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| David Churchill  Carter Jonas  One Chapel Place  London  W1G 0BG | Our ref: | EIA/22/0003 |
| Your ref: |  |
| E-mail: | Jason.hawkes@horsham.gov.uk |
| Direct line: | 01403 215162 |
| Date: | 28 October 2022 |

Dear Mr Churchill,

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

**Request for a formal EIA Scoping Opinion for the proposed development at the Horsham Golf & Fitness site, Horsham.**

Following your email requesting a formal Scoping Opinion for the proposed development at the Horsham Golf & Fitness site, 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. The full comments of the Environment Agency, Historic England and Natural England are attached for your information. The comments of the HDC Ecologist are to follow.

In addition to consultation responses, we have also received 1no. comment from a local resident which raises an objection to a planning application on this site, and cites overdevelopment, lack of infrastructure, impact on traffic as reasons to support the objection. The full comments, as well as all consultation comments received, can be viewed via our website (https://www.horsham.gov.uk/planning) using the ref: EIA/22/0003.

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

Yours sincerely

**Jason Hawkes**

Principal Planning Officer

**Scoping Opinion of Horsham District Council**

EIA Scoping Report

* Reference should be made in the description of the site location to the following:
* Horsham Football Club and all its facilities.
* The high pressure gas pipeline which runs through the site.
* The ancient woodland and trees protected by tree preservation orders.
* The description of development needs to state the quantum of proposed employment provision, retail provision and working spaces as a maximum so that the provision of these areas can be fully covered by the ES.
* The description of development needs to be clear that the proposal is for an outline application with all matters reserved except access. It is recommended that ‘access’ should include pedestrian and cycle access.
* It is not agreed that the following is scoped out of the report:
* Arboriculture: The ES will need to take into consideration the existing ancient woodland and TPOs in and around the site. The site also includes large areas of mature trees and hedgerows which should be assessed under an Arboricultural Assessment Report and retained as much as possible under any proposal.
* Traffic and Transport: This matter is fundamental to environmental impact and should not be scoped out the report.
* Water Resources, Flood Risk and Drainage: The issue of water neutrality is fundamental to the potential environmental impact of this major application and should not be scoped out. In addition, flood risk and drainage are also considered significant environmental factors that need to be included in the ES report.

Annex A: Approach to Scoping and EIA Methodology:

* No comment.

Annex B: Planning Policy Context:

* The site is within Southwater Parish. Southwater Parish have a made Neighbourhood Plan which is also part of the Development Plan. The site is also covered by the West Sussex Joint Minerals Local Plan (2018).
* The relevant HDC and WSCC Supplementary Planning Guidance Notes and Planning Advice Notes are as follows:
* Planning Obligations and Affordable Housing Supplementary Planning Document (2017)
* Community Infrastructure Levy (CIL) Charging Schedule (2017)
* Supplementary Planning Guidance (September 2020) - revised county parking standards and transport contributions methodology
* Air Quality and Emissions Mitigation Guidance for Sussex (2020)
* Planning Advice Note: Biodiversity and Green infrastructure (2022)
* Planning Advice Note: Facilitating Appropriate Development (2022)

Annex C: Cumulative Schemes:

* HDC would require the following to be considered under cumulative effects:
* development comprising more than 10,000 sq m of gross development floor area or more than 150 residential units;
* minerals and waste developments;
* significant highways or infrastructure schemes, as stipulated within Highways
* public transport schemes.
* Please note that an application for 1,500 dwellings & other uses at Land North West of Southwater (ref: DC/22/1916) has been submitted.

Annex D & E: ‘Scoped In’ & ‘Scoped Out’ Topic Sheets:

* Not included in the submission.

Annex F: Archaeological Desk Based Assessment (July 2022):

* The HDC Archaeological Consultant has commented that the submitted documentation identifies that the application will include cultural heritage as one of the main chapters within the EIA. They are in agreement with the assessment of the archaeological potential of the site within the submitted desk-based assessment. The northern parts of the site are located within an Archaeological Notification Area associated with the historic estate at Denne Park, forming part of the parkland to that estate. The site was subsequently used as part of the D-Day landing mobilisation camps. Previous archaeological fieldwork on the site has identified activity dating to the Roman period, a possible medieval deer park boundary pale as well as evidence for post-medieval drainage and possible World War II encampments.
* This fieldwork was undertaken as monitoring of land-forming during the golf course construction phase. The archaeologists specifically noted that they considered that the construction work had been limited to a subsoil horizon and that the survival of archaeological remains across the site is likely to be good. There will however be localised disturbance relating to the construction of bunkers and ponds.
* Based on the submitted document the EIA will be compliant with the requirements of paragraph 194 of the National Planning Policy Framework and that Archaeology warrants inclusion within the EIA.

Annex G: Built Heritage Baseline Assessment (July 2022):

* The HDC Senior Conservation Officer has commented that the response provided by Historic England is comprehensive and their recommendations should be followed by the applicant.

Annex H: Landscape and Visual Impact Assessment (LVIA) Methodology:

* The HDC Landscape Architect has the following comments:
* Para 4 – please note Horsham District Landscape character assessment 2003 (link here) is a separate document from the West Sussex Landscape Assessment. Also see Horsham District Capacity Study, which can be viewed via the HDC website.
* Para 7 – reference is made to an option for the expansion of Tower Hill settlement. It is unclear what this relates to.
* Para 8 – agreement of location and number of viewpoints to follow once ZTV and updated viewpoint locations are provided. Please also indicate the proposed types of visualisation to be used (in accordance with LI Technical Guidance Note 06/19). Night time receptors also need to be considered.
* Para 10 – users of the Horsham Football ground also need to be considered.

Annex I: Groundsure Enviro Insight and Geo Insight Report:

* No comments.

Annex J: Phase 1 Land Contamination Assessment:

The HDC Environmental Health Team have reviewed the RMA Environmental Phase 1 Desk Study Report dated 18th August 2022, submitted in support of the application, and we have the following comments to make.

* The site has a U1 waste exemption and potential infringements of this U1 were historically reported to the Environment Agency by a HDC Officer, we are not aware however that any action was taken. We note that the importation of material and infilling is identified in the above mentioned Phase 1 report, this imported material does however require extensive investigation to ensure that it is adequately characterised.
* We agree with the conclusions in the report, notably that a targeted site investigation will be undertaken in those areas where there is potential historic contamination, and the area is proposed to be exposed soils or planting and gas monitoring will be undertaken prior to construction to quantify the contamination status of the underlying soils and groundwater.
* We note that Appendices B to F are missing from the report that we are in receipt of, we are therefore unable to provide full comments and confirm we are satisfied with the preliminary risk assessment until we are in receipt of the full report.
* Given the above we will have comments to make on the proposed site investigation scheme, we won’t however be in a position to comment on any such scheme until we have reviewed, and are happy with, the Phase 1 Desk Study Report – we request therefore that a full copy of this report is made available to Environmental Health.

Other Comments:

West Sussex County Council Highways:

Given the scale of the development proposed, all highways and transport related matters would be assessed as part of a transport assessment, the scope of which would need to be agreed with WSCC Highways. The TA will then subsequently feed into the EIA. For the purposes of the EIA scoping note, WSCC Highways would have no comments to make.

West Sussex County Council Lead Flood Authority:

A robust Flood Risk Assessment and Drainage Strategy will be required for this application and must consider sustainable drainage techniques (permeable paving, swales, attenuation basins with a restricted outfall to the watercourse) that could be used to control the surface water from this development. In this spirit of SuDS implementation, and in line with policy detailed in the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water, betterment for surface water systems on the new developments should be sought. This could include retention at source through rain gardens, permeable paving, swales or bioretention systems. SuDS landscaping significantly improves the local green infrastructure provision and biodiversity impact of the developments whilst also having surface water benefits.

This application will be subject to review by the District Council Drainage Engineer to identify site specific land use considerations that may affect surface water management and for a technical review of the drainage systems proposed. The disposal of surface water via infiltration/soakaway should be shown to have been investigated through an appropriate assessment in consultation with the District Drainage Engineer.

All works to be undertaken in accordance with the LPA agreed detailed surface water drainage

designs and calculations for the site, based on sustainable drainage principles. The maintenance and management of the SuDS system should be set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved designs.

Please note that Schedule 3 of the Flood and Water Management Act 2010 has not yet been implemented and WSCC does not currently expect to act as the SuDS Approval Body (SAB) in

this matter.

Southern Water:

* Southern Water’s records show that there is public foul sewer, rising main and water main within the proposed development site.
* No development or tree planting should be carried out within 3 metres of the external edge of the 150 mm public foul sewer and 300 mm public foul rising main without consent from Southern Water.
* No development, excavation, mounding or tree planting should be carried out within 6 metres of the public water main 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.
* Land uses such as general hard standing that may be subject to oil/petrol spillages should be drained by means of appropriate oil trap gullies or petrol/oil interceptors.

West Sussex County Council Minerals and Waste:

* The applicant is proposing development within the minerals safeguarding area for Building Stone (Horsham Stone Formation) and Brick Clay (Weald Clay Formation). The proposed development also falls within 250m of Horsham Household Waste Recycling Centre (an existing permitted waste site).
* At this stage, we would emphasize the importance for the proposal to demonstrate compliance with both Policies W2 (WSCC Waste Local Plan, 2014) and M9 (Joint Minerals Local Plan, 2018). Respectively, the applicant should demonstrate that the proposed development would be compatible with the existing safeguarded waste operators around the site as to ensure their continued operation is not prevented or prejudiced, and that the applicant explores the potential for prior extraction of the safeguarded mineral resource where economically practicable and environmentally feasible. The applicant should demonstrate this through the submission of a Mineral Resource Assessment and Waste Infrastructure Assessment should a planning application be made; using the guidance to assist in demonstrating adherence to these policies where necessary.
* With regard to the EIA, the MWPA would offer no objection at this stage subject to the above considerations being met and the LPA being satisfied that the proposed development could be delivered without significant Environmental Impacts. Where significant impacts are anticipated, the LPA should be satisfied that suitable mitigative measures can be implemented to ensure sustainable use of the land.

HDC Air Quality Officer:

* The Air Quality and Emissions Mitigation Guidance for Sussex (2021) would be applicable to this proposal. The proposed project requires an air quality assessment and an emissions mitigation assessment.

HDC Environmental Health:

* Given the close proximity of the heavily trafficked A24 and B2237 to the western part of the site, any full or outline application for residential development on this site will need to be supported by a noise impact assessment, undertaken by a suitably competent and experienced environmental consultant.
* Given the close proximity of residential properties to the application site a construction environmental management plan (CEMP) will also need to be produced for the site. We would welcome this information in support of the application, we would however be happy to request this information through a suitably worded condition.

Gatwick Airport:

* It is understood from the EIA Scoping Report under ‘Aviation’ on page 20 that the maximum height of the proposed development is not expected to exceed more than 3 storeys. If this is the case, then we have no concerns with regard to the building heights from an aerodrome safeguarding perspective.
* With regard to any landscaping and environmental enhancements planned for the site. We would be grateful if we could be consulted on any new water bodies or enhancements to the existing water bodies.

End