

Planning Department
Horsham District Council
Parkside
Chart Way
Horsham
West Sussex
RH12 1RL

Our Ref 0961

23 May 2025

Dear Planning,

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING REQUEST FOR PROPOSED
SOLAR AND BATTERY ENERGY STORAGE SYSTEM (BESS)**

LAND TO THE SOUTHWEST OF PICTS LANE, BOLNEY

Introduction

This Screening Request ('the Request') has been prepared by Stephenson Halliday Ltd, on behalf of Pivoted Power LLP ('the Applicant'), an owner subsidiary of EDF Energy Renewables Limited, prior to the submission of a formal planning application.

This Request is made under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 ('the EIA Regulations') to formally request an EIA Screening Opinion from Horsham District Council ('the Council') for a proposed Solar Farm and Battery Energy Storage System (BESS) ('herein referred to as 'the Proposed Development').

The area encompassed by the Proposed Development is located to the north of the A272 and to the north east of Cowfold village, in West Sussex ('the Site'). The extent of the Site is shown in the enclosed Site Location Plan. The Site measures approximately 48ha and comprises a range of agricultural fields.

The Proposed Development is for up to approximately 30MW solar array and up to approximately 47.5MW BESS, and would be in operation for a temporary period of 40 years, after which all equipment would be removed from the Site, with the land restored to its former use.

The main elements of the Proposed Development comprise:

- Solar panels mounted on metal framework in rows across the Site
- "String" Inverters in housing attached to the back of array framework
- Battery Storage Units in prefabricated containers
- 1 No. DNO Substation, typically a prefabricated building
- 1 No. Customer Switchgear Unit in a prefabricated kiosk
- 1 No. General Storage Unit in prefabricated container

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- PV Monitoring Building
- Transformer stations/MV switchgear
- Perimeter security fencing (deer fencing) up to 2.4m high
- CCTV security cameras
- Access from the highway and internal access tracks; and
- Landscaping and biodiversity enhancements

The Site will be accessed from the east via the A272. Traffic will turn from the A272 onto Long House Lane and Picts Lane and gain access into the Site from Picts Lane.

The planning application submission will include the Applicant's cable route facilitated via underground cables to connect the Proposed Development to the point of connection at Bolney substation. A small section of the grid connection is within the jurisdiction of Mid Sussex District Council ('MSDC'), who have been sent a copy of this correspondence. Notwithstanding, it is requested that MSDC are consulted as part of the Screening process.

Purpose and Justification for the Application

There is a demonstrable and urgent requirement for the development of renewable energy to meet the net zero targets and ensure security of the UK energy supply.

The UK's legally binding requirement is to reach net zero emissions by 2050. Solar energy plays a vital part in the commitment to decarbonise energy supply in the UK and to transition to low carbon energy to reduce our reliance on fossil fuels, such as gas.

The photovoltaic panels within the Site would generate up to 30MW of electricity, to be exported to the national grid. The Proposed Development will produce enough clean energy for approximately 10,000 homes annually¹, helping to contribute to the Government's legally binding Net Zero target and to secure the nation's energy supply in the context of a volatile global market.

The current relevant EIA legislation is in the form of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), as amended.

Development may be categorised as 'EIA Development' either because it is of a type which falls within the description set out in Schedule 1 of the EIA regulations or falls within a description of development in Schedule 2 and is likely to have significant environmental effects on the environment by virtue of its nature, size, or location. Solar Farms are not included in the list of developments in Schedule 1 which would automatically be screened as EIA development.

The proposed Site area exceeds the threshold of 0.5 (ha) and falls within category 3 – Energy industry in sub-category (a) – "Industrial installations for the production of electricity steam and hot water". As such, a screening opinion should be sought for the Proposed Development to establish whether significant effects are likely, in which case it would constitute EIA development.

¹ based on the installed capacity as per the layout and an average household consumption of 3,400Kwh (this data is from Average household electricity usage GB by region| Statista)

Information in Support of the Screening Request

Section 6 of the EIA Regulations outlines the information required to support a screening request made to the relevant planning authority, which includes the following:

- (a) a plan sufficient to identify the land.*
- (b) a description of the development, including in particular—
 - (i) a description of the physical characteristics of the development and, where relevant, of demolition works;*
 - (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;**
- (c) a description of the aspects of the environment likely to be significantly affected by the development;*
- (d) to the extent the information is available, a description of any likely significant effects of the Proposed Development on the environment resulting from—
 - (i) the expected residues and emissions and the production of waste, where relevant; and*
 - (ii) the use of natural resources, in particular soil, land, water, and biodiversity; and**
- (e) such other information or representations as the person making the request may wish to provide or make, including any features of the Proposed Development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.”*

To assist the Council in screening the proposals, the enclosed Table 1.1 provides an assessment of the potential for likely significant effects of the Proposed Development.

The Site and Proposed Development Characteristics

The Site covers an area of approximately 48ha of agricultural land situated to the north east of the village of Cowfold. **Appendix 1** (extract below) shows the indicative proposed layout ('the Proposed Layout') in the context of the surroundings:

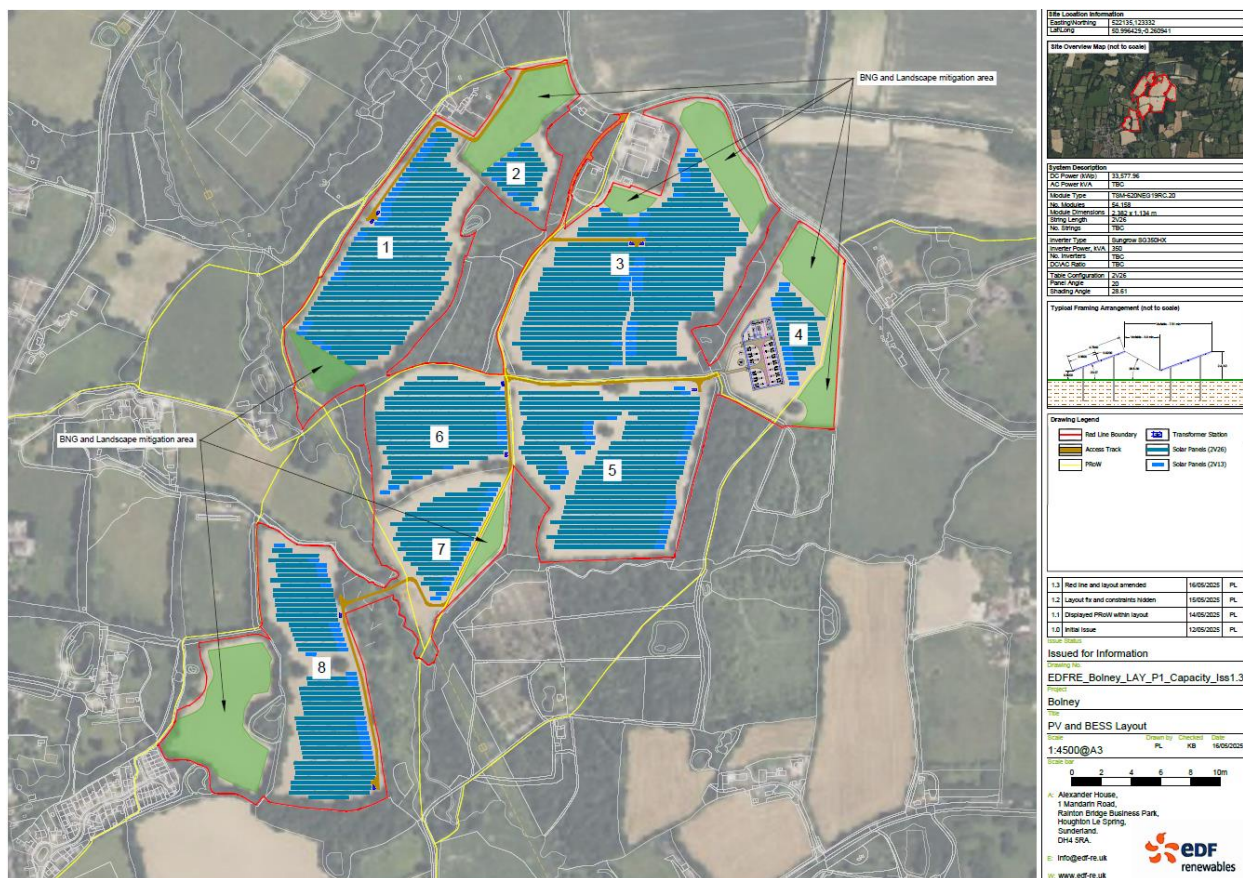


Figure 1: Indicative Site Layout

The Site comprises 9 parcels of land which are in agricultural use. They vary in shape and size with a network of hedgerows, trees and woodland defining them. The south western parcel of the Site abuts the village of Cowfold, which is not proposed to have any built development. Picts Lane forms the boundary between the Site and the High Weald National Landscape (HWNL) located to the north.

The topography of the Site falls towards Cowfold Stream which is located centrally within the Site. Two overhead lines (OHLs) pass over the Site adjacent the course of the stream connecting to the Bolney Substation to the south.

The surrounding uses predominantly comprise agriculture, although Cowfold village is located to the south west. In addition, a small number of residential properties are located within the vicinity of the Site, most notably Picts Farm, Pound Cottages, Aglands Cottage and Ashurst Cottage. A range of agricultural buildings are located at the northern end of the Site at Aglands Farm together with an agricultural workers cabin, which was granted planning permission in 2022.

As shown in the Proposed Layout, the solar arrays will be located in Sections 1, 2, 3, 4, 5, 6, 7 and 8. Section 4 will accommodate the proposed BESS together with a smaller array of panels. The BNG and Landscape Mitigation Areas have been strategically positioned to provide buffers from either the National Landscape to the north, nearby residential properties or the village of Cowfold itself.

The vehicular access route to the Site will be taken from Picts Lane, which will connect to the A272 located to the south. Access to the wider road network is then possible via the A23 situated approximately 5km to the east of the Site, which connects to the M23 approximately 12km to the north. It is currently intended that this will form the access route to the Site rather than passing through the village of Cowfold itself. Figure 2 below shows the vehicular access route to the Site from the A272:



Figure 2: Vehicular Access Route

In terms of the entrance points into the Site itself, there will be two points of access as indicated on the Proposed Layout. These are:

1. Aglands Farm Access (Construction, Operation and Emergency)

The main entrance to the Site for construction and operational purposes would be from the north via the existing entrance serving Aglands Farm, and utilising the access track which passes to the west of Aglands Cottage. Internally, the existing agricultural tracks will be used where possible, and new access tracks provided where required. Improvements to the existing bridge which crosses Cowfold Stream will be provided where necessary.

Means of access to the BESS Compound for construction, operation and emergency purposes would be provided from the Aglands Farm Access.

2. Picts Lane Access (Construction)

The Picts Lane Access which is located circa 115m to the north west of Aglands Farm would be used for construction purposes only to serve Sections 1 and 2, identified on the Proposed Layout. This will be a temporary construction access onto Picts Lane which will utilise either breaks in the hedgerow or the removal of poor quality hedgerow to minimise impacts. Following construction of those sections, this temporary access to the highway will be closed and the hedgerow made good and improved.

Within the Site, there are 4 public rights of way (PROWs) which cross the Site, which include 1749, 1752, 1753 and 1755. A number of other PROWs are located within 1km of the Site which include 1754, 1756 and 1750 (part of the Sussex Diamond Way). The PROWs within the Site will be retained in their legal position and appropriate buffers will be applied. The PROWs will remain accessible throughout the lifetime of the development, and landscaping will be provided where appropriate.

As previously mentioned, the planning application submission will include the Applicant's cable route, facilitated via underground cables to connect the Solar Farm to the point of connection at Bolney Substation. The route is expected to travel eastwards from the Site along Picts Lane and Bull's Lane, and travel south along Spronkett's Lane and Wineham Lane, crossing the A272 between the two. Figure 3 below illustrates the indicative grid connection route on an Aerial Image:



Figure 3: Indicative Grid Connection Route

Landscape and Visual

The Site is located within a landscape of large woodland blocks and established field boundary hedgerows and in combination with localised landform this would limit intervisibility between the fields within the Site as well as visibility into the Site. A Zone of Theoretical Visibility (ZTV) (**Appendix 2**) has been produced which demonstrates the screening effect of the existing vegetation and the limited visibility of the Proposed Development from outside of the Site and in the wider landscape.

It should be noted that vegetation below 2.5m in height is not modelled in the ZTV and this would add an additional layer of screening in the landscape. The actual extent of visibility on the ground would still typically be less than suggested on the ZTV and a previous iteration of the ZTV was ground truthed in the field in winter during a site visit undertaken in January 2025, when vegetation was bare leaf. This confirmed that visibility of the Proposed Development would be limited, and visibility would be further reduced in summer.

The boundary of the High Weald National Landscape (HWNL) follows the route of Picts Lane and would therefore be adjacent to the Site's northern boundary. However, the extent of visibility within the HWNL indicated by the ZTV is limited. Current views southwards towards the Site, from within this limited extent of the HWNL, are such that much of the Site would not be visible and where the Proposed Development would be discernible, it would be experienced in the context of large agricultural outbuildings and high voltage electricity transmission cables and pylons which cross the landscape.

Cognisant of the proximity to the HWNL, the Proposed Development layout has undergone several revisions and buffers have been created to ensure that infrastructure is set back from the Site's northern boundary and Picts Lane. Proposed mitigation measures along field boundaries adjacent to Picts Lane include infill of existing hedgerows, creation of new species rich hedgerows and planting of hedgerow trees which following establishment would filter views from within the HWNL.

The planning application for the Proposed Development will be supported by a Landscape and Visual Appraisal (LVA). The LVA will include an assessment of key viewpoints within a 3km radius of the Site which is considered sufficient to provide a proportionate assessment of the visual effects of the Proposed Development on key receptors.

Ecology and Arboriculture

There are no statutory ecological designations within the site. There is an area of ancient woodland known as Horse Wood which is located adjacent to a section of the southern boundary of the Site.

The Proposed Layout has taken into account the Ancient Woodland and a buffer has been applied to ensure that works and infrastructure will not have an impact. An Arboricultural Assessment will be conducted to ensure Root Protection Areas are avoided and that no Ancient Woodland will be felled. As such, it is concluded that there will be no impact on the Ancient Woodland as a result of the Proposed Development.

Ecological assessments (Preliminary Ecological Appraisal and Ecological Impact Assessment) will be undertaken, and mitigation put in place to ensure that there are no significant adverse effects on sensitive habitats and protected species due to the Proposed Development. A suite of surveys will be undertaken for protected species. If protected species are found to be present, it is the Applicant's

intention to embed site-specific mitigation within the project design to ensure that there is no potential for significant adverse effects, or to secure a district level licence depending on the outcome of surveys. Construction works including any vegetation clearance would also avoid the breeding bird season and a pre-commencement survey would be conducted if required.

The Proposed Development does not fall under any exemptions for mandatory biodiversity net gain according to the latest guidance released by DEFRA. A 10% biodiversity net gain on the baseline value of the Site will be achieved through a suite of biodiversity enhancements detailed in a Biodiversity Net Gain Assessment.

Glint and Glare

The planning application for the Proposed Development will be accompanied by a Glint and Glare Assessment which will consider the potential effects of glint and glare on ground-based and aviation receptors and propose any necessary mitigation. The Glint and Glare Assessment will ensure that the Proposed Development will not have a significant impact on receptors as a result.

Heritage and Archaeology

The Site does not contain any designated heritage assets or non-designated heritage assets.

The closest Listed Buildings are Picts Cottages (Grade II) and the barn to the west of Picts Cottage (Grade II), which are situated to the north west of the Site. The heritage significance of these designated heritage assets derives principally from their physical fabric and from their mutual association to each other, which will not be altered by the Proposed Development.

The buildings sit within their own grounds consisting of a small garden plot and surrounding vegetation, and this is considered to be the key element of their setting. The buildings also sit at a lower level than the Site which means that views of the Site are only likely to be possible from the upper elevations of the Cottages, and not from the Barn at all. As a result, the immediate and key setting of the assets, which includes their enclosed grounds and the garden plot, would not be affected by the Proposed Development.

Notwithstanding this, the Proposed Layout has included a circa 70m landscaping buffer in the northwestern parcel of the Site from the shared boundary which has meant that there would be no inter-visibility between the built infrastructure and the Listed Buildings. It is therefore concluded that there will be no impact on the heritage significance of these Listed Buildings.

Further afield, but within 1km of the Site boundary, there are a number of other Listed Buildings. Given the distances between these other Listed Buildings and the intervening vegetation, there will be no impacts on the significance of these designated heritage assets.

Cowfold Conservation Area is also located circa 350m to the Site at its nearest point. This is considered a sufficient distance to ensure no impacts, particularly given the nearest parcel of land within the Site to the Conservation Area will remain undeveloped.

The planning application will be supported by a Heritage Impact Assessment to ensure no adverse impacts on any of the identified designated or non-designated heritage assets.

Flood Risk and Drainage

The majority of the Site lies within Flood Zone 1, as such the risk of flooding is low. A small section of the Site, when crossing Cowfold Stream, is located within Flood Zone 2 and 3. There will however be no infrastructure located in these areas aside from that required for access purposes.

Given the nature of the Proposed Development, it is anticipated that it will not significantly impact the flood risk within the Site or elsewhere. Nevertheless, a Flood Risk Assessment and Outline Drainage Strategy will be produced to accompany the planning application that will identify necessary mitigation measures.

Noise

The Proposed Development will be designed to ensure that any noise emitting equipment is located where it would not generate significant impacts on the occupiers of nearby residential properties. A Noise Assessment will accompany the planning application.

Transport and Access

Access to the Site is proposed from Picts Lane, and the A272 which is the main 'A Road' serving Cowfold and the surrounding area. It is proposed that construction traffic will approach the Site from the east and will therefore turn off the A272 before reaching Cowfold. This will ensure that construction traffic passing through the village will be kept to a minimum.

In addition, the Proposed Development is not expected to generate a significant increase in traffic movements overall. It is anticipated that there will be a larger number of vehicles accessing the Site throughout the construction phase, but the Proposed Development will be subject to a Construction Traffic Management Plan to limit any disruption to the local road network and ensure no significant effects. Improvements, including appropriate passing places, will be provided along the construction route where necessary and in consultation with the Local Highway Authority.

Following construction, any maintenance visits for the Proposed Development will be minimal and for maintenance purposes only, with one to two 4x4s visiting Site per month. Thus, transport effects during operation will be minimal.

Soils

Agricultural Land Classification (ALC) mapping shows the Site to fall within Grade 3 (Good to Moderate) and Grade 4 (Poor) agricultural land. Survey work will be undertaken to determine whether the Site constitutes Best and Most Versatile (BMV) land (Grades 1 – 3a).

Summary and Conclusions

In summary, it is determined that the likely effects of the Proposed Development will not be significant when considered against the selection criteria outlined in Schedule 3 of the EIA regulations. This is demonstrated through the assessment of the Proposed Development against the full list of criteria in Schedule 3, provided in Table 1.1 enclosed.

The design of the Proposed Development will take account of potential impacts and constraints to limit impacts on receptors; any environmentally sensitive areas identified through assessments will be excluded, or effective mitigation measures put in place to ensure that any impacts are not significant.

For these reasons, the Proposed Development is deemed not to be EIA Development.

The following technical information will however be submitted in support of the planning application to address the key technical issues associated within the Proposed Development:

- Planning, Design and Access Statement;
- Landscape and Visual Assessment;
- Glint and Glare Assessment;
- Ecological Assessment;
- Biodiversity Net Gain Assessment;
- Historic Environment Assessment;
- Transport Assessment;
- Agricultural Land Classification Report;
- Noise Impact Assessment; and
- Flood Risk Assessment and Surface Water Drainage Strategy.

We trust that this correspondence contains the relevant information to enable a screening opinion to be reached, however should you require any further information, please do not hesitate to be in touch.

Yours Sincerely

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