

Matter 9 question 11:

There appears to be no full assessment of the potential impacts and no appropriate mitigation strategy, therefore this development application would need to be 'called in' and reviewed by the Secretary of State.

Para 186c of the National Planning Policy Framework, (a material consideration in planning) clearly states 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees that are close to the proposed site) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.' Examples of wholly exceptional reasons include:

infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat as stated in the NPPF. A housing project is not a wholly exceptional reason

as it would benefit only a small group of people who are able to afford to buy or rent those houses and the benefits of the houses would only be limited to this group.

In spite their own report acknowledging that "impacts in terms of habit fragmentation and disturbance are invariably likely to occur" on the ancient woodland and local biodiversity designations, HDC has proposed the site for strategic development. Their December '23 site assessment report fails to include any reference to the Ancient Woodland or this detailed evidence of "invariable impact" which they are clearly aware of. This fails the 'justified' test of soundness, effectiveness, or consistency.

David Hingamp - Billingshurst Parish Councillor