



**LAND NORTH-WEST OF
SOUTHWATER, HORSHAM**

**ENVIRONMENTAL STATEMENT VOLUME
II, APPENDIX 5.1: EIA SCOPING OPINION
RESPONSES**

FEBRUARY 2026



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5.1 APPENDIX 5.1 LAND NORTH-WEST OF SOUTHWATER – SCOPING OPINION CONSULTEE COMMENTS AND RESPONSES

Table 5-1 - Scoping Opinion Consultee Comments and Responses

Consultee	Comment	How will this be taken into consideration in the ES
Horsham District Council (HDC)	<p><u>Scope of Assessment:</u> HDC recommends that in order to assist the decision-making process, the Applicant uses tables:</p> <ul style="list-style-type: none"> • to demonstrate how the assessment has taken account of this Opinion; • to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects; • to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (e.g. a planning condition); • to describe any remedial measures that are identified as being necessary following monitoring; and • to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES. 	<p>Noted. The ES has used tables (as part of this appendix) to outline how the assessment has taken into account the Scoping Opinion Responses.</p> <p>The ES chapters also outline the residual effects following mitigation, any monitoring measures (including securing mechanism), and remedial measures.</p>
	<p><u>Chapter 1: Introduction</u> It would be useful if the Scoping Report had an executive summary</p>	<p>Noted. Following submission of the scoping report, the ES will have a Non-Technical Summary which will summarise the wider ES document and technical assessments' findings.</p>
	<p><u>Chapter 2: Description of the Proposed Development</u> The ES should provide a full description of the nature and scope of these activities, including the types of activity, their frequency, and how works will be carried out for all elements of the Proposed Development.</p>	<p>Information on the description of the Proposed Development is included in Chapter 3: Description of the Proposed Development. Detail on construction proposals is included in Section 3.5. The construction of the Proposed Development will be undertaken in phases, across a</p>

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	<p>This includes the construction phase, not just operational phase.</p> <p>2.1.2 For clarity, please align with the language used by HDC in its literature; Policy HA3 as a 'draft allocation', and the Regulation 19 plan as the 'Emerging Local Plan'.</p> <p>2.1.3 The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Reference to water neutrality to be updated. Refer to HDC website https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p> <p>2.1.6 Typo correction: 'advice' not 'advise'</p> <p>2.2 Reference should be made to:</p> <ul style="list-style-type: none"> • Southwater Country Park and Lintot Square (both important socio-economic aspects) • minerals resource safeguarding areas applying to the site (re: The WSCC Minerals Local Plan). <p>This constraint is not identified</p> <p>2.3.10 Buildings to be demolished are required to be confirmed. This is far too vague and unclear to what it relates too. Flesh out for clarity.</p> <p>2.4 Embedded Environmental Design Measures Table 2.1 presents the embedded environmental design measures for the Proposed Development. <i>E.g. Natural and semi-natural habitats, including hedgerows, trees and ponds, will be retained and protected wherever possible.</i></p> <p>The EIA should focus on mitigation and compensation to be provided, and this needs to both be clearly presented in the ES and measurable, particularly if it is relied on for the purposes of presenting the residual impacts within the assessment.</p>	<p>construction period of 13 years. Details on the operation phase across the Site is detailed within chapters 6-15 of the ES.</p> <p>2.1.2 Thank you for the clarification. It will be ensured that the ES will align with HDC's terminology, referring to Policy HA3 as a 'draft allocation' and the Regulation 19 Local Plan as the 'Emerging Local Plan'.</p> <p>2.1.3 The Upper Arun SSSI has now been included within the technical assessment of Chapter 8: Ecology. It has also been noted in the Energy Statement that Natural England had withdrawn its Water Neutrality Position Statement and that the Applicant will comply with the appropriate guidance and regulations when submitting the application with regards to this matter.</p> <p>2.1.6 Noted and amended where mentioned in the ES.</p> <p>2.2 Southwater Country Park has been considered as part of the Open Space assessment in Chapter 11 Socio-economics.</p> <p>Lintot Square (and Southwater Country Park) have been considered within the Design and Access Statement, with regards to the Proposed Development's proposed new facilities will complement and support the existing Lintot Square, not compete with it. Walking and cycling provisions have been included in the design to connect Lintot Square and other areas within Southwater. Lintot Square is also considered within the Retail Assessment.</p> <p>The Minerals Resource Safeguarding Area has been referenced within the updated Preliminary Mineral Resource Assessment in line with the WSCC Minerals Local Plan.</p> <p>2.3.10 Additional details on the buildings to be demolished have been outlined in the Design and Access Statement and Chapter 3 of the ES. A plan (KPK-A019-0013-Buildings Proposed to be Demolished) will also be submitted with the application providing a visual of the buildings planned to be demolished.</p>

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	<p>Many of those measures are in the form of management or mitigation plans or other documents. Whilst this approach is generally welcomed and the principles of how the measures listed would likely be beneficial in terms of environmental effects understood, limited detail is provided as to the content of the management and mitigation plans that are listed, and many of the matters included are suffixed by statements such as “where possible” or “as far as practicable”. It is therefore difficult for HDC to gain confidence as to the likely efficacy of such plans at this stage. The ES should therefore set out these plans (or the reliance placed on them) in sufficient detail so as to understand the significance of residual effects. This should also include identification of any monitoring and remedial actions (if relevant) in the event that predicted residual effects differ to actual monitored outcomes.</p> <p>With that in mind, HDC advocates far greater precision and detail of clarity to the precise measures being identified in Table 2-1. It is appreciated that table 2-1 is summary, but at minimum, it needs to cross reference later chapters in the ES where these measures are set out in greater detail for ease of reference, but more significantly, HDC’s strong expectation is for further refinement of each of these measures be provided, in order to present measurable certainty to delivery of outcomes.</p> <p>For example, HDC requests the exemplified embedded measure includes where the Proposed Development will result in the disturbance of hedgerows, trees, and ponds their removal will be kept to a practical minimum with replacements being provided and fenced off during the first planting season following construction. The substitution of ‘wherever possible’ with a more robust commitment should be also considered.</p>	<p>2.4 The design of the Proposed Development has evolved to reduce environmental effects as much as possible (see Chapter 3: Description of the Proposed Development). Where further mitigation measures are required, these are highlighted as additional mitigation measures and are included in each chapter, where they are required. As the planning application is outline at this stage, some details will be confirmed as the design progresses hence the use of ‘where possible’ or ‘as far as practicable’.</p> <p>Embedded measures as well as additional avoidance and mitigation measures are outlined clearly in Chapter 8: Ecology, for each of the key ecological receptors across the Site, covering both Construction and Operation.</p> <p>The Illustrative Masterplan and Chapter 8: Ecology outline the expected disturbance to these receptors and how this will be kept to a minimum. Furthermore, mitigation and enhancement measures are also covered.</p>
	<p><u>Chapter 5: Approach to EIA</u></p> <p><u>Forecasting Methods of Evidence</u></p> <p>The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.</p>	<p><u>Forecasting Methods of Evidence</u></p> <p>Details on the surveys undertaken are included in each technical chapter (chapters 6-15). Where survey reports exist (for example in support of Chapter 8: Ecology), further detail on surveys undertaken can be found in each technical appendix.</p>



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	<p>HDC expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.</p> <p>The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.</p> <p>The ES should be clear as to the potential construction programme options where the installation of all onshore cables may not occur in a single operation.</p> <p><u>Residues and Emissions</u></p> <p>The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions.</p> <p>Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.</p> <p><i>3.2.4 The Public Participation Directive...provides opportunities for the public to be involved in the consenting process for certain activities, through access to information, justice and consultation on key documents.</i></p> <p>HDC would like it understood how local communities within the Scoping Boundary have been consulted upon to help provide local input.</p> <p>3.3.1 “Study areas will be defined for each individual environmental factor”. It would be useful to show the relevant Scoping Boundary (study areas) on a map as an Appendix.</p> <p>3.6 Approach to Mitigation – the identification of mitigation measures follows the principles of avoidance where possible, reduction where avoidance cannot be achieved, or compensation where reduction cannot be achieved or would not achieve practicable levels of mitigation.</p>	<p>Chapter 5: Approach to EIA sets out the overarching methodology for the assessment. Where there is deviation from this approach, detail is included in each individual technical chapter.</p> <p>Each chapter within the ES contains a section detailing any difficulties and uncertainties encountered when authoring the chapter and any associated assessments.</p> <p>It is acknowledged that there are 11kV high voltage (HV) networks across the Site. This includes residential areas, the primary school site, secondary school site and the employment land. HV cables will be diverted as necessary to enable development. There are also some low voltage (LV) overhead cables on the Site near the dairy farm. These LV cables will be disconnected to enable development. This is covered in the Utilities Statement which forms part of the application submission.</p> <p><u>Residues and Emissions</u></p> <p>Individual technical chapters detail effects of expected residues and emissions on water (Chapter 13), air (Chapter 6), soil and subsoil pollution (Chapter 14), noise and vibration (Chapter 10). A Lighting Strategy will be produced as part of a planning condition, with further detail provided in Chapter 3. Waste considerations are highlighted in the Preliminary Ground Appraisal Report. Heat and radiation are briefly assessed in the Greenhouse Gas chapter (Chapter 15) and CRRR but these are not deemed material to, or deemed a risk to or from, the Proposed Development.</p> <p>3.2.4 A Statement of Community Involvement has been prepared as part of this Planning Application which details the Community Consultation Process undertaken for the application.</p> <p>3.3.1 For the Environmental Statement, a series of figures have been produced showing the Site Boundary, see Figure 1.1, 1.2 and 1.3 of Chapter 1: Introduction. For each technical chapter, figures have been produced showing sensitive receptors and specified buffer zones, the locations of these are signposted in each technical chapter.</p>

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	<p>The EIA should focus on mitigation and compensation to be provided, and this needs to both be clearly presented in the ES and measurable, particularly if it is relied on for the purposes of presenting the residual impacts within the assessment.</p> <p>The ES should clearly demonstrate how the Applicant has had regard to the mitigation hierarchy, for example by considering the avoidance of key receptors. In this regard, it is acknowledged it is set out the Applicant's proposed approach to setting out avoidance, best practice and design commitments.</p> <p>As previously identified, HDC advocates greater precision and detail of clarity to the precise measures identified. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific planning conditions or other legally binding agreements.</p> <p>The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.</p> <p><i>3.7.3 The assessments of likely significant effects for each environmental factor will take into account both the construction and operational stages of the Proposed Development as a whole, however, given the nature of the Proposed Development, the assessments will not consider specific build out stages of each stage.</i></p> <p>As the construction is likely to be phased over several years, this potential scenario will need to be assessed within the EIA.</p>	<p>3.6 The Approach to Mitigation is addressed in Chapter 5: Approach to EIA, providing detail on how significant effects can be reduced through mitigation and monitoring.</p> <p>Each technical chapter outlines the proposed mitigation and monitoring requirements (where required) for the Proposed Development as part of their assessments and provides a summary at the end of each chapter. This is also addressed in Chapter 5: Approach to EIA.</p> <p>3.7.3 A summary of the likely significant effects is addressed within all technical chapters and summarised in Chapter 17: Summary of Effects and Mitigation Measures.</p>
	<p><u>Chapter 4. Environmental Factors Scoped Out</u></p> <p>With respect to the areas which are stated do not require their own chapter:</p> <p><u>Daylight, Sunlight and Overshadowing</u> – HDC agree that this environmental factor would not need to be considered in the ES.</p>	<p><u>Daylight, Sunlight and Overshadowing:</u> The Applicant notes this response.</p> <p><u>Human Health:</u> A Rapid Health Impact Assessment is submitted as an appendix to Chapter 11: Socio-economics,</p>

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	<p><u>Human Health</u> – HDC agree this does not need its own chapter, provided a clear and robust assessment for all relevant receptors is included in the relevant topic technical chapter. This should build upon best practice and use the assessment of other relevant chapters (such as noise, traffic, air, and water) to describe how these factors may lead to health outcomes of the local population.</p> <p><u>Arboriculture</u> – HDC accept this does not need its own chapter, provided a clear and robust assessment for all relevant receptors is included in the relevant topic technical chapter. This should build upon best practice and use the assessment of other relevant chapters (such as landscape, ecology) to describe how these factors may lead to tree retention and appropriate mitigation measures (new planting), and a schedule of all surveyed Ancient/Veteran/ notable/ protected trees is included in the ES.</p> <p><u>Waste</u> – HDC accept this does not need its own chapter provided it is seen that there is reference to key principles for how waste will be managed, along with how will adopt good construction and management practices to ensure waste is minimised as far as possible, in the relevant topic technical chapter. HDC would expect to see reference that the northern part of the application site is within the consultation buffer zone for existing waste infrastructure (Hop Oast/Horsham Household Waste Recycling Site). The applicant should demonstrate that the proposal should not prevent or prejudice the continued operations of the safeguarded waste site, as per Policy W2 of the West Sussex Waste Local Plan 2014. The applicant should demonstrate mitigation by way of control doc - a Waste Infrastructure Safeguarding Assessment as appropriate.</p> <p><u>Major accidents and disasters</u> – HDC agree this does not need its own chapter and should be assessed in relevant topic chapters. It should assess the likely risks to the project in relation to potential areas of vulnerability.</p> <p><u>Artificial Lighting</u> - HDC accept this does not need its own chapter, as long as a clear and robust assessment for all relevant receptors is included in the relevant topic technical chapter, particularly relating to ecology. HDC would wish to see construction phase lighting directed downward and not pointed in the direction of any close by receptors. Lighting should be turned off and retracted when not</p>	<p><u>Arboriculture</u>: An Arboriculture Impact Assessment is submitted as an appendix to Chapter 8: Ecology, and provides details on tree retention, mitigation measures and all surveyed Ancient/Veteran/notable/protected trees.</p> <p><u>Waste</u>: Waste considerations are highlighted in the Preliminary Ground Appraisal Report. A brief summary is also provided in Chapter 3: Description of the Proposed Development.</p> <p>It is set out within the Transport Assessment that there would be no detrimental impact on the operation of the Hop Oast/Horsham HWRC site because of the anticipated acceptable impacts on the highway network including the Hop Oast junction. If deemed required, a Waste Infrastructure Safeguarding Assessment may be produced at reserved matters stage.</p> <p><u>Major Accidents and Disasters (MA&D)</u>: MA&D has briefly been included as part of Chapter 11: Socio-Economics, and as part of the Transport Assessment with regards to vulnerable users and areas of vulnerability.</p> <p><u>Artificial Lighting</u>: Aspects relating to artificial lighting are providing in Chapter 8: Ecology, and the Design and Access Statement. Low-level sensitive lighting will be provided to support legibility and safety where appropriate, and lighting design will comply with BS 5489-1 (2013) Code of Practice for the Design of Road Lighting, BS 8300 (2018) Design of an Accessible and Inclusive Built Environment, and Part L Building Regulations (2014) LENI method. Chapter 3: Description of the Proposed Development provides an overview of the proposed Lighting Strategy which will be produced during detailed design.</p> <p><u>Heat and Radiation</u>: Energy efficiency measures pertaining to level of heat efficiency and the avoidance of heat loss through buildings is described in Chapter 3: Description of the Proposed Development,</p>

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	<p>needed. Passive infrared sensor (PIR) activated lighting should be installed where safe to do so.</p> <p>HDC would want to see reference to this in the ES. With regards to the operational lighting requirements, good lighting practice in accordance with the recommendations of the Institute of Lighting Professionals (ILP) and Society for Light and Lighting (CIBSE) as well as the Bat Conservation Trust should be referenced.</p> <p><u>Heat and Radiation</u> - HDC agrees this does not need its own chapter and should be assessed in relevant topic chapters.</p> <p><i>4.9.1 It is suggested that Archaeology could be scoped out for the EIA as archaeological interest can be managed via standard planning control and secured and mitigated by standard planning conditions on any future grant of planning consent.</i></p> <p>HDC disagree.</p> <p>The applicants have included a chapter on Cultural Heritage. The report confirms that cultural Heritage will be included for assessment in the forthcoming EIA but that it is proposed that archaeology will be scoped out.</p> <p>The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p> <p>The site is large, and the majority of the area has not been subject to previous archaeological investigation although the southern part of the site is within an Archaeological Notification Area DWS8545 which includes evidence from a magnetic gradiometer survey that identified a number of probable archaeological features including a number of enclosures and pit alignments with some features possibly related to former kilns or hearths.</p> <p>The scoping report considers that the site has a moderate potential for deposits of earlier prehistoric, later prehistoric (Iron Age) and Romano-British date within the Site, and a low to moderate potential for deposits dating to the Anglo-Saxon</p>	<p>Chapter 15: Greenhouse Gases, and in the Energy Statement. Radiation from UV rays is described in the CRRR and their potential impacts upon material degradation. Heat and radiation are otherwise not included within the ES.</p> <p>4.9.1 Noted. Archaeology has now been scoped into the assessment and is considered within Chapter 7: Built Heritage and Archaeology. Further consultation with HDC, Historic England and Surrey County Council has taken place and is outlined in the chapter. The Site has been subject to several phases of non-intrusive archaeological geophysical survey which robustly covers the Site area. The cumulative results of these have not indicated potential areas of high archaeological sensitivity.</p> <p>Details on geophysical surveys are included within Chapter 7: Built Heritage and Archaeology and the supporting appendices. A new search for a 1km search area has been ordered and interrogated for the Archaeological Desk-Based Assessment. The full reports on the geophysical surveys are included within Chapter 7: Built Heritage and Archaeology and the supporting appendices, Appendices 1 to 3 of the Archaeological and Historic Landscape report.</p>

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	<p>and Medieval periods, but the true nature of the archaeological resource and its significance remains to be determined and so further assessment and investigations will be required.</p> <p>IHDC considers that it would be reasonable to carry out these investigations, which should include a geophysical survey of the site which builds on the work carried out previously to the south, as part of the EIA assessment work and that archaeology should be included within the proposed Cultural Heritage Chapter so that an integrated and holistic view of the historic environment can be provided and the significance of non-designated heritage assets assessed.</p> <p>This approach would accord with the advice given by Historic England in their consultation response that <i>'the assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development'</i></p>	
<p>HDC Planning Department</p>	<p><u>Chapter 5: Air Quality</u></p> <p>Mitigation measures should be informed by, and HDC expects reference to 'Air quality and emissions mitigation guidance for Sussex' (2019): http://www.sussexair.net/Reports/Sussex_AQ_Guidance_2019.pdf</p> <p>HDC have recently published the 2025 Annual Status Report on our Air Quality webpage.</p> <p><u>Air Quality Modelling</u>: Major applications should consider supplementing local authority monitoring with own monitoring - which would help to increase model certainty and confidence in the results.</p> <p>Liaise with the planning department for information on any other schemes that should be included in a cumulative impacts' scenario.</p> <p>The assessment should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in</p>	<p>The air quality assessment, presented in Chapter 6: Air Quality has referred to the Air Quality and Emissions Mitigation Guidance for Sussex, updated 2021.</p> <p><u>Air Quality Modelling</u>:</p> <p>Chapter 6: Air Quality sets out all necessary details of methodology, assumptions (including traffic data, emissions data etc), limitations and uncertainties. Where traffic impacts have been determined by dispersion modelling (see Appendix 6.3: Dispersion Modelling Methodology), uncertainty is considered with reference to statistical methods in Defra Local Air Quality Management technical guidance LAQM.TG(22).</p> <p>The air quality assessment of impacts from changes in traffic emissions accounts for cumulative development as far as these assumptions are included within the underpinning traffic data. The traffic data is</p>



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	<p>the ES. Please provide full statistical analyses to give full picture of the model performance.</p> <p>As the development is being built, other receptors will be created, these should be identified and considered in the modelled scenarios.</p> <p><u>Mitigation:</u> The Sussex Air Quality Guidance takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost.</p> <p>Regarding the measures to be put forward in the air quality mitigation plan HDC would request that the applicant avoids duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, HDC would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, HDC would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. Instead, HDC would highly recommend contribution to measures included in our Annual Status Report such as Walking and Cycling</p> <p>Measures to promote Travel alternatives in line with</p> <ol style="list-style-type: none"> West Sussex Active Travel Strategy Horsham's Local Cycling and Walking Infrastructure Plan Horsham District Council Infrastructure Delivery Plan <p><u>Construction:</u> As the development is being built, other receptors will be created, these should be identified and considered in the construction dust management plan.</p> <p>Follow the guidance:</p>	<p>presented in Appendix 6-2 of Chapter 6: Air Quality, with further details provided in Chapter 12: Traffic and Transport.</p> <p>Proposed Receptors are considered within the construction and operational phase assessment as outlined in Section 6.5 and Section 6.6 of Chapter 6: Air Quality. The assessment is to be undertaken with regard to:</p> <ul style="list-style-type: none"> SUSSEX-air's Air Quality and Emissions Mitigation Guidance (2021); The Institute of Air Quality Management (IAQM) guidance; Defra interim planning guidance on PM2.5 targets; and Natural England: Air Pollution and Development - Advice for Local Authorities (on air pollution) <p>Details of human receptors together with background pollutant levels are provided in Appendix 6.4: Modelling Human Receptors and Background Pollutant Concentrations.</p> <p><u>Mitigation:</u> The air quality chapter sets out proportionate mitigation to address non-negligible adverse impacts in Section 6.6.</p> <p>Damage cost assessment in line with the SUSSEX-air's Air Quality and Emissions Mitigation Guidance is presented in Appendix 6.5: Damage Cost Calculations.</p> <p>The Transport Assessment (Appendix 12.1) refers to the West Sussex Active Travel Strategy, Horsham's Local Cycling and Walking Infrastructure Plan. The Proposed Development is required to provide a comprehensive Transport Strategy which includes a walking, cycling and public transport strategy and providing improvements to these travel alternatives in line with the above strategies.</p> <p><u>Construction:</u> The ES air quality assessment for construction dust is based on these IAQM and Sussex Air guidance documents and considers the potential impacts at new receptors that would be</p>

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	<p>a. Sussex Air (2021) Air Quality and Emissions Mitigation Guidance</p> <p>b. IAQM Guidance on Monitoring in the Vicinity of Demolition and Construction Sites</p> <p>c. IAQM Guidance on the assessment of dust from demolition and construction</p> <p><u>Fine Particles:</u> An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.</p> <p>How has exposure to PM2.5 been considered when selecting the development site? Applicants are advised to consider the following in their application:</p> <p>d. Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,</p> <p>e. Site proximity to pollution sources and the impact of these on users of the development,</p> <p>f. Exposure and emissions during both construction and in-use.</p> <p>12. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:</p> <p>g. Site layout,</p> <p>h. The development's design,</p> <p>i. Technology used in the construction or installed for use in the development,</p> <p>j. Construction and future use of the development.</p>	<p>introduced by the Proposed Development. Mitigation measures include water-assisted dust sweepers, well designed layouts to locate dust causing activities away from sensitive receptors, and a Dust Management Plan, which is to be secured by a planning condition.</p> <p><u>Fine Particles:</u> The air quality chapter sets out proportionate mitigation to address non-negligible adverse impacts and reasonably minimise the risk of exposure of new occupants to PM_{2.5} concentrations where the relevant standard is predicted to be exceeded.</p> <p><u>Odours:</u> Assessment of odours has been scoped out as outlined in Table 6-2 of Chapter 6: Air Quality.</p> <p>The chapter addresses the potential of odour encroachment as far as reasonably practicable at this stage of the design: The WWTW is over 1km to the north-east of any new sensitive receptor within the Site. With reference to IAQM guidance on odour, considering a south-westerly prevailing wind and the separation distance there is likely to be a low risk of odour from the WWTW affecting amenity at the Site.</p> <p>Should further discussions be required, the Applicant will hold these with the operator of Horsham WWTW.</p> <p>If deemed still required following discussions, an Odour Assessment may be developed to a specification agreed with SW Odour at reserved matters stage or prior to construction of the Proposed Development.</p> <p>d), e) & f) Throughout the previous allocation review, the level of traffic flow along Worthing Road (South of Hop Oast Roundabout) in proximity to the Site was a key consideration in determining the access road in terms of traffic volumes and air quality.</p> <p>The Traffic and Transport chapter (Chapter 12) outlines the value of the sensitivity of the highway link (high, medium, low, negligible) based on the presence and proximity of sensitive receptors such as schools, hospitals, nurseries, nursing homes, high concentrations of residential dwelling and facilities and amenities, areas with high tourist footfall,</p>

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	<p><u>Odours:</u> The development will be introducing new receptors close to Horsham waste water treatment works (WWTW), there is therefore the potential for those new occupants to be affected by odours. It is advisable that that developer hold discussions with the operator of Horsham WWTW. Due to the potential odour nuisance from the nearby WWTW, no sensitive development should be located within the 1.5 OdU odour contour. An Odour Assessment will need to be carried out to a specification that will need to be agreed in advance with SW Odour.</p>	<p>significant pedestrian / cycle desire lines to the highway link and aligning with air quality through both construction and operation.</p> <p>12. g) h), i) j): Chapter 6: Air Quality has considered these areas in further detail.</p>
	<p><u>Chapter 6: Cultural Heritage</u></p> <p><u>Table 6.1</u> Should identify in more detail how each asset-built heritage assets, historic landscape features and below-ground archaeological remains are likely to be impacted by the Proposed Development.</p> <p>Development on this site has the potential to impact upon the setting of several designated heritage assets. The report has identified 24 listed buildings within the 500m study radius, one of which is Grade II* (Great House Farmhouse) and 23 of which are Grade II. There are additionally two Grade II* listed buildings sitting just outside of the Study Area to the northwest at Christ's Hospital School, which have been included as part of the baseline HDC appreciates that some of these heritage assets have been scoped out from the ES chapter based on their distance from the site, the nature of the intervening townscape/landscape, and the varying degrees of contribution given by the setting to their significance.</p> <p>The Scoping Report shows that the designated heritage assets within the near vicinity of the proposed development have been identified:</p> <p>a) Great House Farmhouse. It is acknowledged that the setting of Great House Farmhouse is likely to be altered as a result of the proposed development and then concluded that with appropriate mitigation measures in places, the effects can be reduced and minimised and would not be regarded as significant in EIA terms.</p> <p>However, as Historic England point out one of the reasons for designation of the Farmhouse at Grade II* is the historic interest of the site as derived from its</p>	<p><u>Table 6.1</u></p> <p>All identified assets of cultural heritage interest are described in Chapter 7: Cultural Heritage and Archaeology and illustrated on Figures 1 and 2 of the chapter. Details on how each built heritage asset, historic landscape feature and known below-ground archaeological feature of archaeological interest (including those named by HDC) is likely to be impacted by the Proposed Development is detailed in the ES Chapter</p> <p>The design of the Proposed Development has evolved to identify built heritage effects and then to avoid, reduce or offset them as much as possible, primarily by design changes through consultation strategies (see Chapter 3: Description of the Proposed Development, and the Design and Access Statement). Where further mitigation measures for Built Heritage or Archaeology are required, these are highlighted as additional mitigation measures and are included in Chapter 7: Cultural Heritage and Archaeology. As the planning application is outline at this stage, some mitigation details especially with regard to archaeological impact will be confirmed as the design progresses.</p> <p>a) The assessment for Great House Farmhouse is presented in Chapter 7: Cultural Heritage and Archaeology, with minor adverse (not-significant) and minor beneficial (not significant) effects identified during construction anticipated. The design changes to the Proposed Development since 2022 are recognised by Historic England to have reduced these effects to</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>location within a relict medieval landscape associated with Sele Priory. The open countryside and its historic field patterns surrounding the heritage asset make a positive contribution to the appreciation of the historic farmstead, and thus to the significance of the listed building, not simply by allowing the historical use of the building to be visually related to the land, but by providing a unified visual experience of open ground all round it. It also helps illustrate the wider historic settlement pattern across this part of the Low Weald of dispersed farmsteads with intervening countryside in between.</p> <p>Therefore, Historic England's position is there is potential for impacts to be significant, but appropriate mitigation may help to reduce some of the harmful impacts. In this respect, HDC note's Historic England strong support of the proposed mitigation to explore opportunities to reveal the significance of Great House Farm through restoration of the listed building, as noted previously by Historic England - 'restoration of the front elevation of the farmhouse and its repair would be a clear enhancement and would deliver heritage benefits that could help to offset the harm to some degree'.</p> <p>This is not currently identified as a mitigation measure in the Scoping Report.</p> <p>b) Other designated heritage assets, undesignated heritage assets and undesignated Archaeology</p> <p>Of particular significance are a group of historic barns associated with Great House Farmhouse, included within the site. These structures, while forming part of the setting of the designated asset, contribute to our ability to appreciate the original function of the farmstead, making an important contribution to the character and local distinctiveness of the area and its sense of place.</p> <p>The majority of the Listed Buildings (Grade II), Parish Heritage Assets, undesignated archaeology and other built heritage aspects also need to be examined within the heritage baseline assessment and ES chapter. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.</p>	<p>within the lower range of less than substantial harm, as confirmed by Historic England by letter dated 8th December 2025. A range of mitigation by design is proposed within the chapter.</p> <p>The Proposed Development aims to deliver a heritage-led design for the barns group as advised by the Council and Historic England by the removal of modern industrial elements, by sensitive restoration and by finding new, authentic uses especially for Barns A-C. This is however dependant on assessment of the current state of the barns and whether they can be restored as they do appear to be in places in an advanced state of dilapidation. The design of the Barns area will be informed by Historic England's Farmstead Guidance.</p> <p>The ES chapter acknowledges that the setting of Great House Farmhouse is likely to be altered as a result of the Proposed Development, and conclude that with appropriate mitigation measures the harm could be reduced to an acceptable level in places, where the remaining effects would not be regarded as significant in EIA terms, if balanced by the delivery of public benefits.</p> <p>b) All the Listed Buildings (Grade II*, Grade II), Parish Heritage Assets, undesignated heritage assets and archaeology and other built heritage aspects including the group of barns associated with Great House Farmhouse, have been examined within the heritage baseline assessment and ES chapter. In line with the advice in the National Planning Policy Framework (NPPF), the Environmental Statement thus contains a thorough assessment of the likely effects which the Proposed Development might have upon those elements which contribute to the significance of these assets.</p> <p><u>3. Setting Assessment</u></p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>3. Setting assessment</p> <p>Given the scale of the proposed development and the range of heritage assets in the area, the development in this location has the potential to be visible from these assets, and as a result may affect their significance.</p> <p>We recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets.</p> <p>Techniques such as photomontages, computer generated views analysis imagery, and verified views with wireframes are a useful part of understanding visual impacts. Analysis of key views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be important. Setting may also form a part of the wider conceptual significance of a heritage asset and how it is experienced, and the ES must therefore additionally reflect these more nuanced aspects of setting in order to fully take account of impact</p> <p>An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it.</p> <p>The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area.</p> <p>The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.</p> <p><u>Archaeology</u></p>	<p>The setting of all the designated heritage assets and factors such as visibility is discussed throughout the Built Heritage Assessment (Appendix 7.1) and within the Landscape and Visual Assessment.</p> <p>An integrated approach to assessment has taken place and landscape character and the 'sense of place', which gives a heritage asset its 'special' sometimes intangible heritage value has been carefully considered. The assessment has also taken account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area. The assessment also considers the likelihood of alterations to drainage and ground water patterns that might lead to <i>in situ hydrological changes that might lead to decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.</i></p> <p><u>Archaeology:</u></p> <p>Archaeology has now been scoped into the EIA and included for assessment within Chapter 7: Cultural Heritage and Archaeology.</p> <p>The Archaeological Notification Area DWS8545 has been accounted for within the chapter. The chapter provides an assessment into the archaeological assets ranging from Iron Age to Anglo-Saxon periods.</p> <p><u>Enhancement:</u></p> <p>Enhancements with regard to heritage assets would be brought about by the introduction of interpretation materials within the Site. Enhancement will be brought about for Great House Farmhouse by the creation of new views, resulting from demolition of large scale, modern barns within its close setting. There would be some enhancement arising for the barns at Great House Farmhouse, introducing a new use which would secure future repairs and maintenance for the historic buildings.</p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p>The applicants have included a chapter on Cultural Heritage by WSP within the EIA Scoping Opinion Request Report. The report confirms that cultural Heritage will be included for assessment in the forthcoming EIA but that it is proposed that archaeology will be scoped out.</p> <p>The site is large, and the majority of the area has not been subject to previous archaeological investigation although the southern part of the site is within an Archaeological Notification Area DWS8545 which includes evidence from a magnetic gradiometer survey that identified a number of probable archaeological features including a number of enclosures and pit alignments with some features possibly related to former kilns or hearths.</p> <p>The scoping report considers that the site has a moderate potential for deposits of earlier prehistoric, later prehistoric (Iron Age) and Romano-British date within the Site, and a low to moderate potential for deposits dating to the Anglo-Saxon and Medieval periods, but the true nature of the archaeological resource and its significance remains to be determined and so further assessment and investigations will be required.</p> <p>HDC considers that it would be reasonable to carry out these investigations, which should include a geophysical survey of the site which builds on the work carried out previously to the south, as part of the EIA assessment work and that archaeology should be included within the proposed Cultural Heritage Chapter so that an integrated and holistic view of the historic environment can be provided and the significance of non-designated heritage assets assessed.</p> <p>This approach would accord with the advice given by Historic England in their consultation response that 'the assessment would include production of an updated desk-based evaluation and a geophysical survey to establish the scope and timetable for further archaeological fieldwork in consultation with West Sussex County Council Archaeologist. These investigations should be produced in advance of the EIA in order to inform both the assessment and the emerging masterplan for the proposed development'.</p> <p>Enhancement There will be a requirement through planning policy (NPPF and local policy) to</p>	

Consultee	Comment	How will this be taken into consideration in the ES
	<p>avoid and minimise harm to heritage assets, and there will be a presumption in favour of conserving designated assets. By following planning policy and guidance we would also additionally expect the project to be creative in how it might offer opportunities for their enhancement, and how the project might deliver public (heritage) benefit.</p>	
	<p><u>Chapter 7: Ecology</u></p> <p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun. <p>The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.</p> <p>Therefore, landscaping and biodiversity mitigation / compensation / enhancement / gain should all be informed by the Local Nature Recovery Strategy (now available in draft form) for West Sussex with particular attention to enabling residents to take an active role in nature recovery - i.e. mindful of LNRS directions for urban recovery as well as blending with surrounding countryside. There are also local level initiatives such as Wilder Horsham and Weald to Waves that should be referenced.</p> <p>7.7.1 New habitats should be tailored to Baseline Conditions. Note the southern part of the site, between Courtland Wood, Kirsty's Wood and the Grade II* Great House Farm, has been identified in the draft Nature Recovery Network map 2021 as an opportunity area with very high habitat potential. These sites are high priority to target with management advice because of the significant contribution they could make to Nature Recovery but also because of the connectivity they provide between other sites. Ideally as much of this area as</p>	<p><u>Upper Arun</u></p> <p>Chapter 8: Ecology considers the impacts during both the construction and operational phases of the Proposed Development on Upper Arun SSSI. It also sets out mitigation proposals such as the retention and enhancement of wetland features within and adjacent to the Site.</p> <p>7.7.1 Chapter 8: Ecology considers the potential effects of the Proposed Development on Courtland Wood LWS, Sparrows Copse, LWS and other undesignated ancient woodland. Mitigation proposals include the establishment and management of adjacent areas of complementary habitat to increase connectivity across the Site.</p> <p>The Root Protection Areas (RPAs) for the woodland and veteran trees have been calculated following the Natural England Standing Advice for ancient woodland and veteran trees (Natural England and the Forestry Commission, January 2022) which gives these trees a notably larger RPA than that proposed under the BS5837 (2012) formula.</p> <p>Measures to counter increased recreational pressure on Local Wildlife Sites and Ancient Woodlands have been considered in Chapter 8: Ecology including planting native species such as hawthorn, blackthorn and dog-rose.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>possible would become part of the core of the Nature Recovery Network with management to benefit nature.</p> <p>As this is a phased development, to discharge the biodiversity gain condition, an Overall Biodiversity Gain Plan demonstrating how the development will meet the 10% will need to be submitted. From then, prior to commencing any phase, a Phased Biodiversity Gain Plan demonstrating that phases' contribution to the overall 10% will need to be submitted to and approved by HDC. As part of the planning application, it would therefore be welcome for any phase metrics to accompany the overall metric, if the applicant wanted early review of these.</p> <p>One thing to (re)highlight is the woodland on the northern boundary of the site. MAGIC is flagging this as priority habitat, so a buffer would also be expected here too. A minimum buffer size to respect the woodland tree RPAs would be sufficient, and like other buffers, inclusion of spiky vegetation to act as a deterrent for public access. A reminder that some of the woodland within the site along the Downs Link (which lies outside of the LWS designation and ancient woodland parcel) is priority woodland habitat, and therefore clarification would be appreciated if this section of woodland will also receive a buffer (like that proposed for Courtland Wood).</p> <p>As per the request in Para 7.3.14, it is agreed that for where it is stated that surveys will not be updated as part of the current application in Table 7-1 (i.e., hedgerow survey), further survey is not considered necessary if a full application is submitted within 3 years of the survey date, unless one is necessary to further inform Biodiversity Net Gain calculations and other ecology surveys (e.g., estimating hazel dormouse population densities).</p>	
	<p><u>CIEEM Guidance</u></p> <p>Any forthcoming Environmental Impact Assessment (EIA) with an Ecology component (EcIA) should adhere to the CIEEM guidance (Guidelines for Ecological Impact Assessment in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine. September 2024).</p> <p>In addition to the content of the scoping opinion submitted to date, any future EcIA should include:</p>	<p><u>CIEEM Guidance:</u></p> <p>The assessment has been carried out in line with the CIEEM Guidance.</p>

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	<ul style="list-style-type: none"> • Updated baseline information resulting from updated desk study searches and ecology surveys, including limitations, assumptions and detailed methodologies, and determination of the importance of ecological features identified. • Identify data gaps. • Assessment of any construction, operation, and maintenance activities provided in detail, that may generate significant effects on ecologically important features, either directly or indirectly, in the absence of any mitigation. • Identify relationships with other environmental aspects, e.g., water and landscapes. • Any likely significant effects that may extend outside of the site boundary • Identify significant effects from other developments that may give rise to cumulative effects. • Characterise all impacts e.g., extent, magnitude, duration, reversibility, timing and frequency. • Detailed mitigation and compensation measures to overcome any significant effects and provide a clear summary of residual impacts and their significance. • Detailed enhancements to provide a biodiversity net gain. • Legal and policy consequences. <p>When conducting an EclA, considering alternative locations or layouts and the mitigation hierarchy to firstly avoid and then reduce impacts should be undertaken. Where necessary, justification for the location/layout should be provided when a resulting significant impact is identified.</p>	
	<p><u>Cumulatives:</u></p> <p>Section 15.3.4 under the Cumulative and in-combination effects states that ‘any development currently under construction that is expected to be completed before commencement of the construction phase of the Proposed Development</p>	<p><u>Cumulatives:</u></p> <p>Chapter 16: Cumulative Effects has not included developments currently under construction, or those already constructed, as best as possible. There are mentions of some developments already completed</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>will be excluded from the assessment'. It is therefore requested that any developments that fit this criterion are considered within the baseline assessment.</p> <p>In addition to the EIA report, the Applicant will also be required to provide sufficient information on non-significant impacts on protected/priority/notable habitats and species, so all likely impacts and effects are known. It is also advised to review the draft West Sussex LNRS (final LNRS when published) to determine if there are any habitat enhancement priorities within the site boundary.</p>	<p>which have been referred to as these have been included within the Chapter 9: Landscape and Visual assessments.</p>
	<p><u>Priority species</u></p> <p>It should be noted that the scoping opinion makes no reference to priority species (which are considered different to what broadly deemed as a 'protected' or 'notable' species), which must be included.</p>	<p><u>Priority Species:</u></p> <p>Priority species have been included within the assessment and as part of the surveys, in particular the Breeding Bird Survey which identified Dunnock, Song Thrush and House Sparrow.</p>
	<p><u>Watercourse</u></p> <p>Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Any impacts on the watercourse should also review impacts on protected/priority/notable species (fish, crayfish, etc) and downstream impacts on irreplaceable/priority habitats and designated sites.</p>	<p><u>Watercourses:</u></p> <p>Chapter 8: Ecology assesses the Upper Arun SSSI and its associated wetland habitats supporting important populations of wintering birds, invertebrates and plants. A detailed assessment on the Upper Arun SSSI is detailed in Section 8.6 of Chapter 8.</p> <p>Chapter 13: Water Resources, Flood Risk and Drainage considers the River Arun and its SSSI designation as part of the assessment, and that it is also not identified as a Nutrient Neutrality SSSI.</p> <p>The Flood Risk Assessment and Surface Water Drainage Strategy for the Proposed Development has been designed to maintain the current quantity of water feeding into the River Arun catchment.</p>
	<p><u>Preliminary Ecology Appraisal</u></p> <p>It is noted that no ecology survey information has been provided. A Preliminary Ecology Appraisal alongside any further recommended up to date ecology</p>	<p><u>Preliminary Ecology Appraisal</u></p> <p>A number of surveys were undertaken in 2025 including a Phase 1/UK Habitat Classification Survey, hedgerow, botanical, bat, dormouse,</p>

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	<p>surveys and an impact assessment will be expected as part of any forthcoming full application. As part of this, it is highlighted that the site falls within multiple SSSI impact risk zones. As mentioned within the Design Framework Document, Courtland Wood LWS is located within the red line boundary with other LWS located nearby (the closest approx. 0.5km). Irreplaceable habitat (incl. ancient woodland – both Courtland Wood and Smith’s Copse - and veteran trees) are noted to be on-site and nearby to the site. Parcels of lowland mixed deciduous woodland (LMDW, priority habitat) are also dotted north and south of the site. LMDW and other priority habitats are also within the surrounding area.</p>	<p>water vole and otter, ████████ reptiles, GCN and eDNA, and invertebrates. A full description of the surveys undertaken are within Chapter 8: Ecology, and in further detail within Appendices 8-2 to 8-15.</p> <p>The updated ecological surveys (where applicable) have been undertaken in accordance with CIEEM guidelines and the mitigation hierarchy.</p> <p>The Arboricultural Impact Assessment details the potential risks and mitigation measures for ancient woodlands and veteran trees.</p>
	<p><u>Designated sites</u></p> <p>The current zone of influence used for statutory designated sites is 10km. The 12km Bat Sustenance Zone for The Mens SAC must also be taken into consideration with regards to impacts on the SAC.</p>	<p><u>Designated Sites:</u></p> <p>Although different habitats and species will be subject to different ZOIs, the standard desk study searches extended at least 2km from the Site boundary in relation to nationally and locally designated sites and rare, notable and / or protected species. For designated sites of international importance, the search area was extended to a radius of at least 13km from the Site, which includes the Mens SAC and therefore incorporates the 12km Bat Sustenance Zone. Full findings of the desk study are provided Appendix 8.3: 2025 Desk Study Results.</p>
	<p><u>Bats</u></p> <p>If any communal bat roosts are identified, and in the absence of any information confirming the extent of the commuting and foraging habitats being utilised by the bats, the core sustenance zones for the species as per BCT guidance should be considered.</p> <p>The notable ecological considerations within the Design Framework Document include:</p> <ul style="list-style-type: none"> • Minimum 15m buffer around ancient woodland, with scope to increase to up to 50m (incl. for important hedgerows). • A 3-4m buffer west of New Road to reduce shading and detritus impacts on dwellings and associated gardens. 	<p><u>Bats:</u></p> <p>A minimum buffer of 15m for ancient woodland has been included within Chapter 8: Ecology, and the Arboricultural Impact Assessment. The parameter plans submitted as part of the application show a minimum buffer width around Smith’s Copse of 20m, around Two Mile Ash Gill of 15m, and around Courtland Wood LWS of 30m.</p> <p>The Root Protection Areas (RPAs) for the Veteran trees have been calculated following the Natural England Standing Advice for ancient woodland and veteran trees (Natural England and the Forestry Commission, January 2022) which gives these trees a notably larger RPA than that proposed under the BS5837 (2012) formula.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<ul style="list-style-type: none"> • Review RPA for T122 and other retained trees, and to avoid locating roads and dwellings within RPAs. • Avoid loss of two oak trees G101, and an updated location of sports facility. <p>These are positive inclusions. I would however add that the RPAs of any trees along the west of New Road should also be respected, in that any dwellings and associated gardens should be located outside any RPAs of retained trees. To reduce impacts of artificial lighting, it may be necessary in some areas for the 3-4m buffer to be vegetated to mitigate this impact. The woodland to the north of the site should also receive protection from an appropriately sized buffer, as this is also LMDW priority habitat.</p>	<p>Both T122 and G101 have been assessed in the Arboricultural Impact Assessment.</p> <p>The design includes creating woodland edge habitat within the appropriate buffer zone, routing recreational paths around the woodland, and lighting design to avoid artificial light within the woodland.</p>
	<p><u>LWS, Ancient woodlands, ancient and veteran trees</u></p> <p>Whilst efforts have been made to retain and, in some areas, enhance connectivity across the site, the spine road presents a major severance between the two woodlands (involving irreplaceable habitat and non-statutory designated site) and connecting hedgerows (and by this the Downs Link). As such, emphasis is given to the need to enhance connectivity across the spine road through canopy bridges and an appropriate species selection. This has not yet been demonstrated in the Design Framework Document.</p> <p>Courtland Wood LWS was last surveyed in August 2019. It has formerly been managed as a coppice with standards system. The understorey comprises coppice predominately of hazel and small-leaved lime, beneath standards of pedunculate oak and occasional ash. Records of greater butterfly-orchid has been identified within the LWS. It is therefore requested that the proposed buffer also comprise coppiced trees with species present in this LWS.</p> <p>Given the proximity of the proposed development to the existing woodlands, there may be an increased recreational pressure on these woodlands to which it is currently minimal. As such, strong barriers to prevent residential access will be required, to ensure that the existing woodland does not suffer degradation. This will also need to be a consideration when determining the target condition</p>	<p><u>LWS, Ancient woodlands, ancient and veteran trees:</u></p> <p>A revised internal arrangement was presented in respect of the ‘Spine Road’, moving toward a more defined ‘Primary’ and ‘Secondary’ road hierarchy, as now reflected in the Proposed Development</p> <p>The former spine road is removed and reconfigured as a pedestrian- and cycle-focused route north of Great House Farmhouse, reinforcing rural character and reducing traffic impact. Additional information can be found in the Design and Access Statement.</p>

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	<p>of the proposed landscape belt. Native spikey species such as hawthorn, blackthorn, dog rose etc could also be incorporated to act as a deterrent.</p> <p>The development site is within an area of ancient woodland.</p> <p>Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 193 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.</p> <p>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.</p> <p>The ancient tree inventory provides information on the location of ancient and veteran trees.</p> <p>Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.</p> <p>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.</p>	
	<p><u>Allotment</u> The new location of the allotments is located in close proximity to Smith's Copse (ancient woodland, a habitat sensitive to abiotic and biotic changes), and there are, therefore, concerns regarding potential impacts from fertilizers and biocides. It is understood that there will be a vegetated buffer surrounding the woodland, however particular consideration should be given to pollutant filtration to the north of the woodland and immediately surrounding the allotment.</p>	<p><u>Allotments:</u> Allotments relocated behind the primary school to improve access (from Worthing Road) and retain a more generous green setting around Great House Farmhouse and College Farm.</p> <p>As indicated in the Development Parameters and Illustrative Masterplan, undeveloped buffer strips of a minimum 15m in width, and in some instances substantially wider, will be maintained around the ancient woodlands within which no development activities will occur, with the exception of those specified</p>

Consultee	Comment	How will this be taken into consideration in the ES
		<p>Chapter 8: Ecology states that in addition, to the provision of a minimum 20m manged buffer between the allotment area and Smith's Copse, the design of the allotments should include measures such as the provision and location of composting facilities away from the woodland buffer, avoiding soil compaction and the use of permeable paving to reduce runoff. Additionally, information should be provided to allotment holders regarding the responsible use of fertilisers and pest control and / or a designated 'organic' allotment area be provided where the allotments abut the woodland buffer. It should be noted however that the current farming practices in the immediate vicinity of Smith's Copse are likely to result in substantially higher drift of fertilisers and pesticides into Smith's Copse than that likely to arise from the proposed allotments.</p>
	<p><u>Sports Pitches</u></p> <p>It is noted that the location of the proposed sport pitches are close in proximity to watercourses, hedgerows and woodland. It is therefore requested that all sports pitches are greenfield pitches. Where this is not possible and artificial pitches must be installed, there are initial concerns with regards to microplastic / infill and artificial lighting pollution.</p> <p>Artificial lighting sympathetic to wildlife will also need to be considered, both at the sports pitch locations and across the site.</p>	<p><u>Sports Pitches</u></p> <p>Sports pitches have been relocated (from south of the Downs Link), building on the existing provision at Broadacres to create a recognisable local sports hub.</p> <p>To the southern edge of the Great House Commons character area, informal, non-lit sports pitches are accommodated within open grassland, carefully positioned to maintain an appropriate separation from the heritage asset and to preserve its setting.</p> <p>Green corridors, ponds, SuDS features and adjacent sports provision will work together to support biodiversity net gain, sustainable drainage and everyday recreation and connections to the wider countryside.</p>
	<p><u>Hedgerows</u></p> <p>The layout should ensure that all proposed hedgerows are not sold within private curtilages of dwellings, to ensure they can be secured and managed for a minimum of 30 years. If the hedgerows are part of the plot, then these must be incorporated into the 'vegetated garden' classification.</p>	<p><u>Hedgerows</u></p> <p>Due to the scale of the Proposed Development this application provides a unique opportunity to secure provision of extensive areas of public open space, along with significant new tree and hedgerow planting and associated habitat creation along with the beneficial management of the woodland, hedgerows and individual and groups of trees. The open</p>

Consultee	Comment	How will this be taken into consideration in the ES
		space provision within the development extends to approximately 59 hectares. Chapter 9: Landscape and Visual shows over 1500 trees of 8-10cm and above and extensive hedgerow and scrub planting.
	<p><u>Biodiversity Net Gain</u></p> <p>Given the habitats identified on site, all 3 modules of the statutory metric will be triggered. It is noted that Two Mile Ash Gill with a meandering nature is present on site, which appears to merge with Marlpost Gill downstream and continue through several woodlands, and therefore assigning the classification of a ditch (as seen within the Design Framework Document) will need to be justified in any forthcoming application. Note that all other watercourses (excluding culverts and ditches) require a River Condition</p> <p>Assessment by an appropriately qualified assessor.</p> <p>Opportunities for wider environmental gains should also be considered.</p>	<p><u>Biodiversity Net Gain</u></p> <p>A Biodiversity Net Gain Assessment and calculations have been undertaken for the Proposed Development.</p> <p>The calculation for the loss/gain of ‘watercourses’ arising from the proposals identifies a total increase in biodiversity units of +2.29 units (gain) based on the current masterplan. This is an 25.55% increase over the baseline value of the Site, thereby providing an indication that the development proposals will achieve a 10% net gain in watercourse habitat units.</p> <p>Wider environmental gains where possible, have been considered.</p>
	<p><u>Strategic Significance</u></p> <p>Note that the LWS and surrounding buffer area and the adjoining watercourse and riparian vegetation are within a core site of the Wilder Horsham District Nature Recovery Network. Therefore, all habitats at baseline and post-development with a biodiversity value greater than zero that fall within this area are considered as having a medium strategic significance (as per HDC’s BNG webpage guidance).</p>	<p><u>Strategic Significance:</u></p> <p>Chapter 8: Ecology refers to the Wilder Horsham District Nature Recovery Network as part of the assessment. The Biodiversity Net Gain Assessment provides a summary of the metrics covering the Strategic Significance of various habitat types and receptors.</p>
	<p><u>Newts</u></p> <p>The development falls within the red impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the red impact zone, there is highly suitable habitat and a high likelihood of great crested newt presence. There are 56 ponds within 500m of the development proposal, 17 of which are onsite. There is a more recent great crested newt records onsite and within 500m. Natural England Standing Advice guidance for local planning</p>	<p><u>Newts</u></p> <p>A suite of updated GCN eDNA and HSI surveys have been undertaken for the Proposed Development, where the results can be found in Appendix 8.14.</p> <p>Great Crested Newt eDNA surveys conducted in 2025 included all accessible waterbodies within 300m of the Site and two Waterbodies (Waterbodies 9 and 35) within the wider area return positive results for Great Crested Newt eDNA.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>authorities advises that surveys on ponds up to 500m from development sites should be requested.</p> <p>The Scoping Report does suggest that some ecological surveys are due to be updated to support the upcoming application. We would recommend that surveys undertaken in regard to GCN are updated in order to support any future outline/full applications. Alternatively, due to the recorded GCN presence on site, the applicant may wish to enquire into the District Licensing scheme in order to demonstrate that the impacts of the proposed development can be addressed. Naturespace can be contacted at any time for a quote to enter the District Licensing scheme, which does not require further seasonally constrained newt survey work. More details on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com</p> <p>Note Natural England advice:</p> <p><u>District Level Licensing for Great Crested Newts</u></p> <p>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 ES.</p>	<p><u>District Level Licensing for GCN</u></p> <p>All works affecting Great Crested Newt terrestrial habitat will need to be carried out under either a District Licence or an EPS licence, to be obtained from Natural England.</p>
	<p><u>Chapter 8: Landscape and Visual</u></p> <p>See separate rows for responses from Natural England and HDC's Landscape Architect.</p> <p>HDC recommends the Horsham District Landscape Capacity Assessment (2021) and Southwater Landscape Sensitivity & Capacity Study, prepared for Southwater Parish Council (June 2018) are added to the baseline for completeness.</p>	<p>The suggested 2021 and 2018 landscape studies have been reviewed and added to the baseline in Chapter 9: Landscape and Visual Assessment.</p> <p>All HDC viewpoint requests have been incorporated, with the viewpoints agreed. This is confirmed in Sections 9.2.1 to 9.2.3 of Chapter 9: Landscape and Visual Assessment.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>With regards exact location of viewpoints and type of visualisation proposed (shown Appendix 8.1), please refer to the previous comments provided under separate topic meeting for suggested adjustments and/or additional viewpoints. In addition, HDC recommends that final viewpoint locations and type of visualisation (in accordance with The Landscape Institute (LI) Technical Guidance Note 06/19) are agreed with the HDC prior to the formal submission of the application.</p> <p>For both stages Construction and Occupation, HDC consider that transient receptors travelling along Two Mile Ash Road should also be scoped in.</p> <p><u>Elements proposed to scope out</u></p> <p>4. It is unclear on what is meant by 'The landscape receptors beyond the Site, as no physical changes are proposed beyond the red line boundary;' as the landscape setting of the site and receptors in close proximity to it, outside of the red line, would need to be scoped in.</p> <p>5. It is disagreed that the NCA should be scoped out. The development is of large scale and likely to have an adverse effect on the character area. Further, the cumulative effect of the proposals alongside recent development allowed within the area needs to be considered therefore for completeness, it is considered that this should be scoped in.</p> <p>6. The remaining receptors proposed to be scoped out are agreed.</p> <p><u>Appendix 8.1 - LVIA Representative Views and Methodology September 2025 Introduction - Field work</u></p> <p>7. As discussed, photographs illustrating the site with winter views are recommended</p> <p><u>Landscape and visual impacts</u></p> <p>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.</p>	<p>Representative viewpoints were selected based on a range of views of the existing Site (and a total of five) were agreed with the Landscape Officer at HDC.</p> <p>Transient users on Two Mile Ash have been scoped in. The assessment is presented in Sections 9.4 and 9.6 of Chapter 9: Landscape and Visual Assessment.</p> <p><u>Elements proposed to scope out:</u></p> <p>4. Landscape setting assessments have been detailed within the Landscape chapter, providing context on receptors both within and outside the Site boundary.</p> <p>5. National Character Area (NCA) and wider receptors have been retained in the scope of the assessment, see Chapter 9: Landscape and Visual Assessment.</p> <p>6. This point is noted.</p> <p><u>Appendix 8.1 - LVIA Representative Views and Methodology September 2025 Introduction - Field work</u></p> <p>7. Winter photography has been undertaken and is included in Appendix 9.4: Representative Winter Views – December 2025.</p> <p><u>Landscape and Visual Impacts:</u></p> <p>Chapter 9: Landscape and Visual details an assessment of the landscape character of the Site and its setting, however landscape character of the contextual landscape is scoped out. The chapter follows the suggested methodologies, policies and good practice guidelines.</p> <p>The following landscape character receptors have been identified against which effects resulting from the Proposed Development have been assessed:</p> <ul style="list-style-type: none"> ▪ Natural England NCA 121 Low Weald

Consultee	Comment	How will this be taken into consideration in the ES
	<p>The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies (https://www.gov.uk/guidance/landscape-and-seascape-character-assessments). 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> ▪ West Sussex Landscape Character Area H1 Central Low Weald ▪ Horsham District Landscape Character Area H1 Southwater and Christ's Hospital Farmlands ▪ Landscape Character of the Site and its Setting ▪ Site Landform and Drainage ▪ Site Vegetation ▪ Site Land Use ▪ Site Function <p>Material consideration has been given to the National Design Guide and National Model Design Code.</p> <p>The cumulative effects of the Proposed Development (on landscape) are provided in Section 9.6 of Chapter 9.</p> <p>Mitigation measures formed during the iterative design process, which have been embedded into the design of the Proposed Development, include the protection of characteristic landscape features, visual amenity and ecology; limits to building heights and the location of 'up to three storey' elements within the west of the eastern parcel; provision of green infrastructure parameters informed by the baseline findings of the LVIA; and provision of open space, more than policy requirements.</p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p><u>Chapter 9: Noise and Vibration</u></p> <p>1. Certain parts of the proposed development are located in close proximity to the heavily trafficked A24 dual carriageway, the proposals also include 'employment land' in the northern most part of the site. These on and off sources of noise are therefore potential constraints to development.</p> <p>2. To ensure the site is suitable for residential development any full or outline application for development on this site will therefore need to be supported by a robust noise impact assessment undertaken by a suitably competent noise consultant who are members of the ANC and are accredited to the Institute of Acoustics (IOA).</p> <p>3. We will also expect to see the proposed development adopt good acoustic design, following the principles of ProPG Planning and Noise. This should include, but not necessary be limited to, adequate separation between proposed dwellings and predominant sources of noise and habitable rooms not overlooking any proposed access road or yards areas.</p>	<p>1. As set out in the Transport Assessment (Appendix 12.1), the transport modelling does not include specific mitigation associated with the A24 corridor study which West Sussex County Council (WSCC) are expected to progress in 2026 which will deliver additional capacity with the aim of relieving traffic on the rural roads surrounding the Proposed Development. Furthermore, the strategic nature of the model is not able to fully reflect some of the traffic calming measures being promoted by the Proposed Development that would further aid in reducing traffic along the rural lanes. Once further information is available regarding the likely uses of the Site and the orientation of buildings, a detailed assessment may need to be undertaken considering the impact of noise on nearby residents (existing and future). However, at this stage without this information, only a qualitative risk-based assessment can be undertaken and therefore a magnitude of impact scale has not been adopted for this assessment.</p> <p>2. Additional noise surveys and modelling have been undertaken to provide updated baseline data in line with the changes to the Proposed Development in Chapter 10: Noise and Vibration.</p> <p>3. Night-time typical maximum event level (dB LAmax,5min) – The 10th highest of the maximum event levels per five minutes over the night-time period (23:00 – 07:00). Maximum event levels are used for the assessment of the suitability of the Site for residential use which is presented in Appendix 10.1: Site Suitability Assessment. The 10th highest of the maximum event noise levels is adopted as 'typical' in line with guidance within ProPG.</p> <p>The noise assessments incorporate good acoustic design in line with the appropriate legislation and guidance and aligning with other assessments for transport.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p><u>Chapter 10: Socio-Economics</u></p> <p>HDC expects following elements to be demonstrated to have been considered:</p> <ul style="list-style-type: none"> i) Socio-economic impacts of proposed traffic generation, traffic future growth, PRow management at crossings and the likely requirements for possible road closures and temporary traffic lights. ii) UK Power Networks notes there are overhead cables on the site running within close proximity to the proposed development. iii) Increased expenditure of the public purse to address increased recreational user pressure on Southwater Country Park and PRow network, Downlink. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure. iii) Increased pressure on local facilities and services based on recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south) to identify. Reference to be made to Horsham District Council Infrastructure Delivery Plan and need for priority build out of secondary school. iv) Increased pressure on local facilities and services based on recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south) to identify. Reference to be made to Horsham District Council Infrastructure Delivery Plan and need for priority build out of secondary school. v) impact on viability and vitality of Lintot Square vi) Playing pitch provision (lack of) in Southwater. HDC expects this scoped in for further assessment. vii) Gypsy and Traveller community viii) Horsham’s Local Cycling and Walking Infrastructure Plan 	<p>HDCs response has been noted and the Applicant responds with the below:</p> <ul style="list-style-type: none"> i) Chapter 11: Socio-economics and Chapter 12: Traffic and Transport (and the Traffic Assessment) both assess potential impacts of proposed traffic generation. ii) It is acknowledged that there are 11kV high voltage (HV) networks across the Site. This includes residential areas, the primary school site, secondary school site and the employment land. HV cables will be diverted as necessary to enable development. There are also some low voltage (LV) overhead cables on the Site near the dairy farm. These LV cables will be disconnected to enable development. This is covered in the Utilities Statement which forms part of the application submission. iii) The need for priority for the build out of a secondary school is discussed in the Design and Access Statement. The buildings and planning applications mentioned in the response are assessed in Chapter 16: Cumulative Effects. iv) The need for priority for the build out of a secondary school is discussed in the Design and Access Statement. The buildings and planning applications mentioned in the response are assessed in Chapter 16: Cumulative Effects. Chapter 11: Socio-economics presents the result of analysis of the impacts on healthcare and education. In relation to education, a nursery, a primary school and a secondary school are to be constructed as part of the Proposed Development. Chapter 11 concludes that there is a moderate beneficial significant effect on secondary education provision, a minor beneficial not significant effect on primary education provision, and negligible effects on early years provision and healthcare

Consultee	Comment	How will this be taken into consideration in the ES
	<p>In addressing likely significant effects of the above listed aspects, HDC considers there will be opportunities for various mitigation and compensation measures.</p> <p>The Scoping report does not address Mineral Extraction. It is noted that no mention is made within the Scoping Request to the West Sussex Joint Minerals Local Plan (2018) and specifically, Policy M9 - Safeguarding Minerals. It appears that the site sits within the brick clay and building stone safeguarding areas, so a Mineral Resource Statement would be required to assess this impact and feasibility of minerals extraction prior to development. This matter should be given due consideration as below.</p> <p>The application site covers an area of approximately 141ha and is located within the Weald Clay (brick clay) and Building Stone Mineral Safeguarding Area. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 (Joint Minerals Local Plan 2018, partial review 2021) at the application stage and a Mineral Resource Assessment (MRA) should accompany any formal submission for planning permission. As necessary, the MRA should inform any environmental statement.</p> <p><u>10.7.1: Table 10-6 Elements Scoped in for Further Assessment</u></p> <p>Needs to be demonstrated environmental constraints data sets PRowS (not just National Trails) used to feed into process at this stage.</p> <p>HDC expects following elements to be demonstrated to have been considered:</p> <ul style="list-style-type: none"> i) Socio-economic impacts of proposed traffic generation, traffic future growth, PRow management at crossings and the likely requirements for possible road closures and temporary traffic lights. ii) UK Power Networks notes there are overhead cables on the site running within close proximity to the proposed development. iii) Increased expenditure of the public purse to address increased recreational user pressure on Southwater Country Park and PRow network, Downslink. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights 	<ul style="list-style-type: none"> v) Lintot Square (and Southwater Country Park) have been considered within the Design and Access Statement, with regards to the Proposed Development's proposed new facilities will complement and support the existing Lintot Square, not compete with it. Walking and cycling provisions have been included in the design to connect Lintot Square and other areas within Southwater. Lintot Square is also considered within the Retail Assessment vi) Chapter 11: Socio-economics presents and assessment of open space and play space as a result of the Proposed Development. HDC's Playing Pitch Strategy and Open Space, Sport and Recreation Review (2021) recommends approximately +11ha of open space provision based on the quantum of development proposed, meaning the proposals substantially exceed these requirements (by around +48ha). vii) Appendix 11.1: Rapid Health Impact Assessment highlights that in the 2021 Census, 0.3% of the population in Horsham identified as Gypsy, Irish Traveller or Roma, which is the same as the England average. The Proposed Development provides 5 pitches for the Gypsy and Traveller community, forming an integral yet discreet part of the Northern Gateway. viii) The Transport Assessment takes into account the Horsham Local Cycling and Walking Infrastructure Plan. <p><u>Mineral Extraction:</u></p> <p>A Preliminary Mineral Resource Assessment has been submitted as part of the planning application. This outlines site geology, compliance with policy and practicability and viability of prior extraction of any minerals. It concludes that the majority of the site is not viable for commercial extraction and that the development overrides the presumption for mineral safeguarding, primarily due to the Site's</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure.</p> <p>iiii) Increased pressure on local facilities and services based on recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south) to identify. Reference to be made to Horsham District Council Infrastructure Delivery Plan and need for priority build out of secondary school.</p> <p>v) Impact on viability and vitality of Lintot Square</p> <p>vi) Playing pitch provision (lack of) in Southwater. HDC expects this scoped in for further assessment.</p> <p>vii) Gypsy and Traveller community</p> <p>viii) Horsham's Local Cycling and Walking Infrastructure Plan</p> <p>In addressing likely significant effects of the above listed aspects, HDC considers there will be opportunities for various mitigation and compensation measures.</p>	<p>strategic importance to local development and the capacity of existing extraction sites.</p>
	<p><u>Chapter 11: Traffic and Transport</u></p> <p>Needs to be demonstrated environmental constraints data sets PRowS (not just Major Roads) used to feed into process at this stage. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure.</p> <p>WSCC Highways note the methodology set out in chapter 11 (Traffic and Transport). It is recognised that the Traffic and Transport chapter of the EIA will make use of the data to be collected and used as part of the Transport Assessment that will be required to support a future planning application. The scope (and therefore the data) of the TA is under on-going discussion with WSCC Highways.</p>	<p>The Transport Assessment (Appendix 12.1) The surfacing, lighting, and signage will be contextually appropriate, with specific details to be finalised during the reserved matters stage. The design will ideally feature minimalistic and countryside-style elements to preserve the area's character. This design approach aims to maintain the area's rural nature while providing functional route for both walking and cycling.</p> <p>As outlined previously, WSCC have considered two mitigation schemes that could enhance the capacity and deliver improvement to the connectivity at the junction for pedestrians, cyclists and public transport users. WSP have considered an amended version of the WSCC scheme which includes a bus lane southbound as part of the signalisation works, alongside the pedestrian and cyclist improvements.</p>

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	<p>WSCC Highways: For the purposes of the TA, the study area has not been finalised with there being a likely need to include junctions and links within Horsham town centre. This is covered off within the EIA scope with the potential for additional junctions/links mentioned in 11.1.2</p> <p>See separate rows for responses from WSCC Highways and WSCC Public Right of Way.</p>	<p>A comprehensive Walking and Cycling Strategy has been devised as part of the Proposed Development. This includes the delivery of new and enhanced routes within the Site, as well as improvements to existing off-site routes.</p> <p>A number of key off-site walking and cycling routes to destinations such as Horsham and Christ's Hospital will also be enhanced by way of infrastructure improvements that will be delivered as part of the Proposed Development, or by way of a contribution to WSCC towards the delivery of these schemes.</p>
	<p><u>Chapter 12: Water Resources, Flood Risk and Drainage</u></p> <p>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.</p> <p><u>Flood Risk and Surface Water:</u></p> <p>Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage. It is suggested the proposed masterplan is overlaid with the Flood Zones and Surface Water Flood Risk mapping, to demonstrate how the sequential approach has been used.</p> <p>In detailing mitigation of likely effects for foul, Southern Water confirms it would expect foul drainage to connect to a public sewer for a development of this size.</p> <p>It is proposed to discharge surface water at greenfield runoff rates to watercourses within the site. In detailing mitigation of likely effects, it needs to be demonstrated in site investigations or infiltration testing to demonstrate why this is an appropriate approach, to ensure the application follows the SuDS Hierarchy and the National Standards for SuDS (NSfS). WSCC Local Lead</p>	<p><u>Water Resources, Flood Risk and Drainage:</u></p> <p>The Upper Arun SSSI has now been included within the technical assessment of Chapter 8: Ecology. It has also been noted in the Energy Statement that Natural England had withdrawn its Water Neutrality Position Statement and that the Applicant will comply with the appropriate guidance and regulations when submitting the application with regards to this matter.</p> <p>Additional consideration of water neutrality is provided in Chapter 8: Ecology and Chapter 13: Water Resources, Flood Risk and Drainage of the ES.</p> <p><u>Flood Risk and Surface Water:</u></p> <p>Covered in the Flood Risk Assessment (FRA) and Surface Water Drainage Strategy.</p> <p>Foul flows from the development will be connected to the public sewerage system at a point agreed with Southern Water.</p> <p>BRE 365 infiltration testing will be undertaken. Attenuation will be based upon greenfield runoff.</p> <p>Wet / dry ponds are in the FRA/SWDS which has been prepared with the parameters outlined.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>Flood Authority advice is that as an outline application is intended, calculating the greenfield runoff rate for the entire development that could drain into the proposed surface water drainage system. Then for each catchment, calculating a pro-rata rate to determine required attenuation from each catchment.</p> <p>Winter groundwater monitoring is also recommended for completion, as a measure as this will be required at detailed design stage (if not already installed this winter).</p> <p>As a mitigation measure, it is proposed to manage the surface water using swales and attenuation basins (with some permanently wet and some dry). HDC are supportive of the use of open SuDS features, as this follows the NSfS. Appropriate easements for the swales and basins will need to be considered, as this could have impacts on the parameter plan. Following experience with other sites, HDC suggest making it clear on all necessary drawings which basins will be permanently wet and dry. Given the size of the site, there may be opportunities to use SuDS for multi-functional purposes (such as education and recreation/amenity).</p> <p>To be considered robust mitigation, the drainage strategy should demonstrate a high-level description on how it is suggested the NSfS are followed at reserved matters. In the calculations, FEH22 rainfall, Cv value 1 and 10% urban creep are locally required. Depending on the modelling software being used the Additional Storage/MADD Factor will need to be 0. In line with the NSfS, 10% urban creep needs to be considered. The FRA must consider all sources of flood risk, with consideration of future flood risk. Any surface water flow paths shall not be obstructed. All watercourses/ditches within the red line must be retained, with a 3m maintenance easement from the top of both banks required. These must be clearly shown on drawings, to ensure that as the application progresses, easements are retained.</p> <p>The effects of climate change on surface water flood risk need to be considered. Although the LLFA has advised to use the HDC SFRA for surface water plus climate change modelling, the SFRA pre-dates the latest Environment Agency mapping so in itself is not as reliable. Best available data right now is the</p>	<p>The effects of climate change have been taken account of both within Chapter 13: Water Resources, Flood Risk and Drainage and across all relevant topics within the ES.</p> <p>The SuDS pro-forma has been completed as part of the Drainage Strategy within the Flood Risk Assessment, Annex G: SUDs Pro Forma.</p> <p>The effect of climate change will be taken account of and further information can be found in the CRRR.</p> <p>12.3.1 / 12.3.8 / 12.5.3 – Each of these aspects are included within the Flood Risk Assessment and Surface Water Drainage Strategy.</p>

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	<p>Environment Agency’s ‘Check your long-term flood risk mapping’ which could supplement with your own modelling.</p> <p>When preparing for submission, it is recommended using the SuDS Proforma (Please note this hasn’t been updated since the updated NSfS). HDC expect to see the following at outline application stage:</p> <ul style="list-style-type: none"> • Drainage layout showing labelled attenuation features and any proposed outfall locations. This shall include any required easements, as this could have impacts on the parameter plan. • Catchment plan to demonstrate natural catchments within the site are being followed. • Evidence that the hierarchy has been followed. • Quick storage estimates and runoff rates for the attenuation requirements. The labelling of features in calculations must match the outline drainage strategy. • HDC require proposals to follow the National Standards for SuDS. For an outline application, it needs to be demonstrated that Standard 1 (Run-off destinations/hierarchy) has been followed there is a viable method of draining the site. It also needs to be demonstrated that 1% AEP plus climate change event can be managed on site, without increasing flood risk elsewhere (Standard 3 (Management of Extreme Rainfall and Flooding)). This is because this is the Standard which affects the parameter plan the most significantly, therefore it must be demonstrated at outline stage that there is enough space for the required attenuation. • For Standards 2, 4, 5, 6 and 7, a high-level overview of the use of multi-functional SuDS and who it is thought will be responsible for the maintenance of the SuDS and ordinary watercourses (under riparian ownership) within the red line boundary is required. <p>12.3.1 Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage.</p>	

Consultee	Comment	How will this be taken into consideration in the ES
	<p>12.3.8 The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>Reference to water neutrality be updated. Refer to HDC website https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p> <p>12.5.3 Needs to be demonstrated environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into process at this stage</p>	
	<p><u>Chapter 13: Ground Conditions and Contamination</u></p> <p>See separate rows for responses from HDC’s Environmental Protection Officer and the Environment Agency.</p> <p>Needs to be demonstrated environmental constraints data sets (Source Protection Zones; Potentially contaminated land; Safeguarded minerals and waste sites/infrastructure (those already built) used to feed into process at this stage.</p> <p><u>Anthrax</u></p> <p>It is local ‘knowledge’ that Anthrax spores have been present in the site in the past. To anticipate public interest on this, it should be demonstrated to have been considered. The anthrax issue was raised during the previous Berkley homes development but the location of the alleged carcass burning and disposal site in the vicinity of Great House Farm was unknown. Additional survey work was undertaken as required by condition 13 to application DC/14/0590. The magnetometer survey identified a possible burning site but this lay outside the area of the development. The issue was further investigated by an expert from Porton Down chemical weapons establishment who concluded there was no evidence of elevated risk from anthrax.</p>	<p><u>Ground Conditions and Contamination:</u></p> <p>Refer to Chapter 14: Ground Conditions and Contamination. Historic waste sites have been considered in the chapter, and the Site falls outside the Source Protection Zone.</p> <p>Waste considerations are also considered in the Preliminary Ground Appraisal Report.</p> <p><u>Anthrax</u></p> <p>Anthrax risk has been considered in Chapter 14: Ground Conditions and Contamination and the Preliminary Ground Appraisal Report. Public Health England undertook an assessment of the burn sites and have concluded that no risk remains from burn sites.</p> <p><u>Soils</u></p> <p>The Agricultural Land Assessment carries out a review of the soil resources and BMV agricultural land, in line with NPPF guidance. There is loss of agricultural land, but this is land which would mostly be classified as not better than Grade 3b and is therefore not considered as best and most versatile land.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>As mitigation measure, to ensure the site is suitable for residential development any full application for development on this expansion of the site will need to be supported by a robust preliminary risk assessment (PRA), undertaken by a suitably competent, qualified and experienced environmental consultant.</p> <p><u>Soils</u></p> <p>The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):</p> <ul style="list-style-type: none"> • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted. This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk. • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. • The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise offsite impacts. <p>Soils will need consultation from the national stakeholder, Natural England.</p>	<p>It should be noted that while only preliminary intrusive investigations have been undertaken on the Site to date, further detailed investigation is required to inform the geotechnical design and geo-environmental conditions on-site. Ground conditions are not anticipated to prohibit development. The factors presented in Section 14.2 of Chapter 14: Ground Conditions and Contamination are required to inform detailed design.</p> <p>Measures to avoid or minimise impacts on soils are outlined in Chapter 14 and its supporting appendices.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p><u>Chapter 14: Greenhouse Gases</u></p> <p>The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.</p> <p>Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.</p> <p>The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.</p>	<p>A Greenhouse Gases chapter (Chapter 15) has been created to detail the likely significant effects the Proposed Development may have on greenhouse gases and the wider climate. The Climate Risk and Resilience Report (CRRR) considers the impacts posed to the Proposed Development by climate change and how the Project has and can increase its resilience to climate change.</p> <p>Climate resilience or adaptation measures (referred to as adaptive capacity) are taken into account for each Proposed Development component. Such measures may include technological and engineering solutions (termed 'grey' measures), nature-based solutions ('green' measures), or soft measures which include policy, legal, social, management and financial measures. The known adaptive measures have been identified through documentation review and engagement with the Applicant and design team. The adaptation measures have been reviewed and updated as the Proposed Development design developed between the EIA Scoping and the EIA Environmental Statement. A rating on a five-point scale is assigned to each Proposed Development component for each climate hazard and can be read in further detail in the CRRR. Further details in relation to the natural environment are within Chapter 8: Ecology.</p> <p>Species planting will also be undertaken to take into account climate change, through the inclusion of European and native species</p>
	<p><u>Chapter 15: Cumulative Effects</u></p> <p>The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure (construction and operational phases).</p> <p>An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of</p>	<p><u>Cumulative Effects:</u></p> <p>The Cumulative Effects chapter (Chapter 16) has assessed all appropriate developments, with a summary of all in-combination effects from across all technical chapters, as well as Appendix 16.1 outlining the Long and Short Lists of developments.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>projects should be included in such an assessment (subject to available information):</p> <ol style="list-style-type: none"> existing completed projects; approved but uncompleted projects; ongoing activities; plans or projects for which an application has been made and which are under consideration by the consenting authorities; and plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. <p>In light of the number of ongoing developments within the vicinity of the Proposed Development site, and potential evolution of the environment prior to construction and operation of the Proposed Development, the Applicant should clearly define their overarching approach to the prediction of future baseline conditions against the project programme.</p> <p>The ES should identify recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590, 193 units at Mill Straight DC/14/2582, and 131 units at Roman Lane DC/11/0657 to the south.</p> <p>Even granted outline consents (or subsequent reserved matters approvals) are part of the baseline for assessing significant environmental effects, ensuring the full picture of development in an area is captured:</p> <p>DC/23/1178: Outline planning application with all matters reserved save for access for the development of a Sports and Leisure Hub including the provision of communal facilities, nursery, Golf College, sports club house (containing Health & Fitness spa, changing facilities and food & beverage) and an educational facility for Warren Clark Golfing Dreams (Use Classes E, F1 & F2); a local centre containing a convenience store and co-working space (Use Classes E & F2); the provision of supporting landscaping, open space and related infrastructure; outdoor sports and leisure provision comprising Driving</p>	<p>The developments outlined in the response have been taken into account within Chapter 16: Cumulative Effects where required as part of the assessment.</p> <p>Technical teams considered other developments notably Horsham Golf park Denne and original outline planning application from Berkeley Homes on Worthing Road. Other housing developments were also considered.</p> <p>Chapter 16: Cumulative Effects has not included developments currently under construction, or those already constructed, as best as possible. There are mentions of some developments already completed which have been referred to as these have been included within the Chapter 9: Landscape and Visual assessments.</p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p>Range, reprovision of golf (including supporting golf facilities) and hockey (including pitches and training area) (Use Class F2) and up to 800 dwellings (Use Class C3). Horsham Golf Park Denne Park Horsham West Sussex RH13 0AX</p> <p>DC/21/1524: Proposed two-storey extension to the existing sports centre to provide two new swimming pools, spa facilities, two class studios, a fitness suite and cafe. Construction of a six-lane, all-weather running track with eight-lane sprint track and ancillary athletic facilities and floodlighting. Construction of a 3G artificial grass pitch with floodlighting. Relocation of spoil on land to the east. Creation of an unlit outdoor adventure area with 15 stations east of the new track. Associated car parking for 272 cars, and a new permanent access to Christ Hospital Road, closure of the existing Infirmary Drive access with conversion of disused section of drive to a sprint track. Erection of associated equipment store, fencing and lighting. Christs Hospital School The Avenue Christs Hospital Horsham West Sussex RH13 0LJ</p> <p>DC/24/0249: Reserved matters application for the erection of 96 dwellings and ancillary parking and landscaping following approval of outline application DC/20/0695 (up to 100 residential units with associated vehicular and pedestrian access), relating to layout, scale, appearance and landscaping. Rascals Farm, Shipley Road, Southwater, West Sussex</p> <p>DC/21/2180: Outline application for the erection of up to 73 new dwellings (up to 100% affordable housing) and retention of existing farmhouse building, associated public open space, landscaping, drainage and highway infrastructure works, including vehicular access from Shipley Road, with all matters reserved except for access. Woodfords Shipley Road Southwater Horsham West Sussex RH13 9BQ</p> <p>Section 15.3.4 under the Cumulative and in-combination effects states that 'any development currently under construction that is expected to be completed before commencement of the construction phase of the Proposed Development will be excluded from the assessment'. It is therefore requested that any developments that fit this criterion are considered within the baseline assessment.</p>	

Consultee	Comment	How will this be taken into consideration in the ES
	<p><u>Other Matters – Minerals Resources</u></p> <p>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.</p>	<p>A Preliminary Mineral Resource Assessment has been prepared and submitted alongside the ES as part of the Planning Application. This considers the West Sussex Joint Minerals Local Plan (2018) and Policy M9 - Safeguarding Minerals.</p> <p>The assessment outlines site geology, compliance with policy and practicability and viability of prior extraction of any minerals. It concludes that the majority of the Site is not viable for commercial extraction and that the Proposed Development overrides the presumption for mineral safeguarding, primarily due to the Site's strategic importance to local development and the capacity of existing extraction sites.</p>
South Downs National Park Authority	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.	Noted. No response required.
West Sussex County Council (WSCC) – Highways Authority	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.	Traffic related information required for Chapter 12: Traffic and Transport has been derived from the Transport Assessment that has been submitted alongside the ES as part of the Planning Application.
WSCC – Public Rights of Way	<p>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.</p> <p>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.</p> <p>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</p>	<p>The Proposed Development will deliver enhancements and improvements to footpaths, bridleways, and the Downs Link; with the creation of additional roads outlined in the Transport Assessment.</p> <p>The surfaces for pedestrians and cyclists will be suitable for wheelchair users, for example incorporating dropped kerbs and crossing points with associated tactile paving.</p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p>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.</p> <p>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.</p> <p>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 that would require appropriate improvement.</p> <p>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.</p>	
<p>West Sussex County Council (Minerals and Safeguarding)</p>	<p>WSCC Minerals and Waste Planning Authority have been consulted on this application for an Environmental Scoping Opinion form 1000 homes and associated infrastructure on land west of Southwater. While we do not have any specific comments to make in relation to potential environmental impacts at this stage, we would wish to raise the following matters:</p> <p>The application site covers an area of approximately 141ha and is located within the Weald Clay (brick clay) and Building Stone Mineral Safeguarding Area. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 (Joint Minerals Local Plan 2018, partial review 2021) at the application stage and a Mineral Resource Assessment (MRA) should accompany any formal submission for planning permission. As necessary, the MRA should inform any environmental statement.</p>	<p>A Preliminary Mineral Resource Assessment has been prepared and submitted alongside the ES as part of the Planning Application. This considers the West Sussex Joint Minerals Local Plan (2018) and Policy M9 - Safeguarding Minerals.</p> <p>The assessment outlines site geology, compliance with policy and practicability and viability of prior extraction of any minerals. It concludes that the majority of the Site is not viable for commercial extraction and that the Proposed Development overrides the presumption for mineral safeguarding, primarily due to the Site's strategic importance to local development and the capacity of existing extraction sites.</p> <p>Where major waste disposal operations are considered, targeted waste classification investigations will be designed as appropriate.</p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p>It is noted that the northern part of the application site is within the consultation buffer zone for existing waste infrastructure (Hop Oast/Horsham Household Waste Recycling Site). The applicant should demonstrate that the proposal should not prevent or prejudice the continued operations of the safeguarded waste site, as per Policy W2 of the West Sussex Waste Local Plan 2014. The applicant should demonstrate this by submitting a Waste Infrastructure Safeguarding Assessment as appropriate.</p>	<p>It is set out within the Transport Assessment that there would be no detrimental impact on the operation of the Hop Oast/Horsham HWRC site because of the anticipated acceptable impacts on the highway network including the Hop Oast junction. If deemed required, a Waste Infrastructure Safeguarding Assessment may be produced at reserved matters stage.</p>
<p>Horsham District Council (HDC) - Drainage</p>	<p>No adverse comments. The most up to date and relevant Policy, Legislation and Guidance has been considered with regards the Water Resources, Flood Risk & Drainage chapter.</p>	<p>Noted. No response required.</p>
<p>Member of the Public</p>	<p>Southwater has been grossly overdeveloped over the last 10 years. The loss of woodland, farmland, more flooding. There is not the infrastructure here to cope with anymore development. The Doctors surgery is full to capacity, schools are full, the roads in & out of the village are not designed or maintained well enough to cope with more traffic. We already have a serious problem with youth anti-social behaviour, drugs, no police, minimum warden activity. No train station, no easy walking route into Horsham.</p>	<p>Within Chapter 11: Socio-economics of the ES the change in demand for education and healthcare as a result of the operation of the Proposed Development has been assessed. The provision of the new schools and community facilities will improve capacity for the Proposed Development and the surrounding population.</p> <p>Within Chapter 12: Traffic and Transport an assessment of the anticipated increases in traffic associated with the Proposed Development has been assessed and potential mitigation to reduce the impact of the additional traffic on the highway network has been considered. A network of new and enhanced public rights of way (PRoW) are included within the designs of the Proposed Development, including walking routes to Southwater and Horsham.</p> <p>The potential loss of trees and woodland has been considered within the Arboricultural Impact Assessment that will be submitted alongside the ES as part of the Planning Application. Additional planting and hedgerow retention is a primary focus of the design of the Proposed Development and further detail of what is included is provided in the Design and Access Statement.</p>



Consultee	Comment	How will this be taken into consideration in the ES
HDC - Archaeology	<p>The submitted documentation identifies that the application will include cultural heritage as one of the main chapters within the EIA. It accurately portrays the archaeological potential of the site and correctly notes that a large portion of the proposed development lies within an Archaeological Notification Area. This notification area was put in place in part due to the results of a geophysical survey undertaken to the west of Southwater in 2011, that identified a number of features of probable archaeological origin, including enclosures, pits and multiple possible kilns or hearths.</p> <p>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, and, if feasible, combined with the results of the 2011 survey.</p> <p>Carrying out the survey at this stage would help inform the EIA and any future archaeological fieldwork or mitigation on the site.</p> <p>We note the identification of historic landscape boundaries and approve of the commitment to preserving them within the development.</p> <p>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.</p>	<p>The ES now includes Archaeology as part of Chapter 7: Cultural Heritage and Archaeology. This chapter details the potential impacts and effects on the ANA.</p> <p>The Site has been the subject to a part geophysical (magnetometry) and part drone multi-spectral survey to inform the assessment and also the scope and timing of further archaeological fieldwork. No construction phase work will commence prior to the completion of an agreed scope of archaeological investigation and reporting, to be agreed in advance with HDC and their archaeological advisors.</p> <p>Historic Landscape Boundaries - No response required.</p> <p>Paragraph 194 of NPPF - No response required.</p>
Historic England	<p>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.</p> <p>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 study radius from the site boundary; two additional Grade II*</p>	<p>Chapter 7: Cultural Heritage and Archaeology has been written to demonstrate that the collaborative design amendments that have been implemented follow the advice of Historic England and have ameliorated heritage harm to a level acceptable to Historic England. Historic England advises that further decision making on heritage sensitivities can be determined by the LPA and balanced against the delivery of public benefits (letter from Historic England, 8th December 2025). This is also in accordance with paragraph 202 of the NPPF and relevant local policies. Mitigation and opportunities for enhancement are considered in Section 6.6.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>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.</p> <p>In general, we agree with the conclusions of this analysis.</p> <p>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.</p> <p>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.</p> <p>It also helps illustrate the wider historic settlement pattern across this part of the Low Weald of dispersed farmsteads with intervening countryside in between.</p> <p>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.</p> <p>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</p>	<p>Please see earlier response to the Scoping Report Chapter 6: Heritage queries relating to Grade II* listed Great House Farmhouse.</p> <p>The HDC Conservation Officer and Place Services (archaeological advisors to HDC) have been consulted with as part the preparation of Chapter 7: Cultural Heritage and Archaeology of the ES.</p> <p>All the above issues have been addressed and the submitted advice followed.</p> <p><u>Policy & Recommendation</u></p> <p>The ES chapter has been written in line with NPPF and local policies to best avoid and minimise harm to heritage and archaeological assets.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>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 character and local distinctiveness of the area and its sense of place.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

Consultee	Comment	How will this be taken into consideration in the ES
	<p>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.</p> <p>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 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.</p> <p><u>Policy</u></p> <p>There will be a requirement through planning policy (NPPF and local policy) to avoid and minimise harm to heritage assets, and there will be a presumption in favour of conserving designated assets. By following planning policy and guidance we would also additionally expect the project to be creative in how it might offer opportunities for their enhancement, and how the project might deliver public (heritage) benefit.</p> <p><u>Recommendation</u></p> <p>We urge you to address the above issues and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact us for further advice.</p>	
UK Power Network	<p><u>Overhead Cables</u></p> <p>We note there are overhead cables on the site running within close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.</p>	<p>It is acknowledged that there are 11kV high voltage (HV) networks across the Site. This includes residential areas, the primary school site, secondary school site and the employment land. HV cables will be diverted as necessary to enable development. There are also some low voltage (LV) overhead cables on the Site near the dairy farm. These LV</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>In the instance of overhead cables within the vicinity, GS6 (Advice on working near overhead powerlines) and a safety visit is required by UK Power Networks. Information and applications regarding GS6 can be found on our website https://www.ukpowernetworks.co.uk/safety-equipment/power-lines/working-near-power-lines/advice-on-working-near-overhead-power-lines-gs6#Apply</p> <p>Should any diversion works be necessary because of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG.</p> <p>You can also find support and application forms on our website Moving electricity supplies or equipment UK Power Networks</p>	<p>cables will be disconnected to enable development. This is covered in the Utilities Statement which forms part of the application submission.</p>
Natural England	<p><u>General Principles</u></p> <p>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:</p> <ul style="list-style-type: none"> • 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). 	<p><u>General Principles</u></p> <p>The Applicant confirms that the Environmental Statement (ES) for the Proposed Development will remain compliant with the requirements set out in Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the associated Planning Practice Guidance and include the sections outlined in Natural England's response.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<ul style="list-style-type: none"> • 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 <p>Further guidance is set out in Planning Practice Guidance on environmental assessment and natural environment.</p>	
	<p><u>Contribution to local environmental initiatives and priorities</u></p> <p>The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.</p> <p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun <p>The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects</p>	<p><u>Contribution to local environmental initiatives and priorities</u></p> <p>The Landscape Strategy prioritises connectivity, biodiversity, and sustainability, while offering various recreational and ecological benefits to the community.</p> <p>The protection and enhancement of green spaces was a key theme raised during the public consultation. As part of the proposals, up to 59 hectares of public open space will be provided, including retained woodland, natural and semi-natural green space, amenity green space, parks and gardens, and children and youth play spaces (LAPs, LEAPs and a NEAP). Approximately 90% of the site’s historic hedgerows will be retained, enhanced and integrated into the scheme. A 5km trim trail is proposed to link all green spaces across the site, alongside a design approach that prioritises safety, inclusivity and accessibility, ensuring outdoor spaces are welcoming and usable for all age groups, including girls and young people.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.</p>	<p>Chapter 9: Landscape and Visual refers to the green infrastructure strategy which retains and protects the vegetation of the highest value including Ancient Woodland and veteran trees.</p> <p>In keeping with the objectives of West Sussex LNRS, the Weald to Waves project and the Wilder Horsham District partnership, the Proposed Development would provide opportunities to align the proposals for the public open green spaces with the aims of these strategies including enhancement of existing woodland habitats, new woodland and scrub planting to increase habitat connectivity between woodland parcels and provision of ecotone habitats along woodland buffers noted for providing biodiverse habitats.</p> <p>Chapter 9: Ecology provides a full assessment of the direct and indirect effects of the Proposed Development on Upper Arun SSSI, outlining appropriate mitigation measures and likely significant effects.</p>
	<p><u>Air Quality</u></p> <p>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) (https://uk-air.defra.gov.uk/library/reports?report_id=1001). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government’s Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England’s protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.</p> <p>The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic</p>	<p><u>Air Quality</u></p> <p>The assessment presented in Chapter 6: Air Quality will have due regard to this advice and guidance. The chapter address the potential impacts at ecological sites where impacts are anticipated. There are no qualifying protected ecological sites (i.e., Special Areas of Conservation, Special Protection Areas, RAMSAR wetlands of international importance or Sites of Special Scientific Interest) within 200m for affected roads. Air quality impacts on these protected ecological sites have therefore been scoped out as unlikely to be significant.</p> <p>Consideration is also given to the potential impacts at other ecological sites including Ancient Woodland, Local Wildlife Sites etc. In line with the IAQM guidance, the sensitivity of the area to ecological impacts is low.</p> <p>The effects of air quality on other ecological receptors that are not covered by Natural England advice is considered further in Chapter 8: Ecology.</p>

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	<p>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).</p> <p>Information on air pollution modelling, screening and assessment can be found on the following websites:</p> <ul style="list-style-type: none"> • 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 <p>Natural England has produced 'Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH₃), nitrogen oxides (NO, NO₂ or NO_x), nitrogen deposition, acid deposition and sulphur dioxide (SO₂).</p> <p>The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts.</p>	
	<p><u>Climate Change</u></p>	<p><u>Climate Change:</u></p>



Consultee	Comment	How will this be taken into consideration in the ES
	<p>The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.</p> <p>Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk (https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/), the National Adaptation Programme (NAP) (https://www.gov.uk/government/publications/climate-change-second-national-adaptation-programme-2018-to-2023), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) (https://nerc.ukri.org/research/partnerships/ride/lwec/report-cards/biodiversity/) and the UKCP18 climate projections (https://ukclimateprojections-ui.metoffice.gov.uk/ui/home).</p> <p>The Natural England and RSPB Climate Change Adaptation Manual (2020) (http://publications.naturalengland.org.uk/publication/5679197848862720) 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) (http://publications.naturalengland.org.uk/publication/6105140258144256) also provides extensive information on planning and delivering nature networks for people and biodiversity.</p>	<p>A Greenhouse Gases chapter (Chapter 15) has been created to detail the likely significant effects the Proposed Development may have on greenhouse gases and the wider climate. The Climate Risk and Resilience Report (CRRR) considers the impacts posed to the Proposed Development by climate change and how the Project has and can increase its resilience to climate change.</p> <p>Climate resilience or adaptation measures (referred to as adaptive capacity) are taken into account for each Proposed Development component. Such measures may include technological and engineering solutions (termed 'grey' measures), nature-based solutions ('green' measures), or soft measures which include policy, legal, social, management and financial measures. The known adaptive measures have been identified through documentation review and engagement with the Applicant and design team. The adaptation measures have been reviewed and updated as the Proposed Development design developed between the EIA Scoping and the EIA Environmental Statement. A rating on a five-point scale is assigned to each Proposed Development component for each climate hazard and can be read in further detail in the CRRR. Further details in relation to the natural environment are within Chapter 8: Ecology.</p> <p>Species planting will also be undertaken to take into account climate change, through the inclusion of European and native species</p> <p>The reduction in carbon sequestration due to the Proposed Development with regards to land use, land use change and forestry (B8) is not considered to be large and so has been scoped out.</p>

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	<p>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) (http://publications.naturalengland.org.uk/publication/5419124441481216) and the British Ecological Society's nature-based solutions report (2021) (https://www.britishecologicalsociety.org/policy/nature-based-solutions/read-the-report/) provide further information.</p>	
	<p><u>Heritage Landscapes</u></p> <p>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.</p>	<p><u>Heritage Landscapes</u></p> <p>No areas of land, buildings or their contents as part of the Proposed Development are eligible for conditional exemption from capital taxes.</p>
	<p><u>Environmental data</u></p> <p>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.</p> <p>Detailed information on the natural environment is available at www.magic.gov.uk.</p> <p>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 Geoportals.</p> <p>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.</p>	<p><u>Environmental Data</u></p> <p>The ES, primarily Chapter 8: Ecology provides an assessment utilising a range of data sets, which also covers SSSI Impact Risk Zones.</p>

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	<p><u>Biodiversity and Geodiversity</u></p> <p>General principles</p> <p>The National Planning Policy Framework (paragraphs 192-196) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the natural environment.</p> <p>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.</p> <p>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).</p> <p>Local planning authorities have a duty to conserve and enhance biodiversity as part of their decision making. Conserving biodiversity can include habitat restoration or enhancement. Further information is available at https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity</p>	<p><u>Biodiversity and Geodiversity</u></p> <p>Chapter 8: Ecology forms an Ecological Impact Assessment (EclA) carried out in accordance with CIEEM Guidelines.</p>
	<p><u>Designated nature conservation sites</u></p> <p><u>Nationally designated sites</u></p> <p>The development site is within or may impact on the following Site of Special Scientific Interest:</p> <ul style="list-style-type: none"> • Upper Arun 	<p><u>Designated nature conservation sites</u></p> <p><u>Nationally designated sites</u></p> <p>Chapter 8: Ecology assesses the SSSI Impact Risk Zones in Section 8.4 and 8.6. It is not expected that the proposal for residential development within the Site would result in any adverse impact on this or any other SSSI and the planning authority would not be expected to consult Natural England in this regard.</p>

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	<p>Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 186 of the NPPF. Further information on the SSSI and its special interest features can be found at www.magic.gov .</p> <p>Natural England’s SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal (https://naturalengland-defra.opendata.arcgis.com/datasets/sss-impact-risk-zones-england).</p> <p>The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.</p>	
	<p><u>Regionally and Locally Important Sites</u></p> <p>The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 192 and 193). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.</p>	<p><u>Regionally and Locally Important Sites:</u></p> <p>Chapter 8: Ecology considers impacts upon both regionally and locally important sites and species, including any mitigation required to manage potential risks.</p>
	<p><u>Protected Species</u></p> <p>The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is</p>	<p><u>Protected Species:</u></p> <p>Chapter 8: Ecology has provided an assessment on all protected species identified through desk-based assessments and additional</p>

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	<p>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 (https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005).</p> <p>The ES should assess the impact of all phases of the proposal on protected species [REDACTED]</p> <p>[REDACTED] 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.</p> <p>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.</p> <p>Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.</p> <p>Natural England has adopted standing advice (https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications) 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.</p>	<p>surveys, giving consideration to appropriate mitigation measures on reducing risks where identified. A number of updated surveys have been completed, of which the findings can be found in Appendix 8.2-8.15.</p>
	<p><u>Priority Habitats and Species</u></p> <p>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</p>	<p><u>Priority habitats and species</u></p> <p>Priority habitats and species have been addressed within Chapter 8: Ecology and Appendices 8.4-8.15.</p>

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	<p>the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here (http://jncc.defra.gov.uk/page-5705). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.</p> <p>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 (https://data.gov.uk/dataset/open-mosaic-habitat-draft1). Further information is also available here (https://www.buglife.org.uk/resources/habitat-hub/brownfield-hub/).</p> <p>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.</p> <p>The Environmental Statement should include details of:</p> <ul style="list-style-type: none"> • 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 	<p>During the initial and updated habitat surveys, habitats within the Site were appraised for their potential to support rare and / or protected habitats and species.</p> <p>Where the results of the desk study and extended Phase 1 habitat survey / UK Habitat Classification Survey indicated the presence and / or potential presence of habitats and species of nature conservation interest within the Site, further ecological surveys were conducted to establish baseline conditions in relation to these habitats / species. These are identified below together with the year(s) in which the surveys were conducted:</p> <ul style="list-style-type: none"> ▪ Bat surveys (2021 / 2022); ▪ Dormouse survey (2021 / 2022 & 2025) ▪ Otter and Water Vole survey (2021 / 2022 & 2025); ▪ [REDACTED] ▪ Wintering / Breeding Bird surveys (2021 / 2022); ▪ Reptile survey (2021 / 2022 & 2025); ▪ Great Crested Newt surveys (2021 / 2022 & 2025); ▪ Invertebrate survey (2021 / 2022); ▪ Hedgerow survey (2021 / 2022); and ▪ Phase 2 botanical survey of woodland and grasslands (2021 / 2022).
	<p><u>Ancient Woodland, ancient and veteran trees</u></p>	<p><u>Ancient woodland, ancient and veteran trees</u></p>

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	<p>The development site is within an area of ancient woodland.</p> <p>Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 193 of the NPPF sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.</p> <p>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.</p> <p>The ancient tree inventory provides information on the location of ancient and veteran trees.</p> <p>Natural England and the Forestry Commission have prepared standing advice on ancient woodland, ancient and veteran trees.</p> <p>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.</p>	<p>A minimum buffer of 15m for ancient woodland has been included within Chapter 8: Ecology, and the Arboricultural Impact Assessment. The parameter plans submitted as part of the application show a minimum buffer width around Smith’s Copse of 20m, around Two Mile Ash Gill of 15m, and around Courtland Wood LWS of 30m.</p> <p>The risk of indirect impact on the woodland has been significantly reduced as part of the layout design and will continue through any reserved matters application.</p> <p>The design includes creating woodland edge habitat within the appropriate buffer zone, routing recreational paths around the woodland, and lighting design to avoid artificial light within the woodland.</p>
	<p><u>Biodiversity net gain</u></p> <p>Paragraph 193 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.</p> <p>Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.</p> <p>Proposals for mandatory biodiversity net gain should be in line with the Environment Act 2021 and supporting regulations. Further information on biodiversity net gain, including draft Planning Practice Guidance, can be found here: https://www.gov.uk/government/collections/biodiversity-net-gain.</p>	<p><u>Biodiversity Net Gain</u></p> <p>A Biodiversity Net Gain Assessment and calculations have been undertaken for the Proposed Development.</p> <p>The calculation for the loss/gain across habitats and sensitive receptors and species is provided as part of the metric, using Defra’s Statutory Metric Tool.</p>

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	<p>The statutory biodiversity metric, together with ecological advice, should be used to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.</p> <p>The metric should be used to:</p> <ul style="list-style-type: none"> • 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 <p>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.</p> <p>Opportunities for wider environmental gains should also be considered.</p>	
	<p><u>Landscape and visual impacts</u></p> <p>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.</p> <p>The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies (https://www.gov.uk/guidance/landscape-and-seascape-character-assessments). 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.</p>	<p><u>Landscape and visual impacts:</u></p> <p>Chapter 9: Landscape and Visual details an assessment of the landscape character of the Site and its setting, however landscape character of the contextual landscape is scoped out. The chapter follows the suggested methodologies, policies and good practice guidelines.</p> <p>The following landscape character receptors have been identified against which effects resulting from the Proposed Development have been assessed:</p> <ul style="list-style-type: none"> • Natural England NCA 121 Low Weald • West Sussex Landscape Character Area H1 Central Low Weald

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	<p>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.</p> <p>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.</p> <p>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.</p>	<ul style="list-style-type: none"> ▪ Horsham District Landscape Character Area H1 Southwater and Christ's Hospital Farmlands ▪ Landscape Character of the Site and its Setting ▪ Site Landform and Drainage ▪ Site Vegetation ▪ Site Land Use ▪ Site Function <p>Material consideration has been given to the National Design Guide and National Model Design Code.</p>
	<p><u>Connecting People with nature</u></p> <p>The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.</p>	<p><u>Connecting People with Nature</u></p> <p>The Planning Statement, Design and Access Statement and Chapter 9: Landscape and Visual provide more details as to how the Proposed Development will provide approximately 59ha of open space across various typologies including natural, semi-natural and amenity greenspace, allotments, parks and gardens, and dedicated play facilities.</p>



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	<p>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.</p> <p>Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.</p>	<p>Public Rights of Way ('PRoW'), including the Downs Link, will be maintained and enhanced where appropriate, with links to the wider network retained. The proposals include a series of active travel improvements, both on-and off-site, linking the site to key destinations, including services and facilities in Southwater, Horsham, Christ's Hospital, and the wider PRoW network. An active travel assessment is included within the submitted Transport Assessment.</p> <p>HDC's Playing Pitch Strategy and Open Space, Sport and Recreation Review (2021) recommends approximately +11ha of open space provision based on the quantum of development proposed, meaning the proposals substantially exceed these requirements (by around +48ha).</p> <p>Dedicated play space will be provided throughout the Proposed Development, taking the form of Neighbourhood Equipped Area of Play ('NEAP'), Locally Equipped Areas of Play ('LEAP'), and Local Areas of Play ('LAP').</p> <p>In alignment with emerging Policy HA3, a 5km 'Trim Trail' is provided throughout the development proposals, featuring 'play on the way' opportunities and natural play features. A rapid Health Impact Assessment ('HIA') has been to identify the impacts on health, taking into account matters such as design, access to open space and nature, and access to health infrastructure.</p> <p>Irreplaceable habitats such as Ancient Woodland are protected through the provision of development buffers in accordance with best practice guidelines. The Proposed Development will retain and enhance natural and semi-natural habitats insofar as possible, alongside creating new habitats to promote enhancements to local biodiversity, including species-rich hedges and wildlife corridors throughout the development.</p>
	<p><u>Soils and Agricultural Land Quality</u></p> <p>Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water</p>	<p><u>Soils and Agricultural Land Quality:</u></p> <p>The Agricultural Land Assessment carries out a review of the soil resources and BMV agricultural land, in line with NPPF guidance. There</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 187 and 188 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.</p> <p>As set out in paragraph 223 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.</p> <p>The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):</p> <ul style="list-style-type: none"> • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted. <p>This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.</p> <ul style="list-style-type: none"> • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • 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 	<p>is loss of agricultural land, but this is land which would mostly be classified as not better than Grade 3b and is therefore not considered as best and most versatile land.</p> <p>It should be noted that while only preliminary intrusive investigations have been undertaken on the Site to date, further detailed investigation is required to inform the geotechnical design and geo-environmental conditions on-site. Ground conditions are not anticipated to prohibit development. The factors presented in Section 14.2 of Chapter 14: Ground Conditions and Contamination are required to inform detailed design.</p> <p>Measures to avoid or minimise impacts on soils are outlined in Chapter 14 and its supporting appendices.</p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>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.</p> <p>Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites (http://www.defra.gov.uk/publications/2011/03/27/construction-cop-soil-pb13298) and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction (https://soils.org.uk/wp-content/uploads/2021/03/WWS3-Benefitting-from-Soil-Management-in-Development-and-Construction.pdf).</p>	
	<p><u>Water Quality</u></p> <p>The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. If your planning application is affected by Nutrient Neutrality, the ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. These solutions or plans should be relevant to the specific planning consultation site.</p> <p>Further information can be obtained from the Local Planning Authority.</p>	<p><u>Water Quality</u></p> <p><u>Chapter 13: Water Resources, Flood Risk and Drainage</u> takes into account the risks of water pollution and how these can be managed and reduced.</p> <p>The River Adur has poor ecological and chemical water quality, however, is an important river system and nonetheless supports wildlife. The catchment is not identified as a Nutrient Neutrality SSSI.</p> <p>The River Arun demonstrates moderate ecological and chemical water quality, including locations near its origin. Notably, the catchment area is not identified as a Nutrient Neutrality SSSI.</p> <p>Receiving Waters Quantity / Quality Risk - risks will be managed through the CEMP. The CEMP will include details of construction phase surface water drainage strategy including drainage discharge controls for both flow rate and water quality. Risks will also be mitigated by adequate maintenance of the SuDS systems installed on the Site. In addition, the proposed pollution indices have been assessed and multi-stage treatment provided in line with CIRIA guidance to minimise this risk.</p>
	<p><u>Cumulative and in-combination effects</u></p>	<p><u>Cumulative and In-Combination Effects</u></p>

Consultee	Comment	How will this be taken into consideration in the ES
	<p>The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.</p> <p>An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):</p> <ul style="list-style-type: none"> a. existing completed projects; b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. 	<p>Noted. Technical chapters 5-16 have taken into account both construction and operational phases of the project. Chapter 3 also covers the construction and operational phases of the Proposed Development within Section 3.4.</p> <p>The Cumulative Effects chapter (Chapter 16) has assessed all appropriate developments, with a summary of all in-combination effects from across all technical chapters.</p>
Active Travel England	<p>ATE has produced a standing advice note summarising key active travel criteria that we will assess when consulted on a formal application. We have also published a planning application assessment toolkit to help gather evidence and assess the active travel merits – walking, wheeling and cycling – of a development proposal.</p> <p>Where the submission includes proposed plans of the site, ATE requires the applicant’s design or transport consultants to submit a completed toolkit prior to any engagement with us on this development.</p>	<p>The Transport Assessment (Appendix 12.1) of the ES details pre-application discussions held with ATE. It also provides an Active Travel Assessment in Section 4.4 which, to support the development of the toolkit, a qualitative analysis of local pedestrian, cycling and public transport infrastructure on routes from the proposed development to local facilities has been presented alongside the total score. An active travel infrastructure audit has also been conducted on the key routes identified in line with toolkit criterion 2. The infrastructure audit has been presented collectively for the categories of Walking, Cycling and Public Transport as per the Advice Note. This should be read in conjunction with the Walking Route Audit Tool (WRAT), which is included in Annex E of the Transport Assessment.</p>



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		<p>Chapter 12: Traffic and Transport also notes the importance of key active travel merits. Section 12.2 within this chapter summarises the consultations which have occurred with HDC, Horsham District Cycle Forum, and WSCC and stakeholders to discuss important matters such as walking and cycling strategies.</p>
<p>West Sussex County Council (WSCC) – Flood Risk</p>	<p><u>Flood Risk</u> WSCC agree flood risk should be scoped in.</p> <p>The FRA must include all sources of flood risk and follow PPG Flood risk and coastal change. The drainage strategy and supporting information submitted must use up to date parameters. It is strongly suggested that the use of open, source control SuDS is considered from the beginning of the design process for the masterplan for each phase, instead of reliance on traditional underground piped networks. Further guidance on this can be found in the PPG Flood risk and coastal change.</p>	<p>The Flood Risk Assessment (FRA) and Surface Water Drainage Strategy is compliant with the Planning Practice Guidance (PPG) and prepared using the most up to date parameters.</p> <p>SuDS features have been incorporated to manage flood risk and mimic existing greenfield characteristics as well as providing water quality balance to surface waters arising. Furthermore, the SuDS features have the potential for biodiversity net gain</p>
<p>Environment Agency</p>	<p>Thank you for consulting the Environment Agency on the above EIA Scoping Opinion Request. We have reviewed the submitted 'EIA Scoping Report' (dated October 2025, by WSP) and confirm that the scoping assessment is satisfactory in regard to matters within our remit</p>	<p>Noted. No response required.</p>
<p>Southern Water</p>	<p>Southern Water has no objections to the scoping application due to the submitted report advising using the SUDS drainage scheme.</p>	<p>Noted. No response required.</p>
<p>Sussex Police</p>	<p>I have reviewed the documents as submitted and have no comments to make from a crime prevention perspective</p>	<p>Noted. No response required.</p>
<p>Sport England</p>	<p>"...we do not wish to comment on the Screening or Scoping Opinion..."</p>	<p>Noted. No response required.</p>



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