

View Comment

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Comment ID /4342

Respondent [Campaign to Protect Rural Engl...](#)

Response Date 30 Mar 2020

Current Status Awaiting Processing

Response Type OBJECT

What is the nature of this comment?

Object

Summary The scheme is not sustainable.

Comment 1. HDC's site appraisal states that

"There are a number of constraints in this area that could lead to the development impacting on biodiversity, flooding and heritage, and it is affected by noise impacts from Gatwick Airport. Whilst there is potential for mitigation, these issues will need to be resolved and together with the proposal scale of development in this location, the rate at which the scheme can come forward and be delivered may slow the rate at which development can initially commence." And that "a development of this scale will have very significant changes on the settlement pattern and the wider rural character in this area, and a particular concern is the potential for coalescence between Horsham and Crawley". These are all critical issues.

2. Regarding aircraft noise, the 'CPRE Aircraft Noise Study Findings Report', July 2019, shows that the northern part of the proposed site is within the Gatwick Airport noise contours 45db to 60db. Exposure to noise at these and higher levels are associated with adverse effects on health and sleep.

3. Exposure to air pollutants resulting from aircraft emissions and also from road traffic, which the airport attracts, with consequent harming impacts on health, is also a critical issue ('CPRE Flight Blight: the social and environmental cost of aviation expansion', 2019).

4. How the consequent loss of this extensive area of countryside, in effect a green lung, would impact on the residents of Crawley seems not to have been considered. It should be considered,

5, An extensive area of countryside would be consumed by the scheme. HDC's site appraisal acknowledges the presence there of Local Wildlife Sites (LWS) and a Site of Special Scientific Interest (SSSI), and designated Ancient Woodland, but makes no mention of the network of hedgerows that provide vital-for-biodiversity connectivity across the site and beyond.

5.1 The Biodiversity neutral-impact Rating given in the appraisal is invalid, because it would appear that the biodiversity of the site, its flora and fauna, has not been surveyed. Without that information it cannot be determined how the proposed scheme would impact on the site's biodiversity, including protected and priority species.

5.0.2 'Horsham District Council Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan Regulation 18 Consultation, at paragraph 2.58 advises that *"The effects of development in relation biodiversity and geodiversity assets in Horsham will depend in part on the design, specific location of development and as well as the sensitivities of nearby biodiversity designations and other undesignated habitat areas. This is currently unknown and therefore all effects recorded in relation to SA objective 6 are uncertain"*

5.2 Note 'The State of Nature 2019' report advises that *"Ancient woodland, highly important in terms of biodiversity value and supporting a wide range of specialist species is estimated to cover only around 2.4% of UK land"* – and that *"Recreational use, particularly in woodland close to urban areas, has detrimental impacts on soils, invertebrates and flora through trampling and compression"*. How the scheme would impact on the area's biodiversity must be assessed.

5.3 The site appraisal states that the site promoter has committed to providing 10% net biodiversity gain, *"but further information is required to understand how this will be achieved"*. How would this be achieved?

6. Land identified for development within the site includes the Ifield golf course. NPPF paragraph 97, stipulates that:

“

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- 1. a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- 2. b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- 3. c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”.*

Proposed Change **Reject the scheme.**

Attachments