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**From:** Planning@horsham.gov.uk  
**Sent:** 14 July 2020 23:06  
**To:** Planning  
**Subject:** Comments for Planning Application DC/19/2464

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:06 PM on 14 Jul 2020.

## Application Summary

**Address:** Berkeley Homes Development Site Worthing Road  
Southwater RH13 9BT

**Proposal:** Erection of 80 dwellings with associated access, parking  
and landscaping at Land West of Worthing Road (Phase  
5), Southwater

**Case Officer:** Matthew Porter

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## Customer Details

**Address:** 7 The Laurels Southwater Horsham

## Comments Details

**Commenter Type:** Member of the Public

**Stance:** Customer objects to the Planning Application

**Reasons for comment:**

- Loss of General Amenity
- Other
- Overdevelopment
- Trees and Landscaping

**Comments:** The amendments to this planning application, submitted by Berkeley Homes (BH) since the previous opportunity for public comment closed in January, appear not to answer any of the principal objections that I raised at that time, and to which I now wish to add the following.

As regards my objection to the proposed development on the grounds of its likely adverse impacts on air quality, these would appear only to have been underlined by the concerns raised by the Council's Environmental Protection Officer (EPO) in a Memorandum dated 6th April 2020 to the Case Officer for the application - none of which appear to have been addressed in any 'associated document' available online to the public. Thus with respect to the applicant's (second) Air Quality Assessment report, the EPO warned that regarding its modelling results, because the calculated adjustment factor of 2.9386 is so high (# 4.27), "the model is significantly under-predicting the results" and therefore the applicant should "provide full details of the model verification to ascertain the model's accuracy - including

the difference between monitored and modelled road NOx contribution at the verification site...." Moreover, regarding the report's damage cost calculation (# 5.29), she warned that "the applicant chose to calculate the costs for 'rural' road traffic which significantly underestimates the costs compared to the calculation being done for 'urban small' traffic," whereas "Southwater is a large settlement, and traffic on the Worthing Road should... instead be categorised as 'urban small' ". Finally she warned that "no mitigation for the operational phase of the development was proposed" (cf. 6.17), whereas "in accordance with the Air Quality and Emissions Mitigation Guidance for Sussex (latest update is 2020), applicants are required to submit a Mitigation Plan detailing proposed measures to mitigate and/or offset the impacts, where the estimated value of the proposed measures should be equal to the environmental damage costs".

As regards my objection to the proposed development on the grounds of its likely adverse impacts on 'green infrastructure' and biodiversity, this reflected the concern expressed by nearby residents at the BH proposal to remove significant stretches of hedgerow along the site perimeter and that too many of its trees had been earmarked for removal, such as would lessen the capacity of this 'green infrastructure' to screen the new housing from, and thereby soften its impact upon, adjacent countryside to the south and west. In a letter dated 22nd June 2020, BH now proposes to reduce from 394 to 186 the number of trees that it agreed to plant on site (including in the back gardens of the new houses), with the balance of what would have been planted to compensate for the vegetation removed taking "the form of a commuted sum towards provision on HDC-owned land elsewhere in the Parish". It is not known what advice to the Case Officer the Council's Senior Landscape Architect has given in respect of this latest BH proposal (as the content of her response dated 8th July is not available to view online nor it seems in practice to those requesting it), but if it accepted, then not only would the site be deprived of much-needed additional green infrastructure but the Council would be left responsible for nurturing the planted saplings until mature. (This is not however a responsibility that BH seems to have performed very assiduously as regards those saplings planted elsewhere on its Broadacres development as many of these are reported to have died for lack of watering). Moreover in her Memorandum to the Case Officer dated 1st April the Senior Landscape Architect noted that "there isn't a landscape masterplan as such, so unless you check the detailed planting plans, it's difficult to have an overview of the planting within the site"; but among the associated documents publicly available online no landscape masterplan yet appears nor are the proposed trees distinctively marked on a definitive layout plan as she (alternatively) advised.