

Maddy Truman
Quod

Our ref: EIA/26/0005
Your ref:
E-mail: Jason.hawkes@horsham.gov.uk
Direct line: 01403 215162
Date: 14th July 2026

Dear Ms. Truman,

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

Request for a formal EIA Scoping Opinion for the proposed development at Adversane (to be known as Kingswood), Horsham, West Sussex.

Following your email requesting a formal Scoping Opinion for the proposed development at the Kingswood, please find attached a copy of the Scoping Opinion issued on behalf of Horsham District Council. The opinion incorporates the views of the statutory consultees and other relevant departments within the Council.

You are referred to the full comments of the Environment Agency, Historic England, Natural England, HDC Landscape Officer and HDC Ecology. These can all be viewed on line via the HDC website: <https://www.horsham.gov.uk/planning> using the reference EIA/26/0005.

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

Yours sincerely

Jason Hawkes
Principal Planning Officer

Scoping Opinion: Comments of Horsham District Council & Consultees

Introduction:

- In relation to the progression of the emerging local plan, paragraph 1.18 is now out of date. The Kingswood site is now a draft allocation under the revised Regulation 19 submission. A provisional Local Plan Timetable has also been agreed with the Inspector. You are referred to the Council's website for updates on the progression of the emerging local plan: <https://www.horsham.gov.uk/planning/local-plan/local-plan-examination/Latest-News-from-Local-Plan-Examination>.
- It is noted that the Scoping Report does not specify the description of the development for the proposed planning application. Whilst not necessary for the Report, the exact description of the development needs to be agreed with the HDC Planning Officers, prior to the submission of any application.

Chapter 2: Site and Setting:

- Reference should be made to the site being within the 'Bat Sustenance Zone'. This is an HDC allocation and is consideration for ecological impacts for developments related to The Mens Nature Reserve and Ebernoe Common Nature Reserve. One of the special qualities of these areas is that they host protected species, including the Barbastelle and Bechstein's bats, which use the bat sustenance zone.
- Paragraph 2.13: Please state here the number of veteran trees within the site. If there are none, this should be stated.
- Paragraph 2.14: Reference should be made here to areas identified within the site for surface water flooding.

Chapter 3: Description of the Development:

- Under Land Uses, the maximum proposed floor space (sqm) of all the uses should be provided. This includes the floor areas for Local Centre Uses, Community Uses, Leisure and Sport and Hotel. Additionally, under gypsy and traveler land uses, a maximum of 15 pitches needs to be stated.
- Paragraph 3.13 states that the closure of the Adversane Level Crossing does not form part of the planning application. HDC does not agree with this statement. The closure would be required as a direct result of this proposal. The closure would need to be factored into any planning application in terms of timings and the delivery of the proposal. It is integral to the delivery of the proposal along with the provision of a rail bridge.
- Page 19 includes a proposed 'Land Use Distribution' plan. You should note that there have been recent discussions with the applicant regarding the sports provision for this proposal. This would result in an amended layout which needs to be reflected here.

Chapter 5: Socio-Economics:

- Reference needs to be made here to the residents directly affected by the proposal. These include all the properties at Adversane, within and adjacent the site.

Chapter 6: Transport & Access:

- Paragraph 6.25: Reference is made here to Adversane Land Level Crossing not being part of the proposal. As stated above, this element is considered part of the proposal and needs to be factored into the Environmental Statement.

Chapter 7: Air Quality:

- The Council's Air Quality Officer has made the following comments:
 - The Air Quality and Emissions Mitigation Guidance for Sussex 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. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes.

- In terms of modelling, additional traffic generated by the development is expected to affect Pulborough. Although no AQMA has been designated, concerns in the area have grown since the A29 landslide in 2023. Despite ongoing efforts to address the issue, congestion and vehicle queuing persist, influencing local air quality. NO₂ concentrations close to the air quality objective have been recorded at Church Hill/London Road. It is therefore essential that sensitive receptors in Pulborough are appropriately modelled and that any potential impacts are minimised.
- Consideration should also be given to the site's proximity to the Storrington AQMA, including the effects of any additional traffic.
- The assessment should be transparent and thus, where reasonable, all input data used, assumptions made, and the methods applied should be detailed in the report (or appendices). Please provide full statistical analyses to give full picture of the model performance.

Chapter 8: Noise and Vibration:

- The HDC Environmental Health will be making comments on this chapter. These comments will be forwarded to you as soon as they are received.

Chapter 10: Water Resources and Flood Risk:

- West Sussex County Council Local Lead Flood Authority have commented that, as this is an EIA scoping application it is accepted that the majority of the surface water related information will be included within any Flood Risk Assessment/Drainage Strategy provided with any substantive application, therefore the LLFA will provide detailed comments on matters within their scope when the planning application is submitted.
- While the LLFA appreciate the withdrawal of the Water Neutrality position statement, water recycling shall be considered for this application, as West Sussex is seriously water stressed (Standard 1 in National Standards for SuDS). There are several examples nationwide where water recycling has been used for strategic sites such as this one.
- You are also referred to the separate comments from the Environment Agency which can be viewed via the HDC website.

Chapter 11: Landscape and Visual:

- You are referred to the comments from the HDC Landscape Team which can be viewed via the HDC website.

Chapter 12: Biodiversity:

- You are referred to the comments from the HDC Consultant Ecologist and the Environment Agency which can be viewed via the HDC website.
- The HDC BNG Officer has commented that the proposed methodology, ZOI, and identified IEFs and current IEFs suggested to be scoped out (section 12.21), is generally agreed subject to further information being provided to support the impact assessment, as follows:
 - Impacts on local wildlife sites c.500m west of the site resulting from increased PROW use should be considered in any forthcoming EIA, given the scale of the development.
 - Further information such as desk study data and field survey evidence is expected to support the claim that the site contains no functionally linked land for Bewick's swan.

- It is requested that within the operational phase, pollution impacts on IEFs resulting from the proposed allotments and sports pitches are also assessed, and the watercourse within 10m of the site boundary in the south-west is also considered as an IEF and subject to an impact assessment.

Chapter 13: Cultural Heritage:

- The HDC Consultant Archaeologist has made the following comments:
 - The application site is within an Archaeological Notification Area- DWS8561 denoted for evidence of prehistoric, lithic working and mine pits, as well as later medieval and post medieval farmsteads and industrial activity, and Roman Stane street runs along the Western boundary of the site. An Environmental Impact Assessment Scoping Report is provided, and this document contains a Cultural Heritage Chapter which has been informed by a desk based assessment produced by Orion Heritage.
 - The report identifies that there are no designated heritage assets within the site boundary although there is potential for undesignated archaeological assets. To support the desk based research, a geophysical survey of currently accessible areas of the site has been carried out that has not revealed any definitive concentrations of archaeological activity, and a small scale field evaluation carried out to inform a previous application did not reveal any remains of archaeological significance.
 - The Scoping report recommends that further geophysical survey work should be carried out within areas that have not yet been surveyed and that these results will feed into an ES Chapter that will identify whether further investigation and mitigation is required. It is very probable that further investigation in the form of a comprehensive trial trench evaluation will be required, but as the surveys to date do not suggest that archaeological remains worthy of preservation in situ will be present, it is likely that this can be carried out following determination of the application secured by a planning condition. However, if the geophysical survey of the remaining areas suggests that significant remains are present then it may be necessary to require some targeted trenching prior to a decision.
 - The archaeologist has therefore confirmed that the Scoping Report correctly identifies that archaeology should be a topic within the proposed EIA and that the methodologies that are proposed will enable an informed decision to be made regarding the archaeological potential of the site and allow appropriate mitigation measures to be designed if required.
- The HDC Conservation Team have also commented that they are satisfied the approach described in Ch.13 Cultural Heritage is appropriate and they will not be asking for additional assessment than that described in the EIA scoping report.

Chapter 14: Climate Change:

- Chapter 5 of the emerging local plan outlines the Council's updated approach to climate change. In line with the Horsham District Council Climate Action Strategy, the Council's expectation is that new development supports the transition to net zero carbon in construction and operation. To deliver this, new development in Horsham District should maximise the smart use of renewable energy, enable the decarbonisation of our energy supply, use renewable or low carbon heat sources and be highly energy efficient to minimise energy demand and heat losses.
- You are advised to adhere to the policies outlined under Chapter 5 of the emerging local plan. All measures must be outlined in an Energy Statement to be submitted with any application.

Appendix 1: Initial Long List of Cumulative Schemes

- Since the Scoping Report was submitted to the Council, the list of proposed sites for allocation for development under the emerging local plan has been updated. The cumulative list of schemes needs to take this list of proposed development sites into account in assessing cumulative impacts.

- You are also advised to include the many planning permissions approved at Billingshurst and Pulborough. Billingshurst has several development sites with permission in place. This includes the development to the East of Billingshurst, development around Marringdean Road to the south and development to the North of Hilland Farm. Pulborough also has development coming forward, such as 170 dwellings approved at New Place Farm (ref: DC/21/2321). It is important that all of these extant permissions are factored into the list of cumulative schemes. A list of sites can be provided.

Other Comments:

- Horsham District Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England. This is administered by NatureSpace Partnership through their District Licensing Scheme as the council's delivery partner. The applicant needs to consider whether they wish to partake in the Licensing Scheme or if they would take the Natural England licensing route.
- National Highways have commented that they are '*concerned about the safety, reliability, and operational efficiency of the Strategic Road Network (SRN), in this case the A23 and the A27 in the vicinity of the site.*' National Highways have stated that they are happy to be engaged at the pre-application stage on the scoping of the Transport Assessment, including the modelling.
- West Sussex County Council Minerals and Waste have commented that the application site is located within the Weald Clay (brick clay) Mineral Safeguarding Area. Accordingly, the applicant should demonstrate how the proposal would comply with Policy M9 Safeguarding Minerals and (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.
- WSCC have noted that the northern part of the application site is within the consultation buffer zone for existing waste infrastructure at Adversane Lane (Metal Recycling). 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.
- UK Power Networks have noted that 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. In the instance of overhead cables within the vicinity, All works should be undertaken in line with GS6 guidelines as published by the HSE. 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.

End.