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Comment ID /4348

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 acknowledges that "a development of this scale will have significant changes on the settlement pattern and the wider rural character in this area" and that "The landscape contains some sensitive areas, particularly to the north. The site is close to some listed buildings and the design of any development would need to take account of the setting of these buildings to minimise any potential harm to their setting" (page 74).
2. HDC's site appraisal acknowledges that -"*The site is relatively remote from existing settlements (8km from Horsham), and there is no railway station nearby*" (page 75).
 - 2.1 The site is therefore located beyond reasonable walking and cycle distance from rail services serving the main employment centres. The settlement will therefore be car dependent, with ramifications for road traffic and air quality.
3. HDC's appraisal of the proposal (page 75) acknowledges that "*The precise nature*" of the delivery and the details of bus services and a Park and Ride, proffered by the scheme's promoter, "would work and be effective in reducing car use has not been fully demonstrated".

3.1 And crucially, *“The site will still generate traffic impacts on the wider road network, particularly in combination with other development and this will require further study in terms of the level of mitigation that may be required particularly along the A24 and A272 corridors”*.

4. Crucially, too, *“The site is relatively close to Cowfold, with direct road access to this settlement from the proposed site via the A272. The centre of Cowfold has been designated as an Air Quality Management Area due to poor air quality that has predominantly arisen because of high traffic volumes in this area. There is potential for additional traffic generated by this proposal to have an adverse impact on the air quality of this area, which will need to be understood and mitigated”* (pages 74,75).

4.1. The Horsham District Council/Sussex Air Air Quality Partnership ‘2019 Annual Status Report (ASR), page iii, states that “The achievement of congestion improvement measures in Storrington and Cowfold has been challenging as there are no easy solutions, and many of the solutions fall outside the power of HDC to implement”.

5. Development on the scale proposed is likely to generate additional infrastructure pressures on Southwater, Horsham and perhaps Storrington, too.

6. HDC’s site appraisal advises that “At this stage, the promoter has stated that essential infrastructure would be delivered early” (page 76). We question whether ‘early delivery’ of essential infrastructure is achievable.

7 “The site promoter has recognised the need to minimise climate impacts but although they are proposing to minimise energy use of the buildings and the provision of electric car charging points and provision for new vehicles provision of renewable energy technologies on site is not proposed” (Site appraisal, page 75).

7.1 We question whether not providing renewable energy technologies would be consistent with the Government’s legally binding commitment to achieve net zero carbon by 2025. We therefore consider that the Rating for Climate/ renewables/energy efficiency should be either ‘Unfavourable Impacts’ or ‘Very Negative Impacts’, not the ‘Neutral Impact’ Rating given in the Ratings-for-the-scheme table at page 74.

7.2 We consider, therefore, that for the reasons explained below the ‘Neutral Impact’ to Biodiversity, given in the Ratings-for-the-scheme

table at page 74, be increased to either 'Unfavourable Impacts' or Very Negative Impacts'

8. As is acknowledged in the site appraisal, there are within its bounds, designated ancient woodland. Ancient woodland is irreplaceable '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" (Page 22),

8.1 The State of Nature 2019 report also advises 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 Ancient Woodland and biodiversity and other priority habitats, including hedgerows, ponds and watercourse must be assessed.

9. We note the statement in the 'Horsham District Council Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan Regulation 18 Consultation, at paragraph 2.58, 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".

Proposed Change Reject the scheme.

Attachments