



**Horsham
District
Council**

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Our ref: EIA/19/0004
Your ref: R-1620007949_3-WOI Scoping
Email: Jason.hawkes@horsham.gov.uk
Direct Line: 01403 215162
Date: 30th November 2020

Dear Mr Royal

Request for a formal Scoping Opinion for the proposed development at Land West of Ifield, Horsham

Following your email requesting a formal Scoping Opinion for the proposed development at Land West of Ifield, Horsham, please find attached a copy of the Scoping Opinion issued on behalf of Horsham District Council. The opinion incorporates the views of the statutory consultees and other departments within the Council. The comments of Crawley Borough Council, Natural England, the Environment Agency, HDC Ecologist are attached.

In addition to consultation responses, we have also received 29 emails from residents. The full comments can be viewed via our website (<https://www.horsham.gov.uk/planning>) using the ref: EIA/20/0004. Their comments are summarised as follows:

- Proposed road stops at Ifield are unacceptable.
- The environmental impacts are unacceptable.
- Base line surveys will need to be redone as the development progresses.
- The consultation so far from Homes England has been inadequate.
- Questions are raised regarding the 'Country Park' and what it will entail.
- Concern is raised over Homes England's commitment to delivering the whole of the link road.
- Impact on adjacent farmland and agricultural uses needs to be considered.
- The scheme will have a detrimental impact on traffic.
- Concern is raised regarding the loss of the golf course.
- The development is too close to the airport and results in loss of greenspace.

I confirm that this letter forms Horsham District Council's formal Scoping Opinion based on the information submitted to date and will be placed on the public register.

Yours sincerely

Jason Hawkes
Principal Planning Officer

Scoping Opinion

Chapter 1: Introduction

- Paragraph 1.1.1 states that 'the planning application for the proposed Development will be in outline with all matters reserved'. Horsham District Council (HDC) agrees with Crawley Borough Council (CBC) that there is concern that an outline application with all matters reserved would not include sufficient information and detail to be assessed. As we now understand any application would include the accesses from Charlwood Road and Rusper Road in detail, with the remaining link road in outline. This would be the absolute minimum we would likely support, noting that the overall scope of the application has not yet been agreed.

Chapter 2: Site Context

- Paragraph 2.1.3 refers to Ifield Park but its location is vague stating it is to the east. HDC agrees with CBC in that this section should include more detail on the site context. The importance of the relationship with Crawley and the amenity use of this existing countryside for Crawley Town residents needs to be stressed. The potential impact on the setting of Ifield Conservation Area also needs to be emphasised in this section.
- Reference needs to be made to the development of 95 dwellings to the north side of Rusper Road, approved under outline permission DC/14/2132, which abuts the site. This development is near completion.

Chapter 3: Description of Development

- Paragraph 3.2.2 states that the development proposal is still evolving and that full details of what the proposal will include has not been stated at this point. It is appreciated that the Homes England are looking to submit an application in 2021 and that a masterplan has not been finalised. An EIA will need to accurately state what the proposal will comprise so that its environmental impacts can be thoroughly assessed.
- Reference should also be made here to the aspirations of the site to be part of a wider scheme for up to 10,000 dwellings for the land to the west of Crawley. The land west of Ifield is the first phase of this wider development which is intended to deliver a link road joining the A264 to the south to the A23. It is important that this narrative is outlined in the EIA so that cumulative impacts can be considered where necessary.
- You should note that the land use, building height and density parameters for the development have not yet been finalised.

Chapter 4: EIA Methodology

- Paragraph 4.4.5 refers to 2020 as a 'Current baseline'. HDC agrees with CBC that 2020 has not been a typical year due to the pandemic and would not be an appropriate baseline.
- Paragraph 4.8.3: HDC agrees with CBC that the cumulative impact for developments in the surrounding area should be clearer and include smaller scale schemes approved nearby at HDC and CBC. It is noted that the development at Kilnwood Vale for up to 2500 units (plus an additional 250 on its reserved land to the west), including a neighbourhood centre and employment uses (ref: DC/10/1612) has not been included in the list of developments. This strategic site is well advanced and nearing 1,000 occupations. Reference should also be made to the approved scheme for 95 units immediately adjacent the site (ref: DC/14/2132) and the Novartis site (ref: DC/18/2687) for up to 300 units and employment uses in Horsham town. It would also be important to note the potential impact of any relevant housing allocations in the area that come forward in the Regulation 19 Horsham District Local Plan Review due to be published and consulted on in early 2021.

- Table 4.2: It is incorrect to state that ‘there are no mineral resources’ present on this site. The site is within the brick clay consultation zone under the West Sussex Mineral Local Plan. Therefore Policy 10 of the Minerals Local Plan would be applicable.
- HDC Environmental Officer has noted the proposal to scope out the land contamination as the site comprises primarily previously undeveloped land. While it is accepted the majority of the site is likely to be free from contamination, there will be isolated areas such as access tracks, hard standings and field gates where imported contaminative material may be present. This issue will need to be addressed either as part of the outline planning proposal or through a discovery strategy for each phase.
- Paragraph 4.14: The full scope of the planning application and documents to be submitted as not yet been agreed. As stated, it is important that the matters submitted with the outline are agreed and that leaving all matters reserved would not be an appropriate approach.

Chapter 5: Agriculture and Soils

- No comment.

Chapter 6: Air Quality

- HDC’s Air Quality Monitoring Officer has made the following comments:
 - HDC has adopted the Air Quality and Emissions Mitigation Guidance for Sussex (2020). The guidance takes a low-emission strategies’ approach to avoiding cumulative impacts of new development, by seeking to mitigate or offset emissions from the additional traffic and buildings. In accordance with the guidance, a damage cost calculation is required from all developments classified as ‘Major’. Applicants are required to submit a mitigation plan detailing proposed measures to mitigate and/or offset the impacts and providing itemised costing for each proposed measure, with the total estimated value of all the measures being equal to the total damage costs.
 - The Sussex Guidance seeks to avoid duplicating mitigation normally secured through other regimes, e.g. Travel Plans.
 - The impact assessment must include relevant receptors on major routes into Horsham town.
 - The impact and exposure assessments must take account of cumulative impacts on air quality – all committed residential development including the North of Horsham development, as well as all committed industrial development in the north of Horsham, including Horsham’s incinerator.
 - It is recommended that air quality mitigation includes measures to reduce emissions from domestic heating as this will help the district reduce both air pollution and carbon footprint.

Chapter 7: Biodiversity

- The comments of the HDC Ecologist and Natural England are attached.
- It is noted that further consultation is proposed to be undertaken with the WSCC tree Officer to request information on TPO’s and approach to tree survey and mitigation. In addition to this and the other consultees, the HDC tree officer must also be consulted. This would include an assessment of the site for potential Ancient Woodland.

Chapter 8: Climate Change

- Reference should be made here for the requirement of this potential strategic site to be carbon neutral. Draft policies on climate change policy under the Local Plan Review outline HDC’s approach. In the event this site is allocated for development in the Local Plan Review the site will be required to demonstrate the delivery of carbon neutrality or negativity within the development, including demonstrating a fabric first approach to the construction of built development, and maximum use of onsite renewable energy technologies.

Chapter 9: Cultural Heritage

- HDC's Archaeological Consultant has commented that the West of Ifield site has considerable potential for archaeological remains to the present. The geophysical survey and previous fieldwork both in and adjacent to the site has established the presence of archaeological remains including a probable large settlement spanning the site the period between the Late Bronze Age and the later Roman period, as well as number of other possible prehistoric / Roman enclosures.
- It is therefore recommended that the proposed Cultural Heritage Chapter in the EIA should comprise:
 - A desk-based assessment of the proposed development area – this should utilise the information available in the West Sussex Historic Environment Record and historic cartographic and documentary sources. This should include an assessment of both the historic environment sites and the historic landscape setting.
 - A re-assessment should be made of the aerial photographic evidence for the area, including the on-line digital data available on GoogleEarth. This should include rectification of both archaeological features and palaeochannels.
 - An assessment should be made of the available LiDAR data for the application site and rectified plots produced of both archaeological and historic landscape features identified.
 - If a geophysical survey is being undertaken it is recommended that a trial area is undertaken on an area of known archaeological deposits to assess its effectiveness prior to the remainder being surveyed.
 - An assessment should be made of the available borehole and BGS data for the site in order to establish the potential for palaeoenvironmental deposits within the valleys of the Mole River and the Ifield Brook.
 - An element of ground-truthing, in the form of trial-trenching, will be required to clarify the results of all of the surveys.
 - The results of the above will inform the development of a mitigation strategy for both preservation in situ and/or preservation by record where this is not possible.
- If planning permission is granted initially all those areas not previously trenched will require a programme of archaeological trial-trenching at a density of 5% (4% with a further 1% available for refining the results). This will inform the further development of the mitigation strategy.
- The HDC Conservation Officer has also commented that, from his assessment it is considered that Pockneys Farm (NHLE: 1026984) and Oak Lodge (NHLE 1180389) may be subject to potential significant change, and should also be considered.

Chapter 10: Landscape and Visual Impact

- HDC's Landscape Officer has made the following comments:
 - Ifield Conservation Area has been scoped out, however it is considered that the setting of the conservation should also be included within the landscape assessment;
 - The West Sussex Land Management Guidance and West Sussex Historic Landscape Characterisation studies should be included to the list of existing character assessments and guidance documents;
 - As part of the Landscape Character Assessment work, the following should be taken into consideration:
 - Identify any change to the Horsham District Landscape Character Areas (in the HDC landscape character assessment) and also examine the impact of development on distinctive local character areas within and immediately surrounding the development site.
 - The impact on specific landscape features should also be assessed e.g. field and boundary trees, hedges, woodlands and other historic landscape features which contribute to the landscape e.g. hedgerow/woodland banks, old country lanes, drove routes, old railway lines, etc
 - The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects on the development, such as changes in topography. Changes in characteristic views e.g. to the High Weald AONB, to local landmarks may need to be considered, etc

- Photomontages should be prepared for key viewpoints of the development - locations to be agreed with HDC. Any particularly tall elements of the development are likely to need to be shown on cross sections to understand their impact.
- The landscape and visual assessment should take account of the 'worst case scenario' in terms of winter views and also the effects of mitigation planting in year 1 of the development and after 15 years of establishment.
- The detailed design of the proposed improvements should seek to respect and enhance local character and distinctiveness, and use appropriate materials and designs in all new built features. This should reflect local design characteristics and wherever possible local materials.
- Advance planting of perimeter buffers should be considered where possible as part of the mitigation measures also during the construction stage
- Paragraph 10.3.23: Reference should be made here to the Kilnwood Vale development for up to 2,750 dwellings just south of the site (ref: DC/10/1612). It should be noted that DC/20/0470 has been refused. Reference should also be made here to the development of 95 dwellings to the north side of Rusper Road, approved under outline permission DC/14/2132, which would abut the site.

Chapter 11: Noise and Vibration:

- HDC Environmental Officer has made the following comments:
 - 11.3.13 Construction noise: Experience of the Kilnwood Vale development showed that piling works generated severe off site impacts. At one point this resulted in enforcement action by Crawley Borough Council against the developer. This emphasises that the design of the development should minimise the need for piling works where sensitive receptors are close by, either off site or within the proposed Development boundary due to phased occupation of the proposed development. It should be noted that the ongoing COVID situation with residents working from home etc has challenged that the normal model of acceptability of construction noise levels during the day.
 - Table 11.2 details construction noise limit values for night time. It should be noted that HDC does not routinely permit night time construction working and it should not be assumed that these noise limits are accepted.
 - Table 11.3 gives values for construction vibration significance thresholds. It is considered the banding for Moderate adverse impacts is too wide. As noted above, experience of the Kilnwood Vale construction phases showed significant level of complaints were received a much lower level than 10mms. The significance criteria should be revised where sensitive receptors are likely to be affected, either off site or within the proposed Development boundary due to phased occupation of the proposed development.
 - 11.3.24 Operational Plant and Commercial Development: The proposed BS4142 noise target does not consider issue of cumulative impacts of multiple new noise sources. The target should be set 5dB below background to avoid incremental increases in background noise levels.

Chapter 12: Socioeconomic Effects and Health

- HDC agrees with CBC that the one of the most significant Socio-Economic effects of this proposal will be to the residents of Crawley, especially those residents who live to the west of Crawley and currently enjoy the use of this countryside site. It will therefore be necessary to consider the impact of the development on the health and well-being of the neighbouring district of Crawley in detail.
- It is recommended that in assessing socio-economic impacts it would be beneficial to refer to the analysis of any representations as part of the Local Plan Review currently been undertaken. This is in the event that the scheme is taken forward as part of the review as a preferred site. Analysing the representations will provide an indication of the concerns of the existing communities.
- Paragraph 12.4.13: Representations received state that Rusper Golf Club is now closed.
- Table 12.2: Again, reference should be made here to the Kilnwood Vale development for up to 2,750 dwellings just south of the site (ref: DC/10/1612). It should be noted that DC/20/0470 has been refused. Reference should also be made here to the development of 95 dwellings to the north side of Rusper Road, approved under outline permission DC/14/2132, which abuts the site.

Chapter 13: Surface Water Resources and Flood Risk

- HDC Drainage Officer has commented that he is satisfied with the scope and issues raised with respect to Flood Risk and their possible effects on the project.
- The comments of the Environment Agency are attached for your information.
- Further comments have been sought from West Sussex County Council as the Flood Authority. These will be forwarded on once received.

Chapter 14: Transport:

- West Sussex County Council Highways have stated that they have no comments to make on the methodology within the EIA Scoping. As set out in the Scoping, separate discussions are progressing with WSCC regarding the assessment of transport related matters with these to be presented as part of a Transport Assessment. It's understood that the TA will then feed into the EIA. Various transport guidance documents are listed on page 144. LTN 1/20 should be added to these.
- The only other comment at this stage would be in respects of the committed developments. Both Kilnwood Vale (DC/10/1612) and the redevelopment of the former Novartis site (DC/18/2687) are missing from the list within Appendix B.

Chapter 15: Waste and Resource Management

- No comment

End