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DATE: 11th June 2026

Dear Sir/Madam

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

Reference: DM/26/1160

Location: Land To The South Of Reeds Lane Reeds Lane Sayers Common West Sussex

Proposal: Scoping Opinion for the development of up to 2,000 homes, community uses, employment, public open space and infrastructure including primary and secondary schools.

I refer to your Scoping Report received on the 7th May 2026 relating to the above site. In accordance with Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the District Council has adopted the following Scoping Opinion.

The District Council has consulted with the statutory consultation bodies as required by the EIA Regulations, as well as non-statutory bodies and has considered the responses received in forming this Scoping Opinion. All consultation responses have been placed on the relevant file that is available to view on the Council's online planning register, under the above reference number (DM/26/1160).

With the exception of land contamination matters as outlined below, in general terms the contents and structure of your Scoping report is considered acceptable. There are however a number of points in relation to specific matters within the Report that I would draw your attention too, and these are detailed below following the structure of your submission.

Section 4 - Proposed Development

Regarding 'Other Developments and Cumulative Effects' it is recommended that the list of cumulative schemes for consideration is kept under review by the Applicant. This is because, as part of the District Plan Examination, on the 15th May 2026 the Council published MS-TP4 Housing (Post Hearings Update) which includes a list of further housing sites for testing in addition to those already contained within the draft District Plan. This list includes additional housing sites in both Sayers Common (three sites totalling 475 houses) and Albourne (four sites totalling 326 houses). Further certainty of the likelihood of these sites progressing to a formal allocation should be known by the end of July 2026.

Section 5 - Landscape And Visual

The Council's Landscape Consultant has included a number of recommendations that the Applicant should take into account when preparing the Environmental Statement.

In respect of Landscape Character, paras 3.5 to 3.9 of the Consultant's response highlight the need for relevant LCAs to be included as separate landscape receptors within the submitted LVIA, with individual judgements for the assessed effects. Para 3.7 sets out the requirements for the LVIA. Para 3.8 also advises that the effects are broken down by Parcel where appropriate to provide a more accurate assessment of the more and less sensitive areas of the development.

In respect of Visual Amenity, a higher resolution viewpoint map should be submitted and viewpoint locations should include various PROW locations within the site as well as outside it. Accurate and additional viewpoint locations, which should also include views from winter months, are therefore required.

The Council's Landscape Consultant has also commented more broadly on the proposals at paras 3.15 to 3.19 of their consultation response and these matters should be taken into account by the Applicant.

Section 6 - Transport

West Sussex County Council is the local highways authority and in their comments dated 22nd May 2026 it is acknowledged that the majority of the transport related sections of the Environmental Statement will be drawn from the Transport Assessment being prepared to review the transport impacts of this development. The local highways authority will have input into the TA through the pre-application process and as such has confirmed that detailed comments are not required for this Scoping Opinion.

National Highways is responsible for the safety, reliability and operational efficiency of the Strategic Road Network, with the A23 being within the vicinity of the Site. The following comments from the National Highways response to this Scoping Opinion should be considered by the Applicant:

"Given the proximity of the proposal to the SRN (A23), the Transport Assessment (TA) must be prepared in accordance with the expectations of the government policy for the SRN which is the Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development. This policy context is recognised in para.6.8 of the EIA Scoping Report.

The modelling in the TA should adopt a vision-led approach to transport solutions which is focused on managing down the traffic impacts by maximising opportunities for sustainable and active travel and internalising movements as far as possible.

We welcome being engaged at the pre-application scoping stage for the transport evidence.

For those parcels of development land adjacent to the SRN (A23), the promoters need to consider boundary issues including drainage, geotech, landscaping, lighting, and boundary treatments."

Section 7 - Air Quality and Odour

I would draw your attention to the comments of the Council's Environmental Protection Officer, received 12th May 2026. The Officer has confirmed that there has been no consideration of the Council's guidance on emissions mitigation which is found in the "Air quality and emissions mitigation guidance for Sussex (2021)". Within this guidance there is an expectation that an emissions mitigation assessment is completed including a damage cost calculation and an indication of the mitigation measures to an equivalent level.

Section 8 - Noise and Vibration

I would again draw your attention to the comments of the Council's Environmental Protection Officer, received 12th May 2026. In particular, the following comments should be taken into account:

"It is not clear whether there will be air source heat pumps provided throughout the development. The assessment of these would be a necessary part of any subsequent noise assessment. It is noted that the applicant expects that the requirement of a detailed assessment of plant and building services will form part of any decision notice that is issued as a condition within the approval."

Section 9 - Biodiversity

Natural England has confirmed that a robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. The Applicant's attention is specifically drawn to Annex A of the Natural England response letter (dated 27th May 2026) which provides their advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

The Environment Agency has noted that the Scoping report highlights the presence of existing culverts on site and highlights that their policy is to seek to de-culvert where possible with a recommendation for consideration of this as part of any submission. It is also noted in the Environment Agency comments that Herrings Stream is an important migratory route for eels and sea trout and consideration should be given in this regard as part of any survey work.

The Council's Ecological Consultant has confirmed the scope of the Environmental Statement is agreed and has made a number of recommendations for the Applicant to account for in their submissions. The finalised Environmental Statement should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation and any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.

Regarding 'Habitat Assessment', the submissions should clearly demonstrate how the mitigation hierarchy has been applied and it is recommended that consideration of notable arable flora should be considered as part of the updated botanical assessment.

Regarding 'Protected and Priority Species', the Council's Ecological Consultant has confirmed that appropriate species surveys have been recommended, with these informing the finalised mitigation and compensation measures to be secured during the construction and operation phase. It is agreed that a detailed assessment for aquatic vertebrates would be disproportionate based on the likely impacts but it is nevertheless recommended that a statement should be included within the finalised Environment Statement on this matter.

The Environmental Impact Assessment should thoroughly explore all reasonable options to deliver on-site enhancements in line with the Biodiversity Gain Hierarchy. Opportunities to

enhance linear features and create coherent ecological networks should be explored as part of the design. It is agreed that a detailed River Condition Assessment will be required for this application and all condition assessments for the pre-development baseline should be included within the Biodiversity Net Gain Assessment. This should also include habitat maps of the pre-development baseline and a copy of the Statutory Biodiversity Metric - Calculation Tool (Excel spreadsheet).

Regarding reasonable biodiversity enhancements, the Council's Ecological Consultant has confirmed these could be provided upfront within the application or outlined within a Biodiversity Enhancement Strategy to be secured as a condition of any consent. The proposed measures could include integrated bird and bat boxes which match the brick types of the new buildings.

Section 10 - Cultural Heritage

Historic England has included a number of recommendations that the Applicant should take into account when preparing the Environmental Statement.

In respect of heritage assets and their settings, these recommendations relate to what 'setting' should encompass, the scope of the assessment area, the impact on features/landmarks within the South Downs National Park and inclusion of the assessment of impacts on both the Langton and Albourne Conservation Areas.

In respect of the Historic Landscape Character, Historic England recommends the inclusion of an assessment of the scheme's effect upon Historic Landscape Character. The Site has a strong historic landscape character and how this contributes to the appreciation and understanding of the significance of the designated heritage assets should also be identified. Close collaboration of the cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets, is recommended. 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. Impacts on views of the site from heritage receptors on the South Downs should also be included.

The Council's Conservation Officer agrees with the points made by Historic England and reiterates the caution against adopting too narrow an interpretation of setting in terms of the assets which may be affected by the proposal. The Conservation Officer has confirmed that the list of assets identified should also include:

- The Langton Lane Conservation Area.
- Knowles Tooth, Langton Lane (Grade II listed).
- Kingscot, London Rd, Sayers Common (Grade II listed)
- Aymers and Sayers, London Rd, Sayers Common (Grade II listed)
- Coombe Farm House, Coombe Barn and Granary at Coombe Farm, London Road, Sayers Common (Grade II listed)
- Please note Goldbridge House, Langton Lane, has been incorrectly called Goldberg House

It is also recommended that the area is assessed for potential Non Designated Heritage Assets in the form of historic farmsteads. The West Sussex Historic Farmstead and Landscape Character assessment which is accessible via the Heritage Gateway may be helpful here.

Section 11 - Water Environment / Flood Risk

Southern Water has no objections in principle to this proposal, but are unable to comment further as they would require full drainage disposal details to enable a full reply.

West Sussex County Council is the Lead Local Flood Authority. In their response it has been confirmed that given the type of application and pre-existing surface water flood risk, it is agreed that Flood Risk should be scoped in. The Lead Local Flood Authority will continue to work with the applicant through the pre-application process to ensure impacts are minimal.

Regarding groundwater and drainage, the Environment Agency supports the scoping in of the water environment/flood risk but has confirmed that this needs to consider any increase in flood risk from sewer flooding and water supply capacity and these issues will require consultation with local water and waste water providers. A foul drainage strategy needs to be provided as there is known to be limited capacity for additional flows in this area.

In respect of Flood Risk specifically, the Environment Agency has welcomed the statement that built development is not proposed within the flood zones in accordance with the vulnerability classification. The Applicant's attention is drawn to the Environment Agency's detailed comments on if residential accommodation is to be provided within Flood Zones 2 or 3, flood plain compensation and permit requirements for activities close to a main river.

Section 12 - Socio-Economics

I am content with the proposed approach to Socio-Economics as set out in the information to support this Scoping Opinion.

Section 13 - Climate Change

I am content with the proposed approach to Climate Change as set out in the information to support this Scoping Opinion.

Section 14 - Other Matters for Consideration

It is considered that Ground Conditions and Contamination matters should be scoped into the Environmental Statement. It is not yet known what development will take place within Parcel C (as identified by Location Plan - Appendix 1 of Scoping Report) and as such a precautionary approach should be followed.

The Council's Land Contamination Officer has commented as follows:

"Our contaminated land records indicate that the Site parcels are predominantly in agricultural use, which is associated with a low overall risk of land contamination. However, a number of historical features that could have potentially led to localised land contamination have been identified.

Within Parcel A, Council records indicate the presence of two historic tanks located in the south western corner of the parcel since circa 2001. The nature and contents of these tanks are unknown, and further investigation would be required to fully understand the risks.

In addition, part of Parcel C overlaps with the recorded location of a historic landfill site known as "Opposite Hickstead Showground" (Environment Agency Ref: EAHL19923). The landfill is understood to have accepted mixed wastes, including industrial, commercial and household waste. On this basis, the potential for ground gas generation cannot be ruled out.

Given the nature of the proposed development, which includes residential uses, schools and other sensitive receptors, the presence of a historic landfill has the potential to introduce requirements for ground gas protection measures, as well as other remediation costs. While this would not represent an objection to the application, conditions would be needed, and it

may have implications for scheme design, phasing and viability if not adequately addressed at an early stage.

The applicant is therefore advised to ensure that land contamination and ground gas matters are considered, particularly in relation to Parcel C, so that potential risks and associated cost implications are clearly understood at an early stage."

The Environment Agency shares the same view. In their response dated 29th May 2026 the Environment Agency has commented that:

"Ground Conditions and Contamination is proposed to be scoped out of the ES, however there is a historic landfill north of Sayers Common. Therefore, we would like to see Land Contamination scoped into the ES and to reconsider all potential sources of contamination across each parcel. The risks from the historic landfill will need further investigation and potential remediation to prevent any existing contamination being mobilised during the construction and operational phases of the site, particularly in relation to the provision for surface water drainage."

Section 15 - General Approach and Form of ES

I would request that all topic chapters in the Environmental Statement start by providing a no more than a two page summary of conclusions - on likely significant effects, critical evidence to support this and a summary of any mitigation / enhancement anticipated. This will assist the future consideration of the Environmental Statement by stakeholders.

I note the summary of the Environmental Statement appendices documents (para 15.8) and planning application documents (para 15.11) that will be submitted and there are no further additions I would make to that at this stage - although it is noted this has been discussed in more detail as part of the pre-application discussions. I would draw your attention to the full consultation responses received in the respect of this Scoping Report, which are on the public file, in the preparation of these supporting documents.

In line with the Regulations, this Scoping Opinion will be placed upon the Planning Register.

Yours faithfully

A handwritten signature in black ink, appearing to read 'EO', with a long horizontal stroke extending to the right.

Eric Owens
Interim Assistant Director Planning and Sustainable Economy

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