Horsham District Council Screening Assessment

HDC Reference: EIA/24/0002
Site: Land East of Shipley Road, Southwater, West Sussex RH13 9QB

Development Proposal: Battery Energy Storage project on land to the east of Shipley Road

EIA Regulations	
Is the proposed development listed in Schedule 1?	***No***
Is the proposed development listed in Schedule 2? (Note 'wide of scope, broad of purpose' legal judgement)	**Yes** – Item 3 (a) industrial installations for the production of electricity, steam and hot water. It is noted that the site is reported as being 17.3ha (section E of supporting statement) and 12.5ha (in section F of supporting statement), either way the site exceeds the 0.5ha threshold as set within the 2017 EIA Regulations. This means the proposal could constitute Schedule 2 development subject to the selection criteria as identified in Schedule 3 of the Regulations. The proposals are for *'the proposed construction, operation and maintenance of a Battery Energy Storage System (BESS) with associated infrastructure and works including highway access, landscaping an biodiversity enhancements'*.
Is the proposed development in a sensitive area as defined in Regulation 2? (SSSI, National Park, property on World Heritage List, Scheduled monuments, AONB, SPA or SAC)	**No**

Schedule 3 EIA Regs 2017 – 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 site is located in Knepp Wildland (described as an area of low intensity farming and rewilding in the West Sussex Low Weald). There is an anomaly in the reporting of the site measurements which are stated as being approximately 17.3ha (section E of supporting statement) and 12.5ha (section F of supporting statement). This will need to be clarified in any forthcoming application submission. The site accessed from Shipley Rood (Class C) which is off of West Chiltington Lane (A272 – Class A). The site is currently used for regenerative livestock grazing and has interrupted tree lined field boundaries. Knepp mill stream runs across the northern edge of the site before slowing southwards into the River Adur 2.3km to the south. There are existing electricity pylons which run east to west across the site. There is a small ridge that runs east / to west through the northern part of the site (24m AOD) reducing to18m AOD across the rest of the site. The site is located in a relatively flat part of the Low Weald with the lowest part being along the stream at the northern / eastern edges of the site. The Clearstone Energy Statement submitted as part of the EIA assessment advises that the proposals seek design flexibility as part of the application proposals based on the Rochdale Envelope approach which they would seek to be controlled through imposition of planning conditions requiring prior approval thereafter. The Rochdale Approach is based on defining Development Zones rather than having a definitive layout, with identified zones identifying areas within the site where infrastructure would be located, whilst allowing flexibility in terms of design layout of batteries and substation within each zone. The proposals seek to use Battery Energy Storage Systems (BESS) with technology that helps facilitate decarbonisation by storing excess energy on a power system when supply outstrips demand and using it at a later stage when demand outstrips supply. It is noted that the from the supporting information that the installation of the BESS equipment seeks to achieve the statutory target of making the UK carbon net zero by 2050 and to tackling global warming / climate change.	No significant and/or residual environmental impacts anticipated in EIA terms Imposition of appropriate conditions may be required to control and mitigate against any impacts. arising from the development. Further details required with application: Landscape and Visual Impact Assessment; Preliminary Ecological Appraisal (PEA); Ecological Impact Assessment Heritage Statement; Arboricultural-Impact-Assessment Transport Assessment. Archeological Assessment Thermal Runway Details Flood Risk Assessment Drainage Strategy Details of site layout, elevations and functions of the proposed site along with details and heights and

	It is noted from supporting information that the worst-case design parameters would be adopted as part of the environmental impact assessment of the proposed development and that key components would include the following: • Battery racks /skids & Inverter units and transformers - no higher than 3m AOD located based on cem free concrete / and or recycled steel, with gravel between the racks (location not given at this stage); • Substation / switchgear compound (gravel and compound footings) - no higher than 14m AOD. • Security fencing; gates and CCTV /Infrared – no higher than 2.5m AOD Internal access roads (rolled aggregate, secondary aggregate where possible). • Two separate vehicle access points from Shipley Lane, one across forming the main construction and operational access and the other a secondary access for fire fighting vehicles (safety precaution); • Surface Water Drainage provisions (SuDS) Drainage; • Earthworks to create flat platforms for the electrical infrastructure; and • Planting for screening, landscape character and wildlife mitigation and enhancement, including the mandatory 10% biodiversity net gain. Tree root protection zones are proposed to ensure protection of mature trees on site. It is noted that approx.30% (5ha) of the site would contain electrical and access infrastructure, with 66% (11 ha) containing landscape, wildlife habitat and species enhancements to ensure effective visual screening, landscape treatment, site drainage and biodiversity net gain. The Clearstone Energy Statement advises that a site layout plan would be provided for information as well as indicative elevations of the proposed infrastructure, and	details of perimeter fencing, CCTV poles; gates; types and finishes of circulation rotes and parking areas within the site;

	that development would not be allowed to exceed the parameters as advised if approved. Underground cables would connect the BESS to overhead lines between existing pylons located within the site boundaries (providing the point of connection POC). It is advised that 2 HGV would travel to the site per day and would access the site via the existing agricultural access (to be improved and made fit for purpose) on Shipley Lane. Construction activities and deliveries would be carried out Monday – Friday 08:00-18:00 and between 08:00 and 13:30 on Saturdays. No construction activities or deliveries would occur on Sunday or Public Holidays. It is noted that construction of the proposed development would take place over a period of approx. 15 months. Full planning is sought for 40 years after which time all consented electrical infrastructure would be removed, and the site restored to its original use as agriculture.	
b) **accumulation with other existing or approved development**	The site lies outside of the Built-up Area Boundary settlement and is therefore located within the countryside. There is no similar development taking place near or adjacent to the site. Any cumulative impacts of the proposed development on this site should consider the effects of both construction and operational phases of the development which together may have a greater impact than those considered separately for each development. It is considered that with the implementation of standard best practice mitigation measures significant cumulative effects of potential related and combined impacts are considered to be unlikely during either the construction or operational phases of the development. Supporting evidence will need to be submitted with the development proposals and provide a thorough assessment of the likely impacts and mitigation measures that would be proposed to overcome any potential adverse or appreciable impacts on visual or private amenities.	No significant and/or residual environmental impacts anticipated Further details required with application: Landscape and Visual Impact Assessment

	A Landscape and Visual Impact Assessment which considers cumulative impact must be with any forthcoming application.	
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 development will require the use of resources such as land, energy, materials for construction and operational phases of the proposals, along with road surfacing and hard and soft landscaping. The Council can require the applicant to include measures in the CEMP to minimise the consumption of natural resources. Necessary works relating to the proposals would likely result in impacts on biodiversity within the site boundaries arising from the land engineering works required for the concrete / steel bases relating to the siting of the proposed infrastructure; creation of access routes; and underground routing of cables. No other works to the topography of the land have been identified. The Councils in-house Ecologist has reviewed the submitted EIA details. It is advised that the Applicant should base their environmental assessment of the proposals by adopting a '*worst case scenario and maximum design parameters approach, to ensure all potential significant effects are covered'*. A combined LHMMP (LEMP and HMMP) would be acceptable '*so long as creation and management of habitats proposed to meet the biodiversity net gain requirement describes how the Applicant intends to reach the target condition of those habitats, as per the statutory biodiversity metric and condition assessment sheet criteria (both of which are a requirement for validation). The LHMMP must also span over a 30-year period, and the target conditions must be met by this time. As this is being presented in a combined document, we will also request a draft of this at validation as per the requirement for a HMMP on HDC's local list'.* The Councils Ecologist has advised that 'g*iven the BNG is proposed on-site and is likely to meet the definitions of 'Significant on-site BNG' as per government guidance, it is highly likely that BNG proposals will be secured via a legal agreement, with HDC undertaking monitoring of the delivery over the 30-year period. Please note that, the whole site falls within the Knepp Estate with Fluvial*	No significant and/or residual environmental impacts anticipated. Further details required with application: CEMP LHMMP (LEMP and HMMP) Site Waste Management Plan. Mineral Resource Assessment Water Neutrality Statement

	Extensions Biodiversity Opportunity Area as depicted in the HDC Green Infrastructure Strategy (2024), and therefore the BAP habitats listed under this designation (i.e., lowland meadow, reedbed, wood-pasture and parkland, and woodland) will need to be entered as 'Formally identified in local strategy' in the metric'. *'With regards to the Development Zone Plan, it is important to note that a minimum 15m buffer zone *must* be implemented for ancient woodland as per government guidance, or 15 times larger than the diameter of any ancient / veteran trees or 5m from the edge of the tree's canopy (whichever is larger), to mitigate any adverse effects. The buffer zones should not contain SuDS. The Applicant should communicate the estimated level of impact, access, and disturbance to the Site, to determine whether any vegetation proposed within the buffer zones can constitute towards the biodiversity net gain calculations. If vegetation is necessary to mitigate impacts on ancient woodland, then this can only count towards no net loss (0% in metric terms), and not the additional 10% net gain (or 12% in the emerging Local Plan).'* The EIA submission states that an Ecological Impact Assessment will be submitted as part of a full application. It should be noted that the site falls within the wider conservation area/12km of the Sussex Bat SACs Bat Sustenance Zone. *'Further information re the construction phase is needed to determine potential impacts on protected species, and potential mitigation measures'.* It is noted from the Clearstone Energy Statement that the Agricultural Land Classification survey undertaken at the site, advises that the quality of the Agricultural land is defined as being Grade 3b (not best and most versatile agricultural land) and that the soils across and surrounding the Site are characterised as loamy and clayey, with moderate fertility and impeded drainage (Cranfield Soil and Agrifood Institute – Soilscapes Map 2023). Further details of this will be required as part of any application to evidence of the exact land quality and designation and to address the distinction between Grade 3a and 3b,	

	recognising the importance placed on the retention of the most versatile agricultural land (Grade 3a and above). Full planning is sought for 40 years after which time all consented electrical infrastructure would be removed, and the site restored to its original use as agriculture. Given the limited depth of the proposed foundations of bases for the BESS, it is not anticipated that there would be any long-term mineral sterilisation to below-ground deposits of brick clay. Once operational the development will require the use of resources such as energy and water, however these should not be significant in nature and would not result in the use of resources which are considered to be in short supply. The Natural England Position Statement dated 14 September 2021 may be relevant to this site in the event that the facility utilises water as part of any cooling process / fire safety purposes etc.	
d) **the production of waste** (demolition, construction, operation and decommissioning?)	The site is located within the countryside and is a green field site, there is no built form requiring demolition. Waste materials (spoil) would be generated as a result of below ground and above ground land works during the construction process. Construction waste would be managed in accordance with all applicable legislation and disposed of in line with best practice. Operational waste would be disposed of in line with HDC requirements and managed in accordance with all applicable legislation. The applicant is encouraged to ensure that construction waste is reused and recycled where possible. Measures should be put in place to reduce the amount of packaging sent to landfill.	No significant and/or residual environmental impacts anticipated. Further details required with application: A Site Waste Management Plan
e) **pollution and nuisances** (e.g. potential for noise, dust, vibration, light, odours, production of	The site is located within the countryside (green field site) and the nearest residential dwelling 'Old Keepers Cottage' is approximately 150m east of the site. 'Cuckoo Barn' is located 250m south of the site and 'Gossland Farm' Caravan and Camping site is located 385m north of the site. There are no designated heritage assets within or adjacent to the site, however, there is a Grade II Registered Park	No significant and/or residual environmental impacts anticipated.

substances / emissions which may damage environment - construction, operation and decommissioning	and Garden ('Knepp Castle,' located 375m south of the site, as well as six Grade II Listed Buildings, including post medieval rural dwellings located approx. 435-975m from the site within the surrounding farmland. There are no designated ecological assets within the site. There is Ancient woodland adjacent to three boundaries of the site. The site is not located within an identified Air Quality Management Area (AQMA), the nearest AQMA being Cowfold (6Km east of the site). The Councils Air Quality Officer has advised that 'During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan should be submitted for approval. The plan should include a statement of proposals to minimise dust emissions in accordance with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction.' The Councils Air Quality Officer has advised that '*given the anticipated construction traffic is expected to be 2 HGVs plus the traffic generated by 20 workers traveling to site per day; and that during operation only maintenance vehicles once every couple weeks will attend the site, the proposed development is considered unlikely to have an impact on local air quality…'.* The construction phases of development (anticipated as being 15 months). It is not clear from the information submitted, what measures will be taken to reduce these impacts, however, any impact would be local to the site and its immediate locality. Any impacts would be short-term and temporary and could be controlled through imposition of a suitable condition requiring the submission and implementation of a Construction Environment Management Plan (CEMP) providing for noise and dust suppression measures, and a plan to identify the access route. Supporting information submitted with the EIA states that traffic movements associated with the running of the site would be low, and would just be in relation	Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, noting the 15-month implementation timeframe for the BESS. Further details required with application: Noise Report, Transport Assessment, Environmental Risk Assessments Phase 1 (desktop study) Phase 2 (Intrusive Investigation) contaminated land reports, Construction Environment Management Plan, Air and dust pollution Assessment, Noise and Vibration Assessment Flood Risk Assessment and Drainage Strategy Thermal Runway Details

	to maintenance visits, however, full details should be addressed and submitted with any planning application. Information submitted with the EIA application states that initial noise assessments have been carried and that the noise impacts of the proposed development would be of 'low impact' in BS4142 terms and as such are not considered to be significant. However, a full noise assessment should be submitted with any future planning application for full assessment. Some minor adverse impacts on habitat are likely as a result of the proposals during the construction phase, however, these could be minimised through sensitive master-planning and long-term biodiversity enhancements. It is noted that no lighting or lighting assessment is proposed as part of the proposed development. This should be made clear with justification in any future application submission. A biodiversity CEMP, to be agreed with HDC and secured through a suitable planning condition, should be submitted in support of the planning application. The site is located within Flood Zone 1, 2 and 3. The majority of the site is within Flood Zone 1 (low risk) as confirmed by the Environment Agency flood zone mapping information. The proposed infrastructure would be located within the area identified within Flood Zone 1 which is at low risk of flooding from rivers or sea, now and over the lifetime of the development. Areas of site within Flood Zones 2 and 3 (medium and high-risk areas respectively) are located along the sites northern and eastern boundaries. Supporting information advises that no electrical infrastructure would be located within Flood Zones 2 and 3. Flood Zones 2 and 3 would contain the primarily planting and wildlife benefits. The effects in relation to surface water and hydrology, given the nature of the proposal, are unlikely to be significant.	

f) **the risk of major accidents, and/or disasters** (including those caused by climate change)	It is not considered that the site is within an area where natural disasters are likely to occur including those arising from climate change. Proposed infrastructure relating to the development would be located within Flood Zone 1 (low risk area) and adjacent to Flood Zone 2 and 3 (greater risk areas), development would increase the level of impermeable areas on the site which without mitigation measures would result in an increase of surface water flooding. The scheme should adopt sustainable drainage techniques to mitigate against such concerns. A Drainage Strategy should be submitted with any future planning application. During the construction phase, the contractor(s) would implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that would have effects on people or the environment. The proposed development should be designed in accordance with recognised and accepted best practice in terms of highway design, specification of drainage and current building regulations, to further reduce the susceptibility of and the site to major accidents / or disasters. During the construction phase, certain materials may be present on the site which may be harmful to the environment. The effects in relation to hazardous substances and contamination are assessed by way of supporting material submitted with the planning application and conditions imposed in the event of planning being permitted. An Environmental Risk Assessment is required as part of any future application to be submitted. All such measures would form part of the CEMP. Any associated risks to human health arising from the proposal should be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. Any constructional activities would need to ensure the continued safety of users of the PRoW (which is noted as not being re-routed). WSCC Fire and Rescue service	No significant and/or residual environmental impacts anticipated. A detailed fire risk assessment and mitigation measures should be submitted for review, giving consideration to the neighbouring residential / sensitive receptor points, fragile / vulnerable habitat and access limitations in the event of emergency vehicles attending the site.

	would be consulted on the proposals to ensure fire safety is suitably considered and addressed. The likely operational risks arising from accidents at the site would be by way of cloud vapour / smoke in the event of fire, and heat / fire spread. It is expected that adequate fire protocols and separation between containers within the site are included as part of the submission documents for assessment.	
g) **The risks to human health** (e.g. due to water contamination or air pollution)	Any associated risks to human health arising from the proposal would be dealt with through the supporting planning application material ensuring that appropriate mitigation is included within the proposed development. Appropriate measures, in accordance with all relevant legislation, would be used to prevent accidental spillages of contaminants during the construction of the development. For the operational phase, an appropriate mechanism are expected to be incorporated to manage risk such as fire, ensuing vapour / smoke, spillages of contaminants etc. an appropriate drainage design to prevent contaminants entering waterbodies should be implemented as part of the development. A CEMP would be expected to set out the use of practice measures by construction contractors. The site layout for construction works should be arranged to ensure that machinery and dust causing activities are located suitably away from sensitive receptors.	No significant and/or residual environmental impacts anticipated. If recommended for approval, planning conditions and informatives would seek to limit the likely impact on the PRoW and any users thereof. Further details required with application Noise Report Transport Assessment Environmental Risk Assessments Phase 1 (desktop study) Phase 2 (Intrusive Investigation) contaminated land reports Construction Management Plan Air and dust pollution Assessment Noise and Vibration Assessment.

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 land use will change from undeveloped Grade 3b agricultural land to purposes of a battery storage facility (BESS) associated with off-site energy generation, for a period of 40 years. It is advised that electrical infrastructure / fencing would only be located within the north and west part of the site (within Flood Zone 1) covering approx. 1/3 of the identified site area. The overall site area is advised as being both 17.5ha & 12ha respectively (sections E an F of the accompanying Clearstone Energy Statement), this needs to be clarified in any future application submission. Notwithstanding this, it is noted that the entire site comprises Grade 3b Agricultural Land (not best and most versatile agricultural land). PRoW (2803) runs adjacent to areas of the Ancient Woodland and the north and east site boundaries. Overhead electricity lines are supported by existing Pylons located within the site boundaries. An existing field access gate accessed off of Shipley Road is located along the northwest boundary of the site, there are no immediate residential dwellings along this stretch of Shipley Road. It is advised that installation of the BESS would be limited to a 40-year lifespan, after which the site would be decommissioned and all infrastructure removed from the land. The land could be reverted back to its former agricultural use.	Subject to appropriate mitigation, no significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, including at decommissioning stage. Further information required with application: clarification / justification of the land quality in respect of the Grade 3 land.

b) **the relative abundance, 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?)	The site is in the countryside and is green field land. The Site does not fall within a landscape "sensitive area" as defined by the EIA Regulations. The site is identified as being within the G4: Southwater and Shipley Wooded Farmlands character area (Horsham District Landscape Character Assessment, 2003). There is irreplaceable Ancient Woodland to the northwest; northeast and southeast corners of the site. There are no sites with statutory nature conservation protection within 2km. There are three ponds within 250m of the site that would have potential for Great Crested Newt (protective species), the site is located within an identified Bat Sustenance Zone (protected species). A public ROW (2803) sits predominantly outside of the site boundaries but is located immediately adjacent to and at points just within its northern boundary. It is noted that there are no sites with statutory designations within 2km of the site and that the northern part of the site is adjacent to Horsham Common, Coates Furzefield & Constables Furze Local Wildlife sites, (LWS). Two further Local Wildlife sites are located within 2 km of the Site, 'Knepmill Pond', the 'River Adur and Lancing Brook' LWS. It is noted that this is linked hydrologically to the Site as the small stream in the east of the Site flows south to this LWS into Knepmill Pond. The third site, 'The Downs Link, Nutham Woods & Greatseeds Farm' LWS is located approximately 1.8km to the north-east. There are Ancient Woodland areas outside of the site, immediately adjacent to the corners of the site boundaries - northwest (Hartsgravel Wood), northeast (Alder Wood) and southeast (Little Cockshill Wood). Undesignated woodland is located adjacent to the southwest corner of the site (Great Cockshill Wood) The Councils Tree Officer advises that a minimum 15m buffer zone would be required between the ancient woodland and any battery storage / built form and for Ecology purposes. Thermal runway details would be required as part of any forthcoming application given the proximity of woodland / tree corridors adjacent to the proposed BESS.	Subject to appropriate mitigation, no significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development: Further information required with application Preliminary Ecological c) the absorption capacity of the natural Appraisal (PEA). Consultation with NatureSpace in relation to the High Risk potential to Great Crested Newt Habitat.

	The proposed installation of the 'BESS' facilities would result in physical changes to the green field site, including the introduction of concrete plinths, tracks, fencing and CCTV security measures as part of the future site proposals. It is noted that in respect of landscape and visual impacts preliminary fieldwork has been carried out to inform a Landscape and Visual Impact Assessment (LVIA) and Landscape and Ecological Mitigation and Management Strategy (LEMES) report which would support a future application submission. It is also noted that a preliminary ecological appraisal has been carried out and that follow up species surveys have been completed. All relevant supporting survey information should be submitted with any future planning application for a full assessment. Mitigation and enhancement measures (including minimum BNG 10%) would be required and should also be addressed. The Councils Emerging Local Plan requires a minimum of 12% BNG). Once operational, the proposed development would include new and enhanced landscaping and planting. Further details should be included in the landscape strategy which would be expected to be submitted with a future planning application. A comprehensive Tree Survey and Aboricultural Impact Assessment would be required as part of any forthcoming application given that some trees have been identified as being removed near to the access and also to ensure that Root Protection Areas of nearby trees are respected. An Ancient Woodland Buffer Zone of 15m must be achieved between Ancient Woodland and associated BESS installations. Given the size of the site, and the limited land use directly for BESS installation within the wider site area, it is considered that there should be sufficient space available to ensure no adverse harm occurs to any of the boundary vegetation, or to the RPAs of the trees within the ancient woodland block.	

	Full information is required to assess the impact on a potential Great Crested Newt, a number of reptiles, dormice and a number of other protected and notable species.	
c) **the absorption capacity of the natural environment, paying particular attention to the following areas:**		
i) **wetlands, riparian areas, river mouths** (e.g. floodplains, impacts on drainage, aquifers)	The site is mostly located in Flood Zone 1 which indicates a low probability (less than 0.1%) of flooding. A small part of the site is partially within Flood Zone 2 (east boundary), and adjacent to Flood Zones 2 and 3 (north and east boundary). There is also potential for the development to impact local drainage patterns. The Clearstone Energy Statement (with reference to Hydrology and Flood Risk) advises that the site area subject to the installation of the BESS is within Flood Zone 1, and therefore has a low risk of flooding. Areas of the site to the northern and eastern boundaries are within Flood Zones 2 and 3 and are therefore at medium and high risk of flooding. It is noted that the site has up to a high groundwater level of vulnerability risk. It is noted that Infiltration based SuDS features are not considered feasible for the site and that the drainage strategy would therefore comprises conveyance of the Site run-off to a layer of crushed granular sub-base beneath the development areas with subsequent discharge to the watercourse along the northern and eastern boundaries at a restricted rate equivalent to the Qbar Greenfield runoff rate. A Flood Risk Assessment and Drainage Strategy is a necessary requirement of any future planning application. Flood and surface water management must be	No significant and/or residual environmental impacts anticipated Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development: Further information required with application: Flood Risk Assessment Drainage Strategy

	demonstrated, and appropriate mitigation measures provided for further consideration.	
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, river mouths** (impacts on wooded areas, including any designated areas of ancient woodland / TPOs).	N/A	None
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 boundaries are lined by mature trees, however, none of these are subject to Tree Protection Orders (TPO's). To the northwest, northeast; southeast and southwest are areas of woodland, those to the northwest, northeast and southeast are designated as Ancient Woodland. A Tree Survey and Arboricultural Impact Assessment Report should be provided with any future planning application submitted in order that the implications of the proposed development on the trees / woodland within and adjacent to the site can be fully assessed. Additionally, a landscape strategy should be submitted with any future planning application.	No significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development: Further information required with application:

		Arboricultural Impact Assessment
v) **European sites and other areas classified or protected under national legislation** (this includes areas designated pursuant to Directive 79/409/EEC (conservation of wild birds) and Directive 92/43/EEC (conservation of habitats and fauna and SSSI's) (In particular the Arun valley SPA and The Mens -Barbastelle bat flightlines are a key consideration here. Any other European protected species present that can be affected?)	The application site does not constitute a 'sensitive area' as defined by the EIA Regulations. The site is located within a Bat Sustenance Zone. The site is also not within in a Scheduled Ancient Monument Designation. A Preliminary Ecological Appraisal (PEA) with a Phase 1 habitat survey and appropriate Phase 2 Surveys (Bats; GCN; hazel dormice; reptiles; water voles; badgers and breeding birds as appropriate) along with an Ecological Impact Assessment should be submitted with the planning application. Best practice ecological mitigation measures can be implemented which include tree protection measures during construction and scrub/vegetation removal outside of the bird breeding season to avoid the potential for damaging bird nests. Species surveys for other protected species including Dormice, Badgers, Breeding Birds, Reptiles, and Hedgehogs will also be required and relevant mitigation is expected to be proposed to ensure the development will avoid significant impact on protected or priority species. In relation to Great Crested Newts, the proximity of the site to a number of nearby ponds is also acknowledged and would form part of the assessment under the Councils Nature Space District Licensing Scheme. Appropriate mitigation and enhancement measures should be provided as part of any future application proposals.	Subject to mitigation (including a demonstration of water neutrality), no significant and/or residual environmental impacts anticipated. The proposal will require separate consultation with NatureSpace in relation to Great Crested Newts
vi) **areas in which the environmental quality standards**	The site is not located within an identified Air Quality Management Area (AQMA), the nearest AQMA being Cowfold (6Km east of the site).	No significant and/or residual

laid down in Community legislation have already been exceeded (any areas already subject to pollution or damage – include impact on any AQMAs).	Dust generation during the construction phase would be managed in accordance with standard best practice measures, enforced through a CEMP and is not anticipated to generate significant adverse effects. The site layout has the capacity for construction works will be arranged to ensure that machinery and dust causing activities are located as far away from sensitive receptors as possible.	environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development. Further information required with application:
vii) **densely populated areas** (size of population affected, changes to demography, lifestyles, employment etc)	The site is located within a countryside location characterised by open fields and field boundaries along with agricultural and equine related activities and sporadic residential dwellings. The Built-Up Area of Southwater lies approx. 1.6km north of the site. It is not anticipated that the nature of the proposal would result in a significant change to the lifestyle or character of people living in the wider vicinity.	No significant and/or residual environmental impacts anticipated
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. Landscape impacts are not considered to be so significant that they cannot be dealt with through the usual planning application process. Along with a Landscape Visual Impact Assessment, a Zone of Theoretical Visibility Assessment is also required.	No significant and/or residual environmental impacts anticipated.

	The site is not within a Conservation Area and does not contain any Listed Buildings or Ancient Structures. Six Grade II listed buildings are identified within 1km of the site, and a Grade II Registered Park and Garden approx. 388 m south of the Site, on the opposite side of West Chiltington Lane (A272). The impacts of the proposed installation of Electrical Infrastructure associated with BESS can be considered through the usual planning application process through the submission of a Heritage Statement.	Further information required with application: Landscape and Visual Impact Assessment; ZTV Assessments; Arboricultural Survey & Report, Planting Plan, Biodiversity Net Gain Measures, Heritage Statement

3. 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 impacts of the proposed BESS installations are largely confined to the site and the land immediately adjacent. Identified public receptor points along the PRoW and the highway have been identified within the supporting information and final details of these should be included in any future application submission. There are some limited residential dwellings located close to the site, and it is likely that the occupiers of these properties will be affected by the development	No significant and/or residual environmental impacts anticipated.

	during the construction phase, however, adverse effects would be temporary and minimised through the implementation of a CEMP. Areas of Ancient Woodland would largely interrupt views across the site from Old Keepers Cottage, but there would likely be some distant views from Goffsland Bungalow. The site area is noted as being 17.5ha or 12ha (as reported in section E and F respectively) this anomaly needs to be clarified in any application submission. Approx 1/3 of the site would contain the infrastructure related to the BESS, the remaining 2/3 of the site would contain landscaping, habitat and BNG provision associated with the development. As such the spatial extent of the proposals would be limited to that part of the site containing the BESS, the potential magnitude and likely impacts arising from the development would therefore be limited. Further details required to fully assess the likely impacts of the proposed BESS Installation are required.	Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed. Further information required with application include: Transport Assessment Travel Plan Landscape and Visual Impact Assessment; ZTV assessments; Glint and Glare Assessments
b) **the nature of the impact**	The site comprises a single field within the countryside, the scale of the proposed development could result in impacts on the landscape character and on visual amenity given the proximity and line of the PRoW and potentially with nearby	No significant and/or residual

	residents. The proposed installation of the BESS facility is limited to one third of the site (within the north and west area of the site) and close to the highway and as such the impacts would be limited in that respect within the wider site. Other environmental impacts would include noise and disturbance during construction and deconstruction of the facility (albeit temporary and with a 40 year pause between the two activities), and additional noise and emissions from vehicles during the operational stage, especially in respect of the nearby Cowfold AQMA. Limited impact is envisaged on natural habitat as the nature of the proposed development would be subject to a 40 year lifespan after which the land would be returned to agricultural grazing land. It is considered from the information submitted that it should be possible to secure compensatory habitats and biodiversity net gains around the site's perimeter, through on site mitigation.	environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development, at this stage it is not clear whether such conditions could suitably mitigate the extent of development proposed. Further information required with application Preliminary Ecological Appraisal (PEA) Landscape and Visual Impact Assessment; ZTV Assessment Glint and Glare Assessments

c) **the transboundary nature of the impact** (any international impacts)	The effects of the scheme would be local, therefore there will be no transboundary impacts. The effects of the scheme would contribute towards increasing flexibility of the national energy network by providing a storage facility which can be called on when needed.	N/A
d) **the intensity and complexity of the impact** (e.g. overall size, scale, combination of impacts)	The environmental and construction impacts arising from the installation of a BESS facility on this site within the countryside, would most likely be experienced by those living close to the site. A level of noise during construction and subsequent decommissioning is probable in the event that development takes place. Other impacts such as those on protected species are less certain at this stage, however these concerns may be eliminated with appropriate mitigation. The site subject to this EIA assessment is likely to be seen in the context of its rural undeveloped surrounds. Given the countryside location the proposal would need to be carefully considered within the immediate and local landscape context. Whilst some information has been provided, full details including supporting reports and surveys would be required as part of any future application, in order to fully assess the impacts of the proposed BESS facility on the immediate landscape and surrounds. It is considered however that the landscape implications of the proposal are likely to result in a modest impact that could be addressed through appropriate mitigation measures. Traffic impacts are likely to be low but further information is required in the form of a Transport Assessment.	No significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development: Further information required with application: Preliminary Ecological Appraisal (PEA) Transport Assessment Landscape and Visual Impact Assessment;

		Arboricultural Survey & Report and Planting Plan
e) **the probability of the impact** (e.g. overall probability of impacts identified above)	Landscape impacts are highly probable in the event that development takes place on the site. The temporary use of the greenfield site for BESS equipment for a period of 40 years would also be probable prior to removal of all electrical infrastructure and reinstatement to agricultural land. Lighting and noise impacts arising from traffic comings and goings during the construction period as well as land works would also be probable during the operational and decommissioning stages of the development, as would some air and dust pollution. It is advised that construction would likely take place over a period of 15 months with construction vehicles accessing the site from the existing field access. Short term and temporary impacts arising from transport and access to the site from Shipley Road via the M25, A24 and A272 and Shipley Road would occur as a result of the proposals in order to reach the site. A Construction Traffic Management Plan should be provided to explain the construction phase impacts of the proposed development on the highway network. Additionally, all relevant supporting information should be submitted for consideration and assessment as part of any future application to be submitted. Mitigation measures at planning application stage can be used to appropriately manage impacts arising from the development.	No significant and/or residual environmental impacts anticipated. Further information required with application: Transport Assessment Landscape and Visual Impact Assessment; Arboricultural Survey & Report and Planting Plan Air & Dust Pollution Assessment Noise and Vibration Assessment
f) **the expected onset, duration, frequency and reversibility of the impact** (demolition, construction, operation and decommissioning)	Construction effects would be temporary and short term in duration as would the operational effects which would be limited to a 40 year lifespan following installation of the electrical infrastructure (BESS). Thereafter, the land could be reverted back to its former and original agricultural use. It is anticipated that, if approved, development would likely commence (within 3 years of the decision date) provided that all related pre-commencement conditions	No significant and/or residual environmental impacts anticipated. Imposition of appropriate

	are formerly discharged. Construction impacts would be intermittent and reversible. Operation impacts would also be temporary, albeit over an extended period, and therefore ultimately reversible. Noise and disruption from traffic to and from the site would mostly be during the construction and de-commissioning period. During the operational period of the battery storage facility (BESS), some background noise is anticipated from this as well as from the associated (but limited) vehicle maintenance visits. It is advised that a combined LHMMP (LEMP and HMMP) would be submitted with any future application to address matters relating to land management throughout the operational phase of the development, and to demonstrate how the proposals would meet and deliver significant biodiversity net gains. The proposed battery storage use (BESS) could result in regular noise impacts during the construction phase. However, operational traffic impacts would likely be relatively limited even when combined with neighbouring uses. Further details would need to be provided within a transport statement to be submitted with any future application. Additionally, a noise assessment should also be submitted, this should take account of the existing back ground noise levels / characteristics of the site. Other impacts such as potential impacts on protected species in the surrounding habitats are unknown and require further investigation.	conditions may be required to control and mitigate against any impacts arising from the development. Further information required with application: Noise Report Construction Management Plan Transport Assessment Landscape and Visual Impact Assessment; Arboricultural Survey & Report and Planting Plan Preliminary Ecological Appraisal (PEA) Air & Dust Pollution Assessment Noise and vibration Assessment
g) **the accumulation of the impact with the impact of other existing and/or**	The construction phase would result in temporary construction impacts that could be managed through a CEMP. The operational development is unlikely to result in significant effects. The scale of the proposals and short timeframe for their	No significant and/or residual environmental impacts anticipated

approved development	construction would not lead to significant environmental impacts. There is no similar development taking place near or adjacent to the site. The main consideration with regard to cumulative environmental impact of this development is on landscape impact. Provided that the proposed development for the installation of the BESS is sensitively located within the wider site and integrated into the landscape (including appropriate mitigation as necessary), then it is unlikely to have a significant impact on the environment that would warrant the submission of a separate Environmental Statement. The proposal for the BESS would therefore be of a sufficiently manageable scale that effects could be managed in accordance with standard methods. This Authority has received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that development within this zone must not add to this impact. Whilst individual site allocations may not result in likely significant effects in isolation, in combination with each other and other projects and plans that the grant of planning permission in this instance would set the precedent for, they have the potential to result in adverse effects in the integrity of the SAC/SPA/Ramsar sites. A Water Neutrality Statement should be submitted with any future planning application. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations. It is therefore considered that, whilst the development falls within the criteria for Schedule 2 development, the scale and nature of the proposed development will unlikely lead to any significant environment effects, and in this case, EIA is not required.	No significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development. Further information required with application: Noise Report Construction Management Plan Transport Assessment Landscape and Visual Impact Assessment; Arboricultural Survey & Report and Planting Plan Preliminary Ecological Appraisal (PEA)

		Air & Dust Pollution Assessment Noise and vibration Assessment
h) **the possibility of effectively reducing the impact**	During the construction phase, adverse effects would be temporary and minimised through the implementation of a CEMP and best practice measures. Supporting Statements and studies are to be submitted with any future planning application to ensure the provision of appropriate mitigation on site. Measures to reduce the impact of the proposal on climate change, visual and landscape impacts, and ecology should be integrated into the proposals where possible and details provided as part of any future planning application. Conditions would be imposed to secure the provision of any necessary mitigations.	No significant and/or residual environmental impacts anticipated. Imposition of appropriate conditions may be required to control and mitigate against any impacts arising from the development. Further information required with application: Construction Management Plan

Results of any relevant EU environmental assessment that is reasonably available	None applicable	

Conclusion

EIA Required?	No
Statement of reasons	The Proposed Development is not a Schedule 1 development, and it is not located in a sensitive area. Whilst the threshold for site area is exceeded in Schedule 2 of the EIA regs. (2017) the effects of development are considered not to be significant when considered as a whole. There would be some impact on natural resources including biodiversity, and the production of waste and pollution during the construction phases however these are considered to not be significant in relation to the types and characteristics of the potential impact. There is likely to be some negative landscape and traffic impacts arising from the impact of the development on the countryside surrounding the development site arising from the introduction of the proposal development which involves the temporary redevelopment of agricultural land (for a period of 40 years), before reverting to the original agricultural use. Therefore, notwithstanding this, it is considered that with appropriate mitigation secured through planning conditions and/or a legal agreement where necessary, these impacts are considered to not be significant. The traffic impacts of the proposed development will be need to be managed, to limit the impact of the vehicles on the surrounding transport network so that any impacts and resultant effects upon receptors that do occur are not significant. This could include routing movements during off-peak travel hours and a just-in-time delivery system on site to avoid the potential for off-site queuing depending on the frequency / intensity of the deliveries. Noise arising from the Proposed Development during its operation has the potential to result in adverse effects to existing noise sensitive receptors. Noise will need to be assessed according to the relevant standard (which is British Standard BS4142) and mitigation measures (such as screening or restrictions on certain activities at particular times) may be used to ensure that noise levels at nearby noise sensitive receptors either do not result in any adverse effects or are mitigated and minimised so far as is reasonable, in accordance with Planning and Noise Policy requirements. Details of the assessment, including baseline survey data, predicted levels and mitigation measures would be provided within a noise impact assessment submitted with the planning application.

	There may be some impact on other areas such as ecology, archaeology and heritage however these can be suitably mitigated and would not likely be significant, however further information is required in terms of these aspects to fully appreciate the impact of the proposed development, however the impacts identified at this stage are not considered to be significant enough to trigger an EIA. The screening assessment for this proposal has identified that the majority of impacts on the environment could be similarly addressed with mitigation measures incorporated within the details of the proposed development, and that significant effects are not considered likely, either alone or in combination with other development. The proposals would be of a sufficiently manageable scale that effects could be managed in accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations. It is therefore considered that, whilst the development is Schedule 2 development, it has been demonstrated from the current level of information provided that the proposed development will be unlikely to cause significant environment effects, and in this case, EIA is not required.
Date	**Amanda Wilkes** - 28 May 2024