



Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Switchboard: 01444 458166

DX 300320 Haywards Heath 1
www.midsussex.gov.uk

Daniel Frisby
Griffin House
135 High Street
Crawley
West Sussex
RH10 1DQ

CONTACT: Stephen Ashdown
PHONE: 01444 477326
E-MAIL: steve.ashdown@midsussex.gov.uk
DATE: 8th October 2021

Dear Sir/Madam

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

Reference: DM/21/3099

Location: Land West Of Imberhorne Lane Imberhorne Lane East Grinstead West Sussex

Proposal: Scoping Opinion for the proposed Mixed-use development comprising 550 dwellings, Care Village, playing fields associated with Imberhorne Secondary School, land for a 2 Form Entry Primary School (with early years provision), a local centre and strategic area of Suitable Alternative Natural Greenspace, formal and informal open space, along with residential access from Imberhorne Lane

I refer to your Scoping Report received on the 24th August 2021 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 statutory bodies as required by the Regulations, as well as non-statutory bodies and have considered the responses received in forming this Scoping Opinion. It should be noted that not all consultees notified of the submission of your Scoping Report have provided comments to the Council and should these received following the issuing of this Scoping Opinion, I will forward them onto you for your information. 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.

In general terms the contents and structure of your Scoping report is considered acceptable, however, there are 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 2 - Environmental Characteristics of the Site and Surroundings

In paragraph 2.24, in relation to drainage, it is incorrectly stated that the site is entirely located in Flood Zone 1. While is clarified in latter sections of the Report in respect of the 'developable area', the northern part of the SANG land does fall with Flood Zone 2 and 3 and it is important to ensure that this distinction is recognised. However, this has not altered the response in respect to this Scoping Opinion.

Section 4 - General Approach to the EIA

Within this section the approach to the EIA is set out and in particular paragraph 4.12 deals with the individual topic chapters (5 - 10) within the structure of the Environmental Statement (ES) (Volume II). I would request that all topic chapters in the ES start by providing a no more than a 2 page summary of conclusions - on likely significant effects, critical evidence to support this and summary of any mitigation / enhancement anticipated. This will add future consideration of the ES by stakeholders

In respect of Cumulative impacts, there is request in paragraph 4.24 to identify other developments the Council are aware of in the vicinity that could have significant effects on the environment cumulatively with the proposals contained within the Scoping Report. I would draw your attention to the following;

Consented schemes;

- Hill Place Farm, East Grinstead (AP/16/0009)
- 15 and 39 Crawley Down Road, Felbridge (DM/17/2570)
- 11A Crawley Down Road, Felbridge (DM/18/3022)
- 17 Copthorne Road, Felbridge (DM/16/5502)

Current Schemes;

- Floran Farm, Hophurst Hill, Crawley Down (AP/21/0024) - FYI Appeal hearing was recently held, and decision is awaited.
- Possible Future Allocations;
- SA19 - Land south of Crawley Down Road, Felbridge

Section 5 - Significant Effects

Potential impacts of the development on transport and highways

Linked to this section of the report, is a transport appraisal note contained in the appendix 2.8 of the Scoping Report. While I understand that the majority reflects the initial discussions that have taken place with the Local Highway Authority, there are however some detailed elements that need to be addressed. Namely, the assessment of walking and cycling appear to be based upon out of date guidance. The maximum walking distance quoted is from the rather dated CIHT guidance. Current evidence suggests the majority of walking trips are no more than 1 mile/1.6km. This should therefore be the acceptable maximum walking distance. In addition, there is no reference within the cycling assessment to the publication of LTN 1/20. This is the guidance against which cycling should be assessed. Such matters should be corrected through the Transport Assessment and reflected within the consideration of this topic in the ES.

Potential impacts of the development on air quality

In considering the impact on air quality, the Council have published a 2021 Annual Status Report, which highlights the additional monitoring locations in East Grinstead which have been chosen to investigate an exceedance of the object level for annual mean concentration of nitrogen dioxide long London Road in East Grinstead. There are 6 additional monitoring locations, the precise locations and results of which are presented in the 2021 report. This Report should be used in the assessment going forward and not the now outdated 2018 Annual Status Report.

It is expected that the assessment of the potential impacts of the development should take account of the results from all these monitoring locations (as identified in the 2021 Report) and be aware of the investigation into the London Road location where there may be a candidate air quality management area. An evaluation of the impact of the proposed development should stretch to this area and the likely impact on the annual mean nitrogen dioxide level should be included.

Potential impacts of the development on noise

The general methodology set out is considered acceptable however given the development makes provision for 2FE entry primary school and early years provision, it is expected that some reference to 'Building Bullet 93: acoustic design of schools - performance standards'.

Potential impacts of the development on cultural heritage

This chapter is split between the cultural heritage that is below ground (archaeology) and that which is above ground - 'the built heritage' (listed heritage assets and designated scheduled monuments).

In respect of archaeology, in reference to the Magnitude of Impact table (5.7), some categories, especially in relation to 'Local' importance, may require re-consideration due to the sensitivity of below ground archaeology remains to any form of development, which is likely to result in total and irretrievable loss of data. However, it may be that the 'Magnitude of Impact' here is considered together with the ability for this impact to be mitigated through appropriate archaeological measures, in which case that should be made clear within the assessment process.

Archaeological impacts should also be considered within the proposed SANG area, potential impacts include (but are not limited to) the area of car parking, construction of ponds, and planting schemes. If necessary a management plan should be produced which considers archaeological impact on ongoing land management.

In terms of the drafting than references to "East Sussex" should be replaced with "West Sussex", "Mid Sussex" or the "Archaeological Representative to Mid Sussex District Council" as appropriate.

In respect of the built heritage, when considering the assessment of significance (paragraph 5.62) consideration should be given to the impact on the setting/character of the approaches (PRoW's, roads etc) to the specific assets.

In respect to any topic identified within section 5 of the Scoping Report not specifically referred to above, then I am satisfied with the matters as set out.

Section 6 - Non Significant Effects

In respect of the topics listed within this section of the Report, I am content that these matters are scoped out of the final ES. Although it is recognised that many of these areas will be subject to separate detailed supporting reports as part of the overall planning application submission.

I note the summary of the reports that will be submitted in paragraph 6.26 of your Scoping Report and there are no further additions I would make to that at this stage. I would draw your attention to the 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 that reads "SA Benfield". The signature is written in a cursive, slightly slanted style.

Divisional Leader for Planning and Economy

SCOPEZ