

Horsham District Council Screening Assessment

Applicant Reference: EIA/21/0006

Development Proposal: Erection of 235 dwellings (35% affordable) along with access, landscaping and Nature Reserve at Parsonage Farm Henfield BN5 9QR

EIA Regulations	
Is the proposed development listed in Schedule 1?	No
Is the proposed development listed in Schedule 2? (Note 'wide of scope, broad of purpose' legal judgement)	Yes – The proposal exceeds thresholds of Category 10(b) projects in Column 1 of Schedule 2 of the Regulations. The proposal includes: <input type="checkbox"/> More than 150 dwellings (235 proposed); <input type="checkbox"/> The overall area of development exceeds 5 hectares (total development area is 31.5Ha). This means the proposal could constitute Schedule 2 development subject to the selection criteria as identified in Schedule 3 of the Regulations.
Is the proposed development in a sensitive area as defined in Regulation 2? (SSSI, National Park, property on World Heritage List, Scheduled monuments, AONB, SPA or SAC)	No

Schedule 3 – 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
a) Size of development (e.g. site area, scale)	<p>The proposed development seeks 235 dwellings (including 35% affordable housing) on approx. 6.7 ha of land with an average density of 33 dwellings per hectare. The wider site comprises 31.5 ha and includes five fields located to the North of Henfield and west of London Road including three arable fields; two fields of semi improved pastoral grassland; and Parsonage Wood. Part of the site includes a horse grazed paddock. The proposed development would predominantly comprise 2 storey dwellings over 6 main parcels of land with the remaining land being used for formal and informal space.</p> <p>Primary access is to be provided from London Road (A281) with pedestrian, cycle and emergency access taken from the existing and retained parsonage farm access point off Hudson Way /Meadow Drive. Along with the creation of an east to west primary route through the proposed parcels of residential development, with Rights</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

	<p>of Ways across the site to be retained and enhanced providing accessibility to the Downs Link, proposed Nature Reserve and existing facilities within Henfield. Provision of formal and informal open spaces comprising play areas, picnic area and allotments.</p> <p>The site is an identified site within the made Henfield Parish Neighbourhood Plan.</p>	
<p>b) accumulation with other existing or approved development</p>	<p>The site is located close to developments constructed in 2014 and 2016, including Deer Park and Meadow Park). The cumulative impacts of the proposed development on this site should consider the effects of both construction and operational phases of the development which together may have a greater impact than those considered separately for each development. It is considered that with the implementation of standard best practice mitigation measures significant cumulative effects of potential related and combined impacts are considered to be unlikely during either the construction or operational phases of the development. Supporting evidence will need to be submitted with the development proposals and provide a thorough assessment of the likely impacts and mitigation measures that would be proposed to overcome any potential adverse or appreciable impacts on visual or private amenities.</p> <p>A Landscape and Visual Impact Assessment which considers cumulative impact must be with any forthcoming application.</p>	
<p>c) use of natural resources, in particular soil, water and biodiversity <i>(e.g. land, water, materials, energy – non-renewable or in short supply?)</i></p>	<p>The development will require the use of resources such as land, energy, materials for construction and operational phases of the proposals, along with road surfacing and hard and soft landscaping. The Council can require the applicant to include measures in the CEMP to minimise the consumption of natural resources. The dwellings would be constructed in accordance with standard techniques in line with most up to date Building Regulations.</p> <p>Horsham District is situated in an area of serious water stress, as identified by the Environment Agency Water Stressed Areas Classification.</p> <p>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 Sussex North Water Resource (Supply) Zone also covers Crawley Borough and parts of the</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application:</p> <p>CEMP</p>

Chichester and Arun Districts and the central area of the South Downs National Park.

This area is served by groundwater abstraction near Pulborough. This has the potential to impact upon the nearby Arun Valley, a Special Area Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The hydrology (water quantity and its movement) of the area is essential to maintaining the habitat upon which the designation features/species rely on.

This Authority has received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the above Arun Valley sites. It advises that development within this zone must not add to this impact.

The full interim advice from Natural England is that development proposals that would lead to a material increase in water demand will need to demonstrate 'water neutrality'. This means that there would be no increase in water consumption, demonstrated by a combination of water efficiency, water recycling and offsetting measures. This should be demonstrated in a water budget, showing the baseline and proposed water consumption and mitigation measures proposed. This must be submitted as part of the application.

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.

The applicants advise that during construction phase there would be some loss of natural resources including trees and other ecological habitats. Initial Biodiversity

	<p>metric calculations indicate a 10% net increase in biodiversity within development and an 80% net increase within Nature Reserve metric.</p> <p>The applicants have provided an ecological assessment of the site and surroundings by the Ecology Partnership (2020 and 2021) - Surveys and supporting information has been provided and will be considered as part of the application process.</p> <p>A Sustainability/ Energy Statement (Daedalus Environmental – July 2021 has been submitted and will be considered as part of the application. This sets out how the development will be in accordance with the energy hierarchy along with some limited information details of water limitation use. The level of resources used will depend on the energy and sustainable construction standards for the proposed use.</p> <p>Measures within a CEMP to minimise the consumption of natural resources are required as part of the application.</p>	
<p>d) the production of waste (demolition, construction, operation and decommissioning?)</p>	<p>In accordance with best practice measures, a CEMP will be prepared, which will include details of the types of waste stream that will likely be generated on-site during demolition and construction, along with the relevant recycling/ disposal route. Waste minimisation strategies incorporated in the design and the procurement strategy, and information on how waste will be managed during the construction works (e.g. the employment of the waste hierarchy strategy, to minimise the volume of waste produced and to divert waste from landfill as far as possible) will also be outlined within the CEMP. It is anticipated that waste during the operational stage of the Proposed Development will be managed by a registered waste contractor.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application:</p> <p>Site Waste Management Plan may be required</p>
<p>e) pollution and nuisances (e.g. potential for noise, dust, vibration, light, odours, production of substances / emissions which may damage</p>	<p>An application has been submitted with supporting information in regards to transport, ecology, drainage, air quality, contamination and energy and sustainability. These details will be assessed as part of the application process.</p>	<p>No significance and/or residual environmental impacts anticipated in EIA terms</p>

<p>environment -construction, operation and decommissioning)</p>	<p>During construction phase there is potential for some noise, dust and vibration from both the construction of residential development on the site as well as from traffic, any impact will be local to the site area and its immediately locality. The nearest noise receptors are identified as being residential dwellings within the surrounding area, and principally the adjacent properties. Impacts of noise could potentially be managed via imposition of appropriate conditions should it be considered necessary.</p> <p>Any impact during construction 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), to ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers.</p> <p>Any new residential development would lead to some level of road traffic generation and may need to be considered against criteria set out in the Institute of Environmental Management and Assessments' (IEMA) 'Guidelines for the Environmental Assessment of Road Traffic'.</p> <p>Construction works are likely to generate a higher number of HGV's accessing the site from the surrounding network of roads during the delivery and removal of import materials. Details of measures to deal with dust generated through construction should be managed in accordance with best practice measures and as required within a CEMP. A Transport Assessment and Travel Management Plan should address the effects of Highway networks and any requirements for mitigation. The effects on private and visual amenities within the locality are considered to be temporary and significant environmental effects are not considered to be likely.</p> <p>Appropriate measures, in accordance with all relevant legislation, should be used to prevent accidental spillages of contaminants during the construction and use of the highways improvements once completed.</p> <p>There would also be emissions resulting in air quality considerations that are associated with the operational phase of the proposed development. As the development is residential in nature, emissions would mainly be associated with the number of vehicles travelling to and from the site as a result of the future residents that will occupy the 235 dwellings on the site. The site is not located within an Air Quality Management Area.</p>	<p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application</p> <p>Noise Report Construction Management Plan Air and dust pollution Assessment Noise and Vibration Assessment Lighting Assessment and Strategy</p>
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<p>f) the risk of major accidents and/or disasters (including those caused by climate change)</p>	<p>It is not considered that the site is within an area where natural disasters are likely to occur including those arising from climate change. However, the proposed development which is within Flood Zone 1 (low risk area) would increase the level of impermeable areas on the site which without mitigation measures would result in an increase of surface water flooding. The scheme should adopt sustainable drainage techniques to mitigate against such concerns. A Drainage Strategy should be submitted with any future planning application.</p> <p>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. The proposed development should be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of and the site to major accidents / or disasters.</p> <p>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 are assessed by way of supporting material submitted with the</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application</p> <p>Environmental Assessments CEMP</p> <p>Risk</p>

	<p>planning application and conditions imposed in the event of planning being permitted. An Environmental Risk Assessment is required as part of any future application to be submitted. All such measures would form part of the CEMP. 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.</p>	
<p>g) The risks to human health (e.g. due to water contamination or air pollution)</p>	<p>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 machinery and dust causing activities are located as far away from sensitive receptors as possible.</p> <p>Southern Gas Network (SGN) records show an 18 " steel high pressure gas main crossing the centre of the site from east to west and a 24 " steel high pressure gas main crossing the north of the site. The proposed development should be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of and the site to major accidents / or disasters.</p> <p>The applicants have submitted a Transport Assessment (Welbeck strategic land II LLP July 2021) detailing Personal Injury Accident (PIA) data over the last five year period to identify any causations which might increase safety risks. Details to be considered as part of the current application.</p>	<p>No significant and/or residual environmental impacts anticipate drainage Strategy</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts. Arising from the development.</p> <p>Further details required with application</p> <p>CEMP</p>

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
<p>a) the existing land use</p>	<p>The site is identified as an allocated site within the countryside. Within the Henfield Neighbourhood Plan. The wider site comprises 31.5 ha and includes five fields located to the North of Henfield west of London Road including three arable fields; two fields of semi improved grassland; and Parsonage Wood. Part of the site includes a horse grazed paddock.</p>	<p>No significance and/or residual environmental impacts anticipated in EIA terms</p>

	<p>The site is located on the edge of an existing settlement, with existing houses along the boundary edge of Parsonage Farm. Views of the site from nearby public viewpoint are relevant and include those from foreground views from public footpaths along the southern boundary of the site; seasonal views from the Downs Link and from other publically assessable land from the north; Glimpsed views from footpath 2530, views being within the contact of the existing residential development or replacing existing views.</p>	<p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
<p>b) the relative abundance, quality and regenerative capacity of natural resources in the area (common land use? Quality of land / designations / protected species – would development lead to irreversible loss of key qualities or resources in the area?)</p>	<p>The nature of the development would have a long term impact as a result of the permanent and irreversible loss of land associated with the existing arable land. The site is however identified within the Henfield Neighbourhood Plan for residential development. A Preliminary Ecological Survey is necessary and should form part of the planning application considerations.</p>	<p>No significance and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
<p>c) the absorption capacity of the natural environment, paying particular attention to</p>		<p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
<p>i) wetlands (e.g. floodplains, impacts on drainage, aquifers)</p>	<p>The Site is not considered to be at risk of fluvial flooding, with the entirety of the site located within Flood Zone 1 (low risk). As detailed on the Defra MAGIC maps, the site is located above an unproductive aquifer, with no noted groundwater vulnerability</p> <p>Areas of the site are potentially vulnerable to surface water flooding. However, 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. 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.</p> <p>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.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>

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 Sussex North Water Resource (Supply) Zone also covers Crawley Borough and parts of the Chichester and Arun Districts and the central area of the South Downs National Park.

This area is served by groundwater abstraction near Pulborough. This has the potential to impact upon the nearby Arun Valley, a Special Area Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The site is within 7 km of the Arun Valley SAC / SPA/ Ramsar which exhibits inland water bodies (Standing water, running water) and bogs, marshes and water fringed vegetation, fens. The hydrology (water quantity and its movement) of the area is essential to maintaining the habitat upon which the designation features/species rely on.

The definition of water neutrality is that the use of water in the supply area before the development is the same or lower after the development is in place. Therefore, for every new development, water demand should first be minimised then any remaining water demand offset, so that the total water demand on the public water supply in a defined region is the same after development as it was before.

In the case of the Proposed Development, water efficiency calculations will be completed for the existing site to determine the water consumption per person per day and in total. Water efficiency calculations will then be completed for the proposed development to establish the baseline water consumption. The next step will be to introduce water reduction measures such as flow restrictors, dual flow WCs, waterless urinals, timers, smart metering, etc. and recalculate the predicted water usage. It is expected that these measures will reduce the predicted consumption below that of the existing site, however, should that not be the case then the next consideration will be the introduction of water re-use either through rainwater harvesting or grey water recycling. Again, the impact of these measures will be calculated either individually or combined as necessary to demonstrate that the revised achieved predicted water consumption is less than that of the existing site.

	<p>Natural England suggest a target of 85 litres per day per person to demonstrate neutrality this would be for residential accommodation. There is of course a third option to consider and that is water offsetting whereby the developer may fund retrofits of existing buildings to achieve a commensurate reduction in water consumption.</p> <p>Based on the measures set out above, significant effects are not considered likely for water neutrality as a result of the Proposed Development coming forward.</p> <p>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. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
ii) coastal zones (any potential for the scheme to impact on coastal areas e.g. runoff etc)	N/A	N/A
iii) mountain and forest areas (impacts on wooded areas, including any designated areas of ancient woodland / TPOs).	<p>An area of Ancient Woodland (parsonage Wood) is located to the north of the site and lies within the application site boundaries. There are no identified TPO trees within the site boundaries.</p> <p>A Tree Survey and Arboricultural Report (Aspect Arboriculture July 2021) have been submitted with the current planning application. In addition, the proposed development will include areas of new landscape planting, including native shrubs. A landscape and Visual Appraisal report (Scarp Landscape Architecture Environmental Planning – Aug 2021) has also been submitted can be submitted with the planning application. Details to be considered as part of the application process.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)	<p>The site falls within a Designated Protected Area as identified in the online DPA legislation reference maps – https://digitalservices.homesengland.org.uk/designated-protected-areas/</p> <p>The South Downs National Park is approximately 4.2km to the south east, and</p>	No significant and/or residual environmental impacts anticipated in EIA terms

	<p>3.3km to the south. The nearest statutory designated areas are Beeding Hill to Newtimber Hill SSSI approx. 5.7km to the south; Chanctonbury Hill SSSI approx. 7.5km to the south west; Parlam Park SSSI approx.13.7km to the west, and Pulborough Brooks SSSI approx.14.7km to the west, this area is also subject to European designation as part of the Arun Valley Special Area of Conservation (SAC) and Special Protection Area (SPA. The nearest part of the SSSI/SAC/ SPA is managed as a nature reserve, with management of water drainage to maintain water quality.</p>	<p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p> <p>Further information required with application:</p> <p>Lighting Assessment and Strategy Landscape and Visual Appraisal</p>
<p>v) areas classified or protected under Member States' legislation; areas designated by Member states pursuant to Directive 79/409/EEC (conservation of wild birds) and Directive 92/43/EEC (conservation of habitats and fauna) (In particular the Arun valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European protected species present that could be affected?)</p>	<p>The application site does not constitute a 'sensitive area' as defined by the EIA Regulations.</p> <p>The nearest statutory designated area of Pulborough Brooks SSSI, also subject to European designation as part of the Arun Valley Special Area of Conservation (SAC) and Special Protection Area (SPA) and is located approx..14.7km to the south.</p> <p>The site is partially located within an identified Bat Sustenance Zone (South and south east parts) designated for its populations of Pipistrelli; Plecotus; Barbastelle; and Eptesicus bat species. Key habitat features are advised to be retained within the site layout along with a sensitive lighting scheme. Details should be submitted as part of the planning application.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p> <p>Further information required with application terms</p> <p>Lighting Assessment and Strategy</p>
<p>vi) areas in which the environmental quality standards laid down in Community legislation have already been exceeded (any areas already subject to pollution or damage – include impact on any AQMAs).</p>	<p>There are no areas of the site where quality standards such as AQMA's have been exceeded.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p>
<p>vii) densely populated areas (size of population affected, changes to demography,</p>	<p>The proposal would generate employment within the construction industry and would boost the local economy. However the impact is unlikely to be</p>	<p>No significant and/or residual environmental</p>

lifestyles, employment etc)	significant.	impacts anticipated in EIA terms.
viii) landscapes of historical, cultural or archaeological significance	<p>The site is not designated as being of particular landscape importance in that it is not designated AONB or National Park. However the site is located close to the South Downs National Park, approximately 4.2km to the south east, and 3.3km to the south.</p> <p>Scheduled Ancient Monument Designation identifies the site at Parsonage Farm as a Historic Farmstead (MWS13264) and HWS1617 Large Farmstead (Historic Landscape Characterisation) as being medieval to modern.</p> <p>There are no identified listed buildings within the site, however, there are Grade II listed dwellings in the wider area including 'Little Betley' and 'Great Betley' at Stonepit Lane lies 382 and 687 metres respectively from the nearest part of the western boundaries of the site, and The Lodge at Chestham Park lies 367 metres from the nearest eastern part of the site boundary. The site is separated by field boundary hedges and trees and as such views are partly shielded notwithstanding this a Landscape and Visual Impact Assessments and a Zone of Theoretical Visibility Assessment (ZTV) is required as part of any future application to assess sensitive views from the South Downs National Park and any nearby PROW's.</p> <p>Visual impacts arising will require mitigation and measures should be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. Supporting details are required as part of the planning application.</p> <p>The SDNP will be consulted on the application submitted. Any visual impacts on the National Park and its setting should be considered as the site may be visible from PROW within the National Park and possible key landmarks. Any assessment of the visual impacts of the proposed development should provide a ZTV. It is advised that the applicant may find it helpful to reference the Viewshed Analysis evidence available on the SDNPA website. https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/evidence-and-supporting-documents/viewshed-analysis/</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms.</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further information required with application:</p> <p>Planting and Management Plan</p>

3. 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
<p>a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)</p>	<p>Residents adjacent to the site will be affected by the development during the construction phase. Adverse effects would be mostly temporary and minimised through the implementation of a CEMP.</p> <p>The Proposed Development is in a location and of a height that would not affect aviation – either during demolition, construction (e.g. cranes), or operation. The Proposed Development is expected to be a maximum of 2 and 2.5m height dwellings, similar to the existing buildings, and as such would not impact operations of any surrounding airports or aerodromes. Therefore, it is considered unlikely that the Proposed Development will result in any significant effects on aviation during construction or operation.</p> <p>The Arun Valley is located to the west of Henfield (in HDC but within the SDNP) is designated as being of international importance for nature conservation. (It is a Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site as well as the national designation as a Site of Special Scientific Interest (SSSI).</p> <p>The water supply for Horsham District, some of Chichester District and most of Crawley Borough (excluding Gatwick Airport) come from water abstraction at Hardham pumping station, located to the west of Henfield. The Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region.</p> <p>Natural England are concerned that development which takes place in advance of the emerging Local Plan will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that HDC should not issue any new planning decisions until Natural England have produced a mitigation strategy.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

	<p>that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
<p>b) the nature of the impact</p>	<p>The main impacts are on the landscape (given the rural nature of the site), ecology and biodiversity, and archaeology, as well as potential impacts from lighting, noise and traffic generation (construction and operational development) and possible impacts to heritage assets. In terms of visual amenity, there are currently locations where the likely visual impact can be assessed. Possible negative biodiversity impacts arising given the potential for bats given the site lies partly within an identified Bat Sustenance Zone. Some positive biodiversity impacts and landscape enhancements may arise as a result of the proposed development.</p> <p>The Proposed Development has the potential to impact on local air quality during both construction and operation. During construction this would be due to the potential impacts of dust soiling, road traffic emissions from construction traffic and once operational through road emissions and day to day operation of the Proposed Development.</p> <p>An air quality assessment should be submitted in support of the planning application, which will provide details of mitigation measures, if required. The development has the potential to lead to permanent impacts on landscape Significant character, landscape, water resources affecting the Arun Valley SAC, SPA and Ramsar sites, and visual amenity, both to the locality and its immediate and wider setting within the National Park landscape.</p> <p>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. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

	<p>indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
<p>c) the transfrontier nature of the impact (any international impacts?)</p>	<p>The water supply for Horsham District, some of Chichester District and most of Crawley Borough (excluding Gatwick Airport) come from water abstraction at Hardham pumping station, located to the west of Henfield. Natural England has advised that this matter should be resolved in partnership through Local Plans across the affected authorities, where policy and assessment can be agreed and secured to ensure water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy.</p> <p>The Natural England Position Statement advises it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site. The Arun Valley site is designated a SAC and RAMSAR site under European and International law.</p> <p>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. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p>
<p>d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)</p>	<p>Natural England are concerned that development which takes place in advance of the emerging Local Plan will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that HDC should not issue any new planning decisions until Natural England have produced a mitigation strategy.</p> <p>Significant environmental impacts anticipated In the case of the size and nature of the development proposal (the additional housing quantum and new allotments) will have an increase in water consumption, and so</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the</p>

	<p>require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality can be achieved by developers building significant water efficiency measures into new development and by providing offsetting measures to reduce water consumption from existing development, so the development becomes water neutral. The statement will need to calculate the water balance and we will be providing some further guidance on what should be included in a water neutrality statement. It is not just a case of providing water efficiencies measures onsite as this will not make the development water neutral</p> <p>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. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p> <p>The impact of the development arises from the potential for 235 new dwellings on the site would most likely be felt by the immediate neighbours, surrounding development and occupiers. However given the close proximity of the adjacent settlement and Built up Area Boundary, the effects of the potential development are likely to be experienced within this residential context and as such would not be considered unusual, subject to a thorough assessment of all relevant supporting information. It is considered that the scale and location of the development may result in landscape visual impact and impact on protected species within the surrounding habitats. Supporting information is required to ascertain the significance of this impact, however it is anticipated this could be managed through usual application process and the provision of appropriate mitigation and conditions. There is also likely to be some impact in terms of additional traffic generation. Further details regarding the anticipated traffic movements and numbers to and from the site each day / week will be considered as part of the application process in order to assess the impact of the proposed development.</p>	<p>development:</p> <p>Further information required with application:</p> <p>Planting and Management Plan</p>
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	<p>Impacts on landscape could be managed through the provision of appropriate mitigation.</p>	
<p>e) the probability of the impact (e.g. overall probability of impacts identified above)</p>	<p>Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact. This is required Significant environmental impacts anticipated by recent caselaw, Case C-323/17 People over wind and Sweetman. Ruling of CJEU (often referred to as sweetman II) and Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu Case C-293/17 (often referred to as the Dutch Nitrogen cases).</p> <p>Between them these cases require Plans and Projects affecting sites where an existing adverse effect is known (i.e. the site is failing its conservation objectives), to demonstrate certainty that they will not contribute further to the existing adverse effect or go through to the latter stages of the Regulations (no alternatives IROPI etc).</p> <p>The probability of impacts highlighted are considered to be permanent and long-lasting given the scale and nature of the development.</p> <p>The site is generally at low risk of flooding from all other sources. Some residual risk exists in the form of surface and groundwater flooding. However mitigation measures exist to manage this. This can 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.</p> <p>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. Mitigation measures at planning application stage can be used to appropriately manage impacts arising from the development (plus any cumulative impact that may arise).</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p> <p>Further information required with application:</p> <p>Water Neutrality Statement Planting and Management Plan Noise and vibration Assessment.</p>

	<p>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.</p> <p>Other impacts such as impacts on protected species or the level of traffic increase are less certain and some may be managed through appropriate controls exercised through the imposition of conditions as required.</p> <p>Some degree of landscape impacts are likely to arise from the proposed development however, such potential impacts and their probability would likely be mitigated through appropriate planning conditions and obligations.</p>	
<p>f) the duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)</p>	<p>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.</p> <p>This includes water usage impact on the Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Significant environmental impacts anticipated Zone. Developments within Sussex North must not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p> <p>Further information required with application:</p> <p>CEMP Noise and vibration Assessment</p>

<p>g) the accumulation of the impact with the impact of other existing and/or approved development</p>	<p>The construction phase would result in temporary construction impacts that could be managed through a CEMP. The operational development is unlikely to result in significant effects.</p> <p>This Authority has received a Position Statement from Natural England. The Natural England position is 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 must not add to this impact. Whilst individual site allocations may not result in likely significant effects in isolation, in combination with each other and other projects and plans that the grant of planning permission in this instance would set the precedent for, they have the potential to result in adverse effects in the integrity of the SAC/SPA/Ramsar sites.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p>
<p>h) the possibility of effectively reducing the impact</p>	<p>During the construction phase, adverse effects would be temporary and minimised through the implementation of a CEMP and best practice measures.</p> <p>Various assessments and statements will be submitted with the planning application to ensure the provision of appropriate controls and mitigation on site. Measures to reduce the impact of the proposals on climate change, visual and landscape impacts, and ecology should be integrated into the proposals where possible, such as through the orientation of the buildings and energy and water efficiency.</p> <p>An Appropriate Assessment screening maybe required on this proposal. A planning application will be supported by an Ecology Assessment and appropriate surveying.</p> <p>A Legal agreement and / or conditions can be entered into to ensure that the potential development is suitably controlled and any identified adverse impacts mitigated by appropriate conditions and legal agreements as considered necessary.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p> <p>Further information required with application:</p>

	<p>Developments within Sussex North must not add to the Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone impacts and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.</p> <p>Where an increase in water consumption is likely (including reserved matters), the Council will require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality can be achieved by developers building significant water efficiency measures into new development and by providing offsetting measures to reduce water consumption from existing development, so the development becomes water neutral. The statement will need to calculate the water balance and we will be providing some further guidance on what should be included in a water neutrality statement. It is not just a case of providing water efficiencies measures onsite as this will not make the development water neutral.</p> <p>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. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	<p>Construction Management Plan</p>
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Results of any relevant EU environmental assessment that is reasonably available	None applicable	
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Conclusion

EIA Required?	No
Statement of reasons	<p>The Proposed Development is not a Schedule 1 development, and it is not located in a sensitive area. Whilst the threshold for site area is exceeded in Schedule 2 of the EIA regs. (2017) the effects of development are considered not to be significant in combination with existing and approved development. There would be some impact on natural resources including biodiversity, and the production of waste and pollution during the construction phases however these are considered to not be significant in relation to the types and characteristics of the potential impact. There is likely to be some negative landscape and traffic impacts arising from the impact of the development on the countryside surrounding the development site arising from the introduction of new dwellings on this allocated site within the Henfield Neighbourhood Plan. 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 235 dwellings on this site, in combination with the surrounding cumulative development, is likely to result in an increase in vehicles and vehicle movements. 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. There may be some impact on other areas such as ecology, archaeology and heritage however these can be suitably mitigated and would not likely be significant, however further information is required in terms of these aspects to fully appreciate the impact of the proposed development but this is not considered to be significant enough to trigger an EIA. 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.</p>
Date	AW – 07/12/2021