

Matt Royal
Ramboll
Cornerblock
Two Cornwall Street
Birmingham
West Midlands
B3 2DX

Our ref: EIA/23/0007
Your ref:
E-mail: Jason.hawkes@horsham.gov.uk
Direct line: 01403 215162
Date: 27th November 2023

Dear Mr Royal,

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

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

Following your email requesting a formal Scoping Opinion for the proposed development at the Land West of Ifield site, please find below 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. The full comments of Crawley Borough, Historic England, the HDC Ecologist x2, Gatwick Airport, the Environment Agency and Natural England are attached for your information. These comments form part of the opinion.

In addition to consultation responses, we have also received comments from local residents. The comments can be viewed on our website (<https://www.horsham.gov.uk/planning>) using the ref: EIA/23/0007. You are advised to assess these comments.

This Scoping Opinion follows a previous opinion issued under reference EIA/20/0004 for the same site. The current Scoping Opinion is to address amendments to the proposal.

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

Yours sincerely

Jason Hawkes
Principal Planning Officer

Comments on Scoping Opinion Chapters

1. Introduction:

- Para 1.1.1: The report states that the application will now be in the form of a hybrid application. This is supported.

2. Site Context:

- Para 2.1.1: Reference should be made here to the flood risk areas (fluvial and surface water) within the site.
- Para 2.2.3: Reference should be made to the Ancient Woodland within Ifield Brook to the south east corner of the site. Reference should also be made to flood risk areas within Ifield Brook.

3. The Proposed Development:

- Para 3.1.3: It is unclear as to how Phases 1A and 1B are to be divided up and what they cover. This needs to be clear in any planning application.
- Para 3.1.4: The third part of the description of the proposal states '*This Hybrid application is for a phased development intended to be capable of coming forward in distinct and separate phases and / or plots in a severable way.*' This phrase does not need to be in the description of development. In addition, how the scheme will come forward and its phasing is a matter to be agreed under a planning application.

4. EIA Methodology:

No comment.

5. Agriculture and Soils:

No comment.

6. Air Quality:

The HDC Air Quality Officer has made the following comments:

- HDC has recently published the 2023 Annual Status Report, and its available on <https://www.horsham.gov.uk/environmental-health/air-quality/air-quality-reports-and-assessments>. The developer should use the latest version of the report.
- Monitoring should be considered on the Construction Mitigation Plan. As monitoring forms a vital part of construction, given the scale of the proposed development and the likely high number of road traffic movements generated during the construction phase, a monitoring plan should be included as a measure. Major applications should consider supplementing local authority monitoring with their own monitoring. This would help to increase model certainty and confidence in the results.
- Modelling: The assessment should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in the report (or appendices). Please provide full statistical analyses to give a full picture of the model performance.
- Refer to *Air quality and emissions mitigation guidance for Sussex (2021)*
- There is a potential for Non-Road Mobile Machinery (NRMM) emissions to adversely affect local air quality. The Local Air Quality Management Technical Guidance (TG22 –

7.29) states that ‘the following provides example measures of how NRMM emission from construction sites may be minimized’:

- *Ensure all equipment complies with the appropriate NRMM standards⁶²;*
- *Where feasible, ensure further abatement plant is installed on NRMM equipment, e.g. Diesel Particulate Filters (DPFs);*
- *Ensure all vehicles switch off engines when stationary – no idling vehicles;*
- *Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where possible; and*
- *Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).*

7. Biodiversity:

- The comments of the HDC Ecologist x 2 and Natural England are attached separately.
- Please note that Horsham District Council has been issued with a District-wide licence for newts which is regulated by Natural England. Details of the scheme can be found at: <https://www.horsham.gov.uk/planning/great-crested-newt-district-licensing-scheme>

8. Climate Change:

- Horsham District Council has agreed targets which includes indirect emissions to be carbon neutral by 2050. A key opportunity for the Council to address climate change will be to ensure that new developments are built to high sustainability standards, to reduce the demand for energy and reduce emission of greenhouse gases.
- Reduction in the demand for transport should also be incorporated wherever possible to reduce the impacts of traffic on climate change. Development needs to be designed to reduce reliance on carbon-based heat and electricity sources to reach these targets. These include renewable technologies such as heat pumps, district heating schemes or solar energy.

9. Cultural Heritage:

- Historic England’s comments are attached separately.
- The Council’s Senior Conservation Officer has commented that Historic England’s response is comprehensive and there is nothing he would like to add at this stage. The Conservation Officer does reinforce the point regarding a need to assess all heritage assets within the site as there may exist heritage assets that have not been identified and therefore do not appear in the H.E.R.
- The Council’s Archaeologist has commented that the site has considerable potential for archaeological remains to be present. The geophysical survey and previous fieldwork both in and adjacent to the site has established the presence of archaeological remains including a probable large settlement site spanning the period between the Late Bronze Age and the later Roman period, as well as number of other possible prehistoric/Roman enclosures. It can be anticipated that this will be accompanied by burials on the edges of the settlement or in the near vicinity.
- There is also the earthwork remains of a circular mound, the date of which is as yet unknown, although interpretations as a barrow, small motte and windmill mound have all been suggested. There are geophysical anomalies suggestive of iron-working pits, again of as yet unknown date, but they could be prehistoric, Roman or medieval in origin. There are also a number of areas of potential ironworking activity close to the River Mole and the Ifield Brook, and a possible bloomery. There is high potential for significant

palaeoenvironmental deposits associated with both water courses, and their former routes.

- It is therefore recommended that the proposed Cultural Heritage Chapter in the ES should comprise:
 - A desk-based assessment of the proposed development area – this should utilise the information available in the West Sussex Historic Environment Record and historic cartographic and documentary sources. This should include an assessment of both the historic environment sites and the historic landscape setting.
 - A re-assessment should be made of the aerial photographic evidence for the area, including the on-line digital data available on GoogleEarth. This should include rectification of both archaeological features and palaeochannels.
 - An assessment should be made of the available LiDAR data for the application site and rectified plots produced of both archaeological and historic landscape features identified.
 - If a geophysical survey is being undertaken it is recommended that a trial area is undertaken on an area of known archaeological deposits to assess its effectiveness prior to the remainder being surveyed.
 - An assessment should be made of the available borehole and BGS data for the site in order to establish the potential for palaeoenvironmental deposits within the valleys of the Mole River and the Ifield Brook.
 - An element of ground-truthing, in the form of trial-trenching, will be required to clarify the results of all of the surveys.
 - The results of the above will inform the development of a mitigation strategy for both preservation in situ and/or preservation by record where this is not possible.

10. Landscape and Visual Impact:

- The comments of Natural England are attached separately.
- The HDC Landscape Architect has commented that the development (phases 1a and 1b) proposes a shared cycleway/footway along the dual carriageway. There is opportunity to explore the cycle route and footpath passing through the new park rather than along the road which will be a more pleasant and safe environment but will also help in reducing the overall width of the road and its impact in the landscape. It is appreciated these comments are not within the purpose of the scoping opinion as they discuss details of the proposal, this is something that we will look to explore as part of an application.
- Para 10.3.8: The study area is proposed to be 2.5km. The Landscape Architect is aware that a while back viewpoints were agreed and presumably the 2.5km. Please submit the ZTV as part of the LVIA so that this can be double checked.
- Assessment methodology: Agree with the outline methodology but a detailed one must accompany the LVIA.
- Landscape character receptors: The Landscape Architect notes the Ifield Conservation Area designation is scoped out of the landscape assessment and to be addressed in the Cultural Heritage Chapter. Whilst this is acceptable in principle, the officer considers that the landscape setting (in this case the site to the western and part of the northern boundary of the CA) of the conservation area needs to be assessed as a landscape character receptor and as part of the LVIA assessment.
- The assessment needs to scope in the National Character Area 121: Low Weald and assess the effects the proposed development will have on the character area. Given its scale and nature, it is highly likely that the development will have an adverse effect on the NCA 121. Its significance needs to be established and considered.
- The effect of the proposals on the site itself and landscape features within (such as landform, structural vegetation, etc) also need to be assessed as a receptor.

- Description of possible likely events, Operational Phase, Para 10.5.4: The wider character area beyond the site is scoped out due to high level of containment. Whilst it is agreed the site may be visually well contained, it doesn't necessarily follow that there will be no effects on the wider landscape character, particularly considering the scale and nature of the development proposals. This must be scoped in as adverse effects are likely to be experienced beyond the red line boundary. The assessment will establish if these are significant or not.

11. Noise and Vibration:

- The comments from Gatwick Airport are attached separately.
- The Council's Environmental Health Team have made the following comments:

Construction Noise:

- For construction noise the assessment of impact has been undertaken with regard to Annex E of BS5228-1 and particularly the thresholds of significant effects. Annex E details several methodologies for assessing impacts but for all significant impacts from construction noise are only considered to occur above 65dBLAeqT. Works will take part in areas where background noise levels are lower than this and therefore adopting this approach may not fully portray the noise impacts from the construction phase. For longer term construction projects lower noise limits should be considered.
- The adoption of the thresholds quoted in Annex E to BS5228-1 as LOAELs and SOAELs is questioned. BS5228-1 does not reference WHO documents and principally relies on publications regarding protection of site workers from noise. The assessment methodology in Annex E states that other project-specific factors, such as the number of receptors affected and the duration and character of the impact, will also determine if there is a significant effect.
- It is important to ensure the potential noise impacts for the receptors are fully understood beyond the narrow confines of BS5228-1. The applicant should illustrate the potential magnitude of the noise impacts by comparing the predicted construction noise levels to the existing ambient noise levels at each receptor location.
- The methodology for the identification of receptors should be clearly explained. This is important for establishing if all relevant receptors have been identified and factors such as differences in topography have been included in determining the predicted construction noise levels.

Aviation Noise:

- The assessment adopted for the EIA adopts annualised metrics which do not account for worst case single mode operations at the airport.
- Annualised metrics are unlikely to capture the full impact of aviation noise, particularly for overflight, and additional metrics should be employed. This should include consideration of single-mode noise impacts to ensure worst case effects are fully captured.
- Gatwick Airport Limited (GAL) has provided information on air traffic movements associated with northern runway project in response to questions from the local authority's aviation consultant that show an projected increase in morning peak hour departure along the Route9/WIZAD route which may impact the development site. This is projected to increase from 0% departures in 2019 to 13% of total departures when the Northern Runway Project is fully operational.
- For westerly take offs the peak time of use will be 06:00 to 07:00. Route four is predicted to be saturated and Route 9/Wizad – tactical offset route will be triggered to alleviate resulting air space congestion. This route directs air traffic to the south and east over Horsham.

- GAL have maintained that WIZAD cannot be used for schedule departures as it is available to NATS as a tactical offset route to relieve airspace congestion. Therefore, it does not need to be considered as part of the Northern Runway Project. However, GAL clearly anticipate increase the use of WIZAD as a key to achieving full operational potential of the Northern Runway Project.
- This would represent a significant increase in flights using the WIZAD route with the result increase in overflight. This further reinforces the need for metrics other than the annualised LAEQ to ensure this increase is properly modelled and to allow appropriate mitigation to be considered.
- The implementation of sound insulation measures is likely to significantly increase the risk of overheating in affected dwellings and therefore insulation scheme should also include an overheating assessment and provision of mechanical ventilation. The energy cost associated ventilation and particularly cooling in warmer weather can be significant. Measures such as PV panels and battery storage to offset energy use should also be considered as part of any scheme.

12. Socio-economic Effects and Health:

- Sport England has commented that, whilst it is not within their remit to comment on Scoping Opinions, any subsequent planning application should consider the implications for sport in the context of NPPF Paragraphs 98 and 99, local plan policy and any strategic evidence set out in local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application. In that respect we consider that the application should be accompanied by a full sports impact and mitigation report.
- As previously stated, one of the most significant socio-economics effects would be to the residents of Crawley, especially those living to the west of Crawley who currently enjoy the use of this rural location for their wellbeing. As such, it is important that links to the countryside and access to open spaces are retained.

13. Surface Water Resources and Flood Risk:

- The comments of the Environment Agency are attached separately.
- Thames Water and Southern Water have no comment.
- Lead Local Flood Authority (LLFA) at West Sussex County Council have commented that as this is an EIA scoping it is accepted that the majority of the surface water related information will be included within the ES and FRA/Drainage Strategy, therefore the LLFA will provide detailed comments when the hybrid planning application is submitted. Nevertheless the LLFA have the following comments to make:
 - The FRA must include all sources of flood risk. The drainage strategy and supporting information submitted must use up to date parameters. It is strongly suggested that the use of SuDS is considered from the beginning of the design process for the masterplan for each phase, instead of reliance on traditional piped networks. Further guidance on this can be found in the PPG Flood risk and coastal change.
 - The applicant is to complete a sequential/exception test which includes surface water flood risk.
 - The LLFA offer pre-app advice. This can be obtained using: <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/flood-risk-management-pre-application-advice/>

14. Transport:

- West Sussex County Council Highways has commented that, for the purposes of the EIA scoping, it is accepted that the majority of the transport related sections of the Environmental Statement will be drawn from the Transport Assessment (TA) prepared to review the transport impacts of this development.
- WSCC Highways have and continue to be involved in the preparation of the TA. As such WSCC will influence the content of the ES through on-going discussions on the TA. No detailed comments are consequently considered necessary for the current scoping.
- Nevertheless for the purposes of the scoping, WSCC have two comments.
 - The use of an opening year of 2026 as stated within 14.3.7 seems optimistic considering no planning application has yet been submitted or accounting for potential approvals being required ahead of works commencing.
 - Agreement is claimed within point 14.2.2 to the content of the Transport Assessment for various transport related matters. It is fair to say that all matters listed have been discussed, but these are very much on-going. These matters could not be taken as agreed until the final TA has been provided and accepted by WSCC through the planning process.
- Active Travel England (ATE) have commented that they do not currently provide detailed advice at pre-application stage. However, ATE have produced a standing advice note that summaries some of the key active travel criteria that ATE will assess when consulted on a formal application. The standing advice can be found here: <https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

15. Waste and Resource Management:

- West Sussex County Council Minerals and Waste has commented that the site is within a Mineral Safeguarding Area for brick clay and building stone. It is noted that, within the submitted Scoping Opinion request, the applicant proposes to submit a Mineral Resource Assessment as part of their planning application should one come forward. WSCC would emphasize the importance for the proposal to demonstrate compliance with M9 (Joint Minerals Local Plan, 2018).

16. Major Accidents & Disaster:

- No comment.

Other Comments:

The HDC Arboricultural Officer has commented that, given the limited amount of tree-related information within the EIA Scoping Opinion Request Report, it is not possible to fully ascertain what the full Arboricultural impact of this proposal would be, and this needs to be appropriately assessed should a complete application be forthcoming.

Appendix A: The list of developments to be considered in the Cumulative Effects Assessments needs to include the following sites listed below. The list will also need to take into account any sites which come forward as a result of the current Local Plan Review.

Reference	Site	Description	Status
DC/15/2813	Kilnwood Vale	Outline approval for the development of	Approved 28.04.2016 and in progress. Currently at

		<p>approximately 2500 dwellings, new access from A264 and a secondary access from A264, neighbourhood centre, comprising retail, community building with library facility, public house, primary care centre and care home, main pumping station, land for primary school and nursery, land for employment uses, new rail station, energy centre and associated amenity space. Full planning permission for engineering operations associated with landfill remediation and associated infrastructure including pumping station. Full permission for the development of Phase 1 of 291 dwellings, internal roads, garages, driveways, 756 parking spaces, pathways, sub-station, flood attenuation ponds and associated amenity space. Full permission for the construction of a 3 to 6 metre high (above ground level) noise attenuation landform for approximately 700 metres, associated landscaping, pedestrian/cycleway and service provision (land known as Kilnwood Vale)</p>	<p>approximately 1,200 occupations. Only dwellings built so far. This site is directly south of the Land West of Ifield site.</p>
DC/17/2481	Reserved Land – Kilnwood Vale	<p>Outline planning application for the development of approximately 227 dwellings (between 204 and 250 dwellings) with the construction of a new access from Calvert Link, a pumping station and associated amenity space (all matters reserved except for access)</p>	<p>Approved 04.10.2018 with Phase 6A largely complete. This is the land to east of the Kilnwood vale site and is extension of the site.</p>
DC/18/2687	Novartis Site, Wimbehurst Road, Horsham	<p>Outline planning application for the erection of up to 300 dwellings (C3) including the conversion of existing offices buildings 3 and 36)</p>	<p>Approved 11.02.2020 – not yet commenced</p>

		<p>up to 25,000sqm of employment (B1) floorspaces and provision of 618sqm of flexible commercial/community space (A1 A2 A3 D1 Creche) use classes) within the ground floor of converted building 36. Improvements to existing pedestrian and vehicular accesses from Parsonage Road and Wimblehurst Road, new cycle and pedestrian accesses from Parsonage Road, together with associated parking and landscaping. All matters reserved except for access.</p>	
DC/09/2138	Land East of Horsham – Highwood Site	<p>Development primarily of up to 1044 dwellings including provision of employment floor space, fire station, community centre and expanded school facilities. Construction of a principal vehicular access from A24 (southbound) together with secondary bus/cycle/pedestrian accesses from Hills Farm Lane, internal highway network, diversion of existing public footpaths and a replacement footbridge over A24. Formation of associated landscape works including playing fields, allotments, recreation facilities and construction of acoustic bund/fence alongside A24 (Outline)</p>	<p>Approved 17/08/2010 – more than half way through completed. Approx 575 units completed</p>

End