

Item	Chapter	HDC comments
1.	1. Introduction	It would be useful if the scoping report had an executive summary.
	1.7	HDC would like to it understood how local communities within the Scoping Boundary have been consulted upon to help provide local input.
	2. EIA Methodology	
		<p>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 the suite of evidence base documents referenced in the scope as the baseline assessment being submitted alongside the EIA scoping report.</p> <p>Given the lack of detail provided which underpins the technical assessments have been based to support the present conclusions made, with regards to significant effects, HDC cannot yet agree the scoping out of the 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.</p>
2.	2.5	It would be useful to show the relevant Scoping Boundary (study areas of each topic) on a map as Appendix. For instance, the zone of influence is not specified. The initial ZOI for Biodiversity is generally set at 2km (excluding for statutory designated sites). The Impact Risk Zones for SSSI’s should be considered.
3.	2.19	Whilst it is helpful to have all mitigation identified within the EIA process collected together in a one place (the Environmental Management Plan (EMP)) detail, it also needs to be clearly presented within each of the topic area chapters and measurable, particularly if it is relied on for the purposes of presenting the residual impacts within the assessment.
4.	Appendix 1: Preliminary Environmental Management Plan	<p>The EIA should focus on mitigation and compensation to be provided, and this needs to both be clearly presented in the ES and measurable. The ES should clearly demonstrate how the Applicant has had regard to the mitigation hierarchy, for example by considering the avoidance of key receptors. In this regard, it is acknowledged it is set out the Applicant’s proposed approach to setting out avoidance, best practice and design commitments.</p> <p>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, and many of the matters included are suffixed by statements such as “where possible” or “as far as practicable”. It is therefore difficult for HDC to gain</p>

		<p>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 so as to understand the significance of residual effects. This should also include identification of any monitoring and remedial actions (if relevant) in the event that predicted residual effects differ to actual monitored outcomes.</p> <p>With that in mind, HDC advocates far greater precision and detail of clarity to the precise measures being identified in in the EMP. At minimum, the EMP needs to cross reference later chapters in the ES where these measures are set out in greater detail for ease of reference, but more significantly, HDC's strong expectation is for further refinement of each of these measures be provided, in order to present measurable certainty to delivery of outcomes.</p> <p>For example, HDC requests substitution of 'wherever possible' and 'where practical' with more robust commitment. As previously identified, HDC advocates greater precision and detail of clarity to the precise measures identified. 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.</p> <p>Once the above is fully actioned, the EMP could potentially be somewhat unwieldy document (especially for the public and consultees to extract relevant mitigations), which makes it more important still to have the EMP mitigations summarised and cross referenced within each of the topic area chapters.</p> <p><i>Setting of the South Downs National Park</i> The setting of the South Downs National Park is a constraint that is not identified in the Scoping Report, despite this being a constraint that cuts across multiple topic areas, in particular landscape and views, ecology/biodiversity, and socio-economic.</p> <p>Section 245 of the Levelling-Up and Regeneration Act 2023 (S.245 duty) amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to 'seek to further the specified purposes of Protected Landscapes'.</p>
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2.	3. Site Context	<p>Reference should be made to:</p> <ul style="list-style-type: none"> • Characteristics of settlement of Henfield (Socio-economic, transport) to be included. • Minerals resource safeguarding areas applying to the site (re: The WSCC Minerals Local Plan). The application site covers an area of approximately 37.54ha and is located within the Weald Clay (brick clay) Mineral Safeguarding Area. This constraint is not identified. • Distance from the South Downs National Park should be identified. The study area falls within its setting. This constraint is not identified. • Historic Environment Record not identified. <p>Following designated heritage assets not identified: Henfield Conservation Area is located to the southwest of the site. Several Grade II listed buildings lie outside of the conservation area in proximity to the site, these include the Grade II Eastern Terrace (NHLE ref. 1286615) c.177. to the southwest of the site and the Grade II Backsettown (NHLE ref. 1027392) located to the south of the site.</p> <p>Whilst it is agreed that the site itself is not subject to any local designations, the Henfield Common Local Wildlife Site (LWS) is located approximately 800m to the south of the site and is therefore expected to be included within the scope. Within approximately 1.3km also lies the Broadmare Common LWS.</p>
3.	4. Description of the Proposed Development	<p>The 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. This includes the construction phase, not just operational phase.</p> <p>The Description of the Proposed Development should be updated as the details of the project scope is worked up.</p>

<p>4.</p>	<p>5. Environmental Factors Scoped Out</p>	<p>It is stated in the scoping report that several areas do not require their own chapter. However, HDC is being formally asked for a Scoping Opinion without the suite of evidence base documents referenced in the scope as the baseline assessment being submitted alongside the EIA scoping report.</p> <p>It is therefore unable to agree that all of these are scoped out at the time of this response.</p> <p>However HDC can confirm the following:-</p> <p><u>Climate Change</u> – HDC accept this does not need its own chapter, provided a clear and robust assessment for all relevant receptors is included in the relevant topic technical chapter. This should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate relevant to the technical topic (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the technical topic to climate change. This should build upon best practice and use the assessment of other relevant chapters (such as landscape and ecology including habitats, species, and natural processes, water resources) to describe how these factors may lead to embedded climate change mitigation measures; for instance, assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change. This should include impacts on the vulnerability or resilience of any natural feature (i.e. what’s already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation, should be considered.</p> <p><u>Risk of Major Accidents and/or Disasters</u>- HDC agrees this does not need its own chapter and should be assessed in relevant topic chapters. It should assess the likely risks to the project in relation to potential areas of vulnerability.</p> <p><u>Artificial Lighting</u> - HDC accept this does not need its own chapter, as long as a clear and robust assessment for all relevant receptors is included in the relevant topic technical chapter, particularly relating to ecology. HDC would wish to see construction phase lighting directed downward and not pointed in the direction of any close by receptors. Lighting should be turned off and retracted when not needed. Passive infrared sensor (PIR) activated lighting should be installed where safe to do so. HDC would want to see reference to this in the ES. With regards to the operational lighting requirements,</p>
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		<p>good lighting practice in accordance with the recommendations of the Institute of Lighting Professionals (ILP) and Society for Light and Lighting (CIBSE) as well as the Bat Conservation Trust should be referenced.</p> <p><u>Waste</u> – HDC accept this does not need its own chapter provided it is seen that there is reference to key principles for how waste and resources will be managed, along with how will adopt good construction and management practices to ensure waste is minimised as far as possible, in the relevant topic technical chapter. The applicant should demonstrate that the proposal should not prevent or prejudice the continued operations of the safeguarded waste site, as per Policy W2 of the West Sussex Waste Local Plan 2014. The applicant should demonstrate mitigation by way of control doc - a Waste Infrastructure Safeguarding Assessment as appropriate.</p>
	<p>Archaeology and Built Heritage</p>	<p>HDC disagree to Scoping Out based on the evidence presented to date.</p> <p>The HDC Conservation Officer is satisfied that in terms of impact to the setting of those neighbouring designated assets identified at paragraph 5.4, can be scoped out. However, other designated assets are not identified at paragraph 5.14. Henfield Conservation Area is located to the southwest of the site. Several Grade II listed buildings lie outside of the conservation area in proximity to the site, these include the Grade II Eastern Terrace (NHLE ref. 1286615) c.177. to the southwest of the site and the Grade II Backsettown (NHLE ref. 1027392) located to the south of the site. These assets are not identified at paragraph 5.14 (The Lodge at Chestham Park, Grade II, 300m to the north; and • Wantley Manor, Grade II*, 450m south-west).</p> <p>The application area is well over the 0.5ha area that would require the results of a search of the West Sussex Historic Environment Record to be provided. The Historic Environment Record shows several assets that may survive as archaeological remains particularly related to historic outfarms. The existing field boundaries may well be ancient and these would record a historic landscape. At the very least the HER should be consulted and the records assessed on the ground to identify any non-designated or unknown heritage assets.</p> <p>The Scoping Report does not identify HER within the baseline and there is no relevant mitigation measure identified. As necessary, the HER should inform any environmental statement.</p> <p>The Scoping Report includes a short section on Archaeology that has been informed by a desk based archaeological assessment prepared by RPS as their archaeological consultants. The report notes that there are no designated archaeological assets on the site, the site is not within an Archaeological</p>

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		<p>Notification Area and has a generally low potential, although an elevated possibility for Iron Age archaeology is identified, but based on previous investigations in the vicinity any archaeological remains that may be present are likely to be of local significance and so archaeology can be scoped out of an EIA and the archaeology dealt with under the normal NPPF requirements. A suitable methodology would be a geophysical survey that will be used to identify the presence of buried archaeological remains across the site and inform the need for trial trench evaluation so enabling appropriate mitigation measures to be designed if required.</p>
	<p>Air Quality</p>	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p>Mitigation: Assessing whether a development will exceed air quality objectives is a narrow approach to evaluating environmental impact. Sussex Air's Air Quality and Emissions Mitigation Guidance for Sussex (2021) takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is noted that the air quality assessment for the referenced application (DC/24/1932) similarly relied on compliance with air quality objectives as the benchmark, rather than assessing the total emissions generated – they received similar comments.</p> <p>The proposed development is significantly larger in scale than the referenced potential development to the south of the site. As such, the assumptions underpinning the assessment may not be applicable, and the resultant effects are likely to be more substantial. There is potential for direct effects on air quality at residential dwellings and ecological receptors located adjacent to the site and roads used for accessing the site that will experience a significant change in traffic flows due to the proposed development.</p> <p>It is welcomed that the air quality section of the report acknowledges the need for an emission mitigation statement, to be prepared as specified by the Air Quality and Emissions Mitigation Guidance for Sussex (2021) document. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to or exceed the value from Emissions calculation and total calculated value of emissions' health damage cost. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes.</p>

		<p><u>Air Quality Modelling:</u> According to EPUK/IAQM guidance, a detailed air quality assessment is required where the predicted change in Annual Average Daily Traffic (AADT) exceeds 500 Light Duty Vehicle (LDV) movements. The submitted report indicates that this threshold is likely to be exceeded during the operational phase, requiring detailed modelling of emissions from the proposed development.</p> <p>The assessment should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in the report (or appendices). Please provide full statistical analyses to give full picture of the model performance. Major applications should consider supplementing local authority monitoring with own monitoring - which would help to increase model certainty and confidence in the results.</p> <p>Liaise with the planning department for information on any other schemes that should be included in a cumulative impacts scenario.</p> <p><u>Construction phase:</u> An Assessment of Dust from Demolition and Construction must be carried out, which will identify dust risk, sensitive receptors and suitable mitigation measures. As the development is being built, other receptors will be created, these should be identified and considered in the construction dust management plan.</p> <p>While the intention to submit a DMP, secured through a CEMP, is noted, monitoring should be considered as a part of this. As monitoring forms a vital part of construction, given the scale of the proposed development, the likely high number of road traffic movements generated during the construction phase, a monitoring plan should be included as a measure.</p> <p>The number of vehicle movements during the construction phase will determine the dust emission magnitude associated with any demolition, earthworks, and construction activities. Follow the guidance:</p> <ol style="list-style-type: none">a. Sussex Air (2021) Air Quality and Emissions Mitigation Guidanceb. IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sitesc. IAQM Guidance on the assessment of dust from demolition and construction <p><u>Fine Particles</u></p>
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	<p>Odour</p>	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p>Henfield sewage treatment works (STW) is located in the northern part of the site. To ensure the site is suitable for residential development any full or outline application for development on this site will therefore need to be supported by a robust odour impact assessment undertaken by a suitably competent consultant.</p> <p>The odour assessment should be undertaken in accordance with current technical guidance, in particular the IAQM: Guidance on the assessment of odour for planning and ensure that any modelling is based on the industry standard for odour of 0.6 parts per billion (ppb) of hydrogen sulphide with a 98-percentile probability. Sensitive developments that are subject to levels above this standard are likely to lead to complaints about odour from residents.</p> <p>Given there is admission in the Scoping Report to a likely objection from Southern Water and the recommended mitigation to overcome this is based on knowing and securing the extent of developable area, this should inform the future ES.</p>

	<p>Agricultural Land and Soils</p>	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p><i>Soils</i> The Scoping Report identifies as much as 49% of the site comprises best and most versatile (BMV) land. 18ha is very close to the 20ha Natural England consultation and HDC has not seen slight of the ALC survey.</p> <ul style="list-style-type: none"> • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. • The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise offsite impacts.
	<p>Ground Conditions and Contamination</p>	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p>The Scoping Report identifies Weald Clay Formation but does not identify the study area is located within the Weald Clay (brick clay) Mineral Safeguarding Area. There is no identified relevant mitigation measure. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 at the application stage and a Mineral Resource Assessment should accompany any formal submission for planning permission. As necessary, the MRA should inform any environmental statement</p> <p>Needs to be demonstrated environmental constraints data sets (Source Protection Zones; Potentially contaminated land; Safeguarded minerals and waste sites/infrastructure (those already built) used to feed into process at this stage.</p> <p>As mitigation measure, to ensure the site is suitable for residential development any full application for development on this expansion of the site will need to be supported by a robust preliminary risk</p>

		assessment (PRA), undertaken by a suitably competent, qualified and experienced environmental consultant.
	Transport and Accessibility	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p>All highways and transport related matters would be assessed as part of a transport assessment, the scope of which <u>is being</u> agreed with WSCC Highways, not yet confirmed. Supporting documents such as a Construction Management Plan would also need to be produced.</p> <p>Needs to be demonstrated environmental constraints data sets PRowS (not just Major Roads) used to feed into process at this stage. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure that is not currently identified.</p>
	Noise and Vibration	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p><u>Noise</u></p> <ol style="list-style-type: none"> 1. Certain parts of the site subject to this scoping opinion request, in particular the northern parts of the site, are located in close proximity to the A281 and the Henfield sewage treatment works. The latter is not identified within the baseline at 5.75 of the Scoping Report and it is inferred at para 5.77 that the treatment works were not included in the noise survey scope. It is also noted the noise monitoring coincided with school holidays (para 5.76) and this will be likely challenged by third party. 2. To ensure the site is suitable for residential development any full or outline application for development on this site will therefore need to be supported by a robust noise impact assessment undertaken by a suitably competent noise consultant who are members of the ANC and are accredited to the Institute of Acoustics (IOA). 3. We will also expect to see any proposed development on this site adopt good acoustic design, following the principles of ProPG Planning and Noise. This should include, but not necessary be limited to, adequate separation between proposed dwellings and both the A281 and the STW.
	Biodiversity	<p>HDC disagree to Scoping Out at current time based on the evidence presented to date.</p> <p>Protected and notable species are referenced within Section 5, however specific mention should also be made to priority species, as well as irreplaceable and priority habitats (informed by on-site survey and desk study). Note that from Defra's MAGIC mapping, the nearest pockets of irreplaceable and priority habitat are lowland mixed deciduous woodland immediately adjacent to the north-east of the site, coastal and floodplain grazing marsh approx. 250m west of the site, traditional orchards approx. 350m</p>

		<p>south-east of the site, and ancient woodland approx. 450m west of the site. However, note that the mapping is indicative. A list of priority and notable species records identified within the ZOI can be obtained from the Sussex Biodiversity Record Centre.</p> <p>A Preliminary Ecological Appraisal (PEA) has not been submitted alongside the EIA scoping report; however, it is understood that one was undertaken by CSA Environmental in 2020. Since the PEA, numerous habitat- and species- specific surveys have been carried out, however the dates of survey and associated reports have not been provided. As such, it is strongly advised that up-to-date surveys are used to support the conclusions made when reporting on all effects, and the evidence of such surveys are submitted in any forthcoming full application.</p> <p>Given that there is no detail to accompany the high-level assessment of effects, the scoping out of all important ecological features cannot yet be agreed. In the absence of such information and any additional detail on the need for further survey or assessment, the precautionary principle should be employed.</p> <p>In any forthcoming EIA, the construction, operating, and maintenance (and where relevant closure and decommissioning) activities that may generate ecological effects should be applied to each individual ecological feature, and the impacts should be categorised by extent, magnitude, duration, reversibility, timing and frequency, where appropriate, and detail how the baseline will change (if at all) taking into consideration other environmental aspects where necessary. At present, the EIA scoping report refers to 'species-specific measures' for mitigation and compensation. These measures should be listed for each individual feature addressing each impact prior to a final assessment of residual impact and the need for further consideration. This is requested to provide transparency and evidence a systematic approach to assessment, as per CIEEM EclA Guidelines (2024).</p> <p>In addition, positive impacts should also be assessed, and it is strongly encouraged that biodiversity enhancements align with the West Sussex LNRS priorities and measures within the Wilder Horsham District Nature Recovery Network.</p> <p><u>Habitat impacts</u></p> <p>With regards to the assessment upon habitats on-site, it is noted that Section 5.88 states 'Mitigation to be incorporated into the Proposed Development includes retention of woodland, hedgerows and trees within the development parameter plans', immediately followed by 'unless where required for access or other infrastructure requirements'. The extent of vegetation removal is therefore not yet known, and the</p>
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		<p>effects cannot be certain. Section 5.90 then refers to removal of hedgerows, treelines and woodland as ‘minor losses’ for vehicular and pedestrian access, and these impacts are therefore not considered significant. This is not yet agreed, given the uncertainty with regards to scale. It is also noted that the PEA identified that the site ‘comprises predominantly modified grassland, lowland mixed deciduous woodland, other neutral grassland, scrub, hedgerows, ditches and scattered trees’ and ‘the north-west of the site is bounded by Chess Stream’ (otherwise known as Cutlers Brook – a statutory main river as per Environment Agency mapping). At least one of these on-site habitats are considered priority habitats, and therefore national and local policy consequences should be considered when assessing effects. In any case, any acceptable losses of habitat on-site should be compensated for as referred to in Section 5.90 (although the degree of compensation is yet to be determined), and general mitigation within a CEMP would be required for all retained habitats (as stated in Section 5.89 – as before, detailed mitigation measures should be applied to each individual feature in the EIA).</p> <p>Any forecast impacts on the watercourse should also review impacts on protected/priority/notable species (fish, crayfish, etc) and downstream impacts on irreplaceable/priority habitats and designated sites.</p> <p>As previously referred, the Cutlers Brook (a designated main river) runs along the northern boundary of the site. We note that the report specifies that watercourse units will be delivered as part of the biodiversity net gain requirements (paragraph 5.92). HDC strongly encourage suitable assessment and delivery of river restoration and river habitat enhancement as part of the proposed development. As mitigation measure, there should be a suitable buffer between the river bank and any built development to allow for the natural flow of the river, and to deliver water quality benefits.</p> <p>The addition of new culverts for any river crossings (if these are necessary) is unlikely to be suitable, with clear span bridges being preferable where possible. The Planning Practice Guidance for Flood risk and coastal change (paragraph 067) says:</p> <p><i>“Proposals to introduce new culverting or to build on top of existing culverting are likely to have adverse impacts on flood risk, ecology, human health and safety and amenity whilst increasing maintenance costs and hindering future options to restore the watercourse. Such proposals are likely to run contrary to natural flood management objectives and the objectives of River Basin Management Plans.”</i></p> <p>The South East River Basin Management Plan is a key over-arching source of information on the water environment, including the condition of water bodies and measures to help meet the objectives of the</p>
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		<p>Water Environment Regulations 2017. This should be evidenced to have been used to help inform assessments and plans for net gain proposals.</p> <p><u>Species impacts</u> Reference is not made to all species that have been surveyed for, as listed in Section 5.87. Therefore, it is not clear as to whether some species have been found to be present on-site, and for those that are, the importance of that species' population within a site, local, regional or national context, and thus the baseline is not clear. As such, it is not yet understood if the brief examples of species mitigation are adequate, and whether the implications of effects are in accordance with planning policies and legislation. If any communal bat roosts are identified, and in the absence of any information confirming the extent of the commuting and foraging habitats being utilised by the bats, the core sustenance zones for the species as per BCT guidance should be considered.</p> <p>In addition, Section 5.91 mentions habitat suitable for ground nesting birds (e.g., skylark) will be provided alongside informal open space to compensate for lost breeding territories. The compensation will need to be carefully considered, and if possible separated from pedestrian and vehicular access to reduce effects of disturbance throughout all stages of development. It is noted that the Applicant owns land adjacent to the site boundary, totalling 5.86ha, whereby this land could be used for such measures.</p> <p>In any forthcoming application, alternative locations or layouts and the mitigation hierarchy to firstly avoid and then reduce impacts should be undertaken. Where necessary, justification for the location/layout should be provided when a resulting significant impact is identified. The description of mitigation, compensation and enhancement measures within the EIA must be sufficient to allow HDC and relevant stakeholders to see clearly how effects will be addressed and must be detailed in an Environmental Management Plan (EMP) or similar.</p>
	<p>Topics scoped into the ES</p>	
	<p>6. Water Resources</p>	<p>HDC agrees to Scoping In.</p> <p>Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage. It is suggested the proposed masterplan is overlaid with the Flood Zones and Surface Water Flood Risk mapping, to demonstrate how the sequential approach has been used.</p> <p>As mitigation measure, it is proposed to manage the surface water using swales and attenuation basins (with some permanently wet and some dry). HDC are supportive of the use of open SuDS</p>

		<p>features, as this follows the NSfS. Appropriate easements for the swales and basins will need to be considered, as this could have impacts on the parameter plan. Following experience with other sites, HDC suggest making it clear on all necessary drawings which basins will be permanently wet and dry. Given the size of the site, there may be opportunities to use SuDS for multi-functional purposes (such as education and recreation/amenity).</p> <p>The effects of climate change on surface water flood risk need to be considered.</p>
	<p>7. Landscape and Views (and LVIA Viewpoints)</p>	<p>HDC agrees to Scoping In.</p> <p>Appendix 3, the baseline assessment, has not been attached and cannot provide detailed comments. Nevertheless, the principles of the outline methodology embedded within the document are sound.</p> <p>In regard to the scoped assessment, in addition to the National and District level character areas, please include the County Council landscape guidance tier as well as the Horsham District Landscape Capacity Assessment (2021).</p> <p>Table 7.1 Landscape Receptors should also include individual landscape elements in addition to 'Site and local landscape character'.</p> <p>To be able to confirm and agree proposed viewpoint locations, as well as extent of study area (beyond the suggested 750m), please provide an accompanying ZTV prior to submission.</p> <p>Type 3 visualisations, in accordance with TGN 06/19 Visual Representation of development proposals, are expected to be provided to illustrate the level of change proposed and any mitigation measures.</p> <p>The report states that photographs will be taken of key views when vegetation is both in and out of leaf <i>if timescales permit</i>. We strongly recommend that the LVIA is accompanied by winter photographs, as this will represent the worst-case scenario which is critical to understanding the full extent of visual effects.</p> <p>Cumulative landscape and visual effects must also be assessed. This includes setting impact on the South Downs National Park.</p>

	<p>8. Socioeconomics and Human Health</p>	<p>HDC agrees to be Scoped in.</p> <p>Needs to be demonstrated environmental constraints data set PRoWs (not just national trails) used to feed into process at this stage.</p> <p>HDC expects following elements to be demonstrated to have been considered:</p> <ul style="list-style-type: none"> i) Socio-economic impacts of proposed traffic generation, traffic future growth, PRoW management at crossings and the likely requirements for possible road closures and temporary traffic lights. iii) Increased expenditure of the public purse to address increased recreational user pressure on South Downs National Park, Sussex Wildlife Trust Woods Mill Nature Reserve, Henfield Common and PRoW network, and Downslink. Rights of Way Improvement Plans (ROWIP) be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure. iii) Increased pressure on local facilities and services based on recent house large-scale building in Henfield to identify. Reference to be made to Horsham District Council Infrastructure Delivery Plan. v) Impact on viability and vitality of Henfield High Street vi) Playing pitch and Sports provision (lack of) in Henfield. HDC expects this scoped in for further assessment. <p>In addressing likely significant effects of the above listed aspects, HDC considers there will be opportunities for various mitigation and compensation measures.</p> <p>The Scoping report does not address Mineral Extraction. It is noted that no mention is made within the Scoping Request to the West Sussex Joint Minerals Local Plan (2018) and specifically, Policy M9 - Safeguarding Minerals. It appears that the site sits within the brick clay safeguarding areas, so a Mineral Resource Statement would be required to assess this impact and feasibility of minerals extraction prior to development. This matter should be given due consideration as below.</p> <p>The application site is located within the Weald Clay (brick clay) Mineral Safeguarding Area. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 (Joint Minerals Local Plan 2018, partial review 2021) at the application stage and a Mineral Resource Assessment (MRA) should accompany any formal submission for planning permission. As necessary, the MRA should inform any environmental statement.</p>
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	<p>9. Approach to assessment of Cumulative Effects</p>	<p>The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure (construction and operational phases) An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):</p> <ul style="list-style-type: none"> a. existing completed projects; b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. <p>In light of the number of ongoing developments within the vicinity of the Proposed Development 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.</p> <p>The ES should identify recent house large-scale building in and around Henfield.</p> <p>Those schemes listed at Table 9.1 is insufficient.</p> <p>Even granted outline consents (or subsequent reserved matters approvals) are part of the baseline for assessing significant environmental effects, ensuring the full picture of development in an area is captured:</p> <p>DC/21/2013 Outline planning application for up to 235 dwellings, including 35% affordable housing, with an improved vehicular and pedestrian access via London Road, the provision of public open space and associated infrastructure and landscaping with all matters reserved except access.</p> <p>DC/24/1932</p>
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EIA/25/0008 Horsham District Council. Aspect Based Scoping Tables
 EIA Scoping Opinion for the Proposed Development at Land East of Henfield, West Sussex

		<p>Outline Application for development comprising up to 191 dwellings with open space, landscaping and associated infrastructure (all matters reserved except for access). New vehicle access from Charlwood Drive.</p> <p>DC/21/0908 Outline application for the construction of 51 dwellings comprising 100% affordable housing for key workers and the erection of a community centre, associated access and landscaping with all matters reserved.</p> <p>DC/24/1538 Erection of 29 dwellings with associated landscaping, open space, parking and creation of new vehicular access</p> <p>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.</p>
	Remainder of Scoping Report	No comments