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Dear Mr Smith

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Request for an EIA Screening Opinion

Savills has been instructed to prepare a planning application for the redevelopment land to provide up to 300 residential units and up to 25,000 sqm of commercial floorspace at former Novartis Research Site, Parsonage Road, Horsham by West Sussex County Council (WSCC).

Prior to preparing the planning application, we formally request the Planning Authority's Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations).

In accordance with Regulation 6(2) please find enclosed:

- A description of the development, including the physical characteristics and location of the development;
- A description of the aspects of the environment likely to be significantly affected by the development;
- Where information is available, a description of any likely significant effects of the proposed development on the environment;
- A plan sufficient to identify the land.

Description of the Site and Proposed Development

The Site

The proposed development site measures approximately 7.5 Hectares (Ha) and comprises the former Novartis Pharmaceuticals site ('the site') which is located within the defined settlement of Horsham town. (see Drawing No. RL001).

The site is of an irregular shape bound by Wimblehurst Road and Parsonage Road to the west and north. The south western and east boundaries of the site are formed by railways lines linking with Horsham Station. Access to the site is currently provided from Parsonage Road and Wimblehurst Road.

Now vacant, previously the site was in use for pharmaceutical research, development and manufacturing, since 1938, with Novartis operating from the site since 1996. The site formerly comprised various buildings, office blocks and workshops associated with its previous use. The Horsham site was in operation from the late 1930s and ceased operations in June 2014. At its peak the site employed some 1,400 people in Horsham, with over 400 people working on site at the point of closure in 2014.

In terms of site coverage, the majority of built form was located towards the south eastern side of the site, comprising large workshops. Towards the north / north west, the density and site reduced considerably, where more verdant parcels and landscaping features were present, along with a tree lined avenue entrance off

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Wimblehurst Road which remains in situ. This served as the main entrance to the site. A separate exit point was (and remains) onto Parsonage Road. It is understood that this also served as the main egress for delivery vehicles. A further access point to Parsonage Road is located in the north western corner. Large areas of hardstanding are present which were formerly used for parking.

Since Novartis vacated the site, the majority of buildings have been demolished. One building however remains. This is a large circa.1938 central structure that was used for offices that was extended in the 1960's and 1980's. The remaining building is part 3 part 5 storey, with a central tower projecting above, and a courtyard garden. It also benefits from a basement which served as a plant room.

Surrounding the site, development is predominantly residential to the north and west. To the east is predominantly commercial land with a general industrial area located beyond the railway line. To the south-west is a large area of sports pitches and open land which forms part of the College of Richard Collyer. Further south of the site is Horsham Town Centre. Being within a relatively central location within the town, there is very good access to public transport, including Horsham rail station, providing good access to with for both local and regional travel.

The Environment Agency Flood Map for Planning shows that the site is within Flood Zone 1, being defined as low risk of flooding from Rivers or the Sea (less than 1 in 1000 annual probability of flooding from rivers or the sea).

The Site does not lie within or adjacent to any designated sites of nature conservation (SSSI, SAC, SPA, Ramsar). The closest non-statutory designated ecological site is the Warnham Local Nature Reserve located approximately 0.7km to the north west at its closest point. The closest statutorily designated site is St Leonard's Park Ponds located approximately 2km to the south east at its closest point.

The building remaining on the site is included on Horsham District Council's Horsham Town Local List (February 2011). This identifies the building as being of local historic interest:

"The original pharmaceutical building remaining on the site facing Wimblehurst Road. Built in pale buff brick to a modern international style, typical of the interwar period. The tall central tower over the doorway forms a focal point to the long drive from the entrance. c. 1939."

There is also a pair of gate lodges at the western entrance to the site, which although not separately identified as being of architectural or historic importance, may contribute to the setting and significance of the main building.

To the south west of the site, separated from it by a railway cutting, is the Richmond Road Conservation Area. The next closest designated heritage asset is Parsonage Farmhouse (ID1353940), a Grade II listed building located approximately 470m to the north east. The Horsham Conservation Area is located approximately 1km to the south west.

Site History

The planning history for the site includes application DC/12/2341 for *"Prior Notification for the demolition of a number of buildings on The Site including boiler house, chiller building, production and stores building, cycle rack, restaurant, document management centre, engineering building, ancillary services building, systems recovery building, gas convertor station, water store, entrance gatehouse, archive building, development building, despatch building, temporary offices and sprinkler tank"*. Prior Notification was agreed in June 2013.

A prior notification was subsequently submitted and refused on the basis that prior approval was required from HDC for a revised demolition proposal under application DC/14/1975 (determined in November 2014). Following this, an application was submitted (DC/15/2109) for *"Demolition of: Building 6 Coal Hopper, Building 7 - Water Treatment and Sub-station, Building 8 - Boiler House, Building 17 - Solvent Store, Building 30 -*

Solvent Store, Building 31 Waste Management Centre, Building 32 Solvent Drum Store, Building 42 - Research Building" and was approved in November 2015.

In May 2013 planning permission was granted for the creation of an new access (DC/14/1708).

In March 2015 an EIA Screening Opinion was requested from Horsham District Council (HDC) in relation to the redevelopment of the site for a new higher education campus. In April 2015 HDC issued a formal EIA Screening Opinion (EF/Scr/1507) which concluded that whilst the proposed development exceeded the relevant thresholds for a Schedule 2 development *"…the overall scale and nature of the impacts that would arise from the scheme do not require an EIA, and that the environmental issues arising from the development can be dealt with as part of the usual planning application process"*. This Screening Opinion is enclosed with this letter.

Proposed Development

The development description for the outline planning application is anticipated to be:

"Redevelopment to provide up to 300 residential units and up to 25,000 square metres of commercial (grade 1 office / flexible business) space, including the conversion of building number 3 into flats and conversion of building number 36 into flats with a mixed use ground floor, utilising existing accesses off Wimblehurst Road and Parsonage Road, and provision of new landscaping and open space."

An illustrative masterplan showing how the proposals could be delivered is appended to this letter to assist understanding of the proposals although it should be noted that this plan should not be used as a basis for assessment. The illustrative masterplan shows the locations of buildings 3 and 26 that are to be retained.

This EIA Screening Opinion Request is made in respect of the above description of development as opposed to any indicative detail shown on the illustrative masterplan.

<u>New Homes</u>

The provision of up to 300 new homes will take place within one third of the site, and will be located on land that lies between Wimblehurst Road and the existing art deco building. The tree lined avenue will be retained and maintained as part of the redevelopment of this part of the site.

The new homes are currently anticipated to be provided in a range of 2 to 3 storeys structures. In addition, the existing central art deco building and extension will be converted into flats, albeit the intention is to utilise the ground floor of the extension building to provide a community hub or range of mixed use spaces that will help to integrate the commercial and residential aspects of the proposed development.

In terms of unit mix, a range of dwelling types, sizes and tenures will be accommodated in the development. our client, WSCC will also be seeking to deliver a policy complaint level of affordable housing within the development (35%).

The residential development will be accessed off the existing access point from Wimblehurst Road. The two existing gate houses in this location will be demolished and replaced with new buildings that will create an inviting entrance to the site. The tree lined avenue, and resultant view towards the locally listed heritage asset will also be preserved.

<u>Commercial Development</u>

The remaining two thirds of the site are proposed to provide new commercial space. It is expected that this will be Grade 1 Office space with a range of unit sizes to meet varying community needs. In addition, smaller incubator units will be provided and these are currently expected to be provided adjacent, or in close proximity to, the site access off Parsonage Road. All commercial space and business park will be solely served from the existing Parsonage Road access point.

It is intended that there are no through routes in the site, other than potentially an access controlled route providing an emergency access if required. This would also, in itself, serve as a pedestrian and cycle route through the site.

As a whole, it is anticipated that no more than 25,000sqm of new commercial floor space will be provided in a range of buildings between 2 and 5 storeys in height.

Car parking for the commercial space is currently expected to be provided through decked parking structures.

EIA Screening Process

Development that falls within Schedule 1 of the EIA Regulations always requires EIA and is referred to as 'Schedule 1 development'. Development listed in Schedule 2 that is located in a 'sensitive area' (as set out in Regulation 2(1)), or, exceeds one of the relevant criteria or thresholds given in Schedule 2 is referred to as 'Schedule 2 development'. Not all 'Schedule 2 development' will require an EIA, only that development likely to have significant environmental effects due to its size, location or nature. Development that requires EIA is referred to as 'EIA development'.

As set out in the below tables, the proposed development is not Schedule 1 development but falls within the description in Schedule 2 Part 10(b) 'Urban Development Projects'. The proposed development (as described above) is not located within a sensitive area but would exceed the relevant criteria in Schedule 2 (150 dwellings, more than 1ha of non-residential development, site size of over 5ha) and therefore comprises Schedule 2 development. As such, the proposed development would constitute EIA development if it is likely to have significant environmental effects.

As set out in the tables below, the proposed development is not likely to result in significant effects on the environment. As such, the proposed development is not EIA development.

This conclusion is in line with the recent EIA Screening Opinion issued by HDC in relation to a previous Urban Development Project on the site. This Opinion is supported by relevant EIA guidance provided in the Planning Practice Guidance (PPG) which states that *"Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment (Paragraph: 018 Reference ID: 4-018-20170728).*

The PPG provides further guidance in the form of indicative thresholds to assist in the screening of Schedule 2 development. These state in relation to Urban Development Projects that: *"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination."* As set out above, the site is previously developed land and the proposed development is not of a significantly greater scale or different nature than the previous use. As set out below, the site has been subject to a series of ground investigations and associated remediation work which demonstrate that there is not a high level of contamination on site and that any remaining contamination can be suitably managed as part of any future redevelopment.

The number of residential units proposed is substantially below the figure of 1,000 dwellings that is referred to in the PPG as an indicative threshold for considering whether an urban development project might require EIA.

Application Thresholds		
i.	Does the Proposed development fall within Schedule 1 (Y/N)?	No
ii.	If yes, what is the applicable description?	n/a
If yes, the Proposed development automatically requires EIA		
iii.	Does the Proposed development fall within Schedule 2 (Y/N)?	Yes
iv.	If yes, what is the applicable description?	10(b) Urban Development Project
v.	Is any part of the Proposed development to be carried out in a defined Sensitive Area (see Regulation 2(1))	No
vi.	What is the applicable threshold/criteria in Schedule 2?	The development includes more than 150 dwellings or 1ha of non-residential development or the overall area of the development exceeds 5 hectares.
vii.	Does the Proposed development meet/exceed the applicable threshold (Y/N)?	Yes, as the proposed development proposes more than 150 dwellings, more than 1 hectare of non-residential development and the overall site area exceeds 5 hectares.

Possible effects on the environment
The following information has been prepared with reference to the selection criteria for screening Schedule 2 development, provided in Schedule 3 of the EIA Regulations: 1. Characteristics of development (a) – (g) (of the Regulations) 2. Location of development (a) – (c) (of the Regulations) 3. Characteristics of the potential impact (a) – (h) (of the Regulations)

Topic	Analysis
Accidents and Natural Disasters	The site's location within the UK is such that natural disasters, including those caused by climate change, are not considered to represent a likely risk to the proposed development. For example, it is considered that the likelihood of an earthquake with a magnitude sufficient to cause damage to buildings and/or loss of life occurring and impacting the Site is extremely low. Given the nature of the proposed development, the potential for either large volume storage or frequent passage/ delivery of fuels and chemicals during either the construction phase or following completion, is considered to be low when compared to more industrial development proposals such as chemical works, storage depots, docks, or major highways. The proposed development will be designed in accordance with recognised and accepted best practice, in terms of highway design, specification of drainage and current building regulations.

Topic	Analysis
	It is therefore considered that whilst there is always a potential risk that an accident, fire or natural disaster could result in a significant environmental impact, this risk can be appropriately mitigated through embedded design measures and through compliance with statutory design guidelines. Therefore, significant effects are considered to be unlikely.
Air Quality and Odour	The site does not lie within an Air Quality Management Area (AQMA) and the proposed development does not include any emission sources on site likely to generate air quality impacts. Taking into account the previous use of the site and the nature of the proposed development, the proposed development is not considered likely to alter the nature or extent of any impacts upon local air quality. Potential construction phase air quality impacts from fugitive dust emissions and construction phase traffic could occur as a result of earthworks, construction and trackout activities. However, in accordance with the Institute of Air Quality Management (IAQM) guidance Assessment of Dust from Demolition and Construction, the implementation of suitable mitigation measures will ensure that no significant air quality impacts result from construction activities. Based upon a conservative projection of the initial development traffic forecasts, the level of traffic likely to be generated by the proposed development, it is considered unlikely, in EIA terms, to result in significant effects related to air quality. Notwithstanding the above, the application will be supported by a robust Air Quality Assessment to identify any necessary suitable mitigation measures to avoid and, where required, mitigate any potential adverse impacts. As such, significant effects related to air quality are considered to be unlikely.
Archaeology	No Scheduled Monuments, Registered Parks and Gardens or Designated Battlefield Sites are located either within or in proximity to the site. An Archaeological Desk-Based Assessment (DBA) has been undertaken in relation to the site and proposed development and considers the potential for redevelopment of the site to result in archaeological impacts. The DBA established that there is little or no recorded evidence for prehistoric, Roman or early medieval activity in the area immediately around the Site and within it. Overall, the site has been severely impacted by previous construction and demolition activity. The DBA concludes that: *"These previous impacts, combined with the relatively low archaeological potential of the Site prior to development, means that the proposed re-development would have little to no impact on the local archaeological resource."* As such, significant effects related to archaeology are not considered likely to result from the proposed development.
Climate Change	The proposed development will result in greenhouse gas emissions from both vehicles and plant, during both the construction and occupation phases of development. In line with current and emerging guidance and standards, such emissions will be minimised

Topic	Analysis
	through the adoption of best practice working and construction methods. During the construction period, such measures would be delivered through a detailed CEMP that would be secured via a standard planning condition. Emissions during the occupation phase will be minimised through the scheme design and installation, where possible, of modern and efficient plant. The proposed development itself will be designed to be resilient to the potential effects of climate change e.g. increased flood risk. Taking into account the implementation of suitable mitigation measures and the nature and size of the proposed development, including the likely length of the construction programme, significant effects related to climate change are considered unlikely. A Energy Statement and a Sustainability Statement will be included with the planning application.
Construction Practices and Waste	During the construction phase of the proposed development, all legislative requirements will be met. As such, construction practices will be suitably managed in accordance with best practice and/or existing management systems, to avoid impacts upon health and wellbeing. The implementation of measures identified in a comprehensive CEMP, will ensure that waste generation both on and offsite is minimised through a variety of measures, including: • the re-use and recovery of waste will be encouraged by identifying opportunities for the on-site re-use of materials; • construction materials will be sourced locally where these are available. Where practical, the procurement of construction materials will seek a high proportion of recycled material, provided that this does not adversely affect the integrity and durability of the materials; and • in line with modern design and construction practices, the use where possible of pre-fabricated units during construction will contribute towards minimising waste arising. Through the adoption of suitable construction methods specified in the CEMP, it will be ensured that the proposed development is undertaken in a sustainable manner and will avoid unnecessary consumption of natural resources. The nature of the proposed development is such that excessive or abnormal waste generation is unlikely to occur during either the construction or occupation phases. During the construction phase of the proposed development, best practice construction methods will be adopted, controlled via a CEMP to ensure that construction waste is appropriately managed, including onsite re-use and recycling wherever practicable. It is therefore considered that, with the adoption of suitable measures set out in a CEMP, the construction and operation of the proposed development is unlikely to result in significant environmental effects. A Construction Management Plan will be included with the planning applications.

Topic	Analysis
Ecology and Trees	A Preliminary Ecological Appraisal of the site was carried out in July 2018. With the exception of a number of mature and semi-mature trees on site, the site is generally considered to be of low ecological value overall. Due to the presence of suitable habitats on site for bats and reptiles, further protected species surveys are underway. Depending on the findings of the completed surveys, a number of mitigation measures will be designed and implemented to ensure that any adverse impacts on protected species as a result of the proposed works is minimised. These measures will include but not limited to sensitive timing of the demolition/vegetation removal works, presence of ecological clerk of works, retention of suitable habitats, provision of replacement habitats such as bat boxes/bricks, sensitive lighting strategy, biodiversity enhancement measures and input into the soft landscaping design. By implementing the necessary mitigation measures during the construction and operational phase, no significant effects on biodiversity are considered likely.
Flood Risk and Hydrology	The site is within Flood Zone 1, being defined as low risk of flooding from Rivers or the Sea (less than 1 in 1000 annual probability of flooding from rivers or the sea). The site is not at risk from reservoir flooding. The site overlies a Secondary 'A' Aquifer but is not located within a Groundwater Source Protection Zone. The nearest natural watercourse is Channels Brook which drains into Warnham Mill Pons approximately 0.79km to the north west. Since the site is located more than 500m away from any natural watercourse, it is considered to be far enough not to have an impact on the water quality of these waterbodies. There are no surface water features within the site itself. Parts of the site (predominantly associated with the footprints of the now demolished buildings) are identified on the Environment Agency flood mapping as at 'low' to 'medium' risk from surface water flooding. The rest of the site is identified as at 'very low' risk from surface water. Taking account of the characteristics of the site, the proposed development is not anticipated to materially increase the overall area of impermeable surfacing from that which is either currently present on the site or has historically been present. It is proposed that the proposed development will continue to discharge foul and surface water to the combined water sewers surrounding the site to ensure that foul and surface water are effectively managed and that the risk of flooding is not increased on or off site. In relation to water quality, with the implementation of standard mitigation measures during the construction process and ensuring that piled foundations do not interact with groundwater resources, no significant effects are anticipated. As such, significant effects related to flood risk and hydrology are considered to be unlikely. A Drainage Strategy will be included with the planning application.

Topic	Analysis
Ground Conditions	The site is underlain by the bedrock of the Upper Tunbridge Wells Sand – Sandstone and Mudstone, which is considered a Secondary 'A' Aquifer. There is a consistent layer of Made Ground across the site (Max 5m depth), generally between 1 to 3m thickness. The Made Ground is described as both cohesive and granular consisting of mixed proportions of clay, sand and gravel and including crushed concrete, brick and stone. The site is not located within a Groundwater Source Protection Zone (SPZ) and there are no active groundwater abstractions within 1km of the site. The nearest surface water feature is an un-named river located 327m north east. The site has been subject to a series of ground investigations, remediation and assessment including approximately 100 trial pits, 75 window sample boreholes and substantial chemical testing. These investigations have found areas of contamination which has resulted in remediation works being undertaken in areas of the site alongside recommendation for mitigation measures to prevent impacts. In 2016 KDC Contractors Ltd (KDC) were instructed by Novartis Pharmaceutical (Novartis) to undertake a Land Quality Assessment of the site. A phased approach of investigation and remediation was undertaken culminating in a Land Quality Interim Report in November 2016. The Land Quality Interim Report concludes that there are areas that construction workers and future residential users could be at risk (due to trace asbestos fibres, elevated inorganics and PAH concentrations). However, with the additional of a suitable cap any exposure and potential for harm would be mitigated. No risk has been identified for a commercial end use. In relation to groundwater and controlled waters the report concludes that there is a low risk of harm and no additional remedial measures are required. As such, with the implementation of recommended mitigation measures comprising the additional of a suitable cap and soil gas monitoring in areas of residential development significant effects related to ground conditions are not considered to be likely. Notwithstanding the above, the application will be supported by a Ground Conditions Assessment informed by further intrusive site investigations based upon the uses and layout of the proposed development. This will ensure that the proposed development responds to and effectively mitigates any contamination risk.
Health and Safety	The site is not located within or near any sites identified in zones for the Health and Safety Executive (HSE), and therefore no significant effects are anticipated. As set out in relation to construction practices and waste, during the construction phase of the proposed development, all legislative requirements will be met. As such, construction practices will be suitably managed in accordance with best practice and/or existing management systems, to avoid impacts upon health and wellbeing.
Built Heritage	A Heritage Impact Assessment has been undertaken in relation to the site and proposed development. The assessment has identified all designated and non-designated heritage assets within the boundaries of the site and those whose setting and significance have the potential to be affected by the development proposals.

Topic	Analysis
	There are no designated heritage assets within the development site. The nearest designated heritage asset is the Richmond Road Conservation Area, which lies to the south west of the site and separated from it by a railway cutting, Other designated heritage assets within the vicinity of the site include Parsonage Farmhouse (ID1353940), located approximately 470m to the north east, the Grammar School (College of Richard Collyer) to the south west and a signal box to the south east. These designated heritage assets are all Grade II Listed Buildings. The site makes a very minor contribution to the setting and significance of the Richmond Road Conservation Area and makes a neutral contribution to the setting and significance of the other identified designated heritage assets. The proposals will have a negligible impact on the setting and significance of these heritage assets. Within the site, the existing principal building is included on Horsham District Council's the Horsham Town Local List (February 2011). There is also a pair of gate lodges at the western entrance to the site which are contemporary with the principal building. The proposals retain the principal building and propose the replacement of the lodges with new buildings of an appropriate design. The overall impact of the proposals upon the significance of the non-designated heritage asset will be neutral. No significant effects are predicted in relation to the proposed development.
Microclimate	Ground surface friction results in wind speed generally increasing with height. As such, impacts arising as a result of wind are typically reserved for tall buildings that exceed 11 storeys in height, through windward vortexes in which the wind blows perpendicular to the building and is diverted down towards ground level. The proposed development does not include any buildings over five storeys. Therefore, significant effects related to microclimate are considered to be unlikely.
Noise & Vibration	Machinery used during construction can generate new sources of noise, as well as construction traffic movements. Construction noise impacts will be likely to be insignificant if appropriate mitigation is undertaken. Through the implementation of standard best practice measures, noise and vibration impacts during the construction period will be suitably controlled and would in any event be temporary in nature. It is anticipated that these mitigation measures to control construction noise and vibration, would be secured via a standard planning condition requiring the preparation of a Construction Environmental Management Plan. Whilst the construction works may generate some adverse effects, the size of the proposed development and the implementation of standard mitigation, means that effects are not anticipated to be significant. Mitigation measures may include: • Careful selection of working methods and programme. • Where applicable, selection of quietest working equipment available. • Where practicable, positioning equipment behind physical barriers, i.e. existing features, hoarding, etc. • Ensuring that regularly maintained and appropriately silenced equipment is used

Topic	Analysis
	• Handling all materials in a manner which minimises noise, such as minimising drop heights. • Stationary plant, such as crushers, should be screened or located as far as possible from identified receptors as far as practicable. An environmental noise and vibration assessment has been undertaken to inform the development of a masterplan for the site. Noise and vibration measurements have been taken to inform the preparation of an acoustic model of the noise and vibration levels affecting the site during the day and at night. The assessment identified that noise from the trading estate, railway line and rail crossing on the east site boundary would potentially result in noise impacts on nearby residential receptors. As such, the assessment has recommended that retail and commercial premises are located on the east boundary of the site so that there is a low risk of noise impact to future residents. On the basis that residential development is not proposed adjacent to the east boundary, the assessment concluded in relation to the remainder of the site that suitable internal residential noise levels would be achieved through the use of double glazing and appropriate ventilation that could be secured via a suitably worded planning condition. The assessment determined that vibration levels associated with the adjacent railway lines correspond to a low probability of adverse comment. The masterplan for the proposed development will be designed in accordance with the recommendations from the Noise and Vibration Assessment to ensure that unacceptable noise impacts do not occur. The proposed uses are not considered to be inherently noisy. Some noise may be generated from the operation of mechanical plant and building services, but plant noise emissions will adhere to British Standards. As such, no significant residual effects are anticipated. Based upon initial assessments of the proposed development there will be an increase in operational vehicle trips (see Transport and Access section). Whilst these trips will result in an increase in vehicle related noise emissions, taking into account the site's location and the baseline noise environment this increase is not likely to result in significant noise related effects. A Noise Impact Assessment will be submitted with the planning application and through a suitably designed masterplan and adoption of mitigation measures, no significant noise related effects are predicted to result from the proposed development.
Socio-economics	The planning application consultation process will assess in detail those services and facilities that may be impacted from the increase in population (associated with both residential and commercial uses) and the effect, if any, will be mitigated through appropriate planning obligations in line with Regulation 122 of the Community Infrastructure Levy Regulations and Circular 05/05, so that no significant effects occur. In addition, the proposed development will be liable to a CIL charge. Savills consider that the proposed development will deliver the following socio-economic benefits:

Topic	Analysis
	• Delivery of new affordable and market homes to contribute to meeting locally identified housing needs; • Creation of employment opportunities both during the construction phase of development and in the longer term within the proposed areas of commercial development; • Increased expenditure in the local economy both during the construction phase and by residents and commercial occupiers of the proposed development; • The creation of a safe, secure and vibrant local community through well designed frontage and legible routes and spaces; • CIL payments towards the expansion and improvement of local community infrastructure including education, health and recreational faciltiies. *Education* The proposed development includes the provision of up to 300 residential dwellings, which will generate a new child yield. These children will require access to education facilities (both primary and secondary). Based upon a review of local school capacity using data provided on the Gov.uk website there is existing capacity in local primary and secondary schools, including North Heath Community Primary School, Littlehaven Infant School, Northolmes Junior School, Greenway Academy, The Forest School and Farlington School, to meet the education needs of the proposed development. As such, with existing capacity in local schools combined with CIL payments towards education infrastructure, no significant effects are anticipated in relation to education. *Health* The new population will receive access to health facilities. Local GP practices such as The Courtyard Surgery on London Road and Park Surgery on Albion Way (0.7km from the site) have existing capacity to meet the needs of the proposed development. As such, no significant effects are anticipated in relation to health provision. *Private and Communal Amenity Space* The proposed development will be designed to provide sufficient private and communal amenity space on-site for the new population. As such, no significant effects are anticipated in regard to private and communal amenity space. *Public Realm* The proposed development will be designed to include a sufficient provision of public realm. As such, no significant effects are anticipated in regard to public realm. Taking into account the nature and size of the proposed development, significant effects related to socio-economics are considered to be unlikely.

Topic	Analysis
Townscape and Visual Impact	The site is previously developed land in an urban location. The proposed development is for buildings of a similar scale and nature to those that have previously existed on the site. The local area is made up of a variety of land uses and character of development. The adjoining residential area located to the north-west of the site (via Wimblehurst Road) is a post-war housing area of two and three storey development. North along Parsonage Road is also a former Novartis site and is currently being developed by Linden Homes for housing and flats up to three storeys in height. To the west of the site is the Richmond Road Conservation Area, characterised by detached red brick Victorian and Edwardian villas with large mature gardens and trees. The majority of trees on and surrounding the site will be retained and additional planting added. The proposed development will be suitably designed with a responsive use of scale to reflect the local townscape. As such, no significant townscape or visual effects are anticipated.
Transport and Access	The development site is considered to be in a sustainable location within reasonable walking distance, and good cycling distance of numerous local employment, education and retail facilities. Its location within the surrounding highway network and accessibility to public transport (local buses, and Horsham train station) will further encourage journeys to be undertaken by sustainable modes rather than by car. The proposed vehicular accesses to the site are from Wimblehurst Road and Parsonage Road. It is intended that Wimblehurst Road will provide access to the residential elements of the development, and Parsonage Road will provide access to the employment and retail elements. Pedestrian and cycle movements will be supported between both areas. An emergency vehicular route will also be provided to connect the two areas. The format of the site access points and the internal road network will be designed in accordance with relevant guidelines and standards set out in Manual for Streets (version 2) and Design Manual for Road and Bridges (DMRB) – where appropriate). A continuous footpath with street lighting is present on both sides of both carriageways in the vicinity of the site, except for a small section on the northern side (opposite the site) of Parsonage Road, on the approach to the roundabout. The development is situated within a 20 minute walk/6 minute cycle of the town centre (taken as Swan Walk) and provides direct access to the town's employment and retail areas. Horsham train station is reached within a 15 minute walk/4 minute cycle where there are 253 cycle spaces covered by CCTV. The topography of Horsham is generally flat which will further encourage journeys by cycle. The nearest bus stops are located on Wimblehurst Road within 150m of the site entrance. Bus services run to the rail station, the town centre, Haywards Heath, Gatwick Airport and local schools and colleges. Whilst most of the services are hourly, in combination, they provide a good frequency of service to local destinations. Initial assessments of the proposed development indicate that there will be an additional (over the extant permission) 220 two way vehicle movements in the AM peak period (0800-0900) and 206 two way vehicle movements in the PM peak period (1700-1800). These movements will be assigned to the two junctions, and the local highway network according to a trip distribution based on 2011 Census data. Further detail will be provided as part of a Transport Assessment to be submitted as part of the planning application. A

Topic	Analysis
	scoping report to agree the content of the Transport Assessment has been discussed with, and sent to West Sussex County Council, as the Highway Authority, for agreement. The applicant is expecting to provide necessary infrastructure to mitigate the impact of this additional traffic, if required. The forecast level of traffic generated by the development is considered unlikely, in EIA terms, to result in significant effects related to transport.
Cumulative Assessment	As set out above, significant effects are unlikely to occur as a result of the proposed development when considered in isolation. Consideration has also been given to whether significant effects are likely to occur as a result of the combination of the proposed development with other nearby existing or approved developments, including the Former Council Offices on North Street (DC/16/2812), St Marks Court on Chart Way (DC/17/0684), Novartis Pharmaceuticals on Parsonage Road (DC/14/1624) and Winterton Court (DC/16/2937). The identified schemes have been assessed in terms of the potential environmental effects to occur prior to consent being granted. In each case it was concluded that significant environmental effects were unlikely to result from the development proposed. Therefore, taking into account the nature of the proposed development and the identified nearby schemes, the above consideration of potential environmental effects and the implementation of suitable mitigation measures, no significant cumulative effects are considered likely to as a result of the proposed development in combination with other existing or approved developments. The potential for significant accumulative effects caused by the combination of a number of impacts on a particular receptor (taking into consideration impacts at both the construction and operational phases), which acting together may cause a more significant impact collectively than individually, has also been considered. Based upon the considerations presented above and with the implementation of standard mitigation measures, significant accumulative effects related to the overall combined impacts of the proposed development are considered to be unlikely during either the construction or occupation phases.

Conclusions
As set out within this letter, with the implementation of suitable mitigation, such as best practice methods controlled via a CEMP, it is considered that significant environmental effects are unlikely to arise as a result of the proposed development. Therefore, it is considered that the proposals, as outlined, do not constitute EIA Development for the purposes of the EIA Regulations. We request that, in accordance with the EIA Regulations, Horsham District Council confirms that it shares this view and provides a formal EIA Screening Opinion within the requisite 3 weeks. It should be noted that the planning application in respect of the proposed development will nevertheless be accompanied by a series of technical reports, the full suite of which will be agreed with Horsham District Council. At present, the planning application submission is anticipated to include: • Affordable housing statement

Conclusions
• Design and Access Statement • Flood Risk Assessment and Drainage Strategy • Ecology Phase 1 plus extended surveys • Tree Survey • Contamination Report • Heritage Statement • Archaeology DBA • Structural Report • Transport Statement and Travel Plan • Statement of Community Involvement • Noise and Vibrations Report • Air Quality Assessment

Please do not hesitate to contact me should you require additional information prior to forming the Screening Opinion within the prescribed three week period.

Yours sincerely



Charles McClea
Savills Planning and EIA

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