

Horsham District Council Screening Assessment

HDC Reference - DC/21/2086

Applicant Reference:

Development Proposal: Development of up to 78 dwelling houses, community parkland, allotments and associated development.

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 (overall area of development exceeds 5 hectares as per Category 10(b)(i))
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)	Yes. South Downs National Park

Schedule 3 – Selection Criteria for Screening Schedule 2 Development

1. Characteristics of Development	Description (include permanent / temporary impacts, positive and / or negative impacts / likelihood of impact as applicable)	Significance (direct and indirect)
a) Size and design of development (e.g. site area, scale)	<p>The site consists primarily of a roughly rectangular shaped parcel of land that covers an area of 11.56 hectares. The site consists primarily of existing allotments and former agricultural fields now reverted to open scrub land. The site is located to the south of Storrington and falls with South Downs National Park and Horsham District Council.</p> <p>The northern part of the site within Horsham District is allocated under Policy 2ii – Ravenscroft Allotment site of the Storrington, Sullington and Washington Neighbourhood Plan for at least 35 dwellings, relocated allotments and a landscape buffer along the southern boundary. The remainder of the site (approximately 9.3ha) falls within the National Park, and comprises a mainly open area of scrub with partial mature tree belts along old field boundaries.</p> <p>The site has direct access into Storrington via Ravenscroft and Brown's Lane. The development would include the provision of allotments and construction of landscaping, drainage and associated works. The development is residential in nature.</p> <p>The proposal is for up to 78 dwelling houses, community parkland, allotments and associated development.</p>	No significant and/or residual environmental impacts anticipated

<p>b) cumulation with other existing or approved development</p>	<p>The current draft of the Local Plan Review (Reg. 18) proposes no other allocated sites. The made Storrington Sullington Washington Neighbourhood Plan allocates other sites within the vicinity of Storrington including at least 15 dwellings at land at Old London Road (The Vineyard) Washington, a minimum of 6 dwellings at land at Angell Sandpit, Storrington (the subject of planning permission DC/21/0057), residential development at land at Old Mill Drive (The Diamond) Storrington and land north of Downsview Avenue for at least 60 dwellings (the subject of approved outline permission DC/19/2015).</p> <p>Although there is no other recent development in the SDNP part of the site, it was not included in the original allocation, which seeks to allocate at least 35 dwellings within the settlement boundary of Storrington. Whilst the part of the site within the SDNP is not proposed for housing development, it is proposed as a 'community parkland' to include allotments, open space, a community park and habitat area to support up to 78 dwellings in the northern part of the site.</p> <p>Elements such as cumulative highway effects can be assessed as part of the Transport Assessment, submitted alongside a future planning application. The scheme is likely to require its own mitigation measures to address any adverse effects.</p>	<p>No significant and/or residual environmental impacts anticipated</p>
<p>c) the use of natural resources, in particular soil, water and biodiversity (e.g. land, water, materials, energy – non renewable or in short supply?)</p>	<p>The construction of the development will use resources in terms of land, water and energy as would be expected for a residential development. The operation phase of the development is anticipated to use water resources.</p> <p>The proposed use of materials is consistent with new building projects. The level of efficiency of the homes is yet to be established through reserved matters applications and detailed design, however the buildings will be required to meet Horsham Local Plans policy requirements on new buildings and building control standards, likely to be secured through planning conditions.</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>No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

The site is in a Soft Sand Mineral Safeguarding Area under the West Sussex Minerals Plan. The area of the proposal site, which would be built with residential development on is already allocated for housing in the Storrington, Sullington and Washington Neighbourhood Plan.

Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone. This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site. The Sussex North Water Resource (Supply) Zone also covers Crawley Borough and parts of the Chichester and Arun Districts and the central area of the South Downs National Park.

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

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

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

Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. Allied to providing water efficiency measures within the development there are therefore

	<p>known options to potentially offset water usage on and off site. Such options are capable of being developed into a water neutrality strategy sufficient to pass Appropriate Assessment and therefore avoid adverse impacts on the Arun Valley. In the event the strategy is insufficient to pass Appropriate Assessment, it would not be possible to reasonably grant permission contrary to the Habitat Regulations. Subject therefore to the submission of a water neutrality strategy to be secured either by condition or legal agreement, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
<p>d) the production of waste (demolition, construction, operation and decommissioning?)</p>	<p>The proposal site has no significant built development on site. Allotment paraphernalia would not result in solid waste that should warrant concern. Construction waste would be reused and recycled where possible. Significant quantities of construction waste are not anticipated as a result of the development. Waste would be disposed of in line with HDC requirements and managed in accordance with all applicable legislation and in line with best practice. These measures were set out in the previous EIA screening Schedule 3 Assessment and can be secured by planning condition or other environmental control 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>Storrington High Street is designated an Air Quality Management Area, approximately 300 metres from the site. There is some potential for air quality during the construction phase of the development. The operational phase will inherently result in the increase of car provision and that in order to minimise impacts on air quality, this can be controlled through measures encouraged in local and national policy. The completed development is expected to generate 41 two way vehicle movements in the morning peak hour and 38 in the evening peak hour during the occupation phase. It would be expected that these vehicles generated by the development will route along Meadowside. The development proposal will therefore generate circa one additional vehicle movement every 1.5 minutes on Meadowside.</p> <p>A Transport Assessment and an Air Quality Assessment has been provided with the application. Impacts on air quality effects are consistency found with the construction of new housing and can be appropriately managed through Construction Environmental Management Plans, Travel Plans and increased use of sustainable transport and if necessary, contributions sought under the Council's Air quality and emissions mitigation guidance for Sussex (2021). These mitigation measures can be controlled through conditions, and where necessary and appropriate, planning obligations.</p>	<p>No significant and/or residual environmental impacts anticipated</p>

During the construction phase there is potential for effects to arise from building works, in terms of noise and vibration, traffic disturbance and any dust from site preparation/ground works. Any impact will be local to the site area and its immediately locality. Any impact will be short-term and temporary and can be mitigated through adherence to a Construction Management Plan providing for noise and dust suppression measures (the submission, approval and implementation of which can be secured by a planning condition).

The site layout for construction works has the capacity to be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible. Similarly, the air quality effects of road traffic by the proposed development, due to the land use masterplanning, are considered to be not significant for human health receptors. There may be some minor adverse impacts on habitat within the scheme, which will be minimised through sensitive masterplanning.

The proposed use of the land for recreational purposes would introduce a level of noise and disturbance (associated with general comings and goings and recreational activity) to the area. There is some risk of pollution from noise and refuse. Providing the management of noise levels and refuse is secured via condition, it is anticipated that there would be no significant pollution effects from the development.

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

A CEMP, to be agreed with HDC and secured through a suitable planning condition, can ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers. The land uses proposed are not highly contaminative.

The site is located in Flood Zone 1; low probability of river flooding. The site is adjacent to an area of major Ground Water Vulnerability located immediately to the south. A number of surface water features are located close by, including watercourses, ponds, culverts and Chanty Mill and Sullington Warren, both designated as SSSI. There are unnamed ordinary watercourses and drains passing through and adjacent to the proposed development site which

	<p>discharge through a culverted section into the Chantry Mill Pond. The effects in relation to surface water have been assessed in supporting material in a Flood Risk Assessment submitted with the planning application. With the proposed remediation design and implementation of the mitigation measures outlined below, the resultant effects are unlikely not be significant. The scheme avoids any development in the flood plain. In addition, surface water run-off and foul water drainage will be managed on-site during the construction and operational phases.</p> <p>During construction any potential effects to existing properties would be mitigated by measures set out within a CEMP. These would include avoiding works in the floodplain wherever possible, and safe storage of plant or contaminants.</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. All such measures form part of the CEMP. There are no anticipated significant risks of major accidents and/or disasters, including those caused by climate change, during the operation of the development. The development would adhere to highway safety standards.</p> <p>During the construction phase, certain materials may be present on the site which may be harmful to the environment. The effects in relation to hazardous substances and contamination were assessed by way of supporting material submitted with the planning application and conditions can be 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>A land contamination survey has been undertaken which indicates that the only area of concern in regards of land contamination and other existing land uses, is the use of pesticide and DDT and the burning of waste. Methods of mitigation include further sampling, for potential contaminates and soil restoration. The planning application is supported by a desk-based land contamination survey.</p> <p>Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction of</p>	<p>No significant and/or residual environmental impacts anticipated</p>

	<p>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 ensure construction contractors use best practice measures to prevent land and water contamination, as well as effects on construction workers. The site layout for construction works has the capacity to be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible. Similarly, the air quality effects of road traffic by the proposed development, due to the land use masterplanning, are considered to be not significant for human health receptors, subject to appropriate assessment and mitigation. The land uses proposed are not highly contaminative and it is not expected that there is a high risk.</p>	
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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 and approved land use	<p>The site is open shrub land previously in use as agricultural land. The site has potential habitat value. During site clearance of allotment sheds and related structures a relatively small amount of waste will be produced and will be disposed of in a responsible manner consistent with the waste hierarchy and waste management plans, which can be controlled through the use of conditions, imposed by the Local Planning Authority.</p> <p>No additional land or important, high quality or scarce resources will be affected.</p>	<p>No significant and/or residual environmental impacts anticipated</p>
b) the relative abundance, availability, quality and regenerative capacity of natural resources in the area and its underground (common land use? Quality of land / designations / protected species – would development lead to irreversible loss of key qualities or resources in the area?)		
c) the absorption capacity of the natural environment, paying particular attention to		
i) wetlands, riparian areas, river mouths (e.g. floodplains, impacts on drainage, aquifers)	<p>The site is not located on wetlands, riparian areas, river mouth. The site is not located within or close to a groundwater SPZ. Ditches run around the eastern, southern and western boundaries of the site. A Flood Risk Assessment is provided with the application.</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.</p> <p>The Sussex North Water Resource (Supply) Zone also covers Crawley</p>	<p>No significant and/or residual environmental impacts anticipated and mitigated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

	<p>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 site is within 7 km of the Arun Valley SAC / SPA/ Ramsar which exhibits inland water bodies (Standing water, running water) and bogs, marshes and water fringed vegetation, fens. The hydrology (water quantity and its movement) of the area is essential to maintaining the habitat upon which the designation features/species rely on.</p> <p>The definition of water neutrality is that the use of water in the supply area before the development is the same or lower after the development is in place. Therefore, for every new development, water demand should first be minimised then any remaining water demand offset, so that the total water demand on the public water supply in a defined region is the same after development as it was before.</p> <p>An option to consider is that of water offsetting whereby the developer may fund retrofits of existing buildings to achieve a commensurate reduction in water consumption. Based on the measures set out above, significant effects are not considered likely for water neutrality as a result of the Proposed Development coming forward.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p>	
ii) coastal zones and marine environments (any potential for the scheme to impact on coastal areas e.g. runoff etc)	N/A	N/A
iii) mountain and forest areas (impacts on wooded	Small sections of hedgerow are likely to be removed	No significant and/or

<p>areas, including any designated areas of ancient woodland / TPOs).</p>		<p>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>This is a greenfield site, with no historic land uses other than allotments and until recently agriculture. The application site has no formal designated or classification in relation to biodiversity non-classified and would result in the partial loss of greenfield land. There are no statutory designated sites of nature conservation within or adjacent to the site.</p> <p>Adjacent to the north end of the site is traditional orchard priority habitat to northwest of site under active management.</p>	<p>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 valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European protected species present that could be affected?)</p>	<p>The site is within the impact risk zone for Chanty Mill SSSI (355m), Sullington Warren SSSI (851m) and Amberley Mount to Sullington Hill SSSI (1,136 m), and falls within 5 km HRA buffer zone of The Arun Valley Special Protection Area, and the 12 km buffer zone of The Mens SAC.</p> <ul style="list-style-type: none"> - An open amenity space is proposed as part of the scheme including an enhanced ecology habitat, which would divert dog walkers, and those that may disturb ground nesting birds or other species, to this area, particularly for new residents. - The planning application is supported by an Ecology Assessment and appropriate surveying. There is a large great crested newt population to the south. There are known populations of bats, birds and dormice. An Ecological Impact Assessment by The Ecology Co-op, dated November 2020 has been provided and adequately covers ecological issues such that appropriate mitigation measures could be secured by conditions. This include information on Great Crested Newts, and 3 no. ponds located within the site boundary, so the Council can be certain of the impacts of the development. <p>The site is located within a Bat Sustenance Zone as defined by HDC, which extends further to the north and west. The Mens SAC/SSSI comprises mature beech woodland which supports Barbastelle bats (a European Protected Species). The development proposals will retain the majority of existing boundary features but it will result in the loss of foraging and commuting habitat and lighting will be introduced to the residential development. There is evidence to suggest that Barbastelle bats use these are linear foraging and commuting routes within the Impact Risk Zone of the SACs. No external lighting is proposed which would affect the boundary hedgerows</p>	<p>No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

The Council therefore anticipates that, without mitigation, it is not possible to conclude no 'likely significant effect' (LSE) to The Mens SAC in terms of Habitat connectivity and availability for foraging and commuting Barbastelle bats. The Council has therefore undertaken a HRA AA on the impact on Barbastelle bats.

Barbastelle have been recorded commuting along the treelines and hedgerows onsite so the site is considered important for Barbastelle bats at a site level which lies within the bat sustenance zone of a bat SAC designated for this Annex II species.

Having considered the proposed avoidance and mitigation measures set out in the application submitted, Horsham District Council concludes that, the project will avoid an Adverse Effect on the Integrity of The Mens SAC or Ebernoe Common SAC, either alone or in combination with other plan and projects.

Only if the Water Neutrality Appropriate Assessment concludes no adverse effect on integrity can Horsham DC approve this project.

Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone Natural England wrote to HDC as part of the Regulation 18 Local Plan consultation and highlighted concerns about the Arun Valley. They asked that HDC ensure that any new development in the Local Plan is water neutral.

To ensure this is the case, the Local Plan review is supported by two pieces of evidence – the Habitat Regulations Assessment and a separate Water Cycle Study carried out jointly with Crawley Borough Council and Chichester District Council. The Habitat Assessment makes recommendations that the Local Plan can include to contribute to water neutrality. The Water Cycle study is still ongoing.

Habitats Regulations Assessment. In screening for Likely Significant effects on Water quantity, Level and Flow it was concluded that excessive changes to the hydrological integrity, such as through effects on water flow and volume, of European Sites are most likely to be the consequence of increased water abstraction for the public water supply and surface water run-off from impermeable urban surfaces.

The Arun Valley SAC is designated for its population of ram's-horn snails and Natural England's Site Improvement Plan highlights that a maintenance of adequate water levels (0.3cm below ditch neck) is critical to the survival and migration of this species. Furthermore, the Ramsar is designated for its outstanding assemblage of wetland plants and invertebrates, all of which depend on appropriate water levels throughout at least parts of their life cycle. The SAC has a relatively narrow hydrological catchment and its water level is primarily maintained by a few key rivers that traverse the plain.

Natural England have informed Horsham Council that they are very concerned about the Hardham groundwater abstraction (a key part of the Southern Water supply strategy for Horsham during certain conditions) and the effect they consider it has on water levels/flows in the Arun Valley SAC and Ramsar site. Natural England provided interim advice to Southern Water (December 2020) that identified that the existing Hardham abstraction could provide likely significant effects on the Amberley Wild Brooks SSSI part of the Arun Valley internationally designated site. In addition, Natural England could not conclude no adverse effects on the integrity with regards to the Pulborough Brooks SSSI part of the internationally designated site. The interim advice identified that the SAC feature (ramshorn snail) was no longer present at Amberley Wild Brooks and despite conservation efforts was declining at Pulborough Brooks SSSI. A decline in the extent of aquatic plant populations in the North and South (but not Middle) Brooks was also noted. As such, Natural England have advised Horsham that 'The Environment Agency and Natural England are working with Southern Water to try to identify a long term more sustainable water supply. In the meantime, whilst the adverse effect remains or is uncertain, development in Horsham must be certain not to add to this adverse effect'. They then refer the Council to '...studies such as the Gatwick Sub Regional water cycle study regarding this issue. For example, the study cites the requirement to demonstrate water neutrality in order for sufficient water to be available to the district'.

Given this evidence, Likely Significant Effects of the development proposal on the Arun Valley SAC / SPA/ Ramsar regarding water quantity, level and flow cannot be excluded. The site is screened in for Appropriate Assessment. Whilst individual site allocations may not result in likely significant effects in isolation, in combination with each other and other projects and plans they have the potential to result in adverse effects in the integrity of the SPA. This impact pathway cannot be screened out.

This Authority has since received a Position Statement from Natural England. The Natural England position is the Sussex North Water Supply Zone includes supplies from a groundwater abstraction which cannot, with certainty, conclude no adverse effect on the integrity of the Arun Valley Special Area Conservation (SAC), Arun Valley Special Protection Area (SPA), and Arun Valley Ramsar Site.

Natural England are concerned that development which takes place in advance of the emerging Local Plans for Horsham District Council, Crawley Borough Council and Chichester District Council will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that these Councils should not issue any new planning decisions until Natural England have produced a mitigation strategy.

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, Natural England advise that developments within this zone must not add to this impact. This is required 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). 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).

Developments within Sussex North must therefore must not add to this impact. 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.

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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).	Storrington High Street is an Air Quality Management Area and is in the vicinity of the site. Dust generation during the construction phase would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. The site layout has the capacity for construction works will be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible.	No significant and/or residual environmental impacts anticipated
vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment etc)	Currently, the closest built-up area to the site is Storrington. The application site is to the south of Storrington. Storrington has a range of services including primary school, leisure centre, supermarket, doctors surgery and pharmacy and other independent shops. Its population will be affected. The Air Quality Management Area will be impacted. Noise and lighting from the development is likely to arise from plant during the construction phase. However, this would be managed in accordance with the CEMP.	No significant and/or residual environmental impacts anticipated
viii) landscapes of historical, cultural or archaeological significance	<p>The site falls within the Fieldsapes Landscape Characterisation on The Historic Environment Record site. The site is within the archaeological notification area (Storrington Historic Core). Storrington Conservation and Grade II* St Marys Parish Church, Church Street, Grade II St Josephs Dominican Convent and Horsecroft, Greyfriars Lane, Storrington are some 180 metres west of the site. St Josephs Hall, Greyfairs Lane, Storrington is some 290 metres south of the site.</p> <p>There is potential for mitigation of the development on the historic environment would not result in a significant impact but such conclusion would have to be informed by built heritage assessment.</p> <p>The south end of the site is within a National Park. According to the South Downs Integrated Landscape Character Assessment (2011) the site falls within the Arun to Adur Scarp Foothills character area, the surrounding landscape has sensitive natural, cultural and aesthetic / perceptual features which are vulnerable to change.</p> <p>There are three Scheduled Ancient Monuments within this landscape in the locality of the site; Ancient Monument 1015712. Cross dyke on Chantry Hill, 470m south of Grey Friars Farm. This is directly due south of the proposal site, some 1.3 km distant; Ancient Monument 1015714. Cross dyke on Sullington</p>	No significant and/or residual environmental impacts anticipated

	<p>Hill, 500m south east of The Chantry; Ancient Monument 1016407. Group of six bowl barrows 790m south west of Grey Friars Farm: part of a dispersed round barrow cemetery on Kithurst Hill</p> <p>Various non-designated medieval mine pits and prehistoric earthworks – settlement, ritual, roadways along the chalk ridge are identified on the West Sussex Historic Environment Register.</p> <p>The Public Right of Way network is extensive along the chalk ridge, with expansive views northwards.</p>	
<p>3. Types and Characteristics of the potential impact: The potential significant effects of development must be considered in relation to criteria set out under 1 & 2, having particular regard to:</p>	<p>Description</p>	<p>Significance</p>
<p>a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)</p>	<p>The proposed development has the potential to affect the geographical area surrounding the site. Residents adjacent to the site will be affected by the development during the construction phase. Adverse effects would be temporary and minimised through the implementation of a CEMP. It is not considered that people would be significantly affected by the development once operational.</p> <p>The Arun Valley is located to the south of Pulborough (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 south of Pulborough. 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</p>	<p>No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

	<p>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 development has the potential to lead to permanent impacts on landscape character, landscape and water resources and visual amenity, both to the locality and its immediate and wider setting within the National Park landscape.</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>	No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.
c) the transboundary nature of the impact (any international impacts?)	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 south of Pulborough. Natural England has advised that this matter should be resolved in partnership through Local Plans across the affected authorities, where policy and assessment can be agreed and secured to ensure water use is offset for all new developments within Sussex North. To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a	No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal

	<p>water neutrality strategy.</p> <p>The Natural England Position Statement advises it cannot be concluded that the existing abstraction within Sussex North Water Supply Zone is not having an impact on the Arun Valley site. The Arun Valley site is designated a SAC and RAMSAR site under European and International law.</p> <p>Since issuing its Position Statement, this Authority has received subsequent advice from Natural England. Natural England have clarified that they will accept offsetting measures being undertaken on private property provided that property is also served within the Sussex North Supply Zone. As there are known options to offset water usage in the Proposed Development this, in tandem with any strategy to achieve this indicates that water neutrality can be delivered on this site, and with achievable mitigation, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p> <p>The site is partly within the South Downs National Park boundary. Whilst the housing development would be located outside the national park, it would be located adjacent to its boundary. At the time of designation, the line of the boundary of the National Park was carefully considered by the Examiner, and sites that fall on the designated boundary are considered to be of significant value to the landscape designation, and therefore particularly sensitive to development.</p> <p>The use of the land for formalised recreational purposes associated with the housing development, including allotments, could negatively impact the visual appearance, tranquillity and amenity value of this part of the National Park.</p>	<p>agreement.</p>
<p>d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)</p>	<p>Natural England are concerned that development which takes place in advance of the emerging Local Plan will also increase the demand for water abstraction and harm the Arun Valley. They have therefore produced a Position Statement which advises that HDC should not issue any new planning decisions until Natural England have produced a mitigation strategy.</p> <p>Significant environmental impacts anticipated In the case of the size and nature of the development proposal (the additional housing quantum and new allotments) will have an increase in water consumption, and so require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality</p>	<p>No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

	<p>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 demolition / construction works in type and scale would not be likely to cause significant impacts on the part of the site within the SDNP.</p> <p>More permanent impact would derive from the overall activity from the operational use of the site, including the intensity of recreational use, general noise and disturbance. There would also be visual impact from the presence of this scale of development so close to the National Park boundary, and impacts upon dark night skies. This would be significantly more intensive and complex compared to the site's existing use.</p> <p>Landscape quality and visual amenity effects are likely to be the most notable given the National Park designation. However the development is not likely to have complex or significant effects for the purpose of EIA.</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 C323/17 People over wind and Sweetman. Ruling of CJEU (often referred to as sweetman II) and Coöperatie Mobilisation for the Environment and</p>	<p>No significant and/or residual environmental impacts anticipated</p>

	<p>Vereniging Leefmilieu Case C-293/17 (often referred to as the Dutch Nitrogen cases). Between them these cases require Plans and Projects affecting sites where an existing adverse effect is known (i.e. the site is failing its conservation objectives), to demonstrate certainty that they will not contribute further to the existing adverse effect or go through to the latter stages of the Regulations (no alternatives IROPI etc).</p> <p>The probability of impacts highlighted are considered to be permanent and long-lasting given the scale and nature of the development.</p> <p>The site is generally at low risk of flooding from all other sources. Some residual risk exists in the form of surface and groundwater flooding. However mitigation measures exist to manage this.</p> <p>An existing drainage regime of natural infiltration and runoff exists. A connection to this location would be maintained post development with attenuation provided in order to mimic the existing situation with the potential for a modern beneficial impact on more extreme storms.</p> <p>Foul water will be connected to the most appropriate point within the local network, which is adopted by Southern Water who have an obligation to accommodate flows from new developments and provide additional capacity.</p> <p>External levels will be carefully designed in co-ordination with Landscape constraints in order to minimise the amount of material that will need to be removed from site by aiming to achieve a cut/fill balance, and incorporating sustainable drainage features which will provide treatment to runoff.</p>	
<p>f) the expected onset, duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)</p>	<p>Construction effects would be short term in duration and the operational effects would be long term. Development will commence following the discharge of pre-commencement conditions attached to the planning permission. Operational effects would be permanent. Construction effects would be temporary. Construction – intermittent and frequent and reversible.</p> <p>Operation – continuous and irreversible. This includes water usage impact on the Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply 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</p>

<p>g) the cumulation of the impact with the impact of other existing and/or approved development</p>	<p>Elements such as cumulative highway effects of the other allocations of the Neighbourhood plan developments, alongside the proposed dwellings of this proposal, will be assessed as part of the Transport Assessment, which will be submitted alongside a future planning application. This consented scheme has its own required mitigation measures to address any adverse effects.</p> <p>This Authority has received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that development within this zone must not add to this impact. Whilst individual site allocations may not result in likely significant effects in isolation, in combination with each other and other projects and plans that the grant of planning permission in this instance would set the precedent for, they have the potential to result in adverse effects in the integrity of the SAC/SPA/Ramsar sites</p>	<p>No significant and/or residual environmental impacts anticipated</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 studies and statements will be submitted with the planning application to ensure the provision of appropriate mitigation on site. Measures to reduce the impact of the proposals on climate change will be integrated into the proposals where possible, such as through the orientation of the buildings and energy and water efficiency.</p> <p>Legal agreement and conditions would be imposed to secure the provision of this appropriate mitigation.</p> <p>Developments within Sussex North must not add to the Arun Valley SPA, SAC and Ramsar Site- Sussex North Water Supply Zone impacts and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.</p> <p>Where an increase in water consumption is likely (including reserved matters), the Council will require the application to be accompanied by a water neutrality statement setting out the strategy for achieving water neutrality within the development. Water neutrality can be achieved by developers building</p>	<p>No significant and/or residual environmental impacts anticipated subject to the submission of a water neutrality strategy to be secure by way of condition or legal agreement.</p>

	<p>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>	
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Results of any relevant EU environmental assessment that is reasonably available	None applicable	
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Conclusion

EIA Required?	No
Statement of reasons	<p>The threshold for site area is exceeded in Schedule 2 of the EIA regulations. 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 Council has received a Position Statement (attached) from Natural England which states 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 (in effect all of Horsham District) must not add to this impact. The Position Statement is a new material consideration and the consequence of this is that Horsham District Council is unable to determine current planning applications positively unless it can be demonstrated they are 'water neutral'. Failure to achieve water neutrality would result in development conflicting with s.63 of the Conservation of Habitats and Species Regulations 2017.</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</p>

	<p>served within the Sussex North Supply Zone. Allied to providing water efficiency measures within the development there are therefore known options to potentially offset water usage on and off site. Such options are capable of being developed into a water neutrality strategy sufficient to pass Appropriate Assessment and therefore avoid adverse impacts on the Arun Valley. In the event the strategy is insufficient to pass Appropriate Assessment, it would not be possible to reasonably grant permission contrary to the Habitat Regulations. Subject therefore to the submission of a water neutrality strategy to be secured either by condition or legal agreement, the proposal will not result in the abstraction of water significantly affecting the integrity of the Arun Valley habitat sites.</p> <p>In summary, the screening assessment of the current pre-application 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/or offsetting mitigation, and that significant effects are not considered likely either alone or in combination with other development. The proposals would be of a sufficiently limited 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.</p> <p>It is therefore considered that, whilst the development is Schedule 2 development, it has been demonstrated that the proposed development will be unlikely to cause significant environment effects, and in this case, EIA is not required.</p>
Date	Matthew Porter 19-04-2022