

## **Horsham Local Plan Examination**

### **Written statement from Save West of Ifield**

Submitted by Fenella Maitland-Smith on 22<sup>nd</sup> November 2024.

#### **Matter 9, Issue 1 - Whether the strategic sites allocated in the Plan and associated policies are justified, effective, consistent with national policy and positively prepared?**

##### **Q9. Is Strategic Policy HA2: Land West of Ifield sound?**

No. The allocation of West of Ifield (WOI) is not based on a sound understanding of the natural characteristics and value of the site and surrounding area, and is inconsistent with several paragraphs of the NPPF.

We note that Natural England (NE) suggest Policy HA2 is unsound, in their Reg 19 response. In summary:

- “The masterplan does not reflect the importance of this area for an internationally significant species. A requirement of Policy HA2 is to mitigate impacts on protected species, including Bechstein’s bats”
- NE is “particularly concerned about the scale, quantum and location of development proposed, which at present will impact an area of regional importance to Bechstein’s bats. Any development here should be sensitively designed and limited in scale and this is not currently reflected in the masterplan.”
- NE would also “expect strategic sites to contribute to Horsham’s Nature Recovery Network.”
- “The site is bounded by a complex of ancient woodland and priority habitats an includes priority deciduous woodland and linear wetland features which will be of clear importance to biodiversity”, and
- Natural England “advise that the policy does not demonstrate that impacts have been avoided and does not follow the requirements of the mitigation hierarchy contained in the NPPF”.

##### **Extracts from our Reg 19 response**

The allocation of WOI is not based on a sound understanding of the natural characteristics and value of the site and surrounding area, and we’re concerned that these are being played down. This is inconsistent with NPPF paragraphs 31, 35 and 174, 179 and 180. See comments regarding lack of data under Question 9h below.

- i. Nowhere in the Plan or Evidence Base is there a comprehensive and accurate list/map of the designated areas and irreplaceable habitats in close proximity to the site, despite NPPF 179a requirements.
- ii. The Plan’s requirements in respect of the Bechstein’s bat are inadequate, and inconsistent with NPPF 179b and 180.
- iii. The lack of cross-border collaboration into Surrey related to the bats, the River Mole and wildlife corridors is inconsistent with NPPF 174 and 179b.
- iv. The Plan disregards key impacts of the development and the HA2 requirements are too weak to prevent significant biodiversity loss from the site and surroundings given the scale.

##### **Q9a) What is the justification for the proposed number of dwellings and employment in total and over the plan period?**

There is no sound justification for a development of this size at this location. HDC’s arguments for locating a development of this size on Crawley’s boundary are unsubstantiated. It’s hard not to conclude that this is a politically motivated decision by HDC to “dump” unpopular housing on the edge of the District, with the political advantage that Crawley’s services will bear the brunt, and Crawley’s roads will cope with the increased traffic.

As explained in our Reg 19 response:

1. Horsham does not need the housing. Nonetheless HDC seems determined to accommodate the housing proscribed by the Standard Method (water neutrality constraints notwithstanding), rather than arguing for a lower overall target and properly planning for sustainable growth in population and prosperity. The Plan fails to adequately explain or address the fact that Horsham District is experiencing and will continue to experience unsustainable population growth, caused by excessive house-building, driven by the Government's Standard Method. **This contravenes NPPF paragraph 8** as well as forcing HDC to find more and more land to accommodate unnecessary housing, such as at the West of Ifield.
2. HDC claims the houses are being built to meet Crawley's unmet housing need, despite Crawley BC strongly opposing the Plan and making clear that these are not houses for Crawley people. The most pressing need in Crawley is for social housing, but this is not mentioned in Policy HA2. If the housing West of Ifield was genuinely intended to benefit Crawley then there should have been much closer planning between the two authorities on strategic matters, and perhaps even a joint-plan on some aspects. Not least because Homes England and HDC view the site as a possible first stage of a 10,000 house development that would fundamentally alter the character of the area. The Plan, the HA2 policies and the working with Crawley BC should all take this into account. They do not and hence **NPPF paragraph 22 is contravened**.
3. HDC claim that the HA2 allocation will support growth, innovation, and improved productivity. But this isn't possible because it delivers **too much housing and too little employment** in an area which already needs significant additional employment land. In fact, it will only worsen Crawley's existing need for employment land. The Plan is proposing only 17ha of new Employment Land across the District, and only 2ha of it at West of Ifield. So **the creation of jobs on site will be minimal**. The Plan's reliance on Gatwick and Crawley to drive employment is likely to be misplaced, both in terms of the numbers and quality of jobs.

#### **Q9d) Is the allocation consistent with paragraph 99 of the NPPF, particularly with regard to the loss of Ifield Golf Course?**

Our Regulation 19 response by Smith Leisure focussed on HE's position that Ifield Golf Course (IGC) was surplus to requirements. Since then HE have published<sup>1</sup> a WOI Draft Golf Needs Assessment and a Draft NPPF Para 103 (99) Assessment, and they now accept that *"IGC cannot clearly be demonstrated as being surplus to requirements"* – and so fails test (a).

**HE have also published (draft) proposals to mitigate for the loss of IGC. These proposed mitigations are not sound.**

##### **1. NPPF 99b – replacing with equivalent or better in terms of quantity and quality**

HE are not proposing a like-for-like replacement of IGC, but to fund basic repair and renewal works at three municipal courses in Crawley and Horsham. **No sound evidence or argument is presented to show that this is "equivalent or better" than IGC, and NPPF 99b is not satisfied.**

HE's draft proposal is unsound because:

1. Supporting evidence is either missing or inaccurate. The baseline evaluation of IGC is based on subjective and un evidenced statements. See Annex A for list of inaccuracies, but in summary:
  - i. No evidence that all IGC's existing members and casual players can be easily accommodated at other existing clubs within IGC's catchment.
  - ii. HE focusses on IGC's 510 full members, their subscription and demographics, ignoring the 5.500 visiting golfers.
  - iii. IGC's simulator, outreach programme, and other support for those "early in their golf journey" are not acknowledged.

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<sup>1</sup> <https://westofifield.commonplace.is/en-GB/news/west-of-ifield-draft-golf-needs-assessment>

- iv. The loss of sport and recreational benefits for older residents is not considered, nor the community recreational benefits of IGC.
  - v. No acknowledgement that IGC demand is strong given the club's uncertain future.
2. Smith Leisure's report provides clear evidence that IGC is a popular and very high quality 18-hole golf club, considered of high sporting and community value historically and currently.
  3. We note that the meaning of 'provision' is not specified in paragraph 99, but it is stated that the alternative provision must be 'in a suitable location' suggesting a single site, and not strewn across multiple locations.
  4. HE's case for not replacing IGC like-for-like is that IGC is misaligned with England Golf's strategic aims, in contrast to the HE alternative which will encourage younger players and women, and those at the start of their "golfer journey", and is hence "better" in an NPPF 99 sense. This is a controversial interpretation of NPPF 99, and HE cite the Mapledurham Judgement but don't explain how this is relevant for the West of Ifield. They also don't explain how their proposals actually achieve the England Golf aims.
  5. To support their case HE repeatedly state that there is or will be unsatisfied local demand from the target groups but provide no evidence. They mistakenly suggest that IGC does not encourage these groups. And they fail to explain the range and quantity of facilities needed by these groups. The lists of improvements provided for the municipal courses are completely unconnected to the discussion of needs.

## 2. NPPF 99c – replacement with alternative sports and recreation provision.

**No sound evidence or argument is presented to show that "the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use" and NPPF 99c is not satisfied.**

HE claim<sup>2</sup> that "the wider sports and recreation offer unlocked by the development is significant. ... both the sport and recreation offer would clearly outweigh the more limited value of IGC to the non-golfing population as both a golfing, sporting and recreation facility more generally. **This would deliver a significant quantum of alternative provision and a range of benefits that would outweigh the loss of the IGC facility and would satisfy requirement (c)**".

This misinterprets NPPF 99c. WOI is a housing development, with sport and recreational provision for the new residents. The focus of this NPPF 99 analysis should be on any facilities being offered in excess of those needed to serve the new residents – this excess could be considered as mitigation for IGC. **HE's comparison of the total "sport and recreation offer" with the value of IGC is unsound.**

Confusingly, HE's Annex E<sup>3</sup> (1.4) is clear that it doesn't deal with the mitigation for the loss of IGC. Whereas the last column in Table 3 (NPPF 99/103 document) could be the mitigation for IGC (the excess), but this isn't discussed.

In conclusion, HE's proposals are not soundly based or evidenced, and we're concerned that they could set a precedent for "marginal" mitigation for loss of facilities.

### **Q9e) Have the transport impacts of the proposed development been adequately assessed and is the mitigation proposed sufficient?**

No. There are insufficient mitigations to address the effects of additional volumes on the local transport system.

The assessment conducted by West Sussex Highways was desk-based, and did not (to our knowledge) involve actual traffic monitoring. Proposals place all traffic entering and exiting the site via Ifield Avenue (already severely congested at peak times). The desk-based approach cannot be adequate to provide confidence in the ability of the

<sup>2</sup> Para 7.2 3<sup>rd</sup> bp of the NPPF 99/103 document. We also note that para 5.35 onwards and Table 4 compare IGS with the benefits from the sum of facilities in the Masterplan..

<sup>3</sup> HE's Annex E – "The West of Ifield Sports and Recreation Study" prepared by Sports Planning Consultants – which covers all the sport and recreation facilities planned for the WOI development, with a focus on the facilities needed to serve the new residents.

proposed mitigations to prevent a very significant impact on traffic flow and air pollution across many residential roads of Langley Green and Ifield.

If the assumptions currently in place prove to be wrong, it will be too late for the existing residents, who will struggle to secure a post development solution.

Our view remains unchanged from our Reg 19 submission that the development would have a major negative impact on the existing traffic issues in the Crawley area by adding additional vehicles.

Crawley Active Travel forum have had discussions with Homes England in a positive attempt to understand and help to improve the proposals. No specific changes have been made, as far as we are aware, and no further meetings have taken place – probably because of the General Election.

**Q9f) Have air quality impacts been adequately assessed and is the mitigation proposed sufficient?**

- As outlined in our Regulation 19 response, the cumulative effects will come from the increase in traffic along Ifield Avenue (and roads that branch off it) combined with the potential air quality impacts from the expansion of Gatwick.
- There is not yet a sufficiently detailed travel plan for the pollution impacts to be assessed.
- While electric cars will reduce exhaust fumes, the additional number of cars will add to the pollution from oil droplets, and fine and ultrafine particles from wear in metal and tyres.
- HDC has already drawn attention to the potential air pollution impact of the construction phase (ref. HDC: EIA/24/0003, 15 July 2004).
- There is not sufficient joint working on this important cross-boundary strategic matter.

**Q9g) Have water and flooding impacts been adequately assessed and is the mitigation proposed sufficient?**

- Water supply remains a risk because of the restrictions from water neutrality. The WN strategies of reduce, reuse, offset will continue until new sources are found. Offsetting schemes are in their infancy. Whether tapping into new ground water sources by Southern Water and private developers will supply sufficient water at a sustainable level is not yet known.
- Water quality in Ifield Brook and River Mole will be impacted from increased run-off from roads into the waterways and detritus blown into the water ways. (see Sewage also)
- Sewage: It is evident from Thames Water's response #1193334 to reg 19, that HA2 presents a major problem for them. Another year of regular, and rigorous, water testing from the River Mole River Watch group, shows that much of the river downstream of the site is still not in a good state.
- Flooding: While SuDs and raised building levels could mitigate surface water flooding within buildings, we still have concerns about river flooding of the site in extreme weather events given that the site has three water courses through it (River Mole, Ifield Brook and an un-named water course). Risk from inundation from Ifield Mill Pond and Douster Pond is small but not negligible. Flooding downstream is also an issue. With Southern Water supplying water and Thames Water receiving it, all the water used in the development flows additionally into the Mole via the Crawley STW – and hence increases risk of flooding downstream.

**Q9h) Have heritage, biodiversity, and landscape impacts been adequately addressed and is the mitigation proposed sufficient.**

**Heritage:** As made clear in our Reg 19 response, the impacts on Ifield Village Conservation Area and on the design concept of Crawley as a post war New Town have not been adequately assessed.

## **Biodiversity**

### Extracts from our Reg 19 response

**Biodiversity and habitats have not been adequately assessed** and we are seriously concerned at the lack of ecological data available at the point the site was allocated into the Plan.

- i. Nothing is presented in to suggest that the allocation was informed by survey data, consultation with wildlife groups, neighbouring authorities or any other sound evidence regarding biodiversity value or amenity value. It appears to have been entirely a desk-based exercise. All surveying is to be left to Homes England (HE), which, judging by the EIA Scoping Requests (2023 and 2024) might be very partial. An FOI request to HDC failed to establish the extent of any surveying and whether HE have shared data with HDC. Our requests to HE for permission to conduct hedgerow or other ecological surveys have been refused.
- ii. A historical lack of recording of the area means that its true biodiversity value is unknown. But the results released by HE so far suggest that the biodiversity, and presence of priority species, is much higher than expected.
- iii. HDC's assessment and understanding of existing and potential biodiversity value across all Strategic Sites is inadequate and so the scoring and comparison of the sites in the Sustainability Appraisal (SA) is highly questionable. See Sussex Wildlife Trust's response at Regulation 18, which HDC have not actioned: *"...the plan should not be taken forward as the significant effects on biodiversity remain unquantified and poorly understood ..."*.

### New information made public since the Reg 19 consultation.

HE have made public a limited amount of survey data, and have set out their intentions in various drafts of their EIA Scoping Request, most recently in June 2024. In response, Natural England said: *'The area likely to be affected by the development should be thoroughly surveyed'*. We have urged HDC to require more of HE.

Nowhere in the EIA is there an explanation of how the **ecological value** of designated sites (and other features) has been or will be assessed. Designated sites are described, but without any mention of surveying. Justifications for scoping sites in or out for future study are based on distance from the site, not the presence or absence of ecological features.

The description of the ecological **baseline assessment** is confused and vague which doesn't inspire confidence that it is being conducted in line with the CIEEM Guidelines, and will be adequate.

Despite the emerging conclusions about the **Bechstein's bat population** (Ramboll report – annex to the 2024 draft EIA) being based on incomplete survey evidence, HE are assuming the conclusions hold and that WOI is not of particular importance for the local population. The use of the golf course by the bats is being down-played.

### **Is the mitigation proposed sufficient?**

We note that the Horsham ecologist in their response to the HE's 2024 draft EIA suggested that

*"...this site has potential to meet published selection criteria for Special Area of Conservation (SAC) designation if there is sufficient evidence to support that the Bechstein's bat maternity roosts in this area and the surrounding area are of, or could be restored to, favourable conservation status. This is something that the Applicant will need to consider."*

The lack of understanding of impacts means the mitigations and requirements in HA2 are weak and in some cases unachievable. See Annex B for our suggestions for strengthening HA2 – as per our Reg 19 response to HA2 – Habitat and biodiversity.

In our response to the 2024 EIA Scoping Request we expressed concern that:

- a. Mitigations for the Bechstein's bats have already been designed, and will be minimal and superficial. For example, see page 11 of the Ramboll report.

- b. 'Key design concepts' are listed on page 7 onwards but it's hard to see how key ecological corridors, connectivity and 30m buffers can be retained around hedgerows and copses given the building density, particularly across the golf course and along Ifield Brook.
- c. Figure 5 should show playing pitches and sports facilities – they're on the edges of the site adjacent to woodland and could involve significant artificial lighting.

Other concerns we raised at Reg 19:

- No requirement to minimise the impact of the road and its effect on the habitats it crosses, particularly the River Mole.
- No policy on minimising the habitat loss and disruption during construction.
- No acknowledgement that Ifield Brook Meadows Local Wildlife Site will become isolated – surrounded by housing – with all ecological connectivity to the countryside severed. Despite Sussex Wildlife Trust raising the concern in 2020. No evidence that HDC or HE have consulted Crawley BC about Ifield Brook Meadows, Willoughby Fields LNR and other LWSs.
- The Sustainability Appraisal assumes the requirements and mitigations in HA2 will be much more effective than the requirements for other sites. based on a lack of understanding of the site, its biodiversity and the impact of the development.

**Q9k) Are the infrastructure requirements identified reflective of the latest evidence, justified and effective?**

- The infrastructure proposals are inadequate as detailed in our Reg 19 submission. We're concerned that the people of Langley Green have not been included in the consultation process and therefore not had the opportunity to adequately feed in their concerns.
- Sewage: There is a clearly identified problem in many of the evidence documents that Thames Water may not be able to supply the sewage facilities in the timeframe required.
- Power: We have no evidence that the capacity of the electricity distribution network is sufficient to cope with the additional load.

## ANNEX A. Errors and inaccuracies in Homes England's Assessments – September 2024

1. IGC has a stable membership. And, it is one of the few clubs bringing down the average age (from 64 years to 59 years) with proactive Social Media marketing to new golfers.
2. In 2024 IGC has grown its membership by 4% and increased unique visitors to over 5,500 meaning that IGC has a 69% fill rate in season (fill rate = daily usage of available tee times from dawn to dusk). IGC is a successful club with capacity issues in the season.
3. The area has seen a number of clubs close over the last 10 years, Pease Pottage, Rusper, Redhill & Reigate, Mannings Heath reduced by 9 holes and Cottesmore reduced by 9 holes leaving a high latent demand for golf in the area. The remaining clubs are full or near to full and cannot facilitate 500+ members and 5,500+ visitors from Ifield Golf Club.
4. IGC membership predominately lives in Crawley. Horsham District has a population density of 277 per square kilometre v Crawley Brough Council of 2,625 per square kilometre. IGC serves Crawley with 60% membership in Crawley postcodes and 70% in under 4 miles & 89% within the 20 minutes England Golf catchment.
5. Homes England using Sport England and England Golf as sources have published information working to a 20-minute drive time map. This is then ignored in the detail statements by only reviewing HDC and or CBC with no consideration of Mole Valley, South Surrey and Redhill & Reigate. Homes England also add Slinfold GC outside of the designated area. Statements are therefore misleading and incorrect.
6. The HE Assessment looks at HDC, not CBC which has one course within its boundaries and not North of IGC to towns like Horley which does not have a golf course. Their focus is on HDC & CBC. IGC is on the Sussex Surrey border and District Councils such as Mole Valley and Redhill / Reigate are in the 20 minute catchment. The England Golf metric is catchment area not District Council boundaries as set out in the report.
7. Price statement is false. Benchmark Clubs subscription rates – Mannings Heath £1,918.50 / Copthorne £1,638 / Horsham Golf & Fitness £1,400 & IGC £1,375). Note the average spend to be a member of IGC is £751.50 averaged across all categories of membership.
8. IGC is on the same soil conditions as the other local courses and has the same rainfall. All Sussex Weald type courses have winter challenges during periods of high rainfall. IGC is not unique.

## ANNEX B. Suggested modifications to Policy HA2 iro Biodiversity – Criteria 4.a – d

Additions in **bold and underlined**.

Extract from SWO's Reg 19 response to Policy HA2, pages 6-8.

4. Proposals must **protect the existing biodiversity** and provide a comprehensive Ecology and Green Infrastructure Strategy, incorporating a Biodiversity Gain Plan, to demonstrate how a minimum 10% net biodiversity gain will be achieved on the site, and in particular demonstrate:

a) that the **integrity of Ifield Brook Meadows Local Wildlife Site and Local Green Space is conserved and the biodiversity enhanced, ensuring an appropriate buffer that maintains and provides wildlife corridors to other important wildlife sites;**

Strengthening of the policy is needed because:

- Ifield Brook Meadows LWS has a high biodiversity value but will be sandwiched between the most densely built part of the proposed development and the urban edge of Crawley (Map A). The HE proposals for cyclepaths and footpaths, and even a playground, do not protect and enhance the site. The policy should specify that the integrity of the site should be maintained with no new pathways access points or crossings to ensure that the existing ecology is not impacted. Specific Example: The site will be cut in half by the pathway west/east which terminates at Rudgwick Road, Ifield. See Sup Doc A - Priority habitats and species;
- The connectivity of the LWS – particularly the corridors to the west – will be harmed, and could be destroyed by the WOI development;

- Ifield Brook Meadows currently form Crawley's only remaining rural fringe, are designated by CBC as a Local Green Space and are enjoyed by walkers and naturalists, as well as protecting the character and views to and from the Ifield Village Conservation Area and Grade 1 St Margaret's church. Additional access and extra footfall would impact the relatively undisturbed 'wild' nature of the LWS / LGS. See Sup Doc A;
- A management plan which covers the specific habitats and priority species of Ifield Brook Meadows should be required as part of the policy. It is worrying that Homes England are not as yet scoping Ifield Brook Meadows into their EIA; and
- 'An appropriate buffer' is not a specific enough statement of policy and HDC should provide more specific guidance with a reference to follow recommendations from ecologists. Ifield Brook Meadows would need to be increased in size and linked to other sites via existing and new wildlife corridors to achieve BNG on site.

*b) that the Ancient Woodlands and **important Hedgerows at Ifield Mill Stream LWS, Hyde Hill LWS, The Grove, House Copse SSSI, Willoughby Fields LNR** and Ifield Wood are protected and enhanced, ensuring an appropriate buffer;*

Strengthening of the policy is needed because:

- It fails to mention all the ancient woodlands and hedgerows which will be impacted. The omission of the ancient woodland of House Copse SSSI is particularly surprising, as is the omission of Willoughby Fields LNR. See Sup Doc A for more detail;
- Apart from the SSSI these woodlands are so close to the development that they will be impacted by additional footfall, particularly given HE are promoting access to these areas of countryside as a benefit for new residents;
- The absence of any buffer zone guidance in the policy will allow the developer to build too close to these sites.

Specific Examples: House Copse SSSI is missing from the list of sites, this is close (650m) to the south west of the site and an important Ancient Woodland.

*c) the delivery of a biodiverse River Mole Linear Park, which protects and enhances the riparian ecosystems along the River Mole corridor **and protects or creates wildlife corridors to other wildlife sites in the area;***

Strengthening of the policy is needed because:

- There is a risk that the Linear park will simply amount to a buffer on either side of the river. To really protect and enhance ecosystems will require corridors along, and leading away from, the river. It will also require effective cooperation with Wildlife Trusts, the Gatwick Greenspace Partnership, Crawley BC and Mole Valley DC. This cooperation should be specified in HA2;
- The habitats and species associated with the River Mole and Ifield Brook are not acknowledged sufficiently in the Plan, Evidence Base or the draft EIA. They should be subject to separate detailed assessment and discussed in a dedicated section of the EIA. The streams of the Upper Mole run through and around the site, and are very important ecological features, particularly in terms of habitat and connectivity. The waterways, riparian zones and surrounding woodland all serve as important corridors, particularly for the Bechstein's bat;
- The draft EIA states that '*effects on watercourses are considered to be limited*'. But in their response to the EIA, HDC's Ecology Officer wrote: '*It is welcomed that the maintenance of the integrity of the site's existing wetland habitats, including Ifield Brook and River Mole and pond habitats where possible, have been regarded within the potential mitigation measures. However, further in-depth consideration and mitigation measures will be needed with respect to the construction of the bridge over the River Mole (para 3.1.3), as this has potential to alter the ecological function and have knock-on effects.*' And the Environment Agency (EA) noted '*a significant lack of consideration with regard to the aquatic environment, predominantly invertebrates, fish and supporting habitat*' (7.2.1).
- The development will inevitably have a significant effect on the watercourses within the site and on the Mole downstream:
  - Changes to the river and wetland dynamics caused by the use of SUDs,
  - The increased pressure on local waste water treatment works (WWTW) of 3,000 houses, given the current problems with sewage outflows into the Mole, and



- The pollution from an additional 4,000+ cars using roads, across the River Mole. Research shows that rivers next to roads are contaminated by large particles from tyres and chemicals from engine fluids.

*d) that other ponds, watercourses, wetlands, ecologically important hedgerows and woodlands and veteran trees are in the first instance **recorded**, protected and enhanced in situ, or else impacts appropriately mitigated to ensure the protection of protected or vulnerable species.*

This policy requirement is incompatible with the West of Ifield proposals and will be impossible to implement because the proposal for a road (MMTC) crossing the river Mole through the centre of the Linear Park will cut through wildlife corridors – not least the River Mole – and the development overall will damage the network of trees and hedgerows connecting the River Mole corridor to the surrounding habitats.

Having said that strengthening of the policy is needed because:

- There is no indication that HDC has undertaken any survey work of the important hedgerows to record what exists on the WoI site. Records of local naturalists (authors) show that there are important hedgerows and habitats that have not been recorded and will be destroyed by development. We have specific concerns about the hedgerows where the MMTC will cross the River Mole (TQ241377) and have recorded these in detail. Similarly the hedgerow which links the River Mole to the Ifield Wood area (TQ241378). These hedgerows have been in place since the 1850s according to OS maps. See Sup Doc A;
- The policy should require that veteran and notable trees and hedgerows are identified, and trees that meet the criteria for a Tree Protection Order should be designated. There are veteran tree candidates in the centre of the proposed development;
- Where known priority species exist and have been recorded these need to be clearly identified and named in the Local Plan Evidence Base with their locations and habitats specifically designated for protection and a local habitat management plan produced for these species, again in the Evidence Base. Examples include the hedgerows which are flightlines for the Bechstein's bats and those used for egg-laying by Brown Hairstreak Butterflies. Two ponds with recorded population of Great Crested Newts are shown to be replaced with buildings near TQ237372 (opposite Old Pound Cottage).

Given it is impossible to protect all these features and at the same time deliver the WOI proposals, and that on-site mitigation is not possible to the extent required, we presume that HDC is accepting and planning for off-site BNG.