Horsham District Council Screening Assessment

Ref: EIA/24/0007

Site: Former Novartis Site, Wimblehurst Road, Horsham

Development Proposal: Development of the whole of the Novartis Site for approximately 455 dwellings, comprising the following:

Phases 1 and 2:
Residential development comprising approximately 211 dwellings, including the conversion of 'Building 3' and the demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.

Phase 3:
Residential development comprising approximately 244 dwellings. Vehicular access taken from Parsonage Road. Car and cycle parking, landscaping and open space and associated works.

EIA Regulations	
Is the proposed development listed in Schedule 1?	No
Is the proposed development listed in Schedule 2?	Yes – Item 10b (urban development project with more than 150 dwellings and the overall development area exceeds 5 hectares)
Is the proposed development in a sensitive area as defined in Regulation 2? (SSSI, National Park, property on World Heritage List, Scheduled Ancient Monuments, AONB, SPA or SAC)	No (boundary of High Weald AONB located to the east – approximately 1.1km divided by built up area of Horsham)

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)	The application site covers approximately 8 hectares. The application is for the redevelopment of the site to provide approximately 455 residential units and includes the conversion of existing Building 3 to provide flats. The proposal utilises the existing accesses off Wimblehurst Road and Parsonage Road. Building 36 is to be demolished.	Low

	This brownfield site is separated from the existing houses and development to the south and east boundaries by the railway line. Existing roads also separate the site from existing development to the north and west boundaries. It is considered that whilst a large development, given its location, the size and scale of the development will not have a significant impact. This is subject to measures to limit the impact of the construction works.	
b) cumulation with other existing or approved development	The site is located within the existing defined built up area of Horsham town, and adjoins the permitted residential development of 160 dwellings (DC/14/1624) to the north (now complete). Additional residential development has taken place within the town through conversions / redevelopment, but the most significant development that is ongoing is the development to the west of Horsham (DC/09/2138 and DC/09/2101). Permission has also been granted for the development of land North of Horsham (DC/16/1677) for up to 2,750 homes with a business park and neighbourhood centre. This is now well underway but is significant distance from the Novartis site to the north.	
c) the use of natural resources, in particular soil, water and biodiversity (e.g. land, water, materials, energy – non renewable or in short supply?)	The construction process will require the use of resources such as energy, building materials, land and water. Once operational the development will also require the use of resources such as energy and water. The level of resources used will depend on the efficiency levels by which the buildings and residential blocks are constructed. No specific indication of the level of sustainability of the development is provided at this stage, but would need to meet building control standards, which will as a minimum result in reasonable levels of energy efficiency. The site is not on greenfield land. Land contamination remediation measures will be required as part of an application. These details could be approved as part of an application and conditioned to be implemented accordingly to ensure the amenity of future residents. Development within the Sussex North Water Resource Zone is subject to water neutrality restrictions as a result of biodiversity impacts. The proposed development is within the zone, with potential impacts to Arun Valley Special Area of Conservation, Special Protection Area and Ramsar site. The	Low

	submitted screening states that applications will be supported by Water Neutrality Statements to address this impact.	
d) the production of waste (demolition, construction, operation and decommissioning?)	The proposed site is brownfield land. There are some areas of hard standing and a number of buildings have already been demolished. The proposal includes the demolition of Building 36 which result in large amounts of waste. Any application would need tom outline how this would be efficiently and sustainably dealt with. The operational phases of the development will require refuse to be collected from the residential properties onsite.	Low
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)	The construction phases of development could generate noise, dust and vibration issues for residents in the surrounding area however, these impacts would be temporary whilst construction takes place. These impacts could be mitigated through the submission of Construction Environmental Management Plan to be considered as part of an application. Traffic generated by the development during the operational phase could have an impact on noise and air quality – it should however be noted that the previous use of this site as an employment centre also generated traffic movements and the impact of this change is therefore lower than a greenfield site. Measures could also be required to mitigate the air quality impact.	Low - Medium
f) the risk of major accidents and/or disasters including those caused by climate change, in accordance with scientific knowledge	The risk of accidents associated with this development is considered to be low	Low
g) The risks to human health (eg due to water contamination or air pollution)	The risks to human health associated with this development is considered to be low	Low

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	The site is located within the existing defined built up area of Horsham town, and is nearby to residential development. The site has an urban	Low
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?)	character which (before demolition) was dominated by large office and light industrial architecture. The site is now largely cleared. It is surrounded by two major railway lines, the Jubilee and Nightingale Industrial estates and the College of Richard Collyer playing fields. The nearest residential properties to the proposed development are located to the north on Parsonage Road in the new development at Oaklands.	
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)	The site is located in Flood Zone 1 which indicates a low probability (less than 0.1%) of flooding. There is however potential for development to impact on local drainage patterns. It is noted that a therefore a site specific Flood Risk Assessment would be submitted as part of any planning application. Environment Agency maps indicate that there are isolated areas of medium and high surface water flood risk within this site, broadly aligning with the foundations of the former buildings on the site.	Low
ii) coastal zones and marine environments (any potential for the scheme to impact on coastal areas e.g. runoff etc)	N/a	None
iii) mountain and forest areas (impacts on wooded areas, including any designated areas of ancient woodland / TPOs).	There are no wooded areas onsite. The proposed site does include TPOs. The proposal includes the removal of these trees, some of which are still healthy. A full justification for the removal of these trees would be required for any application.	Moderate
iv) nature reserves and parks (e.g. any impacts on designated nature conservation sites / other areas of nature conservation importance?)	There are no designated nature reserves or parks adjoining the site and the site is not located within an environmentally sensitive area as defined by the EIA Regulations. The site is not located within a conservation area nor are there any listed buildings onsite. The Horsham (Richmond Road) Conservation Area is however located immediately to the south west of the site abutting the railway line and the original Ciba office is identified as a locally important historic building. The proposal indicates the retention of this building.	Low
v) European sites and other areas classified or protected under national legislation (this therefore includes areas designated	The application site does not constitute a 'sensitive area' as defined by the EIA Regulations. The closest SPA to the site is the Arun Valley and	Low

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?)	the nearest SAC is the Mens Woodland in Chichester District, however development in this location is not considered to adversely impact these sites – mitigation measures are set out in the HDPF to ensure that development does not directly or directly affect the integrity of these sites. Any development will need to accord with these policy provisions.	
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 these is such a failure (any areas already subject to pollution or damage – include impact on any AQMAs).	The applicant states that a Preliminary Ecological Appraisal has been undertaken in July 2018. This would need to be updated for any application as it would now be considered out of date. Due to the presence of suitable habitats for bats and reptiles, further protected species surveys are underway. Depending on the results of the surveys, the applicant has stated that appropriate mitigation and biodiversity enhancements will to be provided on site. Any application would also need to consider the impact of a proposal on peregrine falcons on the site. It's been reported to HDC that falcons are on the site. These birds are given full protection under the Wildlife Act 1981.	Low – moderate
vii) densely populated areas (size of population affected, changes to demography, lifestyles, employment etc)	The population of Horsham town is over 55,000. The proposed development will increase the population of Horsham through the introduction of dwellings and employment uses to the town. The site is close to the centre of Horsham and is well located to reach employment, leisure and retail facilities, which may help reduce additional car journeys. The site is also relatively close to Horsham and Littlehaven railway stations. The scale of development is relatively low compared with the existing scale of the town and most residents would not be directly impacted by this proposal. Impacts on infrastructure and services (such as education facilities and health provision) would need to fully assessed under an application.	Low-moderate
viii) landscapes of historical, cultural or archaeological significance	The site is not designated as being of particular landscape importance in that it is not designated AONB or National Park. There is a building of local importance located within the site, which is indicated to be retained and converted. The High Weald AONB is located to the east of the site separated by urban sprawl. Given the distance from the AONB, the setting AONB would not be affected by this development. The site will remain in urban use. It is noted that the applicant has	Low

	stated that a Heritage Impact Assessment has been undertaken. This will take into account the impact of the proposal on the locally listed building and adjacent heritage assets including Horsham (Richmond Road) Conservation Area to the south west.	
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:**	**Description**	**Significance**
a) the magnitude and spatial extent of the impact (geographical area and size of the affected population)	The proposed development is for buildings of a similar scale and nature to those that have been previously existed on the site. The local area has a variety of land uses and character of development. The adjoining residential area to the north west (via Wimblehurst Road) is a post-war housing area of two and three storey development. North along Parsonage Road is a site, which was also part of Novartis, which has been developed for housing. To the west is the Horsham (Richmond Road) Conservation Area, characterised by detached red brick Victorian and Edwardian villas.	Low – moderate.
b) the nature of the impact	Overall this is a relatively small scheme when considered in the context of the size of Horsham town as a whole. The site was already in urban use, and has relatively few environmental constraints. Additionally, the site is well screened to the southern and eastern boundaries with the railway. They key impacts from an environmental perspective are likely to be construction impacts such as noise, and those on the landscape / townscape of the site. There will also be a cumulative impact in terms traffic generated by the construction phase and the development itself.	Low – the impact is mainly localised
c) the transboundary nature of the impact (any international impacts?)	N/a	None
d) the intensity and complexity of the impact (e.g. overall size, scale, combination of impacts)	The potential impacts arise from the combination of impacts in conjunction with development in the area (as outlined above)	Moderate
e) the probability of the impact (e.g. overall probability of impacts identified above)	The construction impacts such as noise is likely but could be mitigated through the agreement of a Construction Environmental Management Plan. The hours of construction could also be limited to daytime hours.	Moderate

f) the expected onset, duration, frequency and reversibility of the impact (demolition, construction, operation and decommissioning)	The impacts from the construction phase would be temporary. The impact of noise and disruption from traffic to and from the site would be regular. Given the proposed uses there could be regular noise impacts from the operational phase. Traffic impacts are likely to be regular particularly when combined with neighbouring uses.	Moderate
g) the cumulation of the impact with the impact of other existing and/or approved development	The potential impacts arise from the combination of impacts in conjunction with development in the area, including the development to the north.	Moderate
h) the possibility of effectively reducing the impact	There is potential for the impact of this proposal to be reduced through a number of means. This includes environmental / construction controls during the construction phase, together with measures to control the hours of operation / lighting etc.	Low to Moderate

Results of any relevant EU environmental assessment that is reasonably available	An assessment was made in the Strategic Environmental Assessment (SEA) of the Horsham District Planning Framework and the Habitats Regulation Assessment of the same document. In the SEA, the Novartis site is identified as a site with 'limited impact on biodiversity.' The HRA also sets out mitigation measures that are necessary for all development to accord with to prevent direct and indirect impacts on protected sites.	Low

Conclusion

EIA Required?	No
Statement of reasons	The proposed development does not adjoin any nature conservation or landscape designations. Whilst it is considered that there are likely to be impacts which arise from the development, particularly those on the construction phase, land contamination, transport and potentially ecology, these are not so significant that they need to be dealt with outside from the normal planning application process. On balance, it is considered that the overall scale and nature of the impacts that would arise from the scheme do not have such significant effects as to require an EIA, and that the environmental issues arising from the development can be dealt with as part of the usual planning application process.
Date	7th January 2025