

Horsham District Council Screening Assessment

HDC Reference EIA/19/0001

Applicant Reference: INSR3001

Development Proposal: 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.

EIA Regulations	
Is the proposed development listed in Schedule 1?	No
Is the proposed development listed in Schedule 2?	Yes. Exceeds threshold of Category 10(b) projects in Column 1 of Schedule 2 of the Regulations; the site area exceeds 5 hectares as per Category 10(b)iii. Note: The screening request and the subsequent opinion refers to the net developable (3.52 hectares), along with the site area 7.6 hectares. The net developable figure is calculated based upon illustrative material, which could be subject to change as the design progresses.
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)	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 (direct and indirect)
a) Size and design of development (e.g. site area, scale)	<p>The site consists primarily of an 'L' shape and covers an area of 7.6 hectares. The site consists of open farmland, currently used for horse paddocks. In the north east of the site lies the River Arun. The eastern extent of the site falls within Flood Zones 2 & 3. A Southern Water pumping station lies within the site and is to be retained. 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 has direct access onto the A264 linking to the A24 (onto Crawley, Worthing, and Brighton). The site abuts the Built-up Area boundary of Horsham. The development would include the construction of landscaping, drainage and associated works. The development would facilitate access to the A264. The development is similar in nature to surrounding residential housing estate land uses within the Built-up Area boundary.</p> <p>In terms of access arrangements, the primary vehicular access to the site will</p>	Not significant and/or residual environmental impacts anticipated

	<p>be derived from a new priority junction off the A264 Five Oaks Road, located to the north east of the existing junction with Lyons Road. A secondary emergency access into the site will be provided, utilising the existing Wellcross Farm Cottage access off the A264 Five Oaks Road.</p> <p>In terms of demolition, the demolition of 5 existing buildings totalling 233 sq m and site clearance to facilitate the development.</p> <p>In terms of timings, the build out of the proposed development from 0-5 years from receipt of all necessary consents, anticipated over 3 phases.</p> <p>In terms of maximum building heights, this will be circa 13m above ground floor finished floor level.</p> <p>In terms of flood risk, the developable site is outside of Flood Risk zones 2 and 3. Confirmation provided from the applicant dated 9th September 2019 that all of the proposed CCRC units will be within Flood Zone 1.</p>	
b) cumulation with other existing or approved development	<p>There is a large strategic site allocation 'Land West of Horsham' to the north of the site (Core Strategy 2007). It is noted from the Council's most recent AMR (Jan 2019) that 1,330 out of 2,008 dwellings have been completed. 678 dwellings are due to be completed up to 2027. The majority of this application already forms part of the baseline. 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. This consented scheme has its own required mitigation measures to address any adverse effects.</p>	
c) the use of natural resources, in particular soil, water and biodiversity (e.g. land, water, materials, energy – non renewable or in short supply?)	<p>The construction of the development will use resources in terms of land, water and energy as would be expected for a residential development. The 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.</p>	Not significant and/or residual environmental impacts anticipated
d) the production of waste (demolition, construction, operation and decommissioning?)	<p>Construction waste would be reused and recycled where possible. Significant quantities of construction waste are not anticipated as a result of the development. Waste would be disposed of in line with HDC requirements and managed in accordance with all applicable legislation and in line with best practice.</p>	Not 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 t)	<p>During the construction phase there is 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</p>	Not significant and/or residual environmental impacts anticipated

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. Similarly, the air quality effects of road traffic by the proposed development, due to the land use masterplanning, are considered to be not significant for human health receptors. 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, will 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 land uses proposed are not highly contaminative.

The majority of the site is located in Flood Zone 1; low probability of river flooding. Areas at the north and east of the site where the River Arun crosses beneath the A264 and course of which then flows south are located in Flood Zone 3; high probability of river flooding. The effects in relation to surface water and hydrology will be assessed in full in supporting material submitted with the planning application. With the proposed remediation design and implementation of the mitigation measures outlined below, the resultant effects are unlikely not be significant. The scheme avoids any development in the flood plain. In addition, surface water run-off and foul water drainage will be managed on-site during the construction and operational phases.

The developable site is outside of Flood Risk zones 2 and 3. As part of a separate pre-application enquiry an indicative site layout was provided which demonstrated the quantum of development proposed can be accommodated outside of Flood Risk Zones 2 and 3

During construction any potential effects to existing properties would be mitigated by measures set out within a CEMP. These would include avoiding

	works in the floodplain wherever possible, and safe storage of plant or contaminants. Sustainable drainage would be considered, and appropriate drainage design would be included within the planning application documents including a Surface Water Drainage Strategy, Foul Drainage Scheme and Flood Risk Assessment (FRA).	
f) the risk of major accidents and/or disasters including those caused by climate change, in accordance with scientific knowledge	<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. 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.</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 were assessed by way of supporting material submitted with the planning application and conditions imposed in the event of planning being permitted.</p>	Not significant and/or residual environmental impacts anticipated
g) The risks to human health (eg due to water contamination or air pollution)	<p>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>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 will 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. Similarly, the air quality effects of road traffic by the proposed development, due to the land use masterplanning, are considered to be not significant for human health receptors. The land uses proposed are not highly contaminative and it is not expected that there is a high risk.</p>	Not significant and/or residual environmental impacts anticipated

2. Location of Development: the environmental	Description (include permanent / temporary impacts, positive and / or	Significance
--	--	---------------------

sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular to	negative impacts / likelihood of impact as applicable)	
<p>a) the existing and approved land use</p> <p>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 – would development lead to irreversible loss of key qualities or resources in the area?)</p> <p>c) the absorption capacity of the natural environment, paying particular attention to</p>	<p>The site consists of an L-shaped parcel of open farmland, currently used for horse paddocks. The site covers an area of 7.6 hectares. The development would include the construction of access, landscaping, drainage and associated works, and would change the land use from agriculture. Residential properties are present in the vicinity of the site. 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.</p> <p>The effects of the proposed development are considered to be of local importance and there are a number of proposals to compensate for the loss of trees due to the proposed development such as new planting and wildlife habitats and enhancements.</p> <p>Construction traffic, noise and dust effects from the development would also be likely but through the implementation of mitigation measures included within the CEMP, these are not expected to be significant.</p> <p>The development will result in the loss of primarily Agricultural Land, which is moderate to poor quality. There will be re-use of much of the surplus soil on-site.</p> <p>No additional land or important, high quality or scarce resources will be affected. Wealden Brick Clay is a mineral in abundance in the locality.</p>	<p>Not significant and/or residual environmental impacts anticipated</p>
<p>i) wetlands, riparian areas, river mouths (e.g. floodplains, impacts on drainage, aquifers)</p>	<p>In the north east of the site is the River Arun and its floodplain. A significant area of wetland including ponds will also be created enhancing the existing ecology on-site. The developable site is outside of Flood Risk zones 2 and 3. Confirmation provided from the applicant dated 9th September 2019 that all of the proposed CCRC units will be within Flood Zone 1. The site is not located within or close to a groundwater SPZ.</p>	<p>Not significant and/or residual environmental impacts anticipated and mitigated</p>
<p>ii) coastal zones and marine environments (any potential for the scheme to impact on coastal areas e.g. runoff etc)</p>	<p>N/A</p>	<p>N/A</p>
<p>iii) mountain and forest areas (impacts on wooded areas, including any designated areas of ancient</p>	<p>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</p>	<p>Not significant and/or residual environmental</p>

woodland / TPOs).	removed	impacts anticipated
iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)	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 1.3km to the north west of the site. Other statutorily designated sites include the Warnham Local Nature Reserve (approximately 3 km to the north east of the site) and Warnham SSSI (approximately 5.4 km to the north east of the site).	Not significant and/or residual environmental impacts anticipated
v) European sites and other areas classified or protected under national legislation (this therefore includes areas designated pursuant to Directive 79/409/EEC (conservation of wild birds) and Directive 92/43/EEC (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 could be affected?)	<p>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 15 km zone of influence, to the south east of the SAC and SPA.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Not significant and/or residual environmental impacts anticipated

	An Ecological Mitigation Management Plan will be prepared and submitted in support of the planning application and will include retention of vegetation where possible, best practice construction measures, habitat creation and management measures to maintain and increase the biodiversity value of the site. An Arboricultural Survey, Impact Assessment and Method Statement will be undertaken and submitted with the planning application.	
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 there 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. An Air Quality assessment will be submitted with the application to identify any significant residual adverse environmental 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.	Not significant and/or residual environmental impacts anticipated
vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment etc)	Currently, the closest built-up areas to the site are Broadbridge Heath and Horsham. Both populations will be affected. Noise and lighting from the development is likely to arise from plant during the construction phase. However, this would be managed in accordance with the CEMP. The development is aimed at post-retirement age residents, so there may be impact upon health and support services although the retirement village concept is presented as 'self-sufficient' in terms of service and lifestyle provision, including health care and support services.	Not significant and/or residual environmental impacts anticipated
viii) landscapes of historical, cultural or archaeological significance	The site is not within an AONB or National Park. The site is not in a Conservation Area. There are no Scheduled Monuments within the site or in the immediate vicinity of the site. There are no statutory designated heritage assets within or adjacent to the site. The nearest listed building is Lyons Farm House, a Grade II Listed Building approximately 150 metres away from the site.	Not 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 confined to the site and the land immediately adjacent. Residents adjacent to the site will be affected by the development during the construction phase. Adverse effects would be temporary and minimised through the implementation of a CEMP. It is not considered that people would be significantly affected by the development once operational.	Moderate significance and/or residual environmental impacts anticipated

<p>b) the nature of the impact</p>	<p>The development has the potential to lead to impacts on landscape character, landscape resources and visual amenity. A preliminary landscape appraisal has been carried out. In terms of landscape character, overall the proposals will bring about a minor loss of 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.</p> <p>In terms of visual amenity, the combination of the generally enclosed nature of the site and its medium sensitivity will ensure that there are potentially adverse effects. There are currently locations where the likely visual impact could be assessed.</p> <p>There would be an increase in HGV construction traffic movements; increase in noise, particularly during site construction; operational traffic movements would not increase due to the development for the principal access works.</p>	<p>Moderate significance and/or residual environmental impacts anticipated</p>
<p>c) the transboundary nature of the impact (any international impacts?)</p>	<p>None</p>	<p>Not significant</p>
<p>d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)</p>	<p>There would be no large change in environmental conditions, and the effect would not be unusual for the area or particular complex. 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 transport choice. As the development is built out, car usage is expected to reduce as residents get older or require more substantial care.</p> <p>Many future residents of the development may already live locally, choosing to retire to a community in their area. They would therefore be active on the highway network in any event.</p> <p>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.</p> <p>The applicant proposes to operate a community bus or taxi service using electric vehicles. This will ensure that many vehicle movements are "shared".</p>	

	<p>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.</p> <p>An Ecological Mitigation Management Plan will be prepared and submitted in support of the planning application.</p> <p>The application boundary includes areas within Flood Zones 1, 2 & 3 (Low, Medium and High Probability of fluvial flooding).</p> <p>The developable site is outside of Flood Risk zones 2 and 3. The developable site is outside of Flood Risk zones 2 and 3. Confirmation provided from the applicant dated 9th September 2019 that all of the proposed CCRC units will be within Flood Zone 1.</p>	
<p>e) the probability of the impact (e.g. overall probability of impacts identified above)</p>	<p>The effects of the development can be clearly established and the probability of any effects determined with reasonable confidence. 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 events.</p> <p>The developable site is outside of Flood Risk zones 2 and 3. The developable site is outside of Flood Risk zones 2 and 3. Confirmation provided from the applicant dated 9th September 2019 that all of the proposed CCRC units will be within Flood Zone 1.</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.</p> <p>The developable site is outside of Flood Risk zones 2 and 3. As part of a separate pre-application enquiry an indicative site layout was provided which demonstrated the quantum of development proposed can be accommodated outside of Flood Risk Zones 2 and 3</p> <p>An existing drainage regime of natural infiltration and runoff exists with surface water run off directed towards the River Arun at the east boundary. A connection to this location would be maintained post development with attenuation provided in order to mimic the existing situation with the potential</p>	<p>Moderate significance and/or residual environmental impacts anticipated</p>

	<p>for a modern beneficial impact on more extreme storms.</p> <p>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.</p> <p>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.</p>	
f) the expected onset, duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)	<p>Construction effects would be short term in duration and the operational effects would be long term. Development will commence following the discharge of pre-commencement conditions attached to the planning permission. Operational effects would be permanent. Construction effects would be temporary. Construction – intermittent and Frequent and reversible. Operation – continuous and irreversible.</p>	No significance and/or residual environmental impacts anticipated
g) the cumulation of the impact with the impact of other existing and/or approved development	<p>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. This consented scheme has its own required mitigation measures to address any adverse effects.</p>	No significance and/or residual environmental impacts anticipated
h) the possibility of effectively reducing the impact	<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 studies and statements will be submitted with the planning application to ensure the provision of appropriate mitigation on site. 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 the buildings and energy and water efficiency.</p> <p>Legal agreement and conditions would be imposed to secure the provision of this appropriate mitigation.</p>	No significance and/or residual environmental impacts anticipated
Results of any relevant EU environmental assessment that is reasonably available	None applicable	

Conclusion

EIA Required?	No
Statement of reasons	<p>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. 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.</p> <p>During construction, the potential increases in traffic, emissions and noise will be temporary, commensurate with a typical construction site. Construction phase effects would be mitigated through the implementation of standard mitigation measures through a CEMP and best practice.</p> <p>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	Matthew Porter 18-09-2019