

Max Gull
BY EMAIL ONLY

Our ref: EIA/25/0006
Your ref:

Date 15/12/2025

Dear Max Gull,

Request for a formal EIA Scoping Opinion for the proposed development at Land Northwest of Southwater

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 North West of Southwater. It is based on the information submitted to date and will be placed on the public register.

Description of the Proposed Development

The Applicant's description of the Proposed Development, its location and details (where relevant) is provided in paragraph X 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 on the basis of the information available 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.

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

receipted 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

The applicant's overarching approach to the assessment is set out in detail in of the Scoping Report.

General

The Applicant's overarching approach to the assessment is set out in detail in X 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 on the basis of the availability of environmental information and scientific knowledge.

The concept of 'future baseline' conditions is introduced in the context of a number of aspect chapters (e.g. traffic, landscape, air quality and ecology). In light of the number of ongoing developments within the vicinity of the Proposed Development application site, and potential evolution of the environments 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 in order 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.

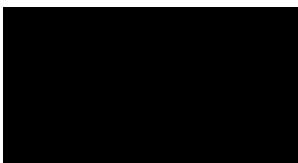
The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

The ES should clearly demonstrate how the Applicant has had regard to the mitigation hierarchy, for example by giving consideration to 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 the Inspectorate 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 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

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,



Matthew Porter

Principal Planning Officer

APPENDIX 1 Consultee List

Responses received:

Natural England

Historic England

Active Travel England

Sport England

Environment Agency

UK Power Network

District Newt Licensing (NatureSpace)

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 Local Lead Flood Authority

HDC Landscape Architect

HDC Environmental Health (Noise, Pollution, Air Quality)

HDC BNG Ecologist

HDC Agricultural Consultant (Reading Agricultural Consultants)

HDC Archaeological Consultant (Surrey County Council)

Awaited/ No response received:

Department of Culture, Media and Sport

Joint Committee of The National Amenity Societies

NHS West Sussex Clinical Commissioning Group

Southern Gas Networks

WSCC Public Right of Way

WSCC Education Services

WCC Social Care and Health

WSCC Libraries

WSSC Community Crime Prevention Department

WSSC County Fire Officer

WSSC Community Safety

HDC Design & Conservation Advisor

HDC Strategic and Community Planning

HDC Consultant Ecologist

HDC Tree Officer

HDC Housing Department

HDC Business Development Officer

HDC Leisure, Parks & Communities

HDC Environment Management, Waste and Cleansing

EIA/25/0006 Horsham District Council. Aspect Based Scoping Tables
EIA Scoping Opinion for the Proposed Development at Land Northwest of Southwater

Item	Chapter	HDC comments
1.	1. Introduction	It would be useful if the scoping report had an executive summary.
	2. 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.</p> <p>This includes the construction phase, not just operational phase.</p>
2.	2.1.2	For clarity, please align with the language used by HDC in its literature; Policy HA3 as a 'draft allocation', and the Regulation 19 plan as the 'Emerging Local Plan'.
3.	2.1.3	<p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Reference to water neutrality to be updated. Refer to HDC website https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p>
4.	2.1.6	Typo correction: 'advice' not 'advise'
5.	Section 2.2	<p>Reference should be made to:</p> <ul style="list-style-type: none"> • Southwater Country Park and Lintot Square (both important socio-economic aspects) • minerals resource safeguarding areas applying to the site (re: The WSCC Minerals Local Plan). This constraint is not identified.
6.	2.3.10 <i>building to be demolished are required to be confirmed</i>	This is far too vague and unclear to what it relates too. Flesh out for clarity.
7.	<p>2.4 EMBEDDED ENVIRONMENTAL DESIGN MEASURES Table 2-1 presents the embedded environmental design measures for the Proposed Development</p> <p><i>e.g. Natural and semi-natural habitats, including hedgerows, trees and ponds, will be retained and protected wherever possible</i></p>	<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, particularly if it is relied on for the purposes of presenting the residual impacts within the assessment.</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 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</p>

		<p>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 Table 2-1. It is appreciated that table 2-1 is summary, but at minimum, it 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 the exemplified embedded measure includes where the Proposed Development will result in the disturbance of hedgerows, trees, and ponds their removal will be kept to a practical minimum with replacements being provided and fenced off during the first planting season following construction. The substitution of 'wherever possible' with a more robust commitment should be also considered.</p>
	3. Approach to EIA	<p>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.</p> <p>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</p> <p>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.</p>
8.	<i>3.3.1 Study areas will be defined for each individual environmental factor...</i>	It would be useful to show the relevant Scoping Boundary (study areas) on a map as Appendix.

EIA/25/0006 Horsham District Council. Aspect Based Scoping Tables
EIA Scoping Opinion for the Proposed Development at Land Northwest of Southwater

9.	3.2.4. <i>The Public Participation Directive .. provides opportunities for the public to be involved in the consenting process for certain activities, through access to information, justice and consultation on key documents</i>	HDC would like to it understood how local communities within the Scoping Boundary have been consulted upon to help provide local input.
10.	3.6 APPROACH TO MITIGATION <i>The identification of mitigation measures follows the principles of avoidance where possible, reduction where avoidance cannot be achieved, or compensation where reduction cannot be achieved or would not achieve practicable levels of mitigation.</i>	<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, particularly if it is relied on for the purposes of presenting the residual impacts within the assessment.</p> <p>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>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>
11.	3.7.3. <i>The assessments of the likely significant effects for each environmental factor will take into account both the construction and operational stages of the Proposed Development as a whole, however, given the nature of the Proposed Development, the assessments will not consider specific build out stages of each stage.</i>	As the construction is likely to be phased over several years, this potential scenario will need to be assessed within the EIA.

12.	4. Environmental Factors Scoped Out	<p>With respect to the areas which are stated do not require their own chapter:</p> <p>Daylight, Sunlight and Overshadowing – HDC agree that this environmental factor would not need to be considered in the ES.</p> <p>Human Health – HDC agree 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 build upon best practice and use the assessment of other relevant chapters (such as noise, traffic, air, and water) to describe how these factors may lead to health outcomes of the local population.</p> <p>Arboriculture – 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 build upon best practice and use the assessment of other relevant chapters (such as landscape, ecology) to describe how these factors may lead to tree retention and appropriate mitigation measures (new planting), and a schedule of all surveyed Ancient/Veteran/ notable/ protected trees is included in the ES.</p> <p>Waste – HDC accept this does not need its own chapter provided it is seen that there is reference to key principles for how waste 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. HDC would expect to see reference that the northern part of the application site is within the consultation buffer zone for existing waste infrastructure (Hop Oast/Horsham Household Waste Recycling Site). 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>Major accidents and disasters – 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>Artificial Lighting - 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</p>
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		<p>would want to see reference to this in the ES. With regards to the operational lighting requirements, 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>Heat and Radiation - HDC agrees this does not need its own chapter and should be assessed in relevant topic chapters.</p>
	<p><i>4.9.1. It is suggested that Archaeology could be scoped out for the EIA as archaeological interest can be managed via standard planning control and secured and mitigated by standard planning conditions on any future grant of planning consent.</i></p>	<p>HDC disagree.</p> <p>The applicants have included a chapter on Cultural Heritage. The report confirms that cultural Heritage will be included for assessment in the forthcoming EIA but that it is proposed that archaeology will be scoped out.</p> <p>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 on the basis of the availability of environmental information and scientific knowledge.</p> <p>The site is large, and the majority of the area has not been subject to previous archaeological investigation although the southern part of the site is within an Archaeological Notification Area DWS8545 which includes evidence from a magnetic gradiometer survey that identified a number of probable archaeological features including a number of enclosures and pit alignments with some features possibly related to former kilns or hearths.</p> <p>The scoping report considers that the site has a moderate potential for deposits of earlier prehistoric, later prehistoric (Iron Age) and Romano-British date within the Site, and a low to moderate potential for deposits dating to the Anglo-Saxon and Medieval periods, but the true nature of the archaeological resource and its significance remains to be determined and so further assessment and investigations will be required.</p> <p>IHDC considers that it would be reasonable to carry out these investigations, which should include a geophysical survey of the site which builds on the work carried out previously to the south, as part of the EIA assessment work and that archaeology should be included within the proposed Cultural Heritage Chapter so that an integrated and holistic view of the historic environment can be provided and the significance of non-designated heritage assets assessed.</p>

		This approach would accord with the advice given by Historic England in their consultation response that <i>'the assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development'</i>
	5. Air Quality	<p>Mitigation measures should be informed by and HDC expects reference to 'Air quality and emissions mitigation guidance for Sussex' (2019) http://www.sussex-air.net/Reports/Sussex_AQ_Guidance_2019.pdf</p> <p>HDC have recently published the 2025 Annual Status Report on our Air Quality webpage.</p> <p>Air Quality Modelling The assessment should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in the ES. Please provide full statistical analyses to give full picture of the model performance. As the development is being built, other receptors will be created, these should be identified and considered in the modelled scenarios.</p> <p>Mitigation The Sussex Air Quality Guidance 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 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 the value from Emissions calculation and total calculated value of emissions' health damage cost. Regarding the measures to be put forward in the air quality mitigation plan HDC would request that the applicant avoids duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, HDC would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, HDC would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. Instead, HDC would highly recommend contribution to measures included in our Annual Status Report such as Walking and Cycling Measures to promote Travel alternatives in line with</p> <ol style="list-style-type: none"> West Sussex Active Travel Strategy Horsham's Local Cycling and Walking Infrastructure Plan Horsham District Council Infrastructure Delivery Plan

		<p>Construction</p> <p>9. 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>10. Follow the guidance:</p> <ul style="list-style-type: none"> a. Sussex Air (2021) Air Quality and Emissions Mitigation Guidance b. IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites c. IAQM Guidance on the assessment of dust from demolition and construction <p>Fine Particles</p> <p>An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.</p> <p>11. How has exposure to PM2.5 been considered when selecting the development site? Applicants are advised to consider the following in their application:</p> <ul style="list-style-type: none"> d. Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these, e. Site proximity to pollution sources and the impact of these on users of the development, f. Exposure and emissions during both construction and in-use. <p>12. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:</p> <ul style="list-style-type: none"> g. Site layout, h. The development's design, i. Technology used in the construction or installed for use in the development, j. Construction and future use of the development. <p>The development will be introducing new receptors close to Horsham waste water treatment works (WWTW), there is therefore the potential for those new occupants to be affected by odours. It is advisable that that developer hold discussions with the operator of Horsham WWTW. Due to the potential odour nuisance from the nearby WWTW, no sensitive development should be located within the 1.5 OdU odour contour. An Odour Assessment will need to be carried out to a specification that will need to be agreed in advance with SW Odour.</p>
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	6. Cultural Heritage	
	Table 6.1	Should identify in more detail how each asset-built heritage assets, historic landscape features and below-ground archaeological remains are likely to be impacted by the Proposed Development.
		<p>Development on this site has the potential to impact upon the setting of several designated heritage assets. The report has identified 24 listed buildings within the 500m study radius, one of which is Grade II* (Great House Farmhouse) and 23 of which are Grade II. There are additionally two Grade II* listed buildings sitting just outside of the Study Area to the northwest at Christ's Hospital School, which have been included as part of the baseline</p> <p>HDC appreciates that some of these heritage assets have been scoped out from the ES chapter based on their distance from the site, the nature of the intervening townscape/landscape, and the varying degrees of contribution given by the setting to their significance.</p> <p>The Scoping Report shows that the designated heritage assets within the near vicinity of the proposed development have been identified:</p> <p>a) Great House Farmhouse. It is acknowledged that the setting of Great House Farmhouse is likely to be altered as a result of the proposed development and then concluded that with appropriate mitigation measures in places, the effects can be reduced and minimised and would not be regarded as significant in EIA terms.</p> <p>However, as Historic England point out one of the reasons for designation of the Farmhouse at Grade II* is the historic interest of the site as derived from its location within a relict medieval landscape associated with Sele Priory. The open countryside and its historic field patterns surrounding the heritage asset make a positive contribution to the appreciation of the historic farmstead, and thus to the significance of the listed building, not simply by allowing the historical use of the building to be visually related to the land, but by providing a unified visual experience of open ground all round it. It also helps illustrate the wider historic settlement pattern across this part of the Low Weald of dispersed farmsteads with intervening countryside in between.</p> <p>Therefore, Historic England's position is there is potential for impacts to be significant, but appropriate mitigation may help to reduce some of the harmful impacts. In this respect, HDC note's Historic England strong support of the proposed mitigation to explore opportunities to reveal the significance of Great House Farm through restoration of the listed building, as noted previously by</p>

		<p>Historic England - <i>'restoration of the front elevation of the farmhouse and its repair would be a clear enhancement and would deliver heritage benefits that could help to offset the harm to some degree'</i>.</p> <p>This is not currently identified as a mitigation measure in the Scoping Report.</p> <p>b) Other designated heritage assets, undesignated heritage assets and undesignated Archaeology Of particular significance are a group of historic barns associated with Great House Farmhouse, included within the site. These structures, while forming part of the setting of the designated asset, contribute to our ability to appreciate the original function of the farmstead, making an important contribution to the character and local distinctiveness of the area and its sense of place. The majority of the Listed Buildings (Grade II), Parish Heritage Assets, undesignated archaeology and other built heritage aspects also need to be examined within the heritage baseline assessment and ES chapter. 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 of this area might have upon those elements which contribute to the significance of these assets.</p> <p>3. Setting assessment Given the scale of the proposed development and the range of heritage assets in the area, the development in this location has the potential to be visible from these assets, and as a result may affect their significance. We recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets. Techniques such as photomontages, computer generated views analysis imagery, and verified views with wireframes are a useful part of understanding visual impacts. Analysis of key views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be important. Setting may also form a part of the wider conceptual significance of a heritage asset and how it is experienced, and the ES must therefore additionally reflect these more nuanced aspects of setting in order to fully take account of impact</p> <p>An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come to together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it.</p>
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	7. Ecology	<p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun. <p>The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.</p> <p>Therefore, landscaping and biodiversity mitigation/compensation/enhancement/gain should all be informed by the Local Nature Recovery Strategy (now available in draft form) for West Sussex with particular attention to enabling residents to take an active role in nature recovery - ie mindful of LNRS directions for urban recovery as well as blending with surrounding countryside. There are also local level initiatives such as Wilder Horsham and Weald to Waves that should be referenced.</p>
	7.7.1	<p>new habitats should be tailored to Baseline Conditions. Note the southern part of the site, between Courtland wood, Kirsty's Wood and the Grade II * Great House Farm, has been identified in the draft Nature Recovery Network map 2021 as an opportunity area with very high habitat potential. These sites are high priority to target with management advice because of the significant contribution they could make to Nature Recovery but also because of the connectivity they provide between other sites. Ideally as much of this area as possible would become part of the core of the Nature Recovery Network with management to benefit nature.</p> <p>As this is a phased development, <u>to discharge the biodiversity gain condition</u>, an Overall Biodiversity Gain Plan demonstrating how the development will meet the 10% will need to be submitted. From then, prior to commencing any phase, a Phased Biodiversity Gain Plan demonstrating that phases' contribution to the overall 10% will need to be submitted to and approved by HDC. As part of the planning application, it would therefore be welcome for any phase metrics to accompany the overall metric, if the applicant wanted early review of these.</p> <p>One thing I would (re)highlight is the woodland on the northern boundary of the site. MAGIC is flagging this as priority habitat, so a buffer would also be expected here too. A minimum buffer size to respect</p>

		<p>the woodland tree RPAs would be sufficient, and like other buffers, inclusion of spiky vegetation to act as a deterrent for public access</p> <p>A reminder that some of the woodland within the site along the Downs Link (which lies outside of the LWS designation and ancient woodland parcel) is priority woodland habitat, and therefore clarification would be appreciated if this section of woodland will also receive a buffer (like that proposed for Courtland Wood).</p> <p>Any forthcoming Environmental Impact Assessment (EIA) with an Ecology component (EcIA) should adhere to the CIEEM guidance (Guidelines for Ecological Impact Assessment in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine. September 2024).</p> <p>In addition to the content of the scoping opinion submitted to date, any future EcIA should include:</p> <ul style="list-style-type: none"> • Updated baseline information resulting from updated desk study searches and ecology surveys, including limitations, assumptions and detailed methodologies, and determination of the importance of ecological features identified. • Identify data gaps. • Assessment of any construction, operation, and maintenance activities provided in detail, that may generate significant effects on ecologically important features, either directly or indirectly, in the absence of any mitigation. • Identify relationships with other environmental aspects, e.g., water and landscapes. • Any likely significant effects that may extend outside of the site boundary • Identify significant effects from other developments that may give rise to cumulative effects. • Characterise all impacts e.g., extent, magnitude, duration, reversibility, timing and frequency. • Detailed mitigation and compensation measures to overcome any significant effects and provide a clear summary of residual impacts and their significance. • Detailed enhancements to provide a biodiversity net gain. • Legal and policy consequences. <p>When conducting and EcIA, considering 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.</p> <p>As per the request in Para 7.3.14, it is agreed that for where it is stated that surveys will not be updated as part of the current application in Table 7-1 (i.e, hedgerow survey), further survey is not considered necessary if a full application is submitted within 3 years of the survey date, unless one is necessary to further inform Biodiversity Net Gain calculations and other ecology surveys (e.g., estimating hazel dormouse population densities).</p> <p>Section 15.3.4 under the Cumulative and in-combination effects states that ‘any development currently under construction that is expected to be completed before commencement of the construction phase</p>
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		<p>of the Proposed Development will be excluded from the assessment'. It is therefore requested that any developments that fit this criterion are considered within the baseline assessment.</p> <p>In addition to the EIA report, the Applicant will also be required to provide sufficient information on non-significant impacts on protected/priority/notable habitats and species, so all likely impacts and effects are known. It is also advised to review the draft West Sussex LNRS (final LNRS when published) to determine if there are any habitat enhancement priorities within the site boundary.</p> <p>Priority species. It should be noted that the scoping opinion makes no reference to priority species (which are considered different to what broadly deemed as a 'protected' or 'notable' species), which must be included.</p> <p>Designated sites. The current zone of influence used for statutory designated sites is 10km. The 12km Bat Sustenance Zone for The Mens SAC must also be taken into consideration with regards to impacts on the SAC.</p> <p>Bats. 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>Watercourse. Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Any 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>MAIN COMMENTS:</p> <p>The comments below relate primarily to Biodiversity Net Gain requirements in response to the 2025 masterplan framework submitted in the above pre-application. These comments are not exhaustive.</p> <p>It is noted that no ecology survey information has been provided. A Preliminary Ecology Appraisal alongside any further recommended up to date ecology surveys and an impact assessment will be expected as part of any forthcoming full application. As part of this, it is highlighted that the site falls within multiple SSSI impact risk zones. As mentioned within the Design Framework Document, Courtland Wood LWS is located within the red line boundary with other LWS located nearby (the closest approx. 0.5km). Irreplaceable habitat (incl. ancient woodland – both Courtland Wood and Smith's Copse - and veteran trees) are noted to be on-site and nearby to the site. Parcels of lowland mixed deciduous woodland (LMDW, priority habitat) are also dotted north and south of the site. LMDW and other priority habitats are also within the surrounding area.</p>
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		<p>The notable ecological considerations within the Design Framework Document include:</p> <ul style="list-style-type: none"> • Minimum 15m buffer around ancient woodland, with scope to increase to up to 50m (incl. for important hedgerows). • A 3-4m buffer west of New Road to reduce shading and detritus impacts on dwellings and associated gardens. • Review RPA for T122 and other retained trees, and to avoid locating roads and dwellings within RPAs. • Avoid loss of two oak trees G101, and an updated location of sports facility. <p>These are positive inclusions. I would however add that the RPAs of any trees along the west of New Road should also be respected, in that any dwellings and associated gardens should be located outside any RPAs of retained trees. To reduce impacts of artificial lighting, it may be necessary in some areas for the 3-4m buffer to be vegetated to mitigate this impact. The woodland to the north of the site should also receive protection from an appropriately sized buffer, as this is also LMDW priority habitat.</p> <p>LWS and Ancient woodlands</p> <p>Whilst efforts have been made to retain and, in some areas, enhance connectivity across the site, the spine road presents a major severance between the two woodlands (involving irreplaceable habitat and non-statutory designated site) and connecting hedgerows (and by this the Downs Link). As such, emphasis is given to the need to enhance connectivity across the spine road through canopy bridges and an appropriate species selection. This has not yet been demonstrated in the Design Framework Document.</p> <p>Courtland Wood LWS was last surveyed in August 2019. It has formerly been managed as a coppice with standards system. The understorey comprises coppice predominately of hazel and small-leaved lime, beneath standards of pedunculate oak and occasional ash. Records of greater butterfly-orchid has been identified within the LWS. It is therefore requested that the proposed buffer also comprise coppiced trees with species present in this LWS.</p> <p>Given the proximity of the proposed development to the existing woodlands, there may be an increased recreational pressure on these woodlands to which it is currently minimal. As such, strong barriers to prevent residential access will be required, to ensure that the existing woodland does not suffer degradation. This will also need to be a consideration when determining the target condition of the proposed landscape belt. Native spikey species such as hawthorn, blackthorn, dog rose etc could also be incorporated to act as a deterrent.</p>
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		<p>Allotment The new location of the allotments is located in close proximity to Smith's Copse (ancient woodland, a habitat sensitive to abiotic and biotic changes), and there is therefore concerns regarding potential impacts from fertilizers and biocides. It is understood that there will be a vegetated buffer surrounding the woodland, however particular consideration should be given to pollutant filtration to the north of the woodland and immediately surrounding the allotment.</p> <p>Sports Pitches It is noted that the location of the proposed sport pitches are close in proximity to watercourses, hedgerows and woodland. It is therefore requested that all sports pitches are greenfield pitches. Where this is not possible and artificial pitches must be installed, there are initial concerns with regards to microplastic / infill and artificial lighting pollution.</p> <p>Artificial lighting sympathetic to wildlife will also need to be considered, both at the sports pitch locations and across the site.</p> <p>Hedgerows The layout should ensure that all proposed hedgerows are not sold within private curtilages of dwellings, to ensure they can be secured and managed for a minimum of 30 years. If the hedgerows are part of the plot, then these must be incorporated into the 'vegetated garden' classification.</p> <p>Biodiversity net gain Given the habitats identified on site, all 3 modules of the statutory metric will be triggered. It is noted that Two Mile Ash Gill with a meandering nature is present on site, which appears to merge with Marlpot Gill downstream and continue through several woodlands, and therefore assigning the classification of a ditch (as seen within the Design Framework Document) will need to be justified in any forthcoming application. Note that all other watercourses (excluding culverts and ditches) require a River Condition Assessment by an appropriately qualified assessor.</p> <p>Strategic Significance Note that the LWS and surrounding buffer area and the adjoining watercourse and riparian vegetation are within a core site of the Wilder Horsham District Nature Recovery Network. Therefore, all habitats at baseline and post-development with a biodiversity value greater than zero that fall within this area are considered as having a medium strategic significance (as per HDC's BNG webpage guidance).</p>
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		<p>Newts</p> <p>The development falls within the red impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence. There are 56 ponds within 500m of the development proposal, 17 of which are onsite. There is a more recent great crested newt records onsite and within 500m. Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.</p> <p>The Scoping Report does suggest that some ecological surveys are due to be updated to support the upcoming application. We would recommend that surveys undertaken in regards to GCN are updated in order to support any future outline/full applications. Alternatively, due to the recorded GCN presence on site, the applicant may wish to enquire into the District Licensing scheme in order to demonstrate that the impacts of the proposed development can be addressed. Naturespace can be contacted at any time for a quote to enter the District Licensing scheme, which does not require further seasonally constrained newt survey work. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com</p> <p>Note Natural England advice: District Level Licensing for Great Crested Newts District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement</p>
	8. Landscape and Visual	
	8.3 Baseline Conditions Landscape receptors	HDC recommends the Horsham District Landscape Capacity Assessment (2021) and Southwater Landscape Sensitivity & Capacity Study, Prepared for Southwater Parish Council (June 2018) are added to the baseline for completeness.
	Visual Receptors	With regards exact location of viewpoints and type of visualisation proposed (shown Appendix 8.1), please refer to the previous comments provided under separate topic meeting for suggested adjustments and/or additional viewpoints. In addition, HDC recommends that final viewpoint locations and type of visualisation (in accordance with The Landscape Institute (LI) Technical Guidance Note 06/19) are agreed with the HDC prior to the formal submission of the application

	8.5 Description of Likely Significant Effects	For both stages Construction and Occupation, HDC consider that transient receptors travelling along Two Mile Ash Road should also be scoped in.
	Elements proposed to scope out	It is unclear on what is meant by ' <i>The landscape receptors beyond the Site, as no physical changes are proposed beyond the red line boundary;</i> ' as the landscape setting of the site and receptors near it, outside of the red line, would need to be scoped in. Disagreed that the NCA should be scoped out. The development is of large scale and likely to have an adverse effect on the character area. Further, the cumulative effect of the proposals alongside recent development allowed within.
	9. Noise and Vibration	Certain parts of the proposed development are located in close proximity to the heavily trafficked A24 dual carriageway, the proposals also include 'employment land' in the northern most part of the site. As mitigation, 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). HDC will also expect to see the proposed development 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 predominant sources of noise and habitable rooms not overlooking any proposed access road or yards areas.
	10. Socio-Economics 10.7.1. Table 10-6 - Elements Scoped In for Further Assessment	Needs to be demonstrated environmental constraints data sets PRoWs (not just National Trails) used to feed into process at this stage. HDC expects following elements to be demonstrated to have been considered: 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. ii) UK Power Networks notes there are overhead cables on the site running within close proximity to the proposed development. iii) Increased expenditure of the public purse to address increased recreational user pressure on Southwater Country Park and PRoW network, Downslink. 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. iii) Increased pressure on local facilities and services based on recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south) to identify. Reference to be made to Horsham District Council Infrastructure Delivery Plan and need for priority build out of secondary school.

		<p>v) Impact on viability and vitality of Lintot Square vi) Playing pitch provision (lack of) in Southwater. HDC expects this scoped in for further assessment. vii) Gypsy and Traveller community viii) Horsham's Local Cycling and Walking Infrastructure Plan</p> <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 and building stone 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 covers an area of approximately 141ha and is located within the Weald Clay (brick clay) and Building Stone 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>
	11. Traffic and Transport	<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.</p> <p>WSCC Highways note the methodology set out in chapter 11 (Traffic and Transport). It is recognised that the Traffic and Transport chapter of the EIA will make use of the data to be collected and used as part of the Transport Assessment that will be required to support a future planning application. The scope (and therefore the data) of the TA is under on-going discussion with WSCC Highways.</p>
	11.1.1.	<p>WSCC Highways: For the purposes of the TA, the study area has not been finalised with there being a likely need to include junctions and links within Horsham town centre. This is covered off within the EIA scope with the potential for additional junctions/links mentioned in 11.1.2</p>
	12. Water Resources, Flood Risk and Drainage	<p>Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun

		<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 overlayed with the Flood Zones and Surface Water Flood Risk mapping, to demonstrate how the sequential approach has been used.</p> <p>In detailing mitigation of likely effects for foul, Southern Water confirms it would expect foul drainage to connect to a public sewer for a development of this size.</p> <p>It is proposed to discharge surface water at greenfield runoff rates to watercourses within the site. In detailing mitigation of likely effects, it needs to be demonstrated in site investigations or infiltration testing to demonstrate why this is an appropriate approach, to ensure the application follows the SuDS Hierarchy and the National Standards for SuDS (NSfS). WSCC Local Lead Flood Authority advice is that as an outline application is intended, calculating the greenfield runoff rate for the entire development that could drain into the proposed surface water drainage system. Then for each catchment, calculating a pro-rata rate to determine required attenuation from each catchment.</p> <p>Winter groundwater monitoring is also recommended for completion, as a measure as this will be required at detailed design stage (if not already installed this winter).</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 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>To be considered robust mitigation, the drainage strategy should demonstrate a high-level description on how it is suggested the NSfS are followed at reserved matters. In the calculations, FEH22 rainfall, Cv value 1 and 10% urban creep are locally required. Depending on the modelling software being used the Additional Storage/MADD Factor will need to be 0. In line with the NSfS, 10% urban creep needs to be considered. The FRA must consider all sources of flood risk, with consideration of future flood risk. Any surface water flow paths shall not be obstructed. All watercourses/ditches within the red line must be retained, with a 3m maintenance easement from the top of both banks required. These</p>
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		<p>must be clearly shown on drawings, to ensure that as the application progresses, easements are retained.</p> <p>The effects of climate change on surface water flood risk need to be considered. Although the LLFA has advised to use the HDC SFRA for surface water plus climate change modelling, the SFRA pre-dates the latest Environment Agency mapping so in itself is not as reliable. Best available data right now is the Environment Agency's 'Check your long term flood risk mapping' which could supplement with your own modelling.</p> <p>When preparing for submission, it is recommended using the SuDS Proforma (Please note this hasn't been updated since the updated NSfS). HDC expect to see the following at outline application stage:</p> <ul style="list-style-type: none"> • Drainage layout showing labelled attenuation features and any proposed outfall locations. This shall include any required easements, as this could have impacts on the parameter plan. • Catchment plan to demonstrate natural catchments within the site are being followed. • Evidence that the hierarchy has been followed. • Quick storage estimates and runoff rates for the attenuation requirements. The labelling of features in calculations must match the outline drainage strategy. • HDC require proposals to follow the National Standards for SuDS. For an outline application, it needs to be demonstrated that Standard 1 (Run-off destinations/hierarchy) has been followed there is a viable method of draining the site. It also needs to be demonstrated that 1% AEP plus climate change event can be managed on site, without increasing flood risk elsewhere (Standard 3 (Management of Extreme Rainfall and Flooding)). This is because this is the Standard which affects the parameter plan the most significantly, therefore it must be demonstrated at outline stage that there is enough space for the required attenuation. • For Standards 2, 4, 5, 6 and 7, a high-level overview of the use of multi-functional SuDS and who it is thought will be responsible for the maintenance of the SuDS and ordinary watercourses (under riparian ownership) within the red line boundary is required.
	12.3.1.	Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage
	12.3.8	<p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Reference to water neutrality be updated. Refer to HDC website https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p>

	12.5.3	Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage
	13. Ground Conditions and Contamination	<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>It is local 'knowledge' that Anthrax spores have been present in the site in the past. To anticipate public interest on this, it should be demonstrated to have been considered. The anthrax issue was raised during the previous Berkley homes development but the location of the alleged carcass burning and disposal site in the vicinity of Great House Farm was unknown. Additional survey work was undertaken as required by condition 13 to application DC/14/0590. The magnetometer survey identified a possible burning site but this lay outside the area of the development. The issue was further investigated by an expert from Porton Down chemical weapons establishment who concluded there was no evidence of elevated risk from anthrax.</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 assessment (PRA), undertaken by a suitably competent, qualified and experienced environmental consultant.</p> <p><i>Soils</i></p> <p>The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):</p> <ul style="list-style-type: none"> • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted. <p>This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.</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).

		<ul style="list-style-type: none"> • 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.
	14. Greenhouse Gases	<p>The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.</p> <p>Where relevant, the ES should describe and 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.</p> <p>The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a 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 and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.</p>
	15. Cumulative Effects	<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)</p> <p>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> <ol 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

	<p>by the consenting authorities; and</p> <p>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> <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 Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south.</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/23/1178 Outline planning application with all matters reserved save for access for the development of a Sports and Leisure Hub including the provision of communal facilities, nursery, Golf College, sports club house (containing Health & Fitness spa, changing facilities and food & beverage) and an educational facility for Warren Clark Golfing Dreams (Use Classes E, F1 & F2); a local centre containing a convenience store and co-working space (Use Classes E & F2); the provision of supporting landscaping, open space and related infrastructure; outdoor sports and leisure provision comprising Driving Range, reprovision of golf (including supporting golf facilities) and hockey (including pitches and training area) (Use Class F2) and up to 800 dwellings (Use Class C3). Horsham Golf Park Denne Park Horsham West Sussex RH13 0AX</p> <p>DC/21/1524 Proposed two-storey extension to the existing sports centre to provide two new swimming pools, spa facilities, two class studios, a fitness suite and cafe. Construction of a six-lane, all-weather running track with eight-lane sprint track and ancillary athletic facilities and floodlighting. Construction of a 3G artificial grass pitch with floodlighting. Relocation of spoil on land to the east. Creation of an unlit outdoor adventure area with 15 stations east of the new track. Associated car parking for 272 cars, and a new</p>
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		<p>permanent access to Christ Hospital Road, closure of the existing Infirmary Drive access with conversion of disused section of drive to a sprint track. Erection of associated equipment store, fencing and lighting Christ's Hospital School The Avenue Christ's Hospital Horsham West Sussex RH13 0LJ</p> <p>DC/24/0249 Reserved matters application for the erection of 96 dwellings and ancillary parking and landscaping following approval of outline application DC/20/0695 (up to 100 residential units with associated vehicular and pedestrian access), relating to layout, scale, appearance and landscaping. Rascals Farm, Shipley Road, Southwater, West Sussex</p> <p>DC/21/2180 Outline application for the erection of up to 73 new dwellings (up to 100% affordable housing) and retention of existing farmhouse building, associated public open space, landscaping, drainage and highway infrastructure works, including vehicular access from Shipley Road, with all matters reserved except for access. Woodfords Shipley Road Southwater Horsham West Sussex RH13 9BQ</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>
	16. Summary	No comments

Consultee Response

Case Ref: EIA/25/0006	Date: 11 December 2025
From: NatureSpace	Response: Advice given

This planning application is for: **EIA Scoping Opinion Request**

Summary

- The development falls within the red impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence.
- There are 56 ponds within 500m of the development proposal, 17 of which are onsite.
- There is a more recent great crested newt records onsite and within 500m.
- Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.



Figure above: Outline of the site (red) in the context of the surrounding landscape, including the Impact Risk Zones for GCN. Ponds are shown in light blue. A 250m buffer is shown around the site in green and a 500m buffer in blue. Contains public sector information licensed under the Open Government Licence v3.0.

Ecological Information

The applicant has provided some ecological information in the form of, EIA Scoping Report, Land West of Southwater, WSP, October 2025. Within this report it states that:

- *"This section is based on the emerging findings of a suite of specific studies conducted at the Site since 2019. These include a Phase 1 habitat survey, an ecological desk study, a hedgerow survey, a Phase 2 botanical survey, and protected species surveys for bats, dormice, water vole, otter, breeding and wintering birds, reptiles, great crested newts and invertebrates completed between 2019 and 2022."*

- *"Where appropriate these works are being updated in support of the forthcoming application."*
- *"Great Crested Newts have been recorded as absent from all the waterbodies subject to sampling during the 2021/ 2022 survey, however a single Great Crested Newt was recorded in terrestrial habitat during other fieldwork in the central area of the Site in 2021"*

Conclusion and recommendation for conditions

The above report does suggest that some ecological surveys are due to be updated to support the upcoming application. We would recommend that surveys undertaken in regards to GCN are updated in order to support any future outline/full applications.

Alternatively, due to the recorded GCN presence on site, the applicant may wish to enquire into the District Licensing scheme in order to demonstrate that the impacts of the proposed development can be addressed.

Naturespace can be contacted at any time for a quote to enter the District Licensing scheme, which does not require further seasonally constrained newt survey work. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com

Contact details: info@naturespaceuk.com

Relationship between NatureSpace and Horsham District Council

Horsham District Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England. This is administered by NatureSpace Partnership through their District Licensing Scheme as the council's delivery partner. A dedicated 'District Licensing Officer' is employed by NatureSpace to provide impartial advice to the council and help guide them and planning applicants through the process. All services and arrangements are facilitated in an unbiased, independent and transparent manner. You can find out more at www.naturespaceuk.com

Legislation, Policy and Guidance

Reasonable Likelihood of Protected Species

Permission can be refused if adequate information on protected species is not provided by an applicant, as it will be unable to assess the impacts on the species and thus meet the requirements of the National Planning Policy Framework (2023), ODPM Circular 06/2005 or the Conservation of Habitats and Species Regulations 2017 (as amended). The Council has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications. CLG 2007 'The validation of planning applications' states that applications should not be registered if there is a requirement for an assessment of the impacts of a development on biodiversity interests.

Section 99 of ODPM Circular 06/2005 states:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations before permission is granted."

Great crested newts

Great crested newts and their habitats are fully protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Therefore, it is illegal to deliberately capture, injure, kill, disturb or take great crested newts or to damage or destroy breeding sites or resting places. Under the Wildlife and Countryside Act 1981 (as amended) it is illegal to intentionally or recklessly disturb any great crested newts occupying a place of shelter or protection, or to obstruct access to any place of shelter or protection (see the legislation or seek legal advice for full details). Local planning authorities have a statutory duty in exercising of all their functions to *'have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity,'* as stated under section 40 of the Natural Environment and Rural Communities Act 2006 (as amended), as well as a duty under the Conservation of Habitats and Species Regulations 2017 (as amended) to have regard to the requirements of the Habitats Directive. As a result, GCN and their habitats are a material consideration in the planning process.

Lifespan of Ecological Reports and Surveys

Validity of ecological reports and surveys can become compromised overtime due to being out-of-date. CIEEM Guidelines for Ecological Report Writing (CIEEM, 2017) states, if the age of data is between 12-18 months, *"the report authors should highlight whether they consider it likely to be necessary to update surveys"*. If the age of the data is between 18 months to 3 years an updated survey and report will be required and anything more than 3 years old *"The report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated"*.

Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Matthew Porter
Development Control
Albery House
Springfield Road
Horsham
RH12 2GB

Date 11th December 2025

Dear Matthew,

RE: EIA/25/0006 – Land West of Southwater, West Sussex

Thank you for your consultation on the above site, received on 24th November 2025. We have reviewed the application as submitted and wish to make the following comments.

As this is an EIA scoping it is accepted that the majority of the surface water related information will be included within the ES and FRA/Drainage Strategy, therefore the LLFA will provide detailed comments throughout the pre-application advice service which the applicant is using.

Nevertheless we have the following comments to make:

1. We agree flood risk should be scoped in for this application.
2. The FRA must include all sources of flood risk, and follow PPG Flood risk and coastal change. The drainage strategy and supporting information submitted must use up to date parameters. It is strongly suggested that the use of open, source control SuDS is considered from the beginning of the design process for the masterplan for each phase, instead of reliance on traditional underground piped networks. Further guidance on this can be found in the PPG Flood risk and coastal change.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
FloodRiskManagement@westsussex.gov.uk

Date: 10 December 2025
Our ref: 535253
Your ref: EIA/25/0006



Mr Matthew Porter
Horsham District Council

BY EMAIL ONLY
planning@horsham.gov.uk

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Mr Porter

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): EIA Scoping Opinion Request
Location: Land West of Southwater West Sussex

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 22 November 2025, received on 22 November 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that Natural England must be consulted on Environmental Statements.

Please send any new consultations or further information on this consultation to consultations@naturalengland.org.uk.

Yours sincerely

Chloe Lancaster
Consultations Team

Annex A – Natural England Advice on EIA Scoping

General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

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):

- 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.

Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

Biodiversity and Geodiversity

General principles

The [National Planning Policy Framework](#) (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Local planning authorities have a [duty](#) to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

Nationally designated sites

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- Upper Arun

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 186 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration

of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

Protected Species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, [REDACTED] and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

District Level Licensing for Great Crested Newts

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

Ancient Woodland, ancient and veteran trees

The development site is within an area of ancient woodland.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 193 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Biodiversity net gain

Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including [draft Planning Practice Guidance](#), can be found [here](#)

The statutory [biodiversity metric](#), together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure.

It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

Heritage Landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting People with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. 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.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Soils and Agricultural Land Quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- 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 off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and

The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) ^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

Natural England has produced '[Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site](#)'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).

The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

Water Quality

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site. Further information can be obtained from the Local Planning Authority.

Climate Change

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a 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 and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's](#) (CCC) [Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme](#) (NAP), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

Contribution to local environmental initiatives and priorities

The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC - Minerals and Waste Safeguarding
DATE:	3 December 2025
LOCATION:	Land West of Southwater West Sussex
SUBJECT:	EIA/25/0006 EIA Scoping Opinion Request
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	Advice

WSCC Minerals and Waste Planning Authority have been consulted on this application for an Environmental Scoping Opinion form 1000 homes and associated infrastructure on land west of Southwater. While we do not have any specific comments to make in relation to potential environmental impacts at this stage, we would wish to raise the following matters:

The application site covers an area of approximately 141ha and is located within the Weald Clay (brick clay) and Building Stone 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.

It is noted that the northern part of the application site is within the consultation buffer zone for existing waste infrastructure (Hop Oast/Horsham Household Waste Recycling Site). 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 this by submitting a Waste Infrastructure Safeguarding Assessment as appropriate.

Jack Elliott
Planning Technician



Minerals and Waste
West Sussex County Council – Planning Services



HORSHAM DISTRICT COUNCIL CONSULTATION

TO: Jason Hawkes	Horsham District Council – Planning Dept
LOCATION:	Land West of Southwater, West Sussex
DESCRIPTION:	EIA Scoping Opinion Request
REFERENCE:	EIA/25/0006
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: The site is very large, and the southern part is within an Archaeological Notification Area designated following previous archaeological Survey. There is clear potential for significant archaeological remains to be present on the site and so I do not agree with the suggestion that archaeology can be scoped out of the EIA and so consider it would be reasonable to include below ground archaeology within the proposed Cultural Heritage Chapter to inform the Environmental Statement	

MAIN COMMENTS:

The applicants have included a chapter on Cultural Heritage by WSP within the EIA Scoping Opinion Request Report. The report confirms that cultural Heritage will be included for assessment in the forthcoming EIA but that it is proposed that archaeology will be scoped out.

The site is large, and the majority of the area has not been subject to previous archaeological investigation although the southern part of the site is within an Archaeological Notification Area DWS8545 which includes evidence from a magnetic gradiometer survey that identified a number of probable archaeological features including a number of enclosures and pit alignments with some features possibly related to former kilns or hearths.

The scoping report considers that the site has a moderate potential for deposits of earlier prehistoric, later prehistoric (Iron Age) and Romano-British date within the Site, and a low to moderate potential for deposits dating to the Anglo-Saxon and Medieval periods, but the true nature of the archaeological resource and its significance remains to be determined and so further assessment and investigations will be required.

I consider that it would be reasonable to carry out these investigations, which should include a geophysical survey of the site which builds on the work carried out previously to the south, as part of the EIA assessment work and that archaeology should be included within the proposed Cultural Heritage Chapter so that an integrated and holistic view of the historic environment can be provided and the significance of non-designated heritage assets assessed.

This approach would accord with the advice given by Historic England in their consultation response that *'the assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development'*

ANY RECOMMENDED CONDITIONS:

N/A at this stage

NAME:

Nick Truckle BA MCIfA

DEPARTMENT:

Surrey County Council Historic Environment Planning

DATE:

4/12/2025

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC – Highways Authority
DATE:	4 December 2025
LOCATION:	Land West of Southwater West Sussex
SUBJECT:	EIA/25/0006 EIA Scoping Opinion Request
RECOMMENDATION:	Advice

WSCC Highways note the methodology set out in chapter 11 (Traffic and Transport) of the EIA Scoping Note. It's recognised that the Traffic and Transport chapter of the EIA will make use of the data to be collected and used as part of the Transport Assessment that will be required to support a future planning application. The scope (and therefore the data) of the TA is under on-going discussion with WSCC Highways.

The only comment WSCC make concerning the EIA scope is the study area set out in 11.1.1. For the purposes of the TA, the study area has not been finalised with there being a likely need to include junctions and links within Horsham town centre. This is covered off within the EIA scope with the potential for additional junctions/links mentioned in 11.1.2.

WSCC Highways otherwise have no comments on the proposed EIA scope.

Ian Gledhill
West Sussex County Council – Planning Services



Mr Matthew Porter
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Our ref: PL00800553

1 December 2025

Dear Mr Porter

**EIA/25/0006 - EIA SCOPING REQUEST - LAND WEST OF SOUTHWATER,
HORSHAM**

Thank you for contacting us on 22 November 2025 regarding an EIA scoping opinion in relation to the above site.

Advice

1. The Proposal

Outline permission is to be sought for a residential-led development to provide up to 1,000 homes (a mix of C2 and C3 use classes), an employment area, local retail, community and leisure facilities, provision for nursery, primary and secondary school, gypsy and traveller pitches, landscaping, open space and new road improvements

2. Significance

Development on this site has the potential to impact upon the setting of a number of designated heritage assets.

The report produced by WSP to support the Scoping Opinion Request has identified 24 listed buildings within the 500m study radius, one of which is Grade II* (Great House Farmhouse) and 23 of which are Grade II. There are additionally two Grade II* listed buildings sitting just outside of the Study Area to the northwest at Christ's Hospital School, which have been included as part of the baseline

We appreciate that some of these heritage assets have been scoped out from the ES chapter based on their distance from the site, the nature of the intervening townscape/landscape, and the varying degrees of contribution given by the setting to their significance.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Our initial assessment of the Scoping Report shows that the designated heritage assets within the near vicinity of the proposed development have been identified.

a) Great House Farmhouse

Our focus is on impacts on Great House Farmhouse as a grade II* listed building which will be entirely enclosed by the Site on all sides. Its associated barns are within the site boundary.

Significance can be harmed or lost through alteration or destruction of a heritage asset, or through development within its setting.

In this respect, although the document acknowledges that the setting of Great House Farmhouse is likely to be altered as a result of the proposed development, it then concludes that with appropriate mitigation measures in places, the effects can be reduced and minimised and would not be regarded as significant in EIA terms.

However, one of the reasons for designation of the Farmhouse at Grade II* is the historic interest of the site as derived from its location within a relict medieval landscape associated with Sele Priory. The open countryside and its historic field patterns surrounding the heritage asset make a positive contribution to the appreciation of the historic farmstead, and thus to the significance of the listed building, not simply by allowing the historical use of the building to be visually related to the land, but by providing a unified visual experience of open ground all round it.

It also helps illustrate the wider historic settlement pattern across this part of the Low Weald of dispersed farmsteads with intervening countryside in between.

Therefore, there is potential for impacts to be significant, but appropriate mitigation may help to reduce some of the harmful impacts. In this respect, we strongly support the proposed mitigation to explore opportunities to reveal the significance of Great House Farm through restoration of the listed building, as noted previously by us - *'restoration of the front elevation of the farmhouse and its repair would be a clear enhancement and would deliver heritage benefits that could help to offset the harm to some degree'*.

b) Other designated heritage assets, undesignated heritage assets and undesignated Archaeology

Of particular significance are a group of historic barns associated with Great House Farmhouse, included within the site. These structures, while forming part of the setting of the designated asset, contribute to our ability to appreciate the original function of the farmstead, making an important contribution to the character and local distinctiveness of the area and its sense of place.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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The fact that the EIA Scoping will assess importance/sensitivity of heritage assets on the basis of their status and listing grade can be problematic for such undesignated heritage assets, as they may be of higher value than the low level that they have been assigned to. Notwithstanding this, we welcome the stated commitment to retain these historic barns in the proposed development.

The submitted documentation has accurately identified historic landscape boundaries and noted that a large part of the central and southern portion of the site lies within an Archaeological Notification Area (ANA), resulted from a geophysical survey carried out in 2011.

The majority of the Listed Buildings (Grade II), Parish Heritage Assets, undesignated archaeology and other built heritage aspects will be a matter for the Local Authority and West Sussex County Council. Impacts on these heritage assets will also need to be examined within the heritage baseline assessment and ES chapter.

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 of this area might have upon those elements which contribute to the significance of these assets.

3. Setting assessment

Given the scale of the proposed development and the range of heritage assets in the area, the development in this location has the potential to be visible from these assets, and as a result may affect their significance.

We recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets. Techniques such as photomontages, computer generated views analysis imagery, and verified views with wireframes are a useful part of understanding visual impacts. Analysis of key views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be important.

Setting may also form a part of the wider conceptual significance of a heritage asset and how it is experienced, and the report must therefore additionally reflect these more nuanced aspects of setting in order to fully take account of impact.

Further guidance on setting can be found at our website:

(<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>). Version 4 of this document is currently under review.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

4. Overall approach

An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it. The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area.

The assessment should also consider the likelihood of alterations to drainage and ground water 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.

We support the proposed strategy for preserving historic landscape boundaries within the development and for assessing any known and potential below-ground archaeological remains within the site and its surroundings within 1 km from its boundary.

The assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development.

The submitted documentation has accurately identified historic landscape boundaries and noted that a large part of the central and southern portion of the site lies within an Archaeological Notification Area (ANA), resulted from a geophysical survey carried out in 2011.

We strongly recommend that you involve your own conservation staff and archaeological staff West Sussex County Council in the development of this assessment. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures (as decided at a further stage in any project); and opportunities for securing wider benefits for the future conservation and management of heritage assets.

6. Policy

There will be a requirement through planning policy (NPPF and local policy) to avoid and minimise harm to heritage assets, and there will be a presumption in favour of



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Telephone 020 7973 3700
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conserving designated assets. By following planning policy and guidance we would also additionally expect the project to be creative in how it might offer opportunities for their enhancement, and how the project might deliver public (heritage) benefit.

Recommendation

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,

Alma Howell

Alma Howell
Inspector of Historic Buildings and Areas



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Your ref
EIA/25/0006

Our ref
DSA000049334

Date
27th of November 2025

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: EIA Scoping Opinion Request.
Site: Land West of Southwater West Sussex.

Thank you for your correspondence, please see our comments below regarding the above application.

EIA Scoping

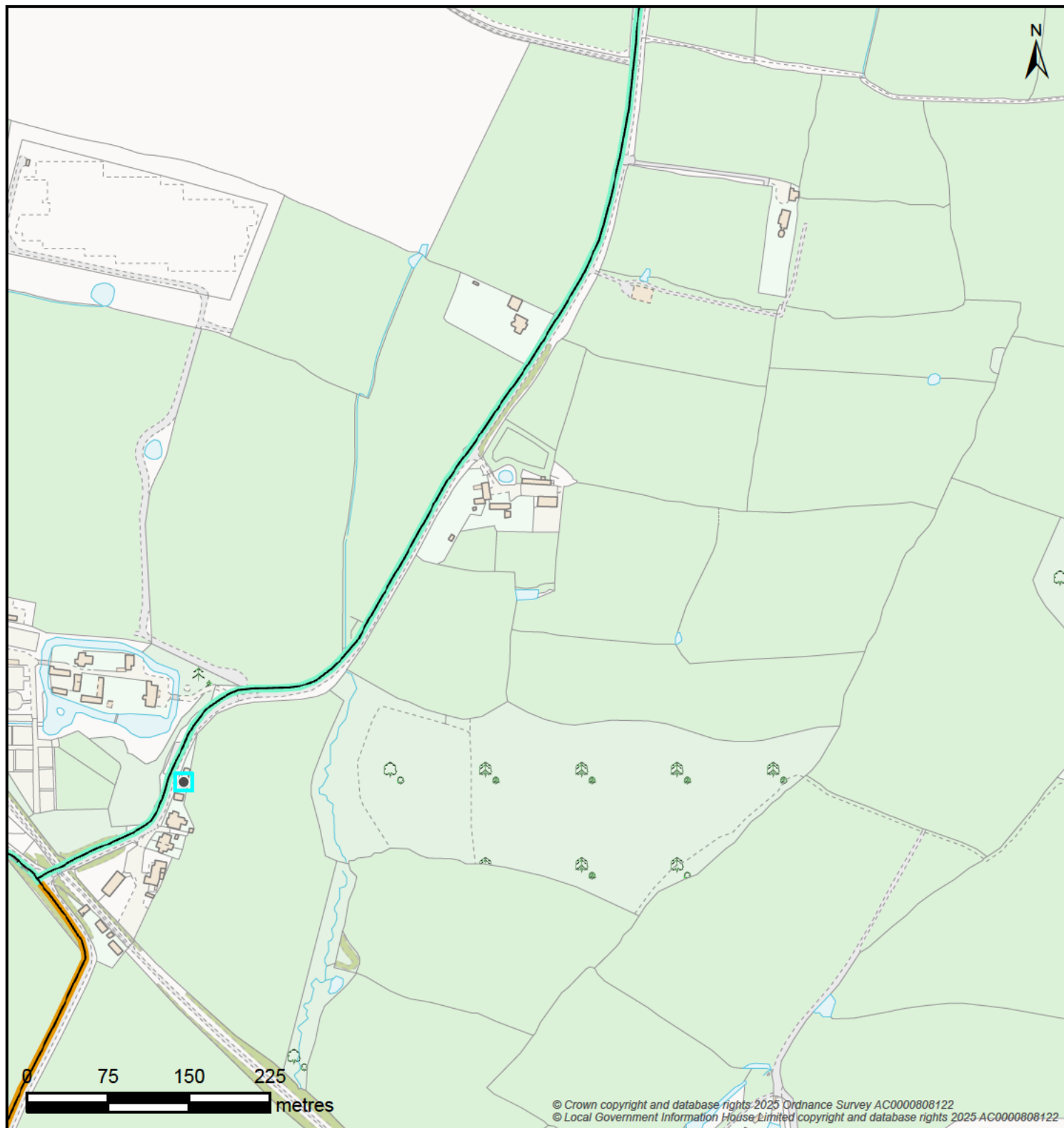
Southern Water has no objections to the scoping application due to the submitted report advising using the SUDS drainage scheme.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119)

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team
southernwater.co.uk/developing-building/planning-your-development



Controllable Valve			Flow Control			Inlet-Outfall	
Manhole							
Outfall Headworks		Overflow Chamber		Pipe Bridge		Pumping Station	
Sewer Level Monitor		Storage		Treatment Works		Weir	
Wastewater Pipe				Wastewater Use		Developer Services	

Map Title: DSA000049334 GIS

Printed By: Kelly.Donaldson

Date Printed: 27/11/2025

Map Scale: 5000

The information provided is believed to be correct but is provided on an 'as is' basis and without any warranty or condition express or implied, statutory or otherwise as to its quality or fitness for purpose. Actual positions of assets should always be determined on site.



Horsham District Council
Planning team
Parkside Chart Way
Horsham
West Sussex
RH12 1RL

Our ref: HA/2025/127266/01
Your ref: EIA/25/0006
Date: 25 November 2025

Dear Planning team (FAO: Matthew Porter),

EIA SCOPING OPINION REQUEST.

LAND WEST OF SOUTHWATER, WEST SUSSEX.

Thank you for consulting the Environment Agency on the above EIA Scoping Opinion Request.

We have reviewed the submitted 'EIA Scoping Report' (dated October 2025, by WSP) and confirm that the scoping assessment is satisfactory in regard to matters within our remit.

If you have any queries regarding the above information, please do not hesitate to contact the advisor identified below.

Yours faithfully,

Environment Agency – Solent & South Downs

Sustainable Places Advisor: Anna Rabone

[Redacted signature]

[Redacted contact information]



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Northwest of Southwater Horsham
DESCRIPTION:	Outline planning application with all matters reserved for a mixed-use development (1000 new homes)
REFERENCE:	EIA/25/xxxx
RECOMMENDATION:	Advice

The comments below focus on Chapter 8 – Landscape and Visual of the EIA Scoping report and are provided by section as follows:

8. 3 Baseline Conditions

Landscape receptors

1. We recommend the Horsham District Landscape Capacity Assessment (2021) and Southwater Landscape Sensitivity & Capacity Study, Prepared for Southwater Parish Council (June 2018) are added to the baseline for completeness.

Visual Receptors

2. With regards exact location of viewpoints and type of visualisation proposed (shown Appendix 8.1), please refer to the previous comments for suggested adjustments and/or additional viewpoints. In addition, we recommend that final viewpoint locations and type of visualisation (in accordance with The Landscape Institute (LI) Technical Guidance Note 06/19) are agreed with the LPA prior to the formal submission of the application.

8.5 Description of Likely Significant Effects

3. For both stages Construction and Occupation, we consider that Transient receptors travelling along Two Mile Ash road should also be scoped in

Elements proposed to scope out

4. It is unclear on what is meant by '*The landscape receptors beyond the Site, as no physical changes are proposed beyond the red line boundary;*' as the landscape setting of the site and receptors in close proximity to it, outside of the red line, would need to be scoped in.
5. It is disagreed that the NCA should be scoped out. The development is of large scale and likely to have an adverse effect on the character area. Further, the cumulative effect of the proposals alongside recent development allowed within

the area needs to be considered therefore for completeness, it is considered that this should be scoped in.

6. The remaining receptors proposed to be scoped out are agreed.

Appendix 8.1 - LVIA Representative Views and Methodology September 2025

Introduction - Field work

7. As discussed, photographs illustrating the site with winter views are recommended

NAME:	Inês Watson CMLI Specialist Team Leader (Landscape Architect)
DEPARTMENT:	Specialists Team - Strategic Planning
DATE:	11/11/2025



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Northwest of Southwater Horsham
DESCRIPTION:	Outline planning application with all matters reserved for a mixed-use development.
REFERENCE:	PE/25/0217
RECOMMENDATION:	Advice
SUMMARY OF COMMENTS & RECOMMENDATION:	
MAIN COMMENTS: <p>This consultation response to the newly submitted EIA Scoping Report should be read in conjunction with the consultation response submitted on 17th October 2025.</p> <p><u>EIA Scoping Opinion</u></p> <p>Any forthcoming Environmental Impact Assessment (EIA) with an Ecology component (EcIA) should adhere to the CIEEM guidance (Guidelines for Ecological Impact Assessment in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine. September 2024).</p> <p>In addition to the content of the scoping opinion submitted to date, any future EcIA should include:</p> <ul style="list-style-type: none">• Updated baseline information resulting from updated desk study searches and ecology surveys, including limitations, assumptions and detailed methodologies, and determination of the importance of ecological features identified.• Identify data gaps.• Assessment of any construction, operation, and maintenance activities provided in detail, that may generate significant effects on ecologically important features, either directly or indirectly, in the absence of any mitigation.• Identify relationships with other environmental aspects, e.g., water and landscapes.• Any likely significant effects that may extend outside of the site boundary• Identify significant effects from other developments that may give rise to cumulative effects.• Characterise all impacts e.g., extent, magnitude, duration, reversibility, timing and frequency.• Detailed mitigation and compensation measures to overcome any significant effects and provide a clear summary of residual impacts and their significance.• Detailed enhancements to provide a biodiversity net gain.• Legal and policy consequences.	

When conducting an EcIA, considering 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.

As per the request in Para 7.3.14, it is agreed that for where it is stated that surveys will not be updated as part of the current application in Table 7-1 (i.e, hedgerow survey), further survey is not considered necessary if a full application is submitted within 3 years of the survey date, unless one is necessary to further inform Biodiversity Net Gain calculations and other ecology surveys (e.g., estimating hazel dormouse population densities).

Section 15.3.4 under the Cumulative and in-combination effects states that 'any development currently under construction that is expected to be completed before commencement of the construction phase of the Proposed Development will be excluded from the assessment'. It is therefore requested that any developments that fit this criterion are considered within the baseline assessment.

In addition to the EIA report, the Applicant will also be required to provide sufficient information on non-significant impacts on protected/priority/notable habitats and species, so all likely impacts and effects are known. It is also advised to review the draft West Sussex LNRS (final LNRS when published) to determine if there are any habitat enhancement priorities within the site boundary.

Priority species

It should be noted that the scoping opinion makes no reference to priority species (which are considered different to what broadly deemed as a 'protected' or 'notable' species), which must be included.

Designated sites

The current zone of influence used for statutory designated sites is 10km. The 12km Bat Sustainance Zone for The Mens SAC must also be taken into consideration with regards to impacts on the SAC.

Bats

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 sustainance zones for the species as per BCT guidance should be considered.

Watercourse

Any 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.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Linsey King Ecology Officer (Planning)
DEPARTMENT:	Strategic Planning - Specialists
DATE:	29/10/2025



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Northwest of Southwater Horsham
DESCRIPTION:	Outline planning application with all matters reserved for a mixed use development.
REFERENCE:	PE-25-0217
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Air Quality comments regarding the outline planning application PE-25-0217 and EIA Scoping Report.	

MAIN COMMENTS:**Land Contamination**

1. 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 assessment (PRA), undertaken by a suitably competent, qualified and experienced environmental consultant.

Noise

1. Certain parts of the proposed development are located in close proximity to the heavily trafficked A24 dual carriageway, the proposals also include 'employment land' in the northern most part of the site. These on and off sources of noise are therefore potential constraints to development.
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 the proposed development 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 predominant sources of noise and habitable rooms not overlooking any proposed access road or yards areas.

Odour

1. The development will be introducing new receptors close to Horsham waste water treatment works (WWTW), there is therefore the potential for those new occupants to be affected by odours. It is advisable that that developer hold discussions with the operator of Horsham WWTW.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:

Kevin Beer

DEPARTMENT:

Environmental Health

DATE:

23rd October 2025



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Northwest of Southwater Horsham
DESCRIPTION:	Outline planning application with all matters reserved for a mixed use development.
REFERENCE:	PE-25-0217
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Air Quality comments regarding the outline planning application PE-25-0217 and EIA Scoping Report.	

MAIN COMMENTS:

1. We have recently published the 2025 Annual Status Report on our [Air Quality webpage](#).

Air Quality Modelling

2. Major applications should consider supplementing local authority monitoring with own monitoring - which would help to increase model certainty and confidence in the results.
3. Liaise with the planning department for information on any other schemes that should be included in a cumulative impacts' scenario.
4. 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.
5. As the development is being built, other receptors will be created, these should be identified and considered in the modelled scenarios.

Odour

6. The development will be introducing new receptors close to Horsham waste water treatment works (WWTW) and there is the potential for those new occupants to be affected by odours. It is advisable that that developer hold discussions with the operator of Horsham WWTW.

Mitigation

7. The Sussex Air Air Quality Guidance 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 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 the value from Emissions calculation and total calculated value of emissions' health damage cost.
8. Regarding the measures to be put forward in the air quality mitigation plan we would request that the applicant avoids duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, we would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. Instead, we would highly recommend contribution to measures included in our Annual Status Report such as Walking and Cycling Measures to promote Travel alternatives in line with
 - a. West Sussex Active Travel Strategy
 - b. Horsham's Local Cycling and Walking Infrastructure Plan
 - c. Horsham District Council Infrastructure Delivery Plan

Construction

9. As the development is being built, other receptors will be created, these should be identified and considered in the construction dust management plan.

10. Follow the guidance:

- a. Sussex Air (2021) Air Quality and Emissions Mitigation Guidance
- b. IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites
- c. IAQM Guidance on the assessment of dust from demolition and construction

Fine Particles

An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.

11. How has exposure to PM2.5 been considered when selecting the development site? *Applicants are advised to consider the following in their application:*

- d. Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,
- e. Site proximity to pollution sources and the impact of these on users of the development,
- f. Exposure and emissions during both construction and in-use.

12. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? *Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:*

- g. Site layout,
- h. The development's design,
- i. Technology used in the construction or installed for use in the development,
- j. Construction and future use of the development.

ANY RECOMMENDED CONDITIONS:

NAME:

Thais Delboni

DEPARTMENT:

Environmental Health – Air Quality

DATE:

21st October 2025

Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:52
To: Matthew.Porter
Subject: FW: EIA/25/0006 Land West of Southwater West Sussex

Matthew Porter

Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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Communications received after 5pm will be regarded as being served on the next working day.

Please contact us in advance if your email, including any attachments, is going to exceed 30MB.

From: Melbourne, Lee 03605 [REDACTED]
Sent: 24 November 2025 12:00
To: Matthew.Porter [REDACTED]
Subject: EIA/25/0006 Land West of Southwater West Sussex

Good morning Matthew,

Re: EIA/25/0006 Land West of Southwater West Sussex

I have reviewed the documents as submitted and have no comments to make from a crime prevention perspective.

All the best

Lee

Miss Lee A Melbourne (Pronouns She/Her/Hers)

Designing Out Crime Officer

Local Policing Service Improvement and Engagement Department

Sussex Police Headquarters

Amberley Block

Church Lane

Lewes

East Sussex

BN7 2DZ

I work flexibly so I am sending this email at a time that suits me. Please be assured that I do not expect you to respond outside of your normal working day.





You can report crime and incidents online at

<https://www.sussex.police.uk/report-online>

We want to know your views - see what's new and give us your feedback and suggestions at

www.sussex.police.uk

If you have received this message in error, please contact the sender as soon as possible - you may not copy it, or make use of any information contained in it for any purpose, or disclose its contents to any other person. Messages sent and received by Sussex Police are not private and may be the subject of monitoring.

Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:52
To: Matthew.Porter
Subject: FW: EIA/25/0006 LAND NORTH OF SOUTHWATER RH13 9FB

Matthew Porter
Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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Communications received after 5pm will be regarded as being served on the next working day.
Please contact us in advance if your email, including any attachments, is going to exceed 30MB.

Sent: 25 November 2025 10:17
To: Planning <planning@horsham.gov.uk>
Subject: EIA/25/0006 LAND NORTH OF SOUTHWATER RH13 9FB

or consulting Sport England.

and considers that the impact of a development on sports facilities or activities would not normally form part of an Environmental Statement. Consequently, we do not wish to comment on the Screening or Scoping Statement.

Any subsequent planning application should consider the implications for sport in the context of NPPF, local planning policy, and any strategic evidence set out in local playing pitch and/or built facilities strategies.

The Council should be consulted on the planning application if it meets the statutory requirements contained in the Planning Practice Guidance (PPG) (development affecting playing fields) or the guidance for non-statutory consultation with Sport England (set out within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003, Reference: 14-0306)).

Further guidance on assessing the need to protect, enhance and provide sports facilities can be found by following the link below:

www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

For any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours faithfully,

Technical Team

technical@sportengland.org



Join the conversation [#thisgirlcan](#)



Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:52
To: Matthew.Porter
Subject: FW: Comments for Planning Application EIA/25/0006

Matthew Porter
Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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Communications received after 5pm will be regarded as being served on the next working day.
Please contact us in advance if your email, including any attachments, is going to exceed 30MB.

From: Planning@horsham.gov.uk [Redacted]
Sent: 25 November 2025 11:01
To: Planning <planning@horsham.gov.uk>
Subject: Comments for Planning Application EIA/25/0006

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 25/11/2025 11:00 AM.

Application Summary

Address:	Land West of Southwater West Sussex
Proposal:	EIA Scoping Opinion Request
Case Officer:	Matthew Porter

[Click for further information](#)

Customer Details

Address: UK Power Networks Barton Road Bury St Edmunds

Comments Details

Commenter
Type: Consultee

Stance: Customer objects to the Planning Application

Reasons for
comment:

Comments: ear Sir/Madam

We note there are overhead cables on the site running within close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.

In the instance of overhead cables within the vicinity, GS6 (Advice on working near overhead powerlines) and a safety visit is required by UK Power Networks. Information and applications regarding GS6 can be found on our website <https://www.ukpowernetworks.co.uk/safety-equipment/power-lines/working-near-power-lines/advice-on-working-near-overhead-power-lines-gs6#Apply>

Should any diversion works be necessary because of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG.

You can also find support and application forms on our website [Moving electricity supplies or equipment | UK Power Networks](#)

Regards
Kristina Green

Kind regards

Telephone:

Email: planning@horsham.gov.uk



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:51
To: Matthew.Porter
Subject: FW: PE/25/0217 Southwater - Document Pack 24th Nov - HDC Ecology (BNG) Response

Matthew Porter
Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

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From: Linsey.King [REDACTED]
Sent: 25 November 2025 10:51
To: Matthew.Porter [REDACTED]
Subject: RE: PE/25/0217 Southwater - Document Pack 24th Nov - HDC Ecology (BNG) Response

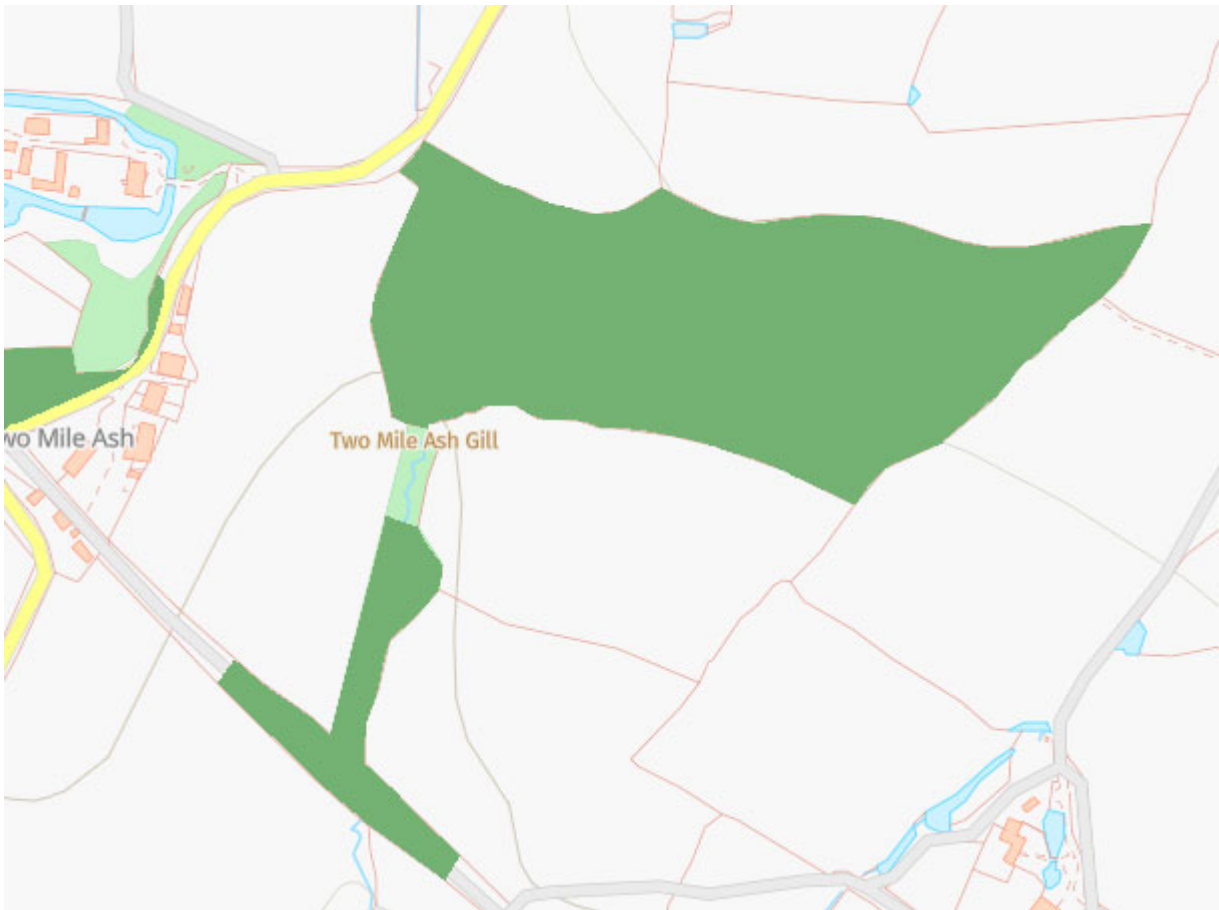
Hi Matt,

I'm happy with their response, and it's positive that my comments from the initial consultation have been taken on board. I should add that as this is a phased development, to discharge the biodiversity gain condition, an Overall Biodiversity Gain Plan demonstrating how the development will meet the 10% will need to be submitted. From then, prior to commencing any phase, a Phased Biodiversity Gain Plan demonstrating that phases' contribution to the overall 10% will need to be submitted to and approved by HDC. As part of the planning application, it would therefore be welcome for any phase metrics to accompany the overall metric, if the applicant wanted early review of these.

One thing I would (re)highlight is the woodland on the northern boundary of the site. MAGIC is flagging this as priority habitat, so a buffer would also be expected here too. A minimum buffer size to respect the woodland tree RPAs would be sufficient, and like other buffers, inclusion of spiky vegetation to act as a deterrent for public access.



A reminder that some of the woodland within the site along the Downs Link (which lies outside of the LWS designation and ancient woodland parcel) is priority woodland habitat, and therefore clarification would be appreciated if this section of woodland will also receive a buffer (like that proposed for Courtland Wood).



Best,
Linsey

Linsey King

Ecology Officer
Specialists Team - Strategic Planning



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Jane Eaton

From: Matthew.Porter [redacted]
Sent: 24 November 2025 14:37
To: Ines.Watson [redacted]; Tal Kleiman [redacted]; Linsey.King [redacted]
[redacted]; Kevin.Beer [redacted]; Lee.Money [redacted]
[redacted]; Thais Covre Delboni [redacted]
Cc: Adrian.Smith [redacted]
Subject: PE/25/0217 Southwater - Document Pack 24th Nov

Hi all,

Attached is the latest document pack from LWoS. This was the last of the pre-app stage meetings of the PPA. Application submission is Feb next year.
Please provide me any comments on the material

Please forward any outstandings on the ES Scoping by close of this week at the latest, as my earlier requested date (14th Nov) has now passed.

Matthew Porter

Principal Planning Officer



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From: Max Gull [redacted]
Sent: 24 November 2025 13:19
To: Matthew.Porter [redacted]

[REDACTED]

Subject: Southwater - Document Pack

Dear Matthew,

Following our meeting earlier today, please see enclosed the following documents:

- Energy, Sustainability and Water Neutrality Scoping Note
- Ecology Technical Note
- Updated Masterplan proposals
- Draft Phasing Plan

I have also enclosed a tracked changes version of the PPA timetable to reflect the latest intended submission in February 26. As echoed by Dan, the revised timetable pushes back the key discussion points by 2 months. Please let me know if you have any questions.

Kind Regards,

Max Gull

Max Gull

Senior Planner

[REDACTED]



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Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:50
To: Matthew.Porter
Subject: FW: LPA Reference: EIA/25/0006 Pre Application Meeting Request

Matthew Porter
Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB
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From: Active Travel England Planning [REDACTED]
Sent: 28 November 2025 15:08
To: Planning [REDACTED]
Subject: LPA Reference: EIA/25/0006 Pre Application Meeting Request

LPA Reference: EIA/25/0006

ATE Reference: ATE/25/01757/PREX

Site Address: Land West of Southwater, West Sussex

Proposal: EIA Scoping Opinion Request

Pre-Application Meeting Request

Dear Sir/Madam,

In relation to the above planning consultation, Active Travel England (ATE) currently offers a limited pre-application service for developments comprising 1,000 or more homes and/or a new school, where we are approached by the relevant local planning authority (LPA).

We are therefore keen to learn more about this development and would like to propose an introductory one-hour meeting via Microsoft Teams. The applicant's project team may also attend if the LPA considers this helpful. Following the meeting, ATE will provide a summary of its initial views and/or request further information as agreed. ATE requests that any subsequent meetings include the local highway authority, if they are not present at the first meeting.

If an introductory meeting can be arranged, please contact us at Planning-Consultations@activetravelengland.gov.uk with proposed dates and times for all attendees at least two weeks in advance. We will then allocate the meeting to a member of our planning team and confirm by reply.

In the meantime, ATE has produced a [standing advice note](#) summarising key active travel criteria that we will assess when consulted on a formal application. We have also published a [planning application assessment toolkit](#) to help gather evidence and assess the active travel merits – walking, wheeling and cycling – of a development proposal.

Where the submission includes proposed plans of the site, ATE requires the applicant's design or transport consultants to submit a completed toolkit prior to any engagement with us on this development.

Kind regards,



Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram [@activetravelengland](https://www.instagram.com/activetravelengland) and on [LinkedIn](#)
]]>

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Nicola.Mason

From: Matthew.Porter
Sent: 15 December 2025 15:48
To: Matthew.Porter
Subject: FW: Planning Application Consultation - EIA/25/0006

Matthew Porter

Principal Planning Officer



Horsham District Council, Albery House, Springfield Road, Horsham, West Sussex RH12 2GB

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Please contact us in advance if your email, including any attachments, is going to exceed 30MB.

From: Olivia Wojniak [REDACTED]
Sent: 05 December 2025 11:49
To: Matthew.Porter [REDACTED]
Subject: RE: Planning Application Consultation - EIA/25/0006

Hi Matthew,

Hope you are well.

I have spoken about this with my soils colleagues and they have come back with the following:

This will really need a consultation from the national stakeholder, Natural England. We would likely state the same as them e.g. defining how a survey should be conducted.

We work pretty closely with WSP on a range of projects, providing work from surveys to Scoping/ES inputs.

If you have any questions please feel free to contact Alex Mitchell [REDACTED]
[REDACTED]

Thanks,

Olivia