



The countryside charity
CPRE Sussex

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

Chapter 7: Conserving and Enhancing the Natural Environment

(Questions: Do you agree with the draft policies in this section?

If not, what changes would you suggest?)

CPRE Sussex's proposed Strategic Policy: Policy – Ecosystem Services

CPRE Sussex considers and recommends that the Plan should have a strategic policy specifically for Ecosystem Services. We propose that the wording (an adaptation of South Downs Park Authority's Core Policy SD2: Ecosystem Services'), be as follows:

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:

- a) Sustainably manage land and water environments;
- b) Protect and provide more, better and joined up natural habitats;
- c) Conserve water resources and improve water quality;
- d) Manage and mitigate the risk of flooding;
- e) Improve the District's resilience to, and mitigation of, climate change;
- f) Increase the ability to store carbon through the retention of existing woodland, new planting or other means;
- g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
- h) Support the sustainable production and use of food, forestry and raw materials;
- i) Reduce levels of pollution;
- j) Improve opportunities for peoples' health and wellbeing; and
- k) Provide opportunities for access to the natural and cultural resources which contribute to the District's special qualities.

2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on

ecosystem services

We consider that an Ecosystem Services policy is needed for the following reasons:

1. NPPF paragraph 170 stipulates: Planning policies and decisions should contribute to and enhance the natural environment by: b) recognising the intrinsic character and beauty of the countryside, **and the wider benefits from natural capital and ecosystem services** – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland .
2. 'Ecosystem services' are the benefits people and society get from the natural Environment, including some of the essentials of life, such as clean air and water, food, fuel and raw materials. It helps to regulate our climate, stores flood waters, filters pollution, and provides opportunities for us to improve our health and well being.
3. We are concerned that the Draft Local Plan does not recognise as it should the importance and benefits of 'Ecosystem Services'.
4. What Ecosystem Services are is neither defined nor adequately explained; they are omitted from the consultation document's Glossary.
5. They are referred to in passing at paragraphs 3.28, in the context of Protection of the District Character and Environmental Net Gain, at paragraph 7 in the context of Green Infrastructure and Biodiversity, and in Policy 31-Strategic Policy: Green Infrastructure and Biodiversity, but are neither defined nor adequately explained, and are omitted from the Glossary.

Dr R F Smith
For and on behalf of CPRE Sussex
27 March 2020