

View Comment

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Comment ID /4508

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 proposed scheme is not sustainable.

Comment 1. HDC's appraisal of the scheme identifies, acknowledges and recognises that:

-“there is a risk that development in this location may have an adverse impact on the vitality and viability of existing villages, including Billingshurst”, which is “.is currently experiencing expansion and where additional land is being proposed for further development”.

-“development of this scale will have significant changes on the settlement pattern and the wider rural character in this area. The potential for the coalescence of development between Billingshurst and Pulborough has been identified as a particular concern”.

- “it is by no means certain” that the proposed new railway station “could be delivered”.

-“ the scheme “has the potential to impact on the listed buildings / Adversane conservation area”.

2. To which we would add that it is by no means certain that the delivery of essential supporting infrastructure for the scheme would or could keep pace with housing growth. And, the proposed scheme

would generate additional infrastructure pressures on Billingshurst and Pulborough.

3. We question the promoter's statement that the development "*will provide one new job per home, which would help to minimise additional commuting*" and the presumption that the majority of these hypothetical 3,500/4,000 new jobs will be provided by Brinsbury College and on site. Common sense and logic suggests otherwise.

4. We note with concern, too, that "*The site promoter has indicated that biodiversity gains COULD be provided on this site*". This seems to suggest that "providing biodiversity gains" is optional and at the discretion of the developer.

4.1. In reality, as is made clear by MCHLG's '*Guidance: Natural environment: Explains key issues implementing policy to protect and enhance the natural environment, including local requirements*', development is required to achieve net biodiversity gains. It is neither optional, nor at the discretion of the developer.

5. We note the statement, HDC's Site Appraisal, that "*It is considered that development in this location **would have some traffic impacts** upon the A29 and B2133 and within Billingshurst, Pulborough, Adversane, West Chiltington and surrounding area*". We suggest that this an 'understatement' of the reality: 3,500/4,000 new homes would have traffic impacts of a much much greater magnitude than "some traffic impacts" implies. Most certainly the 'Neutral Impact' Rating for 'Transport' warrants an 'Unfavourable Impacts' Rating, if not a 'Very Negative Impacts' Rating.

6. We question, too, the validity of the site appraisal's '*Site Suitability Ratings*', because, excepting the Rating for archaeology, appear to be unsubstantiated by evidence, and are therefore notional.

Proposed Change Reject the scheme

Attachments