



Matthew Porter
Senior Planning Officer
Horsham District Council
Parkside, Chart Way, Horsham,
West Sussex, RH12 1RL

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BROADBRIDGE HEATH DEPOT

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) – REQUEST FOR A SCREENING OPINION FOR THE PROPOSED RE-DEVELOPMENT OF HAILSHAM TOWN CENTRE

Dear Matthew,

On behalf of our client, West Sussex County Council, we write to you under Regulation 6(1) of the Town and Country Planning (Environmental Impact Regulations) 2017 (as amended) (hereby referred to as the EIA Regulations) to request a Screening Opinion for the proposed re-development of the form Broadbridge Heath Depot on the edge of Horsham, West Sussex.

Background

The Broadbridge Heath Depot, owned and operated by West Sussex County Council, was identified to be surplus to requirements as a Highways Maintenance Depot in 2018. The Site forms part of the Broadbridge Heath Quadrant, identified in the Horsham District Council Local Plan¹ as providing a strategic opportunity for commercial development. The intention for the development of the site remains a strategic policy for the draft Local Plan² currently in development.

Consequently, West Sussex County Council are looking to submit a planning application for the Site for commercial development, in line with the proposed allocation of the site as part of the Broadbridge Heath Quadrant.

The Site

The Broadbridge Heath Depot ('the Site') is a brownfield site situated on the western periphery of Horsham, located between the A24 and the A281 at approximately National Grid Reference TQ 15161 31002 and identified in Figure 1. The site is approximately 2.1 hectares in size and is currently used as a highway maintenance depot, with smaller areas accommodating a training centre and parking for school buses.

¹ Horsham District Council (2015) Horsham District Planning Framework (excluding South Downs National Park). November 2015.

² Horsham District Council (2020) Horsham District Local Plan 2019 – 2036. Public Consultation (Regulation 18) Version. February 2020.

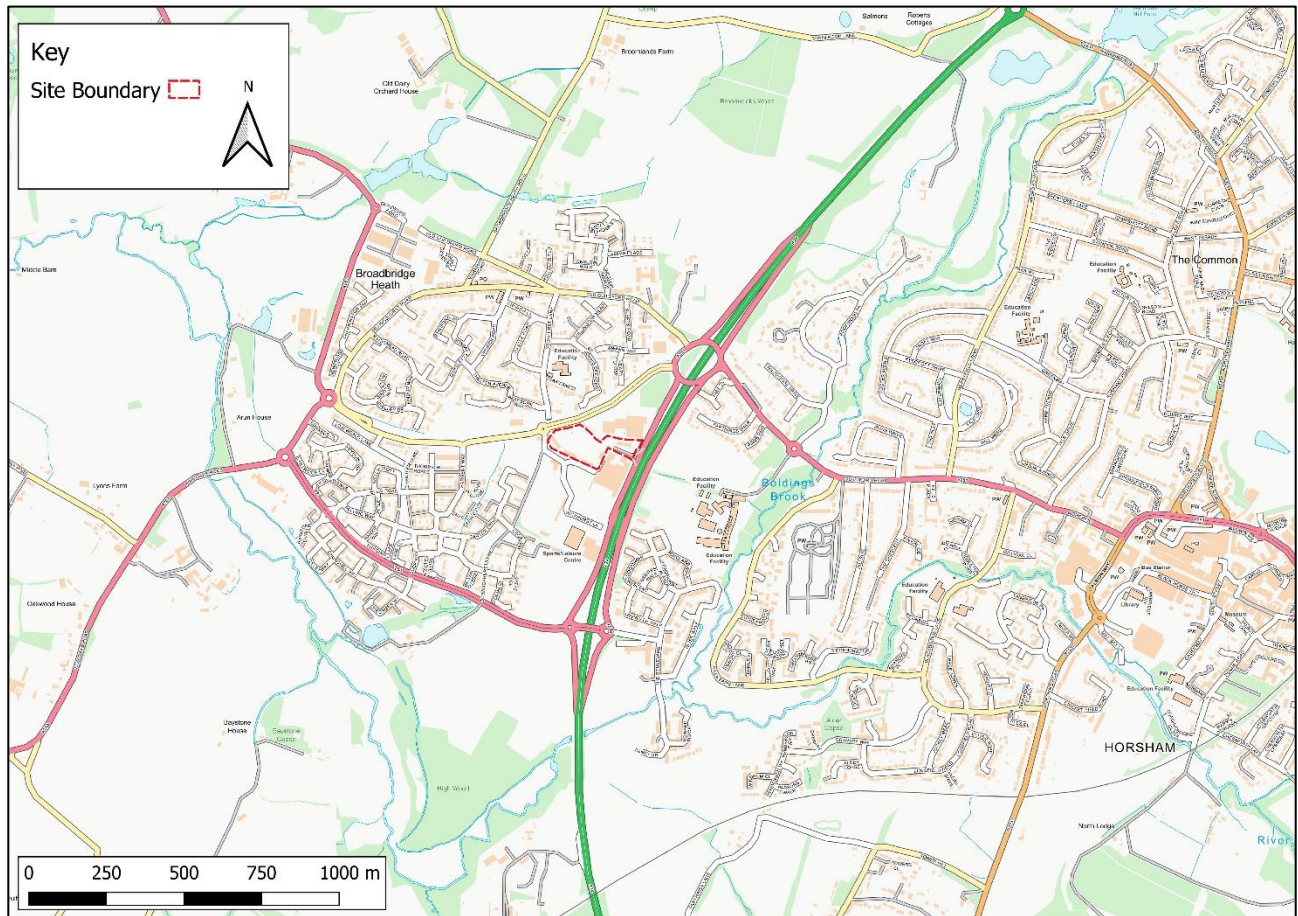


Figure 1 *Site Location (Contains Ordnance Survey data © Crown copyright and database right 2019)*

The Site is located in a developed area of Horsham, with the area adjoining the site to the north comprising retail units and surface car parking with associated landscaping, and the adjacent site to the south occupied by a major superstore and leisure facilities with surface car parking and associated landscaping. The site is accessed from the A24, which is located to the east of the site, and via the superstore access road, off Wickhurst Lane. The A281 borders the site to the north-west.

The Proposed Development

The Proposed Development includes the demolition of existing buildings, clearance of the site and the erection of two retail units (Class E), two café/restaurants (Class E) with a proposed floorspace of circa 4,982 sqm Gross Internal Area (GIA) with associated parking (234 spaces), access, servicing, signage and landscaping. The current proposals for the site are identified in Figure 2.

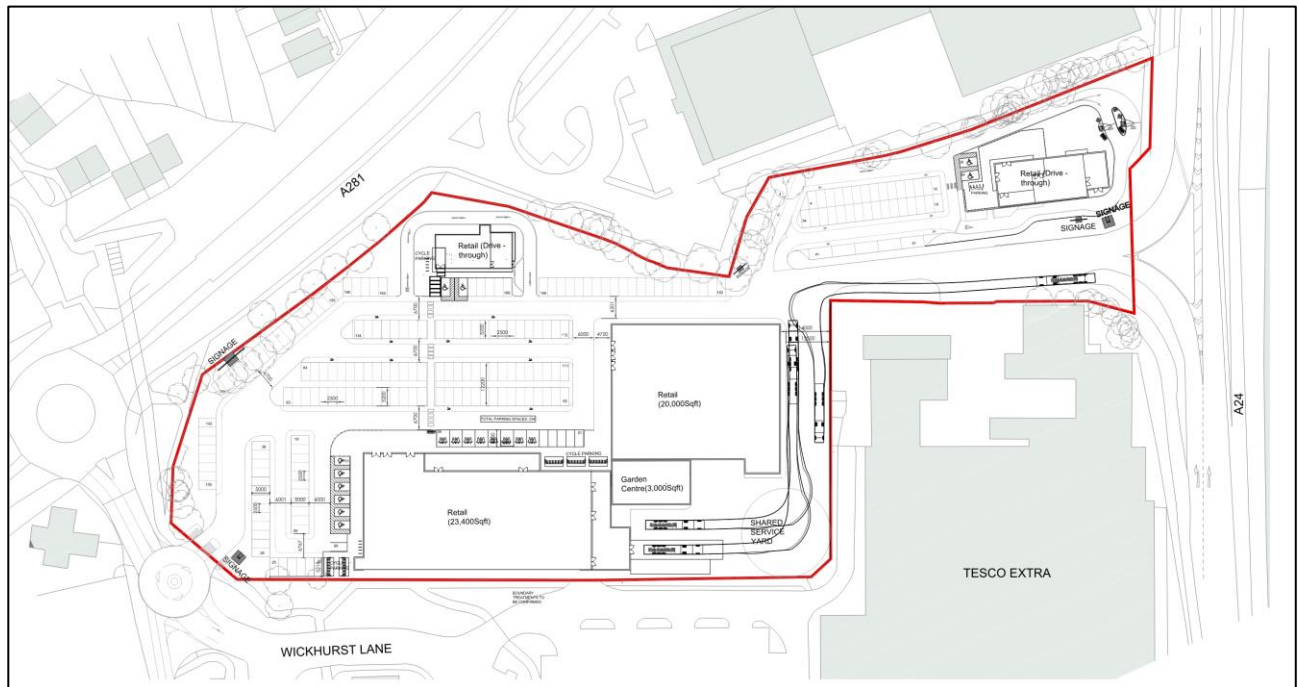


Figure 2 *Proposed Development of the Broadbridge Heath Depot Site*

Determination of EIA Requirement

In determining the need for an EIA of the Proposed Development, there are three main aspects for consideration. These are:

- The type of development: is it of a type referenced in the EIA Regulations, as either:
 - a Schedule 1 development; or,
 - of sufficient scale to fall within the specified thresholds of development identified in Schedule 2;
- The location of the Application Site: is the development within, adjacent or in close proximity to a particularly sensitive location; and/or,
- The nature of the development: is the development of a type that is likely to give rise to significant environmental effects.

For those developments in Schedule 2 it is important to consider the potential for significant environmental effects based on the context of the site and proposals, with planning practice guidance noting in Paragraph 018 of the EIA guidance (Reference 4-018-20170728) that *‘only a very small proportion of Schedule 2 developments will require an Environmental Impact Assessment’* and that *‘it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects’*.

The Proposed Development, as described above, does not fall within any of the Schedule 1 development types under the EIA Regulations. The Proposed Development would be considered an urban development project (Development type 10b) under Schedule 2 of the Regulations, for which the following thresholds are applicable:



- The development includes more than 1 hectare of urban development which is not dwellinghouse development; or,
- The development includes more than 150 dwellings; or,
- The overall area of the development exceeds 5 hectares.

The Proposed Development does not exceed the dwelling threshold (no dwellings proposed) or the overall site area threshold (totalling 2.1 ha in area), however the proposals do exceed the area threshold for non-dwellinghouse development with car parking, access roads and Class E units occupying an area of more than 1 ha.

The indicative threshold criteria, provided through the planning policy guidance, identifies that EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Therefore, key issues to consider are identified to be the physical scale of development and their potential increase in traffic, emissions and noise.

Environmental Sensitivities

The following discussions on environmental sensitivity is based on the Screening Matrix referenced in Planning Practice Guidance to provide a clear audit of considerations in assessing the need for an EIA.

Natural Resources

As a brownfield site in a well-developed area, with hardstanding and buildings covering the majority of the existing Site, the Proposed Development is not expected to result in notable changes to the topography of the area. The site does not support any high quality or scarce resources, with tree cover on the site limited to peripheral areas and not in a safeguarded area for minerals³ with the site falling within the urban area of Horsham and not the Brick Clay Resource Mineral Safeguarding Area that envelopes the western side of Horsham.

In line with the Local Plan requirements, specifically those relating to the Broadbridge Heath Quadrant, the design will embrace the highest standards of sustainable design and construction in line with local and national policies. The type of buildings proposed are of relatively simple construction with standard materials. Furthermore, the Local Plan requires development of the site to incorporate innovative design that ensures efficient use of renewable or low carbon energy. Therefore, with a significant focus on sustainability aspects and considering the nature and scale of the proposals, the Proposed Development is not considered likely to have extensive need for resources that are non-renewable or in short supply and the impacts associated with resource requirements are unlikely to be significant.

Waste

Demolition of the existing site will generate some construction wastes, however given the extent and type of buildings on the Site demolition arisings are anticipated to be relatively small. Opportunities for recovery and recycling can be considered, in line with good practice guidelines.

³ West Sussex County Council (2018) Joint Minerals Local Plan. July 2018.



The Proposed Development will see an increase in wastes generated in the operation of the site, however there will be a change in the type with less hazardous wastes generated than from the existing site uses. Through a Waste Management Strategy, wastes generated in both the construction and operation can be adequately controlled to ensure wastes are managed through the waste hierarchy. Consequently, considering the nature and scale of the Proposed Development, additional waste generation is not considered likely to cause a significant effect.

Pollution and Nuisances

The Site is not located in an area that is known to be subject to pollution or environmental damage that exceeds legal environmental standards. The Site and surrounding area are not identified as falling within an Air Quality Management Area that reflects exceedance of common air quality pollutant concentrations, and based on the activities in the surrounding area the levels of noise generation are unlikely to be significant, particularly in the context of reduced noise levels as a result of the restriction of traffic along the A281 to the north where residential units are at their closest to the Site.

The operations on the site are not expected to generate notable levels of emissions, particularly with the Local Plan requiring a focus on sustainability and consideration of low carbon and renewable energy use. Emissions to air will occur as a result of additional traffic generated by the Proposed Development, however any subsequent effects are unlikely to be significant. Traffic volumes on the A281, where affected roads are closest to sensitive receptors, have reduced as a result of local traffic realignment, however prior to the realignment traffic volumes were not of significance as the area was not subject to an AQMA designation. Other emissions to air are not expected based on the development proposals.

The operation of the Proposed Development will not cause significant noise and vibration or light, heat or energy or electromagnetic radiation releases, with appropriate design ensuring levels will be reduced. There is potential for adverse effects as a result of noise and lighting during construction, as acknowledged in the Sustainability Appraisal for the Local Plan⁴, however these can be managed through a Construction Environmental Management Plan to ensure adverse effects are minimised and not significant.

Based on the existing land use, there may be some limited risk of ground contamination through the Proposed Development, including remobilisation of historic contaminants associated with the Site. However, the sensitivity of the site is relatively low as it is not connected to surface water bodies and the Site is not in an area of groundwater vulnerability. Nevertheless, any contamination encountered on the Site will be managed in line with regulations and best practice and, considering the nature and scale of activities on the existing site, are not anticipated to give rise to significant effects.

Population and Human Health

Major accidents, being man-made or natural and of significant scale, such as major road traffic accident, which threatens immediate or delayed serious environmental effects to human health, welfare and/or the environment, are not considered likely from the Proposed Development. Considering the nature and scale of the Proposed Development, through construction, operation and decommissioning, any accidents that may occur are highly unlikely to generate this level of environmental effect.

⁴ Horsham District Council (2015) Sustainability Appraisal Environmental Report. Horsham District Planning Framework (excluding South Downs National Park). November 2015.



The Proposed Development is not expected to present a risk to the local population and their health during construction, operation or decommissioning. The Site is not in direct connection with local surface waters and, as described further under Water Resources, presents an opportunity to improve risks associated with surface water flooding. Air quality effects from the construction phase can be managed using commonly adopted best practice to reduce impacts from dust emission, with the immediate surrounding environment being of relatively low sensitivity to dust generation. As described above, air quality effects associated with traffic are not considered likely to have significant environmental effects, particularly when considered against a context of falling emissions as a result of cleaner vehicles and the increased adoption of electric vehicles.

As a result, the Proposed Development is not considered likely to pose a significant risk to the local population as a result of activities on the Site.

Water Resources

The Site is not considered to be at risk of fluvial flooding, with the entirety of the site located within Flood Zone 1. Review of the Strategic Flood Risk Assessment (SFRA) for Horsham District⁵ identified the site to be at a low risk of ground water vulnerability with no records of groundwater flooding identified in Horsham District. The Site is, however, in an area that has been identified as subject to localised sewer flooding.

Areas of the site are potentially vulnerable to surface water flooding, with the government resource⁶ identifying that the western side of the site, currently hardstanding and car parking, is subject to a medium to high risk of surface water flooding, with a low risk in the car parking area of the site also on the western and northern parts of the Site. This is also reflected in the SFRA findings. Alongside the Site, the subway beneath the A281 is identified as being at high risk of surface flooding, which extends along both the northern side of the A281 and Wickhurst Lane. However, as the Site does not sit within a Critical Drainage Area the re-development of the Site presents an opportunity to alleviate some of the surface water flooding issues in the locality through the provision of appropriate Sustainable Drainage Systems (SuDS) as part of the development, providing beneficial effects to the surface flooding risk associated with the western side of the Site. This approach aligns with the Local Plan, which looks for the use of innovative SuDS on the site, and would satisfy the requirements of the SFRA in limiting the discharge of surface water to the sewer network.

As the Proposed Development is over 1 hectare in size, a planning application will need to be accompanied by a Flood Risk Assessment that will ensure these considerations are adequately addressed by the design. Consequently significant effects are not considered likely.

Biodiversity and Species

Neither the Site nor the surrounding area are subject to statutory or non-statutory designation for ecological interest. The closest designated site for ecological value is Warnham Local Nature Reserve, which is located c. 1.9 km to the north-east of the Site and disconnected from it with development between. A small area of deciduous woodland, a UK BAP habitat, is located 86 m to the north of the Site alongside the A281/A24 junction, however this is limited in extent and isolated from other semi-natural habitats by major roads and surrounding development, although the woodland is linked through trees and scrub habitat to the Site. Nevertheless, development of the site is not likely to adversely affect the woodland habitat.

⁵ Horsham District Council (2020) Horsham Strategic Flood Risk Assessment. Final Report, January 2020.

⁶ UK Government (2019) Flood Warning Information Service. Long Term Flood Risk. Accessed through <https://flood-warning-information.service.gov.uk/> on 16th March 2021.



The existing depot is principally hardstanding and buildings that are principally of industrial nature, although a single storey building with a pitched roof is present on the eastern side, with semi-natural habitats comprising trees and scrub around the periphery of the site. Considering the extent of habitat present on site, species potentially present would be restricted to those typically found in urban environments and common nature, such as nesting birds, and as the site is relatively isolated from similar habitats in the surrounding environment, only mobile species are likely to be present. Although nesting birds and roosting bats could, potentially, utilise the site for nesting/roosting, any presence is likely to be restricted to common species and in the case of bats likely to be restricted to night roost opportunities for individuals, with development impacts on which being classified as low⁷. Impacts on biodiversity are not, therefore, likely to be significant.

Landscape and Visual

The Site is located within the Low Weald National Character Area, which is a broad, low-lying clay vale which wraps around the northern, western and southern edges of the High Weald. It is identified as being predominantly agricultural and has many densely wooded areas with a high proportion of ancient woodland. The area is identified to be at pressure from development, however the Site is located in an area already classified as built-up from 2011 according to the Multi-Agency Geographic Information for the Countryside (MAGIC) website⁸. The site and surrounding area is not subject to protection for its landscape or scenic value, the closest of which is the High Weald Area of Outstanding Natural Beauty located on the eastern side of Horsham.

The Site is located on a brownfield site within an urban area, with vegetation around the periphery of the site providing screening to the existing site. Although the screening surrounding the site may be altered by the Proposed Development, the Site is not in a significantly visible location with only around 6 residential properties on the northern side of the A281 that directly overlook the site. Visibility to the north and south is associated with retail areas similar in nature to that proposed, whilst visibility to the east is associated with views from the A24 only with screening on the A24 restricting views from the east.

The Local Plan requires development of the site to provide a high quality environment with positive public realm and strong, legible connections and high quality architectural and landscape design, therefore development of the Site should improve on the current situation although it is not likely to be considered a significant effect.

Cultural Heritage/Archaeology

A search of Historic England's mapping resource identifies that the site and surrounding lands are not subject to designation or protection for their archaeological or cultural heritage interests. There are a number of listed buildings present on the northern side of Broadbridge Heath and to the south along Old Wickhurst Lane, however these are distanced from the site. Although the Sustainability Appraisal for the Local Plan policy of developing the Broadbridge Heath Quadrant identified the potential for minor adverse effects on the listed properties on the northern side of Broadbridge Heath, this was based on development of the wider area as a whole. Considering the nature and scale of the Proposed Development, with low-rise buildings proposed for the site, the setting of these listed properties is not considered likely to be affected, and therefore impacts are unlikely to be significant.

As the Proposed Development is located on a brownfield site that has been extensively developed, it is unlikely that the site will support features of cultural heritage or archaeological importance.

⁷ Mitchell-Jones, A. J. (2004) Bat Mitigation Guidelines. January 2004.

⁸ Defra (2021) Multi-Agency Geographic Information for the Countryside. Accessed through <https://magic.defra.gov.uk>



Transport and Access

The Site is currently inaccessible to the public, being used as a road maintenance depot with training facilities and bus storage which are incompatible with public access. Public footpaths are present around the periphery of the site along the northern, western and southern boundary which provide access between Broadbridge Heath to the north, via a surface crossing and sub-way beneath the A281, and the retail park to the north and superstore and leisure facilities to the south. These footpaths will not be impacted upon by the Proposed Development and retained for access to the site.

The local road network surrounding the Proposed Development have seen significant alteration in recent years as part of the South Broadbridge Heath residential development brought forward in the last 5 to 10 years. The A281 to the north has been reduced from a dual carriageway to a single lane carriageway as the main road has been re-routed along the A264 to the south with the A281 along the northern boundary providing access to the retail areas with access further along the A281 beyond the superstore access for buses, taxis and by cycle or foot only.

The A24 has also seen significant alteration to the road layout, with the removal of the off-slip from the A24 to Farthings Hill Roundabout and re-routing via the new A264/A24 roundabout, along with the provision of traffic signalling for the Farthings Hill Roundabout.

The Proposed Development will include access routes via both Wickhurst Lane/A281 on the south-west boundary and with the A264 to the east. The development will provide two traffic routes that both link to the Farthings Hill roundabout, from which access to Horsham and the wider area, via the A24, can be achieved. The Local Plan⁹ identifies that the Broadbridge Heath Quadrant, to which this is part of, should make better provision for connectivity and integration with existing and new communities, with the dual access as part of the Proposed Development providing improved connectivity to the existing retail and leisure provision from the new residential developments. Deliveries will utilise the eastern access road, which is shared with deliveries for the adjacent superstore.

As the infrastructure surrounding the site has been significantly modified to accommodate the additional traffic associated with the surrounding residential developments, in particular associated with the A24/A281 Farthings Hill Roundabout, any environmental effects associated with the additional traffic from the Proposed Development are not anticipated to be significant.

Land Use

The Site is currently owned and operated by West Sussex County Council as a maintenance depot with training facilities and school bus storage, with no community facilities or public access currently to the site. The surrounding area does include areas that are utilised for retail and leisure, with residential and education land uses further afield, however these are not anticipated to be affected by the Proposed Development which will provide further complimentary retail provision in the area.

⁹ Horsham District Council (2015) Horsham District Planning Framework (excluding South Downs National Park). November 2015.



The Horsham District Planning Framework¹⁰ identifies the site as a strategic opportunity for development that further strengthens the position as a successful out of town retail location (Strategic Policy 6: Broadbridge Heath Quadrant). Further to this, the draft Local Plan¹¹ currently being developed retains this strategic development opportunity as a Policy, reflecting the intention for development of this area. Consequently, the Proposed Development aligns with the Local Plan for the Site in bringing the brownfield site into complimentary retail use to the adjoining retail uses.

Land Stability and Climate

The Site is not located within an area that is considered to be susceptible to extreme or adverse climatic conditions that could lead to the project causing environmental problems. The site is not in an area known to be particularly susceptible to severe winds, fog or cause temperature inversions. The site is also not known to be susceptible to subsidence, landslides or erosion.

Cumulative Effects

The principal developments in the local area for which cumulative effects may occur are the West of Horsham residential scheme, which is currently under construction. The South of Broadbridge Heath development is largely completed, and therefore any subsequent effects will be realised as part of baseline assessments supporting the planning application.

Cumulative effects with the West of Horsham scheme will be relatively limited, given the distance between the sites and in comparing the scale of the Proposed Development. Impacts associated with noise or air quality (dust) will be minimal over the distance involved, and traffic impacts will be limited as the highway upgrades delivered have taken the traffic originating from this development into consideration.

Furthermore, the Local Plan identifies the wider Broadbridge Heath Quadrant site as being an important strategic development opportunity in relation to the wider sites identified, with an important relationship to be developed between them that provides a more efficient way of meeting local and wider needs.

Consequently, any cumulative effects arising with surrounding development are not considered likely to be significant.

Transboundary Effects

Due to the nature and scale of the Proposed Development, transboundary effects are not considered likely to occur.

Conclusion of EIA Requirement

In consideration of the information discussed above, it is our assessment that whilst the Proposed Development is of sufficient size to qualify as a Schedule 2 development the considerations above indicates that the location is not in an area of particular environmental sensitivity and the nature of the development aligns with the adjoining land uses and is not one that is likely to give rise to significant environmental effects in the proposed location.

¹⁰ Horsham District Council (2015) Horsham District Planning Framework (excluding South Downs National Park). November 2015.

¹¹ Horsham District Council (2020) Horsham District Local Plan 2019 – 2036. Public Consultation (Regulation 18) Version. February 2020.



These findings are aligned with the conclusions presented in the Sustainability Appraisal for the draft Local Plan¹², in which the Broadbridge Heath Quadrant is retained as a strategic development opportunity. Whilst this considers potential redevelopment of the wider site as a whole, the effects of development are largely positive with minor effects possible to the context of listed properties 500 m away from the site, with the scale of the Proposed Development unlikely to affect the setting of these. Potential negative effects are also noted in relation to transport, but of minor significance as a whole, whilst significant potential negative effects arising in relation to health and wellbeing relate to the potential for the loss of leisure facilities which fall outside of this Site.

Consequently, it is our assessment that the Proposed Development **does not constitute an EIA development**. Any negative effects that may arise from the Proposed Development can be adequately controlled through the standard planning documents to support an application.

If you have any queries or require any further information then please do not hesitate to contact myself (thall@hilsonmoran.com) or Chris Birch (cbirch@hilsonmoran.com) on 020 7940 8888.

Yours sincerely,

Tom Hall

Associate Environmental Consultant, Hilson Moran

¹² Horsham District Council (2020) Interim Sustainability Appraisal of Horsham District Local Plan. Regulation 18 Consultation. February 2020.