

James Bank
Turley
BY EMAIL ONLY

Our ref: EIA/26/0003

Your ref:

Date 09-03-2026

Dear James Bank,

Request for a formal EIA Scoping Opinion for the proposed development at Land West of Billingham West Sussex

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 West of Billingham. 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 2.7 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. This detail appears separated, at Chapter 4 High Level Development Specification.

Environment Statement (ES) Approach

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

HDC has set out in this Opinion where it has/ has not agreed to scope out certain Aspects/Matters based on the information 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 this Scoping Opinion is informed through effective consultation with the relevant consultation bodies. Unfortunately, currently HDC is not in

receipt of all consultation responses. The full comments of the consultee responses received to date are attached], with the full list of consultations undertaken set out [Appendix 1]. No third-party representations have been received.

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

Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through planning conditions or obligations (or other suitably robust methods) and whether relevant consultation bodies agree on the adequacy of the measures proposed.

Scope of Assessment

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 2.4 – 2.6 of the Scoping Report.

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

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

Baseline Scenario

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

The concept of 'future baseline' conditions is introduced in the context of several aspect chapters (e.g. traffic, landscape, air quality and ecology). Considering the number of ongoing developments within the vicinity of the Proposed Development application site, and potential evolution of the 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 to assess the potential impacts upon each receptor. HDC expects a transparent and reasoned approach to be applied to assigning receptor sensitivity to be defined and applied across the aspect chapters.

Forecasting Methods or Evidence

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

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

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

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

Residues and Emissions

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

provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

Mitigation and Monitoring

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

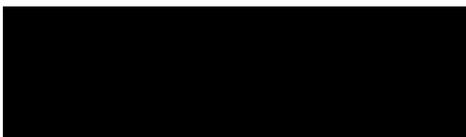
The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

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

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

ASPECT BASED SCOPING TABLES are set out overleaf.

Yours sincerely,



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

WSCC Public Right of Way

HDC Landscape Architect

HDC Environmental Health (Noise, Pollution, Air Quality)

HDC BNG Ecologist

HDC Archaeological Consultant (Surrey County Council)

HDC Design & Conservation Advisor

HDC Strategic Planning

HDC Consultant Ecologist

HDC Tree Officer

HDC Business Development Officer

Awaited/ No response received:

Chichester District Council

Network Rail

HDC Agricultural Consultant (Reading Agricultural Consultants)

HDC Environment Management, Waste and Cleansing

HDC Leisure, Parks & Communities

HDC Housing Department

Health and Safety Executive

Wey and Arun Cancel Trust

WSCC Education Services

WSCC Libraries

WSCC Community Crime Prevention Department

WSCC Social Care and Health

WSCC County Fire Officer

WSSC Community Safety

Department of Culture, Media and Sport

NHS West Sussex Clinical Commissioning Group

EIA/26/0003 Horsham District Council. Aspect Based Scoping Tables
EIA Scoping Opinion for the Proposed Development at Land West of Billinghamurst

Item	Chapter	HDC comments
1.	1. Introduction	It would be useful if the scoping report had an executive summary.
	2. 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> <p>HDC would like to it understood how local communities within the Scoping Boundary have been consulted upon to help provide local input.</p> <p>There is no reference to community engagement at all in Appendix 1.1: Record of Consultation.</p>
	Para 2.7. 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> <p>Should cross reference Chapter 4. High Level Development Specification</p>
	Para. 2.18 <i>Where required, technical specific study areas</i> Para. 2.21	It would be useful to show the relevant Scoping Boundary (study areas) on a map as Appendix.

<p>Para. 2.30 Defining Mitigation and how this will be Controlled. and Consideration of Off-Site Mitigation</p> <p>2.38 Off-site improvements/mitigation are likely to be limited to highway improvements, which will be understood when junction modelling is undertaken.</p> <p>Appendix 2.1: Preliminary Environmental Management Plan</p>	<p>Primary mitigation – modifications to the location or design of the Proposed Development made during the pre-application stage that are an inherent part of the project; • Secondary mitigation – actions that will require further activity in order to achieve the anticipated outcome and secured by planning condition / and or obligation; and • Tertiary mitigation – actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements or actions that are standard practices used to manage commonly occurring environmental effects.</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. However, certain matters are not addressed in this way (such as identification of veteran trees - see comments further below).</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 whilst it is appreciated the Environmental Management Plan at Appendix 2.1 is preliminary, many of the measures included in it are ambiguous.</p> <p>It is therefore difficult for HDC to gain confidence as to the likely efficacy of such plans at this stage. However, the ES should therefore set out these plans (or the reliance placed on them) in sufficient detail so as to understand the significance of residual effects. This should also include identification of any monitoring and remedial actions (if relevant) in the event that predicted residual effects differ to actual monitored outcomes.</p> <p>With that in mind, HDC advocates far greater precision and detail of clarity to the precise measures being identified, especially in the Environmental Management Plan. 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>
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		<p>There is currently ambiguity in phraseology used and cross referenced elsewhere in the ES, such as at paragraph 4.8 <i>Boundary trees and hedgerows will also be subject to removal where it is required for access and infrastructure.</i></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> <p>For example, the site is located to the west of Billinghamurst and is predominantly agricultural in use. It is enclosed by a network of mature hedgerows with intermittent hedgerow trees, small woodland blocks (notably Pratt's Copse and Eaton Copse adjacent), and tree-lined boundaries. These features are typical of the site's rural setting, and collectively they form an established green infrastructure framework, contributing to landscape character and ecological connectivity within the area.</p> <p>The Scoping Report refers to woodlands and hedgerows on several occasions, reflecting their presence within the baseline description of the site. Trees are also referred to in the context of boundary features, landscape structure, and proposed green infrastructure. However, there is no substantive reference to veteran trees, nor any dedicated assessment of their potential presence, which is highly likely given the rural context of the site and the high likelihood of over-mature hedgerow oaks within field boundaries.</p> <p>The boundary hedgerows identified in the report appear to be mostly composed of mixed native species, with mature standards including oak and field maple evident in parts. These hedgerows are therefore likely to qualify as "important" under the Hedgerow Regulations 1997 in places, subject to survey confirmation.</p> <p>Tree and Hedgerow Resource Observations Highlighted in the Report</p> <p>The Scoping Report anticipates potential removal of sections of hedgerow and boundary trees to facilitate access points, internal road alignments, and development plateaus. While some loss may be unavoidable, the extent and justification of any removal would need to be substantiated by an Arboricultural Impact Assessment (AIA) report.</p>
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		<p>Potential impacts on retained trees have been highlighted in the report, and it advises that tree conflicts could arise from construction incursions, soil level changes (up to $\pm 4\text{m}$), and groundwater management if Root Protection Areas (RPAs) are not respected.</p> <p><i>Veteran and Notable Trees Observations Highlighted in the Report</i> There is no specific reference to veteran or ancient trees within the report, as such. However, given the scale and rural setting of the proposal, as mentioned previously there is a reasonable likelihood of over-mature field boundary oaks or former hedgerow standards exhibiting veteran characteristics. Such trees would represent high ecological and amenity value and would be defined as irreplaceable habitats within the NPPF (2024).</p> <p>Therefore, early identification of these trees would be necessary, and appropriate buffering would be a requirement of any forthcoming application. Development within veteran tree buffers or beneath crown spreads could not be supported, and such areas would require additional protection measures during the build-out and post-development stages.</p> <p><i>Woodland Observations Highlighted in the Report</i> Adjacent woodland blocks (Pratt's Copse and Eaton Copse) contribute significantly to landscape and ecological value. Although these appear to be located outside the main Built Development Areas, indirect impacts such as edge effects, lighting, hydrological changes, and recreational pressure may arise.</p> <p>The proposed additional woodland planning and a country park are positive in principle; however, new planting cannot substitute for established woodland or mature tree cover. Where these features are present, they should be retained, reinforced, and appropriate Ancient Woodland (AW) buffers would be required.</p> <p><i>Arboricultural Considerations for Any Forthcoming Application</i> Subject to further assessment, the development appears capable of accommodating existing trees and woodland while respecting key features, provided design and mitigation measures are considered early. Key considerations include:</p> <ul style="list-style-type: none">• Identification and protection of RPAs for retained trees and hedgerows.• Avoiding built development or infrastructure within RPAs wherever practicable or treating such interventions as exceptional and well justified.• Maintaining adequate spacing between retained trees and new buildings to allow for growth and ongoing management.
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		<ul style="list-style-type: none"> Considering soil conditions typical of the Low Weald (clay soils), which may be susceptible to post-development shrink–swell, to manage potential subsidence risks near retained trees. Early arboricultural input will help inform layout, foundation design, and planting strategies, supporting long-term compatibility between retained trees, hedgerows, and the proposed development.
	3. Site Context	Para 3.2. The local authorities for the site are Horsham District Council and Chichester District Council.
	4. High Level Development Specification	<p><i>Para 4.18 Land Use and Quantum</i> Please specify square foot/metre of community centre Number of pitches in traveller site Square foot/metre of Country Park Square foot/metre of public open space</p>
	Para. 4.38 <i>Construction is anticipated to commence on Site in 2027, subject to gaining planning permission. The Proposed Development will be delivered in a phased manner and, whilst subject to market demand, completion and occupation is anticipated in 2037.</i>	As the construction is likely to be phased over several years, this potential scenario will need to be assessed within the EIA.
	5. Technical Topics which are Not Significant	<p>Cross reference to Chapter 16.1. With respect to the areas which are stated do not require their own chapter:</p> <ul style="list-style-type: none"> <i>Lighting</i> – 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 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. <i>Major Accidents and/or Disasters</i> – HDC agree 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>• <i>Minerals and Waste</i> – HDC accepts these do not need their own chapters and can be addressed within the Socioeconomics. This is contingent upon the following being addressed with Socio-Economic and Human Health topic chapter of the ES</p> <p><i>Minerals</i> The submitted Scoping Report identifies the location of the application site within the mineral safeguarding area for brick clay and concludes that the sterilisation of the underlying mineral resource would not be significant when considered within the context of existing reserves and the abundance of the resource across the county. Whilst the Minerals and Waste Planning Authority would agree that the priority of the safeguarded resource is relatively low, the development site occupies a significant area (106.29ha), and the potential quality and quantity of the underlying resource remains unknown at this stage. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 at the application stage and a Mineral Resource Assessment should inform any environmental statement at the application stage.</p> <p><i>Waste</i> 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.</p> <p>With regards to safeguarded waste infrastructure; the development should be designed in such a way as to reduce any potential impacts arising from the existing waste operations at the Billinghamurst HWRC on future adjacent land uses, as per the agent of change principle, to ensure the waste management infrastructure can continue operations within its permitted capacity/permits. This should be demonstrated through the submission of a Waste Infrastructure Assessment at the application stage, to be informed by the Minerals and Waste Safeguarding Guidance (see 3.4).</p> <p>Waste on-site Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear.</p> <p><i>Agricultural Land and Soil Resources</i> HDC accepts these do not need their own chapters and can be addressed within the Socioeconomics. This is contingent upon the following being addressed with Socio-Economic and Human Health topic chapter of the ES:</p>
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		<p>The desk based assessment identified 1.84ha of Grade 3a land on the Site which is classified as BMV. The NPPF does not specifically state the scale of development that would be considered significant in terms of BMV land. However, as a good indication, the Town and Country Planning (Development Management Procedure) Order (2010) requires Local Planning Authorities to consult DEFRA on development that would involve a loss of 20ha or more of Grades 1,2 or 3a land. The loss of BMV land is therefore not considered significant for the Proposed Development and would not contravene relevant National Planning Policy.</p> <p><i>Ground Conditions and Contamination</i> HDC accepts these do not need their own chapters and can be addressed within the Socioeconomics. This is contingent upon the following being addressed with Socio-Economic and Human Health topic chapter of the ES:</p> <p>Needs to be demonstrated environmental constraints data sets (Source Protection Zones; Potentially contaminated land; Safeguarded minerals and waste sites/infrastructure (those already built) used to feed into process at this stage</p> <p>The Council EHO is satisfied with the preliminary assessment of the risk from contamination to future site users, as presented in the Ground Condition Consultants Ltd Ground Condition Desk Top Study, dated March 2025. It is acknowledged that the site is primarily undeveloped land but there is still a need to consider ground conditions on the site. Therefore, agree with conclusions in the Ground Condition Consultants Ltd Ground Condition Desk Top Study, dated March 2025 in that to fully quantify the risks from contamination to future site users some ground investigation works, including testing of soils, is required on the site.</p> <p><i>Land contamination</i> Risk management and good practice. It is recommended developers should: • follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination. This guidance describes the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health. • consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed • refer to the contaminated land pages on gov.uk for more information</p> <p><i>Soils</i></p>
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		<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. 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 offsite impacts.
	<p>6. Transport and Access</p>	<p>Needs to be demonstrated environmental constraints data sets PRowWs (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>The methodology set out in chapter 6 is noted. 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 the Local Highway Authority (WSCC) and any mitigation or scope with the potential for additional junctions/links within Billinghamurst village centre and train station.</p>
	<p>7. Air Quality and Odour</p>	<p><i>Air Quality</i> From an air quality perspective, it is important the CEMP in the ES includes dust and emissions controls as well as monitoring, reporting and compliance.</p>

		<p>HDC requires that all major developments need an Air Quality Assessment (AQA) regardless of the anticipated Air Quality impact. The AQA should be included in the EIA and should cover:</p> <ul style="list-style-type: none"> • Description of the development & planning context • Baseline air quality review • Construction phase assessment • Traffic impact assessment • Identification of sensitive receptors • Dispersion modelling • Damage cost calculations • Mitigation strategy <p>Please refer to the DEFRA Air quality appraisal: damage cost guidance, the Sussex Air guidance and IAQM guidance for help with this.</p> <p>Additionally, all developments that require an AQA, need to provide evidence that they have minimised PM2.5 emissions, and provided appropriate mitigation, in line with the DEFRA PM2.5 Interim Guidance.</p> <p>The scoping report mentions no meteorology in the modelling and relies only on worst-case DMRB screening. This is inadequate for a development of this size and location and should be upgraded to full dispersion modelling in the ES.</p> <p>The applicant needs to justify the odour assessment in relation to the IAQM guidance. The chosen significance threshold of 3.0 ouE/m3 is lenient for new residential development and should be reconsidered. Particularly in the area adjacent to Billingshurst recycling centre. As receptor sensitivity is likely to be high in the area close to the recycling centre, a maximum Odour Exposure Level of 1.5 ouE/m3 is likely to be more applicable.</p>
	<p>8. Noise and Vibration</p>	<p>In reference to Chapter 8 of the EIA titled 'Noise and Vibration', Baseline Daytime Noise Modelling from Extrium dated 19 January 2026, Baseline Nighttime Noise Modelling from Extrium dated 19 January 2026, and Proposed Noise Monitoring Locations dated 19 January 2026.</p> <p>Certain parts of the proposed development are near the heavily trafficked A272, the Billingshurst Recycling Centre and industrial units at Platts Roundabout, the latter of which has recently been given permission for 24-hour use – noise from these offsite sources are therefore potential constraints to development. It is noted that whilst there is some commentary in relation to these in sections 8.2 and 8.3 there is no detail on whether they will be scoped in or scoped out.</p>

		<p>With reference to sections 6.6.2 and 6.6.4 of the Sussex Planning Noise Advise Document, dated November 2023, and the ‘agent of change’ principle’ clearly applies in this situation – the above-mentioned noise sources therefore need to be scoped in.</p> <p>It is noted that section 8.7 provides commentary on the Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Existing Human Receptors. Noted is the comment ‘It is not expected that there will be significant effects of noise from these sources on existing residential properties, even from fixed plant or deliveries at night, as there is a minimum of either the A29, the A272 or a 100m distance between these noise sources and existing residents. Given the absence of a plan which clearly shows the location of the proposed commercial elements in relation to existing residential the Council is unable to confirm this.</p> <p>It is accepted that noise from School, Community Hub, Sports Facilities on existing human receptors can be scoped out. However, given the potential for LAmox noise events from the commercial elements the Council is not currently able to support the scoping out of commercial elements on existing human receptors.</p> <p>Section 8.8 provides commentary on the Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Future Human Receptors. Comment ‘Noise from fixed plant or deliveries at night from the commercial elements would not be detectable at the proposed dwellings as there is a minimum of either a 10m internal road or 10m distance between these noise sources and proposed dwellings. Given the distance quoted (10m) and, with reference to the relevant sections of Sussex Planning Noise Advice Document, the nature of noise associated with the commercial element (typically LAmox events) it is not agreed that noise from the commercial element on future human receptors will not be significant.</p> <p>The Council is satisfied for noise from operational use of the school, community hub and sports facilities on future human receptors to be scoped out, noise from operational use of the commercial elements on future human receptors does however need to be scoped in.</p> <p>Sections 8.9 and 8.10 provide commentary on noise and vibration on existing or future sensitive human receptors with both being scoped out. This is a multi-phase development which will be built out in stages, HDC therefore consider it likely that both existing and future residents will be impacted by noise and vibration associated with construction and it is not agreed with the comment that they are not considered significant – both should be scoped in.</p>
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		<p>Detail on the proposed noise background monitoring is detailed in sections 8.12 to 8.20 which is welcomed. Given the proposed commercial elements of the development and existing commercial elements, as detailed above, and with reference to sections of the Sussex Planning Noise Advice Document, the noise assessment should also include an assessment in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.</p>
	<p>9. Biodiversity</p>	<p>The development site is within or may impact on the following European/internationally designated nature conservation site(s): The Mens Special Area of Conservation Arun Valley Special Protection Area/Special Area of Conservation/Ramsar Water Supply</p> <p>The development site is within or may impact on the following Site of Special Scientific Interest: The Mens Upper Arun Coppedhall Hanger</p> <p>Parcels of ancient woodland (irreplaceable habitat) border the site, so Government Standing Advice needs to be followed.</p> <p>A non-statutory designated site: Local Wildlife Site (LWS) C89/ H46: Wey & Arun Canal, River Arun & adjacent meadows is located west of the site boundary.</p> <p>It is important that full consideration to the above nature conservation sites is given. The site lies approximately 6.5km west of The Mens Special Area of Conservation (SAC) (MAGIC maps) is therefore within the 6.5km Key Conservation Area for this SAC, within which all impacts must be assessed as the habitats within this zone are considered critical for sustaining the populations of Barbastelle bats within the SAC, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 6.6km west of Ebernoe Common Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for this SAC, the desk study returned one record for Bechstein's bat located within 2 kilometres of the site.</p> <p>It is therefore important that The Mens SAC is scoped in given the findings of the emerging Local Plan's HRA and Air Quality Addendum. By way of reasoning and likely issues these include not just bats but also potential effects of nitrogen deposition from combustion engine motor traffic whereby if the</p>

		<p>Transport Assessment concludes the number of HGVs using the A272 at the Mens SAC will increase to or above 200 HGVs per day then measures will be necessary to reduce this to less than 200 or ensure Euro6 standard compliance; ammonia given that the emerging Local Plan's HRA identified an issue with ammonia at The Mens SAC resulting in the strategic allocation at Land East of Billingshurst being required to provide electric vehicle charging points for all car parking spaces. It is recommended regard be given to the requirements of the HRA in respect of the emerging Local Plan's strategic allocation of Land East of Billingshurst and the resultant policy HA4 requirements. It should be noted that these are considered soft measures and if not implemented then a charge on developers may be required for hard measures to be put in place, and monitoring of vehicles undertaken along the A29 past The Mens SAC.</p> <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. This includes Wilder Horsham, Weald to Waves, emerging West Sussex LNRS, Biodiversity Opportunity Areas (BOA).</p> <p><i>Baseline Information</i> The desktop assessment has been prepared in consultation with the Sussex Biodiversity Record Centre (SxBRC) – accessed under licence and these records inform the survey requirements. Protected and Priority species have been considered adequately. Records from new or updated surveys undertaken should be shared with the local record centre. HDC support the preparation of the desktop study using biological data from new or updated surveys undertaken should be shared with SxBRC and other relevant local record centres.</p> <p><i>Methodology</i> HDC is satisfied that nationally agreed guidelines have been followed for the ecology surveys and all survey work has been undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species should meet the requirements of Natural England Standing Advice. In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation. Any report on Badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.</p> <p><i>Surveys</i></p>
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		<p>The submitted EIA Scoping Report (ISEP, January 2026) states site-specific surveys have been undertaken, and it is currently under consideration whether further updates are required to support an application. Below is a summary of approximate surveys and when they were conducted from the information provided:</p> <ul style="list-style-type: none"> • Hedgerow Regulations Survey – conducted in 2023, the results of these surveys are still considered valid. • UK Habitat Survey – conducted May 2025, the results of these surveys are still considered valid. • Bat activity static and transect – conducted 2023, see comments above. Supplementary updated surveys are advisable. • Advance survey techniques, bat trapping – conducted 2023, updated surveys are not considered necessary. • Bat surveys (emergence, PRA and GLTA) – updated conducted 2025, see comments above. • Dormouse surveys – Conducted 2023, only three potential nests were returned from those surveys. Section 3.5.7 of the Hazel Dormouse Mitigation Handbook (Wells, D et al, 2025) regarding repeat surveys, states these should be carried out if any of the following apply - Five years have elapsed since the previous surveys; - There has been significant change in the management of dormouse habitat in the surrounding area which might have caused Dormice to move into the site; - There are new records in the area; - There has been significant change in the habitat quality on the site. The applicant should use the above to determine whether supplementary updated surveys, in line with the latest survey techniques, which could include footprint tunnels, will be required. • Breeding bird surveys – Conducted 2023, given the scale of the site and the large scale loss of agricultural land, updated supplementary surveys are considered advisable particularly for Priority farmland birds. • Winter Bird Surveys – currently being undertaken. These will be in date and valid for a 2026 application. • Badger – results relating to Badger activity are considered valid for 12 months only. Any Badger report needs to be marked confidential or text in the ES will need to be redacted. • Reptiles – Conducted 2023, the surveys identified Grass Snake and there was an incidental, lost record for Common Lizard. The applicant should provide sufficient justification as to why updated surveys are not considered necessary and an outline mitigation and compensation strategy should be provided. Reasonable mitigation measures will need to be identified for the construction process which will then need to be secured by a condition of consent. <p><i>Protected and Priority Species</i> <i>Great Crested Newts GCN</i></p>
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		<p>The development falls within the amber impact risk zone for GCN. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the amber impact zone, there is suitable habitat and a high likelihood of great crested newt presence. - There are at least 19 ponds within 500m of the development proposal, 4 of which are located onsite. - There are historical and recent great crested newt records onsite and within 50m of the development site - There is direct connectivity between the development and surrounding features in the landscape.</p> <p>Further information is recommended to be submitted alongside future applications in relation to GCN. The above report has undertaken presence/absence in 2023 (negative) and eDNA surveys in 2022 which demonstrated evidence of GCN presence on site. It is likely that either a licence or updated/further surveys will be required for this site. Should the applicant wish to avoid undertaking further surveys, they also have the option of enquiring in to Horsham District Council's District Licence, which provides full legal cover for any impacts to great crested newts and therefore removes the risk of having to stop works if great crested newts are found on site. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com</p> <p><i>Bats</i></p> <p>It is noted that barbastelle bats were recorded as being present on-site, a rare protected species listed under Annex II and Annex IV of the Habitats Directive. Their activity was mainly identified along hedgerows and field margins. The entirety of the site falls within the 6.5km key conservation area for The Mens SAC and 12km wider conservation area for Ebernoe Common SAC. One of the qualifying features for the SACs is Barbastelle Bats. Given these bats are highly light-averse and utilise wooded river valleys, riparian meadows, broadleaved woodland, hedgerows, field margins and lines of trees for foraging, it is important that these habitats on and off site are not illuminated or fragmented to avoid cutting connectivity across the landscape. This is particularly important with regards to the residential areas and sports area that are likely to have the greatest lighting impact. Further detail will therefore be required to inform any HRA & AA.</p> <p>However, the bat activity surveys (static) did return Barbastelles utilising the site in low numbers. No European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site (MAGIC maps) which included Barbastelle. There is one granted licence from 2016 which included Common Pipistrelle, Soprano Pipistrelle and Whiskered Bat. There are approximately 47 records of bats within 2km of the site, including Serotine, Noctule and Brown Long-eared Bat (SxBRC – accessed under licence). The site lies approximately 7.7km north of Arun Valley SAC, SPA and Ramsar site. Bat activity surveys (transect and static detector) were last conducted in 2023, as was the advanced survey</p>
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		<p>technique bat trapping. The submitted information states the applicant is aiming to apply for this site Autumn 2026, additionally it is stated that the Shadow Habitats Regulations Assessment (sHRA) is currently being produced. Given the scale of the proposals, age of the survey data and location of the site in relation to Habitat sites, within key conservation areas, updated, supplementary activity surveys are considered advisable to inform the sHRA and impacts upon qualifying species (Barbastelle and Bechstein bat). Significant impacts or severance to flightlines must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement) and details of avoidance, mitigation and compensation measures provided. This information will be required to inform the Council's project level HRA. The results of the Preliminary Roost Assessment, emergence surveys and Ground Level Tree Assessment are in date and would be sufficient to support an Autumn 2026 application. However, noted the submitted Appendix 9.1E: Roosting Bat Report does not clearly indicate why only some of the PRF-M trees were subject to further surveys so all trees likely to be affected need assessment and this information will be required to inform the LPA's project level HRA.</p> <p><i>Dormouse</i> The presence of dormouse was recorded on-site, with nests identified in the hedgerows, and common lizard and grass snake were recorded in the field margins and hedgerows. As such it is essential that the connectivity on-site and with the wider landscape is maintained and enhanced, with breaks in hedgerows for access purposes kept to a minimum. It is noted that the creation of woodland and hedgerow will provide suitable habitat for these species. If required, any reptile receptor sites will need to be communicated to the Case Officer prior to grant of planning permission.</p> <p><i>Hairstreak butterfly</i> It is also noted that habitats will be enhanced to provide for the 'Hairstreak butterfly' present on site. Further detail will be required as to what hairstreak butterfly species have been recorded on site, and specific enhancements for each species identified.</p> <p><i>Irreplaceable and Priority Habitats</i> The proposed artificial football pitch is located adjacent to a fishing pond and appears to be alongside a watercourse, with the watercourse skirting the ancient woodland (AW) edge (AW denoted by striped areas in MAGIC map image below) approximately 100m away from the pitch. The pitch is also approximately 95m away from the nearest parcel of priority woodland (lowland mixed deciduous woodland, green shaded areas in MAGIC map image below). As such, there are many sensitive habitats near this pitch location. At this stage, it is not clear on what type of pitch is being proposed, however there are initial concerns with regards to microplastic / infill and artificial lighting pollution.</p>
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		<p>is strongly advised that if the applicant pursues this area of enhancement considering the above comment, the enhancements should aim to retain/return to this classification and retain the ecological function as a floodplain.</p> <p>In addition, further consideration will be required as to what the impacts (positive or negative) will be on these sites/habitats. Given the reliance on this habitat type by many waterfowl species, such as Bewick's swan which is a qualifying feature for the nearby Arun Valley SPA (also a SAC, Ramsar and SSSI), it is advisable to balance this with recreational access in this area of the country park and improved access to the Arun-Wey canal. This is also important for the proposed enhancements to the grassland habitats within the proposed country park that will provide continued habitat for ground nesting birds such as skylark. Consideration will therefore need to be given to balance proximity of the Renegades Youth Club and these proposed enhancements for biodiversity.</p> <p>It is further advised that there should be a balance of meadow grassland and modified grassland across the site for amenity purposes. The modified grassland should be offered for recreational purposes such as ball games and informal sports activities; to alleviate pressure on any proposed other neutral grassland to ensure it reaches the habitat classification and target condition.</p> <p><i>Hedgerows</i> 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.</p> <p><i>Proposed landscape belt</i> There is concern that given the proximity of the proposed development to the existing Pratt's Copse and proposed landscape belt, 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. The barriers should be in the form of a buffer containing native spikey species such as hawthorn, blackthorn, dog rose etc. Post-and-rail fencing may also be considered, particularly in sparse areas such as where the overhead lines run over the site.</p> <p><i>Orchard</i> It is noted that an orchard is proposed, as denoted by number 13 on the Illustrative Map. Consideration will be necessary as to whether this will classify as traditional orchard or individual trees within the metric for BNG purposes. If the former, the habitat will need to meet the UK BAP habitat description and</p>
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		<p>therefore clear and detailed management will need to be provided to assure HDC how this classification and the proposed target condition will be met.</p> <p><i>Strategic significance</i> A large proportion of the proposed country park and north of the site (opposite Hilland industrial estate) is located within The Mens and Buffer Associated Barbastelle Flightlines Biodiversity Opportunity Area (BOA). As such, in the absence of a published LNRS, all habitats as listed within the BOA profile should be assigned as having a high strategic significance in this area within the metric. All other habitats within these areas also fall within the Wilder Horsham District Nature Recovery Network, and as such any other habitats with a biodiversity value greater than zero should be assigned medium strategic significance.</p> <p><i>BNG</i> The proposal states the development will have a 55.02% gain in area-based habitats, a 36.30% gain in hedgerows, and a 33.71% net gain in watercourses. As such, this is likely to be significant on-site BNG and therefore will require a S106 legal agreement to secure for 30 years. Monitoring reports will typically need to be submitted to HDC in years 1,2,5,10,15,20,25 and 30, unless otherwise stipulated. If the applicant wished to sell any excess units through registering as a Habitat Bank, it is requested that the applicant inform the Case Officer early in the planning process. For successful validation, the following documents will need to be provided in addition to the minimum national requirements, to satisfy the HDC local validation list: BNG Statement (a report that communicates the baseline information of a site, and a statement of intent on how the development proposes to fulfil the BNG requirement) Habitat survey report and map (to support the baseline calculation, including the habitats identified on site and the corresponding botanical species lists. Pre- and post- development habitats must also be mapped, with a clear arrow pointing in the direction of North) Biodiversity metric (in both original Excel and PDF version) Condition assessment sheets (to evidence the baseline assessment, including River Condition Assessment reports to evidence the watercourse module of the metric) Draft HMMP (does not need to be extensive, but should include how the development intends to manage the proposed habitats to achieve the target condition criteria for each habitat parcel by year 30)</p>
	<p>10. Landscape and Visual Amenity</p>	<p><i>Effects Unlikely/Not Significant:</i> Changes to character and the setting of the national landscape; Changes to views out from the national landscape; Changes to night-time views from the national landscape [South Downs National Park, visual receptors within the national park, including recreational walkers]</p>

		<p>Please note the locations for the SDNP views 1-4 could not be located within the submitted information. Whilst HDC is satisfied these views can be scoped out from the EIA, the location of the views should be added to the scoping package for completeness and in the interest of third parties Study area:</p> <p>The scope within 1km from the site boundary is agreed with provided the study area remains as indicated in DWG no PA01, which include viewpoint 27.</p> <p><i>Assessment of visual effects:</i> With regards para 10.41, please note Type 3 visualisations are considered proportionate for this type of project and will be expected for most of the agreed viewpoints. HDC is satisfied however to agree these through further consultation as suggested.</p> <p><i>Assessment scenarios:</i> Please consider as part of the mitigation strategy if there are opportunities to deliver early planting buffer zones (alongside site set up), where enhancement of existing boundaries is required and these areas are protected from construction due to RPA protection for example. This could be favourable to reduce some of the adverse effects identified at Year 1.</p> <p><i>Detailed Methodology – Appendix 5.</i> The methodology correctly identifies that the effects can be positive, adverse or neutral however table A-11 provides definitions for what appear to be major, moderate and minor adverse effects. It is suggested that these are refined and/or additional definitions added for what is considered to be positive effects.</p>
	<p>11. Archaeology and Built Heritage Table 6.1</p>	<p>Scoping Expected the ES include a thorough assessment of the likely effects on those elements that contribute to the significance of these heritage assets. While there are no listed buildings or scheduled ancient monuments within the site boundary, the site forms part of the wider setting of several designated heritage assets. The main potential impacts therefore relate to changes to the significance of these assets arising from alterations to their settings. Accordingly, inclusion of archaeology and built heritage within the proposed EIA scope welcomed. Heritage assets within 1 km of the site have been identified. The principal designated assets that may be affected are those along the A272 and Lordings Road, to the south-west of the site, all of which are grade II listed: - Hole Cottage (LEN 1027101) - Lime Burners Arms Public House (LEN 1356651) - Diggles (LEN 1354125) - Newbridge Cottage (LEN 1192793) - Newbridge Farmhouse (LEN 1027102) - Wynstrode Farmhouse (LEN 1286440).</p>

	<p>Para 11.29 Conservation Area effects arising through change to setting ...</p>	<p>With reference to the proximate Billingshurst Conservation Area, the scoping report concludes that this would not be affected by the development due to intervening built form, topography and planting, which prevent intervisibility and limit any contribution from the site to its character or appearance. On this basis, no impact assessment is proposed.</p> <p>However, Historic England and the District Conservation Office note the Billingshurst Conservation Area Appraisal (January 2018) identifies a landscape fringe to the north-west of the conservation area boundary - part of which lies within the south-eastern boundary of the site – as having medium sensitivity to change. This area includes peripheral vegetation associated with the grade II listed Manor House (LEN 1380083), as well as allotments and open green space containing some intact landscape features west of the bypass. These spaces help maintain the rural character of the historic village core and preserve visual links to the surrounding countryside, thereby contributing to the conservation area’s setting. The Appraisal also identifies glimpsed views of the grade I listed St Mary’s Parish Church (LEN 1354139), particularly its spire, from this fringe. Notably, vantage point ‘a’ on the public footpath at the north-west edge of Billingshurst provides important combined views of the Church spire and the Manor House.</p> <p>On this basis, Historic England disagree with the conclusions of the scoping report and consider that the impact assessment should include an evaluation of the development’s effects on the Billingshurst Conservation Area through potential changes to its setting.</p> <p>Baseline Methodology We support the proposed baseline methodology, including preparation of a Heritage Assessment to accompany the ES, which should provide a thorough evaluation of the heritage significance and setting of all assets within the study area that may be affected by the development. The ES should also consider potential impacts on nondesignated features of historic, architectural, archaeological or artistic interest, as these may also be of national importance and contribute to the local character and distinctiveness of an area and its sense of place. It is essential that the assessment ensures all impacts are fully understood. Sectional drawings and photomontages can be particularly valuable in this regard. The assessment should also address the effects of associated activities - such as construction, servicing, maintenance and traffic - on the perception, understanding and appreciation of heritage assets. Where relevant, it should also consider any changes to drainage patterns that could lead to decomposition or destruction of archaeological deposits or cause subsidence of buildings or monuments. We strongly recommend early engagement with your Conservation and Archaeological Officers.</p>
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		<p>To identify: Opportunities to avoid or minimise impacts; appropriate mitigation measures; and potential wider benefits for the future conservation and management of heritage assets.</p> <p>Archaeology The application area is well over the 0.5ha area that would require the results of a search of the West Sussex Historic Environment Record to be provided. The Environmental Impact Assessment Scoping Report produced by Turley includes a figure showing the results of the HER search and includes a short section on Archaeology that notes that there are no designated archaeological assets on the site, the site is not within an Archaeological Notification Area and has a generally uncertain potential, although previous work in the area, particularly in the south east of the site during construction of the Billinghamurst Bypass suggests that there is an elevated potential for prehistoric archaeology and so there is some potential for as yet unknown archaeological remains to be present. Due to the potential for archaeology to be present then further work will be required to inform the EIA. This should take the form of a comprehensive desk-based assessment of the site which should be informed by a geophysical survey of the development area. This would best take the form of a magnetometry survey supplemented by a multispectral drone survey to give an initial indication of whether archaeological features are present. If potentially significant features are revealed, then some targeted trial trenching prior to determination of the application may also be required. This work will enable an informed decision to be made on the nature, extent and significance of the archaeological resource and inform any mitigation measures which may be required</p>
	<p>12. Water Environment</p>	<p><i>Flood Risk</i> Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage. It is suggested the proposed masterplan is overlaid with the Flood Zones and Surface Water Flood Risk mapping, to demonstrate how the sequential approach has been used.</p> <p>It is highlighted there are requirements for a sequential approach to site design, particularly as this site is affected by both EA modelled flood zones and areas of modelled surface water flood risk.</p> <p>It would be expected the applicant to fully assess the risk of flooding from rivers and the sea both in the present day and with climate change as per the latest climate change allowances guidance. The applicant would be expected to fully mitigate against the design flood event including climate change.</p>

		<p>Any works within 8 metres of a Main River will require a Flood Risk Activity Permit through the Environment Agency. The Environment Agency and Council are unable to provide a more specific response until details of the development and proposed mitigation have been provided.</p> <p><i>Foul</i> In detailing mitigation of likely effects for foul, Southern Water confirms Southern Water has no objections in principle to this proposal, but await full drainage proposals & project details have been submitted for review.</p> <p><i>Surface Water</i> 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 it is accepted that the majority of the surface water related information will be included within any Flood Risk Assessment/Drainage Strategy provided with any substantive application. The LLFA have reviewed section 12 as of the submitted report insofar as it relates to flood risk and surface water drainage and have no reason to disagree with the conclusions reached therein.</p> <p><i>Drainage Strategy</i> 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>Needs to be demonstrated most up to date environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage.</p> <p><i>Groundwater</i> The Environment Agency is in broad agreement with the scoping opinion proposed in this report regarding groundwater and contaminated land. However we will note that we will likely request any application in the proposed area have conditions related to the prevention of mobilisation of possible</p>
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		<p>contamination, further ground investigation and the protection of groundwater, at the point at which planning permission is sought. Our advice and comments are based on the information available to us at the time of the EIA scoping opinion request. In regard to any further enquiries and/or information submitted relating to the proposed development, our position may change if there have been changes to environmental risk, evidence or legislation and/or to planning policy and guidance.</p> <p>Para. 12.35 Reference to water neutrality to be updated. There is still need to for Council to undertake Appropriate Assessment in regard to the Arun Valley Sites. Refer to HDC website https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p>
	<p>13. Socioeconomics and Human Health</p>	<p>Needs to be demonstrated environmental constraints data sets PRowS (not just National Trails) used to feed into process at this stage.</p> <p>HDC expects following elements to be demonstrated to have been considered:</p> <ul style="list-style-type: none"> • 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. • Collaborative support with the owners of the Lime Burners public house to support an important community facility and preserve the historic use of this listed building. Greater certainty of a collaboration in terms of supporting the pub business could mitigate the harm that might arise from the proposed development. • Engagement with the Wey-Arun Canal Trust, with potential for opportunities to support the canal restoration associated with the new access onto the PRow. • Waste and Mineral extraction considerations as previously identified in this response • Increased expenditure of the public purse to address increased recreational user pressure on PRow network This development impacts upon numerous Public Rights of Way (PRow) including Footpaths (FP) 1331, 1335, 1327, 1326, 1311, 1312, also Permissive path P42 and Bridleway (BW) 3668 crosses the A29 from site into Billingshurst. The site will have significant impacts on these both during construction and upon site occupation and measures must be considered as to how these will be mitigated for. 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. • Increased pressure on local facilities and services based on recent house large-scale building in Billinghamurst. Including sports and leisure provision and education

		<ul style="list-style-type: none"> • the relationship of the proposed new development to the economy (viability and vitality) of the Billinghamurst Village Centre in terms of access by its additional residents and the associated local retail/services that could be built in. • Gypsy and Traveller community <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>Paragraph 13.1 The site is located within the administrative boundaries of HDC and Chichester District Council</p>
	<p>14. Climate Change</p>	<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>
	<p>15. Approach to the Assessment of Cumulative Effects</p> <p>Table 15.1 Cumulative Projects</p>	<p>The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure (construction and operational phases)</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;

		<p>b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.</p> <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>Cumulative Effects should include:</p> <p>DC/20/2607 Outline Application for the development of 83 residential units, landscaping, access, parking and associated infrastructure on land at Duckmoor, East Billingshurst with all matters reserved except access. Land at Duckmoor East of Billingshurst Billingshurst RH14 9DZ</p> <p>DC/24/0768 Reserved matters application for the erection of 83No. dwellings, open space and child play provision, residential parking facilities and associated infrastructure, including access arrangements following outline application DC/20/2607, relating to layout, scale, appearance and landscaping. Land at Duckmoor Farm, East of Billingshurst Billingshurst RH14 9DZ</p> <p>Advice to be sought from the Local Highway Authority, in regard to junction capacity at Buck Barn (A24/A272), but the ES should identify recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590).</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</p>
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		<p>captured. It is considered this should include and take into account all permitted and allocated sites including those in the emerging Local Plan.</p> <p>Large-scale building in Southwater (Transport and Socioeconomic considerations (education provision)):</p> <p>DC/26/0366 Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure. Land North West of Southwater</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>The emerging Local Plan is at Examination stage which includes a strategic site allocation at Land East of Billingshurst which is not showing on the cumulative project plan. The strategic allocation at Land East of Billingshurst is for 650 dwellings (35% of which to be affordable), a permanent Gypsy and Traveller site for 5 pitches, community hub, c.0.5ha employment floorspace, provision for a 2 form entry primary school including provision for special education needs and early year facilities, open space and new station car park. It is considered too early to scope out the allocations in the emerging Local Plan. This would also feed into any in combination effects. Subject to comments from WSCC, this may have</p>
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EIA/26/0003 Horsham District Council. Aspect Based Scoping Tables
EIA Scoping Opinion for the Proposed Development at Land West of Billingshurst

		to include regard to the provision of a new secondary school within Billingshurst in light of the current capacity and the impacts from the cumulative housing numbers.
	16. Summary	No comments

From: Matthew.Porter
Sent: 03 March 2026 16:08
To: Matthew.Porter
Subject: FW: LPA Reference: EIA/26/0003 Pre Application Meeting Request

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: Active Travel England Planning <[redacted]>
Sent: 23 February 2026 15:44
To: Planning <[redacted]>
Subject: LPA Reference: EIA/26/0003 Pre Application Meeting Request

LPA Reference: EIA/26/0003

ATE Reference: ATE/26/00279/PREX

Site Address: Land West of Billingshurst, West Sussex

Proposal: EIA Scoping Opinion

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

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ref:a0zTw000007RK9uIAG;455e79d49735204c00982175a2d0c03b:ref]

Horsham District Council
Development Control
Park House North Street
Horsham
West Sussex
RH12 1RL

Our ref: HA/2026/127473/01-L01
Your ref: EIA/26/0003

Date: 20 February 2026

Dear Planning Officer,

Environmental Impact Assessment (EIA) SCOPING OPINION.

LAND WEST OF BILLINGSHURST, WEST SUSSEX.

Thank you for consulting us on the above EIA scoping opinion request.

We have reviewed the Information as submitted and set out our position and comments below.

Advice to Applicant and Local Planning Authority

Flood risk

We would expect the applicant to fully assess the risk of flooding from rivers and the sea both in the present day and with climate change as per the latest climate change allowances guidance. The applicant would be expected to fully mitigate against the design flood event including climate change. Any works within 8 metres of a Main River will require a Flood Risk Activity Permit through the Environment Agency. We are unable to provide a more specific response until details of the development and proposed mitigation have been provided.

Groundwater quality

We have reviewed the submitted scoping report. The following comments, made in respect of groundwater quality aspects of the water environment and contaminated land will help ensure that the environmental statement addresses the key environmental issues within our remit for this proposed development.

We broadly agree with the scoping opinion proposed in this report regarding groundwater and contaminated land. However we will note that we will likely request

Environment Agency

Teville Gate House 25 (Cafe) Railway Approach, Worthing Central, Worthing, BN11 1UR.

Customer services line: 03708 506 506

www.gov.uk/environment-agency

Cont/d..

any application in the proposed area have conditions related to the prevention of mobilisation of possible contamination, further ground investigation and the protection of groundwater, at the point at which planning permission is sought.

Our advice and comments are based on the information available to us at the time of the EIA scoping opinion request. In regard to any further enquiries and/or information submitted relating to the proposed development, our position may change if there have been changes to environmental risk, evidence or legislation and/or to planning policy and guidance.

We would like to refer the applicant/enquirer to our groundwater position statements in [The Environment Agency's approach to groundwater protection](#), available from gov.uk. This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Land contamination
- Drainage

Land contamination: risk management and good practice

We recommend that developers should:

- follow the risk management framework provided in [Land Contamination: Risk Management](#), when dealing with land affected by contamination. This guidance describes the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health.
- consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- refer to the [contaminated land](#) pages on gov.uk for more information

Waste on-site

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to the [waste management](#) page on GOV.UK.

We will consider any queries in relation to the use of [Definition of Waste: Development Industry Code of Practice \(DoWCoP\)](#) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required.

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which

includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with [British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'](#) and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

Yours faithfully

Victoria Hindmarsh
Planning Advisor

[Redacted signature block]



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Billingshurst
DESCRIPTION:	EIA Scoping Report review
REFERENCE:	EIA/26/0003
RECOMMENDATION:	Advice

SUMMARY OF COMMENTS

The Site is located to the west of Billingshurst and is predominantly agricultural in use. It is enclosed by a network of mature hedgerows with intermittent hedgerow trees, small woodland blocks (notably Pratt's Copse and Eaton Copse adjacent), and tree-lined boundaries. These features are typical of the site's rural setting, and collectively they form an established green infrastructure framework, contributing to landscape character and ecological connectivity within the area.

The Scoping Report refers to woodlands and hedgerows on several occasions, reflecting their presence within the baseline description of the site. Trees are also referred to in the context of boundary features, landscape structure, and proposed green infrastructure. However, there is no substantive reference to veteran trees, nor any dedicated assessment of their potential presence, which is highly likely given the rural context of the site and the high likelihood of over-mature hedgerow oaks within field boundaries.

MAIN COMMENTS

Tree and Hedgerow Resource Observations Highlighted in the Report

The boundary hedgerows identified in the report appear to be mostly composed of mixed native species, with mature standards including oak and field maple evident in parts. These hedgerows are therefore likely to qualify as "important" under the Hedgerow Regulations 1997 in places, subject to survey confirmation.

In this respect, national context is important. Between the 1940s and the 2020s, the UK lost approximately half of its total countryside hedgerows, with an estimated 118,000 miles (roughly 190,000 km) disappearing during this period; mostly due to agricultural intensification and development pressures. Hedgerows are a UK Priority Habitat, forming wildlife corridors, carbon stores, and key landscape features. Retention of intact, species-rich hedgerows should therefore be considered a key element of site design at the early design stages.

The Scoping Report anticipates potential removal of sections of hedgerow and boundary trees to facilitate access points, internal road alignments, and development plateaus.

While some loss may be unavoidable, the extent and justification of any removal would need to be substantiated by an Arboricultural Impact Assessment (AIA) report.

Potential impacts on retained trees have been highlighted in the report, and it advises that tree conflicts could arise from construction incursions, soil level changes (up to $\pm 4\text{m}$), and groundwater management if Root Protection Areas (RPAs) are not respected.

Veteran and Notable Trees Observations Highlighted in the Report

There is no specific reference to veteran or ancient trees within the report, as such. However, given the scale and rural setting of the proposal, as mentioned previously there is a reasonable likelihood of over-mature field boundary oaks or former hedgerow standards exhibiting veteran characteristics. Such trees would represent high ecological and amenity value and would be defined as irreplaceable habitats within the NPPF (2024).

Therefore, early identification of these trees would be necessary, and appropriate buffering would be a requirement of any forthcoming application. Development within veteran tree buffers or beneath crown spreads could not be supported, and such areas would require additional protection measures during the build-out and post-development stages.

Woodland Observations Highlighted in the Report

Adjacent woodland blocks (Pratt's Copse and Eaton Copse) contribute significantly to landscape and ecological value. Although these appear to be located outside the main Built Development Areas, indirect impacts such as edge effects, lighting, hydrological changes, and recreational pressure may arise.

The proposed additional woodland planning and a country park are positive in principle; however, new planting cannot substitute for established woodland or mature tree cover. Where these features are present, they should be retained, reinforced, and appropriate Ancient Woodland (AW) buffers would be required.

Arboricultural Considerations for Any Forthcoming Application

Subject to further assessment, the development appears capable of accommodating existing trees and woodland while respecting key features, provided design and mitigation measures are considered early.

Key considerations include:

- Identification and protection of RPAs for retained trees and hedgerows.
- Avoiding built development or infrastructure within RPAs wherever practicable or treating such interventions as exceptional and well justified.
- Maintaining adequate spacing between retained trees and new buildings to allow for growth and ongoing management.
- Considering soil conditions typical of the Low Weald (clay soils), which may be susceptible to post-development shrink-swell, to manage potential subsidence risks near retained trees.

Early arboricultural input will help inform layout, foundation design, and planting strategies, supporting long-term compatibility between retained trees, hedgerows, and the proposed development.

Overall Impact and Importance of Retention

The existing hedgerows, mature trees, likely veteran specimens, and woodlands make a strong contribution to the Site's character, biodiversity, and ecological connectivity. Their retention should be a key consideration in any future application and their successful retention and integration within the scheme, should be informed at the design stage rather than treated as an afterthought.

A full AIA, detailed tree survey, and assessment of veteran trees would be required to support the application.

NAME:	Andy Bush Arboricultural officer (Planning)
DEPARTMENT:	STRATEGIC PLANNING - SPECIALISTS
DATE:	26/02/26



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO: Matthew Porter	Horsham District Council – Planning Dept
LOCATION:	Land West of Billingshurst, West Sussex
DESCRIPTION:	EIA Scoping Opinion
REFERENCE:	EIA/26/0003
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: The application area is well over the 0.5ha area that would require the results of a search of the West Sussex Historic Environment Record to be provided. An Environmental Scoping Report is provided that identifies that there is potential for as yet unknown archaeological remains to be present and so further assessment work is required to inform the Environmental Impact Assessment. This work should take the form of an initial desk based archaeological assessment informed by a comprehensive geophysical survey of the site.	

MAIN COMMENTS:

The application area is well over the 0.5ha area that would require the results of a search of the West Sussex Historic Environment Record to be provided. The Environmental Impact Assessment Scoping Report produced by Turley includes a figure showing the results of the HER search and includes a short section on Archaeology that notes that there are no designated archaeological assets on the site, the site is not within an Archaeological Notification Area and has a generally uncertain potential, although previous work in the area, particularly in the south east of the site during construction of the Billingham Bypass suggests that there is an elevated potential for prehistoric archaeology and so there is some potential for as yet unknown archaeological remains to be present.

Due to the potential for archaeology to be present then further work will be required to inform the EIA. This should take the form of a comprehensive desk-based assessment of the site which should be informed by a geophysical survey of the development area. This would best take the form of a magnetometry survey supplemented by a multispectral drone survey to give an initial indication of whether archaeological features are present. If potentially significant features are revealed, then some targeted trial trenching prior to determination of the application may also be required.

This work will enable an informed decision to be made on the nature, extent and significance of the archaeological resource and inform any mitigation measures which may be required

ANY RECOMMENDED CONDITIONS:

NAME:	Nick Truckle BA MCIFA
DEPARTMENT:	Surrey County Council Historic Environment Planning
DATE:	23/2/2026

From: Matthew.Porter
Sent: 03 March 2026 16:05
To: Matthew.Porter
Subject: FW: EIA/26/0003 Land West of Billingshurst

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

From: Sean.Rix <[redacted]>
Sent: 23 February 2026 10:53
To: Matthew.Porter <[redacted]>
Subject: EIA/26/0003 Land West of Billingshurst

Hello Matthew,

I have nothing more to add to the response given by Historic England.

Regards,
Seán

Seán Rix
Senior Conservation 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



Matthew Porter
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Our ref: 14217
Date: 24 February 2026

By email only: Planning Department, planning@horsham.gov.uk

Thank you for requesting advice on this EIA scoping opinion from Place Services' ecological advice service. This service provides advice to planning officers to inform Horsham District Council planning decisions with regard to potential ecological impacts from development.

Application: EIA/26/0003
Location: Land West of Billingshurst West Sussex
Proposal: EIA Scoping Opinion

Thank you for consulting Place Services on the above EIA Scoping Opinion.

Summary

We have reviewed the following submitted information:

- Environmental Impact Assessment Scoping Report (ISEP, January 2026)
- Appendix 9.1 Ecological Impact Assessment (EclA) – Receptors Scoped Out of ES Only (Tetra Tech, January 2026)
- Appendix 9.1D: Habitat Assessment (Tetra Tech, January 2026)
- Appendix 9.1E: Roosting Bat Report
- Appendix 9.1F: Hazel Dormouse Report (Tetra Tech, January 2026)
- Appendix 9.1H: Reptile Report (Tetra Tech, January 2026)
- Appendix 9.1I: Ecology Survey Data Validity (Tetra Tech, June 2025)

The Environmental Impact Assessment Scoping Report (ISEP, January 2026) details the proposals for this site which is for a hybrid planning permission for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure. The site covers approximately 106.29ha. The site is located to the west of Billinghamurst.

Baseline Information:

The desktop assessment has been prepared in consultation with the Sussex Biodiversity Record Centre (SxBRC) – accessed under licence and these records inform the survey requirements. Protected and Priority species have been considered adequately. Records from new or updated surveys undertaken should be shared with the local record centre.

We support the preparation of the desktop study using biological data from new or updated surveys undertaken should be shared with SxBRC and other relevant local record centres. We highlight the need to refer to Priority habitats and species in order for the LPA to demonstrate compliance with its biodiversity duty under s40 of the NERC Act (as amended) and the strengthened duty to conserve and enhance biodiversity.

Potential Impacts:

This proposed project does not directly impact on statutory designated sites. However, the site lies approximately 6.5km west of The Mens Special Area of Conservation (SAC) ([MAGIC maps](#)) is therefore within the 6.5km Key Conservation Area for this SAC, within which all impacts must be assessed as the habitats within this zone are considered critical for sustaining the populations of Barbastelle bats within the SAC, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 6.6km west of Ebernoe Common Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for this SAC, the desk study returned one record for Bechstein's bat located within 2 kilometres of the site. The bat activity surveys (static) did return Barbastelles utilising the site in low numbers. No European Protected Species Mitigation Licences (EPSML) have been granted within 2km of the site ([MAGIC maps](#)) which included Barbastelle. There is one granted licence from 2016 which included Common Pipistrelle, Soprano Pipistrelle and Whiskered Bat. There are approximately 47 records of bats within 2km of the site, including Serotine, Noctule and Brown Long-eared Bat (SxBRC – accessed under licence). The site lies approximately 7.7km north of Arun Valley SAC, SPA and Ramsar site.

Bat activity surveys (transect and static detector) were last conducted in 2023, as was the advanced survey technique bat trapping. The submitted information states the applicant is aiming to submit an application for this site Autumn 2026, additionally it is stated that the Shadow Habitats Regulations Assessment (sHRA) is currently being produced. Given the scale of the proposals, age of the survey data and location of the site in relation to Habitat sites, within key conservation areas, updated, supplementary activity surveys are considered advisable to inform the sHRA and impacts upon qualifying species (Barbastelle and Bechstein bat). Significant impacts or severance to flightlines must be considered (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement

Protocol) and details of avoidance, mitigation and compensation measures provided. This information will be required to inform the LPA's project level HRA.

The results of the Preliminary Roost Assessment, emergence surveys and Ground Level Tree Assessment are in date and would be sufficient to support an Autumn 2026 application. However, we note the submitted Appendix 9.1E: Roosting Bat Report does not clearly indicate why only some of the PRF-M trees were subject to further surveys so all trees likely to be affected need assessment and this information will be required to inform the LPA's project level HRA..

A non-statutory designated site: Local Wildlife Site (LWS) C89/ H46: Wey & Arun Canal, River Arun & adjacent meadows is located west of the site boundary. There are also parcels of ancient woodland (irreplaceable habitat) bordering the site so Government Standing Advice needs to be followed.

The submitted Environmental Impact Assessment Scoping Report (ISEP, January 2026) states site-specific surveys have been undertaken, and it is currently under consideration whether further updates are required to support an application. Below is a summary of approximate surveys and when they were conducted from the information provided:

- Hedgerow Regulations Survey – conducted in 2023, the results of these surveys are still considered valid.
- UK Habitat Survey – conducted May 2025, the results of these surveys are still considered valid.
- Bat activity static and transect – conducted 2023, see comments above. Supplementary updated surveys are advisable.
- Advance survey techniques, bat trapping – conducted 2023, updated surveys are not considered necessary.
- Bat surveys (emergence, PRA and GLTA) – updated conducted 2025, see comments above.
- Dormouse surveys – Conducted 2023, only three potential nests were returned from those surveys. Section 3.5.7 of the Hazel Dormouse Mitigation Handbook (Wells, D *et al*, 2025) regarding repeat surveys, states these should be carried out if any of the following apply
 - Five years have elapsed since the previous surveys;
 - There has been significant change in the management of dormouse habitat in the surrounding area which might have caused Dormice to move into the site;
 - There are new records in the area;
 - There has been significant change in the habitat quality on the site.

The applicant should use the above to determine whether supplementary updated surveys, in line with the latest survey techniques, which could include footprint tunnels, will be required.

- Breeding bird surveys – Conducted 2023, given the scale of the site and the large scale loss of agricultural land, updated supplementary surveys are considered advisable particularly for Priority farmland birds.
- Winter Bird Surveys – currently being undertaken. These will be in date and valid for a 2026 application.
- Badger – results relating to Badger activity are considered valid for 12 months only. Any Badger report needs to be marked confidential or text in the ES will need to be redacted.
- Reptiles – Conducted 2023, the surveys identified Grass Snake and there was an incidental, lost record for Common Lizard. The applicant should provide sufficient justification as to why updated surveys are not considered necessary and an outline mitigation and compensation strategy should be provided.

Reasonable mitigation measures will need to be identified for the construction process which will then need to be secured by a condition of consent.

The submitted ecological report will need to consider the potential impacts on all the relevant protected and Priority species and effectively avoided impacts. We have only been provided with a summary of this report. This is necessary for the Local Planning authority to demonstrate they have met their strengthened s40 biodiversity duty. Survey and assessment should meet the requirements of Natural England Standing Advice.

Methodology:

We are satisfied that nationally agreed guidelines have been followed for the ecology surveys and all survey work has been undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species should meet the requirements of Natural England Standing Advice.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

Any report on Badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.

Opportunities:

To comply with NPPF, there is an opportunity to enhance the corridor, to deliver net gain for biodiversity. The EIA should thoroughly explore all reasonable options to enhance the development for protected and Priority species and meet the requirements of mandatory biodiversity net gain. Please note that comments on Biodiversity Net Gain are provided by Horsham District Council in-house.

Conclusion:

We agree that Biodiversity can be scoped out for further assessment within the Environmental Report.

In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on protected and Priority species and habitats at submission either in a non EIA chapter or separate documentation. This is necessary in order that the LPA has certainty of all likely impacts, not just significant ones, from the development and can issue a lawful decision with any mitigation and compensation measures needed to make the development acceptable, secured by condition.

Please contact us if you have any queries in relation to this advice.

Hayley Dean MCIEEM MSc BSc (Hons)

Senior Ecological Consultant

Place Services at Essex County Council



Place Services provide ecological advice on behalf of Horsham District Council.

Please note:

This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

We are unable to respond directly to applicants/agents or other interested parties. Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Billingshurst West Sussex
DESCRIPTION:	EIA Scoping Opinion
REFERENCE:	EIA/26/0003
RECOMMENDATION:	Advice /_No Objection / Objection / <u>More Information</u> / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION:	
MAIN COMMENTS:	
<p>Enterprising Horsham will wish to understand more about the relationship of the proposed new development to the economy of the town centre in terms of access by its additional residents and the associated local retail/services that could be built in.</p> <p><i>"Please note these comments are provided on a without prejudice basis to development management's wider consideration of all relevant planning policy and material planning considerations. These comments are not a formal indication that planning permission will be forthcoming and the advice does not bind Horsham District Council to a final recommendation on any planning application."</i></p>	
ANY RECOMMENDED CONDITIONS:	
NAME:	Julie Cavallo
DEPARTMENT:	Enterprise (Economic Development)
DATE:	09.02.26



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	EIA/26/0003
LOCATION:	Land West of Billingshurst, West Sussex
DESCRIPTION:	EIA Scoping Opinion
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: "Newbridge Park, Land West of Billingshurst Environmental Impact Assessment (EIA) Scoping Report" submitted by Turley, dated January 2026 "Air quality and odour monitoring and assessment receptor locations" Map prepared by NALO Group, dated January 2026	

Main Comments:

Environmental Health has reviewed the above documents for the EIA scoping application, and I have the following comments about the Air Quality assessment of the site.

I am pleased to see that the applicant is planning to include a CEMP in the ES. From an air quality perspective, it is important that the CEMP includes dust and emissions controls as well as monitoring, reporting and compliance.

Horsham District Council requires that all major developments need an Air Quality Assessment (AQA) regardless of the anticipated Air Quality impact. The AQA should be included in the EIA and should cover:

- Description of the development & planning context
- Baseline air quality review
- Construction phase assessment
- Traffic impact assessment
- Identification of sensitive receptors
- Dispersion modelling
- Damage cost calculations
- Mitigation strategy

Please refer to the DEFRA Air quality appraisal: damage cost guidance, the Sussex Air guidance and IAQM guidance for help with this.

Additionally, all developments that require an AQA, need to provide evidence that they have minimised PM_{2.5} emissions, and provided appropriate mitigation, in line with the DEFRA PM_{2.5} Interim Guidance.

The scoping report mentions no meteorology in the modelling and relies only on worst-case DMRB screening. This is inadequate for a development of this size and location and should be upgraded to full dispersion modelling in the ES.

The applicant needs to justify the odour assessment in relation to the IAQM guidance. The chosen significance threshold of 3.0 ouE/m³ is lenient for new residential development and should be reconsidered. Particularly in the area adjacent to Billingshurst recycling centre. As receptor sensitivity is likely to be high in the area close to the recycling centre, a maximum Odour Exposure Level of 1.5 ouE/m³ is likely to be more applicable.

NAME:	Georgina Hermitage
DEPARTMENT:	Environmental Health and Licensing
DATE:	20/02/2026



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE	EIA/26/0003
LOCATION:	Land West of Billingshurst, West Sussex
DESCRIPTION:	EIA Scoping Opinion
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Newbridge Park, Land West of Billingshurst Environmental Impact Assessment (EIA) Scoping Report" submitted by Turley, dated January 2026 Ground Condition Consultants Ltd Ground Condition Desk Top Study, dated March 2025 (Appendix 5.2 to above document) Baseline Daytime Noise Modelling from Extrium dated 19 January 2026 Baseline Nighttime Noise Modelling from Extrium dated 19 January 2026 Proposed Noise Monitoring Locations dated 19 January 2026	

MAIN COMMENTS:

Land Contamination

Environmental Health have reviewed the Ground Condition Consultants Ltd Ground Condition Desk Top Study, dated March 2025, and we have the following comments to make.

1. We are satisfied with the preliminary assessment of the risk from contamination to future site users, as presented in the above-mentioned report.
2. We acknowledge that the site is primarily undeveloped land but there is still a need to consider ground conditions on the site. We therefore agree with conclusions in the report in that in order to fully quantify the risks from contamination to future site users some ground investigation works, including testing of soils, is required on the site.

Noise

We have reviewed Chapter 8 of the EIA titled 'Noise and Vibration' and we have the following comments to make.

1. Certain parts of the proposed development are located in close proximity to the heavily trafficked A272, the Billingshurst Recycling Centre and industrial units at Platts Roundabout, the latter of which has recently been given permission for 24-hour use – noise from these offsite sources are therefore potential constraints to development. With this in mind, we note that whilst there is some commentary in relation to these in sections 8.2 and 8.3 there is no detail on whether they will be scoped in or scoped out.
2. With reference to sections 6.6.2 and 6.6.4 of the Sussex Planning Noise Advice Document, dated November 2023, and Para 187 of the National Planning Policy Framework 2023 the 'agent of change' principle clearly applies in this situation – in our view the above-mentioned noise sources therefore need to be scoped in.
3. We note that section 8.7 provides commentary on the Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Existing Human Receptors. We note the comment 'It is not expected that there will be significant effects of noise from these sources on existing residential properties, even from fixed plant or deliveries at night, as there is a minimum of either the A29, the A272 or a 100m distance between these noise sources and existing residents'. Given the absence of a plan which clearly shows the location of the proposed commercial elements in relation to existing residential we are unable to confirm this.
4. We accept that noise from School, Community Hub, Sports Facilities on existing human receptors can be scoped out. However, given the potential for LMax noise events from the commercial elements we are not currently in a position to support the scoping out of commercial elements on existing human receptors.
5. We note that section 8.8 provides commentary on the Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Future Human Receptors. We note the comment 'Noise from fixed plant or deliveries at night from the commercial elements would not be detectable at the proposed dwellings as there is a minimum of either a 10m internal road or 10m distance between these noise sources and proposed dwellings'. Given the distance quoted (10m) and, with reference to the relevant sections of Sussex Planning Noise Advice Document, the nature of noise associated with the commercial element (typically LMax events) we do not agree that noise from the commercial element on future human receptors will not be significant.
6. We are happy for noise from operational use of the school, community hub and sports facilities on future human receptors to be scoped out, noise from operational use of the commercial elements on future human receptors does however need to be scoped in.

7. We note that sections 8.9 and 8.10 provide commentary on noise and vibration on existing or future sensitive human receptors with both being scoped out. This is a multi-phase development which will be built out in stages, we therefore consider it likely that both existing and future residents will be impacted by noise and vibration associated with construction and unfortunately we not agree with the comment that they are not considered significant – both should be scoped in.
8. We note that detail on the proposed noise background monitoring is detailed in sections 8.12 to 8.20 which is welcomed. Given the proposed commercial elements of the development and existing commercial elements, as detailed above, and with reference to sections of the Sussex Planning Noise Advice Document, the noise assessment should also include an assessment in accordance with BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licencing
DATE:	27/02/26



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Billinghamurst
DESCRIPTION:	Scoping opinion
REFERENCE:	EIA/26/0003
RECOMMENDATION:	Advice
SUMMARY OF COMMENTS & RECOMMENDATION: N/A	
MAIN COMMENTS: The comments below refer to Chapter 10. Landscape and Visual Amenity, of the EIA scoping report (Jan 2026). I provide comments by section as follows: Effects Unlikely/Not Significant: <i>Changes to character and the setting of the national landscape; Changes to views out from the national landscape; Changes to night-time views from the national landscape [South Downs National Park, visual receptors within the national park, including recreational walkers]</i> 1. Please note the locations for the SDNP views 1-4 could not be located within the submitted information. While I am satisfied these views can be scoped out from the EIA, the location of the views should be added to the scoping package for completeness and in the interest of third parties Study area: 2. The scope within 1km from the site boundary is agreed with provided the study area remains as indicated in DWG no PA01, which include viewpoint 27. Assessment of visual effects: 3. With regards para 10.41, please note Type 3 visualisations are considered proportionate for this type of project and will be expected for most of the agreed viewpoints. We are happy however to agree these through further consultation as suggested. Assessment scenarios: 4. Please consider as part of the mitigation strategy if there are opportunities to deliver early planting buffer zones (alongside site set up), where enhancement of existing boundaries is required and these areas are protected from construction	

due to RPA protection for example. This could be favourable to reduce some of the adverse effects identified at Year 1.

Detailed Methodology – Appendix

5. The methodology correctly identifies that the effects can be positive, adverse or neutral however table A-11 provides definitions for what you'd appear to be major, moderate and minor adverse effects. It is suggested that these are refined and/or additional definitions added for what is considered to be positive effects.

ANY RECOMMENDED CONDITIONS: N/A

NAME:

Inês Watson CMLI
Specialist Team Leader (Landscape Architect)

DEPARTMENT:

Specialists Team - Strategic Planning

DATE:

24/02/2026



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Billingshurst
DESCRIPTION:	EIA Scoping Report
REFERENCE:	EIA/26/0003
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
MAIN COMMENTS: Proposed Development: A residential-led development for up to 1,100 dwellings, a 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure on land west of Billingshurst. Policy Comments: The specialists within the strategic planning team should be consulted in respect of landscape, heritage, trees and biodiversity (and/or DM's ecological consultant). The following comments take into account most matters will be addressed by other consultees. There are however a couple of matters that the policy team consider cannot be scoped out at this stage: strategic allocation HA4 in the emerging Local Plan in respect of cumulative impacts, and The Mens SAC for reasons explained below: <u>Cumulative Project Plan:</u> it is considered this should include and take into account all permitted and allocated sites including those in the emerging Local Plan. The emerging Local Plan is at Examination stage which includes a strategic site allocation at Land East of Billingshurst which is not showing on the cumulative project plan. The strategic allocation at Land East of Billingshurst is for 650 dwellings (35% of which to be affordable), a permanent Gypsy and Traveller site for 5 pitches, community hub, c.0.5ha employment floorspace, provision for a 2 form entry primary school including provision for special education needs and early year facilities, open space and new station car park. It is considered too early to scope out the allocations in the emerging Local Plan. This would also feed into any in combination effects. Subject to comments from WSCC, this may have to include regard to the provision of a new secondary school within Billingshurst in light of the current capacity and the impacts from the cumulative housing numbers. <u>Designated Nature Conservation Sites:</u> It is important that full consideration to designated nature conservation sites is given. It is therefore important that The Mens SAC is scoped in given the findings of the emerging	

Local Plan's HRA and Air Quality Addendum. By way of reasoning and likely issues these include not just Bats but also potential effects of nitrogen deposition from combustion engine motor traffic whereby if the Transport Assessment concludes the number of HGVs using the A272 at the Mens SAC will increase to or above 200 HGVs per day then measures will be necessary to reduce this to less than 200 or ensure Euro6 standard compliance; ammonia given that the emerging Local Plan's HRA identified an issue with ammonia at The Mens SAC resulting in the strategic allocation at Land East of Billingshurst being required to provide electric vehicle charging points for all car parking spaces. It is recommended regard be given to the requirements of the HRA in respect of the emerging Local Plan's strategic allocation of Land East of Billingshurst and the resultant policy HA4 requirements. It should be noted that these are considered soft measures and if not implemented then a charge on developers may be required for hard measures to be put in place, and monitoring of vehicles undertaken along the A29 past The Mens SAC.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Rebecca Fry (Signed off: MB)
DEPARTMENT:	Strategic Planning – Planning Policy
DATE:	23/02/2026



LONDON OFFICE

Mr Matthew Porter
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Our ref: PL00801175

Your ref: EIA/26/0003

16th February 2026

Dear Mr Porter

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION
(Regulation 15 of the Town and Country Planning (Environmental Impact
Assessment) Regulations 2017)**

Re: EIA/26/0003 - LAND WEST OF BILLINGSHURST WEST SUSSEX

Thank you for your letter of 5th February 2026 consulting us about the above EIA Scoping Opinion.

This development has the potential to affect several designated heritage assets in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we expect the Environmental Statement to include a thorough assessment of the likely effects on those elements that contribute to the significance of these heritage assets.

While there are no listed buildings or scheduled ancient monuments within the site boundary, the site forms part of the wider setting of a number of designated heritage assets. The main potential impacts therefore relate to changes to the significance of these assets arising from alterations to their settings. Accordingly, we welcome the inclusion of archaeology and built heritage within the proposed EIA scope.

Heritage assets within 1 km of the site have been identified. The principal designated assets that may be affected are those along the A272 and Lordings Road, to the south-west of the site, all of which are grade II listed:

- Hole Cottage (LEN 1027101)
- Lime Burners Arms Public House (LEN 1356651)
- Diggles (LEN 1354125)
- Newbridge Cottage (LEN 1192793)



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- Newbridge Farmhouse (LEN 1027102)
- Wynstrode Farmhouse (LEN 1286440).

With reference to the proximate Billingshurst Conservation Area, the scoping report concludes that this would not be affected by the development due to intervening built form, topography and planting, which prevent intervisibility and limit any contribution from the site to its character or appearance. On this basis, no impact assessment is proposed.

However, the Billingshurst Conservation Area Appraisal (January 2018) identifies a landscape fringe to the north-west of the conservation area boundary - part of which lies within the south-eastern boundary of the site – as having medium sensitivity to change. This area includes peripheral vegetation associated with the grade II listed Manor House (LEN 1380083), as well as allotments and open green space containing some intact landscape features west of the bypass. These spaces help maintain the rural character of the historic village core and preserve visual links to the surrounding countryside, thereby contributing to the conservation area's setting.

The Appraisal also identifies glimpsed views of the grade I listed St Mary's Parish Church (LEN 1354139), particularly its spire, from this fringe. Notably, vantage point 'a' on the public footpath at the north-west edge of Billingshurst provides important combined views of the Church spire and the Manor House.

On this basis, we disagree with the conclusions of the scoping report and consider that the impact assessment should include an evaluation of the development's effects on the Billingshurst Conservation Area through potential changes to its setting.

We support the proposed baseline methodology, including preparation of a Heritage Assessment to accompany the Environmental Statement, which should provide a thorough evaluation of the heritage significance and setting of all assets within the study area that may be affected by the development.

The Environmental Statement should also consider potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, as these may also be of national importance and contribute to the local character and distinctiveness of an area and its sense of place.

It is essential that the assessment ensures all impacts are fully understood. Sectional drawings and photomontages can be particularly valuable in this regard.

The assessment should also address the effects of associated activities - such as construction, servicing, maintenance and traffic - on the perception, understanding and appreciation of heritage assets. Where relevant, it should also consider any



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changes to drainage patterns that could lead to decomposition or destruction of archaeological deposits or cause subsidence of buildings or monuments.

We strongly recommend early engagement with your Conservation and Archaeological Officers. They are best placed to advise on local historic environment issues and priorities; opportunities to avoid or minimise impacts; appropriate mitigation measures; and potential wider benefits for the future conservation and management of heritage assets.

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

Yours sincerely

Luciana Gallo

Luciana Gallo RIBA PhD FSA
Assistant Inspector of Historic Buildings and Areas
London and South East Regions Group



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Date: 12 February 2026
Our ref: 540808
Your ref: EIA/26/0003



Horsham District Council
planning@horsham.gov.uk
BY EMAIL ONLY

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

Dear Sir/Madam

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): EIA scoping opinion 1110 dwellings
Location: Land West of Billingshurst West Sussex

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 05 February 2026, received on 05 February 2026.

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

James Ward-Gwilliam
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

International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- The Mens Special Area of Conservation
- Arun Valley Special Protection Area/Special Area of Conservation/Ramsar Water Supply

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>

The ES should thoroughly assess the potential for the proposal to affect nationally and internationally designated sites of nature conservation importance, including marine sites where relevant. European sites (Special Areas of Conservation (SAC) and Special Protection Areas (SPA) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').

In addition paragraph 187 of the National Planning Policy Framework (NPPF) requires that potential SPAs, possible SAC, listed or proposed Ramsar sites, and any site identified or required as compensatory measures for adverse effects on habitat (European) sites, potential SPAs, possible SACs and listed or proposed Ramsar sites have the same protection as classified sites (NB. sites falling within the scope of regulation 8 of the Conservation of Habitats and Species Regulations 2017 are defined as 'habitats sites' in the NPPF).

Under Regulation 63 of the Habitats Regulations, an appropriate assessment must be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. 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 qualifying features of the site, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a designated site, for example by being linked hydrologically or geomorphologically.

An appropriate assessment should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other.

Further guidance is set out in Planning Practice Guidance on appropriate assessment

<https://www.gov.uk/guidance/appropriate-assessment>

Water Quality/Nutrient Neutrality Advice

This proposal falls within the Impact Risk Zone of European Sites vulnerable to nutrient impacts. Please refer to Natural England's overarching advice dated 16th March 2022 and sent to all relevant Local Planning Authorities. Proposals with the potential to affect water quality resulting in nutrient impacts on European Sites require a Habitats Regulations Assessment, which should be informed by the Nutrient Neutrality Methodology (provided within our overarching advice letter). For large scale developments, Natural England may provide advice on a cost recovery basis through our **Discretionary advice service**.

All queries in relation to the application of this methodology to specific applications or development of strategic solutions will be treated as pre-application advice and therefore subject to chargeable services.

Nationally designated sites

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

- The Mens
- Upper Arun
- Coppedhall Hanger

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 Geportal](#).

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, badgers 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 NOx 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

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

provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.

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.

Consultee Response

Case Ref: EIA/26/0003	Date: 24 February 2026
From: NatureSpace	Response: Advice given

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

Summary

- The development falls within the amber 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 amber impact zone, there is suitable habitat and a high likelihood of great crested newt presence.
- There are at least 19 ponds within 500m of the development proposal, 4 of which are located onsite.
- There are historical and recent great crested newt records onsite and within 50m of the development site
- There is direct connectivity between the development and surrounding features in the landscape.

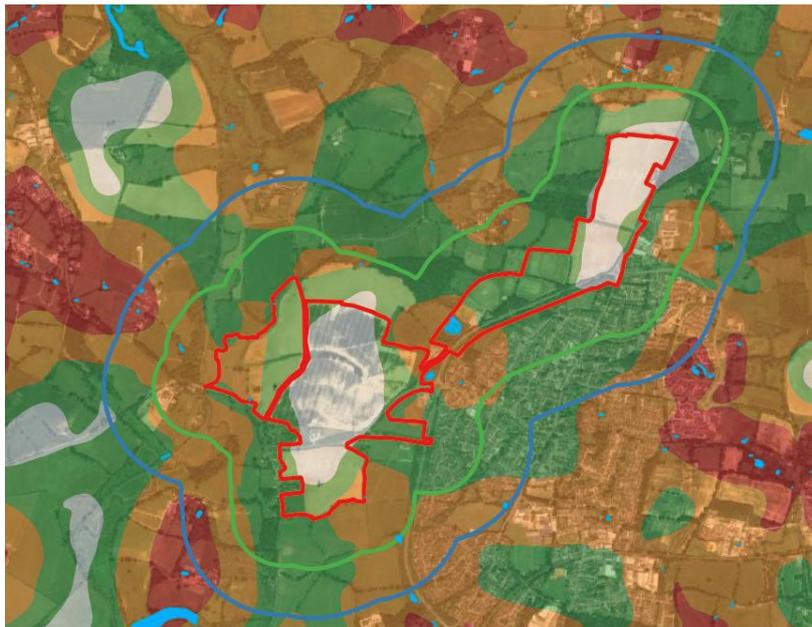


Figure above: Outline of the site (red) in the context of the surrounding landscape, including the Impact Risk Zones for GCN. Ponds are shown in light blue. A 250m buffer is shown around the site in green and a 500m buffer in blue. Contains public sector information licensed under the Open Government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

Ecological Information

The applicant has provided some reports:

- Appendix 9.1G: Great Crested Newts, Billingshurst, Tetra Tech, January 2026; and
- Environmental Impact Assessment (EIA) Scoping Report, Newbridge Park, Land West of Billingshurst, Turley, January 2026

Within these reports it states that:

- *"From the 16 waterbodies, 10 were not suitable for eDNA surveying due to either being dry (WB2) or being inaccessible to survey teams (WB1, WB3, WB4, WB5, WB6, WB7, WB12 and WB13), as well as WB16 not being within the RLB at the time. Environmental DNA (eDNA) surveys were therefore undertaken on the six remaining accessible waterbodies on 29th June 2022 (WB8, WB9, WB10, WB11, WB14 and WB15)."*
- *"Two waterbodies (WB8 and WB15) returned a positive eDNA result, as both waterbody samples had one out of a series of twelve qPCR replicates returning a positive result."*
- *"Though two positive eDNA results were found from waterbodies on site, GCN were not recorded in the first four visits of population assessments, and the ditches became too dry to continue the surveys. As such, it is assumed that if GCN are present on site, the population is small in size, or transient in nature. Proposed development plans seek to retain all waterbodies on site, and buffer marginal vegetation which may be utilised as terrestrial habitat. Therefore there will be no loss of GCN habitat, and this will not be considered further in the EIA, or reported in the ES"*

Conclusion and recommendations

Whilst we have no comments at this stage with regard to the EIA scoping application, it is recommended that further information is submitted alongside future applications in relation to GCN. The above report has undertaken presence/absence in 2023 (negative) and eDNA surveys in 2022 which demonstrated evidence of GCN presence on site. It is likely that either a licence or updated/further surveys will be required for this site. Should the applicant wish to avoid undertaking further surveys, they also have the option of enquiring in to Horsham District Council's District Licence, which provides full legal cover for any impacts to great crested newts and therefore removes the risk of having to stop works if great crested newts are found on site. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com.

Please note that 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, December 2024, section 15, 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”*.

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

Our Ref: SDNP/26/00580/ADJAUT
Contact Officer: SDNPA Planning Technical Support
Tel. No.: 01730 819361

11 February 2026

Dear Sir/Madam

Applicant: Horsham District Council
Proposal: Adjoining Authority Consultation Request - EIA/26/0003 - Request for a Scoping Opinion for hybrid planning permission (the Application) for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure (the Proposed Development).

Location: Land West of Billingshurst , West Sussex

Acknowledge request for comments - Adjoining Authority Consultation

I acknowledge receipt of your recent consultation received on 5 February 2026. I shall respond with comments in due course.

Yours faithfully

Planning Support Team
SDNPA (Called In Applications)
Planning@southdowns.gov.uk
For and on behalf of South Downs National Park Authority



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

Your ref
EIA/26/0003

Our ref
DSA000051146

Date
11th February 2026

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: EIA Scoping Opinion.
Site: Land West of Billingshurst, West Sussex.

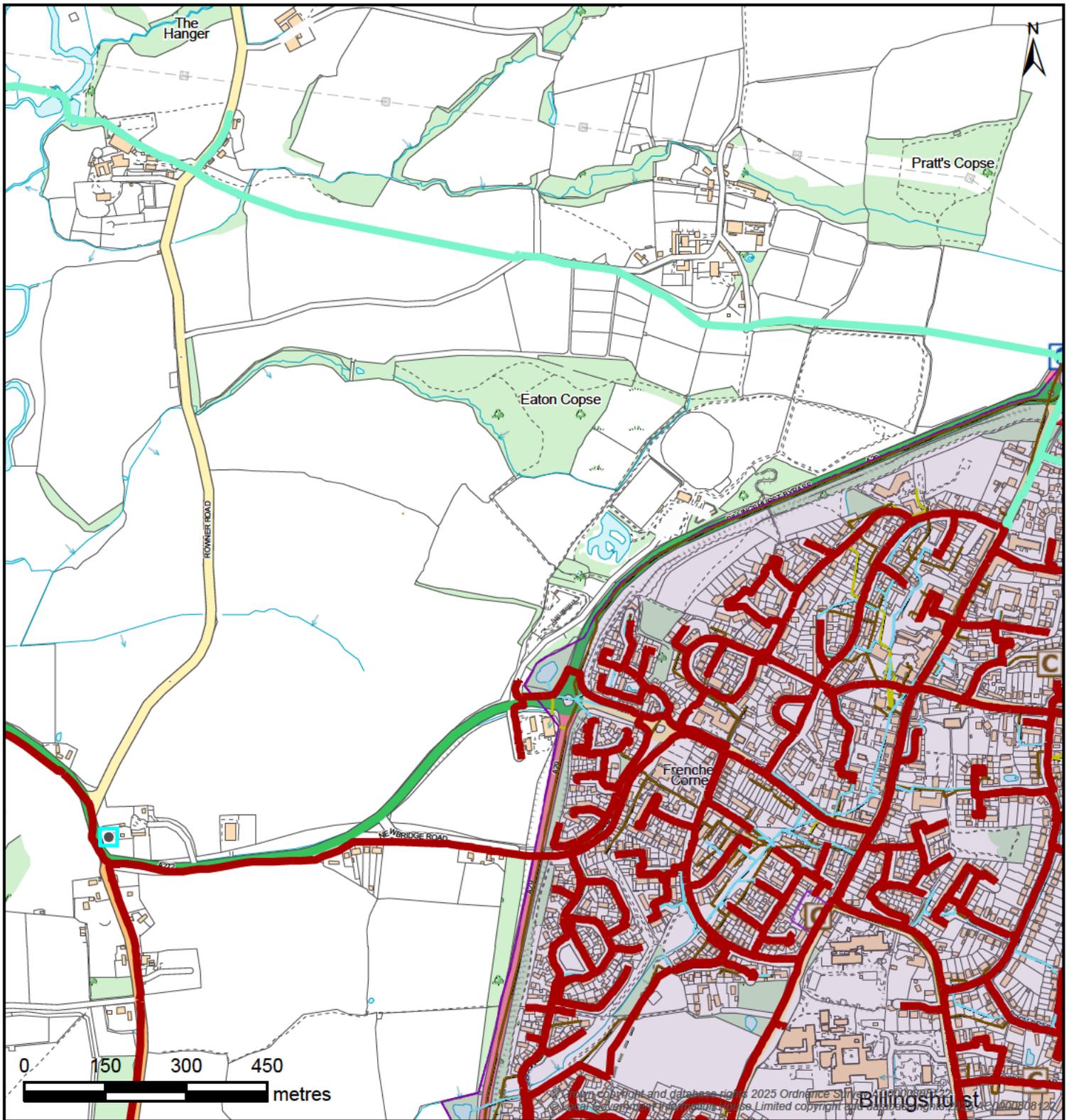
Thank you for your correspondence. Please see our comments below regarding the above planning consultation application.

Southern Water has no objections in principle to this proposal, but we cannot provide any additional comments until full drainage proposals & project details have been submitted for review.

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	
Dombards	Penstock	Valve	Anti Flood Device	Pumped Anti Flood Device	Reflux Valve
Manhole					
BIF Bifurcation	Cascade	CP Catchpit	Heed Of Public Sewer	IC Interceptor Chamber	Manhole
S Soakaway	WO Washout				
Outfall Headworks		Overflow Chamber		Pipe Bridge	
Outfall Headworks	CSO Combined Sewer Overflow	EMO Emergency Overflow	Pipe Bridge	Micro Pumping Station	Pumping Station
Sewer Level Monitor		Storage		Treatment Works	
Sewer Level Monitor	Storm Tank	Tidal Storage Tank	Treatment Works	Weir	Wastewater Site
Wastewater Pipe		Wastewater Use		Developer Services	
Culverted Water Course	Syphon	Foul	Build Over Agreement	Section 104	
Drain	Tank Sewer	Combined	Wastewater Area		
Outfall	Trunk Sewer	Sludge	Catchment		
Overflow	Vacuum Main	Treated Effluent	Sub-Catchment		
Rising Main	Decommissioned Pipe	Surface Water			
Sewer		Private			

Map Title: SW Print

Printed By: Anne.McFarlane2
 Date Printed: 11/02/2026
 Map Scale: 10000

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.



From: Matthew.Porter
Sent: 03 March 2026 16:12
To: Matthew.Porter
Subject: FW: EIA/26/0003 Land West of Billingshurst, West Sussex RH14 9NJ

Matthew Porter

Principal Planning Officer

Telephone: 01403 215561

Email: Matthew.Porter@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

Horsham District Council will only accept service of documents by email if they are sent to legal@horsham.gov.uk. Any documents sent to individual email addresses will not be accepted under any circumstances.

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: [REDACTED] **On Behalf Of** [REDACTED]
Sent: 11 February 2026 15:20
To: Matthew.Porter [REDACTED]
Subject: EIA/26/0003 Land West of Billingshurst, West Sussex RH14 9NJ

Thank you for consulting Sport England.

Sport England considers that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. Consequently, we do not wish to comment on the Screening or Scoping Opinion consultation.

However, any subsequent planning application should consider the implications for sport in the context of NPPF Paragraph 104, local plan policy, and any strategic evidence set out in local playing pitch and/or built facilities strategies.

Sport England should be consulted on the planning application if it meets the statutory requirements contained within SI 2015/295 (development affecting playing fields) or the guidance for non-statutory consultation with Sport England contained within Planning Practice Guidance: Open Space, Sports and Recreation Facilities (Paragraph: 003, Reference ID: 37-003-20140306).

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

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

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

Yours sincerely,

Planning Technical Team

E: planning.south@sportengland.org



Join the conversation #thisgirlcan



From: Melbourne, Lee [REDACTED]
Sent: 05 February 2026 16:43
To: Matthew.Porter [REDACTED]
Subject: Planning Application Consultation - EIA/26/0003

Good afternoon Matthew,
With regards to the above planning application - please be advised that I have no comments to make from a crime prevention perspective.

Kind regards

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

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WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC Highways - Public Rights of Way
DATE:	2 March 2026
LOCATION:	Land West of Billingshurst, West Sussex
SUBJECT:	EIA/26/0003 EIA Scoping Opinion.
DATE OF SITE VISIT:	n/a
RELEVANT PUBLIC RIGHTS OF WAY NUMBER(S):	Footpaths 1331, 1335, 1327, 1326, 1311, 1312 Permissive path P42
RECOMMENDATION:	Advice
S106 CONTRIBUTION TOTAL:	n/a

Thank you for the opportunity to comment on the above numbered planning application. This proposal has been considered by means of a desktop study, using the information and plans submitted with this application, in conjunction with other available WSCC map information. In respect to the above planning application I would provide the following comments.

As stated in the NPPF, para 104, Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Defra Rights of Way Circular (1/09) states The effect that a proposed development will have on Public Rights of Way is a material consideration for planning authorities when deciding whether or not to approve a planning application. The potential consequences on Public Rights of Way must be taken into account. Information supplied by an applicant should therefore explain how the potential development will impinge on Public Rights of Way.

This site impacts upon numerous Public Rights of Way (PRoW) including Footpaths (FP) 1331, 1335, 1327, 1326, 1311, 1312, also Permissive path P42 and Bridleway (BW) 3668 crosses the A29 from site into Billingshurst.

The site will have significant impacts on these both during construction and upon site occupation and measures must be considered as to how these will be mitigated for.

General Notes:

The granting of any eventual planning permission does not authorise obstruction of, interference to or moving of any Public Right of Way (PROW); this can only be done with the prior consent of West Sussex County Council (WSCC), as highway authority, and possibly also a legal Order process by Horsham District Council as the local planning authority. Further advice can be provided on request.

It is an offence to damage the surface of a PROW without the prior consent of the WSCC PROW Team. The applicant must supply a specification and secure the approval of the WSCC PROW Team before works affecting the PROW begin, even if the surface is to be

improved. Where a PROW surface is damaged and there was no prior consent, the applicant will be liable and required to make good the surface to a standard satisfactory to the WSCC PROW Team.

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Rights of Way information is not definitive.

Donna Trethewey
Planning and Communities Officer
Public Rights of Way
West Sussex County Council

Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH



Lead Local Flood Authority

Date 26th February 2026

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

Dear Matthew,

RE: EIA/26/0003 – Land West of Billingshurst West Sussex

Thank you for your consultation on the above site, received on 05th February 2026. We have reviewed the application as submitted and wish to make the following comments.

As this is an EIA scoping application it is accepted that the majority of the surface water related information will be included within any Flood Risk Assessment/Drainage Strategy provided with any substantive application, therefore the LLFA will provide detailed comments on matters within our scope when the planning application is submitted.

We have reviewed section 12 as of the submitted report insofar as it relates to flood risk and surface water drainage, and have no reason to disagree with the conclusions reached therein.

At this juncture we would highlight the requirements for a sequential approach to site design, particularly as this site is affected by both EA modelled flood zones and areas of modelled surface water flood risk.

For information we as LLFA provide a pre application advice service which may be of assistance, details of which can be found here:

[Flood Risk Management: Pre-application advice - West Sussex County Council](#)

Yours sincerely,

Natalie Biddulph
Flood Risk Management Team
FloodRiskManagement@westsussex.gov.uk



**WSSC CONSULTATION RESPONSE:
County Planning – Minerals & Waste Planning Authority**

TO:	Case Officer: Matthew Porter
DATE:	25/02/2026
LOCATION:	Land West of Billingshurst, West Sussex
SUBJECT:	EIA/26/0003 EIA Scoping opinion.
RECOMMENDATION:	<input checked="" type="checkbox"/> Advice <input type="checkbox"/> Objection <input type="checkbox"/> Modification <input type="checkbox"/> No Objection <input type="checkbox"/> More Information <input type="checkbox"/> Refusal

Thank you for consulting the MWPA on the EIA Scoping Opinion at Newbridge Park (Land West of Billingshurst). The associated development includes the provision of up to 1,100 dwellings, a 2-Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure.

The development area is located within the Brick Clay (Weald Clay) mineral safeguarding area and includes land proximal to the existing Billingshurst Household Waste Recycling Centre. Therefore, the applicant should demonstrate at the application stage that the proposal would meet the requirements of Policies M9 (Safeguarding Minerals) of the WSSC Joint Minerals Local Plan (partial review 2021) and W2 (Safeguarded Waste Infrastructure) of the WSSC Waste Local Plan (2014).

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:

Mineral Safeguarding

The submitted Scoping Report identifies the location of the application site within the mineral safeguarding area for brick clay and concludes that the sterilisation of the underlying mineral resource would not be significant when considered within the context of existing reserves and the abundance of the resource across the county. Whilst the MWPA would agree that the priority of the safeguarded resource is relatively low, the development site occupies a significant area (106.29ha), and the potential quality and quantity of the underlying resource remains unknown at this stage. As a result, the level of weight to attribute the mineral resource when considered within the planning balance remains unclear, albeit this will be for the LPA to determine should an application come forward.

Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 at the application stage and a Mineral Resource Assessment should accompany any formal submission for planning permission, to be informed by the Minerals and Waste Safeguarding [Guidance](#). As necessary, the MRA should inform any environmental statement.



Waste Infrastructure Safeguarding

With regards to safeguarded waste infrastructure; the development should be designed in such a way as to reduce any potential impacts arising from the existing waste operations at the Billingshurst HWRC on future adjacent land uses, as per the agent of change principle, to ensure the waste management infrastructure can continue operations within its permitted capacity/permits. This should be demonstrated through the submission of a Waste Infrastructure Assessment at the application stage, to be informed by the Minerals and Waste Safeguarding [Guidance](#) (see 3.4).

Kind regards,

Edward Anderson

