

Mr Jason Hawkes Horsham District Council Parkside Chart Way Horsham West Sussex RH12 1RL

Our ref: PL00790022

5 October 2022

Dear Mr Hawkes

## Re: HORSHAM GOLF COURSE ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT

Thank you for your letter of 15 September 2022 consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We therefore agree with the conclusion that both built heritage and archaeological topics are to be scoped into the EIA.

We do not agree however that individual built heritage assets should be scoped out of the assessment at this stage (Built Heritage Baseline Assessment, pg 14) as the details of the proposed development are not yet at a stage as to determine the full potential for impacts on their significance.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (<a href="https://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>) and relevant local authority staff.



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We would strongly recommend that you involve the Conservation Officer of Horsham District Council and the archaeological staff at West Sussex County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We have concerns regarding the decision to use only a 500m study area for the assessment of designated heritage assets. Given the scale of the proposed development, we would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Christina Reade Inspector of Ancient Monuments



