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The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

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Dear Ms Moseley

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED):

REQUEST FOR AN EIA SCREENING OPINION

Savills (UK) Limited, on behalf of Willmott Dixon (in partnership with West Sussex County Council (WSCC)), intend to submit a planning application at land east of the A24, West Horsham (the Site) for the erection of a fire station, training facilities, training yard, access road and associated parking and landscaping.

In advance of the planning application submission, we formally request the Planning Authority's Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environment Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations).

In accordance with Regulation 6(2) please find enclosed:

- A description of the development, including the physical characteristics and location of the development
- A description of the aspects of the environment likely to be significantly affected by the development
- Where information is available, a description of any likely significant effects of the proposed development on the environment
- A plan sufficient to identify the land (see Figure 1)

Description of the Site and Proposed Development

The Site

The Site is located on the western outskirts of Horsham, within Horsham District, near to the village of Broadbridge Heath to the west and Southwater to the south of the Site (central grid reference TQ152302). To the east of the Site is Highwood Mill extra-care facility, the A24 dual carriageway forms the western boundary, alongside which there is a steep embankment with mixed native tree planting. To the south is an area of mixed tree planting around a balancing pond and a BMX track. South of the BMX track is the River Arun.

The surrounding landscape includes open fields and patches of woodland connecting to the Site to the south-east and similar habitat to the west of the A24. Recent developments in the vicinity include the A24 new junction and housing development to the north, east and south of the Site (application reference DC/09/2128). Outline application DC/09/2128 was approved in August 2010 for up to 1,044 residential dwellings and included the provision of a fire station on the Site. However, it is no longer possible to submit reserved matters for the fire station due to the time restrictions attached to the outline consent. Therefore, a new planning application is being prepared.

The Site is approximately 1.7ha and largely comprises of semi-improved grassland with small pockets of woodland and ponds in the south-east. As the northern portion of the Site was used as a depot for the construction of the new A24 junction, the Site was largely cleared and then reseeded in 2015. The grassland habitat has been re-established on the Site.

The Site slopes down from west to east by about 2.5m. The south-eastern boundary, on the sloping part of the Site, contains a number of mature trees. As noted above, the land surrounding the site east of the A24 is predominately in residential use, with some phases still under construction.

With reference to the Environment Agency Flood Map for Planning, the Site is situated in Flood Zone 1. The nearest main river to the Site is the River Arun, located circa 100m to the south of the Site. Boldings Brook is located approximately 140m to the east. Currently, overland surface water runoff from the Site flows towards the nearby watercourses.

The Site is therefore considered to be of low sensitivity with regard to flood risk and drainage. However, as the Site is area greater than 1.0 ha, the planning application will be supported by a Flood Risk Assessment, in accordance with the National Planning Policy Framework (NPPF).

The Site does not contain any ecological statutory designations. Areas of ancient woodland, including High Wood Site of Nature Conservation Importance (SNCI) and Sparrow Copse SNCI are located within 500m of the Site. Designated sites in the wider area include Slinfold Stream and Quarry Site of Special Scientific Interest (SSSI), located approximately 2.8km west of the Site, St Leonards Park Ponds SSSI, which lies approximately 5km to the east of the Site, and Arun Special Protection Area (SPA), which lies approximately 15km to the south-west of the Site.

The Site is not in a Conservation Area, nor located near any sites of special architectural or heritage importance.

The most notable and nearest listed buildings are (in order of distance):

- Barn and Large Granary at Broadbridge Farm (Grade II Listed) 1391328 & 1392899 – 650m west of the Site
- Parthings Farmhouse (Grade II Listed) 1027029 – 700m south of the Site

Proposed Development

Whilst the nature and scale of the proposed development has been established, the final design has not yet been fixed and is subject to ongoing consultation and iterations.

Therefore, this Screening Request has been based upon the maximum parameters considered and the initial masterplan proposals (See Figure 2 – Site Plan enclosed) alongside a conservative assumption regarding the extent of the built development.

The proposed development will comprise the following:

- A three-storey fire station with appliance bays, offices, canteen, training facilities and dormitories
- A six-storey live fire training building
- A four-storey training tower
- A single storey breathing apparatus building
- Training vehicle storage
- Hardstanding around the buildings for access, parking and training requirements
- An underground water tank (approximately 43sqm in size) for the required sprinkler system
- New primary access point to the north of the Site
- New access point for emergency exit only along the A24 southbound on-slip on the eastern boundary#

- A vehicle fuelling tank

Vehicular access will be via the existing access from the north off the access road known as 'The Boulevard', which serves Highwood Mill, the existing residential care home. The access road links to the A264 interchange and the A24 (northbound and southbound). The proposed development includes the extension of the existing access road past the Highwood Mill, where a new single carriageway 6.5m wide road with a 2m wide footway will form part of the new access road to the Site.

The new access road will provide vehicular, pedestrian and cycle access to the proposed development.

A new access point for emergency exit only and specialised ladder fire engine is to be provided along the A24 southbound on-slip before the merge nosing area with the mainline. The direct access will be limited to fire service vehicles only and adequate signage and road markings will be provided as necessary on the public highway, as well as the necessary safety features (fences and safety barriers) as applicable.

EIA Screening Process

In advance of final designs, the precise quantum of development is not known. However, for the purposes of EIA it is suggested that a conservative approach is taken and it is assumed that the proposals will comprise greater than 1ha of non-dwellinghouse development when including associated yard and ancillary areas. Although, based on current designs, the proposed built form comprises circa 3,000sqm of floorspace.

Development that falls within Schedule 1 of the EIA Regulations always requires EIA and is referred to as 'Schedule 1 development'. Development listed in Schedule 2 that is located in a 'sensitive area' (as set out in Regulation 2(1)), or exceeds one of the relevant criteria or thresholds given in Schedule 2, is referred to as 'Schedule 2 development'. Not all 'Schedule 2 development' will require an EIA, only the developments likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as 'EIA development'.

As set out in the below table, the proposed scheme is not Schedule 1 development, but falls within the description in Schedule 2 Part 10(b) 'Urban Development Projects'. The proposed development (as described above) is not located within a sensitive area but would exceed a relevant threshold in Schedule 2 of 1ha of non-dwellinghouse development, and therefore comprises Schedule 2 development. As such, the proposed development would constitute EIA development if it is likely to result in significant environmental effects. The proposed development does not exceed the other thresholds set out in Schedule 2 Part 10 (b), which is 150 dwellings or more (not relevant) and a minimum site area of 5ha.

It is considered that the proposed development is not likely to result in significant environmental effects. Therefore, it would not constitute EIA development. In addition to the evidence and information presented below, the Planning Practice Guidance (PPG) provides indicative thresholds to assist in the determination of whether a project is likely to have significant environmental effects. For developments such as this, the PPG defines developments that would have significant urbanising effects in a previously non-urbanised area or provide a total of more than 10,000sqm of new commercial floor space as suitable thresholds. The latter threshold is substantially above the level of development proposed (the combined floor space¹ of the proposed development is currently circa 3,000sqm in current designs) and the Site is adjacent to existing urban development.

This is also in line with relevant EIA guidance provided in the PPG which states that "*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*" (Paragraph: 018 Reference ID: 4-018-20170728). The indicative threshold and criteria further states that Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use.

¹ 'Floor space' is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 as 'total floor space in a building or buildings'

Application Thresholds		
i.	Does the Proposed Development fall within Schedule 1 (Y/N)?	No
ii.	If yes, what is the applicable description?	N/A
If yes, the proposed development automatically requires EIA		
iii.	Does the proposed development fall within Schedule 2 (Y/N)?	Yes
iv.	If yes, what is the applicable description?	10(b) Urban Development Project
v.	Is any part of the proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi.	What is the applicable threshold/criteria in Schedule 2?	The development includes more than 150 dwellings or 1ha of non-dwellinghouse development or the overall area of the development exceeds 5ha.
vii.	Does the proposed development meet/exceed the applicable threshold (Y/N)?	Yes, as the Proposed Development could comprise more than 1ha of non-dwellinghouse development. However, based on current designs, the combined floor space of the Proposed Development will be no greater than 3,000sqm
If yes to (iii) and then (v) or (vii) the proposed development will require EIA if it is likely to have significant effects on the environment.		

Possible effects on the environment

The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations:

1. Characteristics of development (a) – (g) (of the Regulations)
2. Location of development (a) – (c) (of the Regulations)
3. Characteristics of the potential impact (a) – (h) (of the Regulations)

Features of the proposed development and any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment have been identified as per the PPG guidance at Paragraph 023 Reference ID: 4-023-20170728.

The applicant has a good understanding of the possible environmental effects of the proposed development having had significant experience in delivering projects of similar scale and nature within the South East. The design of the Site and buildings will reflect this experience and, as such, environmental mitigation is inherent in the proposals. **In the absence of inherent and additional mitigation** and in advance of any judgments of the significance of individual effects, the **possible** environmental effects of the proposals are as follows:

Possible effects on the environment

- Air quality – from emissions and dust generated during the demolition and construction phases and emissions resulting from the occupancy of the Site, including vehicular emissions.
- Noise and vibration – from construction operations and from the occupation of the Site.
- Landscape and visual effects – on the visual amenity of receptors in short, medium and long distance views of the scheme from the road network, public open space, public rights of way and residential properties; effects on the landscape character of the Site and its context and on landscape features within and adjacent to the Site.
- Hydrology, ground conditions and flood risk – the risk of contamination from the construction phase and from the operation of the scheme. The risk of flooding caused by the development and the management of flood risk both within the Site and beyond its boundaries.
- Social and environmental effects – including the creation of new employment through the construction and operational phases.
- Transport – the introduction of additional traffic on the local road network as a result of the construction and operational phases.
- Biodiversity and ecology – the effects on existing biodiversity and ecology from the construction and operation of the proposed development.
- Cultural heritage – the effects of the proposals on the setting of nearby heritage assets and non-designated heritage assets.
- Risks to human health – the risk of accidents or disasters resulting from the construction and operational phases of the proposed development.

1. Characteristics of development	
a) The size and design of the whole development	<p>The proposed development is for the erection of a fire station, training facilities, a new access and parking located on 1.7 hectares of land. The principal fire station block within the Site will be three storeys. The live fire training centre will be up to six storeys and the smoke training tower proposed will be four six storeys.</p> <p>Although the Site is currently undeveloped, the proposed new buildings are compatible with surrounding land uses, given the location of the residential development to the north, east and south of the Site (application reference DC/09/2138).</p> <p>The scale and uses of the development is considered to be appropriate for the location, reducing the likelihood of significant effects arising as a result. The final design of the development will respond to the sensitivities of the surrounding area and constraints of the Site.</p>
b) The cumulation with other existing development and/or approved development	<p>In respect of potential cumulative effects with other development, PPG advises that <i>“each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development.”</i> (ID 4-024-201740728).</p> <p>Consideration has been given as to whether there is potential for likely significant effects to occur through the combination of the proposed development with other existing or approved developments. Several committed and proposed schemes have been identified and considered in the context of this proposal and likelihood significant cumulative effects. These include:</p> <ul style="list-style-type: none"> • Land east of A24, Worthing Road, Horsham (DC/17/0164) – 208 dwellings (0.1km south); and • Land north of Old Guildford Road, Broadbridge Heath (DC/13/2408) – 165 dwellings (1.0km north) <p>The potential for significant cumulative effects caused by the combination of a number of impacts on a particular receptor (taking into consideration impacts at both the construction and operational phases) which, acting together, may cause a greater significant impact collectively than individually, has also been considered. Based upon the considerations presented within this table, and with the implementation of standard best practice mitigation measures, significant cumulative effects related to the overall combined impacts are considered to be unlikely during either the construction or occupation phases of the proposed development.</p>
c) The use of natural resources, in particular land, soil, water and biodiversity	<p>Development of the Site would require the use of a range of common natural and man-made construction materials and resources to complete the build and fit-out of the scheme. Given the scale of the proposed development, this is not likely to result in a significant impact associated with the use of natural resources.</p> <p>Water</p> <p>During the construction phase, some activities involve the consumption of water including some common mitigation measures used to control potential construction impacts, such as the dampening down of dust. During the operational phase, water will be consumed by the occupants. However, taking into account the scale and nature of the proposed development, significant effects related to water consumption are considered unlikely to arise.</p>

Biodiversity

The Site is largely cleared with a group of existing mature trees at the south-eastern and eastern boundaries of the Site. Therefore, the key ecological habitats within the Site are associated with the mature trees.

An Extended Phase 1 Habitat Survey was undertaken in 2018 and identified the following:

Bats – Some of the mature oaks within the woodland and the pill box adjacent to the Site were considered to have potential to support roosting bats. Within the woodland there are a number of bat boxes that have been installed on trees. These are likely to have been ecological mitigation or enhancement for the nearby developments.

Great Crested Newt (GCN) – GCN have been recorded locally and ponds are present on site and within 500m of the Site. A GCN survey report, prepared in July 2019, identified that populations of GCN were identified within two ponds – a low population for a pond within the Site and a low population for a pond located 50m of the Site.

Reptiles – Suitable habits for reptiles were identified within the Site boundary. Additional reptile surveys were conducted in September and October 2018. The surveys identified a low population of common lizards towards of southern end of the Site, as well as a grass snake and slow worm.

The reptiles found on the Site are proposed to be translocated to the balancing pond located south of the Site. A European Protected Species Mitigation (EPSM) licence will be sought from Natural England at the appropriate stage to translocate the GCN terrestrial habitat from the Site. A GCN Mitigation Strategy is currently being prepared and will be submitted as part of the planning application.

During the construction stage, without mitigation, there is potential for adverse impacts on the trees at and adjacent to the Site, which are considered to be the habitats with the highest level of ecological importance. However, the utilisation of appropriate protective barriers during the construction phase will prevent impacts on these features. Lighting near the woodland area to the south-east will be avoided or kept to the minimum necessary to avoid indirect disturbance of commuting bats in these areas.

Once completed, the proposed development will result in the permanent change in use of the Site, however the key features on/adjacent Site are to be retained, protected and enhanced. It is therefore considered that, overall, the proposal is unlikely to result in a significant effect on ecology and nature conservation, and provides opportunity to enhance landscape features on the Site which will help promote biodiversity. Through the introduction of additional trees on the Site, it is considered, once operational, the Site will provide increased opportunities for wildlife.

	<p>Soil The Site is not designated as best and most versatile agricultural land and is not currently in agricultural use. As such, the proposed development will not have a significant effect related to soils or the availability of agricultural land.</p> <p>There are no mineral constraints associated with the Site. The Site is not located within a minerals safeguarding area.</p> <p>Conclusion Overall, given the scale and nature of the proposed development, it is not considered that it will result in any significant environmental effects related to the use of natural resources, as no unusual or excessive use would occur on any resources that are considered to be in short supply.</p>
<p>d) The production of waste</p>	<p>The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur during either the construction or occupation phases. During the construction phase, best practice construction methods will be adopted, controlled via a Construction Environmental Management Plan (CEMP), to ensure that construction waste is appropriately managed, including onsite refuse and recycling wherever practicable. It is anticipated that the implementation of the CEMP will be a condition on any planning permission granted and it will be regularly monitored.</p> <p>Once operational, the proposed development will generate commercial waste. However, alongside appropriate storage, this waste will be collected and managed in accordance with all relevant legislation and guidance. Following collection, the waste would be suitably disposed of or recycled by, or on behalf of the waste disposal authority. The proposed development would generate predominantly commercial waste, for which the method of treatment is commonplace and which would not necessitate an EIA to evaluate its impact. As such, significant effects associated with waste generation are considered to be unlikely.</p>
<p>e) Pollution and nuisances</p>	<p>As described within this section, it is considered that the proposed development would not generate any significant level of environmental pollution or nuisance warranting the need for EIA. Nevertheless, the application will be supported by a full assessment of the proposals.</p> <p>Traffic During the construction phase, a higher number of HGV's will be required to access the Site and use the surrounding road network to remove and import materials. Vehicle movements can be controlled through a routing agreement with restrictions imposed over timings, as appropriate. A temporary impact could arise on local traffic which could affect people who live and work in the area. However, given the temporary nature of these impacts, the location of the development around well-established road and travel infrastructure, and through the implementation of standard controls methods, significant environmental effects are not considered likely.</p> <p>The level of traffic expected to be generated, coupled with the location of the Site in close proximity to the Strategic</p>

Road Network, particularly given that emergency vehicles from the proposed fire station will join directly onto the A24, means that significant effects related to traffic are not considered likely to result.

Noise

Noise and vibration associated with the construction phase of the development has the potential to impact upon receptors in close proximity to the Site. However, these noise effects will be temporary in nature and will be limited to day time hours secured through a CEMP, controlled by a planning condition. The Considerate Constructors Scheme (CCS) or equivalent will be implemented at the scheme.

Although the construction works will be carried out during the day time, some equipment, such as power generation plant for security or lighting, may be required to run at night. Such power generation plant typically operates using a diesel generator, which has the potential to cause disturbance at nearby residences. Old or ill-maintained equipment is likely to generate higher noise levels. However 'silenced' plant is available, which would reduce these noise impacts. It is therefore considered that construction impacts can be appropriately mitigated, through the use of noise dampening or silencing equipment, to ensure no significant environmental effects occur. During construction, noise and vibration levels will be kept within acceptable limits, although these will be in excess of the existing baseline. Measures will be detailed in a CEMP which will incorporate best practice measures, and will be agreed with the Local Planning Authority.

During the operational phase, background noise levels within the vicinity of the Site would not significantly change. The greatest sources of noise will be from vehicle use associated with the surrounding roads and noise from appliances entering and leaving the proposed station,, the on-site compressor used for breathing apparatus, and training activities in the yard on site, however the latter noise impacts are for a limited duration. The breathing apparatus building will be treated acoustically to ensure there are no adverse effects related to noise on nearby sensitive receptors.

For the majority of the time there is little sound associated with the operation of the fire station. Typically, the proposed development would generate new trips, which would create increased road traffic on access roads. Whilst unlikely to result in a significant adverse impact, the noise impacts from the proposed development would require assessment.

Air Quality

An Air Quality Assessment will accompany the planning application. The construction works associated with the proposed development have the potential to impact on local air quality conditions through:

- Dust emissions generated by demolition, excavation, construction and earthwork activities
- Emissions of exhaust pollutants, especially NO₂, PM₁₀ and PM_{2.5} from construction traffic on the local road network
- Emissions of NO₂, PM₁₀ and PM_{2.5} from non-road mobile machinery (NRMM) operating within the Site have the potential to adversely impact local air quality at sensitive receptors in close proximity to the works

	<p>While there is likely to be some dust creation during construction, this would be controlled by appropriate planning conditions. Through the adoption of standard best practice measures the likely residual impact of the proposed development are not considered to be significant in accordance with the IAQM guidance. Mitigation measures such as implementing a dust management plan, ensuring screens are placed around dust producing activities and using dampening techniques would further reduce the potential dust impacts. Air quality impacts from construction vehicle emissions can be reduced through best practice construction techniques, such as ensuring that vehicles are not left idling. The above can be implemented and managed through the production of a CEMP, secured through a suitably worded planning condition.</p> <p>During operation, the air quality impacts will be limited to pollution associated with any increase in traffic movements as a result of the proposed development and emission of heat haze from the proposed smoke training tower during training exercises (short-term, temporary impacts). Given the nature of the proposed development, significant effects are not considered likely to result.</p> <p>Ground conditions</p> <p>Four trial pits and a window sample were undertaken in the area of the Site as part of the adjacent housing development. The report provided by Geo-Environmental, dated 20 July 2010, records a thin layer of topsoil over Weald Clay, described as a stiff to very stiff friable silty clay down to 2 to 2.5m with mudstone or siltstone of the Weald Clay formation below.</p> <p>From the historic maps, it would appear that the Site has remained as undeveloped farmland and there is no evidence of clay pits or other extractions.</p> <p>The Weal Clay can have high concentrations of sulphates, which could affect concrete in the ground, however only low concentrations were found in previous surveys.</p> <p>The Environmental Agency ground water vulnerability map shows the solid geology at the Site to be classified as non-aquifer with no vulnerability. The likelihood of contamination is very low.</p>
<p>f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific</p>	<p>The site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the proposed development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the Site is extremely low. The proposed development will 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>knowledge</p>	<p>It is considered that whilst there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely. Workers involved in the construction of the proposed development would be exposed to the normal risks associated with construction. The risk of accidents and harm to human health and the environment is considered to be insignificant given the nature of the proposed development.</p> <p>Flood Risk</p> <p>The proposed development will increase the impermeable areas, hence, without mitigation measures, flooding risk from surface water will increase. However, with the adoption of sustainable drainage techniques this risk will be adequately mitigated to ensure no significant impacts arise. It is anticipated that attenuation will be provided within the Site in below ground proprietary storage systems. It is proposed that the northern car parking bays will include a granular underlayer. Surface water runoff from this part of the Site is proposed to be stored in the granular layer before it is passed downstream to the surface water drainage system. This will provided a degree of attenuation and reduce the peak runoff rate from the car park. Surface water runoff from the remainder of the Site is proposed to be passed through catch pits and oil separators before entering the below ground attenuation storage before discharging into the River Arun.</p> <p>The attenuation storage systems will be sized to manage the runoff from rainfall events up to 1 in 100 years with climate change allowance.</p> <p>As such, through the design layout of the proposal, the use of appropriate mitigation measures and the incorporation of sustainable drainage systems, the proposed development is not likely to result in significant effects related to flood risk and hydrology.</p> <p>Climate Change</p> <p>The proposed development will result in greenhouse gas emissions from both vehicles and plant, during both the construction and occupation phases. In line with current and emerging guidance and standards, such emissions will be minimised through the adoption of best practice working and construction methods. Such measures would be delivered through a detailed CEMP (during construction). These measures will help to reduce the carbon footprint of the development which aims to achieve a reduction in carbon emissions. Taking into account the above, and the nature and size of the proposed development, significant effects related to climate change are considered unlikely.</p>
<p>g) The risks to human health (for example, due to water contamination or air pollution)</p>	<p>Water Contamination</p> <p>It is proposed that runoff from areas where fire appliance vehicles and tankers stand for re-fuelling will be isolated and include an automated cut-off valve.</p>

Areas of the Site used for fire-fighting training will be appropriately treated so that runoff containing potential pollutants generated during training is not conveyed into the clean water system, but to a separate self-contained drainage system with discharge to an on-site tank.

When fire-fighting training is in progress using potential polluting substances, an automated control valve will be activated to direct runoff to a holding tank from where the contaminated runoff will be discharged either to the on-site foul pumping station or removed to a tanker vehicle.

It is proposed that foul effluent from the fire station will be discharged via gravity sewers to a foul pumping station, located adjacent to the parking area in the north of the Site.

As such, the proposed development is considered unlikely to pose a significant risk to human health due to water contamination.

A Surface Water Drainage Strategy will be submitted as part of the planning application which is designed to mitigate against potential impacts of the proposed development.

Traffic

During the construction phase, an increase in traffic movements, and in particular HGV's, could present an increased accident risk on the local road network. However, given the scale of the development and the implementation of temporary construction traffic controls, it is not considered that a significant risk will arise. Therefore, this consideration could be suitably addressed through the planning application process.

During the operational phase, traffic is not considered to increase to a magnitude that would significantly impact the safety of the surrounding road network. The level of traffic expected to be generated, coupled with the location of the Site in close proximity to and with direct access to the Strategic Road Network, means that significant effects related to traffic are not considered likely to result.

Parking for cars and cycles will be provided in accordance with WSCC parking standards as appropriate.

Noise

Exposure to prolonged or excessive noise has been shown to cause a range of health problems ranging from stress, poor concentration, productivity losses in the workplace, and communication difficulties and fatigue from lack of sleep, to more serious issues such as cardiovascular disease, cognitive impairment, tinnitus and hearing loss.

During the construction, the proposed development will introduce new sources of noise into the environment through vehicle use and machinery. However, as discussed above, these impacts are not considered to be of a magnitude large

	<p>enough to cause adverse effects on people’s health. Relevant health and safety legislation regarding noise at work will ensure construction workers are not exposed to unacceptable noise levels. Furthermore, noise impacts during the construction phase will be reduced through the implementation of standard best practice measures, such as limiting idling vehicles and establishing temporary noise bunds, which will be secured through a CEMP, subject to a suitably worded planning consideration.</p> <p>During the operational phase, the sound pressure levels are expected to vary across the Site with the areas closest to the A24 being worst affected. However, it is considered that these noise sources are within acceptable limits to ensure that the Site is suitable for the proposed uses and adverse health impacts on future occupants do not arise. Furthermore, design and materials used within the proposed development, such as mechanical ventilation, will ensure that internal noise levels for future occupants are compliant with all noise regulations to protect human receptors.</p> <p>Air Quality</p> <p>Potential construction phase air quality impacts from fugitive dust emissions and construction traffic could occur as a result of earthworks, construction and trackout activities. It is predicted that, as the Site is currently wholly undeveloped greenfield land, the lack of demolition works to be carried out will reduce the magnitude of dust emissions to negligible for this stage of the development. During the construction phases of the development, the implementation of mitigation measures such as wheel washing will reduce the dust emissions generated to within acceptable levels. It is therefore understood that the impact on Human Health will not be significant.</p> <p>During the construction phase of the proposed development, all legislative requirements will be met. As such, construction practices will be suitably managed in accordance with best practice and/or existing management systems, to avoid impacts upon health and wellbeing.</p> <p>During occupation, a ventilation strategy for the incorporated for the buildings to maximise the use of natural ventilation, where possible. The appliance bay will have a specialist exhaust system for the appliances, complete with suitable attenuation.</p>
<p>2. Location of development</p>	
<p>a) The existing and approved land use</p>	<p>The current nature of the site as grassland is such that there is limited risk of contamination. Whilst the proposed development will result in a change to a more intensive use, particularly in respect of traffic, the proximity of the Site to the A24 and the high quality access will ensure that significant effects do not result from the proposed development.</p>

<p>b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground</p> <p>c) The absorption capacity of the natural environment</p>	<p>In relation to criteria 2 (b) and (c), the site is not subject to any statutory environmental, landscape or heritage designations. Consideration is given below to potential environmental impacts by virtue of the site's location. Consideration has been given to any high quality and scarce resources on and around the Site which could be impacted by the development.</p> <p>Landscape and Visual</p> <p>The location of the Site is on the suburban edge of Horsham, and is bordered by an A road. Although the Site itself is a green field, to the north, east and south is existing residential development and the scope for sensitive receptors is limited. The live fire training facility will be located in the south-west corner of the Site furthest away from the existing residential buildings to the east/north-east of the Site.</p> <p>Archaeology and Built Heritage</p> <p>There are no designated built heritage assets on site, although nationally listed buildings are located within 700m of the Site, as set out in the Site description. On the basis that these assets are located within an area already characterised by built development, it is considered that the proposals will not have any significant effects on their setting or enjoyment.</p> <p>It is considered that the proposed development can be accommodated without significant environmental effects on the archaeological resource. The County Archaeologist confirmed in writing on 30 May 2018 that <i>"in short, all archaeological issues on the Site have been addressed"</i> as part of the adjacent Highwood residential development and <i>"no further archaeological mitigation should be needed on this site"</i>.</p> <p>During construction, standard best practice working methods can be followed to ensure that, should any significant archaeological assets be discovered, appropriate measures are in place to ensure adverse impacts are avoided.</p> <p>Biodiversity</p> <p>No ecological designations are located within or adjacent to the Site, whilst the nearest such designation, Slinfold Stream and Quarry Site of Special Scientific Interest (SSSI), is located approximately 2.8km west of the Site. No European designations are located within 10km of the Site. Accordingly, no significant effects would occur in relation to ecological designations.</p> <p>As noted on page seven, Bats, GCN and reptiles were confirmed present at the Site.</p> <p>In the case of GCN, a European Protected Species Mitigation (EPS) licence would be sought from Natural England at the appropriate stage. A GCN Mitigation Strategy is currently being prepared and will be submitted as part of the planning application.</p> <p>During construction works, mitigation measures are likely to include protective fencing and a CEMP to reduce effects of</p>
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dust, noise and hydrology. At the occupation stage, the sensitive design of lighting and replacement planting and habitat creation will be considered. Such measures would avoid any significant effects in relation to the above species.

Noise

Background noise levels on the Site are principally characterised by road traffic noise. However, as described above, the nature of the proposed development is such that it is not considered likely to materially alter background noise levels, therefore no significant impacts are considered likely.

Flood Risk and Drainage

The proposed development will increase the impermeable areas, hence without mitigation measures flooding risk from surface water will increase. However, with the adoption of sustainable drainage techniques, this risk will be adequately mitigated to ensure no significant impacts arise.

The presence of heavy plant and other vehicles onsite introduces the potential for spillages, for example, diesel and hydraulic fluids, wet concrete, construction chemicals and wash-down wastes. Contaminants could enter the sub-soils, surface water, groundwater and watercourses via infiltration and surface water runoff. However, with standard mitigation in place it is considered that this can be suitably avoided. A CEMP will be prepared to provide details for the appropriate storage and handling of fuels, liquids and emergency actions to take in the event of spillages.

Through the design layout of the proposal, the use of appropriate mitigation measures and the incorporation of sustainable drainage systems, the proposed development is not likely to result in significant effects related to flood risk and drainage.

Socio-Economics

The proposed development would result in economic benefits during the construction period and operational phase, including the creation of jobs and growth of the local and wider economy, and also local community benefits with the creation of a new fire station.

Air quality

As discussed above, the proposed development is not considered to give rise to significant air quality impacts, therefore no material changes are considered likely within the surrounding area, ensuring the receiving environment is able to accommodate the proposals.

3. Types and characteristics of the potential impact	
a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	The magnitude and spatial impact would be limited to the Site and its adjoining land. Whilst residents adjacent to the Site will be affected by the proposed development during the construction phase, this would not be significant following the implementation of best working practices through the CEMP and CCS.
b) The nature of the impact;	As discussed above, the Site and proposed development are such that significant effects are unlikely to result. The proposed development is of a scale that the local highway network can sustain and mitigation and safeguarding measures mean that no significant ecological impacts are likely to be realised. Development of undeveloped sites inevitably has as local visual and landscape impact, however, in the context of the Site and the wider area, this is not thought to be a significant in the long term and may bring benefits through landscape repair.
c) The transboundary nature of the impact;	Impacts are unlikely to be transboundary, given the scale and nature of the proposed development. Although there is a potential for future occupants to travel from outside of the district to the Site, the magnitude of this change is not considered large enough to give rise to any transboundary impacts.
d) The intensity and complexity of the impact;	The overall impact of the proposed development is predicted to be of a normal intensity and complexity for a scheme of this size and nature. As discussed above, the anticipated developmental effects can be managed effectively through the implementation of standard mitigation measures to be secured through planning conditions.
e) The probability of the impact;	All of the potential impacts and their probability are understood and predictable. With the relevant mitigation measures discussed above, none of the potential impacts are considered likely to result in significant effects.
f) The expected onset, duration, frequency and reversibility of the impact;	The potential for temporary impacts to arise during the construction phase have been outlined above. However, these will be minimised through adherence to best working practices. The duration and reversibility of some proposed impacts, particularly in relation to landscape, would be considered permanent (but not significant) as the proposed development is intended to be a high quality, sustainable, long-term construction and there is no expectation with regards to decommissioning. Once the development is operational, the impacts of the development will not be significant in the context of other land uses in the immediate area.
g) The cumulation of the impact with the impact of other existing and/or approved development;	The possibility of cumulative impacts has been considered in association with selection criteria 1(b). It is possible that construction activities for the proposed development may run concurrently with near committed schemes, therefore the potential construction impacts discussed above would be similar in nature and may act upon similar receptors. However, it is considered that through the use of standard mitigation measures these would not be significant, and would in any case be temporary in nature. Once operational no adverse significant effects are considered likely.

<p>h) The possibility of effectively reducing the impact</p>	<p>As no adverse significant effects are considered likely to arise, consideration of the probability of effectively reducing impacts is not determinative in this case. Nevertheless, as discussed above, the potential impacts associated with the proposed development can be mitigated through the use of best practice construction methods and the implementation of typical mitigation measures (details of which can be found in the technical assessments submitted with the planning application). During the construction phase such measures would be controlled through a CEMP. The technical reports that will accompany the planning application will identify appropriate mitigation measures for operational impacts that can be secured as part of the application submission, subsequent planning conditions and legal agreements.</p>
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Conclusions

The proposed development does not qualify as a Schedule 1 development and is not located wholly, or partly, within a 'sensitive area' as defined in Regulation 2(1). However, it does fall within the description of 'Infrastructure Projects (b) Urban Development Projects' within the first column of Schedule 2 of the Regulations and exceeds the thresholds in the second column as the proposal includes more than 1 hectare of non-dwellinghouse development.

To determine whether the proposed development comprises EIA development, it is necessary for the local planning authority to consider whether it is likely to have significant effects on the environment, taking account of the selection criteria in Schedule 3 of the Regulations.

Our assessment concludes that the characteristics and location of the development are unlikely to give rise to significant environmental effects, alone, or in accumulation with other developments. Furthermore, as set out in this letter, with the implementation of suitable design alongside mitigation and avoidance measures, drainage design and best practice construction methods, it is considered that significant environmental effects are unlikely to arise and therefore the proposal would not constitute EIA Development under the EIA Regulations.

We request that, in accordance with the EIA Regulations, WSCC provides a formal EIA Screening Opinion within the requisite three weeks.

Any effects, whether local or otherwise, can be satisfactorily addressed through supporting information accompanying the planning application, which can be controlled by condition, such that significant effects are unlikely and any environmental considerations and constraints can be suitably addressed. It is envisaged that the planning application will be supported by a series of technical reports.

Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion.

Yours sincerely



Peter Warren
Savills Planning

Enc.

Figure 1 – Site Location Plan
Figure 2 – Draft Site Plan