

7 June 2019

Delivered by email

Development Management Team
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Ref: INSR3001

Dear Sir / Madam,

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATION 2017:
REQUEST FOR SCREENING OPINION PURSUANT TO REGULATION 5**

**PROPOSED CARE RETIREMENT COMMUNITY DEVELOPMENT, LAND AT WELLCROSS FARM, SLINFOLD,
HORSHAM, RH13 0TP**

I write on behalf of our client, Inspired Villages Group (hereafter referred to as 'IVG'), to formally request a Screening Opinion pursuant to Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter known as the 'Regulations') in relation to the proposed care retirement community development at Land at Wellcross Farm, Slinfold, Horsham.

Regulation 6(2) of the Regulations advises that a request for a Screening Opinion must be accompanied by:

- A Plan sufficient to identify the land;
- A description of the development, including in particular
 - i. A description of the physical characteristics of the development, and, where relevant, of demolition works;
 - ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
- A description of the aspects of the environment likely to be significantly affected by the development;

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- To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from –
 - i. The expected residues and emissions and the production of waste, where relevant; and
 - ii. The use of natural resources, in particular soil, land, water and biodiversity; and
- Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

In accordance with Regulation 6(2) a Site Location Plan is included with this letter, and this letter sets out a brief description of the nature and purposes of the proposed development and its possible effects on the environment.

The Regulations implement the requirements of the European Community's Directive on Environment Assessment (85/337/EEC), as amended by the Council Directive No. 97/11/EC, 2011/92/EU and 2014/52/EU. Further guidance is provided in the National Planning Practice Guidance (NPPG).

This request relates to the proposed development of Land at Wellcross Farm, Horsham. IVG proposes to develop the site as a continuing care retirement community via C2 planning use, proposing up to 150 apartments, incorporating on-site facilities including a restaurant/café, spa, and wellness centre. The site consists primarily of an 'L' shape and covers an area of 7.6 hectares.

The extent of the site that this request relates to is defined on the Site Location Plan at Appendix 1. This letter describes the circumstances of the site and proposed development.

BACKGROUND

The site is located within the Parish of Itchingfield. The Site is located outside of the built-up area boundary of Horsham, however it is located in close proximity to this built-up area.

The site consists primarily of an 'L' shaped area of open farmland, currently used for horse paddocks. To the north east of the site lies the River Arun. To the south lies an existing care home, Wellcross Grange and Kerwin Court Brain Injury Rehabilitation Trust (BIRT). A Southern Water pumping station lies within the site and is to be retained.

The site benefits from good road links, with direct access on to the A24 from the A264 linking to the M25 and London to the north and Worthing and Brighton to the south. The A264 also provides easy access to Crawley to the north east.

The Council's Online Proposals Map identifies no major planning constraints associated with the site. The Government's Flood Map for Planning identifies that the majority of the site falls within Flood Zone 1, with the eastern extent falling within Flood Zones 2 & 3.

A review of the Online Planning Register indicated that there are no relevant planning applications on the site itself or in the immediate surroundings of the site.

DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposal seeks to develop the site as a continuing care retirement community via a C2 planning use, proposing up to 150 apartments, incorporating on-site facilities including a restaurant/café, spa and wellness centre. This will ensure that a large part of residents' everyday needs would be catered for onsite. The facilities are also available to the wider community.

The main community building will be located within the northern area of the site. Across the remainder of the site, separate accommodation blocks and parking will be developed, linked by access/service roads and footways. Access to and egress from the site will be achieved from the A264. The proposals include the provision of new pedestrian links. A new crossing will also provide access to existing public transport services along Lyons Road.

DETERMINING WHETHER ENVIRONMENTAL IMPACT ASSESSMENT (EIA) IS REQUIRED

In accordance with the Regulations the determination of whether EIA is needed requires consideration as to whether the development is:

- Schedule 1 development – in which case EIA is mandatory; or
- Schedule 2 development – in which case EIA is necessary if the development is likely to have significant environmental effects (guidance on assessing whether a development would have significant environmental effects is contained in Schedule 3 of the Regulations).

The development does not meet any of these categories of development in Schedule 1 of the Regulations. It does, however, fall within the description of development of category 10(b) projects in Column 1 of Schedule 2 of the Regulations.

By the way of background, the NPPG provides indicative criteria and thresholds for when EIA may be required for Category 10(b) projects. The relevant thresholds are:

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

Therefore as the development includes more than 1 hectare of urban development (Net developable area of 3.52ha), as per Category 10(b)(i), the likelihood of significant environment affects being caused and a result of the development must be evaluated.

SENSITIVE AREAS

Sensitive areas are set out within Regulation 2(1) and can be broadly summarised as:

- Sites of Special Scientific Interest (SSSI);
- National Parks;
- The Broads;

- World Heritage Sites;
- Scheduled Monuments;
- Areas of Outstanding Natural Beauty (AONB); and
- A European site.

The site is not within an AONB, the Broads, or a National Park, it is not a World Heritage Site and there are no Scheduled Monuments within the site or in the immediate vicinity of the site.

There are no statutory designated heritage sites within or adjacent to the site. The nearest listed building is Lyons Farm House, a Grade II Listed Building approximately 150m away from the site.

There are no statutory designated sites of nature conservation within or adjacent to the site. The nearest SSSI is Slinfold Stream and Quarry SSSI which is located approximately 1.3 km to the north west of the site. Other statutorily designated sites nearby include the Warnham Local Nature Reserve (approximately 3km to the north east of the site) and Warnham SSSI (approximately 5.4km to the north east of the site).

The nearest European Protected Sites are the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC). The site is located within the 15km zone of influence, to the south east of the SAC and SPA.

An assessment is more likely to be required if the project affects the features for which the sensitive area was designated. However, it does not follow that every Schedule 2 development in (or affecting) these areas will automatically require an assessment. It will be necessary to judge whether the likely effects on the environment of that particular development will be significant in that particular location.

POTENTIAL SIGNIFICANT ENVIRONMENTAL EFFECTS ON THE ENVIRONMENT

The criteria for assessment of potential effects are set out at Schedule 3 of the Regulations and can be broadly summarised as follows:

1. The characteristics of the development (i.e. its size, cumulation with other existing development and/or approved development, use of natural resources, quantities of pollution and waste generated);
2. The location of the development (i.e. the existing use and the environmental sensitivity of the location); and
3. Types and characteristics of the potential impact of development (i.e. extent of any impact, its magnitude and its duration or frequency).

Since the development (as described above) is of a type described in Schedule 2 of the EIA Regulations, Schedule 3 of the EIA Regulations has been considered, the findings of which are presented below.

CHARACTERISTICS AND LOCATION OF THE DEVELOPMENT

The development proposal comprises a continuing care retirement community on the 7.6 ha site. The site is considered to be in a highly sustainable location, in close proximity to the existing built-up area boundary of Horsham with its wide-ranging local amenities. Horsham Town Centre boundary is situated approximately 2.7km to the east of the site and offers an extensive range of services and amenities and transport nodes.

A continuing care retirement community on the site will not result in any significant emissions or waste or involve processes that will introduce new or different types of environmental effects to the area. The proposals would not have a materially adverse impact on natural resources in the area and therefore should not require an EIA on this basis. The proposed development is not anticipated to lead to the contamination of land or water.

Potential impacts of the development are discussed below and will be robustly assessed as part of the planning application process with measures defined where necessary to mitigate any adverse impacts arising.

CHARACTERISTICS OF THE POTENTIAL IMPACTS

The development proposal of a continuing care retirement community is considered appropriate given the site abuts the built-up area of Horsham.

The development is similar in nature to the surrounding land uses and will not have any complex, hazardous or significant environmental effects that would otherwise indicate that the area is no suitable for this type of development in environmental terms.

CONSTRUCTION

During the construction phase there is potential for effects to arise from building works, in terms of chicle noise and vibration, traffic disturbance and any dust from site preparation/ground works. Any impact will, however, be local to the site area and its immediate locality. Any impact will also be short-term and temporary and, in any event, 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).

On this basis, no significant and/or residual environmental impacts are anticipated from the construction of the development.

ECOLOGY

Regarding habitats, the site was subject to a Preliminary Ecological Appraisal in November 2018. The habitats on-site were generally considered to be of low-ecological value comprising grazed pasture. However, areas of woodland and hedgerows would be classified as Priority Habitats and the River Arun runs through the site. Small areas of woodland and river will be affected to make way for a footbridge/access and that some small sections of hedgerow are likely to be removed. However, significant areas will be retained and enhanced through new planting and appropriate future management. A significant area of wetland including ponds will also be created enhancing the existing ecology on-site. The environmental impacts of the scheme on habitats are therefore not considered to be significant.

Bat species may use the areas of woodland for foraging and commuting. However, this is largely being retained and a sensitive lighting scheme will be implemented in-line with the latest Bat Conservation Trust guidelines to limit disturbance to these species. Furthermore, habitat creation and enhancement within the wetland area will increase foraging opportunities for bats.

Reptiles were considered unlikely to be affected by the works due to the lack of desk study records and the largely sub-optimal nature of the habitats to be affected by the works.

Great Crested Newts are known to be present within 500m of the site within receptor ponds associated with an unrelated development. These ponds are located east of the river and therefore the majority of the development will not impact on GCN. Suitable avoidance measures, including a European Protected Species Mitigation Licence if appropriate, will be implemented to ensure this species is protected during the works. The additional ponds to be created in the wetland areas will enhance the value of the site to amphibians.

A range of bird species are likely to nest within the woodland habitat on-site. However, the majority of this habitat is to be retained and additional nesting opportunities are to be incorporated into the final design in the form of bird boxes.

Further detailed faunal surveys are currently being undertaken i.e. dormice, otter and water vole surveys to be completed in August 2019, with these results informing the impact analysis, the mitigation and enhancement package and hence, scheme design.

Full details on all faunal impacts and those measures which will not only mitigate losses but deliver net benefits would be included within documentation submitted in support of the planning application. The environmental impacts of the scheme on faunal species are not considered to be significant.

There was a single statutory designated site within 2km of the site. Slinfold Stream and Quarry Site of Special Scientific Interest (SSSI) is a geological site located approximately 1.3km northwest of the site. The site is also within the SSSI Risk Zone, but the development type was not included within a risk category. As a result of the distance of the site from designated sites and the nature of the works, no direct or indirect impacts are envisaged to any wildlife sites.

In summary, there is considered to be ample scope to fully mitigate all potential adverse ecological impacts arising from the emerging proposals and additionally, to deliver overall net gains for biodiversity. No significant ecological related environmental effects are therefore envisaged.

HERITAGE

This site does not lie within a Conservation Area and the nearest listed building is Lyons Farm House, a Grade II Listed Building approximately 150m away from the site. As such it is not considered that development is likely to have significant effects on the character or setting of any heritage assets.

HIGHWAYS

DHA are the appointed highways consultants on this project. The nature of this bespoke continuing care retirement community is such that the proposals are not expected to result in significant traffic growth over what is already on the local highway network. This conclusion is reached for a number of reasons following analysis by DHA of similar developments managed by the same Client:-

- Firstly, the development will be aimed at post-retirement age residents, many of whom may have already chosen to stop using their own vehicles as a main transportation choice. As the development becomes more established, car usage will also reduce as the residents get older or require more substantial care.
- Secondly, many of the future residents of the development may already live locally, choosing to retire to a community that offers care services in their area. They would therefore be active on the highway network in any event.
- Thirdly, it is likely that resident arrival/departure times for the care community will be outside of the conventional morning and evening peak periods, with the majority of residents choosing to travel at quieter times for leisure and shopping purposes only.
- Fourthly, the applicant proposes to operate a community bus or taxi service using electric vehicles. This will ensure that many vehicle movements are “shared”. In addition, further travel reduction measures are proposed. These will include provision of on-site facilities such as a Wellness Centre and Restaurant/Café, which will reduce trips to other facilities in the local area.

The site has been assessed as producing approximately 465 vehicle trips daily. During the AM and PM peak hours, approximately 26-28 vehicle trips are forecast, or around one every two minutes on average. However, these figures make no allowance for the likely mitigation measures to be implemented, including resident bus or taxi services to nearby attractions. Residents of the site would likely choose to use the services provided over their own transportation, thereby reducing trip rates through shared journeys.

The most recent (November 2017) traffic survey data available for the A264 Five Oaks Road has been provided by West Sussex County Council for site 00005038 - located close to the garage opposite the existing site entrance. This survey data provides average seven-day, two way vehicle flows of 15,314 per day. The proposed development trip generation as a proportion of that traffic flow represents a 3.0% increase. IEMA Guidelines for the environmental assessment of road traffic state that increases in traffic flows of less than 30% (or 10% in sensitive areas) are considered to result in negligible effects.

Traffic associated with the proposed development would therefore be low in this context and given the likely dispersion across the wider road network on leaving the site, substantially less than this on the surrounding highway network. No significant traffic or transport related environmental effects are therefore envisaged.

FLOOD RISK AND DRAINAGE

The application boundary includes areas within Flood Zones 1, 2 & 3 (Low, Medium and High Probability of fluvial flooding). Further scoping has identified the true extent of potential flooding within the site, including an allowance for climate change and the buildings proposed to provide residential accommodation have been located outside the reach of the most extreme extents.

The site is generally at a low risk of flooding from all other sources when the mapped fluvial flood extents are taken into account. Some residual risk exists in the form of surface and groundwater flooding, however simple mitigation measures such as forming external levels towards drainage features would be sufficient to manage this and as such no significant effects are anticipated in respect of flood risk.

An existing drainage regime of natural infiltration and runoff exists with surface water runoff directed towards the River Arun at the eastern site boundary. A connection to this location would be maintained post development with attenuation provided in order to mimic the existing situation with the potential for a moderate beneficial impact in more extreme storms.

External levels will be carefully designed in co-ordination with Landscape constraints in order to minimise the amount of material that will need to be removed from site by aiming to achieve a cut/fill balance, and incorporating sustainable drainage features which will provide treatment to runoff.

Foul water will be connected to the most appropriate point within the local network, which is adopted by Southern Water who have an obligation to accommodate flows from new developments and provide additional capacity. As such no significant impacts are expected in respect of the drainage scheme.

The application will be accompanied by a Flood Risk Assessment and a Sustainable Drainage Statement which will provide further contextual evidence to support the above.

LANDSCAPE

The proposed development has the potential to lead to impacts on landscape character, landscape resources and visual amenity. A preliminary landscape appraisal has been carried out. Its findings are that:

- In terms of landscape character, overall the proposals will bring about a minor loss or alteration to a small number of key characteristics of the identified landscape type. Taken overall the proposed elements will not be uncharacteristic when set within the attributes of the existing landscape.
- In terms of landscape resources, the potential impacts on topography, landform, vegetation, hydrology and green infrastructure would range from slight adverse to moderate beneficial in terms of significance of effect.
- In terms of visual amenity, the combination of the generally enclosed nature of the site and its medium sensitivity will ensure that there are relatively few adverse effects. There are currently only two locations where the likely visual impact could be assessed as more than slight adverse significance. These are adjacent or close to the site and can be adequately mitigated. Overall the effect on visual amenity is assessed as being slight adverse to neutral.

The landscape appraisal has therefore concluded that, proposals of the nature put forward would have the potential to cause some negative impacts on landscape and visual amenity but these would not be considered significant and in any event could be successfully mitigated through appropriate planting and landscape design. A full landscape and visual impact assessment would be submitted with the planning application to support this conclusion.

CLIMATE CONSIDERATIONS

With regards to climate change, a sustainability statement would be submitted with the planning application to highlight the suitability of the site and ensure the provision of appropriate mitigation on site. As a result it is not considered that development is likely to have significant effects over the lifetime of the development. Measures to reduce the impact of the proposals on climate change will be integrated into the proposals where possible, such as through the orientation of buildings and energy and water efficiency.

HUMAN HEALTH

Any associated risks to human health arising from the proposals would be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. As such it is not considered that the development is likely to have significant effects on human health.

CUMULATIVE EFFECTS

To ensure conformity with the Regulations, we have considered the potential for cumulative environmental impacts resulting from the development of the application site.

Planning Practice Guidance (PPG) advises that the local planning authorities should have regard to the possible cumulative effects arising from any existing or approved development. (Paragraph: 024, Reference ID: 4-024-20140306).

Neither the PPG nor the EIA regulations set out specific guidelines on what site should be considered as part of the cumulative effects assessment in terms of proximity between the site being screened and other existing or approved development.

A review of the Council's Policy Map indicates that there is a large strategic site allocation 'Land West of Horsham' to the north of the site (Core Strategy 2007 CP7). It is noted from the Council's most recent AMR (January 2019) that 1,330 out of 2,008 dwellings have been completed. We therefore consider that the majority of this allocation already forms part of the baseline. 678 dwellings are due to be completed up to 2027. Elements such as cumulative highway effects of the 678 dwellings yet to be completed, alongside the proposed retirement village, will be assessed as part of the Transport Assessment, which will be submitted alongside a future planning application. It is considered that there are no significant cumulative effects, when viewing the site alongside other approved developments.

SUMMARY

As the site lies in close proximity to other existing built development, the proposals will not have a significant urbanising effect. The proposed use has no effects associated with its construction or operation and, having considered the likely effects that could arise as a result of the development, we conclude that a significant effect on the environment is unlikely to arise.

Most effects of the proposed development will be of local significance only and can be addressed in supporting information to accompany a planning application. These effects are capable of being carefully considered as part of the normal planning application process. We therefore consider that, whilst the development is Schedule 2 development, it has been demonstrated that the proposed development will be unlikely to cause significant environmental effects, and in this case, EIA is not required.

CONCLUSIONS

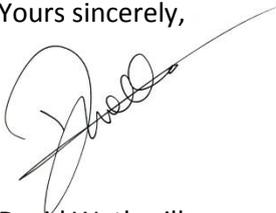
In light of the above, we conclude that the site is not located within an area of particular environmental sensitivity. Furthermore, the proposed works would not result in unusually complex or hazardous environmental effects. Having considered the likely effects as a result of the proposed development, we conclude that significant effects on the environment are unlikely to arise. The effects of the proposed development will be of local significance only and can be addressed in supporting information to accompany the planning application.

We should be grateful if the LPA would adopt a Screening Opinion on the basis of the above information. We should also be grateful if you would confirm that you have the authority to issue a Screening Opinion on behalf of the Authority and that they have 'sufficient expertise' as defined by Regulation 4(5). We look forward to receiving your opinion within the statutory period. In providing the decision, we would request that in accordance with Regulation 5(5) the Screening Opinion fulfils the following requirements:

- *“state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3.”*
- *“if it is determined that the proposed development is not EIA development, state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment.”*

Please do not hesitate to contact me should you have any queries regarding this correspondence or should further information be required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Wetherill', with a long, sweeping flourish extending upwards and to the right.

David Wetherill
Senior Planner

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