

[REDACTED]

From: [REDACTED]
Sent: 10 January 2020 11:40
To: Planning
Subject: Objection to DC/19/2464 Southwater
Attachments: CPRE SUSSEX Objection to DC 19 2464 West of Worthing Road Southwater.docx

Attn.: Case Officer Mr M Porter

Dear Mr Porter,

Please find attached my representation for and on behalf of CPRE Sussex objecting to planning application DC/19/2464: **Erection of 80 dwellings with associated access, parking and landscaping at Land West of Worthing Road (Phase 5), Southwater. Berkeley Homes Development Site Worthing Road Southwater RH13 9BT.**

Yours sincerely,

[REDACTED]

Attn.: Case Officer: Mr M Porter

Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

10 January 2020

Dear Mr Porter,

Representation submitted for and on behalf of CPRE Sussex objecting to:

DC/19/2464

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

Berkeley Homes Development Site Worthing Road Southwater RH13 9BT

Our reasons for objecting to this application are explained below.

ADDRESSING CLIMATE CHANGE: MEASURES TO REDUCE THE SCHEME'S CARBON FOOTPRINT

1. Contrary to the view expressed in the applicant's 'Energy and Sustainability Assessment' it would appear that solar panels, as well as fabric-first demand-reduction measures, will be needed to reduce and minimise the schemes carbon footprint – and in so doing contribute to reducing and minimising Horsham District's contribution to Climate Change

1.0.1 Surely, the level of reductions that can be achieved is not constrained by the calculated 'Part L 2013 baseline' figure calculated for the scheme? Clarification would be helpful.

1.2. The Horsham District Planning Framework stipulates that

"there will be a low carbon economy with energy efficient development including district heating and renewable energy. Development will be both adaptable to the impact of climate change and will mitigate its effects" (paragraph 3.11)

"It is widely accepted that climate change is being generated by increasing levels of carbon dioxide (CO2) in the atmosphere. In Horsham district, these emissions arise from a range of sources, including homes, businesses and transport. Climate change will

impact the district in a number of ways including drought, flooding and an increase in the number of heatwave events. These impacts have the potential to affect business and public health” (Paragraph 10.1).

“The development of renewable and low carbon energy is a key means of reducing the district's contribution to climate change” (Paragraph 10.6).

“Horsham District Council is committed to reducing CO2 emissions by 26% by 2020 and 80% by 2050 to meet the commitments set out in the ‘Acting Together on Climate Change Strategy, 2009. The need to mitigate and adapt to climate change is therefore a key objective of this plan” (Paragraph 10.2).

1.3 Although, surprisingly, the applicant’s Design and Access Statement takes no account of Climate Change, the application bundle includes an ‘Energy and Sustainability Statement’ (ESS) for the scheme.

1.4 In the ESS, the maximum CO2 emissions permitted for the scheme, to comply with Approved Document Part L of Buildings Regulations 2013 (ADL 2013), is calculated as 213,227 kg/CO2 per annum. This figure is variously referred to in the ESS as the ‘Target Emission Rate’, the ‘base-line energy demand’ and ‘Energy Standard’ for the scheme (page 10, paragraph 5.2).

1.4.1 Measures and technologies to avoid exceeding the maximum CO2 emissions permitted for the scheme are considered and assessed, specifically a design and ‘fabric first approach’ to reduce energy demand (pages 11 to 15), and low-carbon and renewable energy supply systems: wind turbines, solar photovoltaics, solar thermal, air source heat pumps (aerothermal), ground source heat pumps (geothermal) and biomass boilers (pages 16 to 22).

1.5 The appraisal concluded that of the low-carbon and renewable energy supply systems considered only solar voltaics and solar thermal were identified as being a technically viable and feasible option for the development (page 23, paragraph 5.7, Table 6).

1.5.1 Notwithstanding this finding, the ESS advises that

“The Applicant recognises the benefits of a fabric-first approach, where the lifetime energy consumption of a building is the priority solution for the development and has invested significantly in fabric efficiency in order to meet the energy standard as required by Horsham District Council. This has led to an enhancement over the Part L 2013 baseline. The applicant has therefore opted not to install any renewable energy technologies” (page 23, paragraph 5.7).

1.6 **The ESS seems to suggest that for the application it is a choice between reducing the scheme’s carbon footprint, either by means of fabric-first demand-reduction measures or by meeting residents’ requirements for electric power, at least in part, by means of solar panels** (page 12, paragraph 4.1, page 15, paragraph 5.1).

1.6.1 Note that not only will electricity be needed in each home for lighting and household appliances and devices, but it will also be needed for charging electric vehicles. The ‘Transport Statement’ for the scheme advises that

Paragraph 4.14 *“Each garage will be equipped with cabling for an electric vehicle (EV) charging point. Two communal charging points will be provided in Phase 5, next to visitor parking spaces”.*

Paragraph 6.4 sixth bullet *“Each garage will be equipped with cabling for a trickle charging point for electric vehicles”.*

1.7 Accordingly, it would seem that solar panels as well as fabric-first demand-reduction measures will be needed to reduce and minimise the schemes carbon footprint – and in so doing contribute to reducing and minimising Horsham District’s contribution to Climate Change.

1.8 Surely, the level of reductions that can be achieved is not constrained by the calculated ‘Part L 2013 baseline’ figure for the scheme? Clarification would be helpful.

1.8.1 After all, following the Government’s commitment in June 2019 to a new emissions reduction target of net zero by 2050, the Committee on Climate Change advised in its ‘Reducing UK Emissions 2019 Progress Report to Parliament’, July 2019, that *“As the existing carbon budgets were set on a cost-effective path to achieving an 80% reduction in UK greenhouse gas emissions by 2050, a more ambitious long-term target is likely to require outperformance of the carbon budgets legislated to date”.*

ECOLOGY AND BIODIVERSITY

2. It would appear that the site has not been surveyed for wild birds. Consequently whether Red List (birds of high conservation concern) or Amber List (birds of moderate conservation concern) breed, nest, forage, hunt, or visit the site has not been determined, and measures needed to protect and mitigate the impacts of the scheme on wild birds have not been considered.

<https://www.gov.uk/guidance/wild-birds-surveys-and-mitigation-for-development-projects>

2.1 The application bundle includes an ecological assessment - ‘Land West of Worthing Road, Southwater Phase 5 Ecological Assessment’ dated November 2019.

2.1.1 It is explained in the ‘Assessment’:

Paragraph 1.1.1 *“The Site had previously formed Phase 5 of BHS’s wider Land West of Southwater development which received outline planning permission for residential development (Ref: DC/14/0590). However, BHS are now pursuing a new full application for the erection of 80 dwellings with associated access, parking and landscaping works which will form part of the wider Ecological Mitigation Area. Therefore, there is a need to re-assess the ecological implication of the proposal as some time has lapsed since the previous ecological assessment of the Site undertaken as part of the outline application”.*

Paragraph 1.1.2 *“To this end a suite of ecological surveys, including an Extended Phase 1 survey, badger survey, reptile survey and bat assessment were undertaken across the Site between March and September 2019, to ensure the current proposal is informed by up to date ecological information”.*

2.2 Surprisingly, and contrary to Natural England’s Standing Advice, the ‘suite of ecological surveys’ does NOT include, and is therefore not informed by a wild bird survey, even though site is enclosed with hedgerows, which the

Ecological Assessment advises are “Perhaps the most significant ecological features within the Site” (paragraph 5.2.4).

2.3 The Ecological Assessment advises at paragraph 5.1.6 that *“indications of conservation status for individual species are provided by reference to the Red Data Book system, the Vascular Plant Red Data List for Great Britain (Cheffings and Farrell 2006) or for birds by reference to the Birds of Conservation Concern (Eaton et al. 2015) This divides birds into three lists; Red List (birds of high conservation concern), Amber List (birds of moderate conservation concern) and Green List (not of conservation concern)”*.

(See ‘Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and the Isle of Man’)

2.4 **However not withstanding this advice, whether Birds of Conservation Concern, Red List (birds of high conservation concern) or Amber List (birds of moderate conservation concern) breed, nest, forage, hunt, or visit the site has not been determined and measures needed to protect and mitigate the impacts of the development on wild birds have not been considered. This is an unfortunate and troubling omission – and should be challenged.**

3. Mitigation and Enhancement: other omissions and questions arising:

3.0.1 **With regards to mitigation and enhancement for reptiles neither the Ecology Assessment, nor the DAS, indicates any intent to provide reptiles with habitat piles/hibernacula. This omission is troubling.**

3.0.2 **Similarly, there is no stated intent to create habitats for invertebrates, including, for example, ‘beetle banks’,** indeed it would appear that the site, notably the hedgerows, has not been surveyed for invertebrates. Therefore whether priority species are present has not been determined.

3.0.3 **It would appear, too, from the ‘Ecological Assessment’ and DAS that no consideration has been given to providing the scheme with bat roosts and bird boxes designed into buildings.**

(See for example the Wildlife Trusts’ ‘Homes for people and wildlife- How to build housing in a nature-friendly way – protecting wildlife for the future’)

3.0.4 **How the scheme’s mitigation and enhancement areas are to be managed in order to maintain their viability as habitats for flora and fauna is not explained. An explanation would be helpful.**

3.0.5 **What measures, if any, will be implemented to avoid or minimise adverse impacts on the scheme’s mitigation and enhancement areas?**
Note that the ‘pressures on nature’ identified in the ‘State of Nature 2019’, include

“Recreational use, particularly in woodland close to urban areas, has detrimental impacts on soils, invertebrates and flora through trampling and

compression. Disturbance associated with an increasing variety of leisure activities adversely affects wildlife, including birds and mammals”.

3.0.6 Interpretation panels to help people understand the needs of wildlife and the environment would probably be beneficial. (see for example the Wildlife Trusts’ ‘Homes for people and wildlife- How to build housing in a nature-friendly way – protecting wildlife for the future’).

3.0.7 The ‘Ecological Assessment’ under the heading ‘Ecological Enhancements’ advises that:

Paragraph 6.2.1 *“The south and south western part of the Site will be given over to an ecological mitigation and enhancement area, that connects with the existing mitigation area to the north west and the proposed mitigation area to the south east; together these areas provide the biodiversity mitigation and enhancement for the whole of the wider Land West of Southwater development. Within the Phase 5 mitigation area, additional tree and scrub planting will be undertaken, creating a wider green corridor along the western boundary of the whole development. A species rich woodland mix will be sown under and around the new scrub and tree planting, which will grade into a species rich meadow mix”.*

Paragraph 6.2.3 *“Full details of the habitat creation are presented within the Design and Access Statement submitted with this application”.*

3.0.8 An explanation of how the intended plantings would, could or might benefit biodiversity, e.g. wildlife, including birds, mammals, invertebrates, reptiles and amphibians, would have been helpful – and reassuring, had it been provided. An explanation should be provided.

3.0.9 Some details of the intended ‘habitat creation’, including the ‘Ecological Mitigation Trees’ chosen by the applicant for planting, are given in the DAS (section 6: Landscaping at paragraphs 6.1, 6.2, 6.3, 6.6, 6.8).

3.0.10 For the purposes of mitigation and enhancement one would expect that tree species selected for planting would comprise native species that grow locally in woodland, shaws and hedgerows, such as Pedunculate Oak, Field Maple, Ash, Hazel, Service, Hornbeam, Silver Birch, Crab Apple, Wild Pear, Wild Cherry, Yew, Common Beech, Hawthorn, Blackthorn, Holly, Dog Wood, and, less frequently, Small-Leaved Lime. These trees and their fruit/seeds and the habitats that they provide for invertebrates attract and provide much needed sustenance for wild birds.

3.0.11 However, for the purposes of ‘Ecological Mitigation’, the applicant has selected only Field Maple, Silver Birch, Downy Birch, Pedunculate Oak, Rowan Mountain Ash and Small Leaved Lime. The planting of Rowan Mountain Ash for the purposes of ‘Ecological Mitigation’ at the site is questionable, likewise Downy Birch.

3.0.12 Confirmation is needed that the ‘species rich woodland mix’, which is to be “*sown under and around the new scrub and tree planting*” will comprise species that actually grow in local woodland, notably Wood Anemone, Primrose, Bluebell (NOT the Spanish variety), Wild Daffodil, Sweet Violet, Common Dog Violet and Foxglove.

CPRE Sussex asks that the issues and concerns here raised are considered and taken in to account and addressed in the determination of this application.

Yours faithfully,



Trustee CPRE Sussex

Copy to Director CPRE Sussex