

Steffan Shageer
WSP
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Our ref: EIA/22/0002
Your ref: 70091497

Date: 25 April 2022

Dear Steffan Shageer,

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

Following your email requesting a formal Scoping Opinion for the proposed development at Land North West of Southwater, please find attached a copy of the Scoping Opinion issued on behalf of Horsham District Council. The opinion incorporates the views of the statutory consultees and other relevant departments within the Council. Comments from the Council's Ecology Consultant and Air Quality Officer will follow separately, and we apologise for the delay in these areas. We aim to return these comments as soon as possible.

The full comments of the following consultees are attached:

- Historic England
- Natural England
- Southern Water
- Environment Agency
- WSCC Public Rights of Way

In addition to consultation responses, we have also received 1 no. comment from a local resident which raises an objection to a planning application on this site, and cites overdevelopment, loss of woodland, lack of infrastructure and flooding as reasons to support the objection. The full comments can be viewed via our website (<https://www.horsham.gov.uk/planning>) using the ref: EIA/22/0002.

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

Yours sincerely

Angela Moore
Senior Planning Officer

Scoping Opinion of Horsham District Council

Chapter 1: Introduction

- No comments

Chapter 2: Description of the Nature and Purpose of the Project

- 2.1.2 – please refer to Policy HA3 as a ‘draft allocation’, and the Regulation 19 plan as the ‘Draft Plan’
- 2.1.3 – the Regulation 19 draft plan holds extremely limited weight in decision making.
- Section 2.2 - whilst it is not designated, reference to Southwater Country Park should be made when describing the site’s wider context. This is a popular and well-used local park and is well connected to the Downs Link. It is likely to be used by future residents of the proposed development.
- Section 2.2 – more emphasis/detail to be provided on recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south) to highlight the changing context/character of the village.
- 2.3.6 – please note that any net gain should be measurable against an established baseline.
- 2.3.10 – building to be demolished are required to be confirmed
- Please make reference to any minerals resource safeguarding areas that the site may be within (refer The WSCC Minerals Local Plan).
- The South Downs National Park Authority (SDNPA) have provided the following comments with regard to the effect of the proposal on this designation:
‘The site is located approximately 12km from the boundary of the National Park at its closest point. Due to the relative distance and intervening land cover, which includes a number of trunk roads and settlements, there would not be any significant effects on the setting of the National Park or the landscape designation. It is therefore the view of the Authority that effects on the National Park and its setting may be scoped out’.

Chapter 3: Approach to EIA

- No comments

Chapter 4: Environmental Factors Scoped Out

- Daylight/sunlight/overshadowing – Table 4.1 states that mainly 2-storey dwellings will be constructed, but to achieve 1200-1500 dwellings (plus associated infrastructure) it is very likely that there will be buildings greater than 2 stories’ (flats, commercial premises, school). As such, please re-consider whether this should be scoped out.
- Human Health – please provide commentary in this section on the increase in traffic fumes and associated impact on air quality/health. In addition, please consider odors or other health related impacts from the commercial premises. It is local knowledge that Anthrax spores have been present in the site in the past – this must be acknowledged, and not scoped out.

- We are of the view that the Environmental Statement should include consideration of arboricultural impact, given the scale of the site and the likely loss of a number of existing trees. Trees are an important environmental factor for many reasons, that should not be scoped out. As such, an Arboricultural Statement including a tree survey should be included to demonstrate how the proposed development mitigates any impact.

Chapter 5: Air Quality

- Comments from the Council's Air Quality Officer will follow.

Chapter 6: Cultural Heritage

HDC Heritage Officer:

- The Built Heritage baseline assessment is acceptable in terms of the initial assessment of the extent of potential impact to the setting of heritage assets within the vicinity.
- The baseline assessment currently has little detail to describe impact on settings, so further work needs to be undertaken to fully assess the impact to the setting of the designated heritage assets.

Archaeology Consultant:

- The submitted documentation accurately portrays the archaeological potential of the site and notes that a large portion of the proposed development lies within an Archaeological Notification Area. This notification area stems from a geophysical survey undertaken in 2011, that identified features of archaeological origin, including enclosures, pits and multiple possible kilns or hearths.
- The documentation notes that a desk-based assessment will be carried out as part of the EIA; the proposed 1km study area from the boundary of the site is appropriate. We would recommend that the proposed scheme of geophysical survey is also carried out in advance of the EIA, combined with the results of the 2011 survey. Carrying out the survey at this stage would help inform the EIA and any future archaeological fieldwork or mitigation on the site.
- We note the identification of historic landscape boundaries and approve of the commitment to preserving them within the development.
- Based on the submitted document the EIA will be compliant with the requirements of paragraph 194 of the National Planning Policy Framework. We agree that the level of harm to archaeological remains is likely to be significant in some areas and warrants inclusion within the EIA.

Historic England (summary):

- Full comments are attached.
- We consider that the effects of the development proposals are mainly related to potential impact on the significance of any relevant designated heritage assets through change of their setting.
- Some of the 26 identified heritage assets have been scoped out from the ES based on distance, intervening landscape, and setting to their significance. In general, we agree with the conclusions of this analysis.
- However, we have concerns that the potential for adverse impact on the setting of Grade II* listed Great House Farmhouse has been discounted. Although paragraph 6.5.6 acknowledges that the setting of this building is likely to be altered, it concludes that with appropriate mitigation the effects can be minimised such that it would not be regarded as significant in EIA terms.

- Nevertheless, one of the reasons for designation of the Farmhouse as Grade II* is the historic interest of the site as derived from its location within a medieval landscape.
- On this basis, we consider that the setting of Great House Farmhouse is of high historical and illustrative significance, any change to it would meaningfully alter the heritage value of the farmhouse itself, resulting in potentially significant effects in EIA terms.
- We are content that the EIA will also consider the potential impacts on non-designated features of historic, architectural and archaeological interest (including the defined Archaeological Notification Area).
- We support the strategy for preserving historic landscape boundaries and for assessing any potential archaeological remains. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan.
- The EIA should include a comprehensive Heritage Assessment devised as a separate document from the Landscape Visual Impact Assessment.

Chapter 7: Ecology

- The full response from Natural England is attached.
- Comments from the Council's Ecology Consultant (Place Services) will follow.
- Under the Conservation of Habitats and Species Regulations 2017 (s.63), as competent authority, it is the duty of Horsham District Council to consider the impact of development on protected species and habitats. The EIA supporting document makes only passing reference to Natural England's requirement for all developments in the Sussex North Water Resource Zone to demonstrate water neutrality (refer to the Natural England Position Statement, September 2021). More detailed consideration of this (and its wider environmental and ecological impacts) should be made in the Environmental Statement within the relevant sections including the water resource section and ecology.

Chapter 8: Landscape and Visual

HDC Landscape Architect

- Overall, I'm satisfied with the content of the chapter although please note the proposed methodology is in overview. A detailed methodology is expected to be included at submission stage.
- 8.2.1 – reference is made to a study area radius of 1km. Whilst generally this is agreed with, I believe the context of fields south of the Down Link also need to be taken into account, particularly as development proposals currently include this area. The 1.5km radius seems more appropriate please.
- 8.2.3 – please add users of the recreation/sports facilities adjacent to the site
- 8.3 Baseline Conditions. Note the southern part of the site, between Courtland wood, Kirsty's Wood and the Grade II * Great House Farm, has been identified in the draft Nature Recovery Network map 2021 as an opportunity area with very high habitat potential. These sites are high priority to target with management advice because of the significant contribution they could make to Nature Recovery but also because of the connectivity they provide between other sites. Ideally as much of this area as possible would become part of the core of the Nature Recovery Network with management to benefit nature.
- 8.4.2 Desk-based assessment. Please also note the following documents:
 - Horsham District Landscape Capacity Assessment May 2021
 - Southwater Landscape Sensitivity & Capacity Study

- 8.4.6 – evaluation of the features and elements of the landscape and their contribution to the landscape character, context and setting, based on these studies

Natural England

- Please refer to the full response (attached).

Chapter 9: Noise and Vibration

- No comments

Chapter 10: Socio-Economic

- No comments

Chapter 11: Traffic and Transport

WSCC Highways

- Whilst WSCC Highways don't have any comments on the ES Scoping, the expectation is that any traffic related information within this will be taken from a Transport Assessment prepared to support the highways and transport elements of the development. WSCC are continuing to advise the applicant's transport consultant on the scope of the Transport Assessment.

WSCC Public Rights of Way (summary):

- It's pleasing to see that all affected PRoW are shown correctly within the EIA and it sets an expectation that these will be retained and improved in their existing, rural character.
- Comments provided relating to suggested improvements to existing routes (full comments are attached).

Chapter 12: Water Resources, Flood Risk and Drainage

- The EIA supporting document makes only passing reference to Natural England's requirement for all developments in the Sussex North Water Resource Zone to demonstrate water neutrality (refer to the Natural England Position Statement, September 2021). More detailed consideration of this (and its wider environmental impacts) should be made in the Environmental Statement within the relevant sections including the water resource section and ecology.

HDC Drainage Engineer

- Having reviewed Chapter 12; Water Resources, Flood Risk & Drainage of the document mentioned above, I have no adverse comments to make regarding the proposed assessment.
- I can confirm that the most update and relevant Policy, Legislation and Guidance has been considered with regards the Water Resources, Flood Risk & Drainage chapter.
- Therefore, if this development comes forward and is incorporated into the 'Local Plan' I foresee no major issues with regards Flood Risk.

Southern Water

- The full response from Southern Water (SW) is attached.

- SW apply a precautionary buffer zone for any development located within 500m of the boundary of a Wastewater Treatment Works. The proposed development is located approximately 230 metres from the Christ's Hospital WWTW. Please contact Southern Water to discuss and agree the Scope of the odour assessment.
- Due to the potential odour nuisance from the nearby WWTW, no sensitive development should be located within the 1.5 OdU odour contour. An Odour Assessment will need to be carried out to a specification that will need to be agreed in advance with SW.

Environment Agency (summary):

- Full comments are attached.
- Overall, we are generally pleased with the scope and the range of topics proposed to be included within the Environmental Statement (ES).
- 12.4.1 – the water resource, drainage and flood risk assessment should be conducted in parallel to a ground conditions and contamination environmental statement chapter.
- 12.6.1 – we support the investigation of the use of SuDS to manage surface water flooding.
- A drainage strategy will be required to show mitigation during construction (12.5.9)
- We would expect foul drainage to connect to a public sewer for a development of this size. We may object to any planning application if non-mains drainage for foul water is proposed.
- The local water company should be liaised with to ensure capacity for both foul water and supply water.
- Ordinary watercourse consent is likely to be required for the erection of any flow control structure, culverting or diversion.

Chapter 13: Ground Conditions and Contamination

HDC Environmental Health

- We are unable to comment fully until we've had sight of the reference desk study reports, we would therefore be grateful if these can be submitted with any full or outline application.
- The main potential sources of contamination on the site do appear to have identified and we are therefore broadly satisfied with the preliminary assessment of the risks from contamination, as presented in section 13.9
- We are however aware of an outbreak of anthrax in part of the site in the 1960's which resulted in a pyre and disposal pit in the eastern part of the site. There is however no reference to this in report.
- The conclusions in the report in that ground investigation works are required to fully characterise the site and fully quantify the risks to future site users are accepted.
- Similar to comments made by the Environment Agency we would however strongly recommend that the applicants environmental consultant follow the risk management framework provided in Land Contamination: Risk Management and consider using the National Quality Mark Scheme for Land Contamination Management to ensure that land contamination risks are appropriately managed.

Environment Agency (summary)

- Full comments are attached.
- Section 13 appears to contain some inaccurate information regarding the geological members beneath the site. This should be corrected / clarified.
- The section on Ground Conditions identifies that there are possibly areas of made/reworked ground, which presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Section 13.6.1 states that

further site investigation should occur and the results of this will be used to inform the baseline conditions, which we support.

- Due to the contamination risks identified in section 13.5, we are likely to recommend planning conditions requiring particular reports prior to development proceeding (in line with NPPF paragraph 174).

Chapter 14: Climate Change

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

Chapter 15: Cumulative Effects

- No comments

Other Matters – Minerals Resources

- It is noted that no mention is made within the Scoping Request to the West Sussex Joint Minerals Local Plan (2018) and specifically, Policy M9 - Safeguarding Minerals. It appears that the site sits within the brick clay and building stone safeguarding areas, so a Mineral Resource Statement would be required to assess this impact and feasibility of minerals extraction prior to development. This matter should be given due consideration in light of Policy M9, and should not be scoped out.

END.



Historic England

LONDON OFFICE

Ms Angela Moore
Horsham District Council
Chart Way
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RH12 1RL

Direct dial: 020 7973 36

Our ref: PL00769123

Your ref: EIA/22/0002

1st April 2022

Dear Ms Moore

**Re: EIA/22/0002 - ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING
OPINION (Regulation 15 of the Town and Country Planning (Environmental
Impact Assessment) Regulations 2017)**

LAND WEST OF SOUTHWATER

Thank you for your letter of 15th March 2022 consulting us about the above EIA Scoping Opinion.

We welcome the fact that, in line with advice in the National Planning Policy Framework (NPPF), the proposed EIA will include archaeology and cultural heritage, to assess the likely effects which the emerging development might have upon a number of relevant heritage assets and their settings.

There are no scheduled ancient monuments or other relevant designated heritage assets within the site boundary but the site forms part of the setting of several surrounding listed buildings. Accordingly, we consider that the effects of development proposals are mainly related to potential impact on their significance through change of their setting.

The report produced by WSP to support the Scoping Opinion Request has identified twenty-six listed building for assessment, itemized in table 6-4 of the document. Twenty-three Grade II and one Grade II* listed assets are included within a 500m



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study radius from the site boundary; two additional Grade II* listed buildings are located to the north-west of Christ's Hospital School. Some of these heritage assets have been scoped out from the ES chapter based on their distance from the site, the nature of the intervening townscape/landscape, and the varying degrees of contribution given by the setting to their significance.

In general, we agree with the conclusions of this analysis.

However, with reference to the Grade II* listed Great House Farmhouse which, although not falling within the site, is enclosed by it, we have concerns that the potential for adverse impact of the proposed development on its setting has been discounted in the mentioned report. In this respect, although the document acknowledges at point 6.5.6 that the setting of Great House Farmhouse is likely to be altered as a result of the proposed development, it then concludes that with appropriate mitigation measures the effects can be reduced and minimised and would not be regarded as significant in EIA terms.

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

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

On this basis, we consider that, as the setting of Great House Farmhouse - which falls within the site boundary - and its relation to the open land which forms the farm, is of high historical and illustrative significance, any change to it would meaningfully alter the heritage value of the farmhouse itself, resulting in potentially significant effects in EIA terms.

We are content that the EIA will also consider the potential impacts on non-designated features of historic, architectural and archaeological interest. Of particular significance is a group of historic barns associated with Great House Farmhouse, included within the site. These structures, while forming part of the setting of the designated asset, contribute to our ability to appreciate the original farming operations across the farmstead, making an important contribution to the



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character and local distinctiveness of the area and its sense of place.

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

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

We support the proposed strategy for preserving historic landscape boundaries within the development and for assessing any known and potential below-ground archaeological remains within the site and its surroundings within 1 km from its boundary. The assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development.

It is important that the assessment is designed to ensure that all impacts are fully understood. In order to achieve this, the EIA should include a comprehensive Heritage Assessment devised as a separate document from the Landscape Visual Impact Assessment, due to the distinct content and purpose of the two reports.

We are content that the assessment will take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area.

The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits.

We would strongly recommend that you involve your own conservation officers and the archaeological staff at West Sussex County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential



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adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing 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
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Date: 04 April 2022
Our ref: 387184
Your ref: EIA/22/0002



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Dear Ms Moore

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town and Country Planning EIA Regulations 2017): Residential-led development to provide up to 1,500 homes (a mix of C2 and C3 use classes), an employment area, community and leisure facilities including a community hub, provision for nursery, primary and secondary school, gypsy and traveller pitches, landscaping, open space and new road improvements (hereafter referred to as the 'Proposed Development'). The Site is located west of and adjacent to Southwater, West Sussex and is located within the administrative area of Horsham District Council (HDC)

Location: Land West of Southwater

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 15 March 2022 and received on the same date.

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

Mrs Sally Ireland
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 174-175 and 179-182) 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 have regard to conserving biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available [here](#).

Designated nature conservation sites

The proposal is unlikely to adversely impact any European or internationally designated nature conservation sites (including 'habitats sites' under the NPPF) or nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Marine Conservation Zones).

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 174 and 175). 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 180 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 174 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.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice 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 100. 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 174 and 175 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 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

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

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

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

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

Air Quality

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

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

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>

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. 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. 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.



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

Your ref
EIA/22/0002

Our ref
DSA000010152

Date
05/04/2022

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: EIA Scoping Opinion (Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017).

Site: EIA/22/0002: - Land West of Southwater.


Thank you for your letter dated 15/03/2022.

Further to your recent pre-application for the above site Southern Water have the following observations to make in respect of the proposed development: -

- In determining the application, we ask that the Planning Authority take into account the provisions of Paragraphs 180, 182 and 183 of the National Planning Policy Framework (NPPF) regarding the proposed location of development in relation to existing uses that may be a source of pollution (in terms of odour). We apply a precautionary buffer zone for any development located within 500 metres of the boundary of a WWTW. The proposed development is located approximately 230 metres from the Christs hospital Wastewater Treatment Works, and as such we have applied this requirement to our planning consultation response. Please contact Southern Water to discuss and agree the Scope of the odour assessment.

- Due to the potential odour nuisance from a Wastewater Treatment Works, no sensitive development should be located within the 1.5 OdU odour contour of the WWTW. An Odour Assessment will need to be carried out by a specialist consultant employed by the developer to a specification that will need to be agreed in advance with Southern Water to identify and agree the 1.5 OdU contour. The service we provide to review the assessment and/or complete a site survey is chargeable, more information regarding our fees can be found on our website; Connection charging arrangements ([southernwater.co.uk](https://www.southernwater.co.uk)).

- Southern Water's current water records show that there is public foul sewer within the proposed development site. The public foul sewer requires a clearance of 3 metres on either side of the foul sewer to protect it from construction works and to allow for future access for maintenance.

- 
- No development, excavation, mounding or tree planting should be carried out within 3 metres of the public foul sewer without consent from Southern Water.
 - It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.
 - Due to the size of the development capacity assessments will be required to determine if the existing sewerage system can accommodate the proposed development flows.
 - Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer.
 - In situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations:
 - Reuse
 - Infiltration
 - Watercourse
 - Storm sewer
 - Combined Sewer

Guidance on Building Regulations is here:

[gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h](https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h)

- Southern Water requires a formal application for a connection to the public water main to be made by the applicant or developer.

In case you require any further information, please do not hesitate to contact us via the address shown in the footer of this document.

Yours faithfully,

Future Growth Planning Team
Business Channels

southernwater.co.uk/developing-building/planning-your-development

SOUTHERN WATER



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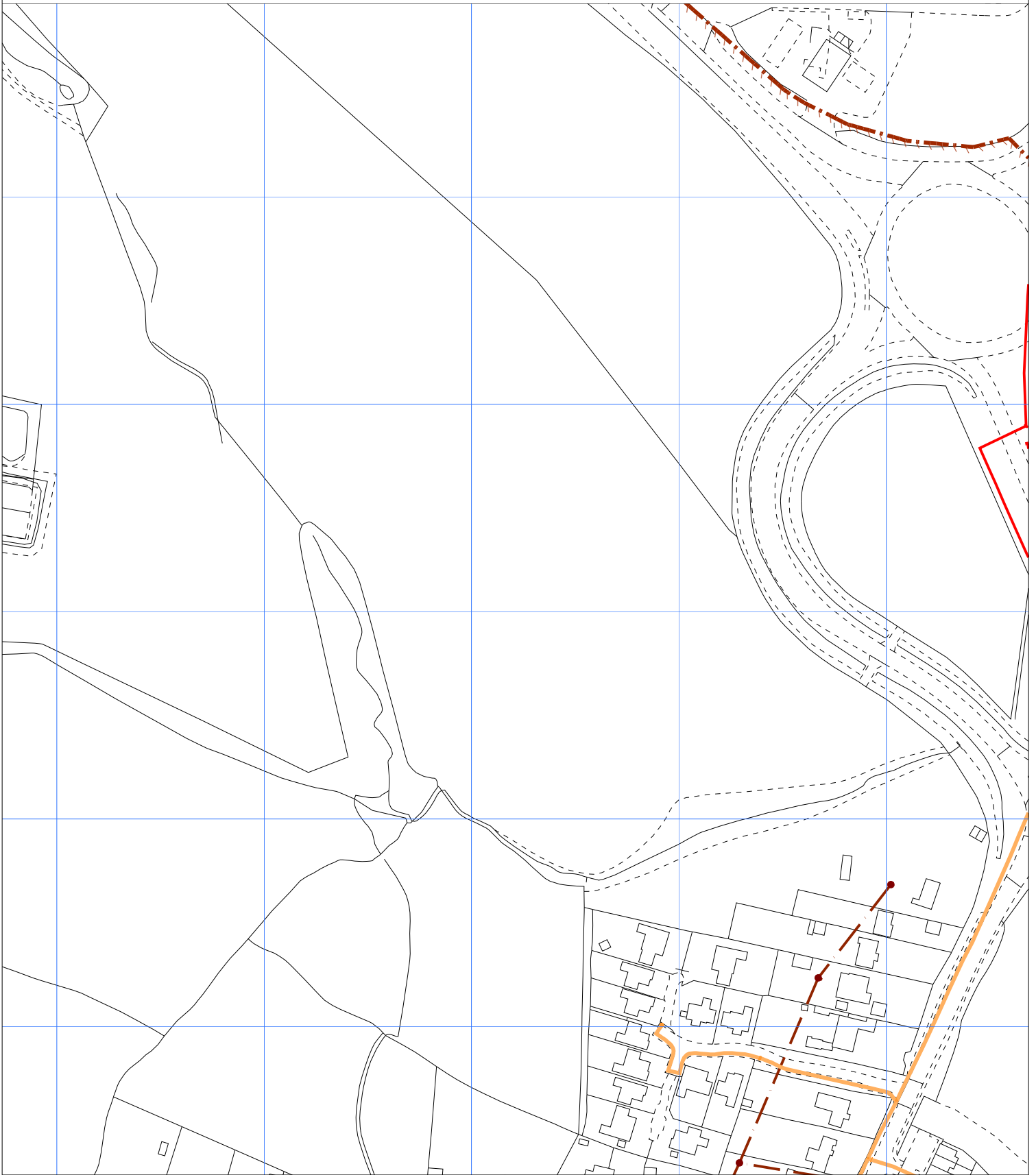
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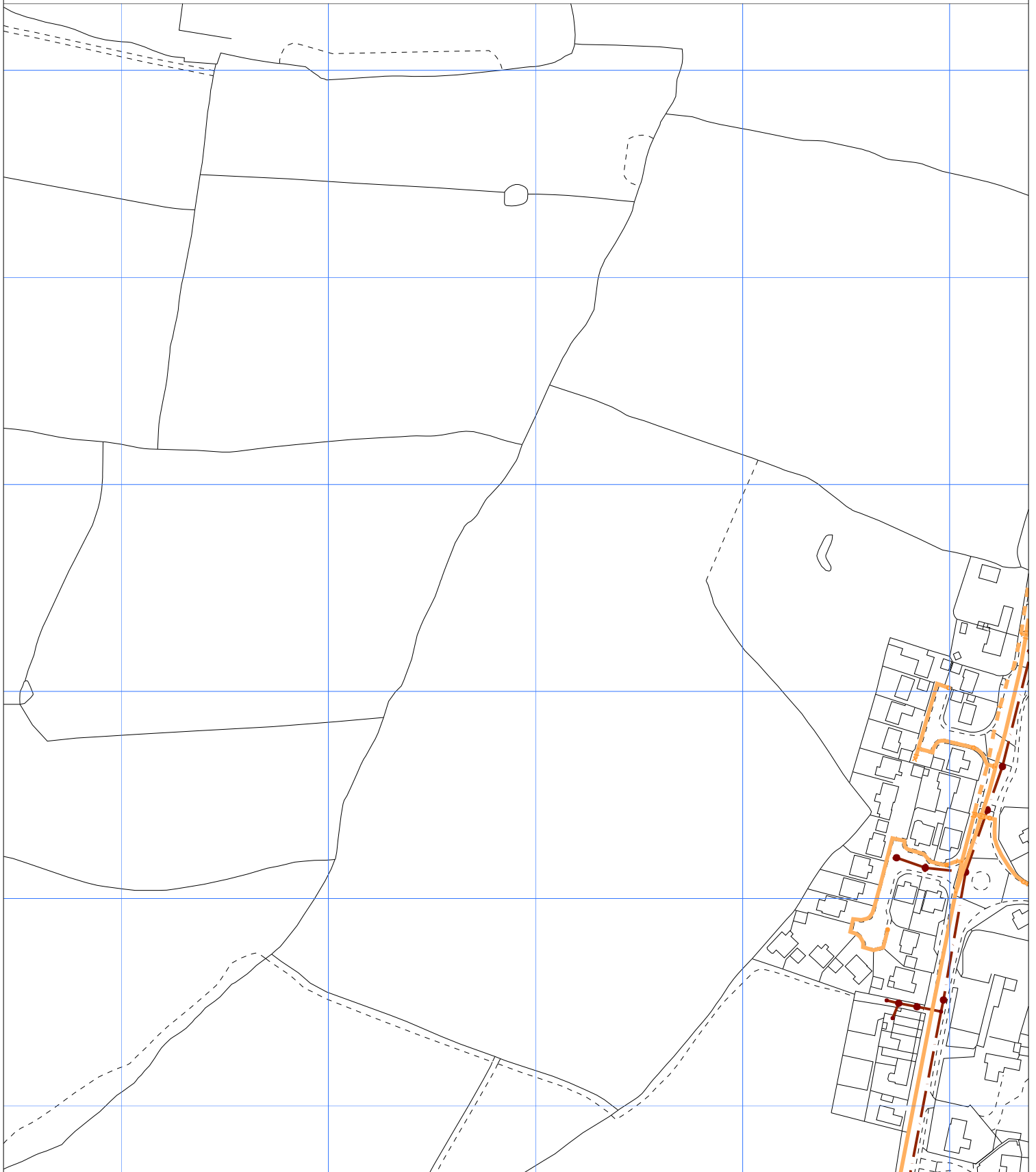
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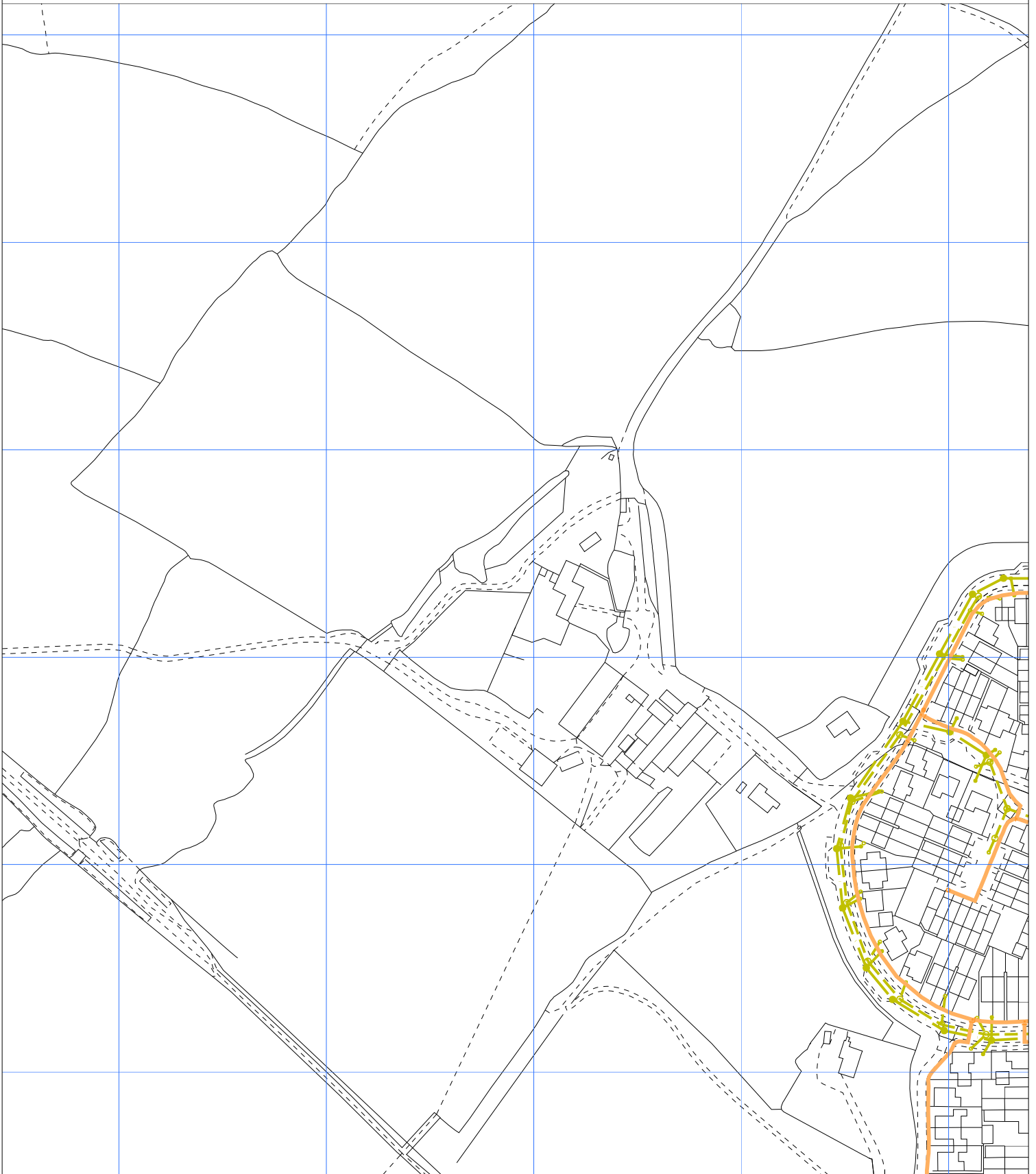
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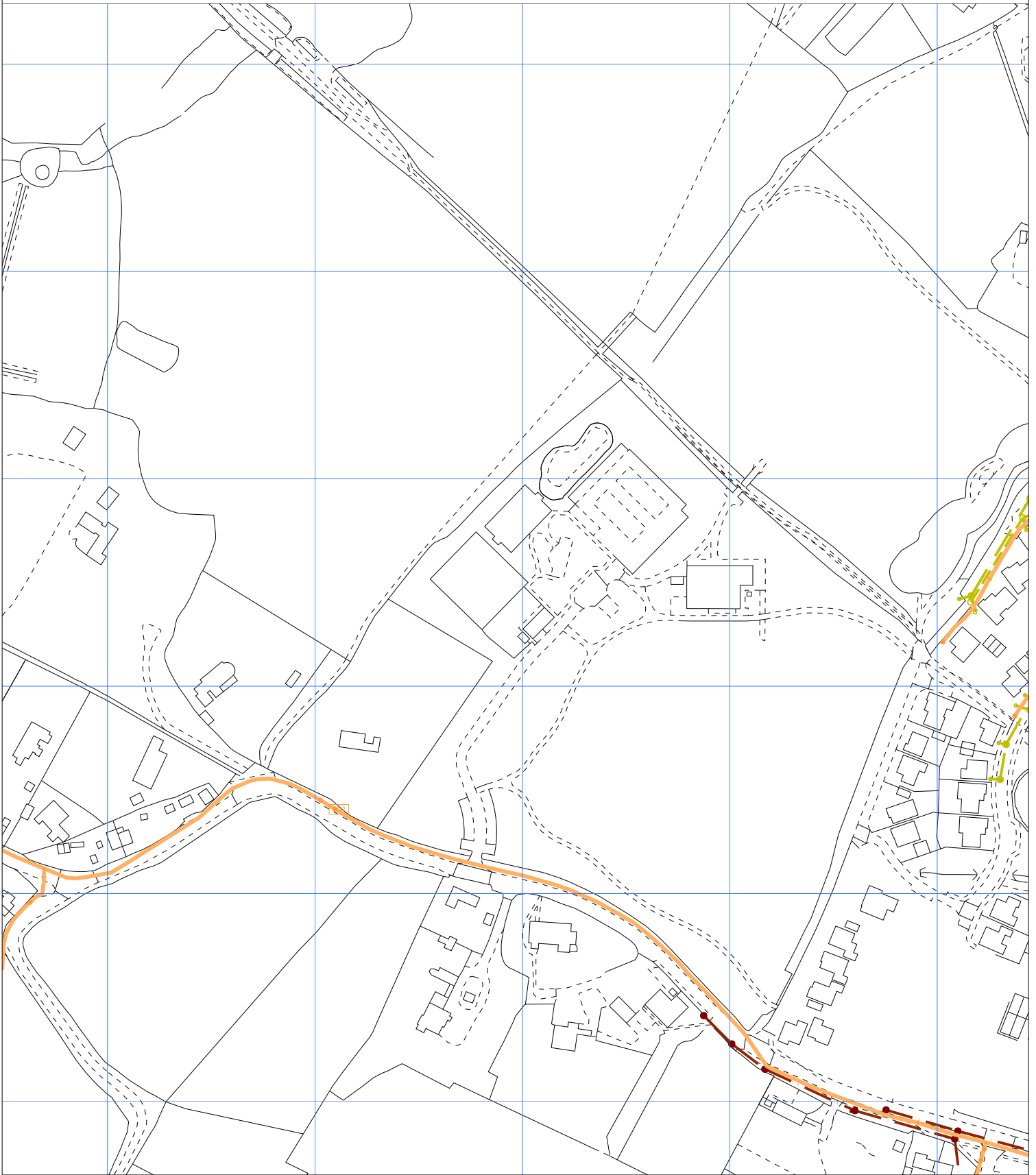
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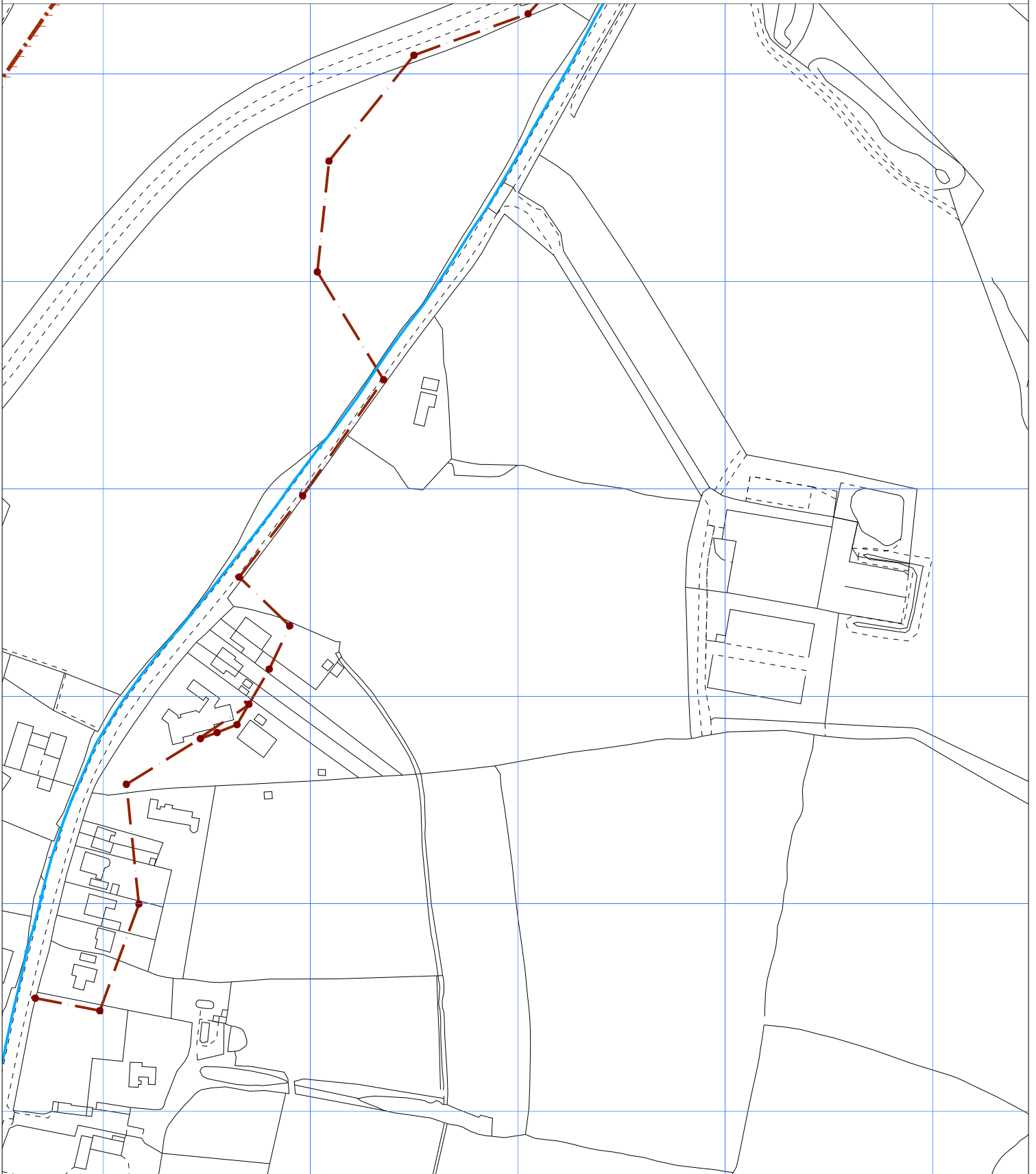
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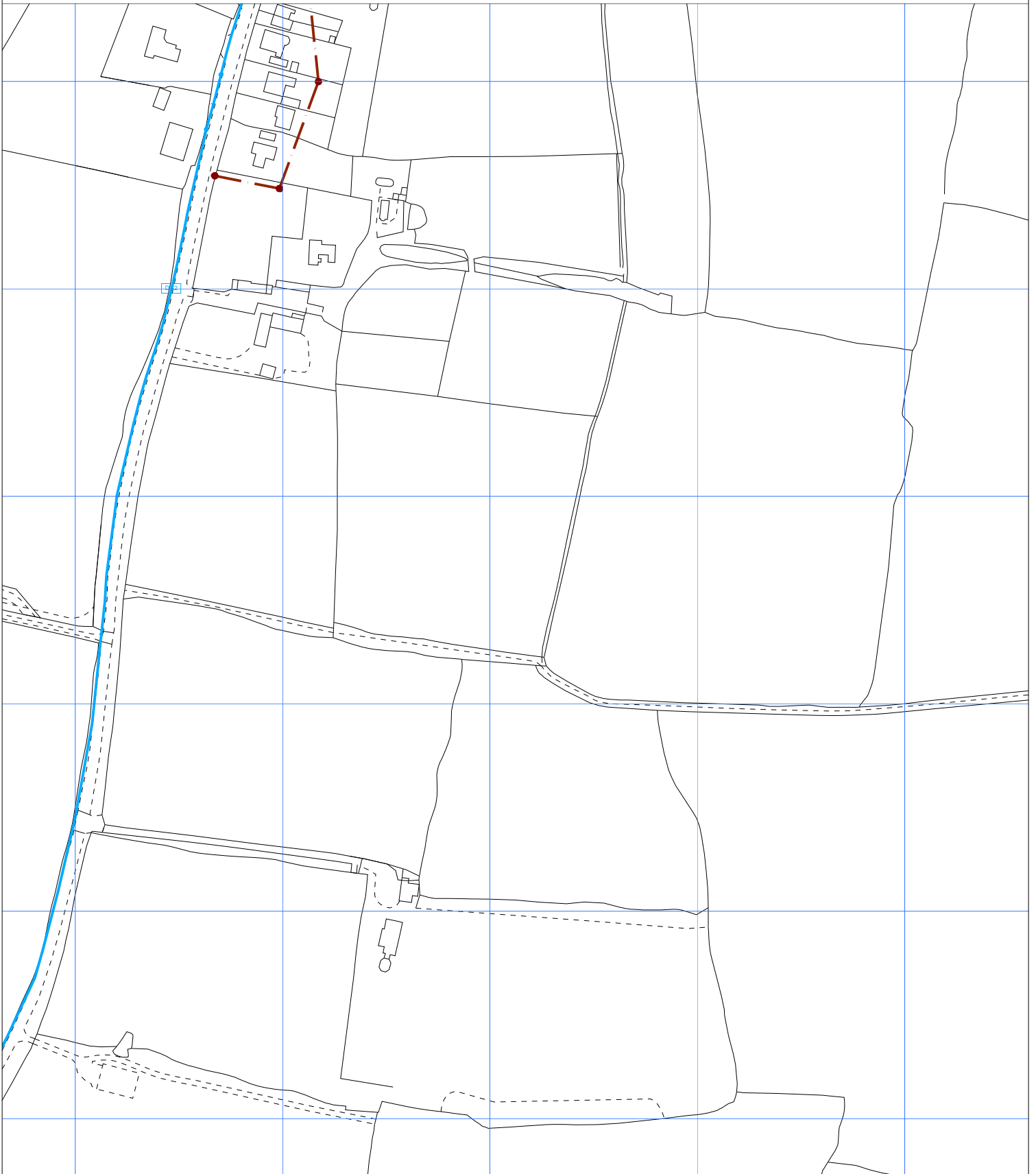
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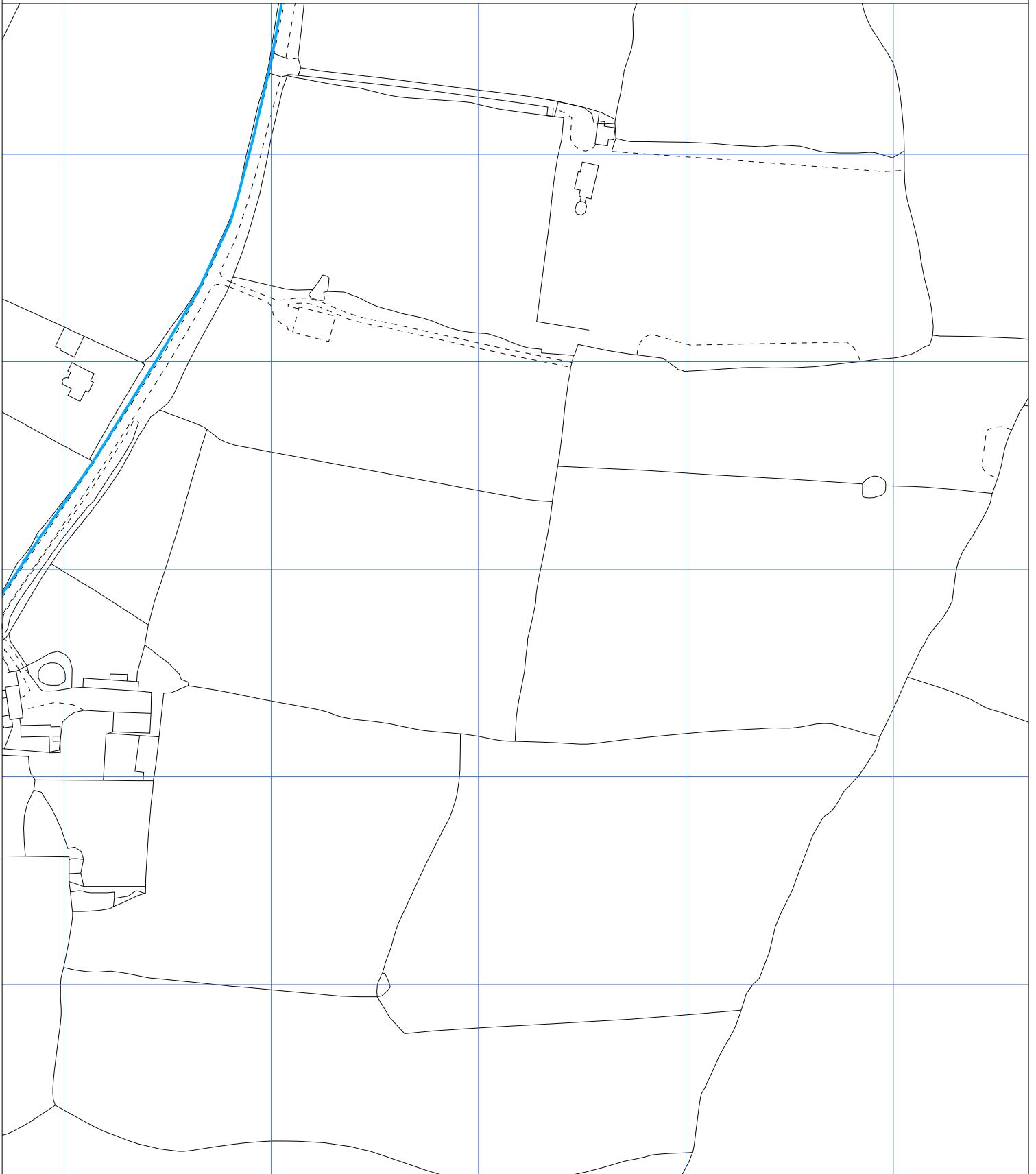
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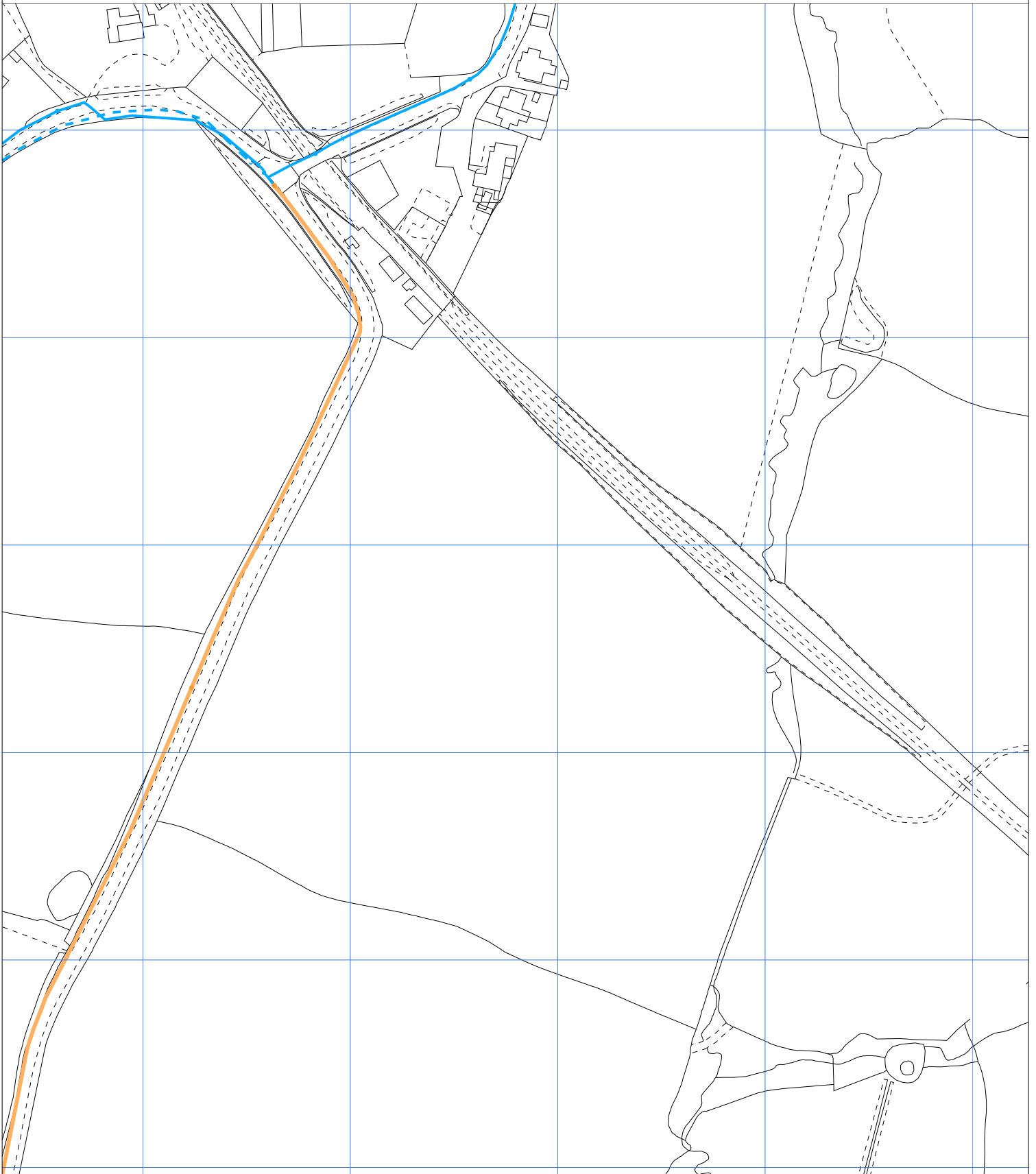
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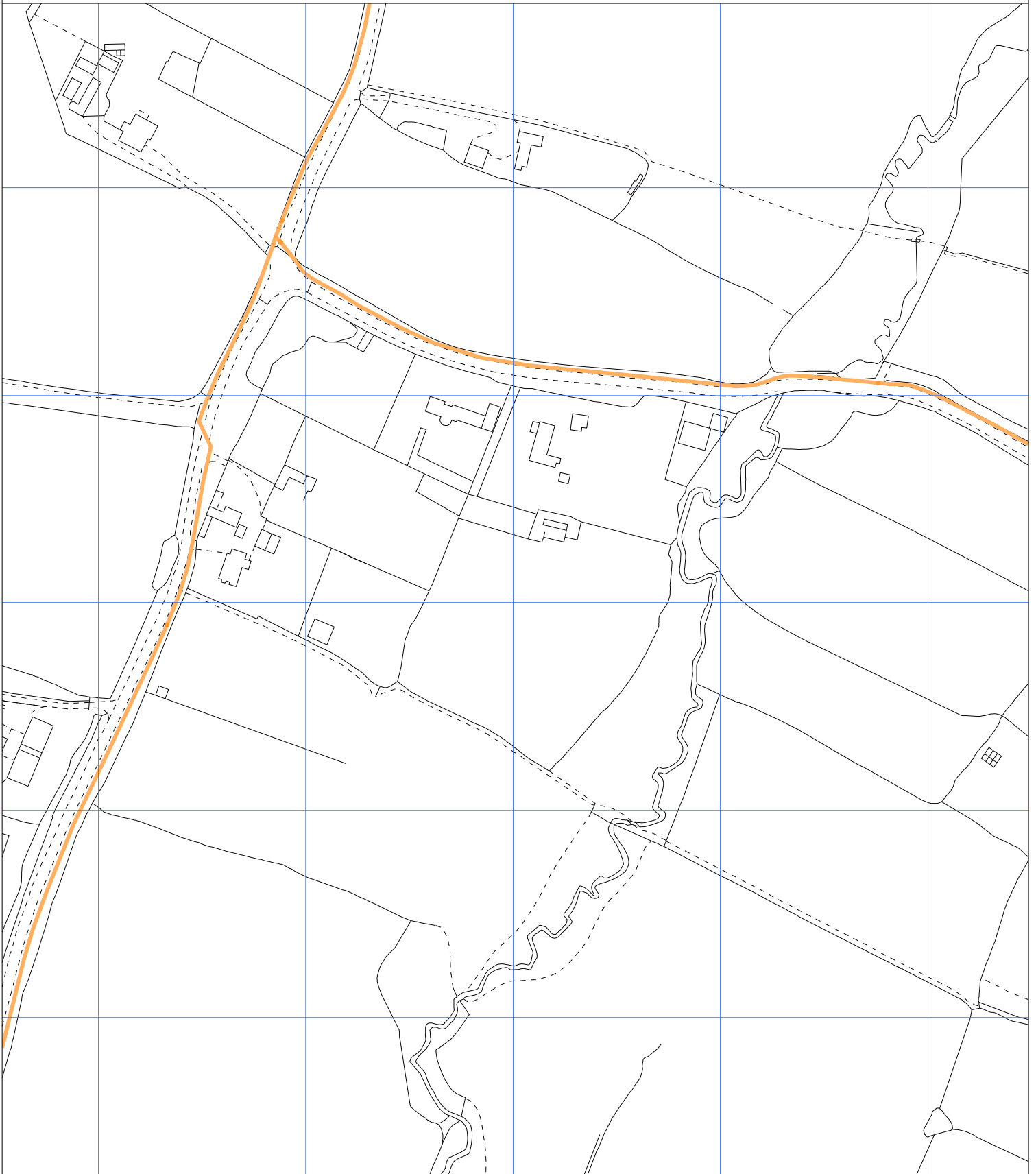
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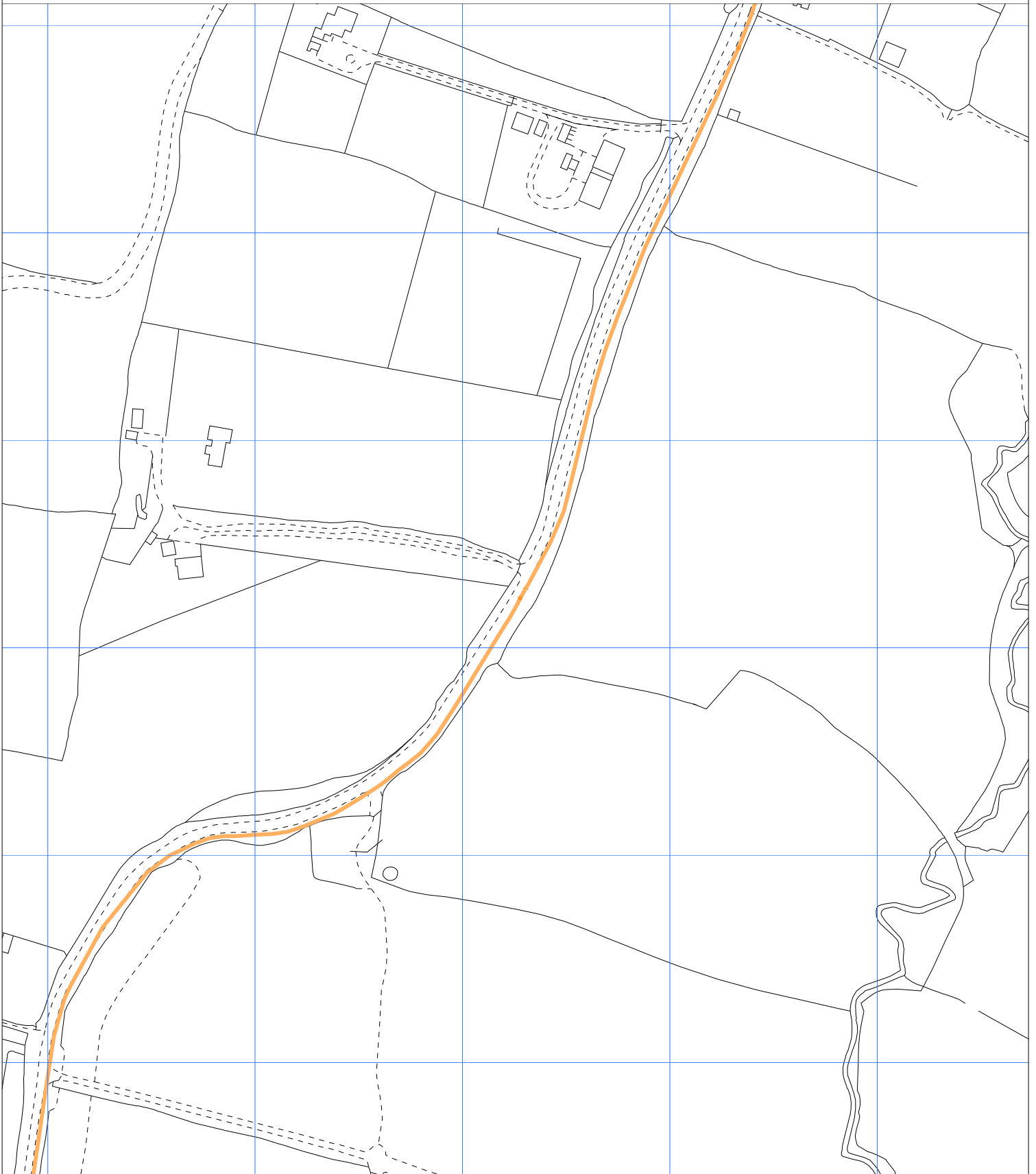
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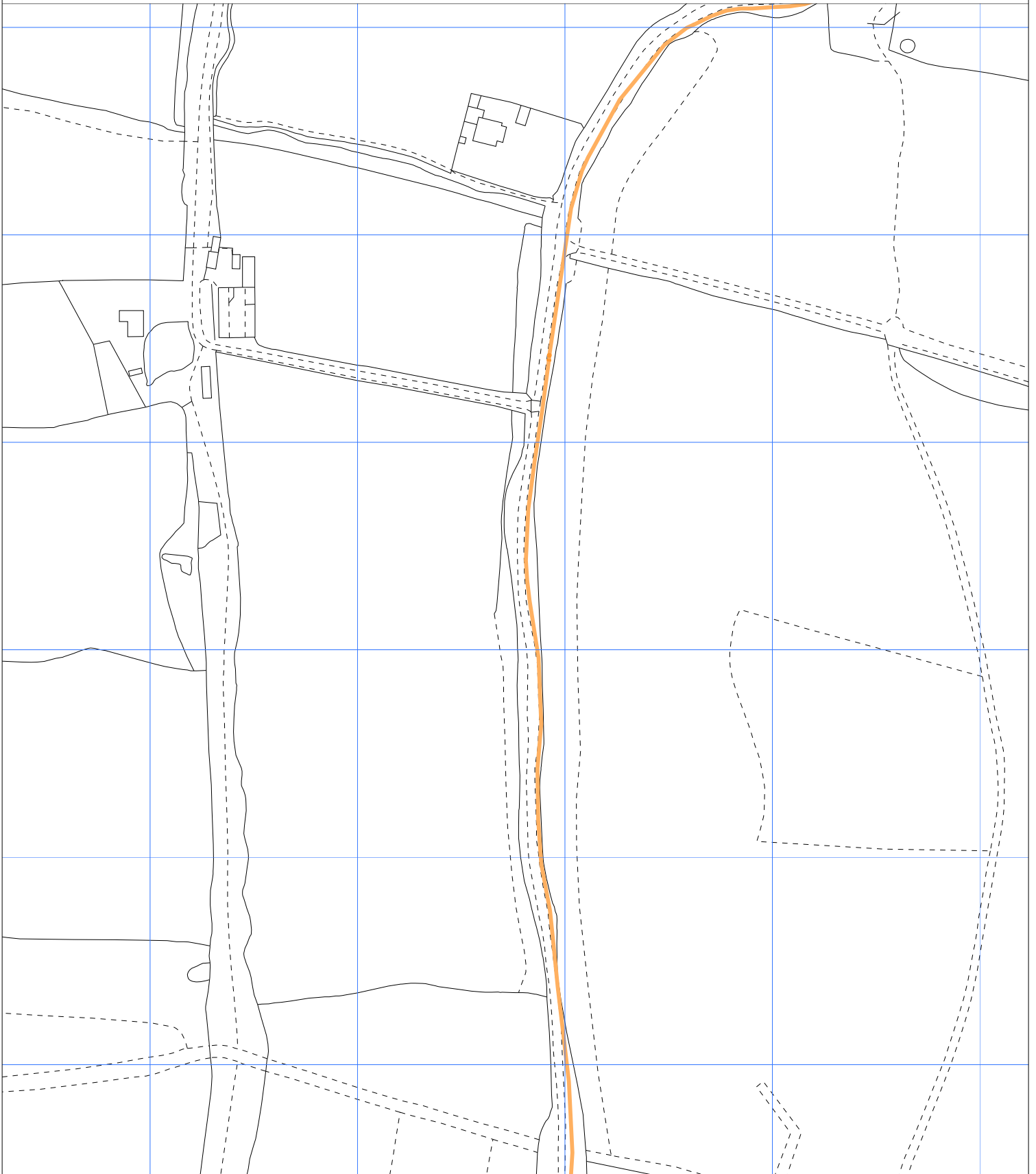
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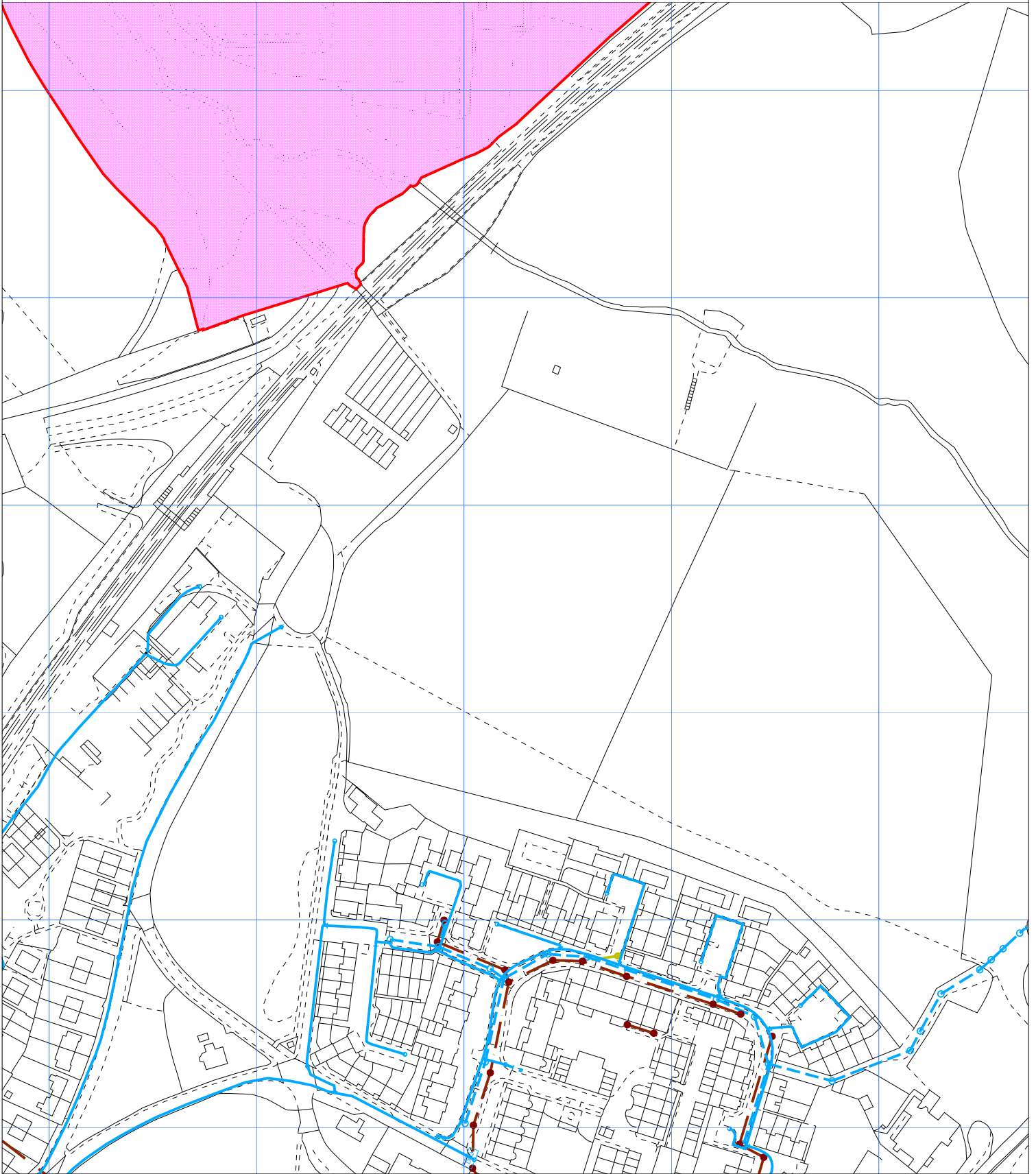
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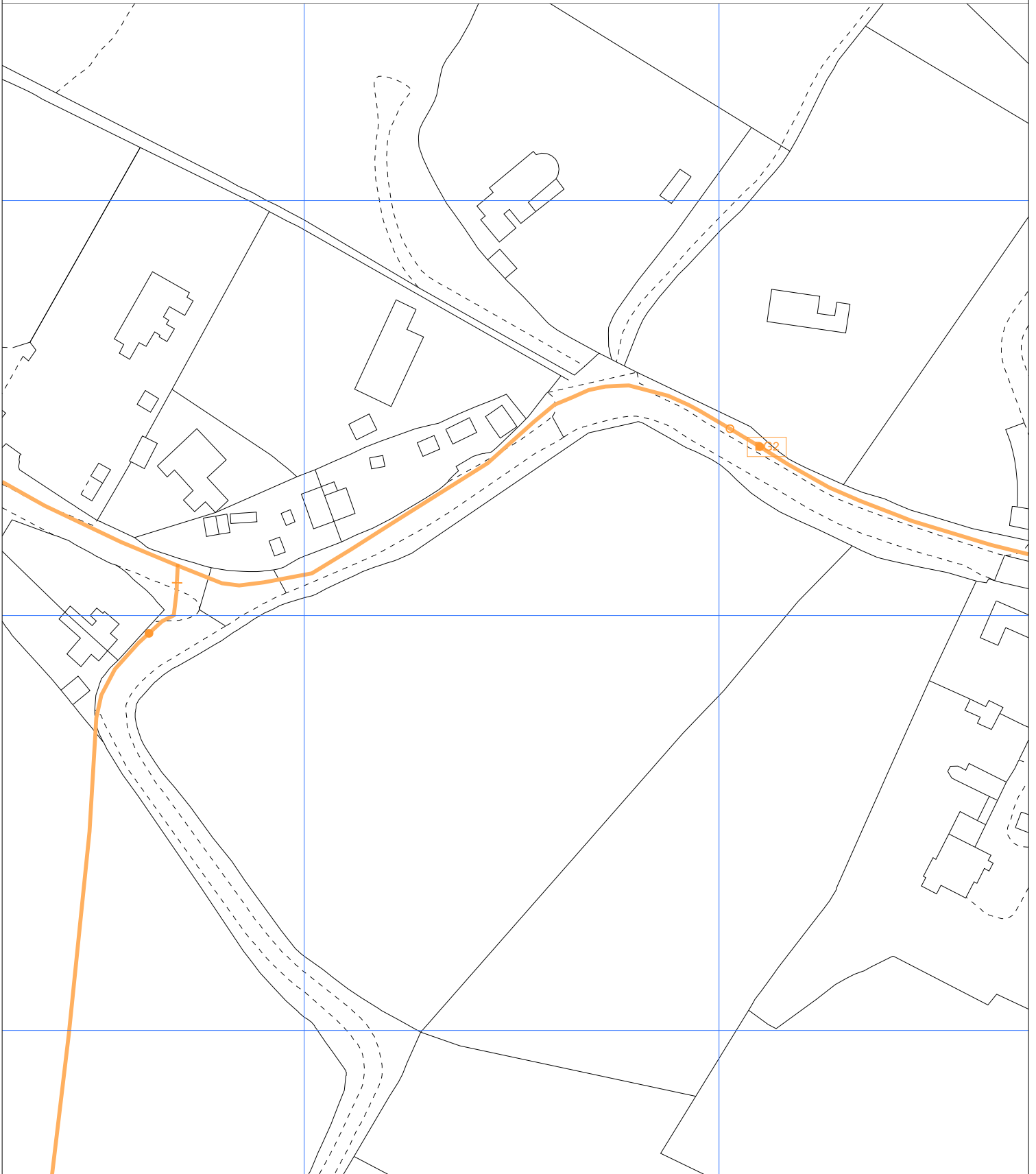
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Scale: 1:1250

Screen Print

WARNING: BAC pipes are constructed of Bonded Asbestos Cement

WARNING: Unknown (UNK) materials may include Bonded Asbestos Cement



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Date: 4-4-2022

Southern Water MapGuide Browser

Requested By:



Horsham District Council
Planning team
Park House
North Street
Horsham
West Sussex
RH12 1RL

Our ref: HA/2022/124046/01
Your ref: EIA/22/0002
Date: 05 April 2022

Dear Planning team (FAO: Angela Moore),

EIA SCOPING OPINION (REGULATION 15 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017).

LAND WEST OF SOUTHWATER.

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

Overall, we are generally pleased with the scope of the submitted information and the range of topics that have been proposed to be included within the Environmental Statement (ES).

Our focus for this site is mainly upon groundwater quality/impacts on controlled waters as a matter within our remit. The proposed site sits mainly on a bedrock of Horsham Stone Member, the southeast and northwest of the site are situated upon the Weald Clay Formation, no superficial deposits are noted on the site. While the Weald Clay formation is designated unproductive strata the Horsham Stone member is designated a Secondary A aquifer. Secondary A aquifers can support local supplies and may form an important source of base flow for rivers and streams. There are no nearby Source Protection Zones. However, the north of the site is designated a surface water drinking water protected area, so drainage must be carefully considered.

It is likely that we will recommend suitable planning conditions to protect groundwater resources when any planning application is submitted.

Please find our further specific comments set out below.

Hydrology and flooding

We support the statement in section 12.4.1 for the assessment of a water resource, flood risk and drainage, and that it should be conducted in parallel to a ground conditions and contamination environmental statement chapter (section 12.4.2) due to

interlinkage of these factors.

We also support the investigation of the potential use of SuDs (section 12.6.1) on the site to manage the related risks of surface water flooding. Further information on SuDs can be found on the CIRIA led website <https://www.susdrain.org/>.

Section 12.5.9 highlights the risks to surface water during construction and the need for appropriate site controls and surface water monitoring. A drainage strategy will be required to show the mitigation measures to be implemented during construction and following completion of the development.

Ground conditions and contamination

Unfortunately, section 13 appears to contain some inaccurate information. The Horsham Stone Member is described both as unproductive when it is a Secondary A aquifer, and the Weald Clay formation is described as a Secondary A aquifer when it is unproductive. Both geological members are also described as underlying the majority of the site. Which member underlies which areas is important due to the Secondary A aquifer nature of the Horsham Stone member. The information produced will have to prove that the controlled water will not be put at unacceptable risk by this development in line with paragraph 174 of the National Planning Policy Framework.

Our approach to groundwater protection is set out in [‘The Environment Agency’s approach to groundwater protection’](#). In implementing the position statements in this guidance, we will oppose development proposals that may pollute groundwater especially where the risks of pollution are high, and the groundwater asset is of high value.

The section on Ground Conditions identifies that there are possibly isolated areas of made/reworked ground across the site. This presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Section 13.6.1 states that further site investigation should occur and the results of this will be used to inform the baseline conditions, which we support.

It should be noted that the requirement for ground investigation on this site using penetrative methods can result in risks to potable supplies from, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Best practice should be followed to prevent this mobilisation.

The site investigation recommended in section 13.6 should have a scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes, and this should be submitted to the Local Planning Authority for approval. The scheme should provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post-development, for monitoring purposes will be secured, protected, and inspected.

Due to the contamination risks identified in section 13.5, we are likely to recommend a planning condition such as the one shown below, which will have requirements for particular reports prior to development proceeding:

1. *A preliminary risk assessment which has identified:*
 - *all previous uses;*
 - *potential contaminants associated with those uses;*

- a conceptual model of the site indicating sources, pathways and receptors; and
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

We would also recommend a planning condition relating to unidentified contamination, such as the one shown below:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) should be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

The above would ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

There may be other planning conditions recommended relating to groundwater resources depending on details provided with any planning application.

We recommend that the Applicant should:

- Follow the risk management framework provided in [Land Contamination: Risk Management](#), when dealing with land affected by contamination.
- Refer to our [Guiding principles for land contamination](#) for 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

We also advise consultation is undertaken with Horsham District Council's Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 174 of the National Planning Policy Framework.

Drainage

We would expect foul drainage to connect to a public sewer for a development of this size and considering that utilities do exist within the vicinity of the site. This is in accordance with guidance contained within the National Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications). We may object to any planning application if non-mains drainage for foul water is proposed.

The local water company should be liaised with to ensure capacity for both foul water and supply water.

Ordinary watercourse consent

We note that there are a number of drains/ditches present on the site. The prior written consent of the relevant lead Local Flood Authority (LLFA) is required for any erection of any flow control structures, culverting or diversion of any ordinary watercourses, including streams, land drains and ditches. This is called 'Ordinary watercourse consent'.

The LLFA for this area is West Sussex County Council. For further information, please refer to the LLFA's website (link below) and contact them directly for enquiries about applying for this type of consent –

<https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/>

Biodiversity

In regard to biodiversity enhancements, it is possible that deculverting some of the watercourses may help (i.e. creating open channels) depending on the specific circumstances on site. Deculverting can have benefits for ecology, geomorphology, flood risk, human safety and aesthetics. The Lead Local Authority would need to be consulted about this if it was considered a possibility and beneficial for any plans to enhance biodiversity.

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

Yours faithfully,

Environment Agency – Solent & South Downs

Sustainable Places Advisor: Anna Rabone

Direct dial: 02077 140525

Direct e-mail: anna.rabone@environment-agency.gov.uk

Note: The Environment Agency are not responsible for the content of any external websites.

WEST SUSSEX COUNTY COUNCIL CONSULTATION

| | |
|---|---|
| TO: | Horsham District Council FAO:Angela Moore |
| FROM: | WSCC Highways - Public Rights of Way |
| DATE: | 14 April 2022 |
| LOCATION: | Land West of Southwater, Worthing Road, Southwater |
| SUBJECT: | EIA/22/0002 EIA Scoping Opinion (Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017). |
| DATE OF SITE VISIT: | n/a |
| RELEVANT PUBLIC RIGHTS OF WAY NUMBER(S): | Directly affected: FP1653, 1654, 1655, 1656, 1658, 1660, BW1662, BW3568 (Downs Link & NCN223) Indirectly affected: BW1642 |
| 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.

It's pleasing to see that all affected PRoW are shown correctly within the EIA and it sets an expectation that these will be retained and improved in their existing, rural character.

PRoW Footpaths 1653, 1654, 1655, 1656, 1658 and 1660 would increase off-road connectivity across the site for all NMUs by being upgraded to Bridleways and having all-weather surfaces installed.

The whole of BW1662 is benefiting from resurfacing and drainage works this year by us. We would not want our improvements to BW1662 being disturbed and require the retention of the existing rural character with the hedgerows retained and maintained on an ongoing basis as part of the site's landscape management plan.

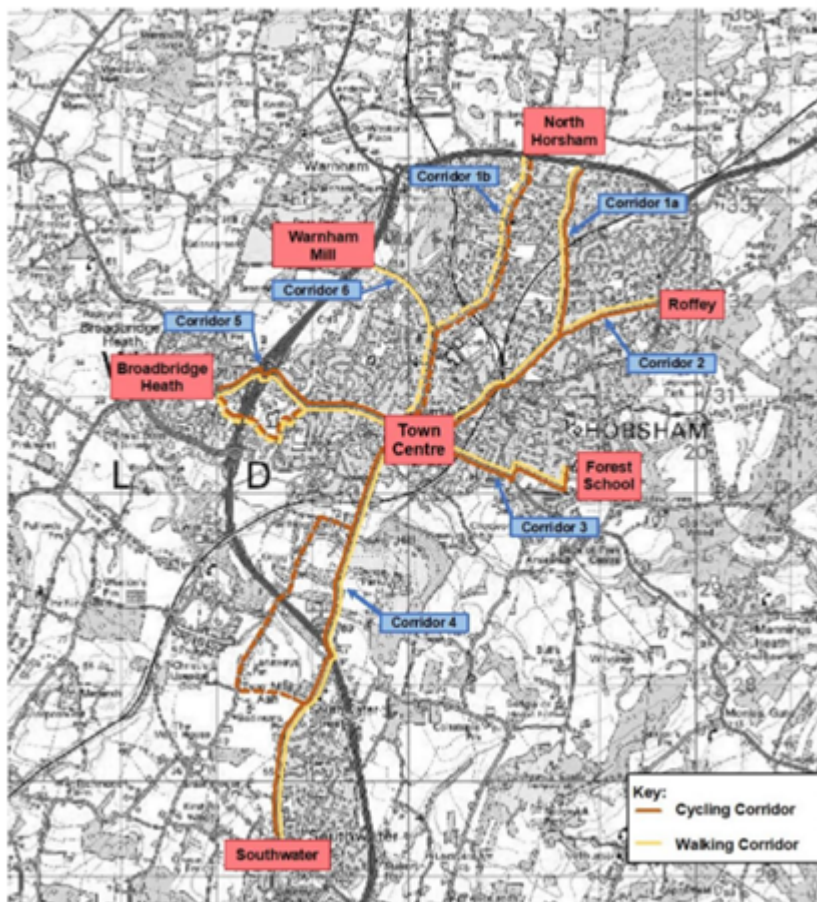
The surface of the Downs Link (BW3568 / NCN223) should be improved to an all-weather surface both as it dissects the site and also as it extends north-west towards and as far as Christ's Hospital.

Linking BW1662 to the Down's Link is BW1642. This will experience greater use with this development and should also be improved to mitigate against this. The bridleway is already largely tarmacked but there are sections at the eastern and western ends as highlighted in yellow below that would require appropriate improvement.



The site would provide the perfect opportunity to create a new north – south ‘I’ shaped bridleway heading north from Downs Link with extensions at the bottom to the bottom right and bottom left-hand corners of the Downs Link and again at the top of the site near the A24 to the top right and top left-hand corners. As well as improving connectivity throughout the site for all NMUs including disabled and equestrian users, this would largely facilitate an equivalent to the southern part of Horsham LCWIP’s aspiration for safe walking and cycling corridors along Corridor 4 (shown below) and could be mostly off-road until reaching the A24.

Cycling and Walking Corridors for Initial Development



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