

Head of Planning
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

04 August 2025
Ref: PC/Let/P2106

Dear Sir or Madam,

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017
(As Amended).**

**Request for a Screening Opinion under Regulation 6 for Requirement for EIA in
relation to Proposed Development of up to 90 dwellings at Land North of Guildford
Road, Rudgwick, Horsham**

We are writing on behalf of our client, **Welbeck Strategic Land IV** (the 'Applicant'), to make a formal request for a Screening Opinion to determine the requirement for an Environmental Impact Assessment (EIA) in respect of an outline application for the development of up to 90 residential dwellings at **Land North of Guildford Road, Rudgwick, Horsham** (The 'Site'). This request is made pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations').

In accordance with Regulation 6(2) the EIA Regulations, we enclose the following information:

- a) a plan sufficient to identify the land;
- b) a description of the development, including in particular:
 - i. a description of the physical characteristics of the development and, where relevant, of demolition works,
 - ii. a description of the location of the development, with particular regard to any the environmental sensitivity of geographical areas likely to be affected;
- c) a description of the aspects of the environment likely to be significantly affected by the development
- d) to the extent that information is available, a description of the any likely significant effects of the proposed development resulting from –
 - i. the expected residues and emissions and the production of waste, where relevant, and
 - ii. the use of natural resources, in particular soil, land, water and biodiversity; and

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- e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment

As set out within this letter, it is our view that an EIA would not be required to accompany a planning application for development on the Site. However, we are formally writing to the Council to request that the proposal is screened for completeness.

The Site

The site is an irregular-shaped parcel of land of approximately 4.41 hectares in size located immediately east of the junction of Guildford Road and Lynwick Street, adjacent to the Bucks Green settlement boundary.

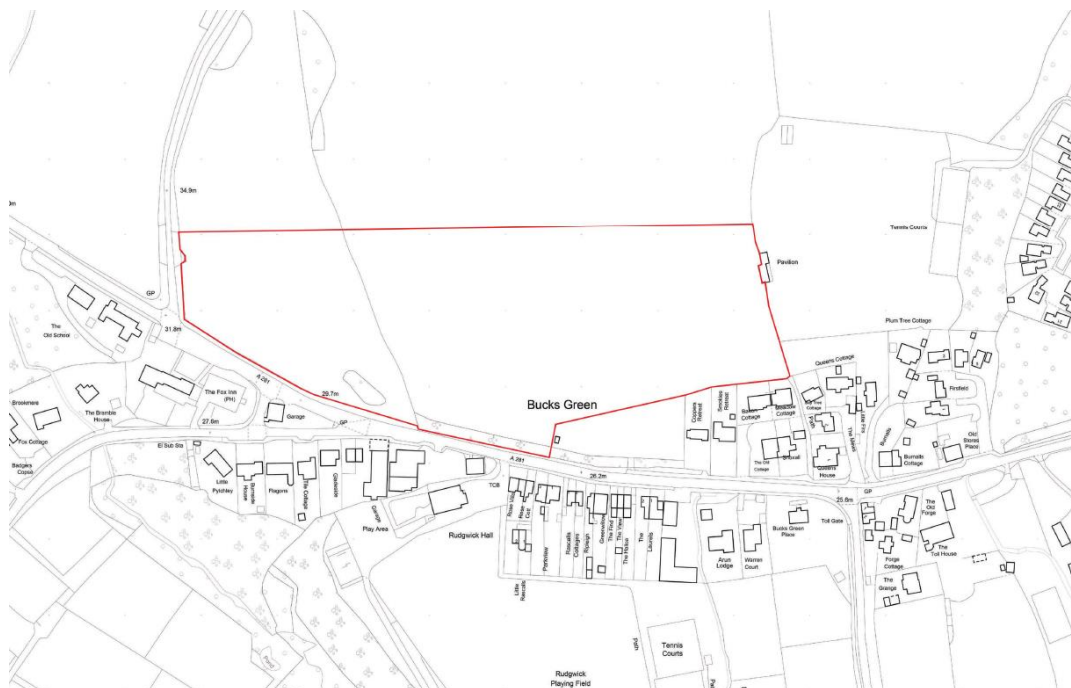


Figure 1- The Site (Red Line)

The site primarily comprises two open fields with mature trees and hedges to the southern, western and eastern boundaries. A belt of trees marks the field boundary in the eastern part of the site. The land rises gently from south to north.

Agricultural fields are located immediately to the north of the site. Lynwick Street abuts the western boundary beyond which is further agricultural land. Guildford Road comprises the majority of the southern boundary of the site with a pub, car dealership, garage and dwellings located in the immediate vicinity.

The south-eastern boundary of the site is adjacent to residential properties fronting Guildford Road and a triangular-shaped site which is a former pig farm which has a draft allocation in the emerging Horsham Plan for at least of six dwellings. Playing fields and sports pitches serving the Pennythorpe Preparatory School are located to the east of the site.

Vehicular access to the site is provided via Lynwick Street. There is also a public right of way passing along the eastern site boundary from Guildford Road in the south to Lynwick Street in the north.

The majority of the site has a proposed allocation in the emerging Horsham Local Plan for at least 60 dwellings.

The Site is not located in an Archaeological Notification Area (ANA). The Rudgwick Conservation Area is some 1.6Km to the north east. There are seven listed buildings along Guildford Road in the vicinity of the site.

The Site is located within Flood Zone 1. There are no Tree Preservation Orders within or adjacent to The Site.

Description of Development

The proposed development is for up to 90 residential dwellings, 40% of which would be affordable. The illustrative site layout includes surface water drainage features including attenuation ponds and swales, children's play space, community orchard, internal site roads and paths and an electricity sub-station.

The proposed internal path would provide pedestrian connectivity to the public right of way network to the east of the site. A pedestrian connection to Guildford Road to the west of the site would also be provided. In addition, the site would be large enough to accommodate landscaping, new trees, areas for Biodiversity Net Gain and open space.

Local Planning Policy Overview

A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision making process. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

In this case, the Development Plan comprises the Horsham District Planning Framework (2015) and the Rudgwick Neighbourhood Plan (2021).

It should be noted that the adopted Horsham District Planning Framework is out of date by reason of it being more than 5 years old.

The emerging Local Plan was submitted to the Secretary of State for Examination in 2024 and hearings commenced in December 2024. The appointed Inspector has since halted the hearings and written to the Council recommending it withdraw the Plan. The Council (at the time of writing) has not yet made a final decision as to how it will proceed following the Inspector's advice.

National Planning Policy Framework ("The Framework"), the Planning Policy Guidance ("The PPG") and Supplementary Planning Guidance are material considerations, including the "Facilitating Appropriate Development" adopted in October 2022.

Environmental Impact Assessment (EIA) Development

EIA development is defined within the 2017 (as amended) Regulations as either:

- a) Schedule 1 development; or

- b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

Schedule 1

Schedule 1 development is specifically defined in the Regulations as development likely to have a significant impact on the environment and would, by definition, require an Environmental Impact Assessment in every case.

Schedule 1 'descriptions of development' has been reviewed and the proposed residential development does not fall within the description of development for the purposes of the definition of Schedule 1 Development.

Schedule 2

Schedule 2 development is defined as development of a description mentioned in Column 1 of the Table in Schedule 2 where,

- a) *'any part of that development is to be carried out in a sensitive area; or*
- b) *any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;'*

The proposed development can be considered as an '*infrastructure project*', as defined by Schedule 2, and more specifically 10(b) which states '*urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas*'.

The proposed development would not meet the corresponding threshold listed in Column 2 of Schedule 2, as set out below:

- (i) *The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- (ii) *the development includes more than 150 dwellings; or*
- (iii) *the overall area of the development exceeds 5 hectares.*

The site is just under the 5 Ha overall area so being screened for the avoidance of doubt.

Ecology

Designated Sites

A Preliminary Ecological Appraisal (PEA) was undertaken in July 2024. It demonstrates that there are no designated sites within 2km of the Application Site.

The closest designated sites were Slinfold Stream and Quarry Site of Special Scientific Interest (SSSI) approximately c. 4.4km south-east and the Chiddingfold Forest SSSI approximately c. 5.1km east of the site's red line boundary. The Mens SSSI, Special Area of Conservation (SAC) was also located approximately c. 7.8km south-west from the site. Due to the distances involved and the features present between the proposals and these sites, it is not considered that these sites will be impacted directly by any proposed development.

Protected and Important Species

The PEA found that the habitats on site are predominantly common and widespread throughout the local area and the UK as a whole. Modified grasslands were dominant with scrub, treelines, and hedgerows being present along the field margins.

The habitats had the potential for supporting protected species including bats, badgers and dormice. Separate appropriate surveys were undertaken at the site and recommendations made to avoid and / or mitigate impacts when the site is developed (noting that no evidence of Dormice were found).

The ecological setting has been considered as part of the design process with all vegetation on the field margins retained. Tree removals are kept to a minimum and would be mitigated through new planting as part of the overall landscape proposals (including a new community orchard). This will ensure the retention of foraging and navigational features for bats and support birds which use the site for nesting and feeding (as identified in the surveys).

Conclusion on Ecology

It is considered that the proposals are not likely to have a significant environmental effect on habitats or species on the site, nor on designated sites. Environmental Impact Assessment is therefore not required on these grounds.

Heritage

A Heritage Impact Assessment (HIA) and Archaeological Desk Based Assessment (DBA) have been undertaken.

The application Site does not contain any designated heritage assets of archaeological interest, such as World Heritage Sites, scheduled monuments, registered parks and gardens or registered battlefields, and nor is the site located within an archaeological notification area.

The DBA concludes that the Application Site *“is unlikely to contain any extensive archaeological deposits of high significance or value which would require preservation in situ.”*

The HIA includes an assessment of impact on five nearby heritage assets, all of which are Grade II Listed Buildings. It concludes that *“the proposed development is found to have the potential to entirely preserve the significance of the five listed buildings.”* This conclusion is in keeping with the nature of an outline application where the final form of the proposal is not known. However, the proposed quantum of development can be accommodated within the site in a manner which will preserve the setting and significance of heritage assets.

It goes on to state that *“while resulting in a change on the application site, the proposals would amount to a minor change within the setting of the assets which have limited to no intervisibility with the site. All significance and special interest embodied within fabric of the listed buildings would be entirely unaffected and the proposed development would not, in any way, erode an ability to understand their heritage values typically as a series of 17th century rural and village dwellings.”*

The proposals are not likely to have a significant effect on heritage assets; therefore, Environmental Impact Assessment is not required on these grounds.

Flood Risk and Hydrology

The site is within Flood Zone 1 and therefore not at risk of flooding from rivers or the sea. Environment Agency (EA) maps for climate change also show the site as not being at risk. There are some very localised spots of surface water flooding which the project drainage consultants conclude are related to depressions in the land. These will be mitigated by the surface water drainage strategy.

The site is not located within an area at risk from Groundwater flooding. Further, infiltration testing did not encounter ground water when digging 2m below the surface.

A surface water drainage scheme has been prepared to support the outline application. This strategy demonstrates that development at the site would not result in any off-site impacts in terms of flood risk given surface water can be appropriately stored and its exit from the site controlled to green field rates or better.

The development will also need to demonstrate that it is water neutral given its location within the Sussex North Water Supply Zone. A water neutrality statement will support the application.

The proposals will not have an impact on drainage or flood risk. Environmental Impact Assessment is not required on these grounds.

Air Quality

The site is not located within or near to an Air Quality Management Area.

There is the potential for air quality impacts from fugitive dust emissions from the site during the construction phase. An Air Quality Assessment (AQA) has considered these impacts and recommends site-specific dust control measures to mitigate impact. Residual air quality impacts from dust generated by earthworks, construction and trackout activities are predicted to be not significant if these measures are followed.

A relatively low number of vehicle movements would be associated with the operational phase. Road traffic exhaust impacts are therefore predicted to be not significant.

The proposals would not have an impact on air quality to an extent that would require Environmental Impact Assessment.

Noise

There would be some construction noise anticipated during development associated with machinery and traffic. This would be at an insignificant level in the wider site context and is standard of any development of this scale. Mitigation measures would be implemented to ensure the level of noise would be controlled and ensure no significant impact to the nearby residents.

A Noise Assessment has been prepared and will be submitted with the planning application. It is likely that a Construction Management Plan would be requested via planning condition to secure implementation of mitigation.

EIA is not triggered by noise impacts of the development.

Transport and Highways

The site is located to the north of the A281 Guildford Road and to the east of Lynwick Street. The site is within close proximity to the A281 and the A24, in addition to a number of bus stops. The site is near to Rudgwick village centre and the amenities it offers.

The site offers good connections to the local footpath and highway network meaning it is within a sustainable location.

A Transport Assessment has been undertaken which concludes that identified traffic flows resulting from the development can be accommodated onto Guildford Road and further onto Church Street, Haven Road, Loxwood Road and Lynwick Street without material impact on the operational capacity of the road. As noted in the air quality section of this report, traffic would not be at a level which would increase emissions to a level which would trigger an EIA.

Environmental Impact Assessment is not required for this development on transport and highways grounds.

Landscape

The site is not located within or near any areas of designated landscape value. The site contains a number of trees and hedgerows though none are protected by Preservation Order or are designated Ancient Woodland or Veteran Tree status.

A small number of tree removals are required to facilitate the development. These will be compensated for through tree planting, undertaken as part of a comprehensive landscape plan that will support the planning application.

The landscape scheme includes a thick vegetated northern boundary to provide biodiversity increase and a natural screen to the wider countryside located to the north of the site.

Development of the site would not result in impacts on the landscape to the extent that an Environmental Impact Assessment is required.

Conclusion

The development would not result in any effects, alone or in combination, that would justify an EIA is prepared and submitted with the planning application.

The proposed development will be supported by a comprehensive set of plans, reports, studies and assessments, in addition to any other reports considered necessary by the Local Planning Authority. These reports include:

- **Planning Application and Notice Forms**
- **Planning Statement**
- **Statement of Community Involvement**
- **Location and Indicative Site Plan**
- **Design and Access Statement**
- **Landscape and Visual Impact Assessment**
- **Landscape Masterplan**
- **Arboricultural Impact Assessment**
- **Ecological Impact Assessment**

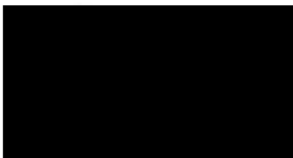
- **Preliminary Ecological Appraisal**
- **Dormouse Survey Report**
- **Breeding Bird Surveys**
- **Bat Activity Surveys**
- **Biodiversity Net Gain Metric**
- **Biodiversity Net Gain Feasibility Assessment**
- **Habitat Management and Monitoring Plan**
- **Transport Assessment (inc Appendices)**
- **Flood Risk Assessment and Drainage Strategy**
- **Water Neutrality Statement**
- **Heritage Impact Assessment**
- **Air Quality Assessment**
- **Phase I Geo-Enviro Desk Study**
- **Noise Impact Assessment**
- **Energy and Sustainability Statement**

These reports will fully assess any potential impacts as a result of the proposal and seek to mitigate where necessary.

In summary, the proposals do not comprise EIA development. A screening has been undertaken on a precautionary basis, and the proposals are not considered likely to have a significant effect on the environment by virtue of factors such as its nature, size or location.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning



Paul Carnell MRTPI
Associate Planner

Enc: Red Line Plan