Horsham District Council Screening Assessment HDC Reference EIA/21/0001

Applicant Reference: Land at Mercer Road, Request for EIA Screening Opinion (26 February 2021)

Development Proposal: Development of 350 residential dwellings, 1ha of commercial development, a car park to serve the railway station, a convenience store, public open space and strategic landscaping.

EIA Regulations	
Is the proposed development listed in Schedule 1?	No
Is the proposed development listed in Schedule 2?	 Yes. The proposal exceeds thresholds of Category 10(b) projects in Column 1 of Schedule 2 of the Regulations. The proposal includes: More than 150 dwellings (350 proposed); The overall area of development exceeds 5 hectares (total development area is 14Ha).
Is the proposed development within or adjacent to a sensitive area as defined in Regulation 2? (SSSI, National Park, property on World Heritage List, Scheduled Ancient Monuments, AONB, SPA or SAC)	

Schedule 3 EIA Regs 2017 – Selection Criteria for Screening Schedule 2 Development

1. Characteristics of Development	Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)	Significance (direct and indirect)
a) Size and design of development (e.g. site area, scale)	The wider site is 14Ha, and comprised two main field of agricultural land, separated by an existing road (Mercer Road). The 'northern' field is smaller in size (measuring around 3Ha), and the 'southern field is much larger (measuring around 11Ha). Mercer Road (which is also a PROW) connects the site from Langhurstwood Road to the east to Warnham railway station to the west, and this road divides the two fields. The railway line marks the western boundary of the southern field. Both fields are largely surrounded by mature vegetation which encloses them and reflects the historic field pattern of the wider area. Within the two fields, hedgerows have separated out a number of internal 'parcels'. Several mature trees are located within the site, including a dense cluster towards the southern end of the southern field. None of the trees within the site (or in close proximity) are formally protected under Tree Preservation Order (TPO). A large Oak trees located towards the eastern boundary of the site (T57) is considered to be a veteran tree and estimated to be around 250 years old. No areas of Ancient Woodland are present on the site, although a designated area is located adjacent to the site's northern boundary. A small watercourse runs in an east-west direction through the 'southern' field, connecting to a small pond near Pondtail Farm. The site is entirely within	No significant and/or residual environmental impacts anticipated

	Flood Zone 1. Several residential dwellings within the 'southern' field are sited adjacent the site boundary – including 'Pondtail Farm' and other dwellings.	
	The site is located adjacent to the North Horsham strategic development site which has planning permission for up to 2,750 dwellings, commercial floorspace, and associated infrastructure including new roads and schools (DC/16/1677). The site is located closest to 'Phase 3' of this development site, which is programmed to be developed last, and is not likely to be completed until around 2031. The development of 'Phase 1' of the North Horsham site (including the secondary school building) has commenced but no dwellings have been built yet.	
	A brickworks, and waste processing and landfill site (operated by Britaniacrest Recycling) is located to the immediate north of the 'northern' field, and planning permission has recently been granted (on appeal) for a waste incinerator to be erected on this site (WSCC/015/18/NH).	
	The built-up Area Boundary of Horsham is located to the south of the site, on the southern side of the A264.	
	The proposed development would provide up to 350 residential dwellings and 1Ha of commercial land. The proposed development includes the retention of the existing boundary vegetation with additional planting and landscaping provision throughout the site. The vehicular access into the proposed development would be taken from Mercer Road.	
b) accumulation with other existing or approved development	The cumulative impact of development on this site should consider the strategic scale development on land to the immediate east of the site (particularly Phase 3 of the North Horsham development, DC/16/1677), as well as the development of the new waste incinerator to the north of the site (WSCC/015/18/NH) which has not yet commenced. Also of note, is the presence of the existing dual carriageway to the south of the site (A264), and the existing built-up area boundary of Horsham to the south of the road, which is dominated by residential development (circa 25 years old).	
	The key issues for large scale housing developments are the physical scale of such developments and the potential increase in traffic emissions and noise. The site is 14ha in area and the proposed development will provide up to 350 residential dwellings. The cumulative total of residential dwellings, when considering the proposed development (350) and the number of dwellings already approved in the North Horsham site (up to 2,750 across 3 Phases), would exceed 3,000 dwellings, however it is acknowledged that this number covers a large area of land.	

As part of the early assessment process for the North of Horsham strategic development (and as part of the Outline planning application), an Environmental Statement (ES) was prepared which considered the likely significant environmental effects resulting from the 2,750 home development. The ES included technical chapters on various topics, and assessed the potential impacts and level of significance which that particular matter would have on the receiving environment (both during construction and operational stages).	
In summary, the ES concluded that as a result of additional mitigation measures and appropriate masterplanning/scheme design, the identified environmental effects would not be significantly adverse, and in some cases, would lead to betterment.	
It is considered therefore, that provided the proposed development of 350 homes at Mercer Road is sensitively masterplanned (including appropriate mitigation as necessary), and proposed to come forward within a timescale that does not overlap with Phase 3 of the North Horsham development; then it is unlikely to have a significant impact on the environment that would warrant the submission of a separate Environmental Statement.	
The applicant has indicated that the development could commence in 2023, with completion in 2027. As such, this is not likely to overlap with the development of Phase 3 of the North Horsham site, which is not due to commence until 2028/29.	
It is noted that the applicant has not yet provided sufficient detail regarding the traffic impact of the proposal, either in isolation, or in combination with the anticipated traffic movements resulting from the North Horsham development. As such, anticipated trip rates and junction capacity is unknown. Junction improvements along the A264 have already been approved in connection with the North Horsham development (including introducing signals to the existing Great Daux Roundabout), but it is not yet known whether the added traffic generated form the development of 350 additional dwellings (and 1Ha of commercial land) on this site will require further road/junction upgrades or improvements. Notwithstanding this, with appropriate mitigation and/or highways works to improve junction capacity it is considered that the traffic generated by the development can be managed appropriately in order to avoid significant environmental impacts.	
A PROW (ROW1574) already runs along Mercer Road, so the site is accessible to the existing wider PRoW network, linking the site to Warnham to the west (including good access to Warnham Station), and into the North Horsham development to the east. This link will be retained.	

c) use of natural resources, in particular soil, water and biodiversity (e.g. land, water, materials, energy – non renewable or in short supply?)	The proposed construction and operational phases of the proposed development will use resources in terms of land, water and energy as would be expected for a residential development for up to 350 dwellings. The Council can require the applicant to include measures in the CEMP to minimise the consumption of natural resources. The future operation of the development is not anticipated to use these resources, unless maintenance of the buildings and associated infrastructure (means of access, communal areas, and SuDs) is required.	No significant and/or residual environmental impacts anticipated
d) production of waste (e.g. demolition, construction, operation and decommissioning?)	As with nearly all construction, the proposed development will result in waste materials from the preparation and undertaking of works. The applicant will be encouraged to ensure that construction waste is reused and recycled where possible. Construction waste would be managed in accordance with all applicable legislation and disposed of in line with best practice. Operational waste would be disposed of in line with HDC requirements and managed in accordance with all applicable legislation.	No significant and/or residual environmental impacts anticipated
e) pollution and nuisances (e.g. potential for noise, dust, vibration, light, odours, production of substances / emissions which may damage environment -construction, operation and decommissioning)	During the construction phase there is likely potential for effects to arise from building works, in terms of noise and vibration, traffic disturbance and any dust from site preparation/ground works. Any impact will be local to the site area and its immediately locality. Any impact will be short-term and temporary, and can be mitigated through adherence to a Construction Management Plan providing for noise and dust suppression measures (the submission, approval and implementation of which can be secured by a planning condition). The site layout for construction works has the capacity to be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible. There may be some minor adverse impacts on habitat within the scheme, which will be minimised through sensitive masterplanning. Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction and use of the highways improvements once completed. A CEMP, to be agreed with HDC and secured through a suitable planning condition, can be submitted in support of the planning application to ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers. There would also be emissions associated with the operational phase of the proposed development. As the development is residential in nature (with some commercial), emissions would mainly be associated with the number of vehicles travelling to and from the site as a	No significant and/or residual environmental impacts anticipated

	result of the future residents that will occupy the 350 dwellings on the site, plus the users of the commercial units. The number of traffic movements in currently unknown. The Council would expect the applicant to support any future planning application with a comprehensive Transport Assessment and Travel Plan to demonstrate what the impact will be, and any mitigation measures that will be necessary to reduce impact. The site is located entirely within Flood Zone 1; meaning there is a low probability of river flooding. An area covered by Flood Zones 2 and 3 is located to the western side of the railway line owing to the existence of a watercourse. The effects in relation to surface water and hydrology are expected to be assessed in full in supporting material submitted with a future planning application (including a Surface Water Drainage Strategy, Foul Drainage Scheme, and Flood Zones 2 or 3, and with a suitable drainage strategy and SuDS features (including water attenuation facilities) the resultant effects can be managed appropriately, and are unlikely to be significant.	
f) the risk of major accidents and/or disasters (including those caused by climate change)	During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. All such measures would form part of the CEMP. There are no anticipated significant risks of major accidents and/or disasters, including those caused by climate change, during the operation of the development. The development would adhere to highway safety standards. During the construction phase, certain materials may be present on the site which may be harmful to the environment. The effects in relation to hazardous substances and contamination were assessed by way of supporting material submitted with the planning application and conditions imposed in the event of planning being permitted.	No significant and/or residual environmental impacts anticipated
g) The risks to human health (e.g. due to water contamination or air pollution)	Any associated risks to human health arising from the proposal would be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction of the development. For the operational phase, an appropriate drainage design to prevent contaminants entering waterbodies would be implemented as part of the development. A CEMP can be submitted in support of the planning application to ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers. The site layout for construction works has the capacity to be arranged to ensure that	No significant and/or residual environmental impacts anticipated

machinery and dust causing activities are located as far away from sensitive receptors as	
possible.	

2. Location of Development: the environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular to:	Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)	Significance
a) the existing and approved land use	The principal land use will change from undeveloped agricultural land to land used for residential and commercial purposes. There would be changes to the site during the construction phase as soil would be excavated for foundations, drainage and access.	No significant and/or residual environmental impacts anticipated
b) the relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground (common land use? Quality of land / designations / protected species –	The site comprises Grade 3 Agricultural Land (good/moderate quality) which is classed as 'best and most versatile (BMV) land'. Given the proposed development would not result in the loss of more than 20Ha of BMV land, there is no requirement to consult Natural England on the proposal.	
 would development lead to irreversible loss of key qualities or resources in the area?) c) the absorption capacity of the natural environment. 	There are no TPOs or areas of ancient woodland on the site, however one large Oak tree is considered to be a veteran tree by virtue of its size and age. It would be expected that a comprehensive Tree Survey and Arboricultural Report would be submitted with a future planning application. A landscape strategy would also be required to be submitted with a planning application.	
	An area of designated ancient woodland is located adjacent to the site's northern boundary, therefore any development within the northern section of the site would be required to maintain a minimum 15m separation distance/buffer in order to protect the protected area.	
	There is an existing pond located close to Pondtail Farm (towards the eastern boundary of the 'southern' field), but it is unclear whether this will be retained as part of the proposed development.	
	It is possible for the PRoW along Mercer Road to remain accessible to the public during construction. During construction, potential adverse effects to the quality of surface and ground water, roads and air (including airborne noise) can be minimised through the implementation of the CEMP. Such effects will be temporary.	

	Once operational, the proposed development can include landscaping, tree planting, areas of new green open space, and an enhanced landscape buffer between the proposed development and the existing boundary vegetation. Further details can be included in the landscape strategy which will be submitted with a future planning application.	
i) wetlands, riparian areas, river mouths (e.g. floodplains, impacts on drainage, aquifers)	The site falls within Flood Zone 1 (at a low risk of flooding from rivers), with small areas that are susceptible to surface water flooding. There is a small watercourse running east-west through the southern end of the site, and a small pond located near the eastern boundary of the southern field of the site. The site is not located within or adjacent to any groundwater SPZ. A Flood Risk Assessment can be provided with a future planning application.	No significant and/or residual environmental impacts anticipated and mitigated
ii) coastal zones and marine environments (any potential for the scheme to impact on coastal areas e.g. runoff etc)	N/A	N/A
iii) mountain and forest areas (<i>impacts on wooded areas, including</i> <i>any designated areas of ancient</i> <i>woodland / TPOs</i>).	Small sections of hedgerow and trees are likely to be removed for access and internal roads. There are no TPOs or areas of ancient woodland on the site, however there is one Oak tree that is considered to be a veteran tree. A Tree Survey and Arboricultural Report can be submitted with a future planning application. In addition, the proposed development will include areas of new landscape planting, including native shrubs. A landscape strategy can be submitted with a future planning application. The designated area of ancient woodland located adjacent to the site's northern boundary will require a minimum 15m buffer between its boundary and any new development.	No significant and/or residual environmental impacts anticipated
iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)	No areas designated as National Parks or SACs/SSSIs are located within 15km of the site. The western boundary of the High Weald AONB lies approximately 2.6km form the site. Due to the distance, and lack of any visibility, it is not thought that development on this site will have a significant impact on the AONB. Development of this site is unlikely to have an impact on the nearest national park (South Downs National Park) or as the site lies outside of the Bat Sustenance Zone for Barbastelle bats, any impact on the bat flightpaths to/from the Mens SAC will be very limited.	No significant and/or residual environmental impacts anticipated
	The submitted PEA notes that Warnham Local Nature Reserve and Warnham Site of Special Scientific Interest (a geological SSSI) and two Local Wildlife Sites were identified within 2km of the site; Brockhurst Wood & Gill & Morris's Wood Local Wildlife Site (LWS) lies approximately 800m northeast, and Warnham Mill Pond LWS, approximately 170m south. The recommendations in the PEA to retain existing woodland and connected hedgerows in the north will help to maintain connectivity with Brockhurst Wood & Gill & Morris's Wood. As	

	such, no significant environmental effects of the proposed development on designated nature sites are anticipated.	
v) European sites and other areas classified or protected under national legislation (this includes areas designated pursuant to <u>Directive</u> <u>79/409/EEC</u> (conservation of wild birds) and <u>Directive 92/43/EEC</u> (conservation of habitats and fauna and SSSI's) (In particular the Arun valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European protected species present that can be affected?)	The site is located outside any designated Bat Sustenance Zones. However, as identified in the PEA, a low number of Barbastelle bats (Annex II species) were recorded between the site and Greyland Copse in 2015 and 2016 as part of the survey work done for the North Horsham development. Further survey work to determine if the roost is still in use by Barbastelle bats will therefore be required, but this is not thought to result in a significant impact on the bat habitat. It is considered reasonable for appropriate ecology conditions to be imposed on any future development to preserved identified habitats. An HRA Appropriate Assessment screening may be required on this proposal. A planning application will be supported by an Ecology Assessment and appropriate surveying. In addition, a Phase 1 Habitat Survey can be submitted with the planning application. Best practice ecological mitigation measures can be implemented to include using tree protection during construction and undertaking scrub/vegetation removal outside of the bird breeding season to avoid the potential for damaging bird nests. Pond surveys from 2017 did not record any Great Crested Newts on site. However, as a precautionary approach, avoidance measures can be secured by condition of any future planning consent. The submitted PEA notes that the nearby Ancient Woodland to the north, and hedgerows on the eastern and western boundaries provide suitable habitat for Dormice. Dormice surveys were undertaken in 2017 and 2018 and no evidence of their presence was found. As such, it is unlikely that any development on this site will have a significant impact on this European Protected Species.	No significant and/or residual environmental impacts anticipated
vi) areas in which there has already been a failure to meet environmental quality standards laid down in Union legislation or in which it is considered that these is such a failure (any areas already subject to pollution or damage – include impact on any AQMAs).	There are no AQMAs in the vicinity of the site. Dust generation during the construction phase would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. The site layout has the capacity for construction works will be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible.	No significant and/or residual environmental impacts anticipated
vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment	Warnham Railway Station is located approximately 100m to the west of the site. The nearest bus stops are located within the built-up area boundary of Horsham (to the south of the A264), the nearest one being around 500m away from the application site (routes 61 and 89,	No significant and/or residual environmental impacts anticipated

etc)	Pondtail Road). Residential properties and facilities including two primary schools, a church, a pub, a sports club, shops (including post office), hairdressers, and a take-away are located along North Heath Lane which is approximately 1km form the application site. Other facilities and employment opportunities are located in Horsham Town Centre which is located approximately 3km from the site.	
viii) landscapes of historical, cultural or archaeological significance	A Scheduled Monument (Ancient Monument list entry number 1010500 Moated Site, 200m west of Graylands Copse) is located around 200m to the north-eats of the 'northern' field of the development site, on the opposite side of Langhurstwood Road. This site also comprises an Archaeological Notification Area. The Scheduled Monument feature is located within the site boundary of the approved North Horsham development. There are no Registered Parks and Gardens within 5km of the site. The site is not located within a Conservation Area, nor are there any listed buildings on the site or nearby.	No significant and/or residual environmental impacts anticipated
3. Types and Characteristics of the potential impact: The potential significant effects of development must be considered in relation to criteria set out under 1 & 2, having particular regard to:	Description	Significance
a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)	The impacts are largely confined to the site and the land immediately adjacent, including the A264 dual carriageway to the south. Residents closest to the site will be affected by the development during the construction phase, however, adverse effects would be temporary and minimised through the implementation of a CEMP.	No significant and/or residual environmental impacts anticipated
b) the nature of the impact	The development has the potential to lead to impacts on landscape character, landscape resources and visual amenity. In terms of visual amenity, there are currently locations where the likely visual impact can be assessed. As a result of the development, there would be an increase in HGV construction traffic movements; increase in noise, particularly during site construction.	No significant and/or residual environmental impacts anticipated
c) the transboundary nature of the impact (any international impacts?)	None	N/a
d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)	The impact of development of this site for 350 homes and 1Ha commercial land is likely to be felt initially by those in the immediate surrounds. However, given the strategic scale development to the east (North Horsham) has already been granted planning approval, once development here comes to fruition, the context of the wider site character will change, and	No significant and/or residual environmental impacts anticipated

	development on this site is likely to complement the adjacent site. At this stage, an assessment of the impact is difficult to judge as the applicant has not provided a full suite of supporting information (i.e. traffic impacts etc), nor has the development of the North Horsham site progressed that far. An assessment of the impact is made more complex owing to the planned timing of Phase 3 of the North Horsham development, which is not expected to be completed until 2031.	
	As a whole however, the residential/commercial development of this site is not likely to significantly change the wider environmental conditions, and such a development would not be considered unusual in the context.	
	The specific impacts will be assessed in full at planning application stage, where any necessary mitigation can be sought.	
e) the probability of the impact (e.g. overall probability of impacts identified above)	The probability of the above impacts identified above is high (i.e. impact on landscape character etc), and the anticipated effects of the proposed development can be clearly established with reasonable confidence.	No significant and/or residual environmental impacts anticipated
	Mitigation measures at planning application stage can be used to appropriately manage impacts arising from the development (plus any cumulative impact that may arise owing to the adjacent strategic development).	
f) the expected onset, duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)	Construction effects would be temporary and short term in duration, and the operational effects would be permanent and long term. Development is likely to commence following planning approval and the discharge of any pre-commencement conditions attached to the planning permission (within 3 years of the permission). Construction impacts would be intermittent and reversible. Operation impacts would be continuous and irreversible.	No significant and/or residual environmental impacts anticipated
g) the accumulation of the impact with the impact of other existing and/or approved development	Elements such as cumulative highway effects of the dwellings/commercial land yet to be completed/commenced (at the North Horsham site, and in relation to the incinerator at the Britaniacrest site), alongside the proposed dwellings and commercial land of this proposal, will be assessed as part of a full Transport Assessment, which is expected to be submitted alongside a future planning application. This consented scheme at North Horsham has its own required mitigation measures to address any adverse effects.	No significant and/or residual environmental impacts anticipated
	From the Environment Statement (ES) that accompanied outline planning permission for the North Horsham site (DC/16/1677), the vast majority of mitigation measures were incorporated within the detailed design of the proposed development. This includes demolition/construction	

	mitigation through a site-wide CEMP which has been secured and which will help minimise adverse amenity and air quality effects. The technical chapters within the North Horsham ES discuss matters such as transport and air quality impacts. In summary, with regard to transport impact, the ES concluded that the new transport infrastructure to be provided to support the development would not result in significant environmental impact, with certain infrastructure improvements resulting in major beneficial effects. With regard to air quality impacts, the ES concluded that any adverse air quality impacts from construction (such as dust etc) can be suitably controlled through a construction management plan. Similarly, the air quality effects of road traffic are not considered to be significant for human health receptors. As a whole, it is considered that the mitigation measures secured for the North Horsham development will not be affected by the proposed development of 350 homes at Mercer Road is sensitively masterplanned (including appropriate mitigation as necessary), and proposed to come forward within a timescale that does not overlap with Phase 3 of the North Horsham development (the applicant has advised it would come forward ahead of Phase 3); then it is unlikely to have a significant impact on the environment that would warrant the submission of a separate Environmental Statement.	
h) the possibility of effectively reducing the impact	During the construction phase, adverse effects would be temporary and minimised through the implementation of a CEMP and best practice measures. Various studies and statements are expected to be submitted with a future planning application to ensure the provision of appropriate mitigation on site. The Council will expect the applicant to ensure that measures to reduce the impact of the proposal on climate change, visual and landscape impacts, and ecology will be integrated into the proposals where possible, such as through the orientation of the buildings and energy and water efficiency. An Appropriate Assessment HRA screening may be required on this proposal. A planning application will be expected to be supported by an Ecology Assessment and appropriate species surveys. Legal agreement and conditions would be imposed to secure the provision of any appropriate mitigation.	No significant and/or residual environmental impacts anticipated

Results	of	any	relevant	EU	None applicable	
environm	ental	asses	sment that	t is		
reasonab	ly ava	ilable				

Conclusion

EIA Required?	No
Statement of reasons	Whilst the thresholds outlined in Schedule 2 of the EIA regs. (2017) for overall site area and dwelling numbers is exceeded by the proposal (14Ha and 350 units respectively); the environmental effects of the proposed development as a whole are not considered to be significant enough to have a detrimental effect on the environment, even when considered in combination with existing and approved development in the locale (including in particular, the approved North Horsham strategic scale development to the east of the site).
	It is acknowledged that as a result of development on this site, there would be some impact on natural resources including biodiversity, and the production of waste and pollution during the construction phases; however, with appropriate mitigation secured through planning conditions and/or a legal agreement where necessary, these impacts are considered to not be significant. In addition, it is acknowledge that an additional 350 dwellings (and commercial floorspace) on this site, in combination with the North Horsham development, is likely to result in an increase in vehicle trips (therefore an impact on highways capacity). The full extent of this impact is not yet known, but it is considered that it could be full assessed with application stage, and any additional mitigation (above that already secured for the North Horsham development) could be secured at application stage.
	The proposed development, when considered cumulatively with the approved North Horsham development (Outline approval reference DC/16/1677), would result in the development of over 3,000 residential dwellings, however it is acknowledged that this number of units would be built across a large area of land amounting to around 265Ha. The Outline approval DC/16/1677 was subject to EIA, and from the Environmental Statement (ES) that accompanied the Outline EIA, the vast majority of Environmental Impact mitigation measures are proposed to be incorporated within the detailed design of the proposed development. It is not considered that the development of the Mercer Road site would have a significant impact on the delivery of these mitigation measures, and if the site can be appropriately masterplanned (to include additional mitigation where necessary), it should not lead to any additional adverse impacts on the receiving environment. The applicant has noted that the development of the site is projected to be completed before Phase 3 of the North Horsham development commences, which would prevent any overlap in construction, thereby minimising associated impacts this may bring.
	The screening assessment for this proposal has identified that the vast majority of impacts on the environment could be similarly addressed with mitigation measures incorporated within the design of the proposed development, and that significant effects are not considered likely, either alone or in combination with other development. The proposals would be of a sufficiently manageable scale that effects could be managed in accordance with standard methods. The proposed

	development is therefore not considered to be formal EIA development as defined by the EIA Regulations.
	It is therefore considered that, whilst the development is Schedule 2 development, it has been demonstrated that the proposed development will be unlikely to cause significant environment effects, and in this case, EIA is not required.
Date	Angela Moore 12 April 2021