



13 March 2026
Our Ref: 19.139/9. Applications

Horsham District Council
Chart Way
Horsham
West Sussex
RH12 1RL

Dear Sir / Madam,

LAND TO THE WEST OF BILLINGSHURST

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 SCREENING REQUEST

I am writing on behalf of my client, Hallam Land ('Hallam'), who control land to the west of Billingshurst. Hallam are minded to prepare a planning application for a residential-led mixed-use development on this land and are seeking, pursuant to Regulation 6, a Screening Opinion from the Local Planning Authority to determine whether the proposed development would constitute 'Environmental Impact Assessment' ('EIA') development.

In accordance with Regulation 6(2) we provide 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 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 the information is available, a description of any likely significant effects of the proposed development on the environment 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.

SITE DESCRIPTION AND CONTEXT

The site as shown on the 'Site Plan' at **Appendix 1**, is located to the west of Billingshurst and directly adjacent to the Built Up Area Boundary as defined in the Horsham District Planning Framework 2015 ('Local Plan'). The site is made up of a number of land parcels and has an area of approximately 36.9ha.

The site is currently used as agricultural land and is bordered by field margins and established hedgerows and mature trees along site boundaries. There are no existing structures or buildings on the site. Cedar Brook flows from north-east to south-west through the site into the Par Brook which runs parallel to the southern boundary.

Access to the site is currently provided for via Lordings Road / B2133 to the north-west. Pedestrian access is limited to two Public Right of Way's ('PROW') (BIL-1313 and BIL-1316) which extend across the middle of the site and the A29 to the east, connecting the site to Billingshurst.

The majority of the site is located within Flood Zone 1. The exception is the land surrounding Cedar Brook which is located within Flood Zones 2 and 3.

Reflective of the site's proximity to the Built Up Area Boundary, the immediately adjacent land uses comprise a combination of residential, infrastructure, agricultural and rural land uses, specifically:

- to the **north**, the site adjoins parcels of agricultural land which extend further north towards the A272 / Newbridge Road.
- to the **east**, the site adjoins the A29 which runs parallel along the entire length of the eastern boundary of the site where beyond is the established residential area of Billingshurst.
- to the **south**, the site adjoins the Brockhurst Brook, Par Brook, Great Lordings Wood and the northern edge of an existing sewage treatment works.
- to the **west**, the site adjoins Lordings Road / B2133.

With regards to its wider context, the site lies to the west of Billingshurst which provides access to a range of services and facilities as well as public transport links. Billingshurst is identified as a Small Town / Large Village within the Local Plan development hierarchy. These settlements are second in the hierarchy and *'act as 'hubs' for smaller outlying villages, helping to minimise longer distance, unsustainable travel patterns from the smaller settlements.'*

PROPOSAL

The proposed development comprises a residential-led mixed-use scheme which includes the following elements:

- Up to 450 dwellings, including 35% affordable housing;
- A mixed-use local centre with a range of local services and amenities;
- A new primary school;
- A flexible work space building;
- The creation of an internal street network, including pedestrian and cycle routes;

- A new junction connecting the site to the A29 and the redevelopment of the existing access from Lordings Road;
- New areas of accessible public open space including the formation of a large green space to the south and new planting as a part of a wider green infrastructure network on the site; and
- Drainage infrastructure, including sustainable drainage features ('SuDS').

The development will enable comprehensive growth to the west of Billingshurst which will provide for a range of housing types, commercial and educational land uses to meet local needs, alongside a high-quality open space and green infrastructure network.

An Illustrative Masterplan is included at **Appendix 2**.

REQUIREMENT FOR AN EIA

This Screening Request is made in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which requires planning applications for certain forms of development to be accompanied by an EIA.

Whilst all development that falls within Schedule 1 will require an EIA to be undertaken, this is not mandatory for development listed in Column 1 of Schedule 2. For development listed therein, it will be for the Local Planning Authority to make its own formal determination of whether or not there are likely to be *"significant effects on the environment by virtue of factors such as its nature, size or location"*. If it is concluded that the proposed development would lead to significant effects on the environment by virtue of such factors as its nature, size and location, then an EIA would be required.

The proposed development does not fall within Schedule 1 of the 2017 EIA Regulations. The proposed development is Schedule 2 development as identified in paragraph 10(b), by virtue that it is an urban development project which includes more than 150 dwellings on a site larger than 5ha.

In determining whether the proposed Schedule 2 development is likely to have a significant environmental effect, the Regulations require that the following criteria must be considered:

1. The characteristics of development;
2. The location of development; and
3. The types and characteristics of the potential impact.

Each criterion is discussed in turn below.

Characteristics of development

The proposed development would provide up to 450 houses, a local centre, primary school and other infrastructure across an area of 36.9ha immediately adjacent to the Built Up Area Boundary of Billingshurst. The proposal has been designed to enable a natural extension of Billingshurst. Once completed, the scale and layout of the development would align with the character of the adjoining residential area, with extensive areas of green infrastructure and open space to ensure the site is well integrated into the surrounding landscape.

The majority of the site is a mixture of arable land and improved grassland, with lines of hedgerows and mature trees along the parcel boundaries. These existing habitats, in particular the hedgerows and mature trees, will shape the character and quality of the development and form the basis of the proposed green infrastructure and open space network. This network will see the creation of a range of habitats, promote ecological connectivity and increase biodiversity overall on the site.

The area surrounding Cedar Brook will also form part of the wider green infrastructure and open space network on the site. This will include the retention of existing hedgerows and mature trees along the riparian areas of the brook. No housing is proposed to be located within the area which is subject to Flood Zones 2 and 3. These measures will ensure that the development does not increase flood risk on or off the site or is a risk to human health.

Surface water and potential flood risk will also be managed through an on-site SuDS strategy which will be designed in line with national guidance.

Access to the site will be gained via a new junction onto the A29 to the east, with a further connection off Lordings Road to the west. The construction of the new junction will require the use of an additional smaller area of vegetated land adjoining the A29. This is necessary to provide the required transport infrastructure to service the development. The PROWs which extend through the middle of the site will also be maintained and enhanced as part of the development.

Whilst the site is currently used for agricultural purposes, the land is identified as Grade 3b. Therefore, the proposal will not result in any loss of the best and most versatile agricultural land.

Future occupants will place additional demand on social and community infrastructure, have economic effects on the local economy, and increase everyday use of the surrounding highway network and public transport. The development proposes additional commercial and community infrastructure in the form of a local centre and primary school which will support accommodating demand. An increase in car movements could also give rise to noise and air quality effects, in particular along the A29. However, it is considered that these would be commensurate with a general increase in traffic in an urban area.

The site adjoins an existing sewage treatment works along the southern boundary. An appropriate odour buffer zone has been incorporated into the masterplan to separate the proposed housing from the southern boundary. This will ensure there is an acceptable level of amenity for future occupants.

The development will inevitably result in operational waste including typical domestic and municipal waste. These will be collected, recycled and disposed of in accordance with Horsham District Council Policy.

Pollution and risk of accidents arising from construction will be controlled via a Construction Environmental Management Plan ('CEMP'). Therefore, if carried out in accordance with the relevant health and safety procedures, the development will not increase pollution, nuisance or the risk of accidents above an accepted level. The operational phases of development will not create levels of pollution or nuisance over the appropriate environmental standard.

Location of Development

Existing and approved land use

The site is currently used for agricultural purposes and is therefore identified as greenfield land. While the proposal will result in a loss of undeveloped land, the development of the site for residential, commercial and educational uses is considered appropriate. The site is within a sustainable location with high accessibility to sustainable transport modes, amenities and services, and presents an opportunity to provide additional housing supply within Billingshurst.

The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

The site is not likely to be at risk of contamination and is within a low-risk groundwater vulnerability zone. In addition, the land around Billingshurst is identified as Grade 3b which is not classed as the best and most versatile agricultural land.

An initial assessment undertaken by EDP concludes the majority of the site is of limited ecological value, with the exception of the existing lines of hedgerows, trees and watercourses which will be retained as

part of the development. The site is not subject to, or is immediately adjacent to any ecological designations. The assessment considers that due to the existing separation and lack of hydrological connections, the majority of the wider surrounding ecological designations will not be impacted by the proposal. The Upper Arun Site of Special Scientific Interest ('SSSI') is located approximately 260m north-west of the site and has a direct link to the site. The assessment concludes that any impacts on this SSSI will not be significant and can be appropriately mitigated through standard measures and masterplanning. These include the implementation of a CEMP, a development buffer from linked watercourses, and refocusing recreational effects to new public open spaces as part of the proposal.

The site is within the Brick Clay Resource Mineral Safeguarding Area as identified in the West Sussex Minerals Local Plan. This designation covers an extensive tract of land across the Horsham District and therefore affects all potential sites and proposals for development in Billingshurst. The site makes up only a small part of this safeguarded area with sensitive development located immediately to the east and the sewage treatment works to the south. The mineral resources are therefore effectively sterilised where extraction would be neither economic nor feasible.

Accordingly, it is considered that the proposed development is appropriately located where there are no environmentally sensitive attributes that warrant an EIA.

The absorption capacity of the natural environment

The following European sites are located within the wider context of the site:

- Arun Valley Special Protection Area ('SPA'), approximately 6.8km south-west.
- The Mens Special Conservation Area ('SAC'), approximately 3.3m north-west
- Ebernoe Common SAC, approximately 8.6km west.

As outlined above, the assessment undertaken by EDP concludes that due to the existing separation and lack of hydrological connections these ecological designations will not be impacted by the proposal.

The Ebernoe Common National Nature Reserve ('NNR') is located approximately 8.6km from the site. Like the SAC, this designation will also not be impacted by the proposal.

The southern boundary of the site adjoins the Great Lordings Woodland, an area of ancient woodland. A smaller parcel of ancient woodland also adjoins the southern boundary to the east of the sewage treatment works. The development proposes to establish a country park and 15m landscape buffer along the southern boundary of the site. This will ensure any potential impacts from the development on the ancient woodlands are appropriately managed.

The riparian areas around Cedar Brook will be enhanced as part of the on-site green infrastructure and open space network. Existing hedgerows and mature trees will be retained, alongside additional planting. No housing is proposed within the riparian areas.

The Horsham District Council Landscape Capacity Assessment identifies the site as of Moderate landscape value based on the wider areas' proximity to the A29, ecological interest including the ancient woodlands, and public footpaths. A Landscape and Visual Technical Note prepared by Urban Wilderness concludes that whilst the site has rural characteristics, the landscape value and tranquillity is greatly reduced due to glimpsed views and noise generated from the A29, odour and views from the adjoining sewage treatment works, and glimpsed views of Billingshurst. Whilst the site is on a slope, it is also visually contained and therefore not sensitive to long-range views. In addition, the site does not lie within or adjacent to any designated landscapes. It is considered that together, these elements reduce the perceived rural nature of the site.

While the site is considered to have reduced landscape value and is not subject to any relevant designations, the masterplan still ensures that the development will be well integrated into the

surrounding setting. This will be achieved through the retention of existing landscape features and creation of a green infrastructure and open space network.

Based on the above, it is considered the surrounding natural environment has capacity to absorb the proposed development.

Types and Characteristics of the Potential Impact

The proposed development will give rise to an increase in the number of people who live at Billingshurst. In the context of the size of the settlement this is not considered significant or disproportionate to the role and function of Billingshurst as a Small Town. The development also proposes an additional local centre, primary school and other infrastructure to manage the increase in demand for services.

Any potential construction effects will be temporary and typical of a proposed development of this scale. The implementation of a CEMP will ensure that the works are appropriately managed where they are not anticipated to generate any significant environmental effects.

Landscape and Visual: The existing character of the site is undeveloped, agricultural land with existing lines of hedgerows and mature trees bordering the various land parcels. The Landscape and Visual Technical Note considers that the overall landscape value of the site is reduced due to the adjoining A29, sewage treatment works and the residential area of Billingshurst to the east. In addition, the site is not subject to or immediately adjacent to any landscape designations.

Considering the above, it is acknowledged that the proposal will still result in an inevitable change to the site's rural character. As such, the masterplan has carefully considered the landscape setting and dedicates a large area of the site to the creation of a green infrastructure and open space network. This approach will ensure that the development is well-integrated into the surrounding setting and conserves the landscape character.

Overall, whilst the proposal will be subjected to a full Landscape and Visual Impact Assessment as part of the future application, it is considered that the site has capacity for the development. The site has a reduced landscape value which is already influenced by existing urban features, presenting an opportunity to provide additional housing and services in a sustainable location. The proposal will however also retain existing landscape features and create a green infrastructure network to help conserve the openness of the site and integrate it into the surrounding landscape. It is considered the proposal will not result in significant landscape effects.

Ecology: As outlined above, the site is not subject to or immediately adjacent to any ecological designations and the majority of the site is of limited ecological value. To support habitat creation and the overall biodiversity value of the site, the development proposes an on-site green infrastructure network. This will include the retention of important ecological features which will be supplemented with additional planting. The initial assessment by EDP considers that any impacts on surrounding ecological designations will not be significant and can be appropriately mitigated through standard measures and careful masterplanning. It is considered that the proposal will not have significant adverse effects on ecology. An Ecological Assessment ('EcIA') will be prepared and submitted with the future planning application.

Transport: The proposed development will generate increased traffic on the local highway network, in particular the A29. Initial modelling concludes that the increase in traffic is within daily variations of traffic flow where any increase will be indiscernible. Given the site's sustainable location, the proposed junction connecting to the A29 will provide safe and direct access between the site and Billingshurst's amenities and services. This includes bus routes and the Billingshurst train station which is approximately a 20-minute walk from the site. Overall, the modelling confirms that there will be a negligible impact on the surrounding highway network.

Noise: The A29 adjoining the eastern boundary of the site has the potential to generate adverse noise impacts on future occupants. It is considered that any potential noise impacts can be appropriately mitigated through the implementation of a landscape buffer and existing earth bunds which will be

retained along the eastern boundary. In addition, dwellings will be setback from the eastern boundary and can be designed to ensure internal noise limits are achieved. A Noise Assessment will be prepared and submitted with the future planning application.

Air Quality: The site is not located within an Air Quality Management Area. The development of the site is not anticipated to result in any unacceptable levels of air pollution, any potential effects on local air quality from the construction and operation of the proposed development can be appropriately managed. This includes through the implementation of a CEMP and promoting sustainable modes of travel.

As outlined above, an odour buffer zone has been incorporated into the masterplan to ensure the proposed housing is appropriately setback from the southern boundary. This will ensure there is an acceptable level of amenity for future occupants and any potential odour impacts from the treatment works are avoided.

An Air Quality Assessment and Odour Assessment will be prepared and submitted with the future planning application.

Flood risk: The majority of the site is not within an area of flood risk. Existing planting along the riparian areas of the Cedar Brook will be retained as part of the wider on-site green infrastructure network which will support the management of surface water and flood risk on the site. No housing is proposed to be located within the areas around the brook subject to flood risk. In addition, flood risk will also be managed by the proposed on-site SuDS strategy. A Flood Risk Assessment and Drainage Strategy will be prepared and submitted with the future planning application.

Heritage: There are no heritage assets within the site or directly adjoining the site. The closest assets are three Grade II listed buildings between 170m – 260m from the north-east corner of the site. The proposed development will not have an impact on these heritage assets or their setting.

Agricultural land: The development of the site will not result in the loss of the best and most versatile agricultural land.

Further considerations: The economic impact of the proposal would be beneficial in terms of the employment generated by the new local centre, primary school and during the construction period. In terms of social benefit, the development will contribute to housing supply, including affordable housing, and increase the number of local amenities and services within Billingshurst. A Section 106 agreement or a Community Infrastructure Levy payment will also ensure mitigation is provided where required.

Cumulative effects: At the time of submitting this Screening Request, there are no larger-scale development schemes in proximity to the site which are approved or pending approval. There are also no further allocations in the adopted Local Plan which have not already been delivered in Billingshurst.

It is noted that an EIA Scoping Opinion was submitted on 2nd February 2025 for a residential-development for up to 1,100 dwellings, a primary school, care provision, a community centre, retail space, sports facilities, public open spaces and associated infrastructure at Newbridge Park, Land West of Billingshurst (EIA/26/0003). This is located to the north of the site. In the event of both these proposals coming forward, these may generate cumulative effects of a scale or nature that would constitute potential significant environmental impacts.

We are also aware a development of up to 79 dwellings is currently proposed to the south-east of the Billingshurst. We do not consider this has the potential for significant cumulative effects.

PLANNING APPLICATION TECHNICAL INFORMATION

Whilst the proposed development does not, in our view, require an EIA, the potential effects will be assessed through technical assessments which will accompany the future planning application. A list of these assessments is included at **Appendix 3**. This technical work will provide a full understanding of the

environmental impacts of the proposed development and will meet national and local planning application validation requirements.

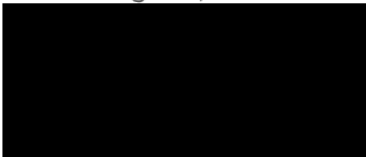
CONCLUSION

In our opinion, although the proposal is a Schedule 2 development, the development itself is not likely to have significant effects on the environment by virtue of factors such as its nature, size and location. Accordingly, an Environmental Statement should not be required to accompany a planning application. We formally request the Local Planning Authority's opinion in this regard. However, taking into account the potential for other residential-led development to the north of the site, the proposal may contribute to cumulative impacts when assessed in combination with these future developments.

I trust that you find this Screening Request to be in order. I note that, in accordance with Regulation 6(6)(a), your Authority has three weeks from receipt in which to adopt a Screening Opinion.

If you require any further information, please do not hesitate to contact me.

Kind regards,



Owen Jones

Director

LRM Planning Ltd

