Regulation 19 document is published for a six week 'period of representation' between Friday 19 January 2024 and Friday 1 March 2024 in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012.
- 4.2 A local planning authority must submit for examination a local plan that is 'sound'. The NPPF paragraph 35 sets out the tests of soundness against which a plan will be tested. These will test whether the plan is:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 4.3 It is considered these four tests have been met. As set out in section 3 of this report, the starting point for preparation of the plan has been the NPPF. Policies have therefore been drafted to ensure that they are consistent with national policy. The plan is also considered to be positively prepared as the plan takes a proactive

approach to meeting housing and other development needs whilst ensuring that key environmental limits are not exceeded. The plan preparation process has also considered a number of other alternative strategies and options, as part of the Sustainability Appraisal and Strategic Environmental Assessment process and the preparation of other evidence base documents, leading to the recommended strategy. This is considered to be justified. The plan preparation process has also been effective with consideration of strategic cross boundary issues (including, but not limited to water neutrality) which has been undertaken as part of our Duty to Co-operate discussions with a range of organisations. In December 2022, the Government published a consultation setting out proposed amendments to the NPPF. In addition, in October 2023, the Levelling Up and Regeneration Act (LURA) gained Royal Assent. This will ultimately bring in changes to the process of Plan Preparation in the future. The NPPF consultation and LURA is discussed in more detail in section 6.

- 4.4 The six week representation period will provide stakeholders and the general public with the opportunity to prepare and submit representations to the Council about the local plan. The Council must then consider these representations and can propose further changes to the local plan which should be further consulted on, and subject to, a sustainability appraisal prior to submission for examination. The start date of the 19 January 2024 has been selected to enable a period of time prior to the formal consultation where local communities and other stakeholders can begin to review the Local Plan documentation (Appendix 1) and evidence base on a more informal basis. This reflects feedback from local communities that sufficient time is required for them to programme in their own meetings to discuss and agree any representation that they wish to make on the plan.
- 4.5 The Horsham District Local Plan Regulation 19 document will be published online and hard copy documentation will be made available in local libraries. The main methods of submitting representations will be via the Council's online consultation link, but email and hardcopy responses can also be submitted.
- 4.6 The Council will ensure that the representation period is well publicised through a range of media including websites, local newspapers and a range of community publications, in accordance with the Council's Statement of Community Involvement. During the representation period, the Council will ensure there are opportunities for Parish and Neighbourhood Councils, stakeholders and businesses to learn more about the draft Local Plan and how to make comments as part of this process, including through Parish/Neighbourhood Council workshops, and social media. Where possible hard copy information panels will be made available in public libraries.
- 4.7 Representations that are made to the Council on the content of the Local Plan will, be formally submitted by the Council to the Planning Inspectorate, together with the Local Plan and supporting evidence.

- 4.8 It is good practice that the Council provide the Planning Inspectorate with its initial response to the issues identified during the Regulation 19 consultation. As part of this process, it is envisaged that it may be appropriate to provide the Inspectorate with a schedule of minor amendments to the plan (such as points of clarity or typographical errors) which the Council ask the Examining Inspector to consider as part of his or her examination of the plan. In the event that the Council consider that a more significant change needs to be made prior to the submission of the Plan in response to the representation period or as a result of a change to the evidence base, it would be necessary for this to be reconsidered by the Council and if necessary be subject to a further period of Representation under Regulation 19.

5 Views of the Policy Development Advisory Group and Outcome of Consultations

- 5.1 The proposed content of this document has been discussed with Members throughout the process of Local Plan preparation. This has included discussions at meetings of the Planning and Development Policy Development Advisory Group throughout the preparation of the Local Plan since 2018. These meetings have provided advice and feedback to the Cabinet Member for Planning and Development on matters including the emerging evidence base, the site allocation process, and the envisaged policy content of the Local Plan. The chairman of Overview and Scrutiny has also been informed of the preparation of the Local Plan and has provided feedback which has been taken into account.
- 5.2 In addition, a number of all Member events have been held throughout the plan preparation process. The most recent of these have included, all member seminars and briefings on Local Plan preparation covering policy preparation, housing matters and water neutrality. In addition, opportunities have been made available for Members learn more about the proposed site allocations including a tour of a number of large scale strategic sites promoted to the Council. Direct feedback has also been provided to officers by Members including as part of the output of the Sustainable Transport Task and Finish Group. These events and feedback have ensured that Members' views have been taken into account in the preparation of the proposed consultation document.
- 5.3 The process of Local Plan preparation requires that the views of stakeholders and the community be taken into account. This has been undertaken through a number of means, including the two Regulation 18 consultations, and public exhibitions held in February/March 2020. The summary of the public consultation feedback is available on the Council's website <https://www.horsham.gov.uk/planning/local-plan/regulation-18-consultation>. Since the close of the Regulation 18 consultation in March 2020, correspondence and petitions relating to the Local Plan have continued to be received, particularly in relation to potential housing allocations

identified at the Regulation 18 stage of consultation. The content of these have been noted but they have not raised any new views or concerns that had not already been made by others at the Regulation 18 consultation.

- 5.4 Dialogue has also continued with local communities since 2020 including updates to Parish and Neighbourhood Councils; as part of the Horsham Association of Local Councils (HALC) and as individual discussions with Parish and Neighbourhood Councils as appropriate. Most recently this included a series of Parish and Neighbourhood Council events held in September 2023. The feedback from these events was constructive and has led to meaningful changes and updates to the plan policies including proposed allocations. The process for further public engagement will continue with the publication of the Regulation 19 document as set out in section 4 of this report.
- 5.5 As outlined in section 3 of this report, HDC has a legal Duty to Co-operate. In addition to the consideration to direct requests to meet unmet housing needs, the authority has also actively engaged with other Local Authorities and other key organisations such as Highways England (on transport matters) and Natural England (ecological matters) during the plan preparation process to help inform plan preparation, and therefore ensures that the Council has met its legal obligations in this respect. These discussions will continue until the point at which the plan is submitted. The outcome of this work will be set out in Statements of Common Ground between the various parties involved.
- 5.6 The comments of the Monitoring Officer and the Director of Resources are incorporated in this report.

6 Other Courses of Action Considered but Rejected

- 6.1 As set out in paragraph 3.35 a number of alternative options for the Local Plan have been considered as part of the Sustainability Appraisal process. This has tested the ability of the plan to deliver different levels of growth, taking account the constraints placed upon the District as a result of water neutrality. Ultimately it is considered that the proposed Local Plan strategy is an appropriate means of ensuring that housing and economic needs can continue to be provided whilst remaining within environmental limits.
- 6.2 Given the wider Duty to Co-operate requirements, consideration was given as to whether it may be appropriate to prepare joint plans covering a number of Local Authority areas (such as those for North West Sussex – i.e. Horsham District, Crawley Borough and Mid Sussex District). At the point of the commencement of this Local Plan review, the Local Plan authorities were at different stages of plan making which would have made it difficult to align any process effectively, taking into account the requirement to review plans on a 5 yearly basis. It was considered

that the Duty to Co-operate requirements could be met effectively without the need for a joint plan to be put in place.

- 6.3 Another alternative course of action would be not to review the existing Horsham District Planning Framework. However, it is a legal requirement that local plans are monitored and reviewed regularly to ensure that they are kept up-to-date, and to not do so, would leave the Council in breach of this legal duty. It should be noted that the Secretary of State has made interventions where Local Authorities have consistently failed to make progress on Local Plan preparation. For example Wirral Council were given a clear direction to progress their plan. Other authorities where the government have intervened include Castle Point, Thanet, St. Albans, Brentwood and Runnymede. The full list is available on the Government's website <https://www.gov.uk/government/publications/local-plan-intervention-letters-to-councils>
- 6.4 A further course of action would be to continue to delay the progression of the Local Plan until there is a greater degree of certainty over the delivery mechanisms for water neutrality and prepare the Local Plan under the emerging provisions of the Levelling Up and Regeneration Act 2023 (LURA), and in light of any revisions to the NPPF which at the time of writing this report are yet to be published following the consultation held on this document by the government between December 2022 and March 2023.
- 6.5 Throughout the preparation of the Local Plan, government advice has been consistent that Local Authorities should continue to prepare Local Plans and to provide new housing. Throughout the preparation of this local plan, the starting point for plan making has been the government's Standard Housing Methodology. There have been **no proposals to change this process** in either revisions to the NPPF or as part of the LURA. It also remains the case that constraints (such as water neutrality) are and will remain a legitimate reason as to why these targets may not be able to be met. This therefore justifies the approach that the Council has taken when preparing this plan, particularly in relation to water neutrality. Both the provisions of the LURA and the expected revisions to the NPPF therefore continue to support the approach that has been taken, rather than resulting in significant changes to the plan including a further reduction in its housing targets.
- 6.5 In October 2023, the Levelling Up and Regeneration Act 2023 gained Royal Assent. This legislation will bring in changes in the process of Local Plan making. This will include the introduction of National Development Management Policies which are expected to limit the ability for Local Authorities to deviate from national standards and requirements. The precise requirements for these changes will be introduced through secondary legislation, the timescales for which remain (at the time of writing this report) unknown. However, the Government have stated their intention that Local Plans being prepared under the current regime (such as this

Local Plan review) will no longer be able to be submitted for Examination by June 2025 and that this type of Local Plan must be adopted by December 2026.

6.5 Given the Government requirements to prepare a local plan, together with the uncertainties in relation to a new Local Plan preparation process it is considered that the impacts of any delay to local plan preparation would be of greater significance, as follows:

a) At the current time, the Council cannot demonstrate a five-year housing land supply (This currently stands at 3 years). In instances where development can be shown to be water neutral, the 'presumption in favour of sustainable development' as set out in the NPPF applies. In this situation there are limited circumstances in which development can be refused. This therefore leaves the Council vulnerable to speculative development against which it has no control in terms of the location, quantity of development or the level or type of infrastructure provision it can seek. In the last year there are a number of planning applications which have been able to successfully demonstrate that they are water neutral and have been granted planning.

It should be noted that over 500 proposed development sites have been submitted to the Council for consideration as a Local Plan allocation. These sites occur across the District, and at a variety of sizes. With the exception of some very remote or isolated sites, non-strategic scale greenfield sites in particular have the potential to gain planning permission where the presumption in favour of strategic development applies.

b) Whilst most development is currently constrained by Water Neutrality, technological solutions are being developed and this position will not be maintained in perpetuity. In addition the SNOWS programme will also provide mechanisms to offset water. Without a local plan, the Council's five year land supply will be judged against the government's standard housing methodology (currently 911 homes a year). With an adopted plan in place, the Council will be judged against the agreed Local Plan targets. As set out in paragraph 3.19, for the first five years of the plan this would be 480 homes.

c) Many Parishes in Horsham District have chosen to allocate development sites in their Neighbourhood Plans. These parishes are protected from speculative development where the Council has either a 3-year supply (where Neighbourhood Plans are less than two years old) or a 5 year supply (older Neighbourhood Plans). Whilst the revised NPPF may introduce further protections for Plans which have allocated sites for housing development for a full five year period, this does not cover all parishes in Horsham District. Preparation of the Local Plan will therefore help provide the necessary 5-year supply that will ensure that the content of these Neighbourhood Plans is not undermined.

- 6.6 The policies in the draft Local Plan also enable the delivery of higher quality development than our current Local Plan policies require. The ability to require these higher standards would also be lost without the production of the Local Plan. This includes the policy requirement to seek a minimum of 12% biodiversity net gains, rather than the minimum 10% set in legislation, greater focus on delivering active travel, enhanced policies on climate change and improvements in delivering smaller and more affordable homes (e.g. 45% on smaller greenfield sites) which meet the needs of Horsham District residents. A delay to the plan will reduce the day to day benefits to local communities when new development does come forward.
- 6.7 A significant delay to the preparation of the Local Plan risks the Council being required to prepare a Local Plan under the LURA. This would not see a new style Local Plan adopted until at least April 2027, which would leave the District open to the risk of speculative development for a minimum of three years.

7 Resource Consequences

- 7.1 Budgetary provision has been made for the Local Plan Review in the current and forthcoming financial years. There are no direct financial consequences arising from this report in addition to those that have already been identified in relation to the preparation of the Local Plan. These include the normal staff and publication costs associated with the publication of this document for consultation. In addition, it will also be necessary to seek specialist consultant and legal advice to support any updates of the Council's evidence base and to support the forthcoming Local Plan Examination. Whilst some costs are best estimates, these have as far as possible been included in the agreed budget.

8 Legal Considerations and Implications

- 8.1 The Local Development Framework ("LDF") is a non-statutory term to describe a folder of documents that contain a Local Planning Authority's policies relating to the development and use of land in their area. One of the components to the LDF is Local Development Documents ("LDD") and the local plan is a type of LDD.
- 8.2 Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. Section 38(6) Planning and Compulsory Purchase Act 2004. ("PCPA 2004").

- 8.3 Local Planning Authorities responsible for district planning matters should prepare and maintain local plans for their areas. Local Plans must be prepared in accordance with the local development scheme. Section 19(1) PCPA 2004 as amended by the Housing Act 2016.
- 8.4 Further, a Local Planning Authority must complete a review of its local plan every five years starting from the date of adoption of the local plan. Section 10A Town and Country Planning (Local Planning) (England) Regulations 2012.
- 8.5 When plan making, Local Planning Authorities must have regard to (i) national policies and advice contained in guidance issued by the Secretary of State, (ii) the national waste management plan, (iii) the sustainable community strategy prepared under section 4 of the Local Government Act 2000, (iv) policies developed by a local transport authority in accordance with section 108 of the Transport Act 2000, (v) the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment, (vi) any other local development document which has been adopted by the local planning authority, and, (vii) the resources likely to be available for implementing the proposals in the local plan, Section 19(2) PCPA 2004 and Regulation 10 Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations (“LPR 2012”).
- 8.6 Otherwise, the process of local plan preparation and adoption have and will be complied with in accordance with statutory requirements. This includes the preparation of a Sustainability Appraisal incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 together with a Habitat Regulations Assessment in accordance with the Conservation of Habitats and Species Regulations 2017. This documentation, along with other evidence base documents will be made available as part of the consultation process.

9 Risk Assessment

- 9.1 With the preparation of any Development Plan Document, there is a risk that the process could be subject to a Judicial Review on the adoption of the plan. By following the required legal processes as set out in the relevant legislation, the risk of a successful challenge is considered to be low. Other risks include organisational capacity to incorporate unexpected additional work arising from the examination process, and potential impact on other projects such as the capacity to support Neighbourhood Plans (albeit the latter has been mitigated through the procurement of external resources).

10 Procurement implications

- 10.1 There are no direct procurement implications arising from this report. From time to time, it may be necessary to procure the advice from consultants to support the preparation of the Council's evidence base. This will be undertaken in accordance with the Council's procurement policies.

11. Equalities and Human Rights implications / Public Sector Equality Duty

- 11.1 The Equality Act 2010 is concerned with discrimination in respect of specific "protected characteristics" being age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Public Sector Equality Duty requires Local Authorities to have due regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity between different groups and foster good relations between different groups. The preparation of the local plan and any required consultations have been and will be undertaken with regard to the requirements contained in the two aforementioned statutory provisions. In order to consider these issues, an Equalities Impact Assessment has been undertaken to ensure that the impact of the plan on Race, Disability, Gender including gender reassignment, Age, Sexual Orientation, Pregnancy and maternity, Religion or belief has been considered. The summary setting out the outcomes of this assessment is set out in Appendix 10. The Local Plan contains specific policies to address identified equalities issues, and the policies have been updated to take account of the findings of the Equalities impact assessment. For example, this includes the allocation of land to take account to the requirement to provide for the identified housing needs of Gypsies and Travellers within Horsham District. In addition, updates have been made to the plan to highlight the need ensure that developments should be designed to accommodate all sections of society including but not limited to the young, old and those with disabilities.
- 11.2 The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. These rights have been considered during the preparation of the local development document and it is considered that no adverse implications on human rights will arise as a result of the eventual formal adoption of the local plan.

12 Environmental Implications

- 12.1 If adopted, the Local Plan will provide a key mechanism of delivering a wide range of environmental benefits to the District, and therefore delivering the objectives of the Corporate Plan. This includes protecting and enhancing air quality, delivery of green infrastructure and a minimum 12% biodiversity net gain. The policies also seek to ensure that the District achieves net zero carbon by 2050 at the latest.

13 Other Considerations

- 13.1 There are no direct crime and disorder consequences arising from the content of this report. Comments submitted to the Council as part of the representation period will be processed in accordance with Data Protection and General Data Protection Regulation.