

Objection:

Loss and deterioration to Ancient Woodland (AW) (NPPF 193)

- Drainage remains proposed through AW and AW buffer, contrary to NPPF 193. This was primarily the reason for the dismissed appeal under DC/24/0848 (Land to the East of Rowhook Road).
- Correspondence from Devine Homes, dated 19th June, claims that the scheme is different as the proposed run is lower in depth, but it is in principle, the same. The Inspector highlights disturbance as a result of 'comings and goings of workers' and maintenance - this will be no different for this proposal to construct and maintain the sandbag headwall.
- The sandbag headwall still requires excavation of AW soils.
- As the inspector says under points 36-42, disturbance and deterioration cannot be guaranteed to the AW soils, surface growth, plants, root and mycelial network, and importantly, the hydrological system. Impact to the latter has not been demonstrated.
- Devine Homes state that the likelihood of blockage or structural failure is low, however it is not completely absent. The lifespan of the pipe itself has a 100+ year lifespan which isn't long considering AW itself is at minimum 400-500 years old.
- The inspector also noted that 'wholly exceptional reasons' for disturbing AW were extremely rare, such as nationally significant infrastructure projects.
- AW is also deteriorated by increasing levels of light pollution, as set out in government guidance

Urban development within a protected national landscape (NPPF 190, DP16, EG1)

- This development does not meet the exceptional tests that would justify its location within the HWNL.
- Proposals do not demonstrate that they conserve or enhance natural beauty.
- Proposals do not meet objectives of the HWNL Management Plan.
- The concerns raised by the High Weald Joint Advisory Committee should be afforded significant material weight.

Location within a dark sky sensitive area (Planning Technical Advice Note, DP29)

- The HWNL Dark Skies Planning Advice states that developments should be located away from dark sky sensitive areas, avoiding AW in particular.

Substantial adverse landscape effects, as concluded by the LVIA (DP6, DP12, DP15, DP16)

- See my previous comments, but to reiterate one point, the site is not visually contained due to its topography.

No formal open space provision (DP24)

- The 'informal space' adjacent to the affordable housing frontage is not sufficient in scale or design to serve the development