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Planning Department
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Dear Nicola,

**TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017
REQUEST FOR A SCREENING OPINION UNDER REGULATION 6
LAND AT HORN BROOK FARM, HORSHAM, BRIGHTON ROAD, RH13 6QA**

Summary and Introduction

On behalf of our client, Jaynic Properties Ltd and Hornbrook Developments LLP (the 'Applicant'), we write to request a Screening Opinion from Horsham District Council to determine whether a proposed development for up to 180 residential dwellings at the above site should be subject to Environmental Impact Assessment.

The Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') detail developments in two schedules:

- Schedule 1 – identifies sites requiring EIA; and
- Schedule 2 – identifies development sites where, if the relevant threshold criteria are exceeded, consideration must be given against Schedule 3 to determine whether EIA is required.

The proposed development does not fall within any of the categories within Schedule 1 so no mandatory EIA is required.

In terms of Schedule 2, part 10(b), the proposal is an 'urban development project' and it exceeds the threshold identified by the regulations whereby the development includes more than 150 dwellings, or the overall area of the development exceeds 5 hectares. Consideration is therefore, required against the relevant criteria to determine if EIA is needed in this case.

This request for a Screening Opinion is made in accordance with the procedures set out in Part 2, Regulation 6 of the EIA Regulations and includes the following:

- A plan sufficient to identify the land (see figure 1);
- A brief description of the nature and purpose of the development and of its possible effects on the environment;
- Such other information or representations as the person making the request may wish to provide or make.

This letter explains how we have assessed the development proposal and site in accordance with Schedule 3 of the EIA Regulations and the National Planning Practice Guidance¹ (NPPG). It explains how we consider that the proposed development would not give rise to significant environmental effects and, therefore, would not require an EIA.

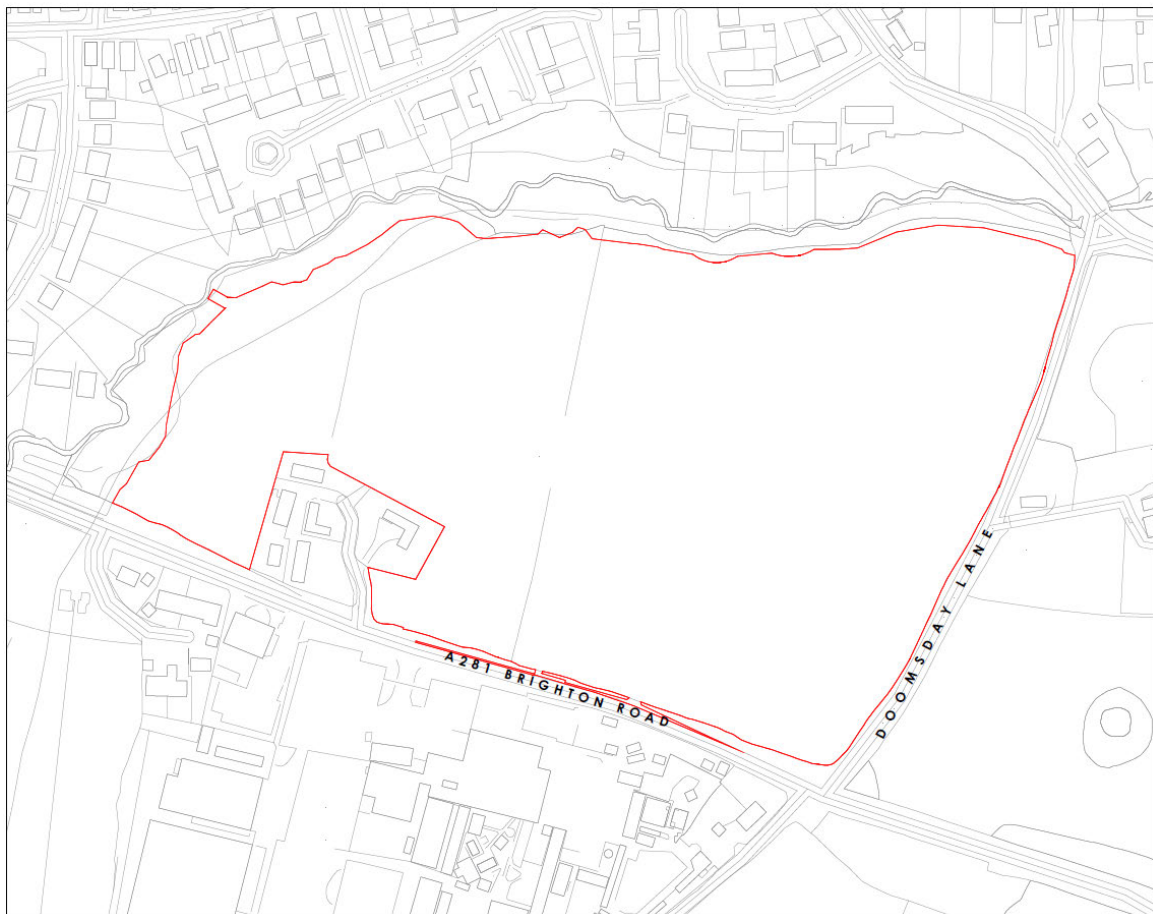


Figure 1: Site Location

Schedule 3 Assessment

In accordance with Schedule 3 of the EIA Regulations, the proposal has been assessed against the guidance criteria categorised in the characteristics of the development, location of the development and characteristics of potential impact.

¹ Department of Communities and Local Government (DCLG) (2017);

Characteristics of Development

The proposals comprise residential development to provide up to 180 dwellings delivering a mix of 1 to 4 bedroom homes including single storey bungalows and additional dwellings of two to two-and-a-half storeys in height. Affordable housing is proposed to be 35% of the total units (approximately 63 units). The homes will also be provided with amenity space, car parking and refuse facilities. Private amenity space in the form of a balcony, terrace or gardens will be provided for each dwelling.

The proposals also comprise an expansive area of open space across the site, which also includes an area set back from the Horn Brook to protect the river corridor and associated ecological habitats.

Of the total site area of 9.23ha, a substantial part of the site will be allocated to amenity open space, with housing proposed over around 4.83ha. Green corridors incorporating pedestrian and cycle routes will be created to support connected biodiversity networks and create attractive residential amenity.

Building heights are likely to include two-storey to two-and-a-half-storey, terrace, semi-detached and detached buildings, and some single-storey bungalows.

The proposals will seek to optimise the site while respecting its environmental context. It proposes to take advantage of its sustainable location² by proximity to Horsham town centre and to good walking, cycling and public transport routes.

The proposed development is comparable in nature to development proposals within the area developed under allocations in the Local Plan. The site is identified as a proposed housing allocation in the emerging Local Plan as Settlement Site Allocation HOR1: Land at Hornbrook Farm supporting Policy HA10. This proposes housing development as extensions to Horsham given the site adjoins the south-eastern built-up area boundary of Horsham town. The potential range and nature of impacts are common to those developments and are both normal and consistent with moderate scale housing development that occurs as an extension to the urban area.

The size and design of the housing development is not of a scale that will cause impacts beyond the local level and is well below the thresholds set out within the EIA guidance. The guidance indicates EIA may be required for urban development above 1,000 homes with significant urbanising effects. The proposal is very substantially below this level and has only site specific or localised impacts.

In conclusion, the characteristics of the development will not give rise to significant effects.

Location of Development

The site is located within the urban fringe of Horsham, the principal town in the District.

² Shaping Development in Horsham Planning Advisory Note (2025)

<https://www.horsham.gov.uk/planning/planning-policy/shaping-development-in-horsham-district>

The site is bound by existing urban features with the residential area of Horsham to the north and west being predominantly post-war two storey housing. Brighton Road (A281) is to the south, which includes local community facilities such as the Hillier Garden Centre and its various retail functions and ancillary uses, and The Hornbrook public house. Further residential properties are located at Hornbrook farm and additional dwellings off Doomsday Lane and Magpie Lane to the south.

As referenced above, the Council's assessment (Shaping Development in Horsham, 2025) considers the site's locational suitability, scale and deliverability to support the aim of meeting the local housing needs. The Council's Regulation 19 Site Assessment Report notes that environmental considerations will require some mitigation but these should not be a barrier to bringing forward this important housing allocation site.

The developable part of the site lies within Flood Zone 1 and hence is at a low risk of flooding. A small area of land running along the Horn Brook part of the site is identified as being at risk from flooding, however no residential development is proposed outside of Flood Zone 1.

The site is not located within any environmental designations or sensitive area, as listed by Schedule 3. Neither is the site located in a Special Site of Scientific Interest, National Park, National Landscape, Conservation Area or schedule monuments. It is considered to be outside of sensitive habitats and features. However, there are listed buildings to the south at the junction of Brighton Road and Sedgwick Lane. The Proposed Development is also located beyond the boundary of the High Weald National Landscape, although lies within its setting and as such is considered a sensitive area as defined by the EIA Regulations.

The Proposed Development site falls within the Sussex North Water Resource Zone (WRZ) as defined by Natural England and which draws its water supply from groundwater abstraction managed by Southern Water. It is therefore necessary to assess whether new development in this Zone could have adverse effects on the integrity of the following nearby designated sites:

- The Arun Valley Special Protection Area (SPA).

In order to protect water neutrality within the Horsham area, the Council and the other Sussex North authorities, as well as Natural England, had agreed a set of mitigation measures as a water certification initiative which allowed residential development to continue to come forward. The Sussex North Water Certification Scheme (SNWCS) was due to be formally launched later this year; however, the need for that scheme has now been withdrawn by Natural England. The Council will carry out an Appropriate Assessment with regard to the Habitats Regulations requirements; however, there are no outstanding locational characteristics that make the site unusual or sensitive in water neutrality terms.

The site and its proposed characteristics are typical of the urban fringe, both related to and influenced by the adjacent urban area. Overall, it is not a sensitive environmental area for the purposes of the Regulations.

Characteristics of Potential Impact

In considering the characteristics of potential impacts arising from the development against the criteria in Schedule 3 of the Regulations, the likely impacts arising from the development proposed are site specific and localised in nature, being limited to the site itself and to a local area around the site, which largely comprises the urban area of Horsham.

Any impacts are likely to also be small in scale, commensurate with the scale of development proposed. The developable area of the scheme within the site is under 5 hectares and is also less than 20% of the further relevant indicative criteria and threshold for housing schemes being new development of more than 1,000 dwellings.

There are likely to be no transboundary effects.

The project is similar to many housing development projects on similar sites that have been developed under the terms of the current Local Plan, none of which were found to require EIA.

The development and its potential effects are not complex or unusual.

The Proposed Development site comprises rough grassland and arable farmland with hedgerows and some mature trees. It has not been designated as important for nature conservation and is not environmentally sensitive with the large proportion of the development site having low ecological value.

The proposal comprises around 180 dwellings that would help meet housing needs and add to the local housing stock, including affordable housing. The development will also include significant public open space and green corridors.

Requirements relating to sitewide drainage and biodiversity net gain will inform both the layout and a landscape strategy. This will incorporate ecological enhancement measures and an onsite drainage system to meet surface water runoff requirements. All land within the developable area is located within Flood Zone 1 (lowest probability of flooding) meeting the requirements of the sequential test. It will include collection and attenuation facilities through appropriate sustainable drainage systems confirmed by the Lead Local Flood Authority. Biodiversity is focused on the retention and enhancement of existing boundary hedgerows and trees where possible, and where they are considered to have amenity value.

A full suite of supporting documents will be submitted with the outline planning application. In accordance with the Council's Development Management Local Information Requirements for Validation list.

The potential impacts that may arise from the proposed development are traffic, landscape, ecology, flood risk and drainage, climate change, heritage and socio-economic, all of which are discussed further below. These are normal considerations in any residential development of this scale and nature. None of the impacts are predicted on the basis of current assessments to give rise to significant effects either

in themselves or in cumulation with other schemes nearby that would give rise to a need for EIA.

In summary, Schedule 3 lists criteria to be taken into account in relation to the characteristics of the potential impacts. The criteria are listed as:

- a) the magnitude and spatial extent of the impact;
- b) the nature of the impact;
- c) the transboundary nature of the impact;
- d) the intensity and complexity of the impact;
- e) the probability of the impact;
- f) the expected onset, duration, frequency and reversibility of the impact;
- g) the cumulation of the impact with the impact of other existing and/or approved development;
- h) the possibility of effectively reducing the impact.

In this case the proposals are not complex, novel or of a magnitude that would give rise to particular issues. The quantum of development is well below the threshold noted in the next section for housing projects where EIA is required.

The accompanying technical evidence supports the conclusion that through the implementation of appropriate mitigation, all of the identified impacts are likely to be at levels that will not give rise to significant environmental effects.

National Planning Practice Guidance

In order to provide further interpretation to Schedule 2 projects within the EIA Regulations, it is important to refer to the guidance contained in the NPPG. The NPPG was published in March 2014, and updated in July 2017, which was previously used for guidance in relation to EIA Screening.

The NPPG outlines that only a small proportion of Schedule 2 projects will require an EIA:

“Only a very small proportion of Schedule 2 development will require an assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced.”

Further to the above, the criteria and thresholds set out in the NPPG have been updated to reflect the amendments contained in the EIA Regulations. The relevant extract (Indicative Screening Thresholds) from the NPPG is set out below.

Development type	Schedule 2 criteria and thresholds	Indicative criteria and threshold	Key issues to consider
10. INFRASTRUCTURE PROJECTS			
(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas;	(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings; or (iii) the overall area of the development exceeds 5 hectares.	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. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).	Physical scale of such developments, potential increase in traffic, emissions and noise.

Source: Extract from the National Planning Practice Guidance (Paragraph: 058 Reference ID: 4-058-20150326)

The extract from the NPPG above refers to indicative thresholds that include developments with significant urbanising effects, such as the area of the housing development being more than 5 hectares and development of more than 1,000 dwellings. Therefore, whilst the proposed development exceeds the 150-dwelling threshold for Schedule 2 projects, with around 180 dwellings proposed, this is substantially below the stated further threshold.

The indication of the guidance is therefore, that EIA is not likely to be required.

Notwithstanding this, we have provided further information that indicates there are no characteristics concerning the site's location that are exceptional to warrant EIA as presented below.

Planning Background

Draft Strategic Policy HA10: Horsham Housing Allocations sets out a proposed allocation for the provision of "at least 400 homes" across two sites including "HOR1: Land at Hornbrook Farm, 10.45 hectares (100 homes)". Representations in support of the allocation of the site for housing were submitted under both the Regulation 18 and Regulation 19 consultations.

In the Council's Regulation 19 Site Assessment Report it has been demonstrated the site has potential for residential development and any built development would need to ensure any impact on the National Landscape and nearby listed buildings is not adversely affected.

The Council's recently approved Shaping Development in Horsham District (SDPAN 2025) has confirmed the site remains identified for development within the emerging Local Plan and that *"It is the Council's view that the proposed site allocations are based on robust evidence, most notably site assessment work and were capable of accommodating sustainable development. For this reason, the Council will consider positively proposals on sites identified in the eLP, which accord with such evidence and are in accordance with (non-housing supply) HDPF or Neighbourhood Plan policies."*

Pre-application discussions and meetings have taken place with both Horsham District Council as the Local Planning Authority and West Sussex County Council in respect of Highways, Drainage and Archaeology. These have informed the development parameters and supporting documents will demonstrate there will be limited impact to the surrounding designations.

Likely Environmental Impacts of the Proposed Development

The environmental matters that the proposed development could potentially impact upon are:

1. Traffic and Transport
2. Landscape
3. Ecology
4. Flood Risk and Drainage
5. Water Neutrality
6. Climate Change
7. Heritage
8. Socio-Economic

A range of assessments have been undertaken at the pre-application stage to assist with the design and delivery of the proposals. These assessments have also been

used to identify any significant environmental effects, which informs this EIA Screening process.

Summary of Likely Environmental Effects

Traffic and Transport

The proposal incorporates sustainable links to central Horsham to the west, with a proposed pedestrian/cycle crossing point on Brighton Road which will also provide connectivity to the existing (and relocated) bus stops; and access to the north (including to the schools), via the existing Public Rights of Way along Brighton Road. The proposal incorporates a new site entrance via a new junction with Brighton Road (A281) following consultation with West Sussex County Council Highways.

The updated NPPF (2024) reinforces the need to adopt a vision-led approach to Transport Assessments. This revised approach means that the applicant's transport consultants will:

- Identify the transport needs of the development and develop a vision of how they can be met;
- Consider development and infrastructure scenarios;
- Formulate and test transport infrastructure options (including mitigations); and
- Produce a vision strategy.

The vision-led approach represents a more up-to-date way of addressing transport needs to ensure forthcoming developments represent sustainable development which reduces the reliance on the private car. Taking these steps will entail identifying and quantifying the likely modal shift which would result from aspirational transport measures, and working with the highway authority to ensure the scheme meets the objectives of both the applicant and the District and County Councils.

A Framework Travel Plan will aim to reduce single occupancy car journeys. New pedestrian routes are created within the site as well as providing an additional leg to the Riverside Walk, along the Horn Brook with links to and around the open space proposed.

Landscape

The 2021 Landscape Capacity Study shows the site as being within Local Landscape Character Area (LLCA) 19 (Land South East of Horsham). There are urban influences, including Hornbrook Nurseries, residential development and farm buildings. These influences are most apparent and acknowledged as being primarily in the western part of the LLCA where the site is located. Taking these characteristics and the very local landscape aspects that have led to the site becoming a housing allocation in the emerging Local Plan, the study concludes that the land to the west of Doomsday Lane is a suitable site for development in landscape and visual terms.

The setting of the High Weald National Landscape offers a valuable opportunity to provide a landscape led development. Additional boundary planting will soften the visual transition with the proposed development and ensure that it is well contained.

The proposed scheme has been developed to be offset from the flat ridge at the edge of Horsham and is focussed on the slopes facing the existing settlement to the north, thereby limiting its wider impact on the local landscape. A 'frontage' of lower height and density will also respond to local vernacular adjoining a large area of open space which is being created to provide a high quality landscape buffer in the setting of the National Landscape.

Overall, the landscape effects are considered to be largely limited to changes within the Site itself, with very limited effects on the wider area given the inward facing north/ north-west orientation of the Site towards the settlement, coupled with its containment in the immediate surrounding wooded and built context. There will also be no direct effects on the National Landscape itself; however, whilst it is recognised that there will be a change to its setting, the existing town already directly adjoins the National Landscape edge and the proposed scheme takes into account the setting by allowing an offset of open space as a buffer with new planting.

Ecology

The site is not located in any ecological designation. An updated Preliminary Ecological Assessment has been undertaken and the majority of the land is of low ecological value. Further ecological surveys and impact assessments have been carried out in relation to great crested newt, breeding birds, roosting bats, foraging/commuting bats, hazel dormouse and reptiles. Habitats of greater value are present at the edge of the field compartments including woodland, mature trees and hedgerows of high ecological value.

It is considered likely that great crested newts are absent from the survey area. The survey area supported a moderately rich breeding bird assemblage, with eight species of conservation concern. The most important area was the woodland and scrub along the Horn Brook outside the developable area. In relation to bats it is considered proportionate to classify the survey area as being of Local Importance.

The site is otherwise considered to be of negligible or low value to other protected or notable species.

Flood Risk and Drainage

The vast majority of the Site is not in an area of fluvial flood risk (i.e. from rivers), and all the land to be included within the developable area is located within Flood Zone 1 (lowest probability of flooding). Consequently, the Site meets the requirements of the sequential test in directing development towards areas with the lowest flood risk and therefore flood risk does not present a constraint.

Surface water shall be collected, attenuated, and conveyed via appropriate sustainable drainage systems and treatment trains prior to outfalling into the adjacent watercourse (Horn Brook) at the greenfield runoff rates. Foul water will discharge to the nearest Southern Water foul water sewerage system.

Water Neutrality

The development will look to achieve water efficient fixtures and fittings, with the potential for rainwater harvesting to be installed to each dwelling to reduce water consumption. On 31 October 2025 Natural England confirmed the withdrawal of its September 2021 Position Statement on water neutrality in the Sussex North Water Supply Zone. The proposal will no longer be required to provide water neutrality statements.

Climate Change

The energy and climate change strategy for the development will seek to achieve particularly low embodied and operational-in-use carbon emissions through the adoption of design principles to mitigate future climate change impacts. The proposals are expected to have a net benefit impact owing to the following factors:

- The site's sustainable location on the edge of Horsham being the principal settlements and in proximity to goods and services, including public transport, reducing reliance on the private car and promoting walking and cycling and healthy lifestyles;
- The design incorporates sustainable travel measures such as a permeable pedestrian and cycle network with strong connections to the surrounding area, a relocated eastbound bus stop on Brighton Road and new crossing point,
- Electric vehicle charging points to be installed in accordance with West Sussex County Highways standards;
- All units will aim to incorporate on-site renewable energy and will be designed and built to standards including Building Regs Part L, limiting energy demand;
- Construction waste will be minimised through commitments in a sustainable waste strategy to recycle as much as possible.

Heritage

An Archaeological and Heritage Desk Based Assessment has been undertaken to determine the cultural heritage potential of the site, its surroundings and wider local and regional context.

There are no World Heritage Sites, Registered Battlefields or Conservation Areas recorded within the 1km study area. There are multiple Listed Buildings within the study area, including close by on land to the south of the site where Hiller Cottage and Falcon Lodge are located, both Grade II listed. These assets are not in a proximity to proposed built development such that their historic setting would be affected by the proposal. It is considered the development will have a neutral or no impact on these assets and their settings.

In terms of archaeology, the potential for in situ deposits is considered to be low for all periods of archaeological activity and geo-physical survey work did not identify any significant geo-physical anomalies.

The desk-based assessment concluded that no further archaeological action will be required related to the development, which is equally applicable to the built heritage assets with any post planning evaluation to be conditioned.

Socio-economic

The proposal of up to 180 dwellings together with open space provision will deliver positive socio-economic benefits to the community. These comprise new housing, including affordable housing, contributions to health and education and new recreation facilities, footpaths, cycleways and open space. These benefits are in a sustainable location that supports the economy and community of the principal town in the District.

Of the 180 dwellings, 63 units (35%) is proposed for affordable housing, a significant number against the borough's required need. The unit typology and proposed tenure mix as affordable rent, and affordable sale would align with the current need in the District.

Public realm is given a great deal of attention in the layout design. Linkages with the neighbouring residential areas and a network of corridors passing through the site will make for a permeable development that is not exclusive but accessible for the wider community to access.

The construction phase will also deliver benefits through the employment of local contractors and suppliers, injecting substantial amounts of money into the local economy. A greater positive impact will occur when the development is occupied by residents generating high spend levels, a great level of which is expected to be retained in Horsham town centre given its proximity.

Conclusion

This report sets out sufficient information to allow the Council to formally screen the proposed development in accordance with the EIA Regulations and the guidance set out in the NPPG.

Based on the above, we conclude that the proposed development should not be considered EIA development, and therefore an ES is not required. EIAs should be reserved, as intended by the legislation, for developments which have a realistic likelihood of causing significant environmental impact individually or in combination with nearby development, which the proposed development would not result in.

The site is not in an environmentally sensitive area and no exceptional or unusual environmental characteristics, either of the site or the development, are present. Having regard to the criteria set out in Schedule 3 of the EIA Regulations and the NPPG indicative thresholds, it is considered that this proposal would not cause significant effects on the environment and therefore should not be considered EIA development.

Notwithstanding this conclusion, the planning application will be supported by several

technical studies to set out the results of the assessments noted in this report and provide a basis for consideration of the application and mitigating potential environmental effects outside the scope of an EIA, including:

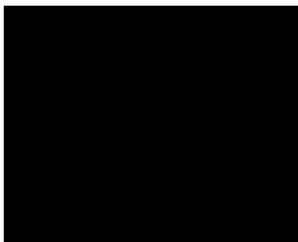
- Parameter Plans
- Flood Risk Assessment and Drainage Strategy
- Planning Statement and Design & Access Statement
- Heritage and Archaeological Desk Based Assessment
- Landscape Masterplan and Landscape Visual Impact Assessment
- Land budget Plan
- Landscape Management and Maintenance Plan (outline)
- Arboricultural Impact Assessment
- Biodiversity Net Gain Assessment with Defra Metric
- Transport Statement and Parking Strategy
- Sustainability Statement
- Air Quality Assessment
- Acoustic Assessment
- Phase 1 and 2 Contaminated Land Assessment

The assessments will consider the proposals against the existing surroundings but also in the context of other committed proposals in the vicinity, as appropriate.

Drawing on the information provided in this letter and in accordance with the procedures of Part 2, Regulation 6 we request a Screening Opinion from the Council within three weeks of receipt of this letter. I look forward to receiving the Council's formal Screening Opinion shortly. In the interim, if you require any additional information to assist you in adopting your opinion, please do not hesitate to contact me.

I trust that this assists, but please let me know if you require anything further.

Yours sincerely



Chris Frost – MRTPI
Director