

Horsham District Council Screening Assessment

Applicant Reference: EIA/22/0001

Development Proposal: Erection of 300 dwellings along with access, landscaping, formal and informal open space at Lower Broadbridge Farm, Broadbridge Heath Horsham

EIA Regulations	
Is the proposed development listed in Schedule 1?	No
Is the proposed development listed in Schedule 2? (Note 'wide of scope, broad of purpose' legal judgement)	Yes – The proposal exceeds thresholds of Category 10(b) projects in Column 1 of Schedule 2 of the Regulations. The proposal includes: <ul style="list-style-type: none"> • More than 150 dwellings (300 proposed); • The overall area of development exceeds 5 hectares (total development area is 22ha). This means the proposal could constitute Schedule 2 development subject to the selection criteria as identified in Schedule 3 of the Regulations.
Is the proposed development in a sensitive area as defined in Regulation 2? (SSSI, National Park, property on World Heritage List, Scheduled monuments, AONB, SPA or SAC)	No

Schedule 3 – Selection Criteria for Screening Schedule 2 Development

1. Characteristics of Development	Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)	Significance
a) Size of development (e.g. site area, scale)	<p>The proposed development seeks 300 dwellings (including affordable housing) on a developable area of approx. 8.6ha of a total wider site area comprising 22ha of land retained / provided as woodland, formal and informal play space. The average resulting density would be 66 dwellings per hectare.</p> <p>Site would have two separate primary access points from the new junctions off the Five Oaks Road/A281 roundabout to the south to the Guildford Road/A281 roundabout to the north. The development would comprise the following:</p> <ul style="list-style-type: none"> • The creation of new public open space to the north and west of the Site incorporating new footpaths, attenuation basis, species rich wildflower meadows and structural native planting. • Existing tree belts, woodland and areas of priority habitat to be retained and 	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

	<p>reinforced where necessary with buffer areas to be provided to the proposed development areas.</p> <ul style="list-style-type: none"> Proposed formal and informal playspace within the residential parcels, retention of existing public footpaths and provision of new public footpaths to provide connectivity. <p>The site is adjacent to the Built up Area Boundary of Broadbridge Heath but is not within it. The site is not an allocated site within the HDPF or an identified site within the Slinfold Parish Neighbourhood Plan. The site is identified as a smaller scale housing site for approx. 150 dwellings in the Draft Regulation 18 Horsham Local Development Plan as well identifying a 3.7ha parcel of land at Lower Broadbridge Heath Farm suitable for B1, B2 and B8).</p>	
<p>b) accumulation with other existing or approved development</p>	<p>Any cumulative impacts of the proposed development on this site should consider the effects of both construction and operational phases of the development which together may have a greater impact than those considered separately for each development. It is considered that with the implementation of standard best practice mitigation measures significant cumulative effects of potential related and combined impacts are considered to be unlikely during either the construction or operational phases of the development. Supporting evidence will need to be submitted with the development proposals and provide a thorough assessment of the likely impacts and mitigation measures that would be proposed to overcome any potential adverse or appreciable impacts on visual or private amenities.</p> <p>There are no significant developments approved in the locality at this time but not built, other than a modest extra care development to the south of the site at Wellcross Farm. No cumulative effects of significance are identified.</p> <p>A Landscape and Visual Impact Assessment which considers cumulative impact must be with any forthcoming application.</p>	
<p>c) use of natural resources, in particular soil, water and biodiversity (e.g. land, water, materials, energy – non-renewable or in short supply?)</p>	<p>The development will require the use of resources such as land, energy, materials for construction and operational phases of the proposals, along with road surfacing and hard and soft landscaping. The Council can require the applicant to include measures in the CEMP to minimise the consumption of natural resources. The dwellings would be constructed in accordance with standard techniques in line with the most up to date Building Regulations.</p> <p>Horsham District is situated in an area of serious water stress, as identified by the</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate</p>

	<p>Environment Agency Water Stressed Areas Classification.</p> <p>Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone. This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. The Sussex North Water Resource (Supply) Zone also covers Crawley Borough and parts of the Chichester and Arun Districts and the central area of the South Downs National Park.</p> <p>This area is served by groundwater abstraction near Pulborough. This has the potential to impact upon the nearby Arun Valley, a Special Area Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The hydrology (water quantity and its movement) of the area is essential to maintaining the habitat upon which the designation features/species rely on.</p> <p>This Authority has received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the above Arun Valley sites. It advises that development within this zone must not add to this impact.</p> <p>The full interim advice from Natural England is that development proposals that would lead to a material increase in water demand will need to demonstrate 'water neutrality'. This means that there would be no increase in water consumption, demonstrated by a combination of water efficiency, water recycling and offsetting measures. This should be demonstrated in a water budget, showing the baseline and proposed water consumption and mitigation measures proposed. This must be submitted as part of the application.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. Allied to providing water efficiency measures within the development there are therefore known options to potentially offset water usage on and off site. Such options are capable of being developed into a water neutrality strategy sufficient to pass Appropriate Assessment and therefore avoid adverse impacts on the Arun Valley. In the event the strategy is</p>	<p>against any impacts arising from the development.</p> <p>Further details required with application:</p> <p>CEMP Water Neutrality Statement Sustainable Energy Statement Ecological and Biodiversity Surveys</p>
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	<p>insufficient to pass Appropriate Assessment, it would not be possible to reasonably grant permission contrary to the Habitat Regulations. Subject therefore to the submission of a water neutrality strategy to be secured either by condition or legal agreement, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p> <p>The applicant has advised that the site has several features of ecological importance, including foraging and commuting bats and bat roosts, and records of reptiles and Great Crested Newts, Water Vole and breeding Birds within the site and surrounding area. During construction phase there would be some loss of natural resources including trees and other ecological habitats. The applicants advise that the development would result in permanent ecological benefits from the enhancements of degraded ecological habitats and areas of woodland, along with the creation of new ecological habitats.</p> <p>A Preliminary Ecological Survey is required as part of any future application submission. Proposals must address measures to avoid compensate and mitigate for biodiversity losses and should provide appropriate biodiversity net gain.</p> <p>A Sustainability/ Energy Statement is required as part as any future planning application setting out how the development will be in accordance with the energy hierarchy. The level of resources used will depend on the energy and sustainable construction standards for the proposed use.</p> <p>Measures within a CEMP to minimise the consumption of natural resources are required as part of the application.</p>	
<p>d) the production of waste (demolition, construction, operation and decommissioning?)</p>	<p>In accordance with best practice measures, a CEMP should be prepared, which will include details of the types of waste stream that will likely be generated on-site during demolition and construction, along with the relevant recycling/ disposal route. Waste minimisation strategies incorporated in the design and the procurement strategy, and information on how waste will be managed during the construction works (e.g. the employment of the waste hierarchy strategy, to minimise the volume of waste produced and to divert waste from landfill as far as possible) will also be outlined within the CEMP. It is anticipated that waste during the operational stage of the Proposed Development will managed by a registered waste contractor.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

		<p>Further details required with application:</p> <p>Site Waste Management Plan may be required</p>
<p>e) pollution and nuisances (e.g. potential for noise, dust, vibration, light, odours, production of substances / emissions which may damage environment -construction, operation and decommissioning)</p>	<p>Contamination risks arising from the existing use of the site would be linked by the existing stone business; localised spills and leaks from farm machinery; use of agrochemicals such as fertilisers; pesticides and herbicides; organic rich near surface soils; and any made ground associated with unknown contamination infilling.</p> <p>There is a High Pressure Gas Main that runs north to south adjacent to the western boundary and cutting across the southern field parcel across the A234 through the existing Broadbridge Heath residential area. The applicants advise that they have been in consultation with the Health and Safety Executive during development of the proposals.</p> <p>During demolition and construction phase there is potential for some noise, dust and vibration from both the construction of residential development on the site as well as from traffic, any impact will be local to the site area and its immediately locality. The nearest noise receptors are identified as being residential dwellings within the surrounding area, and principally the adjacent properties. Impacts of noise could potentially be managed via imposition of appropriate conditions should it be considered necessary.</p> <p>Any impact during construction will be short-term and temporary and can be mitigated through adherence to a Construction Management Plan providing for noise and dust suppression measures (the submission, approval and implementation of which can be secured by a planning condition), to ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers.</p> <p>Any new residential development would lead to some level of road traffic generation and may need to be considered against criteria set out in the Institute of Environmental Management and Assessments' (IEMA) 'Guidelines for the Environmental Assessment of Road Traffic'.</p> <p>Construction works are likely to generate a higher number of HGV's accessing the</p>	<p>No significance and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application</p> <p>Transport Assessment Environmental Risk Assessments Phase 1 (desktop study) Phase 2 (Intrusive Investigation) contaminated land reports Construction Management Plan Air and dust pollution Assessment Noise and Vibration Assessment Flood Risk Assessment Drainage Strategy Lighting Assessment and Strategy</p>

site from the surrounding network of roads during the delivery and removal of import materials. Details of measures to deal with dust generated through construction should be managed in accordance with best practice measures and as required within a CEMP. A Transport Assessment and Travel Management Plan should address the effects of Highway networks and any requirements for mitigation. The effects on private and visual amenities within the locality are considered to be temporary and significant environmental effects are not considered to be likely.

Appropriate measures, in accordance with all relevant legislation, should be used to prevent accidental spillages of contaminants during the construction and use of the highways improvements once completed.

There would also be emissions resulting in air quality considerations that are associated with the operational phase of the proposed development. As the development is residential in nature, emissions would mainly be associated with the number of vehicles travelling to and from the site as a result of the future residents that will occupy the 300 dwellings on the site. The site is not located within an Air Quality Management Area.

Pollution is likely to arise from the operational development and travel to and from dwellings by motor vehicles. The site has access to local facilities, bus routes etc with connections via existing and proposed pedestrian footways. EVCP should be incorporated into any proposals for development.

Consideration of distances between dwellings, orientation and design should address issues in regards to potential overlooking and loss of private amenity.

A lighting assessment should form part of the application submissions. A Lighting Impact Assessment is required as part of the planning application.

The site is located entirely within Flood Zone 1; meaning there is a low probability of river flooding. It is however located immediately adjacent to areas of land to the immediate north and west of the site boundaries, and is identified as being within Flood Zone 2 and 3. The effects in relation to surface water and hydrology are expected to be assessed in full in supporting material submitted with the planning application (including a Surface Water Drainage Strategy, Foul Drainage Scheme, and Flood Risk Assessment (FRA)). With a suitable drainage strategy and SuDS features (including water attenuation facilities) the resultant effects can be managed appropriately, and are unlikely to be significant.

<p>f) the risk of major accidents and/or disasters (including those caused by climate change)</p>	<p>It is not considered that the site is within an area where natural disasters are likely to occur including those arising from climate change. However, the proposed development which is within Flood Zone 1 (low risk area) and adjacent to Flood Zone 2 and 3 (greater risk areas), would increase the level of impermeable areas on the site which without mitigation measures would result in an increase of surface water flooding. The scheme should adopt sustainable drainage techniques to mitigate against such concerns. A Drainage Strategy should be submitted with any future planning application.</p> <p>During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. The proposed development should be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of and the site to major accidents / or disasters.</p> <p>During the construction phase, certain materials may be present on the site which may be harmful to the environment. The effects in relation to hazardous substances and contamination are assessed by way of supporting material submitted with the planning application and conditions imposed in the event of planning being permitted. An Environmental Risk Assessment is required as part of any future application to be submitted. All such measures would form part of the CEMP. Any associated risks to human health arising from the proposal should be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further details required with application:</p> <p>Drainage Strategy Environmental Risk Assessments Phase 1 (desktop study) Phase 2 (Intrusive Investigation) contaminated land reports CEMP</p>
<p>g) The risks to human health (e.g. due to water contamination or air pollution)</p>	<p>Appropriate measures, in accordance with all relevant legislation, should 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 should 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 should be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible.</p> <p>Southern Gas Network (SGN) records show a high pressure gas pipeline crossing</p>	<p>Flood Risk Assessment Drainage Strategy Transport Assessment CEMP</p>

	through the centre of the site from north west to south east west. The proposed development should be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of and the site to major accidents / or disasters.	
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2. Location of Development: the environmental sensitivity of geographical areas likely to be affected by development must be considered having regard, in particular to	Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)	Significance
a) the existing land use	<p>The site (22ha) largely comprises 6 medium to large arable fields and is defined as agricultural land surrounded by belts of trees.</p> <p>Lower Broadbridge Farm (Grade II listed) is located on the sites eastern boundary, adjacent to the A281. There are former modern farm complex buildings and associated hardstanding areas (in existing use for distribution processing and storage of stone) to the north of the farmhouse, The northern and eastern boundaries of the site comprise well established boundary vegetation beyond which lies countryside.</p>	<p>No significance and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p> <p>Further information required with application:</p> <p>Preliminary Ecological Appraisal (PEA) Landscape and Visual Appraisal</p>
b) the relative abundance, quality and regenerative capacity of natural resources in the area (common land use? Quality of land / designations / protected species – would development lead to irreversible loss of key	The site is agricultural land (mix of Grades 3 and 4 classification - Natural England Regional Agricultural Land Classification Maps). The nature of the development would have a long term impact as a result of the permanent and irreversible loss of land associated with the existing arable land. A Preliminary Ecological Survey is necessary and should form part of the planning application	No significance and/or residual environmental impacts anticipated in EIA terms

<p>qualities or resources in the area?)</p>	<p>considerations.</p> <p>The site is identified as being located on Brick Clay (Weald Formation) and also Building Stone (Including the access and processing area) at Theale Farm. Building Stone is a minerals resource which is safeguarded, the site falls within the Brick Clay Resource Consultation Area and Building Stone Resource Consultation Area. All Minerals Safeguarded Area's include a 250m buffer to protect the resources from inappropriate development. Thresholds apply to non-mineral development. The site is also identified as being within a Minerals Infrastructure Consultation Area. The West Sussex Joint Minerals Local Plan, West Sussex Waste Local Plan, Minerals and Waste Safeguarding Guidance March 2020 provides guidance on how the safeguarding of minerals resources and infrastructure associated minerals supply will take place in West Sussex. Policies M9 (Safeguarding Mineral Resources) and M10 (Safeguarding Minerals Infrastructure) are relevant. A Minerals Resource Assessment (MRA) is required as part of any future planning application to determine whether the proposal will lead to mineral sterilisation and applicants are encouraged to identify and address any safeguarding issues.</p>	<p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p> <p>Further information required with application:</p> <p>Preliminary Ecological Appraisal (PEA)</p> <p>Minerals Resource Assessment</p>
<p>c) the absorption capacity of the natural environment, paying particular attention to</p>		
<p>i) wetlands (e.g. floodplains, impacts on drainage, aquifers)</p>	<p>The Environment Agency's Flood Map for Planning indicates that the majority of the Site is Flood Zone 1 which indicates a low probability (less than 0.1%) of flooding but immediately adjacent to Flood Zones 2 (0.1% 1% - 1:1000 risk of flooding from rivers or sea) and Flood Zone 3 (1% 1:100 risk of flooding from rivers or 0.5% 1:200 risk from sea). There would be an increase in hard standing areas arising from the road and pedestrian networks and parking areas required to facilitate the development.</p> <p>If an EIA is not required any subsequent planning application should include a surface water drainage strategy and a site specific FRA to ensure that any negative impacts are reduced.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
<p>ii) coastal zones (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</p>	<p>There are no identified TPO trees, veteran trees, or ancient woodland within or adjacent to the site boundaries.</p>	<p>No significant and/or residual environmental</p>

<p>of ancient woodland / TPOs).</p>		<p>impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p>
<p>iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)</p>	<p>There are no designated nature reserves or parks adjoining the site and the site is not located within an environmentally sensitive area as defined by the EIA Regulations.</p> <p>The site falls within part of an area identified as a Possible Special Area of Conservation (England) in the online Magic.defra.gov.uk /MagicMap reference maps</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development:</p> <p>Further information required with application:</p> <p>Lighting Assessment and Strategy Landscape and Visual Appraisal</p>
<p>v) areas classified or protected under Member States' legislation; areas designated by Member states pursuant to Directive 79/409/EEC (conservation of wild birds) and Directive 92/43/EEC (conservation of habitats and fauna) (In particular the Arun Valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European</p>	<p>The nearest statutory designated area is Slinfold Stream and Quarry (SSSI) approx 1.4km 1.7km to the west of the application site. Warnham Local nature Reserve is located 2.3km to the north east of the site and is designated for its habitat importance and protected species including bats.</p> <p>The application site is located within the Sustenance Zone but lies outside of the Mens SAC (12,000m) The site is located within an identified Bat Sustenance Zone designated for its populations of <i>Pipistrellus pygmaeus</i>;</p>	<p>No significant and/or residual environmental impacts anticipated in EIA</p> <p>Imposition of appropriate conditions may be required to control and</p>

<p>protected species present that could be affected?)</p>	<p>Soprano pipistrelle bat species.</p> <p>There are three ponds identified within the site, records suggest that there is evidence of amphibians around the site including Great Crested Newt, Smooth Newt and Palmate Newt. Further works is being undertaken by the applicants to assess whether Great Crested Newts are present on or around the site. It is advised that further studies are being undertaken to establish whether there are other reptiles and species present on site.</p> <p>Key habitat features are advised to be retained within the site layout along with a sensitive lighting scheme. Details should be submitted as part of the planning application.</p> <p>The water supply for Horsham District, some of Chichester District and most of Crawley Borough (excluding Gatwick Airport) come from water abstraction at Hardham pumping station, located to the west of Henfield. The Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region. This is covered in more detail within this screening report.</p>	<p>mitigate against any impacts arising from the development:</p> <p>Further information required with application terms</p> <p>Lighting Assessment and Strategy.</p> <p>Preliminary Ecological Assessment and Mitigation Measures Water Neutrality Statement</p>
<p>vi) areas in which the environmental quality standards laid down in Community legislation have already been exceeded (any areas already subject to pollution or damage – include impact on any AQMAs).</p>	<p>There are no areas of the site where quality standards such as AQMA's have been exceeded.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p>
<p>vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment etc)</p>	<p>The proposal would generate employment within the construction industry and would boost the local economy. However the impact is unlikely to be significant.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms.</p>
<p>viii) landscapes of historical, cultural or archaeological significance</p>	<p>The site is not designated as being of particular landscape importance in that it is not designated AONB or National Park.</p> <p>There are no identified listed buildings within the site, however, there are Grade II listed dwellings in the wider area including Lower Broadbridge Farm (Grade II listed) is located on the sites eastern boundary, adjacent to the A281, and Mill House and Mill Cottage on the western site of the site but outside of the red line</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms.</p> <p>Imposition of appropriate conditions may be</p>

	<p>boundary. Field Place (Grade I listed) is located approx. 404m to the north east of the site. The site is separated by field boundary hedges and trees and as such views are partly shielded notwithstanding this a Landscape and Visual Impact Assessments and a Zone of Theoretical Visibility Assessment (ZTV) is required as part of any future application to assess sensitive views from any nearby PROW's.</p> <p>Visual impacts arising will require mitigation and measures should be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. Supporting details are required as part of the planning application. There are no scheduled monuments within or close to the red line boundaries of the site.</p> <p>The site is not within, but is immediately adjacent to the northern boundary of a Site of Archaeological importance (ARCHEO3628) which encompasses the area surrounding the Grade II listed Mill Cottage.</p> <p>The West Sussex Historic Environmental Record (WSHER) identifies the historic landscape character of the area to be post medieval to modern fieldscapes and modern field amalgamation. (report Ref: 4575)</p>	<p>required to control and mitigate against any impacts arising from the development.</p> <p>Further information required with application:</p> <p>Planting Plan Heritage Statement Visual Impact Assessment and a Zone of Theoretical Visibility Assessment (ZTV) Archaeology Report</p>
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3. Characteristics of the potential impact: The potential significant effects of development must be considered in relation to criteria set out under 1 & 2, having particular regard to:	Description	Significance
<p>a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)</p>	<p>Residents adjacent to the site will be affected by the development during the construction phase. Adverse effects would be mostly temporary and minimised through the implementation of a CEMP.</p> <p>The proposed development is in a location and of a height that would not affect aviation – either during demolition, construction (e.g. cranes), or operation. It is noted that Slinfold Aerodrome is located to the south of the river beyond Wellcross Farm and as such the potential impact of any development on the aerodrome should be addressed, including on its emergency landing provisions.</p> <p>The Proposed Development is expected to comprise residential dwellings of a</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development.</p>

	<p>scale similar to the existing buildings, and as such would not impact operations of any surrounding airports or aerodromes. Therefore, it is considered unlikely that the proposed development will result in any significant effects on aviation during construction or operation. However, any potential impacts of development on surrounding airports / aerodromes should be addressed.</p> <p>The Arun Valley is located to the south west of south west of Slinfold (in HDC but within the SDNP) is designated as being of international importance for nature conservation. (It is a Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site as well as the national designation as a Site of Special Scientific Interest (SSSI).</p> <p>The water supply for Horsham District, some of Chichester District and most of Crawley Borough (excluding Gatwick Airport) come from water abstraction at Hardham pumping station, located to the west of Henfield. The Gatwick Sub regional Water Cycle Study concluded that water neutrality is required for Sussex North to enable sufficient water to be available to the region.</p> <p>Natural England are concerned that development which takes place in advance of the emerging Local Plan will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that HDC should not issue any new planning decisions until Natural England have produced a mitigation strategy.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
b) the nature of the impact	<p>The main impacts are on the landscape (given the rural nature of the site), ecology and biodiversity, and archaeology, as well as potential impacts from lighting, noise and traffic generation (construction and operational development) and possible impacts to heritage assets. In terms of visual amenity, there are currently locations where the likely visual impact can be assessed. Possible negative biodiversity impacts arising given the potential for bats given the site</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate</p>

	<p>lies partly within an identified Bat Sustenance Zone. Some positive biodiversity impacts and landscape enhancements may arise as a result of the proposed development.</p> <p>The Proposed Development has the potential to impact on local air quality during both construction and operation. During construction this would be due to the potential impacts of dust soiling, road traffic emissions from construction traffic and once operational through road emissions and day to day operation of the Proposed Development.</p> <p>An air quality assessment should be submitted in support of the planning application, which will provide details of mitigation measures, if required.</p> <p>The development has the potential to lead to permanent impacts on landscape Significant character, landscape, water resources affecting the Arun Valley SAC, SPA and Ramsar sites, and visual amenity, both to the locality and its immediate and wider setting within the National Park landscape.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	<p>conditions may be required to control and mitigate against any impacts arising from the development Further information required with application:</p> <p>Preliminary Ecological Appraisal (PEA) Landscape and Visual Impact Assessment; ZTV assessments; Air & Dust Pollution Assessment.</p>
c) the transfrontier nature of the impact (any international impacts?)	None identified	No significant and/or residual environmental impacts anticipated in EIA terms
d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)	Natural England are concerned that development which takes place in advance of the emerging Local Plan will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that HDC should not issue any new planning decisions until Natural England have produced a mitigation strategy.	No significant and/or residual environmental impacts anticipated in EIA terms Imposition of appropriate

	<p>Significant environmental impacts anticipated In the case of the size and nature of the development proposal (the additional housing quantum and new allotments) will have an increase in water consumption, and so require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality can be achieved by developers building significant water efficiency measures into new development and by providing offsetting measures to reduce water consumption from existing development, so the development becomes water neutral. The statement will need to calculate the water balance and we will be providing some further guidance on what should be included in a water neutrality statement. It is not just a case of providing water efficiencies measures onsite as this will not make the development water neutral</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p> <p>The impact of the development arises from the potential for 300 new dwellings on the site would most likely be felt by the immediate neighbours, surrounding development and occupiers. However given the close proximity of the adjacent settlement and Built up Area Boundary, the effects of the potential development are likely to be experienced within this residential context and as such would not be considered unusual, subject to a thorough assessment of all relevant supporting information. It is considered that the scale and location of the development may result in landscape visual impact and impact on protected species within the surrounding habitats. Supporting information is required to ascertain the significance of this impact, however it is anticipated this could be managed through usual application process and the provision of appropriate mitigation and conditions.</p> <p>There is also likely to be some impact in terms of additional traffic generation. Further details regarding the anticipated traffic movements and numbers to and from the site each day / week will be considered as part of the application process in order to assess the impact of the proposed development.</p>	<p>conditions may be required to control and mitigate against any impacts arising from the development:</p> <p>Further information required with application:</p> <p>Planting Strategy / Plan Water Neutrality Statement</p>
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	<p>Impacts on landscape could be managed through the provision of appropriate mitigation.</p>	
<p>e) the probability of the impact (e.g. overall probability of impacts identified above)</p>	<p>Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone As it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site, we advise that developments within this zone must not add to this impact. This is required Significant environmental impacts anticipated by recent caselaw, Case C-323/17 People over wind and Sweetman. Ruling of CJEU (often referred to as sweetman II) and Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu Case C-293/17 (often referred to as the Dutch Nitrogen cases).</p> <p>Between them these cases require Plans and Projects affecting sites where an existing adverse effect is known (i.e. the site is failing its conservation objectives), to demonstrate certainty that they will not contribute further to the existing adverse effect or go through to the latter stages of the Regulations (no alternatives IROPI etc).</p> <p>The probability of impacts highlighted are considered to be permanent and long-lasting given the scale and nature of the development.</p> <p>The site is identified as generally at low risk of flooding from all other sources (although its proximity to Flood Zone 2 and 3 is noted). Some residual risk exists in the form of surface and groundwater flooding. However mitigation measures exist to manage this. This can be carefully designed in co-ordination with landscape constraints in order to minimise the amount of material that will need to be removed from site by aiming to achieve a cut/fill balance, and incorporating sustainable drainage features which will provide treatment to runoff.</p> <p>The probability of the above impacts identified above is high (i.e. impact on landscape character etc), and the anticipated effects of the proposed development can be clearly established with reasonable confidence. Mitigation measures at planning application stage can be used to appropriately manage impacts arising from the development (plus any cumulative impact that may arise).</p> <p>The traffic impacts of the Proposed Development will be need to be carefully managed, to limit the impact of the vehicles on the surrounding transport</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p> <p>Further information required with application:</p> <p>Water Neutrality Statement Planting Plan Noise and vibration Assessment. Flood Risk Assessment Drainage Strategy Transport Assessment / Statement CEMP Preliminary Ecological Statement Landscape and Visual Impact Assessment ZTV assessments</p>

	<p>network so that any impacts and resultant effects upon receptors that do occur are not significant. This could include routing movements during off-peak travel hours and a just-in-time delivery system on site to avoid the potential for off-site queuing.</p> <p>Other impacts such as impacts on protected species or the level of traffic increase are less certain and some may be managed through appropriate controls exercised through the imposition of conditions as required.</p> <p>Some degree of landscape impacts are likely to arise from the proposed development however, such potential impacts and their probability would likely be mitigated through appropriate planning conditions and obligations.</p>	
<p>f) the duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)</p>	<p>Construction effects would be temporary and short term in duration, and the operational effects would be permanent and long term. Development is likely to commence following planning approval and the discharge of any pre-commencement conditions attached to the planning permission (within 3 years of the permission). Construction impacts would be intermittent and reversible. Operation impacts would be continuous and irreversible.</p> <p>This includes water usage impact on the Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Significant environmental impacts anticipated Zone. Developments within Sussex North must not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.</p>	<p>No significant and/or residual environmental impacts anticipated in EIA terms</p> <p>Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, however at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed.</p> <p>Further information required with application:</p> <p>CEMP Noise and vibration Assessment</p>
<p>g) the accumulation of the impact with the impact of other existing and/or approved</p>	<p>The construction phase would result in temporary construction impacts that could be managed through a CEMP. The operational development is unlikely to</p>	<p>No significant and/or residual environmental</p>

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

	<p>achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.</p> <p>Where an increase in water consumption is likely (including reserved matters), the Council will require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality can be achieved by developers building significant water efficiency measures into new development and by providing offsetting measures to reduce water consumption from existing development, so the development becomes water neutral. The statement will need to calculate the water balance and we will be providing some further guidance on what should be included in a water neutrality statement. It is not just a case of providing water efficiencies measures onsite as this will not make the development water neutral.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	<p>Construction Management Plan Ecology Statement Water Neutrality Statement</p>
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Results of any relevant EU environmental assessment that is reasonably available	None applicable	
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Conclusion

EIA Required?	No
Statement of reasons	The Proposed Development is not a Schedule 1 development, and it is not located in a sensitive area. Whilst the threshold for site area is exceeded in Schedule 2 of the EIA regs. (2017) the effects of development are considered not to be significant in combination with existing and approved development. There would be some impact on natural resources including biodiversity, and the production of waste and pollution during the construction phases however these are considered to not be significant in relation to the types and characteristics of the potential impact.

	<p>There is likely to be some negative landscape and traffic impacts arising from the impact of the development on the countryside surrounding the development site arising from the introduction of new dwellings on this unallocated site. Whilst it is noted that part of the site was identified as a potential smaller housing development site within the Reg 18 Horsham Local Development Plan, this has no bearing on the assessment of this EIA appraisal. Therefore, notwithstanding this, it is considered that with appropriate mitigation secured through planning conditions and a legal agreement where necessary, these impacts are considered to not be significant. In addition, it is acknowledged that an additional 300 dwellings on this site, in combination with the surrounding cumulative development, is likely to result in an increase in vehicles and vehicle movements.</p> <p>The traffic impacts of the Proposed Development will be need to be carefully managed, to limit the impact of the vehicles on the surrounding transport network so that any impacts and resultant effects upon receptors that do occur are not significant. This could include routing movements during off-peak travel hours and a just-in-time delivery system on site to avoid the potential for off-site queuing.</p> <p>Noise arising from the Proposed Development during its operation has the potential to result in adverse effects to existing noise sensitive receptors. Noise will need to be assessed according to the relevant standard (which is British Standard BS4142) and mitigation measures (such as screening or restrictions on certain activities at particular times) may be used to ensure that noise levels at nearby noise sensitive receptors either do not result in any adverse effects or are mitigated and minimised so far as is reasonable, in accordance with Planning and Noise Policy requirements. Details of the assessment, including baseline survey data, predicted levels and mitigation measures would be provided within a noise impact assessment submitted with the planning application.</p> <p>There may be some impact on other areas such as ecology, minerals, archaeology and heritage however these can be suitably mitigated and would not likely be significant, however further information is required in terms of these aspects to fully appreciate the impact of the proposed development, but this is not considered to be significant enough to trigger an EIA.</p> <p>The screening assessment for this proposal has identified that the vast majority of impacts on the environment could be similarly addressed with mitigation measures incorporated within the design of the proposed development, and that significant effects are not considered likely, either alone or in combination with other development. The proposals would be of a sufficiently manageable scale that effects could be managed in accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations. It is therefore considered that, whilst the development is Schedule 2 development, it has been demonstrated that the proposed development will be unlikely to cause significant environment effects, and in this case, EIA is not required.</p>
Date	AW – 02/03/2022

