

Horsham District Council Screening Assessment

HDC Reference EIA/26/0004

Applicant Reference: 19.139/9.Applications

Development Proposal: Up to 450 dwellings, including 35% affordable housing; A mixed-use local centre with a range of local services and amenities; A new primary school; A flexible work space building; The creation of an internal street network, including pedestrian and cycle routes; A new junction connecting the site to the A29 and the redevelopment of the existing access from Lordings Road; New areas of accessible public open space including the formation of a large green space to the south and new planting as a part of a wider green infrastructure network on the site; and Drainage infrastructure, including sustainable drainage features ('SuDS').

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; more than 1 hectare of urban development for non-dwellinghouse development with car parking, access roads and Class E units.
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)	Arun Valley Special Protection Area ('SPA'), approximately 6.8km south-west. The Mens Special Conservation Area ('SAC'), approximately 3.3m north-west Ebernoe Common SAC, approximately 8.6km west.

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 lies within the countryside West of Billingshurst. It is divided from the Built-up Area Boundary of Billingshurst by the A29 and a narrow field strip. Much of the southern boundary adjoins Ancient Woodland, it also wraps around a sewage works. It lies adjacent land also promoted for development (SA744 and SA642) but has not been promoted as part of the wider strategic development west of Billingshurst.</p> <p>It is rural in nature, comprising of agricultural fields, which are bound by hedgerows and gently slope down towards the south. Public Rights of way cross the site. A watercourse within hedgerow runs through the site and to the south.</p> <p>The submission material is accompanied by no parameter plan or accompanying design principles; design principles do not therefore form part of the description of the development.</p>	Significant and/or residual environmental impacts anticipated

	<p>No detail on the environmental effects of the Proposed Development assessed for the construction stage is provided, including site preparation, earthworks and construction.</p> <p>In Development Proposals of this size and design, to understand worst-case effect, full description of the design principles and nature and scope of Peak construction and Operation, including the types of activity, their frequency, and how works will be carried out for all elements of the Proposed Development would be expected. This includes the construction phase, not just operational phase.</p> <p>A Screening exercise of the effects should be based on description of the Proposed Development which will include mitigation. Significance will only be concluded for residual effects (i.e. following the implementation of mitigation or enhancement).</p> <p>However, in the submission material Mitigation is not fully identified and developed – Primary mitigation – modifications to the location or design of the Proposed Development made during the pre-application stage that are an inherent part of the project; Secondary mitigation – actions that will require further activity in order to achieve the anticipated outcome and secured by planning condition / and or obligation; and Tertiary mitigation – actions that would occur with or without input from the EIA feeding into the design process.</p>	
<p>b) cumulation with other existing or approved development</p>	<p>A Screening exercise of the effects should identify the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The submission material does not do this; the following types of projects should be included in such an assessment (subject to available information):</p> <ul style="list-style-type: none"> a. existing completed projects; b. approved but uncompleted projects; c. ongoing activities; d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects. 	
<p>c) the use of natural resources, in particular soil,</p>	<p>The proposed construction and operational phases of the proposed</p>	

No significant and/or

<p>water and biodiversity (e.g. land, water, materials, energy – non renewable or in short supply?)</p>	<p>development will use resources in terms of land, water and energy as would be expected for a retail development of the nature proposed. The Applicant can include measures in the CEMP to minimise the consumption of natural resources.</p> <p>During construction, some minor topographical changes will occur to facilitate a SUDS scheme. Whilst some topographic changes will occur these will be minor changes in the landscape to facilitate better drainage of the scheme. These changes are considered insignificant in relation to the natural topography of the area.</p> <p><i>Minerals</i> The location of the site is within the mineral safeguarding area for Weald brick clay. Whilst it is agreed the priority of the safeguarded resource is relatively low (given its relative abundance), the development site occupies a significant area, and the potential quality and quantity of the underlying resource remains unknown at this stage.</p> <p>Matters of detailed design offer opportunities for sustainable design and construction in line with local and national policies.</p>	<p>residual environmental impacts anticipated</p>
<p>d) the production of waste (demolition, construction, operation and decommissioning?)</p>	<p>As with nearly all construction, the proposed development will result in waste materials from the preparation and undertaking of works. Construction waste would be reused and recycled where possible. Significant quantities of construction waste are not anticipated because of the proposed development. Construction waste would be managed in accordance with all applicable legislation and disposed of in line with best practice. Operational waste would be disposed of in line with HDC requirements and managed in accordance with all applicable legislation.</p>	<p>No significant and/or residual environmental impacts anticipated</p>
<p>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>	<p><i>Construction Phase</i> 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, including nearby residential development.</p> <p>Any impact 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).</p>	<p>No significant and/or residual environmental impacts anticipated</p>

	<p>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. There may be some minor adverse impacts on habitat within the scheme, which will be minimised through sensitive master planning.</p> <p>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.</p> <p>A CEMP, to be agreed with HDC and secured through a suitable planning condition, 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.</p> <p><i>Operational Phase</i></p> <p>There would also be emissions associated with the operational phase of the proposed development. The local road network in Billingham has seen significant alteration in recent years (A272 Hilland Road). However, the A29 itself has not.</p> <p>As the A29 has not been subject to significant modification, there is uncertainty to pollution and nuisance (Air quality and Noise) impacts associated with the additional traffic from the Proposed Development.</p>	
<p>f) the risk of major accidents and/or disasters including those caused by climate change, in accordance with scientific knowledge</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 such as Land stability and Climate. 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. The site is not in an area known to be susceptible to severe winds, fog or temperate inversions, subsidence, landslides or erosion.</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>	<p>No significant and/or residual environmental impacts anticipated</p>

<p>g) The risks to human health (eg due to water contamination or air pollution)</p>	<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 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>No significant and/or residual environmental impacts anticipated</p>
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<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</p>	<p>Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)</p>	<p>Significance</p>
<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 /</p>	<p>The site is located to the west of Billingshurst and is predominantly agricultural in use. It is enclosed by a network of mature hedgerows with intermittent hedgerow trees, small woodland blocks, and tree-lined boundaries. These features are typical of the site's rural setting, and collectively they form an established green infrastructure framework, contributing to landscape character and ecological connectivity within the area. It slopes gently down from north to south.</p> <p>The site is located within the Low Weald National Character Area and J1: Billingshurst & North Heath Farmlands Horsham District Local Character Area. These Areas are identified as being predominantly agricultural and has many densely wooded areas with a high proportion of Ancient Woodland. There are views from the footpath network which crosses the site.</p> <p>The site is very rural in character and the presence of the A29 limits the relationship of this landscape with the existing</p>	<p>With mitigation, no significant and/or residual environmental impacts anticipated.</p>

<p>designations / protected species – would development lead to irreversible loss of key qualities or resources in the area?)</p>	<p>built form. Development in this location would therefore have a significant impact on the landscape and visual impact.</p>		
<p>c) the absorption capacity of the natural environment, paying particular attention to</p>		<p>i) wetlands, riparian areas, river mouths (e.g. floodplains, impacts on drainage, aquifers)</p>	<p>Cedar Brook traverses the site, in a central location, routed roughly west-east. Cedar Brook is identified as an Environment Agency Main River. According to the Environment Agency (EA) Flood Map for Planning, along its course, land within the site is subject to Flood Zone 2 and 3 (fluvial flood risk). Additional areas of the site are potentially vulnerable to surface water flooding (1 in 30 year). There is no evidence to date that the effects in relation to surface water and hydrology have been assessed in full.</p> <p>The Site is in the Sussex North Water Resource Zone (SNWRZ). Southern Water supplies potable water within the SNWSZ from an abstraction source at Pulborough.</p> <p>Southern Water's Billingshurst Wastewater Treatment Works (WwTW) is located immediately adjacent to the Site and treats wastewater flows from surrounding development.</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 woodland / TPOs).</p>	<p>The submission material refers to woodlands and hedgerows but makes no substantive reference to veteran trees, nor any dedicated assessment of their potential presence, which is highly likely given the rural context of the site and the high likelihood of over-mature hedgerow oaks within field boundaries.</p> <p>It is anticipated there to be potential removal of sections of hedgerow and boundary trees to facilitate access points, internal road alignments, and development plateaus.</p> <p>An Ancient Woodland, Great Lordings Wood, adjoins the southern boundary of the site.</p>	<p>With mitigation, no significant and/or residual environmental impacts anticipated</p>	

<p>iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)</p>	<p>The site is not subject to statutory or non-statutory designation for ecological interest. Parcels of ancient woodland (irreplaceable habitat) border the site.</p> <p>Setting of the South Downs National Park The setting of the South Downs National Park is a constraint that is not identified in the submission material, despite this being a constraint that cuts across multiple topic areas, in particular landscape and views, ecology/biodiversity, and socio-economic. In particular lighting and impacts on the National Park Dark Skies Reserve.</p> <p>Although the application site is located outside of the National Park, given the scale of the proposed development, and its situation on lower-lying ground, it has the potential to lie within its setting.</p> <p>The Council has a statutory duty to consider the Purposes of the National Park when making its determination. The two statutory purposes of the SDNP designation are: To conserve and enhance the natural beauty, wildlife and cultural heritage, To promote opportunities for the public understanding and enjoyment of the special qualities of their areas. If there is a conflict between these two purposes, conservation takes precedence. There is also a duty to foster the economic and social wellbeing of the local community in pursuit of these purposes. It is likely mitigations would be needed to address these duties.</p> <p>Section 245 of the Levelling-Up and Regeneration Act 2023 (S.245 duty) amends and strengthens the Section 11A (2) duty of the National Parks and Access to the Countryside Act 1949 upon relevant authorities, which includes the National Park Authority itself, to 'seek to further the specified purposes of Protected Landscapes'.</p>	<p>With mitigation, no significant and/or residual environmental impacts anticipated</p>
<p>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</p>	<p>The site is located within The Mens SAC/SSSI Bat Sustenance Zone. The Mens SAC/SSSI is located to the west of the site. The Mens SAC/SSSI comprises mature beech woodland which supports Barbastelle bats (a European Protected Species). An Appropriate Assessment screening under the Habitats Regulations would be required on this Project.</p> <p>The site is located within the Arun Valley Special Protection Area/Special Area of Conservation/Ramsar Water Supply. Impacts on water usage of proposed development within the district related to The Arun Valley Sites still require a Habitat Regulations Appropriate Assessment to be undertaken to the Project. https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district</p>	<p>With mitigation, no significant and/or residual environmental impacts anticipated</p>

valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European protected species present that can be affected?)		
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).	N/A	N/A
vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment etc)	The site located within the administrative boundary of HDC which forms the Local Impact Area. There is relatively high level of socio-economic containment within this geography. The built-up area boundary of Billingshurst is defined as a Large Village / Small Town, having a good range of services and facilities. There are schools, a GP surgery, and leisure centre in the settlement. The local sustainable travel network includes PRow, bus routes. There is a railway station in Billingshurst, on a direct line to Horsham and London. There is a village centre to Billingshurst.	No significant and/or residual environmental impacts anticipated
viii) landscapes of historical, cultural or archaeological significance	There are no Listed Buildings, Registered Parks and Gardens, World Heritage Sites, Conservation Areas, or Scheduled Ancient Monuments, or Archaeological Notification Areas on or adjacent to the site.	No significant and/or residual environmental impacts anticipated
3. Types and Characteristics of	Description	Significance

<p>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:</p>		
<p>a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)</p>	<p>The size and nature of the Proposed Development mean impacts are not confined to the site and impact land beyond.</p> <p>Impacts arise to the settlement of Billinghamurst in its entirety, the local highway network beyond, The Mens SAC including ammonia issue, Arun Valley Sites, and South Downs National Park setting including lighting and Dark Skies Reserve.</p>	<p>Significant and/or residual environmental impacts anticipated</p>
<p>b) the nature of the impact</p>	<p>Given the scale of the development, there would be an increase in HGV construction traffic movements; increase in noise, particularly during site construction. At operational phase, the increased residential population and traffic generated by the development would impact on local infrastructure, including services and facilities within Billinghamurst settlement.</p> <p>It is unclear from the submission material if the quantity of Best and Most Versatile land on the site does not exceed the Natural England consultation threshold. Construction activities to support the Proposed Development will result in the permanent loss of agricultural land, with potential implications for food production. Soil is a finite resource that fulfils many important functions and services for society in addition to the production of food and fibre, and it is important that soil resources are conserved and enhanced. During the construction stage, damage to, and loss of, topsoil could occur.</p> <p>The development has the potential to lead to impacts on landscape character, landscape resources and visual amenity. In terms of visual amenity, there are currently locations where the likely visual impact can be assessed. This includes the site's potential when considered cumulatively with other projects, to fall within the setting of the South Downs National Park, how currently contributes to that setting, and how the proposals will be sensitively located/designed to avoid or minimise adverse impacts up on the setting.</p> <p>Identified ecological considerations include potential for impacts upon the Mens and Ebernoe Common SACs, and the Arun Valley Sites.</p> <p>Given the scale of the development, impacts of lighting (both during and after construction). Lighting considerations will be important to assess impacts on nocturnal species, as well as upon the South Downs International Dark Skies</p>	<p>Significant and/or residual environmental impacts anticipated</p>

	Reserve.	
c) the transboundary nature of the impact (any international impacts?)	None	N/a
d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)	<p><u>Socio-Economic and Transport</u> Billingshurst which is classified as a large village / small town, having a good range of services and facilities with strong community networks and local employment provision, together with reasonable rail and bus services. It acts as a hub for smaller villages but also has some reliance on larger settlements to meet some of the resident's day to day needs. The site is not easily accessible to these services as there would be a requirement to cross the busy A29 bypass. Without further upgrades or new facilities, development of this scale is likely to increase pressure on existing facilities within the village. The Weald Community School and Sixth Form in Billingshurst is at pupil capacity.</p> <p>Socio-economic impacts of proposed traffic generation, traffic future growth, PRow management at crossings and the likely requirements for possible road closures and temporary traffic lights.</p> <p>The screening submission is not accompanied by desk based study of publicly accessible social and human health data (data should be obtained) with modelling needed to be conducted to establish need for to education facilities [as the emerging local plan allocation and the 1,000 dwelling site promotions both put forward primary schools]; significance of effect on impacts (trade draw) arising from the local centre on the existing village centre; access to healthy food; and social cohesion.</p> <p>Needs to be demonstrated environmental constraints data sets PRowS (not just Major Roads) used to feed into process.</p> <p><u>Landscape and Visual Effect</u> The overall scope of the assessment will involve the determination of Landscape and Visual Impact Assessment (LVIA) methodology and significance criteria; Zone of Theoretical Visibility to determine viewpoints. <i>Effects likely/significant</i> Effect; Changes to landscape character Receptor; site and local landscape character.; Applicable stages; construction/operation. Effect; Changes to visual amenity of visual receptors within 750 metres of the Site. Receptors; Users of the PRow routes. Applicable Stages; Construction/operation.</p> <p><u>Water Resources</u> The Proposed Development has the potential for effects on flood risk, water pollution, and potable water demand.</p> <p>The internal spine road is shown on the indicative masterplan to need to cross Flood Zone 2 and 3, so there is uncertainty to meeting the Sequential Test for Flood Risk of National Planning Policy as to whether this is safe access,</p>	<p>Significant and/or residual environmental impacts anticipated</p>

with flow routes maintained with sufficient capacity to manage flows without an increase in flood risk.

- *Water Pollution*

Construction activities will be controlled through implementation of a CEMP incorporating pollution prevention measures in accordance with Environment Agency guidance and Construction (Design and Management) Regulations 2015. These measures will include appropriate storage of materials, fuel and chemicals, implementation of emergency spill procedures, and protection of surface water drainage systems.

Operational pollution risks are minimal given the residential nature of the development. Surface water drainage will incorporate appropriate treatment measures through the appropriate SuDS design, incorporating a Surface Water Management train in line with the current national 'Non-Statutory Guidance'53 and local Lead Local Flood Authority policies, to ensure water quality protection before discharge to receiving watercourses.

Foul wastewater flows from the Proposed Development will discharge to the public foul sewer network which drains to the WwTW. These are the statutory responsibility of the incumbent water authority, Southern Water.

- *Effects Likely/Significant*

Effect; Increased potable water demand on Southern Water supplies affecting abstraction volumes at Pulborough. Receptor; Arun Valley Special Area Conservation (SAC); Arun Valley Special Protection Area (SPA); Arun Valley Ramsar Site. Applicable Stage; Construction and Operation

On 31 October 2025 Natural England withdrew its position statement for planning applications within the Sussex North Water Supply Zone. The withdrawal of the statement followed agreement between Natural England, Southern Water and the Environment Agency that a reduction in the licence cap on water abstraction will ensure that the protected Arun Valley habitats identified above are not adversely affected. Through consultation with Horsham District Council it has been confirmed that in advance of implementation of the licence change the potential effects on the protected Arun Valley habitats must still be considered within an EIA. The SNWSZ remains in an area of serious water stress.

Biodiversity

It is important that full consideration to the nature conservation sites is given. The site lies approximately 6.5km west of The Mens Special Area of Conservation (SAC) (MAGIC maps) is therefore within the 6.5km Key Conservation Area for this SAC, within which all impacts must be assessed as the habitats within this zone are considered critical for sustaining the populations of Barbastelle bats within the SAC, the qualifying feature of the SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). The site lies approximately 6.6km west of Ebernoe Common Special Area of Conservation (SAC) and therefore lies within the 12.0km Wider Conservation Area for this SAC, the desk study returned one record for Bechstein's bat located within 2 kilometres of the site.

The Significance of The Mens SAC is given the findings of the emerging Local Plan's HRA and Air Quality Addendum. By way of reasoning and likely issues these include not just bats but also potential effects of nitrogen deposition from

	<p>combustion engine motor traffic whereby if the Transport Assessment concludes the number of HGVs using the A272 at the Mens SAC will increase to or above 200 HGVs per day then measures will be necessary to reduce this to less than 200 or ensure Euro6 standard compliance; ammonia given that the emerging Local Plan's HRA identified an issue with ammonia at The Mens SAC resulting in the strategic allocation at Land East of Billingshurst being required to provide electric vehicle charging points for all car parking spaces.</p> <p>It is recommended regard be given to the requirements of the HRA in respect of the emerging Local Plan's strategic allocation of Land East of Billingshurst and the resultant policy HA4 requirements. It should be noted that these are considered soft measures and if not implemented then a charge on developers may be required for hard measures to be put in place, and monitoring of vehicles undertaken along the A29 past The Mens SAC.</p> <p>The contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas. This includes Wilder Horsham, Weald to Waves, emerging West Sussex LNRS, Biodiversity Opportunity Areas (BOA).</p> <p><u>Odour</u> The potential for odour to affect the Proposed Development should be considered from the outset and the outcomes of an odour assessment in line with relevant guidance (i.e. IAQM: Guidance on the assessment of odour for planning assessment identified a series of odour contours from the WwTW within which residential development is unlikely to be acceptable to Southern Water, and any application with development would be subject to an objection to potential future odour complaints. Accordingly, all built residential development has been removed from the most stringent 1.5ouE/m3 contour. This goes over and beyond the 3.0ouE/m3 recommended by published guidance, within which odour would be unacceptable to future residents of the Proposed Development.</p> <p><u>Noise</u> Certain parts of the proposed development are near the heavily trafficked A29, and industrial units at Platts Roundabout, the latter of which has recently been given permission for 24-hour use – noise from these offsite sources are therefore potential constraints to development.</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.</p>	<p>Significant and/or residual environmental impacts anticipated</p>
<p>f) the expected onset, duration,</p>	<p>The screening submission does not identify phasing nor duration of construction phase. The scale of the Project is suggestive of several years Construction effects would therefore be temporary – intermittent and Frequent and</p>	<p>No significant and/or</p>

<p>frequency and reversibility of the impact (demolition, construction, operation and decommissioning)</p>	<p>reversible. Operational effects would be permanent – continuous and irreversible.</p>	<p>residual environmental impacts anticipated</p>
<p>g) the cumulation of the impact with the impact of other existing and/or approved development</p>	<p>The Screening submission does not detail effect interactions nor in-combination effects. Given the cumulative development in the vicinity, there is a need to identify potential effect interactions (ideally within a matrix) to both construction and operational stage of the Proposed Development.</p> <p><i>Identification of potential effect interactions</i> The threshold for inclusion within the matrices should be set at a ‘minor’ level of effects that are necessarily considered to be ‘Significant’ in isolation to become ‘Significant’ when they are considered collectively on a common sensitive receptor.</p> <p><i>Qualitative appraisal methodology of effect interactions</i> A qualitative assessment of the cumulative effects on the identified receptor categories should be undertaken.</p> <p><i>Identification of projects for consideration In-combination effects</i> A review of the HDC’s online register should be undertaken, focused on projects and therefore is not inclusive of sites allocated within local plans, core strategy documents or supplementary planning documents. Proportionality applied, means a focus within 1.5km of the Site; applications dating from 2020 onwards; determined positively; refused but at appeal; projects of a pertinent scale.</p> <p>Even granted outline consents (or subsequent reserved matters approvals) are part of the baseline for assessing significant environmental effects, ensuring the full picture of development in an area is captured. It is considered this should include and take into account all permitted and allocated sites including those in the emerging Local Plan.</p> <p>Cumulative Effects should include:</p> <p>DC/20/2607 Outline Application for the development of 83 residential units, landscaping, access, parking and associated infrastructure on land at Duckmoor, East Billingshurst with all matters reserved except access. Land at Duckmoor East of Billingshurst Billingshurst RH14 9DZ</p> <p>DC/24/0768 Reserved matters application for the erection of 83No. dwellings, open space and child play provision, residential parking facilities and associated infrastructure, including access arrangements following outline application DC/20/2607, relating to layout, scale, appearance and landscaping. Land at Duckmoor Farm, East of Billingshurst Billingshurst RH14 9DZ</p>	<p>Significant and/or residual environmental impacts anticipated</p>

ID	Planning Reference	Name, Address	Description	Distance and direction from Site	EIA Development?	Status
1	DC/23/2103	New Rural Business Park at Hilland Farm, Billingshurst Hilland Farm Hilland Road Billingshurst West Sussex RH14 9HN	Erection of Business Park following demolition of existing redundant farm buildings	Adjacent to the east	No	Application Permitted
2	DC/24/0749 Appeal ref: 3361285	Land at Hilland House, New Road, Billingshurst Hilland House New Road Billingshurst West Sussex	Outline Application for redevelopment of the site to provide up to 125 dwellings, ancillary parking new landscaping and open space, an ecological and woodland park together with associated works and landscaping with all matters reserved except access.	Adjacent to the east	No	Application Permitted on Appeal
3	DC/22/0518	Land at Platts Roundabout, Newbridge Road, Billingshurst Land Parcel at 507911 125837 Newbridge Road Billingshurst West Sussex	Outline Application for redevelopment of the site to provide flexible employment space (Use Classes E(g)(ii) and (iii), B2 and B8) totalling 4,627sqm, ancillary parking and circulation space with all matters reserved except access and layout	Adjacent to the Site	No	Application Permitted
4	DC/25/1910	Land at Hilland Farm, Billingshurst	Outline planning permission for up to 125no. homes and associated	100m to the east	No	Pending Approval

ID	Planning Reference	Name, Address	Description	Distance and direction from Site	EIA Development?	Status
		Land East of Billingshurst Business Park (Phase 2) Stane Street Billingshurst West Sussex RH14 9HN	infrastructure/green space with all matters reserved apart from access.			
5	DC/25/1697	Billingshurst Business Park Billingshurst Business Park (Phase 2 & 3), Stane Street, Billingshurst	Hybrid application comprising: Mixed use development, including detailed permission for means of access and 1,338 sqm business floorspace with the remainder of the development in outline, comprising up to 102no. homes and up to 5,605 sqm of business floorspace (Classes E g (iii)/B2/B8).	100m to the east	No	Pending Approval
6	DC/25/0458	Land to the South of Billingshurst Business Park Land At 509354 126590 Hilland Road Billingshurst West Sussex RH14 9HN	Workshop, storage building with associated vehicular parking, yard area and access.	30m east	No	Application Permitted
7	DC/24/1581	Land to the north of Marringdean Road, Billingshurst	Outline planning application for up to 79 Dwellings (including affordable homes) with all matters reserved except for access.	700m east	No	Application Permitted

ID	Planning Reference	Name, Address	Description	Distance and direction from Site	EIA Development?	Status
		Land at 508967 124469 Marringdean Road Billingshurst West Sussex				
8	25/00658/FUL	Wisborough Solar Farm Land To The South, South West And North West Of Malham Farm And North West Of Oakwood Farm Newpound Wisborough Green Billingshurst West Sussex RH14 OAP	Proposed construction, operation and decommissioning of a solar farm and associated infrastructure.	1.8km to the north west	No	Pending Approval
9	DC/17/0177	Brinsbury Fields, Brinsbury Campus Brinsbury Fields Brinsbury College Pulborough	Outline planning permission (with all matters reserved except for access from Stane Street (A29)) for up to 6 commercial buildings comprising a mix of B1, B2 and B8 Use Classes	2.3km to the south	No	Application Permitted

Advice to be sought from the Local Highway Authority, in regard to junction capacity at Buck Barn (A24/A272), but potentially the ES should identify recent house large-scale building in Southwater (including 540 units at Broadacres DC/14/0590).

Large-scale building in Southwater (Transport and Socioeconomic considerations (education provision)):

DC/26/0366|Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
Land North West of Southwater

DC/23/1178

	<p>Outline planning application with all matters reserved save for access for the development of a Sports and Leisure Hub including the provision of communal facilities, nursery, Golf College, sports club house (containing Health & Fitness spa, changing facilities and food & beverage) and an educational facility for Warren Clark Golfing Dreams (Use Classes E, F1 & F2); a local centre containing a convenience store and co-working space (Use Classes E & F2); the provision of supporting landscaping, open space and related infrastructure; outdoor sports and leisure provision comprising Driving Range, reprovision of golf (including supporting golf facilities) and hockey (including pitches and training area) (Use Class F2) and up to 800 dwellings (Use Class C3). Horsham Golf Park Denne Park Horsham West Sussex RH13 0AX</p> <p>The emerging Local Plan is at Examination stage which includes a strategic site allocation at Land East of Billingshurst which is not showing on the cumulative project plan. The strategic allocation at Land East of Billingshurst is for 650 dwellings (35% of which to be affordable), a permanent Gypsy and Traveller site for 5 pitches, community hub, c.0.5ha employment floorspace, provision for a 2 form entry primary school including provision for special education needs and early year facilities, open space and new station car park. It is considered too early to scope out the allocations in the emerging Local Plan. This would also feed into any in combination effects. Subject to comments from WSCC, this may have to include regard to the provision of a new secondary school within Billingshurst in light of the current capacity and the impacts from the cumulative housing numbers.</p> <p>e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.</p> <p>This should include</p> <p>EIA/26/0003: hybrid planning permission (the 'Application') for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure (the 'Proposed Development') Newbridge Park, Land West of Billingshurst Environmental Impact Assessment (EIA) Scoping Report January 2026</p>	<p>Significant and/or residual environmental impacts anticipated</p>
<p>h) the possibility of effectively reducing the impact</p>	<p>Various studies and statements to ensure the provision of appropriate mitigation. Examples beyond those already identified include;</p> <ul style="list-style-type: none"> • Good construction and management practices to ensure waste is minimised as far as possible • Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. This should be a mitigation measure. • CEMP to include dust and emissions controls as well as monitoring, reporting and compliance. • Air Quality Assessment (AQA) regardless of the anticipated Air Quality impact. The AQA should be included in 	

the EIA and should cover: Description of the development & planning context; Baseline air quality review; Construction phase assessment; Traffic impact assessment; Identification of sensitive receptors; Dispersion modelling; Damage cost calculations; Mitigation strategy. Please refer to the DEFRA Air quality appraisal: damage cost guidance, the Sussex Air guidance and IAQM guidance for help with this. Additionally, all developments that require an AQA, need to provide evidence that they have minimised PM2.5 emissions, and provided appropriate mitigation, in line with the DEFRA PM2.5 Interim Guidance.

- Odour assessment in relation to the IAQM guidance. As receptor sensitivity is likely to be high in the area close to the WwTW, a maximum Odour Exposure Level of 1.5 ouE/m³ is likely to be more applicable.
- Heritage Assessment to take the form of a comprehensive desk-based assessment of the site which should be informed by a HER Search geophysical survey of the development area.
- Environmental constraints data (Flooding from surface water and all known watercourses) sets used to feed into drainage strategy. It is suggested the proposed masterplan is overlaid with the Flood Zones and Surface Water Flood Risk mapping, to demonstrate how the sequential approach has been used. It is highlighted there are requirements for a sequential approach to site design, particularly as this site is affected by both EA modelled flood zones and areas of modelled surface water flood risk. It would be expected the applicant to fully assess the risk of flooding from rivers both in the present day and with climate change as per the latest climate change allowances guidance. The applicant would be expected to fully mitigate against the design flood event including climate change. Any works within 8 metres of a Main River will require a Flood Risk Activity Permit through the Environment Agency. In detailing mitigation of likely effects, it needs to be demonstrated in site investigations or infiltration testing to demonstrate why this is an appropriate approach, to ensure the application follows the SuDS Hierarchy and the National Standards for SuDS (NSfS).
- How adverse impacts on BMV agricultural land can be minimised through site design/masterplan. How any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain
- A Habitat Regulations Appropriate Assessment will be required on this proposal. Provide a shadow HRA to accompany the application.
- Increased expenditure of the public purse to address increased recreational user pressure on PRow network the relationship of the proposed new development to the economy (viability and vitality) of the Billingham Village Centre in terms of access by its additional residents and the associated local retail/services that could be built in. good lighting practice in accordance with the recommendations of the Institute of Lighting Professionals (ILP) and Society for Light and Lighting (CIBSE) as well as the Bat Conservation Trust should be referenced.
- Landscape and Visual Impacts would arise that should be subject to an LVIA. This LVIA should include an assessment of the site's potential to fall within the setting of the SDNP. It is advised inclusion of the following documents as part of the evidence base:
 - o View Characterisation Study
 - o People & Nature Network (GI Strategy)
 - o South Downs Management Plan (2026)
 - o South Downs Landscape Character Assessment
 - o Historic map evidence and HLC Considerations relating to the setting will not be limited to visual impacts, but

	<p>these will form an important aspect. When the LVIA is submitted to accompany an application, it will be important to also assess the impact on distant views towards the SDNP from roads and rights of way through and around the site.</p> <ul style="list-style-type: none"> • Demonstrated how the proposal would comply with Policy M9 via a Mineral Resource Assessment (mitigation). • Lighting Impact Assessment will be produced and that there will be measures in place to control light spillage and zero ULR. However, at the moment it is indicated that the site would fall within the E3 Environmental Zone, whereas E2 may be more applicable given the proximity to the IDSR. 	
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Results of any relevant EU environmental assessment that is reasonably available	None applicable	
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Conclusion

EIA Required?	Yes
Statement of reasons	<p>The threshold for site area is exceeded in Schedule 2 of the EIA regs. (2017).</p> <p>This Screening Opinion has identified several technical topics with likely Significant effects. These are not adequately addressed by mitigation in evidence provided in the submitted screening material. These are as follows:</p> <p>Odour; Transport and Accessibility; Biodiversity; Water Resources; Landscape and Views; and Socio-Economics</p> <p>The likely effects of the Proposed Development regarding these technical topics are considered Significant alone and in combination with existing and approved development.</p> <p>Based on the information submitted, the screening assessment of the current pre-application proposal has identified need for mitigation measures to address impacts on the environment but in incorporation of these within the design principles of the proposed development is not satisfactorily demonstrated.</p> <p>Cumulative effects: It is noted that an EIA Scoping Opinion was submitted on 2nd February 2025 for a residential-development for up to 1,100 dwellings, a primary school, care provision, a community centre, retail space, sports facilities, public open spaces and associated infrastructure at Newbridge Park, Land West of Billingshurst (EIA/26/0003). This is located to the north of the site. In the event of both these proposals coming forward, these may generate cumulative effects</p>

	<p>of a scale or nature that would constitute potential significant environmental impacts.</p> <p>It has therefore been demonstrated that in this case, an EIA is required, albeit one of limited scope.</p>
Date	Matthew Porter 02-04-2026