

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

Our ref: EIA/21/0006

Your ref:

Date 08/12//2021

Dear Mr Frisby

RE: Erection of 235 dwellings (35% affordable) along with access, landscaping and Nature Reserve at Parsonage Farm Henfield BN5 9QR – Application for EIA Screening Opinion under Regulation 6 of the Town and Country Planning Environmental Impact Assessment) Regulations 2017.

I refer to your letter dated the 27 August 2021 requesting that the Council provide a formal Screening Opinion to determine whether an Environmental Impact Assessment (EIA) is required in respect of the planning application for the proposed erection of 235 dwellings (35% affordable) along with access, landscaping and Nature Reserve at Parsonage Farm Henfield BN5 9QR

Following a review of the information provided, this Council consider the proposals to fall under Schedule 2 of the EIA Regulations, item 10b (Urban Development Projects). The proposal exceeds the criteria outlined in Schedule 2 of the Regulations, and is therefore necessary to consider whether the development would be likely to have significant effects on the environment. In making this assessment the Council has taken into account Schedule 3 of the EIA regulations paying attention to the development characteristics, location and nature of the impacts. The results of this assessment are included with this letter for information. When forming this Screening Opinion, the Council has drawn on information set out in the Screening Request and other available guidance.

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, as well as the proposed development being able to demonstrate water neutrality.

There will be an increase of vehicles accessing the site during the demolition and construction phases, particularly HGVs. HGVs will access the site during operation phase as well. The traffic impacts of the Proposed Development will be need to be carefully managed, to limit the impact of the vehicles on the surrounding transport network so that any impacts and resultant effects upon receptors that do occur are not significant. This could include routing movements during off-peak travel hours and a just-in-time delivery system on site to avoid the potential for off-site queuing.

Noise arising from the Proposed Development during its operation has the potential to result in adverse effects to existing noise sensitive receptors. Noise will need to be assessed according to the relevant standard (which is British Standard BS4142) and mitigation measures (such as screening or restrictions on certain activities at particular times) may be used to ensure that

noise levels at nearby noise sensitive receptors either do not result in any adverse effects or are mitigated and minimised so far as is reasonable, in accordance with Planning and Noise Policy requirements.

Details of the assessment, including baseline survey data, predicted levels and mitigation measures would be provided within a noise impact assessment submitted with the planning application.

Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone. This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. The Council has received a Position Statement (attached) from Natural England which states that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that development within this zone (in effect all of Horsham District) must not add to this impact. The Position Statement is a new material consideration and the consequence of this is that Horsham District Council is unable to determine current planning applications positively unless it can be demonstrated they are 'water neutral'. Failure to achieve water neutrality would result in development conflicting with s.63 of the Conservation of Habitats and Species Regulations 2017.

Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. Allied to providing water efficiency measures within the development there are therefore known options to potentially offset water usage on and off site. Such options are capable of being developed into a water neutrality strategy sufficient to pass Appropriate Assessment and therefore avoid adverse impacts on the Arun Valley. In the event the strategy is insufficient to pass Appropriate Assessment, it would not be possible to reasonably grant permission contrary to the Habitat Regulations. Subject therefore to the submission of a water neutrality strategy to be secured either by condition or legal agreement, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.

In summary, the screening assessment of the current pre-application 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/or offsetting mitigation, and that significant effects are not considered likely either alone or in combination with other development. The proposals would be of a sufficiently limited scale that effects could be managed in accordance with standard methods.

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 proposed development will be unlikely to cause significant environmental effects, and in this case, EIA is not required.

I confirm that this letter forms Horsham District Council's formal screening opinion and will be placed on the public register.

Yours sincerely,

Amanda Wilkes
Senior Planning Officer