Town & Country Planning (EIA) Regulations 2017
**Secretary of State Screening Direction – Written Statement**

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| Application name: | Crowborough Training Camp, Crowborough, TN6 1UB |
| SoS case reference: | PCU/EIASCR/C1435/3377283 |
| Schedule and category of development: | Schedule 2, 10(b): Urban development. |

**Full statement of reasons as required by 5(5)(a) of the 2017 EIA Regulations including conclusions on likeliness of significant environmental effects.**

The Secretary of State for Housing, Communities and Local Government ("SSMHCLG") has considered whether the project, the proposed development at Crowborough Training Camp, is likely to have significant environmental effects. He has undertaken this screening, taking into account the criteria set out in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the Regulations"). In doing so, he considers the main matters to be addressed are those set out in Planning Practice Guidance ("PPG") where the following are indicated as main matters relevant in the consideration of development in this category: physical scale of such developments, potential increase in traffic, emissions and noise. In addition, matters relating to the National Landscape and other protected sites (e.g. biodiversity impacts – species and habitats) are also considered to be main matters in this case.

The project is considered to be Schedule 2 development as it is a type of project identified in 10(b) of the Regulations.

*Schedule 3 selection criteria for Schedule 2 development refers:*

*1 (a) – (g) regarding characteristics of development*

As sought by the Home Office ("HO"): the proposal is for temporary (up to 12 months) accommodation for up to 540 Asylum Seekers, with the installation of associated site infrastructure. The purpose is to "provide basic, safe accommodation that is deigned to be as self-sufficient as possible" (HO – Screening Request).

As the proposed use is similar to existing operations, no major redevelopment or construction is identified. For example, there is no groundworks anticipated, no existing trees affected, and no changes to onsite or local road networks.

The proposal includes onsite primary health care facilities, leisure facilities (gym), and faith rooms to reduce impacts to local services.

Works proposed to be undertaken include:

- Additional temporary internal fencing (2m in height) with privacy screening to outside perimeter and to secure out of scope buildings on site (completed).
- 10 mobile flood lights to supplement the existing lighting. Mobile units will be installed at all designated locations to illuminate walkways or high footfall areas. Lighting will be placed/operated to only illuminate areas within the operational area at Crowborough Training Camp.

- 11 CCTV cameras to provide security (completed).
- Installation of 5 mobile generators (installed, but not operational).
- Installation of modular ablution blocks.
- Additional kitchen facilities will be needed to increase capacity, and this will be provided via a PLK mobile unit.
- Some buildings may require varying degrees of refurbishment to bring up to standard (underway).
- All new additional temporary features will be placed on existing hardstanding.

Comparison to the baseline existing use may be found below:

| | Existing | Proposal |
|---|---|---|
| Total Floorspace | 12,145 sq.m including 20sq.m modular | 9,100 sq.m with remainder unused, including 356 sq.m modular |
| Height of Buildings | Single Storey | Single Storey |
| Car Parking Space | 120 | 101 |
| Total Staff | 4 plus 10 contractors | 185 |
| Number of Persons Accommodated | Up to 680 | 540 |
| Facilities | Kitchen<br>Laundry<br>Medical<br>Gym<br>Outdoor Sports | Kitchen<br>Laundry<br>Medical<br>Gym<br>Outdoor Sports<br>Prayer Room |
| Services | Healthcare<br>Food | Primary Healthcare<br>Food |
| Height of Security Fences | 2m | 2m |
| Hours of Operation | 24/7 | 24/7 |
| Security | Only army personnel, public access restricted | Only staff and asylum seekers public access restricted |
| Off-site Impact | Noise and lighting | Noise and lighting |

This EIA Screening Direction is made on the basis of the project, as described above and by the Secretary of State for the HO. Once fully operational, the proposal will have capacity for up to 540 Asylum Seekers.

Whilst the project will inevitably comprise a minor physical change to the locality, given the characteristics of the development, the receiving environment and the nature of the likely impacts, the SSMHCLG does not consider that a significant environmental effect is likely in terms of Schedule 3(1) of the Regulations regarding:

- (a) the size and design of the whole development;
- (b) cumulation with other existing development and/or approved development;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- (g) the risks to human health (for example, due to water contamination or air pollution).

*2 (a)-(c) (i) – (viii) regarding location of development*

The Project site, Crowborough Training Camp, comprises approximately 18 hectares ("ha") and is located approximately 1.6km southwest of Crowborough, in East Sussex. The site is approximately 2km southwest of Crowborough town centre. The existing and established use is a military training camp which includes an extensive training site to the west of the site.

There are two access points via 'The Warren' and an unnamed lane which connects to Uckfield Road (A26). The Warren entrance is currently blocked following a security incident.

The site is mostly surrounded by woodland, with agricultural land beyond. Immediately south is a timber yard where other employment uses are located. The urban fringe of Crowborough extends to the entrance of the Training Camp on Uckfield Road (A26).

There are no statutory or non-statutory designated sites within the boundary of the proposal. However, there are multiple environmentally designated sites within relatively close proximity:

- Ashdown Forest Site of Special Scientific Interest ("SSSI"), Special Protection Area ("SPA"), and Special Area of Conservation ("SAC") - located approximately 400m south.
- Numerous unnamed Deciduous Woodland and Lowland Heathland Priority Habitats located within 500m.

Ashdown Forest is designated due to presence of:

- Dartford Warbler
- Nightjar
- North Atlantic wet heaths
- European dry heaths
- Great Crested Newt

It is the largest single continuous block of lowland heath in south-east England. Pressures on the site include the presence of deer on woodland and under-grazing affecting land management. A

Habitats Regulations Assessment has been undertaken due to this qualifying feature. There are no other designated sites for biodiversity that are likely to be affected by the project.

The proposal site lies within the High Weald National Landscape, characterised as one of the best-preserved medieval landscapes in north-west Europe. The National Landscape is derived from the essentially rural and small-scale landscape character, rich in wildlife and cultural features. There is extensive survival of woodland and traditional mixed farming, with a high proportion of natural surfaces. Other core components include: the dense network of historic routeways, irregular fields, and dark night skies.

The nearest listed building is Grade II Warren House (off Warren Road), approximately 660m north. Other relevant Grade II Listed buildings are over 1 km east and northeast, within the built area of Crowborough (Highfield Cottage, Windlesham Manor and 1 White Collages). The nearest Conservation Area to the site is in Crowborough, located approximately 2.2km northeast. The nearest Scheduled Ancient Monument is a Medieval moated site at Pondbay, Walsh Manor in Crowborough which is located approximately 2.7km southeast of the site. There are no World Heritage Sites close to the site.

Although associated with historic Ministry of Defence uses, the repurposed buildings within the site are not considered to be of heritage interest. In terms of archaeology, negligible intrusive ground works will ensue from the proposals. Given the distance and intervening features between the site to the nearest heritage assets (listed buildings) significant impact respect of above ground heritage assets is unlikely. Due to the lack of intrusive ground works archaeology impacts are also unlikely.

There are no public rights of way ("PRoW") within 200m of the site, and the site is not currently open to the public.

The proposal site lies within the following watercourse features:

- Kent Weald Wester – Medway, Groundwater Body (current status: poor);
- Friars Gate Stream – River Catchment;
- Medway Catchment Drinking Water (Surface) - Safeguard Zone.

Brownknoll Gill (Inland River) and King's Standing Gill (Inland River) lie approximately 52m north and 980m northwest from the centre of the proposed development respectively. The site is located within Flood Risk Zone 1, indicating the lowest risk zone for flooding.

*3(a) – (h) regarding characteristics of potential impact*

The Secretary of State has considered the likely significant effects of the development on the environment in relation to the characteristics of the development and the location of the development with regard to the impact of the development on the factors specified in regulation 4(2), taking into account:

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (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; and
- (h) the possibility of effectively reducing the impact.

The Secretary of State considers the main impacts to be the following:

**Air Quality Impact**
Air emissions are likely to arise from the operation of 5 diesel generators and increased traffic movements. Best practice measures will be implemented to minimise emissions from the generators (i.e. the generators' position, operation and maintenance etc.). The technology utilises batteries and will shut off when at capacity. Based on the generators location at the centre of the site, which is as far as practicable from the accommodation buildings (approximately 60m), air quality impact is unlikely to exceed the significance threshold in EIA terms. Outside the site, any impact on sensitive receptors will be negligible.

There will be an increase to up to 342 traffic movements a day in worst-case scenarios, which is relatively small scale in comparison to the local population size and overall road network use. A green travel plan is being encouraged to minimise air emissions further (e.g., car sharing and public transport options), shuttle buses are also provided for service users to reduce the number of vehicles generated, therefore emissions from operational traffic are considered to be limited and unlikely to be significant.

**Noise impact**
There may be some noise impact from residents and the day-to-day site operation, but this is unlikely to be significant given the baseline of the existing use. The installation of 5 mobile generators and increased traffic movements are likely to give rise to noise impact on residents onsite during the operational phase.

All generators produce negligible noise as hybrid units have been selected and once the battery is charged, they are switched off completely, producing no noise. Moreover, they will be enclosed with acoustic barriers and exhaust silencers to further lower the noise impact. The generators are also positioned away from the accommodation buildings as far as practicable (approximately 60m). Through careful selection of plant, use of appropriate noise mitigation measures and maintaining sufficient separation distance from any noise sensitive receivers, it is reasonable to assume that noise impact during daytime and nighttime periods are unlikely to be significant.

The increased number of traffic movements of up to 342 a day at worst-case scenario remains relatively small scale in comparison to the local population size and overall road network use. The site will be stood up gradually and much lesser impacts can be expected in the initial period of operation. Given also the existing background noise from the A26 and the encouraged sustainable travel options, operational traffic noise impact on any noise sensitive receptors is considered unlikely to be significant.

**Ecological Impact**

As proposed intensive construction works are minimal and short in duration, there is no foreseeable significant construction impacts on identified ecological sites. No areas of Priority Habitat or otherwise designated sites will be lost or harmed due to the proposal.

While the site is in proximity to identified designated sites, including Ashdown Forest, there are only limited connecting features identifiable. All works will be undertaken with regard to best practice. (i.e. downlight positioning, design/specification/hours of operation etc). Storage of materials and equipment will be sited at distance from sensitive ecological receptors.

However, one connecting impact may present through light pollution. Ashdown Forest is designated for bird species such as Nightjar and any additional lighting introduced may affect these mobile species and any functionally linked habitat. However, when compared to the baseline position, there is not forecast to be a significant increase in lighting.

The proposal does not impact the identified pressures on Ashdown Forest, or any other reason why it is designated as an SSSI, SAC, or SPA. Given the nature of works, and the employment of pollution control measures, there is considered to be a negligible risk of direct or indirect impacts.

Due to the nature of the proposal including access to recreation on and off site, any off-site recreational impacts on Ashdown Forest or the Priority Habitats in the locality of the site are likely to be negligible.

The Secretary of State consulted Natural England ("NE") for the purpose of the Screening Direction. NE concluded "there are no likely significant effects on statutorily designated nature conservation sites".

While Ashdown Forrest and other Priority Habitats have been identified nearby, only one connecting ecological impact has been identified: lighting. As works will adhere to best practice, be situated away from sensitive receptors where possible, and do not result in a significant increase in lighting above baseline conditions, significant effects are not considered likely in this regard.

Once accounting for the compensation measures, the proposal is unlikely to result in significant effects with regard to nearby sites designated for ecological value. This conclusion is corroborated by NE.

**Landscape Impact**

It is considered that the proposal site lies within a highly sensitive landscape of cultural, historic, and environmental importance: High Weald National Landscape. However, the proposed development remains largely similar to the current site operations in terms of landscape impact. Furthermore, equipment, such as the proposed generators, are temporary instalments and therefore no long-term changes to the landscape are anticipated to the extent that they are significant in EIA terms.

On the core components of the High Weald National Landscape, the proposal may impact the dark night skies. Ten mobile flood lights are proposed to supplement the existing baseline lighting. Mobile flood lights will be installed to illuminate walkways or high footfall areas. However, lighting will be operated to only illuminate areas within the proposal site. All works will be undertaken with regard to the best practice measures (i.e. downlight positioning, design/specification/hours of

operation etc). The Secretary of State concludes, given the baseline position and mitigation measures provided, the proposal's impact on the dark skies of the High Weald National Landscape will be limited in scope and magnitude.

There are no other core features of the National Landscape which appear to be significantly affected by the proposal given the visually contained nature of the site and its location on the urban fringe of Crowborough.

The Secretary of State consulted NE for the purpose of the Screening Direction. NE concluded "there are no likely significant effects on statutorily designated... landscapes".

The only identified effect of the proposal on the identified National Landscape relates to lighting impact on the dark skies. Following the mitigation measures outlined and the baseline condition, there is no significant effect anticipated in this regard. There are no other impacts during any phase of the development which are anticipated to give rise to significant effects on the National Landscape. This conclusion is corroborated by NE.

**Highways Impact**

There are two access points to the south of the site, both form the A26. One is via 'The Warren' (and closed off following a security breach) and the other an unnamed lane (and is the only current access point). Both connect south-eastwards to Uckfield Road (A26), Crowborough itself, and the wider road network. There is a bus stop at the Uckfield Road junction for journeys in both directions.

A series of internal roads and footpaths link the buildings onsite. A number of further emergency access points are available to use, albeit untarmacked. The traffic impact from the current operational training use is low. Local observation by the HO (e.g. from staff visiting the site including at peak am times) is that the local network currently operates effectively and within capacity. Highways England shows no congestion notices for the A26, and the road infrastructure was upgraded in March 2025. Some congestion is apparent at peak times (e.g. the traffic lights when nearing Crowborough town centre). However, given the site will be stood up gradually, much lesser impacts can be expected in the initial period the site is operating.

There will be some construction works associated with refurbishment and the repurposing of existing uses on site. The completion of the proposal will also involve very limited works associated with the installation of additional site infrastructure over a short timeframe in which a secondary entrance may be used. No change is proposed to the onsite or local road network including the access points. Some of this work is already complete.

During operation, Service Users will use a shuttlebus for journeys away from Crowborough. Additional staff are needed when compared to existing baseline levels. Some staff will commute during the busiest morning period, anticipated between 7 and 9am. There is forecast to be around 260 staff travel movements in any given 24-hr period. These changes (i.e. up to a maximum of 342 vehicular movements in a worst-case scenario) will be a relatively large increase in the context of the existing operational baseline but modest in the context of the effectively operation road network. Further, the site will at times be operating below capacity, particularly for the initial period of operation. Moreover, staff are encouraged to car share and use public transport, with bus timetables displayed in staff areas. Working hours will be staggered to reduce traffic impacts, and

service users will not have access to vehicles. While there may be some adverse impact on the local highway network, this is not considered significant in EIA terms.

The proposal will lead to a relatively large increase traffic particularly at certain times when compared to current baseline operations. However, given the measures proposed, the site's variable capacity, and the temporary nature of the development, the proposal is not likely to result in any significant changes to traffic movements in the immediate locality or wider road network to the extent EIA is required.

**Health and Community Impact**

The proposal may affect the health of Service Users, employees, and the local population. Factors such as, but not limited to, noise, air quality, and light may also result in differential and detrimental health effects on those who share a protected characteristic, including the elderly, the young, those with certain disabilities, and during pregnancy and maternity. Consideration to these effects have been given through the Secretary of State's assessment. The accommodation is for adults only; therefore, certain protected characteristics won't apply to Service Users.

The project will provide accommodation for up to 540 residents and operate with 185 staff. The site will be stood up gradually and much lesser impacts can be expected in the initial period the site is operating.

There are potential effects on the existing local population, anticipated occupants, and staff with regard to their physical and mental health, and access to healthcare.

The proposal may give rise to anxiety amongst local residents which may be adversely affected by protestors/demonstrators or riots.

*Construction*

Construction may result in potential impacts on determinants of human health, specifically for the existing population. Impacts may include air pollution, noise pollution, transport delays when accessing healthcare, risk of injuries, reduced access for leisure, and soil and water pollution. When compared to the baseline, and given the proposal's limited construction works, it is not anticipated that there will be a significant adverse effect and some of these works are complete. This assessment is inclusive of consideration of the residual construction effects on human health with respect to various populations, including wider groups, children, elderly people, disabled persons, and low-income groups.

*Demographic change*

The proposal will result in a population of up to 540 Service Users at any one time in the period of occupation. The site is relatively self-contained; however, the project is not a detention centre, and service users are free to leave the site, but are requested to sign in and out when they leave and return to ensure safety. The baseline position has accommodation for up to 680 people. Therefore, the population may be modestly reduced and is not considered significant.

*Community relations*

There are no identified community assets located on or around the site. The site management team hold responsibility for liaison and communication with the local community, including businesses. The community will be able to ask questions directly or during meetings and any issues raised will be appropriately addressed. With this mitigation, there is no foreseeable significant effect on community relations.

*Health of service users*

The proposal involves asylum seekers; this may lead to a disproportionate number of people with increased mental or physical needs compared to the general population. Healthcare is provided through the onsite Medical Centre, which is open Monday to Friday between 10:00 and 18:00. There is also an on-site nurse which acts as a GP outreach service. There is a daily mental health support group that is available as a walk-in service. If the medical centre is closed, a welfare team is available.

Further mitigation measures to ensure there are no significant adverse effects on the health of service users include: initial medical screening on arrival, immunisation against diseases, and confidential health advice.

*Suitable accommodation*

The accommodation is expected to comply with the relevant statutory instruments such as: Building Regulations 2010, Regulatory Reform (Fire Safety) Order 2005, Electricity at Work Regulations 1989, Section 326 of Housing Act 1985, Health and Safety and Work Act 1974, Water Supply (Water Quality) Regulations 2016, and Water Supply (Water Fittings) Regulations 1999.

It would be reasonable to expect that the accommodation will reflect modern accommodation and building regulation standards.

*Crime and the fear of crime*

Operational areas will be secured against public access, including appropriate security fencing and CCTV.

There will be consultation with local stakeholders, such as the Local Council and police, on the local security requirements of the site operation.

There is no previous evidence to indicate that asylum seeker accommodation results in a perceived or actual increase in crime, or fear of crime including with regards to impacts on the health of people living nearby.

*Health of the existing population*

While there are changes to the local population in regard to end users of the site, there are no concentrated residential areas in close proximity with the closest residences around 300m from the site. Accordingly, the two identifiable potential impacts to the existing population concern anxiety about the project, and transport impacts.

Regarding project anxiety, as discussed in community relations, the site management team hold responsibility for liaison and communication with the local community. This forum will provide a chance to address anxieties and produce meaningful mitigations should they be identified as necessary.

Regarding transport impacts, impact will be minimised by the applicant through the use of green travel policies including car sharing, shuttle buses, and public transport. Additionally, consideration of working shift patterns to minimise local impact will arise. Ultimately the increased transport impacts are relatively minor given also the existing use and mitigation measures will ensure this impact is softened below a point of significance.

*Access by service users to other services and facilities*
The site will have multiple facilities including: primary health care facilities, a gym, outdoor sports, kitchens, laundry, and faith-rooms. Users are non-detained and will therefore also be able to access additional local facilities but given the onsite offer any such use will likely be limited.

*Fire safety*
The proposal is expected to comply with all relevant Regulations, including the Fire Safety Act 2021. The site service management will ensure fire safety through a fire risk management plan. Measures to address risk include:

- Fire safety systems and equipment to detect and respond to fires;
- Designated fire marshals in the event of a fire who are trained with portable firefighting appliances;
- Fire risk assessments for all accommodation and buildings utilised across the site;
- Regular reviews of action plans;
- Regular fire drills and fire alarm tests;
- Evacuation procedures covered as part of site induction, with procedure displayed on fire exit doors in multiple languages.

*Security and protests*
It is possible that protestors outside the Site present a risk to the local population and service users. The Home Office and the service provider have established procedures for managing protestors and maintain regular engagement with Sussex Police to ensure coordinated responses. The site benefits from a secure perimeter fence, originally designed as part of the former barracks, which restricts unauthorised access, and this has already been improved with the addition of secondary Hera fencing together with privacy screening. This is to be supported by 24/7 on-site security and site wide CCTV. The service provider delivers safety briefings to all Service Users during induction which are used on other asylum accommodation sites. This outlines available support services and signposts service users to relevant local organisations. Guidance on how to remain safe during any protest activity, including reporting mechanisms, is routinely issued and made accessible. There are no residual significant effects anticipated with regard to security and protests.

*Highway safety*
With regard to transportation within and surrounding the site, there is no data to suggest that there are any underlying highway issues contributing to road traffic accidents. There may be some limited road safety risks. This is due to the increased numbers of vehicles entering and exiting from the junction to the A26 and Service Users exiting or entering the site on foot. A footpath runs along the A26 for those heading to or from Crowborough.

*Health and Community Impact Conclusion*

For the reasons set out above, including the identified mitigations, it is considered that there are no likely significant effects in this regard.

**Other Matters**

Given the mitigations proposed, and having considered all available information, there are no other issues amongst those not specifically addressed above which indicate a likelihood of there being significant environmental effects from this proposal.

As set out in PPG, each proposal should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. PPG indicates that only existing or approved applications ought to be considered. An indicative search of the surrounding area by the HO's consultants has not identified any significant planning applications nearby within or in the vicinity of Crowborough.

It is intended the site will return to its former use once the permitted period expires. Consideration of cumulative impact is in the context of the baseline of an operational MoD training camp. The closest development is Warren Grove which nears completion and is small scale, other residential development and educational development (at Grove School) is also apparent in the vicinity. Construction traffic during the operation of the site is the most likely cause of any cumulative impact (i.e. when coinciding with the peak operation of the site). Some cumulative impact alongside the Warren Grove development when occupied is also likely.

Some impact interactions between transport and other nearby land uses are possible, particularly during the peak AM period when staff arrive. Assessment has not identified any development that may impact significantly in cumulation alongside the project, noting Warren Grove is largely complete. Overall, it is not considered that there will be likely significant effects in this regard.

**Conclusions**

The SSMHCLG has had regard to the characteristics of the development, the location of the development and the types and characteristics of potential impacts as set out above. Further, the SSMHCLG has had due regard to the impact on persons with protected characteristics under the Equality Act 2010. For the reasons set out above, he has concluded that in the circumstances of this case, there are unlikely to be significant effects. As such, the Project is not considered to be EIA Development for the purposes of regulation 5(3) of the EIA Regulations.

This direction does not affect any duties of the requestor under other legislation, including The Conservation of Habitats and Species Regulations 2017.

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| Is an Environmental Statement required? | No |

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| Name | Planning Casework Unit |
| Date | 12 January 2026 |