

Mary Mescall
BY EMAIL ONLY

Our ref: EIA/25/0008
Your ref:

Date 27/01/2026

Dear Mary Mescall,

**Request for EIA Scoping Opinion for the proposed development at Land at 521985
116824 Wantley Hill Estate Henfield**

This letter forms the Scoping Opinion issued by Horsham District Council (hereby 'HDC') in response to your request for a formal Scoping Opinion for the Proposed Development at Land at 521985 116824 Wantley Hill Estate. It is based on the information submitted to date and will be placed on the public register.

First and foremost, HDC challenges the appropriateness of the identified technical topics presented in the submitted EIA Scoping Report to be 'scoped out' of the EIA and not reported in the ES. It is noted what has been submitted is an initial scope, and the scope will be updated as and when changes are made, and more information is available. However, HDC is being formally asked for a Scoping Opinion without evidence base documents being submitted alongside the EIA scoping report.

Given the lack of detail provided to support the present conclusions made in the submission Scoping Report with regards to significant effects, HDC cannot yet agree the scoping out of all the proposed topic areas. It is acknowledged that 're-scoping' will continue as the design of the proposed development and strategy are refined, plans and principles developed, and additional technical work is completed.

Based on the evidence presented to date, for reasons set out in the **ASPECT BASED SCOPING TABLES** in our response, we would expect the following topics to be **screened in** (in addition to those technical topics proposed to be 'scoped in' as per Chapters 6 – 8 of the submitted EIA Scoping Report): namely-

- Archaeology and Built Heritage
- Air Quality
- Odour
- Ground Conditions and Contamination
- Noise and Vibration
- Biodiversity

- Transport and Accessibility
- Water Resources
- Landscape and Views
- Socio-economics and Human Health

Description of the Proposed Development

The Applicant's description of the Proposed Development, its location and details (where relevant) is provided at Chapter 4 of the Applicant's Scoping Report.

Horsham District Council (HDC) comments: The Environmental Statement (ES) should provide a full description of the nature and scope of these activities, including the types of activity, their frequency, and how works will be carried out for all elements of the Proposed Development.

Environment Statement (ES) Approach

HDC following comments are on the scope and level of detail of information to be provided in the Applicant's Environmental Statement (ES). Aspects/Matters should not be scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by HDC.

HDC has set out in this Opinion where it has/ has not agreed to scope out certain Aspects/Matters based on the information made available to HDC at this time. HDC is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach.

In fact, this approach is strongly advocated given the quantity of evidence not submitted to date (the Scoping Report alone being submitted for a formal screening).

HDC has made effort to ensure that this Scoping Opinion is informed through effective consultation with the relevant consultation bodies. Unfortunately, currently HDC is not in receipt of all consultation responses. The full comments of the consultee responses received to date are attached, with the full list of consultations undertaken set out [Appendix 1]. No third-party representations have been received.

HDC considers that the Applicant should make effort to ensure that they engage effectively with consultation bodies and where necessary further develop the scope of the ES to address their concerns and advice. The ES should include information to demonstrate how such further engagement has been undertaken and how it has influenced the scope of the assessments reported in the ES.

Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects, is secured through planning conditions or

obligations (or other suitably robust methods) and whether relevant consultation bodies agree on the adequacy of the measures proposed.

Scope of Assessment

General

The Applicant's overarching approach to the assessment is set out in detail in Chapter 2 (EIA Methodology) of the Scoping Report.

HDC recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (e.g. a planning condition);
- to describe any remedial measures that are identified as being necessary following monitoring; and
- to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

Baseline Scenario

The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort based on the availability of environmental information and scientific knowledge.

The concept of 'future baseline' conditions is introduced in the context of several aspect chapters (e.g. traffic, landscape, air quality and ecology). Considering the number of ongoing developments within the vicinity of the Proposed Development application site, and potential evolution of the environment prior to construction and operation of the Proposed Development, the Applicant should clearly define their overarching approach to the prediction of future baseline conditions against the project programme.

Some aspect chapters of the Scoping Report have identified specific receptors, whereas others identify broad categories of receptors only. Specific receptors should be clearly identified within the ES, alongside categorisation of their sensitivity and value.

The Scoping Report explains the generic approach to defining receptor sensitivity to assess the potential impacts upon each receptor. HDC expects a transparent and reasoned

approach to be applied to assigning receptor sensitivity to be defined and applied across the aspect chapters.

Forecasting Methods or Evidence

The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.

HDC expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.

The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved. The approach to assessing and interpreting significance levels should be consistent across aspect chapters where possible. Where matrices are used in combining magnitude of impact and sensitivity of receptor, they too should be consistent in the determining overall significance. The ES should clearly explain where and how professional judgement has been applied in assessing the significance of effects.

The ES should be clear as to the potential construction programme options where the installation of all onshore cables may not occur in a single operation.

Residues and Emissions

The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation and Monitoring

Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific planning conditions or other legally binding agreements.

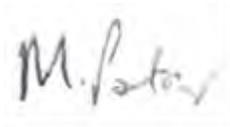
The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

The ES should clearly demonstrate how the Applicant has had regard to the mitigation hierarchy, for example by considering the avoidance of key receptors. HDC also notes certain commitments that have already been identified by the project team for the purpose of mitigating potential effects of the Proposed Development. Many of those measures are in the form of management or mitigation plans or other documents. Whilst this approach is generally welcomed and the principles of how the measures listed would likely be beneficial in terms of environmental effects understood, limited detail is provided as to the content of the management and mitigation plans that are listed. It is therefore difficult for HDC to gain confidence as to the likely efficacy of such plans at this stage. The ES should therefore set out these plans (or the reliance placed on them) in sufficient detail to understand the significance of residual effects. This should also include identification of any monitoring and remedial actions (if relevant) if predicted residual effects differ to actual monitored outcomes

The ES should also identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions within the framework of the commitments register and other mitigation measures.

ASPECT BASED SCOPING TABLES are set out overleaf.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Porter', enclosed in a thin black rectangular border.

Matthew Porter

Principal Planning Officer

APPENDIX 1 Consultee List

Responses received:

Historic England

Active Travel England

Sport England

Environment Agency

South Downs National Park

Southern Water

Sussex Police (Local Policing Service Improvement and Engagement Department)

West Sussex County Council (WSCC) Local Highway Authority

WSCC Planning Minerals and Waste

WSCC Education Services

WSCC Local Lead Flood Authority

HDC Consultant Ecologist

HDC Landscape Architect

HDC Environmental Health (Noise, Pollution, Air Quality)

HDC Tree Officer

HDC Business Development Officer

HDC BNG Ecologist

HDC Archaeological Consultant (Surrey County Council)

HDC Design & Conservation Officer

Awaited/ No response received:

Natural England

UK Power Network

Department of Culture, Media and Sport

Joint Committee of The National Amenity Societies

NHS West Sussex Clinical Commissioning Group

Southern Gas Networks

District Newt Licensing (NatureSpace)

WSCC Public Right of Way

WCC Social Care and Health

WSCC Libraries

WSCC Community Crime Prevention Department

WSCC County Fire Officer

WSSC Community Safety

HDC Strategic and Community Planning

HDC Housing Department

HDC Leisure, Parks & Communities

HDC Environment Management, Waste and Cleansing

HDC Agricultural Consultant (Reading Agricultural Consultants)