Homes England

The Housing and Regeneration Agency

West of Ifield, Crawley
Environmental Statement: Volume 1: Main Report

Chapters 1 to 5

WOI-HPA-DOC-ESV1-01
Version 1 - Planning submission

July 2025

INTRODUCTION

1.1 Introduction

1.1.1 Homes England (the 'Applicant') intends to submit a hybrid planning application (part outline and part full planning application) for a phased, mixed-use development (the 'Proposed Development') at land west of Ifield. The area to be redeveloped is shown within the planning application boundary plan (drawing ref. WOI-HPA-PLAN-PAB-01) and as depicted in Figure 1.1 (the 'Site'). The hybrid planning application comprises land within Horsham District Council's (HDC) administrative area.

1.1.2 This Environmental Statement (ES) has been prepared on behalf of Homes England, in accordance with the statutory procedures set out in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017[1] (the 'EIA Regulations').

1.1.3 The ES relates to the Proposed Development of the Site which is 171.29 hectare(ha) in size of which:

- 29. 36ha within the full element;
- 145.52 ha within the outline element;
- An area of 3.37 ha of overlap between the full and outline elements.

1.1.4 The Proposed Development comprises a phased, mixed-use development for which the Applicant intends to submit a hybrid planning application. The full element comprises Phase 1 of the Proposed Development which will include the infrastructure required for the delivery of the secondary school, including the first phase of the Crawley Western Multi-Modal Corridor (CWMMC) (a new road with a dedicated bus lane and regular traffic lane in each direction), to form a connection from Charlwood Road to the east and the primary access route to the Proposed Development.

1.1.5 The outline element of the Proposed Development comprises mixed-use development of up to 3,000 homes, a Neighbourhood Centre and associated community facilities, a primary school and a secondary school, employment uses, public open space and multi-functional green space, and allowance for key infrastructure and utilities.

1.1.6 Further details on the Proposed Development, the Description of Development and the proposed land uses are set out within the Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01) and the Design and Access Statement (WOI-HPA-DOC-DAS-01).

1.1.7 The Applicant recognises that the Proposed Development falls within Schedule 2, Paragraph 10b of the EIA Regulations as an *'urban development project'* which, owing to its nature, scale and location, is likely to give rise to significant effects on the environment. Therefore an environmental impact assessment (EIA) is being undertaken for the Proposed Development, of which the ES forms part (the findings of the ES are presented within this report).

1.1.8 EIA is a formal process in which the likely significant effects of certain types of development projects on the environment are identified, assessed and reported upon. For certain types of development, the process must be followed in order for such effects to be taken into account before a decision is made on whether planning permission should be granted.

1.1.9 This ES presents the results of the EIA that has been undertaken of the Proposed Development. In accordance with the EIA Regulations, the ES reports on the likely significant environmental effects of the Proposed Development during the demolition and construction stage, as well as during the subsequent completed development stage.

[1] Secretary of State, 2017. Town and Country Planning (Environmental Impact Assessment) Regulations 2017, London, HMSO.

1.1.10 The ES has taken into account the mitigation measures that are being proposed by the Applicant, including those measures that have been integrated into the planning and design of the Proposed Development to avoid and, where avoidance is not possible, to off-set and/or reduce likely significant adverse effects. The assessment then evaluates the significance of the residual effects. All mitigation measures are set out in the individual relevant technical chapter.

1.1.11 The ES has been prepared by Ramboll UK Limited ('Ramboll') and a team of technical specialists in accordance with best practice guidelines including, the Institute of Environmental Management and Assessment (IEMA) Quality Mark scheme. The ES team, in addition to the Applicant's wider design and planning team, is presented in Table 1-2, along with the respective disciplines.

1.1.12 The ES comprises the following:

- Non-Technical Summary (NTS);
- Volume 1: Main Environmental Statement (this document); and
- Volume 2: Technical Appendices.

1.1.13 This chapter is accompanied by the following technical appendices within ES Volume 2:

- ES Volume 2 Technical Appendix 1.1: IEMA Quality Mark Checklist; and
- ES Volume 2 Technical Appendix 1.2: Regulation 18(5)(b) Statement.

1.2 Development Context

Site Location and Context

1.2.1 The Site is located on land to the west of Ifield near Crawley in West Sussex (see Figure 1.1), centred approximately at National Grid Reference TQ 23679 36673.

1.2.2 The Site is predominantly occupied by a mixture of arable and pastoral fields and includes the Ifield Golf Course and Country Club (hereafter referred to as the 'golf course') in the south. The River Mole is present across the northern part of the Site and flows from south-west to north-east.

1.2.3 Current access to the Site is via Charlwood Road in the north and Rusper Road to the south. The M23 motorway, which connects London with the south of England, is located approximately 3.7km to the south-east.

1.2.4 The surrounding area is occupied by agricultural land uses, light industrial, commercial and residential land-uses. Gatwick airport is located approximately 1km to the north-east, beyond which lies the town of Horley.

1.2.5 An extensive network of public footpaths provides pedestrian access and recreation across the rural area, both within and the outside the Site, and includes good connections with the urban area. The surrounding land supports a variety of individual residential houses and farmhouses.

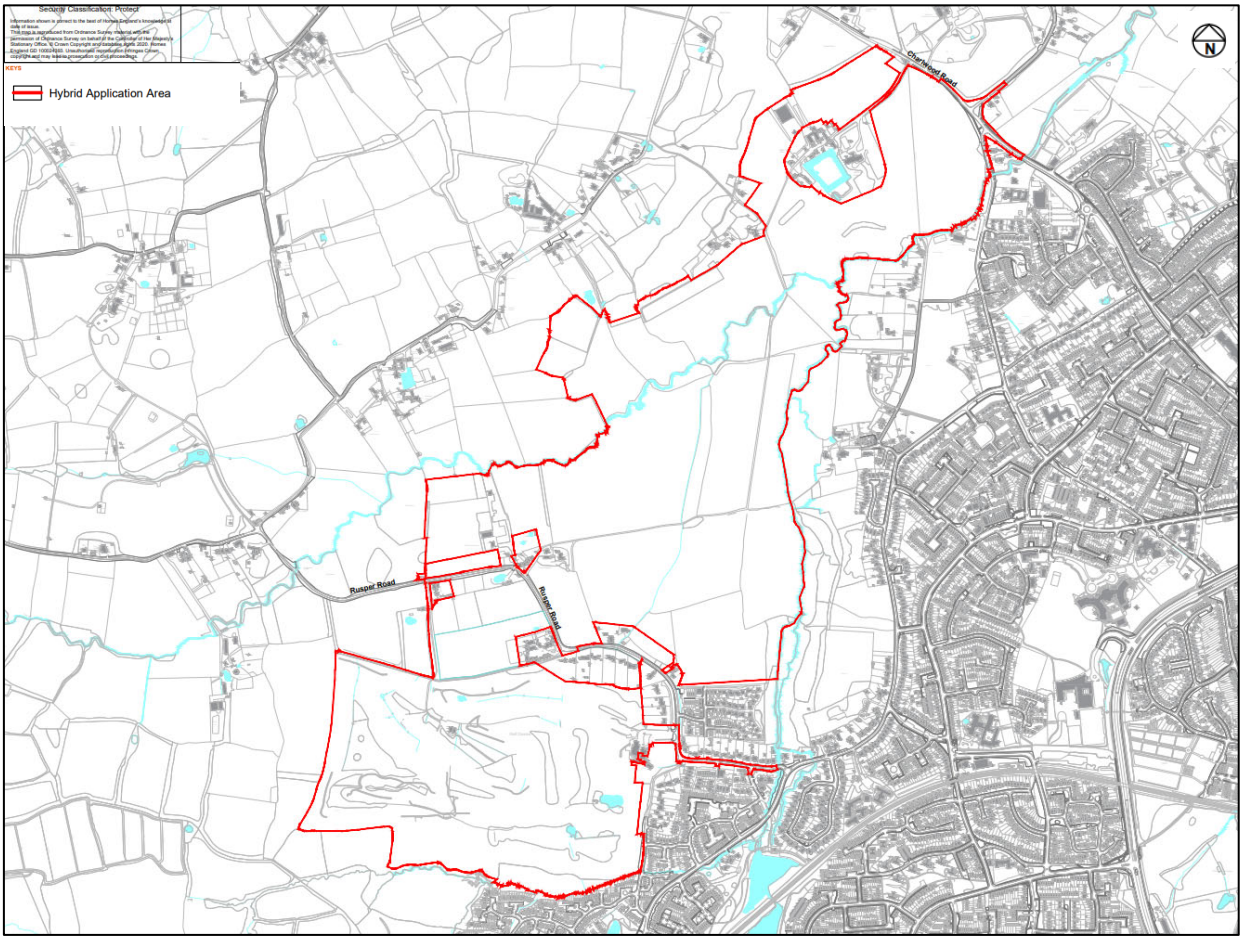


Figure 1.1: Site Location (drawing ref. WOI-HPA-PLAN-LOC-01)

Site Description

1.2.6 The Site topography is generally low-lying, with ridges to the south and west. The first of these ridges passes through the southern part of the Site in an approximate east-west alignment and this rises up from 76m Above Ordnance Datum (AOD) in the south-west to approximately 85m AOD at Hyde Hill. The second ridge is located approximately 1km to the north-west at Russ Hill. It is orientated in an approximate south-west to north-east alignment which rises up from 68m AOD on Site and extends up to 100m AOD at Russ Hill. The low-lying land between these two ridges lies at approximately 60-70m AOD and is dissected by the narrow watercourses of Ifield Brook and the River Mole.

1.2.7 There is a discrete off-Site parcel of land that is situated within the northern portion of the Site (the 'Island'). This comprises the Ifield Court Hotel (covering an area of approximately 1ha), a medieval moat at Ifield Court, a scheduled monument and some agricultural and residential buildings.

1.2.8 An area to the east of the Site is owned by the Applicant and occupied by Ifield Brook Wood and Meadows, which adjoins a wooded area and extends into an area of ancient woodland.

1.3 Environmental Considerations

1.3.1 Figure 1.2 depicts the location of the environmental constraints within approximately 1km of the Site.

1.3.2 The surface water bodies River Mole, Ifield Brook, and Baldhorns Brook are present on-Site. On-Site there are areas of High, Medium, and Low surface water (pluvial) flood risks affecting the eastern areas of the Site. For groundwater flood risk, groundwater levels are shown to be close to ground level within the shallow bedrock close to ground level or slightly above ground level (artesian) at depth.

1.3.3 The vast majority of the Site is within a fluvial Flood Zone 1 (< 0.1% annual chance of flooding), with areas of fluvial Flood Zone 2 (0.1% annual chance of flooding) and fluvial Flood Zone 3 (1% annual chance of flooding) associated with the Ifield Brook, which runs in a northerly direction within the east side of the Site, and the River Mole, which runs through the northern portion of the Site, running in a south-west to north-east direction. There is also a potential pluvial flow pathway associated with a surface water drain running through the centre of the Site, although EA mapping is considered to overestimate the risk in this area. This is further detailed in ES Volume 1 Chapter 14: Surface Water and ES Volume 2 Technical Appendix 14.1 Flood Risk Assessment (FRA).

1.3.4 An area to the east of the Site is occupied by Ifield Brook Wood and Meadows, which adjoins a wooded area and extends into an area of ancient woodland. Ifield Brook Wood and Meadows is designated as a Local Wildlife Site (LWS) and a Site of Nature Conservation Importance (SNCI). The majority of this area is outside of the Site, but within the control of Homes England and will be retained as part of the proposals.

1.3.5 A proposed pedestrian / cycle link through Ifield Meadows to the east of the Site forms part of the off-site mitigation package for the Proposed Development. The proposed east-west pedestrian / cycle connection which will run across the southern part of Ifield Meadows. The proposed ped/cycle link is located outside of the planning application red line on land within Crawley Borough Council (CBC). The link will be secured pursuant to a specific Section 106 obligation. Ifield Meadows is within Homes England's ownership, as shown in Land Ownership Plan (WOI-HPA-PLAN-BLU-01), and therefore its delivery can be secured via an obligation associated with the hybrid planning application.

1.3.6 While there are no statutory ecological or landscape designations on the Site, it has biodiversity value due to the presence of notable habitats, including trees, tree groups, semi-natural grassland areas and hedgerows, as well as the potential to support protected and notable species. The Phase 1 habitat survey identified on-Site habitats and informed a series of surveys which are submitted as part of the planning application.

1.3.7 There is approximately 90 hectares (ha) of agricultural land within the boundary of the Site which is Subgrade 3b. This is not considered to be best and most versatile (BMV) land (which comprises Grade 1,2 and 3a).

1.3.8 HDC have declared two air quality management areas (AQMA) due to exceedances of the annual mean nitrogen dioxide ($NO_{2)}$ National Air Quality Objective (NAQO). However, the Site is not located in an AQMA; the closest AQMA to the Site is located in the administrative area of Crawley Borough Council (CBC) (Hazelwick Air Quality Management Area) which is located approximately 1.8 km east of the Site.

1.3.9 Ifield Village Conservation Area, is located directly east of the Site. The conservation area contains the Grade I Listed Parish Church of St. Margaret, located approximately 170m east of the Site boundary. Seven locally listed building, including the Barn Theatre, is located within Ifield Village Conservation Area but are outside the Site. Within the Site boundary is Ifield Golf Club Sports Hall, Ifield Golf Club Dormy House and Drughorn Memorial. Additionally within the Site is Ifield Medieval Park and six Archaeological Character Areas.

1.3.10 The Site, in particularly the northern portion of the Site, is impacted by noise associated with Gatwick Airport.

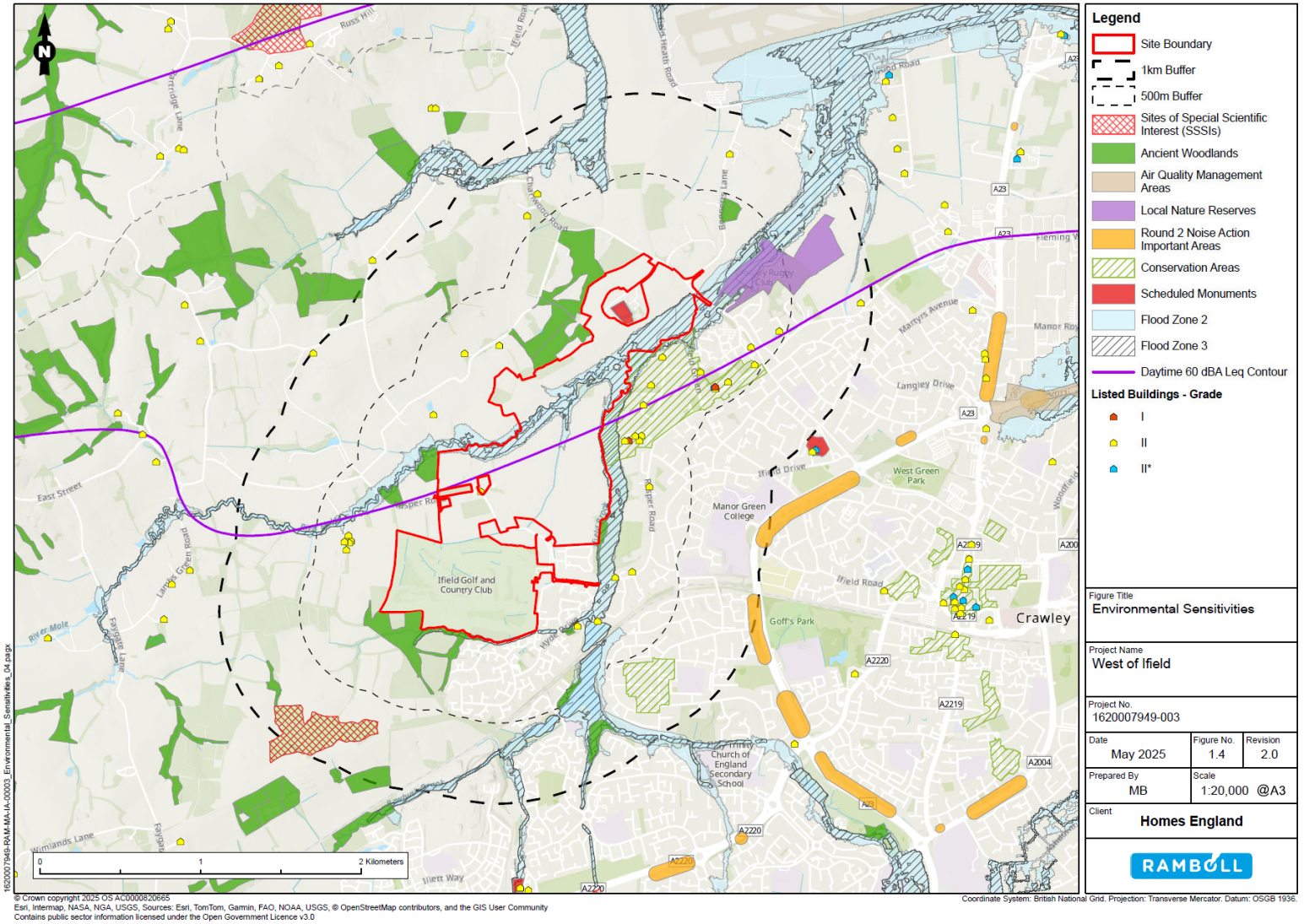


Figure 1.2: Environmental Sensitivities with a Study Area Surrounding the Site of 500m and 1km

1.4 Planning Context

1.4.1 In respect of the application, the Proposed Development falls within Schedule 2, Paragraph 10b of the EIA Regulations[1] as an *'urban development project'*.

1.4.2 It is necessary to consider the Proposed Development against relevant policies and guidance at national, regional and local levels. At the national level, planning policy is contained within the National Planning Policy Framework (NPPF)[2].

1.4.3 The NPPF sets out the Government's planning policies for England, and has recently been updated in December 2024, with a minor amendment in February 2025[3]. The recently revised NPPF sets out the Government's objective of significantly boosting the supply of homes, stating that it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed.

1.4.4 At the heart of the NPPF, as set out in paragraph 10, is the presumption in favour of sustainable development, and plans and decisions should apply a presumption in favour of sustainable development (paragraph 11). The NPPF is supported by on-line Planning Practice Guidance (PPG)[4] and both are material planning considerations.

1.4.5 Within each chapter, the technical lead has identified all policy and guidance relevant to their chapter, with the below providing guidance on the application of the core statutory development plan documents.

Statutory Development Plan Policy

1.4.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the Statutory Development Plan unless material consideration indicates otherwise.

1.4.7 The Site lies within the administrative area of HDC in West Sussex. Therefore, the statutory development plan for the Site comprises the following:

- Horsham District Planning Framework (adopted November 2015)[5];
- West Sussex County Council Joint Minerals Local Plan and Waste Local Plan (adopted 2018, Partial Review March 2021)[6];
- The Rusper Neighbourhood Plan (made 2021)[7]; and

1.4.8 West Sussex Waste Local Plan (adopted in April 2014, and confirmed as up to date in 2024).

1.4.9 In addition, the following are key material planning considerations that should be considered alongside the Development Plan, including:

- National Planning Policy Framework (NPPF) (2024)[8];
- Planning Practice Guidance (PPG) (as amended)[9];
- Horsham District Council's Facilitating Appropriate Development document (October 2022)[10];
- Emerging Horsham District Local plan evidence base; and

[2] Department for Communities and Local Government, Dec 2024. The National Planning Policy Framework. London. HMSO.
[3] Last updated in February 2025.
[4] HM Government, Planning Practice Guidance Collection. Available online at: https://www.gov.uk/government/collections/planning-practice-guidance
[5] Horsham District Council (2015); Horsham District Planning Framework. Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf
[6] West Sussex County Council (2018, Partial Review March 2021). Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf
[7] Rusper Parish Council (2021); Rusper Neighbourhood Plan 2018-2031. Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0011/108488/Rusper_Neighbourhood_Plan_2020_Final-1.pdf
[8] Ministry of Housing, Communities & Local Government (2024); National Planning Policy Framework. Minor amendment in February 2025. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
[9] GOV.UK (2024); Planning Practice Guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance
[10] Horsham District Council (2022); Facilitating Appropriate Development. Available at: https://www.horsham.gov.uk/__data/assets/pdf_file/0007/119527/Facilitating-Appropriate-Development.pdf

- West Sussex County Council's Guidance on Parking at New Developments (September 2020)[11].

1.4.10 HDC have been preparing a new Local Plan. The new Horsham District Local Plan 2023 – 2040 set out planning policies and proposals to guidance development in the district up to 2040.

1.4.11 In July 2024, HDC formally submitted the 'Horsham District Local Plan 2023 – 2040 Regulation 19' document (dated January 2024) and supporting documents and evidence base to the Planning Inspectorate for Examination, which included a strategic site allocation for the Site (Strategic Policy HA2 'Land West of Ifield') which allocated the Site for a comprehensive new neighbourhood to deliver approximately 3,000 new homes, of which at least 1,600 new homes will be delivered in the Plan period (i.e. up to 2040).

1.4.12 The Examination hearings commenced in December 2024, however, the Examination was delayed following the Inspector raising significant concerns about the soundness and legal compliance of the Local Plan, and on 4th April 2024, the Inspector recommended that the draft Local Plan should be withdrawn.

1.4.13 On this basis, although subject to formal withdrawal which requires HDC's Full Council sign off, limited, if any weight is applied to the Horsham District Local Plan 2023 – 2040 Regulation 19 document.

1.4.14 However, elements of supporting evidence base which provide evidence of up-to-date need act as a material consideration in the determination of this hybrid planning application. Where relevant, these are referred to within the Planning Statement and the submission documents.

1.4.15 Further details on policy and policy weighting for determination are set out in the Planning Statement which has been submitted to support the planning application (WOI-HPA-DOC-PS-01).

1.5 Planning History

1.5.1 In terms of planning history, it is considered that there are no directly relevant planning applications submitted within the application boundary or adjacent to it such that it would influence the determination of the planning application.

1.6 Applicant

1.6.1 The application is submitted to HDC on behalf the following entity:

Homes England
Newcastle office
2nd floor
The Lumen
St James Boulevard
Newcastle Helix
Newcastle upon Tyne
NE4 5BZ

[11] West Sussex County Council (2020); Guidance on Parking at New Developments. Available at: https://www.westsussex.gov.uk/media/1847/guidance_parking_res_dev.pdf

1.7 Project Team

1.7.1 The Applicant has appointed a design team to assist in the development of the application and has concurrently appointed an ES team to prepare the ES in accordance with Regulation 18(5)(a) of the EIA Regulations. The team members and their respective roles are presented in Table 1-1.

Table 1-1: Design and ES Team

Role	Company
ES Project Manager and Co-ordinator	Ramboll
Overall Project Manager	Turner & Townsend
Planner / Masterplanner	Prior + Partners
Architect	Macreanor Lavington (MLA)
Noise and Vibration	Ramboll
Biodiversity / BNG	Ramboll
Cultural Heritage	PCA Heritage
Surface Water and Flood Risk	Ramboll
Groundwater and Water Neutrality	WSP
Socio-economics and Health	Ramboll with inputs from SQW
Landscape and Visual	Gillespies
Climate Change	Ramboll
Air Quality	Ramboll
Traffic and Transport	Steer
Arboriculture	TMA
Waste	Ramboll
Soils / Agriculture	Askew Land and Soil
Health Impact	Ramboll

1.8 Environmental Statement

Environmental Statement Structure

1.8.1 The ES comprises the following documents:

- Non-Technical Summary
- Volume 1: Main Environmental Statement
  - Introduction
  - EIA Process and ES Methodology
  - Alternatives and Design Evolution
  - Proposed Development Description
  - Demolition and Construction Description
  - Soil and Agriculture
  - Air Quality
  - Biodiversity
  - Climate

  - Cultural Heritage
  - Landscape and Visual Impact
  - Noise and Vibration
  - Socio-economics and Health
  - Water Environment and Flood Risk
  - Transport
  - Cumulative Effects
  - Summary of Residual Effects
- Volume 2: Technical Appendices
- Glossary of Terms and Abbreviations

Environmental Statement Content

1.8.2 The required content of the ES is set out in Schedule 4 of the EIA Regulations[1]. Table 1-2 presents the requirements of the EIA Regulations and indicates where in this ES the requirements have been met considering the scope of the ES.

Table 1-2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)

Required Information		Chapter/Section of ES
1	A description of the development, including in particular: • a description of the location of the Proposed Development; • a description of the physical characteristics of the Proposed Development, including, where relevant, requisite demolition works, and the land-use requirements during the operation stage; • a description of the main characteristics of the operational phase of the Proposed Development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used; an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the operation stage.	ES Chapter 1: Introduction, Volume 1 ES Chapter 4: Proposed Development Description, Volume 1 ES Chapter 5: Demolition and Construction Description, Volume 1
2	A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the Applicant, which are relevant to the Proposed Development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	ES Chapter 3: Alternatives and Design Evolution, Volume 1
3	A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the Proposed Development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	ES Chapter 3: Alternatives and Design Evolution, Volume 1
4	A description of the factors specified in Regulation 4(2) likely to be significantly affected by the Proposed Development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	ES Chapters 6-15, Volume 1,

Table 1-2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)		
Required Information		**Chapter/Section of ES**
5	A description of the likely significant effects of the Proposed Development on the environment resulting from, *inter alia*: • the construction and existence of the development including, where relevant, demolition works; • the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources; • the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste; • the risks to human health, cultural heritage or the environment (for example due to accidents or disasters); • the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources; • the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change; and • the technologies and the substances used. The description of the likely significant effects on the factors specified in Regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. The description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the Proposed Development, including in particular those established under Council Directive 92/43/EEC and Directive 2009/147/EC.	ES Chapters 4-17, Volume 1,
6	A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	ES Chapters 6-15 Volume 1
7	A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). The description should explain the extent to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	ES Chapter 5: Demolition and Construction Description, Volume 1 Mitigation sections of ES Chapters 6-17, Volume 1
8	A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Relevant information available and obtained through risk assessments pursuant to EU legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or UK environmental assessments may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment	Major Accidents and Disasters as a topic chapter was scoped out of the ES, as included in the Scoping Report issued 21st May 2024. Where necessary, flood risk, adverse weather or transport issues associated with major events affecting

Table 1-2: Information Required in an Environmental Statement (Schedule 4 of EIA Regulations)		
Required Information		**Chapter/Section of ES**
	and details of the preparedness for and proposed response to such emergencies.	the operation of Gatwick north of the Site have been addressed in respective sections of the ES (in ES Volume 1, Chapters 9, 14 and 15).
9	A non-technical summary of the information provided under 1 to 8 above.	Non-Technical Summary
10	A reference list detailing the sources used for the descriptions and assessments included in the ES.	ES Chapters 1-17, ES Volume 1 (references provide throughout).

Environmental Statement Good Practice

1.8.3 As with EIA, good practice in the preparation of the ES is defined in a number of sources, with more specific issues covered by ES review checklists. Many of these checklists are very detailed and go to some length. In terms of widely applicable and practical guidance, the Institute of Environmental Management and Assessment (IEMA) Quality Mark indicator check has been referenced in undertaking the EIA and in producing this ES.

1.8.4 Ramboll is a Registrant on the IEMA Quality Mark. Accordingly, as part of Ramboll's Quality Assurance procedures and Quality Mark Commitments, the EIA has been undertaken to meet the Quality Mark Commitments as set out in ES Volume 2 Technical Appendix 1.1.

1.8.5 As required by Regulation 18(5)(b) of the EIA Regulations, ES Volume 2 Technical Appendix 1.2 presents a statement from the Applicant outlining the relevant expertise or qualifications of the competent experts that have prepared this ES.

2 EIA PROCESS AND ES METHODOLOGY

2.1 Introduction

2.1.1 This chapter of the ES sets out the general approach to the process and methodology that has been adopted for the ES. It describes the legislative framework in which the EIA process is set out and identifies the key guidance that has been considered. It provides details of the screening, scoping and consultation process to identify the key environmental topics for inclusion in the ES.

2.1.2 While the overall approach and methodology to the ES are described in this chapter, further detail on how the methodology was tailored to each technical aspect of the ES is presented in the relevant technical assessment chapters of the ES.

2.2 Environmental Impact Assessment

2.2.1 Environmental Impact Assessment (EIA) is a process that is required to be followed for certain public and private development projects to ensure that the decision-maker, when deciding whether to grant planning permission, does so with full knowledge of a project's likely significant effects and takes this into account in the decision-making process. The EIA process also sets out consultation, publication and notification requirements to ensure that members of the public and statutory consultees are given appropriate opportunities to participate in decision making procedures.

2.2.2 The EIA process requires the identification and assessment of all likely significant environmental effects, whether beneficial or adverse, of certain public and private development projects. Proposed developments to which EIA is applied are those listed in Schedule 1 of the EIA Regulations and those listed in Schedule 2 of the EIA Regulations where they are likely to have significant effects on the environment by virtue of factors such as their nature, size or location.

2.2.3 The Town and Country Planning (Environmental Impact Assessment) Regulations, 2017[1] (the 'EIA Regulations') set out the process of EIA that is required to be followed in the case of a proposed development. The EIA process consists of:

- The preparation of an ES by the applicant that includes at least the information required by Regulation 18 and Schedule 4 of the EIA Regulations. Where an applicant proposes mitigation measures to avoid, off-set and/or reduce likely significant environmental effects, these measures are required to be described in the ES;
- Consultation, publication and notification required under the EIA Regulations; and
- The steps required to be taken by the decision-maker, which are set out at paragraph 2.2.6 below.

2.2.4 The EIA Regulations prohibit the granting of planning permission for developments likely to have significant effects on the environment unless:

- information on those effects provided by the applicant in the ES and further and other information, as well as any representations made by statutory and other consultees and by members of the public (collectively "environmental information") is examined by the decision-maker;

[1] Secretary of State, 2017. Town and Country Planning (Environmental Impact Assessment) Regulations 2017, London, HMSO.

- a reasoned conclusion is reached by the decision-maker on the likely significant effects, taking into account the environmental information and, where appropriate, their own supplementary examination;
- that conclusion is integrated into the decision as to whether to grant planning permission; and,
- if planning permission is to be granted, consideration is given as to whether it is appropriate to impose monitoring measures.

2.2.5 In addition to the EIA Regulations, there is guidance available on the application of the EIA Regulations that has been considered in preparing this ES, including:

- Institute of Environmental Management Assessment (IEMA) Guidelines for Environmental Impact Assessment[2];
- IEMA Special Report into the State Environmental Impact Assessment Practice in the UK[3];
- Department for Communities and Local Government (DCLG) [now Department for Levelling Up, Housing and Communities] Amended Circular on Environmental Impact Assessment (consultation paper)[4];
- DCLG Environmental Impact Assessment: A guide to good practice and procedures (consultation paper)[5];
- National Planning Policy Framework (NPPF) 2024[6];
- Planning Practice Guidance (PPG)[7];
- Ministry of Housing, Communities and Local Government (MHCLG) Online Resource - Guidance for Environmental Impact Assessment[8];
- Department for Transport (DfT) 2008. Design Manual for Roads and Bridges Volume 11: Environmental Assessment[9];
- IEMA Guideline for Environmental Assessment of Road Traffic[10];
- IEMA Shaping Quality Development[11]; and
- Guidance of relevance to individual technical assessments have been set out in relevant technical chapters.

2.2.6 The ES has been prepared to identify and assess the likely significant effects of the Proposed Development as described in ES Chapter 4: Proposed Development Description and ES Chapter 5: Demolition and Construction Description (Volume 1).

2.3 Screening

2.3.1 Screening is the term used to describe the process by which the need for an EIA is considered. Some developments are automatically subject to EIA by virtue of their size, nature and effects. These projects, listed in Schedule 1 of the EIA Regulations and called Schedule 1 developments, include mainline railways, airports, waste facilities and large power stations. The Proposed Development is not a Schedule 1 project.

2.3.2 The need for an EIA for all other projects is determined based on the following set criteria:

- The development is within one of the classes of development listed in Schedule 2 of the EIA Regulations;

[2] Institute of Environmental Management and Assessment (IEMA), 2004. Guidelines for Environmental Impact Assessment. IEMA.
[3] Institute of Environmental Management and Assessment (IEMA), 2011. Special Report into the State Environmental Impact Assessment Practice in the UK. IEMA.
[4] Department for Communities and Local Government, 2006. Amended Circular on Environmental Impact Assessment: A consultation paper. DCLG.
[5] Department for Communities and Local Government, 2006. Environmental Impact Assessment: A guide to good practice and procedures – a consultation paper. DCLG.
[6] Department for Communities and Local Government, 2024. National Planning Policy Framework. London. HMSO.
[7] Department for Communities and Local Government (Live Document) Planning Practice Guidance [online] Available: http://planningguidance.communities.gov.uk/.
[8] Ministry of Housing, Communities and Local Government, 2014. Guidance for Environmental Impact Assessment. DCLG.
[9] Department for Transport, 2008. Design Manual for Roads and Bridges Volume 11: Environmental Assessment. Department for Transport.
[10] Institute of Environmental Assessment, 1993. Guidelines for Environmental Assessment of Road Traffic.
[11] IEMA, 2016. Environmental Impact Assessment Guide to Delivering Quality Development.

- EITHER it meets or exceeds the size threshold for that class of development in Schedule 2; OR a part of the project is in a sensitive area; and
- It is likely to have significant effects on the environment by virtue of factors such as its nature, size, or location.

2.3.3 Given the scale of the Proposed Development and the location of the Site, the Applicant considers that the Proposed Development is one that is within the description of an urban development project within Schedule 2 paragraph 10(b) *'Urban Development Projects'*. The Proposed Development exceeds the applicable size threshold for Urban Development Projects because the development includes more than 1 ha of urban development which is not residential development; and more than 150 dwellings are proposed. Given this, a request for formal screening was not necessary as the Applicant determined that an ES would be submitted with the planning application and, therefore, in accordance with regulation 5 of the EIA Regulations, the Proposed Development would be an EIA development..

2.4 Scoping and Consultation

2.4.1 Scoping is the term used in the EIA Regulations whereby an applicant can request a formal 'scoping opinion' from the relevant local planning authority on the content of an ES and the extent of the information to be considered in the assessments. The purpose of scoping is to make the ES proportional and focused on the environmental issues and potential impacts that may give rise to likely significant effects. Although it is not mandatory for a scoping opinion to be sought, where a scoping opinion has been issued, the ES must be based on the most recent scoping opinion.

2.4.2 The Applicant submitted an EIA Scoping Report to Horsham District Council (HDC) on 22nd September 2020 in support of a request for a formal EIA Scoping Opinion pursuant to Regulation 15(1) of the EIA Regulations. A Scoping Opinion was provided by HDC (the local planning authority (LPA)) in November 2020 (HDC ref: EIA/19/0004). However, that scoping opinion was based on the Applicant's then proposal to submit an outline planning application for the Site. As the iterative design of the Proposed Development progressed the Applicant determined that submission of a hybrid planning application would be more appropriate. Accordingly, the scope of the ES for the amended description of the Proposed Development was reassessed. . Subsequently, a new scoping opinion was requested in the EIA Scoping Opinion Request Report dated 17th October 2023. An updated Scoping Opinion was made by HDC in November 2023 (HDC ref: EIA/23/0007). Since November 2023, the design of the Proposed Development has altered slightly with the addition of proposed groundwater abstraction wells, and therefore it was considered necessary to reassess the scope of the ES once again for the further amended Proposed Development and request a new scoping opinion from the HDC. A revised Scoping Opinion Request Report was issued to HDC on 21st May 2024, with a scoping opinion received on 15th Jul 2024, which is presented in ES Appendix 2.2, ES Volume 2.

2.4.3 The 2024 EIA Scoping Opinion Request Report is presented in ES Appendix 2.1 of ES Volume 2 and sets out a description of the then emerging Proposed Development; the potential key environmental impacts and likely effects to be considered as part of the ES; as well as the proposed approach that would be adopted for the ES including the proposed scopes and assessment methodologies to predict the scale of effects and to assess the significance in each case.

2.4.4 A summary of the general EIA Scoping Opinion comments and requests across the scoping opinions received, as well as any relevant consultation advice or feedback, is presented in Table 2-1. The EIA Scoping Opinion comments received in respect of the individual environmental topics and technical assessments that were scoped into the EIA are considered in each of the technical assessment chapters of ES Volume 1 and 2 (Technical Appendices) and are therefore not repeated in Table 2-1.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
HDC EIA Scoping Opinion 30/11/20	HDC has concern that an outline application with all matters reserved would not include sufficient information and detail to be assessed. HDC understands that the accesses from Charlwood Road and Rusper Road will be in detail, with the remaining link road in outline. This would be the absolute minimum that HDC would support. It has further been noted that the overall scope of the application has not yet been agreed with HDC.	The Applicant is now submitting a hybrid planning application, which comprises a full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (CWMMC) and includes access from Charlwood Road and crossing points. The extent of access has been agreed with the authorities under pre-application discussions.
	HDC has requested that a clear description of the Site and its wider context is provided for the ES.	The full context of the Site and its surroundings has been set out within ES Chapter 1 (Introduction) of this volume.
	HDC has requested that a reference needs to be made to the development of 95 dwellings to the north side of Rusper Road, approved under outline permission DC/14/2132.	Since the HDC EIA Scoping Opinion in 2020, the construction of 95 dwellings on the northern side of Rusper Road (HDC ref: DC/14/2132) has been completed, and therefore, this development has been incorporated into the existing baseline of the ES.
	An EIA will need to accurately state what the proposal will comprise so that its environmental impacts can be thoroughly assessed.	The Proposed Development proposals that have been used to assess potential environmental impact(s) are set out within ES Volume 1, Chapter 4 (Proposed Development Description) and Chapter 5 (Demolition and Construction Description). As explained in the Impact Assessment section of this Chapter (See Section 2.7), where detailed information on the Proposed Development has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of similar type and scale to enable assessment of likely significant effects.
	Important to include narrative regarding wider 10,000 home scheme in cumulative effects assessment.	This planning application is for 3,000 homes in a new sustainable development supported by the much-needed infrastructure including school places and transport improvements. Any wider development would need to be promoted through a new Local Plan and would be subject to the requirements of HDC at that time. If there continues to be unmet need from neighbouring authorities, HDC would need to take this into account when allocating future development sites.
	HDC do not consider 2020 an appropriate existing baseline given the impacts of the COVID-19 pandemic.	The baseline used for the ES is dependent on each respective technical assessment and outlined in ES Volume 1, Chapters 6 to 15. The baseline has not been impacted by the lockdowns as a result of the COVID-19 pandemic.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	HDC has concern on the cumulative impact of developments in the surrounding area and the EIA should include smaller scale schemes approved nearby at HDC and Crawley Borough Council (CBC). Reference should be made to the developments at Kilnwood Vale (outline approval ref: DC/10/1612, amendments ref: DC/15/2813), Rusper Road (ref: DC/14/2132) and the Novartis site (ref: DC/18/2687). It would also be important to note the potential impact of any relevant housing allocations in the area that come forward in the Regulation 19 Horsham District Local Plan Review due to be published and consulted on in early 2021.	EIA Regulations 2017 refer to the definition of cumulative impact as cumulation with other existing development and/or approved development. It is not considered proportionate to include all sites in the area identified under Regulation 19 Horsham District Local Plan Review. Inclusion in the Plan does not guarantee delivery and to include more ambiguous cumulative schemes will distort the nature of likely significant effects and move further towards disproportionate assessment. The criteria and list of cumulative schemes have been agreed with HDC. As a result, developments at Kilnwood Vale (ref: DC/10/1612) and the Novartis site (ref: DC/18/2687) have been considered as Cumulative Schemes as presented in Table 2.6. Since the HDC EIA Scoping Opinion in 2020, the construction of 95 dwellings on the northern side of Rusper Road (HDC ref: DC/14/2132) has been completed, and therefore, this development has been incorporated into the existing baseline of the ES.
	It is incorrect to state that 'there are no mineral resources' present on this Site. HDC considers the Site is within the brick clay consultation zone under the West Sussex Mineral Local Plan. Therefore Policy 10 of the Minerals Local Plan would be applicable.	A Minerals Resource Assessment has been prepared and will be submitted alongside the ES as a part of the planning application. The Site has been categorised as lying within an area of Brick Clay Resource and as such an assessment of the minerals at the Site and the feasibility of their extraction has been undertaken. The assessment concludes that it would very likely not be feasible to extract Brick Clay on the Site.
	The HDC Environmental Officer has noted the proposal to scope out the land contamination as the Site comprises primarily previously undeveloped land. While it is accepted the majority of the Site is likely to be free from contamination, there will be isolated areas such as access tracks, hard standings and field gates where imported contaminative material may be present. This issue will need to be addressed either as part of the outline planning proposal or through a discovery strategy for each phase.	A Phase 1 Ground Conditions Assessment has been prepared and will be submitted alongside the ES as part of the planning application. This assessment reviews the potential for contamination on-Site. Embedded mitigation measures for addressing any potential contamination during demolition and construction have been provided in ES Volume 1, Chapter 5 (Demolition and Construction Description) and the Outline Construction Environmental Management Plan (OCEMP) (ES Appendix 5.1).
	The full scope of the planning application and documents to be submitted has not yet been agreed. As stated, it is important that the matters submitted with the outline are agreed and that leaving all matters reserved would not be an appropriate approach.	The Applicant is submitting a hybrid planning application, which comprises a full element covering enabling infrastructure including the CWMMC and includes access from Charlwood Road and crossing points. A proposed submission list for the hybrid planning application has been consulted on during pre-application discussions to ensure it meets validation

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
		requirements. Further details can be found in the Planning Statement.
Crawley Borough Council (CBC) EIA Scoping Opinion 27/10/20	CBC has concerns that the planning application for the Proposed Development would be outline with 'all matters reserved'. CBC has concerns that the approach set out in the EIA Scoping Opinion Request has a limited description of the Proposed Development and an all reserved matters application would not allow the HDC to realistically assess the impact of Proposed Development.	The Applicant is submitting a hybrid planning application, which comprises a full elements covering enabling infrastructure including the CWMMC and includes access from Charlwood Road and crossing points. The extent of access has been agreed with the authorities under pre-application discussions.
	The ES should include a clear and accurate description of the Site and its wider context. The ES should provide a clear explanation on the relationship and impacts on CBC.	The full context of the Site and surroundings is set out within ES Chapter 1 (Introduction) of this ES Volume.
	The description of the Proposed Development is unclear. There is no indication given on the indicative floorspace for other uses such as employment and retail. A range and upper floorspace limit should be specified.	The description of the Proposed Development for the purpose of the EIA has been set out in ES Volume 1, Chapter 4 (Proposed Development Description).
	The proposals do not take into account the CBC requirement as set out in its Regulation 19 Local Plan (Policies H3g and ST4) for the provision of a comprehensive Western Link Road (connecting from the A264 to the A23, north of County Oak) to serve any development to the western side of Crawley, or the requirement for effective linkages through Crawley's neighbourhoods to the countryside and from any new neighbourhood to existing neighbourhoods, the countryside and Crawley town centre by sustainable modes of transport.	The Crawley Town Model which forms part of the evidence base for the Crawley Local Plan concluded that a full link road running from the A264 to the west to A23 London Road to access junctions for the Proposed Development was not necessary to address traffic impacts in Crawley / Horsham or support the Crawley Local Plan (and the Proposed Development), The CWMMC is a strategic piece of infrastructure that relates to development beyond the potential of West of Ifield alone as outlined in the West Sussex County Council (WSCC) Local Transport Plan. However, as stated in the Design and Access Statement (WOI-HPA-DOC-DAS-01) the various iterations of the masterplans do not prejudice the potential future connection for the CWMMC to the A264. The details of linkages to Crawley neighbourhoods, the countryside and town centre are provided in the Transport Assessment which are submitted alongside the ES as part of the planning application.
	There is no clear description of the project works on how the Proposed Development would be phased or delivered.	As presented in ES Volume 1, Chapters 6 to 15, the assessment boundaries have been determined by a topic-by-topic basis and proportionate to the assessment of likely significant effects for each thematic assessment

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	It is considered that the development area of the ES should be drawn much wider to cover off all impacts including the alignment of a potential Western Link Road. Furthermore, the description of works gives no indication of any other infrastructure connections or improvements back into Crawley itself, the impact on road infrastructure is likely to be significant. It is considered that the proposed ES boundary is too tightly defined as new infrastructure may be needed well beyond this defined development boundary. CBC does not support the suggested approach that more land could be included within the ES as a minor amendment. An Indicative Search Corridor for a Western Link Road is included on the Regulation 19 Crawley Borough Local Plan Proposals Map	As stated above, CBC's own transport evidence determines that the Proposed Development would not require the full extent of the CWMMC to be delivered, but would make provision for the safeguarding for potential future phases of the link road to be made.
	CBC understand that Homes England may potentially develop a wider 10,000 homes on land West of Ifield. Proposed phases should be identified and/ or recognised within the ES.	The planning application is for 3,000 homes in a new sustainable development supported by the much-needed infrastructure including school places and transport improvements. Any wider development would need to be promoted through a new Local Plan and would be subject to the requirements of HDC at that time. If there continues to be unmet need from neighbouring authorities, HDC would need to take this into account when allocating future development sites.
	The method of public engagement to ensure meaningful feedback should be considered given the restrictions in place due to the COVID-19 pandemic. Consideration should be given to: Those who may feel more isolated or excluded from engagement at this time; and Active travel matters including Active Travel England, Horsham District Cycling Forum, Crawley Walking and Cycling Forum and Local Environmental groups.	Three rounds of in-person consultation with the local community were held between 20th October 2022 and 11th November 2022 with two events held on weekdays (which included evenings) and one at the weekend during the half term. Each event was also at a different venue that was carefully selected to maximise attendance. In addition, two online webinars were held on 1st November 2022 and 8th November 2022, as well as a community update exhibition in April 2025. A summary the consultation has been provided in ES Volume 1, Chapter 3 (Alternatives and Design Evolution) and accompanying Statement of Community Involvement (WOI-HPA-DOC-SCI-01). These events have been considered an appropriate time to undertake consultation to have not been impacted by the COVID-19 pandemic.
	CBC has concerns in using 2020 as the existing baseline given the impacts of the COVID-19 pandemic. Baselines	The baseline used for the ES is dependent on each respective technical assessment and outlined in ES Volume 1, Chapters 6 to 15. Baselines have been

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements

Consultee	Scoping Opinion	How we have addressed
	should be agreed with CBC and HDC for each of the technical topics.	based on 2023 data or more recent. Professional judgement deems any residual pandemic impacts insignificant due to the normalisation of activities and reduced influence of restrictions by 2023. There is an exception in ES Volume 1 Chapter 13: Socio-Economics and Health where Census Data from 2021 has been used to inform the baseline. The 2021 Office for National Statistics (ONS) Census was impacted by the COVID-19 pandemic, primarily in terms of operational logistics and potentially some respondent behaviours, however, the ONS took comprehensive steps to ensure data quality and reliability, and the census is still considered a credible and valuable data source, with caveats about the unique context in which it was conducted. The baselines used are therefore considered representative and suitable for establishing a reliable baseline.
	CBC considers the thresholds for the cumulative scheme is too high. CBC has requested that the thresholds are lowered to include residential developments within Crawley (i.e. residential lower than 200 units). Furthermore, the assessment should include developments in next Local Plan period.	EIA Regulations 2017 refer to the definition of cumulative impact as cumulation with other existing development and/or approved development. The criteria and list of cumulative schemes have been agreed with HDC CDC and the Applicant[12]. The schemes proposed to be included as part of the inter cumulative assessment ('committed' or 'consented' schemes') for each topic has been based on screening against a 'longlist' of schemes assessed applying the following criteria: • minerals and waste developments; or • significant highways, infrastructure and public transport schemes; or • development comprising more than 10,000 sq m of gross development floor area; or • development comprising 50 or more residential units; and • within 5km of the Site. It is not considered proportionate to include all sites in the area identified Local Plan Review. In addition, inclusion in a draft plan is not committed or consented and so is outside the definition, and therefore will distort the nature of likely significant effects and move further towards disproportionate assessment.
	Overheating should be addressed under the adverse weather category.	It has been agreed with CBC (as per a meeting on 24th February 2021) that an overheating assessment of the Proposed Development would be covered during the reserved matters application stage as this assessment isn't possible at this stage.

[12] The Applicant discussed a list of cumulative schemes with both HDC and CDC in 2024. CBC provided an updated list to be updated in the EIA on 10 April 2024. HDC had no further sites to add as confirmed via email correspondence to the Applicant dated 15 April 2024.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	Contrary to HDC, CBC don't agree to waste being scoped out of the assessment (although a SWMP and OWMP are proposed). CBC note that resource management should be considered with respect to climate change.	Chapter 4 (Proposed Development Description) of this ES volume sets out the anticipated waste arisings and material use associated with the Proposed Development. A separate impact assessment chapter on waste is not considered necessary. A site waste management plan (SWMP) and operational waste management strategy (OWMS) are considered the best places to set out how waste will be managed sustainably. As agreed with CBC via email on 18th March 2021, the climate change ES chapter will consider waste and resource management as follows: The greenhouse gas assessment will consider the potential carbon emissions associated with the disposal of the waste. The Applicant will not be considering waste and resource management in terms of climate resilience or in-combination climate change impacts (ICCI) as this is considered to not be possible. The Applicant will further consider waste and resource management e.g. waste minimisation, use of modular construction methods where feasible etc. Recommendations will be incorporated into the climate change ES chapter.
	CBC has serious concerns about the proposed scope of the planning application (set out in paragraph 4.14) which proposes to reserve 'all matters'. The timing of this EIASR is challenging as this proposal is running parallel with both authorities Local Plan reviews. The ES must therefore take full account of the emerging policy requirements from both the HDC Regulation 18 and CBC Regulation 19 Local Plans (and any subsequent revisions that may follow). The ES needs to ensure that it remains flexible to assess any emerging parameters that may arise as the Local Plan processes continue. It is noted that there is no reference in Section 16 'References' to either of Crawley Borough Council's emerging Local Plan Review documents (Regulation 18 or Regulation 19). These plans give clear guidance on the policy direction for the Borough, the aspirations of the Council in respect to matters of design, ecology, sustainable construction, infrastructure etc. and the requirements which must be addressed within the ES.	The Applicant is seeking hybrid planning permission with necessary infrastructure, including the CWMMC, for the delivery of the secondary school, applied for in detail, and the remainder of the development as outline. The Site does not include any land within Crawley Borough and therefore the Crawley Borough Local Plan (2024) is not relevant to this application. Further comment has also been provided in the Planning Statement which accompanies the planning application. The hybrid planning application is submitted under the following development plan: • Horsham District Planning Framework (2015) • Rusper Neighbourhood Plan (made 2021) • Joint Minerals Local Plan and Waste Local Plan • Further details on planning policy are set out in the Planning Statement.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	CBC has concerns about proceeding with the application ahead of the Crawley Borough Local Plan.	Further details on planning policy are set out in the Planning Statement. The Site does not include any land within Crawley Borough and therefore the Crawley Borough Local Plan (2024) is not relevant to this application. Further comment has also been provided in the Planning Statement which accompanies the planning application.
West Sussex County Council Highways 12/10/2020	West Sussex County Council Highways have noted that Kilnwood Vale (outline approval ref: DC/10/1612, amendments ref: DC/15/2813) and the redevelopment of the former Novartis site (DC/18/2687) are missing from the cumulative list provided in the ES Scoping Opinion Request.	As stated previously, in consultation and agreement with HDC the criteria has been set out and included in the Cumulative Assessment section (Section 2.10) of this ES Chapter. The full list of schemes to be assessed can be found in Table 2.6 in this ES Chapter.
Gatwick Airport Limited 28/10/2020	Gatwick Airport Limited notes the four developments at Gatwick Airport are listed (reference numbers 12, 13, 14 and 48). Gatwick Airport Limited agrees that these developments are relevant to the cumulative assessment, in particular no. 48 - the Gatwick Northern Runway development, being brought forward as a Nationally Significant Infrastructure Project. In addition, Gatwick Airport Limited would advise that the Gatwick Airport Rail Station Project, granted permission to Network Rail by CBC in 2019, and now under construction should be added to the long list. The allocation of land for the Horley Strategic Business Park to the south of Horley, in the adopted Reigate and Banstead Development Management Plan 2019, should also be considered, due to its location on the strategic road network. Gatwick Airport Limited notes that the development of a wide spaced runway to the south of Gatwick, which is subject to long term safeguarding in national and local policy, is not identified in the 'long list'	The cumulative effects assessment has included the proposed alterations of Gatwick Airport to support dual runway operations through the routine use of the existing northern runway and to accommodate up to 80.2 million passengers per annum. The Planning Inspectorate on behalf of the Secretary of State accepted the application for Development Consent Order on 3rd August 2023, and issued a Minded to Approve letter in February 2025. The Office of Rail and Road (ORR) authorised into service the newly upgraded Gatwick Airport station in November 2023[13]. Given that this scheme is now complete and operational, this has not formed part of the cumulative assessment, but has been assessed in the baseline assessment, where appropriate. The ES assessment (specifically ES Volume 1, Chapter 12: Noise) has used Gatwick provided noise contours within its assessment, where appropriate. The noise contours have taken into account the potential southern runway.
Horsham District Council Landscape 05/11/2020	The parameter plan 'Public Realm, Open and Play Space' needs to reflect the landscape and ecology strategy for the Site. The parameter plans should clearly identify the existing landscape fabric, buffer zones, tree lined routes,	The Description of Development and the proposed land uses are set out within the Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01) and the Design and Access Statement (WOI-HPA-DOC-DAS-01). Further details

[13] Office of Rail and Road, November 2023. Press Release. Available online at: https://www.orr.gov.uk/search-news/orr-gives-go-ahead-upgraded-gatwick-airport-railway-station-open#:~:text=The%20Office%20of%20Rail%20and%20Road%20%28ORR%29%2C%20has,the%20station%20meets%20the%20expected%20standards%20for%20passengers.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	key panoramic views or view cones to be protected, the distinction between public green spaces and inaccessible areas such as ancient woodland or other ecological sensitive enhancement areas, existing water courses and attenuation areas. this is also expected to be coordinated with the walking and cycling strategy presented under Vehicular Access, Pedestrian Access and Servicing parameter plan.	are presented in ES Volume 1, ES Chapter 4 (Proposed Development Description). For the Proposed Development, the Development Specification and Parameter Plan Framework presents proposed open land, formal and informal recreation, landscaping, surface water drainage features, sustainable drainage systems, nature conservation areas, and pedestrian and cycle routes.
Horsham District Council EIA Scoping Opinion 27/11/2023	The report states that the application will now be in the form of a hybrid application. This is supported.	No response needed; the Applicant is submitting a hybrid planning application.
	Reference should be made here [Para 2.1.1] to the flood risk areas (fluvial and surface water) within the Site.	Fluvial and surface water flood risk has been assessed in ES Volume 1 Chapter 14 (Water Environment and Flood Risk), and the Flood Risk Assessment (standalone document that has been submitted with the planning application).
	Reference should be made to the Ancient Woodland within Ifield Brook to the southeast corner of the Site. Reference should also be made to flood risk areas within Ifield Brook.	Ancient woodlands and other ecological sensitivities have been assessed in ES Volume 1 Chapter 8 (Biodiversity), and the Arboricultural Report (standalone document that has been submitted with the planning application).
	It is unclear as to how Phases 1A and 1B are to be divided up and what they cover. This needs to be clear in any planning application.	When referring to phasing, the assessment refers to the full (Phase 1) element only; this replaces any prior reference to Phase 1a and 1b. The Planning Application Boundary Plan (drawing ref. WOI-HPA-PLAN-PAB-01) illustrates the extent of the area that forms the full (Phase 1) element.
	The third part of the description of the proposal states 'This Hybrid application is for a phased development intended to be capable of coming forward in distinct and separate phases and / or plots in a severable way.' This phrase does not need to be in the description of development. In addition, how the scheme will come forward and its phasing is a matter to be agreed under a planning application.	Given that the proposals are for a large-scale development, it is anticipated that the Proposed Development will be delivered over a number of years and as such, requires flexibility and allowance for future-proofing for appropriate subsequent applications to come forward in alternative formats which are similarly acceptable in planning terms. The Proposed Development is designed to come forward in distinct and separate phases and / or plots in a severable way, and the Applicant considers that this fact should form part of the description. The ES presents information on the likely significant effects arising from the Proposed Development as described in Chapter 4 Proposed Development Description.
	The HDC Arboricultural Officer has commented that, given the limited amount of tree-related information within the EIA Scoping Opinion Request Report, it is not possible to fully ascertain what the full Arboricultural	An Arboricultural Report has been submitted as part of the planning application, and includes recommended planning and mitigation measures for the Proposed Development.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	impact of this proposal would be, and this needs to be appropriately assessed should a complete application be forthcoming.	
Crawley Borough Council EIA Scoping Opinion 27/11/2023	The Scoping report does not explain accurately or address the context of the development in the wider area. The removal of the applicants' land (effectively moving the red edge away from the borough boundary) does not negate the need to acknowledge and thoroughly understand the context of the development site and its relationship to the borough boundary and, in particular, in relation to Ifield neighbourhood and Ifield West. The new development would either abut and /or need to connect into these areas of Crawley at the southern and eastern edge of the site. The previous comments made in Part 2 of the previous CBC Scoping Response remain relevant. Further information on the importance of the understanding of site context is also set out in policies CL2, CL3, CL4 and CL5 in the emerging Local Plan (pages 44- 55).	The context of the Proposed Development within the context of the wider area is described in ES Volume 1 Chapter 4 (proposed Development Description) and considered and/or assessment within the technical chapters of the ES (refer Chapter 6-15). The Site context in relation to local and regional policies (including the emerging Local Plan) has been discussed in the Planning Statement which accompanies the planning application.
	CBC welcome the applicant's revised approach to submitting a hybrid application which will detail the principal elements in 'outline' and seek full planning permission for the enabling infrastructure works. Delivery of the infrastructure to support any development of this scale and magnitude is key, given the existing pressures on Crawley's highway infrastructure and the obvious environmental constraints of the site, such as the River Mole and its floodplain. It is still not clear whether the entire route of the proposed Crawley western corridor would be included as part of the full application or whether it would just be the key junctions at the north (Charlwood Road) and south (Rusper Road).	No response needed; the Applicant is submitting a hybrid planning application which seeks full planning permission for the enabling infrastructure works (including the CWMMC).
	The proposed wording of the hybrid application (para 3.1.4) is ambiguous and the extent of phases 1a and 1b are not clear from the report or	When referring to phasing, the assessment refers to the full (Phase 1) element only; this replaces any prior reference to Phase 1a and 1b.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	accompanying plan. CBC wish to reiterate that it is vital that there is certainty that all key elements of the road and transport infrastructure are capable of being comprehensively delivered at the earliest stages of any development, to avoid traffic and congestion within neighbourhoods such as Ifield and to ensure active travel options and bus routes to serve the site are established at the earliest opportunity.	The Planning Application Boundary Plan (drawing ref. WOI-HPA-PLAN-PAB-01) illustrates the extent of the area that forms the full (Phase 1) element. The Applicant can only make an application for the development of the CWMMC that falls within the boundary of the Site. The CWMMC is a strategic piece of infrastructure that relates to development beyond the potential of West of Ifield (SA291) alone. However, the Applicant is committed to ensuring a potential future wider link road is safeguarded within the land included in the planning application.
	The Gatwick Northern Runway DCO is for up to 80.2 million passengers per annum, not 74 million as quoted. The list of cumulative impacts provided is quite out of date with some developments now constructed and newer proposals omitted. This list should be reviewed separately by the applicant.	The revised number of 80.2 million has been noted. The list of cumulative schemes has been reviewed and updated so that built out developments are now considered in the baseline and the Gatwick Northern Runway DCO reflects 80.2 million passengers per annum.
	Reference should be made to the policies of the Draft Crawley Borough Local Plan 2024-2040, which has been submitted for examination and for which the hearings commence on 21 November. These policies are considered to have increasing weight, have not been referenced in many chapters of the Scoping Report and must be considered.	National, regional and local planning policies have been used in the assessment of the ES, including within the technical chapters of the ES (refer Chapter 6-15). The Site does not include any land within Crawley Borough Council and therefore the Crawley Borough Local Plan (2024) is not part of the Development Plan for determining this planning application. Further comment has also been provided in the Planning Statement which accompanies the planning application.
	CBC note reference in paragraph 1.5.4 to an HDC document 'Facilitating Appropriate Development.' It is unclear whether the applicants intend to rely upon this to progress an application prior to the Regulation 19 consultation and outcome of the Horsham Local Plan review.	The ES has been informed by legislation, policies and published guidance. Specific guidance used for each technical ES assessment within the ES (Chapters 6-15) can be found within the specific chapter.
	While the timing of the planning application is not explicitly stated, CBC has serious concerns about the progression of any planning application ahead of the adoption of the new Horsham District Local Plan. If allocated, a development of such as scale must take into account the detailed policy requirements (if allocated by HDC) and the consultation responses received as part of the Local Plan process, along with any	Further details on planning policy are set out in the Planning Statement.

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	modifications made during Examination. Until the outcome of the HDC Local Plan process is known, any application would be premature as it could not be certain that it would comply in detail the policies relevant for any future allocation.	
Horsham District Council EIA Scoping Opinion 15/07/2024	It is unclear as to how Phases 1A and 1B are to be divided up and what they cover. This needs to be clear in any planning application.	When referring to phasing, the assessment refers to the full (Phase 1) element only; this replaces any prior reference to Phase 1a and 1b. The Planning Application Boundary Plan (drawing ref. WOI-HPA-PLAN-PAB-01) illustrates the extent of the area that forms the full (Phase 1) element.
	The third part of the description of the proposal states 'This Hybrid application is for a phased development intended to be capable of coming forward in distinct and separate phases and / or plots in a severable way.' This phrase does not need to be in the description of development. In addition, how the scheme will come forward and its phasing is a matter to be agreed under a planning application.	Further details on planning policy are set out in the Planning Statement.
	Table 3.3 states that for local community (Class F2) uses the minimum floorspace under a S106 would be 600sqm. This is a reduction from the scoping report under EIA/23/007 which refers to a minimum of 1,000sqm. What is the reasoning for this reduction? There are concerns that 600sqm may not be sufficient for this use.	There has been an increase in the size of the local leisure facility (under Class E) (minimum of 3,4000 sqm) where elements of sport that previously fell in a mixed-use community hub in the Neighbourhood Centre now fall within the local leisure centre. The Class F2 allowance has therefore been reduced accordingly; and this is still considered to be a substantial facility for the Site.
	Para 4.6.6 refers to CBC comments on the cumulative effects. The applicant is referred to CBC to agree their approach to the methodology.	The approach for cumulative effects has been agreed with the Applicant and HDC.
	Please note that the Horsham Golf & Fitness application (DC/23/1178) was refused on the 14th May 2024.	This scheme has not been included within the cumulative scheme assessment.
	Active Travel England (ATE) have commented that they do not currently provide detailed advice at pre-application stage. However, they have produced a standing advice note that summaries some of the key active travel criteria that ATE will assess when consulted on a formal application.	Noted. The ES has been informed by legislation, policies and published guidance. Specific guidance used for each technical ES assessment within the ES (Chapters 6-15) can be found within the specific chapter.
	The HDC Environmental Health Team have commented it is noted that the	An Outline Construction Environmental Management Plan (OCEMP) has been prepared for

Table 2-1 : General EIA Scoping Opinion Comments, Responses and Agreements		
Consultee	**Scoping Opinion**	**How we have addressed**
	Outline Construction Environmental Management Plan is to include mitigation for ground conditions during the construction phase. This should be a requirement if the application proceeds.	the Proposed Development (ES Volume 2 Technical Appendix 5.1), and has been submitted with the planning application. The OCEMP includes measures for ground conditions during the construction stage.

2.4.5 In accordance with Regulation 18(4)(a), the ES has been prepared based on the most recent Scoping Opinion received for the Proposed Development. Where the approach differs, full justification is provided within the technical assessment, as appropriate.

Non-Significant Issues

2.4.6 The ES Scoping Process has identified which environmental topics might give rise to likely significant environmental effects, as a result of the Proposed Development. Those topics not predicted to give rise to likely significant effects have been scoped out and are not considered further in the ES. However, topics which are scoped out of the ES may be covered in separate documentation submitted with the hybrid planning application. Those with likely significant effects are considered within the technical chapters of the ES (refer Chapter 6-15). Full justification for scoping these topics areas out of the ES is provided in ES Appendices 2.1-2.2 and is therefore not repeated here.

Table 2-2: Scoping Summary			
Topic	**Scoped In (Y/N)**	**Comments**	**ES Chapter No.**
Soil and Agriculture	Construction Y	The Proposed Development has the potential to affect associated farm infrastructure, reducing the total land available to that enterprise through direct loss of farmland and holdings, including land drainage. Land adjacent within agricultural production could be affected by dust and noise disturbance, particularly on land with livestock.	6
	Operation N	Development, operational impacts would not be expected to affect agricultural receptors.	
Air Quality	Construction Y	The Proposed Development has the potential to affect air quality through emissions to air and dust during construction from earthworks and transport related impacts. Receptors located along Charlwood Road, Ifield Avenue and Rupser Road may be affected by changes in traffic.	7
	Operation Y	Operational impacts would consider quantitatively the shift in vehicle emissions as a result of the new occupants and visitors. Ecological sites with national designations (specifically meaning SSSIs and European designated ecology sites) are sensitive to nitrogen deposition.	
Biodiversity	Construction Y	Potential to result in severance and disturbance of existing green infrastructure including a range of habitats, mammals, amphibians, reptiles, birds, terrestrial invertebrates and invasive plant species in the absence of mitigation through the design which are important ecological features.	8
	Operation Y	Operational effects may include disturbance from activities associated with the Proposed Development, and pollution.	

Table 2-2: Scoping Summary

Topic	Scoped In (Y/N)	Comments	ES Chapter No.
Climate	Construction Y	Potential for the Proposed Development to be affected by climate change over its lifetime and calculation of greenhouse gas (GHG) emissions from the demolition and construction processes.	9
	Operation Y	Operational effects would produce GHG emissions.	
Cultural Heritage	Construction Y	Potential to impact a scheduled monument, conservation areas and several non-designated assets within and in close proximity of the Site during construction. The non-designated assets mainly relate to previous land use. However, mitigation measures would be implemented. The northern area of the Site is abutted by the scheduled monument (Medieval moated site at Ifield Court). This asset's setting could be impacted by the Proposed Development and the southern part of the Site would have potential to impact historic farms which would be demolished during construction and therefore would be scoped in the ES. Visual setting of Ifield village conservation area and the scheduled monument could be impacted by construction of the proposed CWMMC.	10
	Operation Y	Following the implementation of mitigation measures, effects on archaeological resources in operation would not be significant and have been scoped out. The Proposed Development would have permanent effects on the visual setting of heritage assets and are scoped in.	
Ground Conditions	Construction N	The Proposed Development does not lie in an area of significant current and historic industrial uses and construction of the Proposed Development will not introduce significant contaminant pathways to human health, watercourses or damage to buildings or infrastructure. There are no sites of geological importance present on or adjacent to the Site that have the potential to be affected by construction and therefore construction effects, including potential effects on groundwater quality, have been scoped out of the ES. A separate Ground Conditions desk study report has been prepared and included within the hybrid planning application documents (however, not part of the ES). In addition, an OCEMP (ES Volume 2 Technical Appendix 5.1) which includes mitigation for ground conditions during the construction phase, has been included within the hybrid planning application documents. The Site is located within a mineral safeguarding area. A separate mineral resource assessment has been prepared and included within the hybrid planning application documents (however, not part of the ES). HDC indicated that it is acceptable to 'scope out' ground conditions from the EIA provided that a ground conditions assessment is included as part of the relevant application documents (but not part of the ES) and that ground conditions are considered at each phase of the Proposed Development (as part of Reserved Matters Applications).	N/A
	Operation N	Operational effects of the Proposed Development will overall generate little in the way of potentially significant contaminative materials given it is a mixed use urban development. The potential	

Table 2-2: Scoping Summary

Topic	Scoped In (Y/N)	Comments	ES Chapter No.
		effect of the Proposed Development during operation on groundwater quality, minerals or sites of geological importance is considered limited and therefore are scoped out of the ES.	
Landscape and Visual Impact	Construction Y	The Proposed Development could have potential significant effects on the visual receptors such as residents along the Rusper Road and settlements within, open access land immediately north of the Site and character areas and views for the users of recreational facilities such as Ifield Brook Wood and Meadows during construction. The Proposed Development has the potential to result in lighting effects to visual receptors during the construction phase, and at full completion. A separate, stand-alone assessment of lighting glow from the Proposed Development experienced by potential visual receptors has been undertaken and will be submitted with the hybrid planning application. A discrete ES Lighting Chapter has been scoped out.	11
	Operation Y	The operational phase has the potential for significant effects upon the landscape character and visual amenity of receptors such as High Weald area of outstanding natural beauty (AONB), Sussex Border Path (footpath) and would consider the context of the Proposed Development and other consented schemes nearby.	
Noise and Vibration	Construction Y	The Proposed Development has the potential to result in noise and vibration impacts during construction on the surrounding receptors which include residential properties.	12
	Operation Y/N	Operational highways have the potential to result in noise impacts on surrounding receptors due to the introduction of the Proposed Development. Operational phase ground borne vibration has been scoped out as no aspect of the Proposed Development is likely to generate any discernible levels of ground borne vibration.	
Socio Economics and Health	Construction Y	The Proposed Development has the potential to impact local business and the community and create jobs during construction.	13
	Operation Y	The Proposed Development may have some effects on local health and education facilities albeit that the Proposed Development itself will provide appropriate levels of such facilities within the scheme. The provision of the Proposed Development would also have beneficial effects during operation, as it may complement other nearby future developments.	
Water Environment and Flood Risk	Construction Y	The Proposed Development lies mainly within Flood Zone 1, Zones 2 and 3 and the works proposed have the potential to introduce significant environmental effects of flood risk to the River Mole, Ifield Brook and other watercourses.	14
	Operation Y		
	Construction N	The hydrogeological risk assessment (HyRA), included as Appendix B of the EIA Scoping Opinion Request Report issued to HDC on 21st May 2024 has not identified any significant residual risks to surface water and groundwater resources or quality that may result from the proposed construction of installation abstraction borehole/s at the Proposed Development site. Any construction	N/A

Table 2-2: Scoping Summary

Topic	Scoped In (Y/N)	Comments	ES Chapter No.
		activities will be limited in duration and to a few locations. Drilling and testing of the borehole/s will be undertaken according to best practice, under an Environmental Management Plan and subject to conditions as agreed with the Environment Agency (EA), with appropriate permits and licences in place. The potential effect of the proposed construction of installed abstraction borehole/s at the Proposed Development on groundwater surface water and groundwater resources or quality is considered limited and therefore have been scoped out of the ES.	
	Operation N	Operational effects of the installed abstraction borehole/s on groundwater resources are reduced due to the confined nature of the target aquifer, distance of any potential aquifer recharge areas, and the lack of potential receptors on the aquifer's outcrop area. Availability within the aquifer for water resource usage with minimal impacts is indicated by the EA's abstraction management strategy. Any wider long-term influence on groundwater levels away from the abstraction borehole will be reduced across a large and distant recharge area. Operational effects from the abstraction borehole/s at the Proposed Development site are therefore considered limited and have been scoped out of the ES.	
Traffic and Transport	Construction Y	The Proposed Development would likely create traffic and transport effects to the existing road network as a result of constructing the Proposed Development.	15
	Operation Y	During operation, the Proposed Development could have potentially significant effects on traffic flows on the local highways due to its connections with the wider transport network, change in journey times and other committed developments likely to come forward in the future.	
Waste Resource and Management	Construction N	Waste and materials associated with the Proposed Development during the construction and operational phases would be considered within 'standalone' documents separate to the ES, including a Site Waste Management Plan (SWMP), Operational Waste Management Strategy (OWMS) and a Sustainability Strategy. Further details behind the reasoning of 'scoping out' Waste and Resource Management from the EIA as included in Chapter 15 of the EIA Scoping Opinion Request Report, issued to HDC on 21st May 2024. A copy of the 2024 Report can be found in ES Volume 2 Technical Appendix 2.1 in this ES.	N/A
	Operation N		
Wind Microclimate, Daylight, Sunlight and Overshadowing	Construction N	No potential significant effects and have been scoped out of the ES.	N/A
	Operation N		

Table 2-2: Scoping Summary			
Topic	**Scoped In (Y/N)**	**Comments**	**ES Chapter No.**
Major Accidents and Disaster	Construction N	Flood risk, adverse weather, and transport issues associated with major events affecting the operation of Gatwick Airport north of the Site are addressed in the respective sections of the ES. Further details behind the reasoning of 'scoping out' Major Accidents and Disaster from the EIA as included in Chapter 16 of the Scoping Opinion Request Report which was issued to HDC on 21st May 2024. A copy of the 2024 Report can be found in Appendix 2.1 in this ES	N/A
	Operation N		

2.5 EIA Approach

Consideration of Alternatives

2.5.1 There is no requirement in the EIA Regulations for an applicant to consider alternatives. However, where alternatives have been considered the ES must include a description of the reasonable alternatives studied by the applicant that are relevant to the proposed project and its specific characteristics, as well as an indication of the main reasons for selecting the preferred option, including a comparison of the environmental effects. The EIA Regulations at Schedule 4 para 2 state that *"a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects*". This is further referred to in the PPG on EIA.

2.5.2 ES Chapter 3: Design Evolution and Alternatives explores the objectives of the Proposed Development and describes how the development proposals have evolved in response to environmental and planning opportunities and constraints.

Baseline

2.5.3 The purpose of the ES is to present information on the identification and assessment of likely significant environmental effects. As part of this an ES needs to provide information on how environmental conditions may change as a result of a proposed development and to specify any investigative measures to be taken and/or required. Schedule 4 paragraph 3 of the EIA Regulations states that the ES must include "*a description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge*".

2.5.4 Within this ES the baseline has been established through a combination of desk-based research, site survey and empirical studies and projections. Together, these describe the existing and future character of the Site and the value and vulnerability of key environmental resources and receptors, against which any changes or effects resulting from a proposed development can be identified, understood and assessed.

2.5.5 Within the ES , the existing baseline represents the existing environmental conditions of the Site and the surrounding study areas at the time of the assessments as described in ES Chapter 1: Introduction. The technical assessments in ES Volume 1 (6 - 15) provide a description of topic specific existing baseline conditions against which the Proposed Development has been assessed, and a consideration as appropriate of a future baseline without the Proposed Development.

Receptors

2.5.6 The potential receptors that may be sensitive to potential environmental impacts as a result of the Proposed Development, are provided in Table 2-3.

Table 2-3 : Summary Receptors

Category	Sensitive Receptor
Agriculture and Soils	• Soil resources • Subgrade 3b agricultural land • Non-agricultural land, e.g. golf course, buildings, roads, waterbodies/ courses • Farm holding (farm tenancy involving production of mainly combinable crops)
Air Quality	• Existing off-Site human health and amenity • Existing off-Site designated nature conservation sites
Biodiversity	• Designated sites including Special Area of Conservation (SAC), Special Protected Area (SPA), (National Nature Reserves (NNR), Site of Special Scientific Interest (SSSI), and Local Nature Reserves (LNR) • Habitats • Protected species including Invertebrates, Amphibians, Reptiles, Birds Bats, Badgers, Hazel Dormouse, Otters, Hedgehog, Harvest Mouse
Climate	• Buildings and infrastructure receptors (including equipment, materials and building operations • Human health receptors (e.g. construction workers, occupants, Site users) • Environmental receptors (e.g. integrity of landscape features, habitats and species)
Cultural Heritage	• Scheduled monuments • Listed buildings • Conservation areas • Locally listed buildings • Non-designated heritage assets • Archaeological potential
Landscape and Visual	• Local landscape character areas • Views from Ifield Conservation Area and its setting • Nighttime visual receptors including occupiers of residential properties, people travelling along rural roads and residents staying in hotels • Surrounding residential dwellings • Views to and from Public Rights of way (PRoW) and at public open spaces for recreational users • Residents and the wider community on the nearby road network
Noise	• Existing off-Site receptors (including residential dwellings and Gatwick Hotel) • Future on-Site receptors (including future schools and dwellings)
Socio Economics	• Labour market • Accommodation stock • Educational facilities • Primary healthcare facilities • Users or recreational areas/open space/PRoWs • Sport facilities • Local communities • Local services and infrastructure • Local businesses
Water Environment and Flood Risk	• On-Site surface water quality (tributaries, rivers and catchment) • On-Site flood risk • Flood risk of land upstream or downstream
Transport	• Highway links • Pedestrian facilities • Cycle facilities

2.6 Impact Assessment

Assessment Methodology

General

2.6.1 The aim of the ES is not to assess the Proposed Development's compliance/performance against planning policy as this is considered within the Planning Statement that accompanies the application. Instead, reference has been made to national, regional and local policy to inform the scope of technical assessments, the assessment methodologies applied and the existence of any sensitive receptors to be considered. Detailed methodologies for the assessment of each of the environmental topic areas scoped into the ES are provided within each technical chapter of this ES Volume and ES Volume 2 (Technical Appendices); however, in general terms, the assessments have been based upon the approach outlined below.

2.6.2 Review of the existing conditions at and surrounding the Site for the environmental topic area under consideration via various sources of existing information, data and reports including but not limited to:

- Desk-top studies;
- Site surveys;
- Consideration of relevant legislation;
- Consideration of relevant planning policies (national, regional and local), guidance and standards;
- Consultations with stakeholders and consultees as appropriate;
- Consideration of potentially sensitive receptors that could be affected by the Proposed Development;
- Use of published technical guidance and best practice;
- Use of quantitative and qualitative assessment methods, professional judgement and expert opinion;
- Identification of potential environmental impacts and likely effects, with an evaluation of their likely duration, magnitude and scale, taking into consideration embedded mitigation (where relevant); and
- Where applicable recommendation for additional mitigation and/or enhancement measures, followed by an assessment of the significance of the residual effects.

2.6.3 How the Proposed Development might affect the environment relies on predictions about what impact a certain action would have. Some predictions can be made using mathematical or simulation models, particularly where there are well known relationships between cause and effect. For example, the degree to which noise levels may increase as a result of additional traffic flows can be predicted using a mathematical equation. The level of air pollution from a known traffic flow can also be predicted from a computer-based simulation model. Other impacts are less easy to predict in quantitative terms; for example, whilst the extent of a loss of a habitat can be measured, the effect on the abundance of individual species is more difficult to predict. In such cases, the ES attempts to quantify the anticipated scale of impact using empirical experience, literature and professional judgement.

2.6.4 In all cases, the overall approach and specific methods of predicting the likely nature and magnitude of impact, as well as the scale of effect is set out in each of the technical assessments. Where used, recognised specific predictive methods are referenced. Any assumptions or limitations to knowledge are stated. In either case the thought process leading to the conclusions is based on reasonably reliable data and so is considered to be prudent and robust.

2.6.5 Where detailed information on the Proposed Development has not been available, reasonable assumptions have been made, and have been clearly set out, based on experience of developments of similar type and scale to enable assessment of likely significant effects.

2.6.6 The Proposed Development has not yet been approved so the conditional tense ('would') has been used to describe the development proposals, situations, potential impacts and likely effects that could/would arise from the introduction of the Proposed Development, as well as the mitigation measures that would be delivered or would be required upon approval of the Proposed Development. This approach does not lessen the Applicant's commitment to deliver the Proposed Development as presented within this ES. Furthermore, each technical assessment (and summary tables at the conclusion of each technical chapter) clearly sets out the means by which any required mitigation measures relied upon, would be secured.

Proposed Development Stages

2.6.7 The ES considers the following stages of the Proposed Development:

- Demolition and Construction Stage;
- Completed Development Stage (operational); and
- Cumulative Stage.

2.6.8 The Proposed Development is designed to come forward in distinct and separate phases and / or plots in a severable way, and the Applicant considers that this fact should form part of the description within the ES.

2.6.9 Although the demolition and construction programme of the Proposed Development would be sequenced over a 15 year period, in addition to assessing a phased delivery, some ES Chapters have also assessed and reported on the environmental effects of the completed development as a whole, as this represents worst case for certain identified receptors and likely significant effects. The worst case scenario is clearly stated and justified in each ES Chapter, where applicable.

2.6.10 The assessment of the phased delivery of the Proposed Development has been undertaken in the demolition and construction stage assessment based on the information provided in ES Chapter 5: Demolition and Construction Description. The development programme and demolition/construction methods presented in this chapter have informed the identification of on- and off-Site receptors for assessment, as well as potential 'worst-case' scenarios.

Assessment Scenarios

2.6.11 The assessment of the Proposed Development has been carried out against the existing baseline conditions as described in the technical assessment chapters and supplemented by relevant existing and updated surveys, as listed in relevant chapters.

2.6.12 However, in accordance with standard practice, ES Volume 1, Chapter 7: Air Quality, Chapter 8: Noise and Vibration, and ES Chapter 15: Transport also considers a 'future baseline' which comprises the year in which the proposed development would be fully completed, occupied and operational. Accordingly, these assessments consider the following scenarios:

- Scenario 2: Future Baseline (2029) + Committed Developments;
- Scenario 3: Future Baseline (2029) + Committed Developments + Proposed Development;
- Scenario 4: Future Baseline (2041) + Committed Developments; and
- Scenario 5: Future Baseline (2041) + Committed Developments + Proposed Development.

2.6.13 Across Chapters, Scenario 1 represents the existing baseline year. For the majority of Chapters, 2025 has been used as the existing baseline year, however ES Volume 1 Chapter 7: Air Quality has used 2023 as the baseline year, as this is the latest full year for which monitoring data is available. This scenario is modelled for the purposes of model verification.

2.6.14 The future baseline for the demolition and construction stage is the year of the most intensive demolition and construction works, in terms of the number of traffic flows, as set out in ES Chapter 5: Demolition and Construction Description, unless specifically stated in a specific technical chapter.

Mitigation

2.6.15 Mitigation is the term used to refer to the process of avoiding where possible and, if not, reducing, controlling and/or off-setting the likely significant adverse effects of a development. Mitigation measures can be applied at the design stage, the demolition and construction stage, and in activities associated with the completed development.

2.6.16 As part of the ES, an iterative approach has been adopted where significant environmental effects have been avoided, where possible, in the first instance through the design refinements and iterations, as reported upon within Chapter 3: Alternatives and Design Evolution of this ES. Where adverse environmental effects were identified through early assessment work, opportunities to reduce or control impacts and effects, or in some cases, to compensate for impacts and effects, were identified and incorporated into the Proposed Development. In addition, opportunities to enhance the beneficial environmental effects of the Proposed Development have also been sought and incorporated into the Proposed Development. These are referred to as 'embedded' mitigation and will be secured through the Parameter Plans and Site Wide Design Code (WOI-HPA-DOC-SWDS-01), or secured as part of the planning permission.

2.6.17 Within each technical chapter of this ES, the assessment of the effects that are likely to arise as a consequence of a potential impact/change to environmental receptors from the Proposed Development is initially presented. If any additional mitigation measures are required, further to those already embedded into the Proposed Development throughout its evolution, these are described, and the Proposed Development is reassessed to ascertain the likely residual effects and the likely significant environmental effects. This is reported on within each technical assessment of the ES.

2.6.18 In all cases, mitigation measures are presented as embedded, specific commitments or statements of fact. It is anticipated that the implementation of mitigation identified throughout the ES would be secured by means of approval of the planning drawings, appropriately worded planning conditions, planning obligations secured pursuant to section 106 of the Town and Country Planning Act 1990, Community Infrastructure Levy Regulations 2010 (as amended) or through other statutory and building control regimes. Where the need for mitigation is identified, each assessment confirms how the mitigation would be secured as well as any monitoring measures that would be implemented and how these would be secured.

2.7 Impacts and Effects

2.7.1 As a general rule, the ES assesses the effects that are likely to arise as a consequence of a potential impact/change to environmental receptors following the application/consideration of embedded mitigation measures.

2.7.2 A range of likely type of effects have been considered (refer Table 2-4).

Table 2-4 : Range of Effects

Effect	Example
Adverse	Detrimental or negative effect to an environmental resource or receptor
Neutral	An effect that on balance, is neither beneficial nor adverse to an environmental resource or receptor OR an effect that is equally beneficial and adverse to an environmental resource or receptor
Beneficial	Advantageous or positive effect to an environmental resource or receptor

Table 2-4 : Range of Effects	
Effect	**Example**
Direct	Direct effects are those which arise as a direct consequence of a project action, e.g. the loss of habitat or the run-off of surface water to a watercourse
Indirect (secondary)	Indirect effects include, for example, the decline in the abundance of a species as a result of the loss of habitat or the damage to aquatic vegetation as a result of water pollution. Other common examples include the effect on air quality and ambient noise as a result of increased traffic flows
Cumulative	The combined effects of impacts
Inter	Effect of the project in combination of other reasonably foreseeable projects
Intra	Effect of the project in combination with each other on the same receptor
Long term	10 years +
Medium term	5-10 years
Short Term	up to 5 years
Reversible	Capable of being reversed so that the previous state or situation is restored
Irreversible	Permanent
Negligible	Imperceptible effect
Minor	Slight, very short or highly localised effect
Moderate	Limited effect (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be considered significant
Major	Considerable effect (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be more than of a local significance or lead to a breach of a recognised environmental threshold, policy, legislation or standard

2.8 Significance

2.8.1 The assessment of residual environmental effects is important in that it informs the determination by the relevant planning authority of the overall acceptability of a proposed development. Determining significance relies on accepted thresholds and criteria where available or, for situations in which such are not available, expert interpretations and value judgments.

2.8.2 Throughout this ES, the same terminology has been used to describe these individual effects, unless specific alternative terminology exists in recognised topic specific guidance, for example in ES Chapter 7: Air Quality and ES Chapter 8: Biodiversity.

2.8.3 Within this ES, significance has been evaluated with reference to definitive standards, accepted/published criteria and legislation (where available). Where it has not been possible to quantify potential impacts and residual effects, qualitative assessments have been carried out, based on expert knowledge and professional judgement. Where uncertainty exists, this has been noted in the relevant assessment and a prudent or conservative approach has been adopted so that the significance will not be under-estimated.

2.8.4 Wherever possible, the following criteria has been used:

- The sensitivity of the receptor to the change or potential impact, based on a rating of high, medium and low; and
- The magnitude of the potential impact, based on a rating of high, medium, low.

2.8.5 The specific criteria used to determine the magnitude and sensitivity of receptors are defined in each of the technical chapters.

2.8.6 A matrix is used to determine the significance of the effects (refer Table 2-5).

Table 2-5 : Scale of Effects Matrix

Magnitude of Impact	Sensitivity/Value of Receptor		
	Low	Medium	High
Low	Negligible	Negligible - Minor	Minor
Medium	Negligible- Minor	Minor	Moderate
High	Minor	Moderate	Major

2.8.7 Throughout the ES, residual effects have been predicted as either '**significant**' or '**not significant**'. Significant effects are considered material to the planning decision process (highlighted 'grey' in Table 2-5). Residual effects of moderate or major scale are considered '**significant**'.

2.9 Cumulative Assessment

2.9.1 The EIA Regulations require that all likely significant effects of a development are taken into account, including cumulative effects (refer to Table 2-4 for definition).

2.9.2 There is no prescriptive guidance on the methodology for the assessment of cumulative effects. However, the Institute of Environmental Management & Assessment (IEMA) Guidance[14] identifies two types of cumulative effects:

- **Intra Project Effects**: Combined effects of different types of impact or 'impact interactions', for example the multiplying effects arising from noise, dust and visual impacts during the construction of the Proposed Development on a particular sensitive receptor; and
- **Inter Project Effects**: Combined or additive effects generated from the Proposed Development together with other planned or likely foreseeable developments and also referred to as 'in-combination effects'. These other developments may generate their own individually insignificant effects but when considered together could amount to significant cumulative effects, for example, combined transport and accessibility impacts from two or more (proposed) developments.

Intra-Project Cumulative Effects

2.9.3 Ramboll has developed an approach which uses the defined residual effects of the Proposed Development to determine the potential for effect interactions and so the potential for intra effects of individual effects.

2.9.4 Intra-project cumulative effects from the Proposed Development itself on existing off-Site and future on-Site sensitive receptors during the demolition and construction works and also once the Proposed Development is completed, have been considered. It is possible however, that depending on the predicted individual 'completed developments' effects, only the demolition and construction work effects would actually be considered as often they generate the greatest likelihood of interactions occurring and hence significant effects. Indeed, demolition and construction effects are usually more adverse (albeit on a temporary basis) than effects as a result of a completed development.

2.9.5 Dependent on the relevant sensitive receptors, the assessment focusses either on key individual receptors or on groups considered to be most sensitive to potential interacting effects. The criteria for identifying those receptors which are considered to be potentially sensitive include existing land uses, proximity to the demolition and construction works and the Site, and likely duration of exposure to impacts.

2.9.6 It should be noted that only residual effects that are minor, moderate or major in scale have been considered within this assessment, as negligible effects are, by definition, imperceptible in their nature. Due to the 'cross-boundary' and 'overlapping' nature of these effects across

[14] Institute of Environmental Management and Assessment. The State of Environmental Impact Assessment Practice in the UK. 2011.

various environmental topics, and the assessment approach adopted, the results of intra-project cumulative effects are holistically presented within a discrete assessment chapter (ES Chapter 16: Cumulative Effects) and not within each of the technical assessment chapters. This avoids unnecessary duplication and repetition and presents a proportionate approach.

2.9.7 With regard to the potential for cumulative effects to occur, it is anticipated that standard mitigation measures as detailed in ES Chapter 5: Demolition and Construction Description of this Volume can be applied to prevent temporary significant effects from the interaction of effects occurring on-Site. An Outline Construction Environmental Management Plan (OCEMP) has been prepared alongside the ES included in ES Volume 2, ES Appendix 5.1. This would form the basis of a Site-specific Construction Environmental Management Plan (CEMP) that would be secured by HDC by means of an appropriately worded planning condition. A separate OCEMP has been prepared by Arcadis for Phase 1 (detailed component) (10051123-ARC-XXX-ZZ-TR-CM-00001).

Inter-Project Cumulative Effects

2.9.8 The EIA Regulations require an assessment of potentially significant cumulative effects of a proposed development along with other 'existing and/or approved projects'. There are no legislative or policy requirements which set out how an inter-project cumulative impact assessment should be undertaken.

2.9.9 Accordingly, inter-project effects arising from the Proposed Development in combination with, or in addition to, 'cumulative schemes' during the demolition and construction works and also once the Proposed Development is complete, have been considered in the ES.

2.9.10 Each technical ES chapter presents the assessment of combined effects of the Proposed Development with certain other cumulative schemes. Schedule 4 of the EIA Regulations states that only schemes which are existing and/or approved should be considered, i.e., schemes built or under construction or with a planning permission.

2.9.11 Spatial considerations and scale of development criteria has been developed based on professional judgement to determine whether cumulative schemes have the potential for cumulative effects when combined with the Proposed Development's effects. The schemes proposed to be included as part of the inter cumulative assessment ('committed' or 'consented' schemes') for each topic has been based on screening against a 'longlist' of schemes assessed applying the following criteria:

- minerals and waste developments; or
- significant highways, infrastructure and public transport schemes; or
- development comprising more than 10,000 sq m of gross development floor area; or
- development comprising 50 or more residential units; and
- within 5km of the Site.

2.9.12 CBC have provided comments suggesting that development comprising 5 or more residential units should be included in the 'long list' of schemes to be assessed. This is considered contrary to the usual practice of assessing inter cumulative effects and comprises a screening threshold not typically adopted. Including schemes of this size would be considered to diminish the effectiveness of the assessment by disproportionate consideration of relatively small development schemes. Therefore, it has been proposed to use the screening above which comprises 50 or more residential units.

2.9.13 Whilst not covered under the criteria as outlined herein, in the interest of adopting a precautionary approach the cumulative effects assessment has also included the proposed alterations of Gatwick Airport to support dual runway operations through the routine use of the existing northern runway and to accommodate up to 80.2 million passengers per annum, currently subject to an application for a Development Consent Order in respect of which the

Secretary of State has issued a "*minded to approve*" letter. The development is anticipated to include amendments to taxiways, terminals and ancillary facilities, highways and rivers; as well as temporary construction works, mitigation works and other associated development at Gatwick Airport.

2.9.14 The cumulative schemes have been quantitatively assessed on a topic by topics basis, subject to the availability of scheme information in the public domain. Where information is not available, qualitative approaches have been adopted based on professional judgement.

2.9.15 The list of cumulative schemes that have been considered in the ES was informed by HDC and the EIA Scoping Opinion, and agreed by the Applicant. Each technical assessor has reviewed the list and has included within their individual technical assessment those cumulative schemes which have the potential for cumulative effects. Where a cumulative scheme has been excluded, this has been clearly stated within each technical chapter with reasons why.

2.9.16 The location of the cumulative scheme considered in the ES is shown in Figure 2.1 and the description of each cumulative scheme is included in Appendix 2.3 of ES Volume 2.

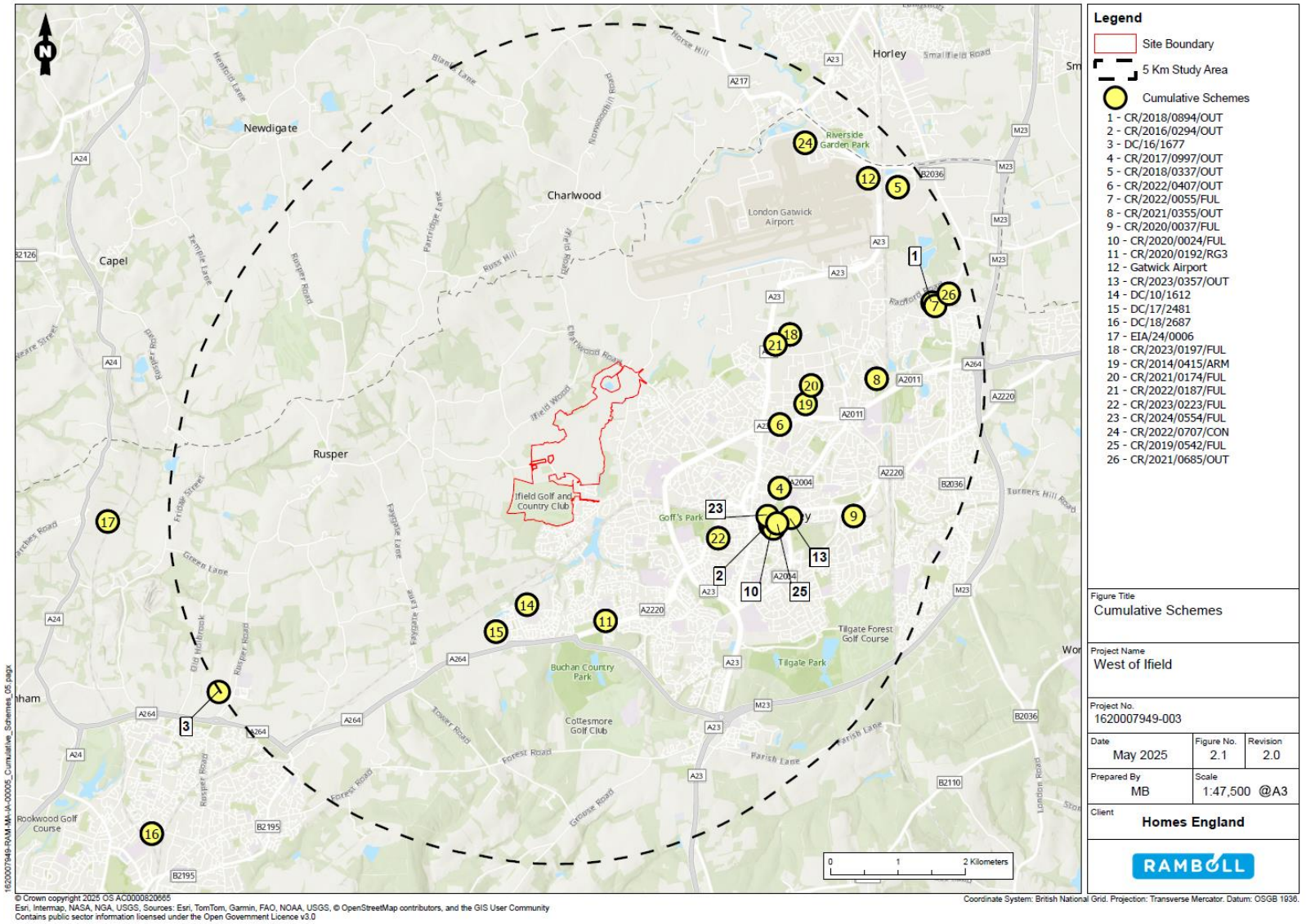


Figure 2.1: Cumulative Schemes Location

2.10 Assumptions and Limitations

2.10.1 The principal assumptions that have been made, and any limitations that have been identified, in preparing the ES are set out below. Assumptions specifically relevant to each environmental topic have been set out in each technical assessment of the ES.

2.10.2 Baseline conditions have been established from a variety of sources, including historical data, but due to the dynamic nature of certain aspects of the environment, conditions at the Site and surrounding land uses may change.

2.10.3 The assessments contained within each of the technical assessments of ES Volume 1 and within ES Volume 2 are based on the current legislative and policy framework.

2.10.4 It is assumed that information received from third parties is accurate, complete and up to date.

2.10.5 The assessments contained within each of the technical assessments of ES Volume 1 and within ES Volume 2 are based upon the application drawings submitted.

2.10.6 The assessments contained within each of the ES Volume 1 technical assessments are based on the assumption that embedded mitigation measures set out in the application drawings, are implemented through regulatory regimes or via the management controls as set out in ES Chapter 4: Proposed Development Description and ES Chapter 5: Demolition and Construction Description.

2.10.7 Construction works across the Site would take place substantially in accordance with the phasing and programme of works described in Chapter 5: Demolition and Construction Description.

2.10.8 Cumulative Schemes will be implemented substantially in accordance with information that is publicly available or that has been provided to the Applicant, and subject to the same regulatory regimes and good practice management controls.

2.10.9 Assessments have assessed the existing baseline conditions at the time of ES preparation unless otherwise stated in the technical chapter.

3 ALTERNATIVES AND DESIGN EVOLUTION

3.1 Introduction

3.1.1 The EIA Regulations requires that the Environmental Statement (ES) presents reasonable alternatives examined by the Applicant, pertinent to the Proposed Development's characteristics. These alternatives should encompass aspects such as design, technology, location, size, and scale, along with a comparison of their environmental impacts and rationale for the selected option.

3.1.2 This chapter evaluates the reasonable alternatives considered, focusing on primary land use and siting, and elucidates the reasons behind the chosen design for the Proposed Development. Additionally, it outlines how consultation has shaped the design evolution process.

3.1.3 The following alternatives were considered:

- The 'Do Nothing' scenario where the Proposed Development is not progressed;
- Alternative locations and uses; and
- Alternative design and layouts for the Proposed Development.

3.2 Legislation Policy and Guidance

3.2.1 The Town and Country Planning (Environmental Impact) Regulations 2017[1] and the National Planning Policy Framework (NPPF) 2024[2] make comment that where alternatives are considered, the EIA Regulations (Schedule 4, Part 2) state that an ES is required to provide:

'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.'

3.2.2 The Institute of Environmental Management and Assessment (IEMA) provides further guidance in terms of the best practice consideration of alternatives with respect to:

- Alternative locations;
- Alternative scales of development;
- Alternative site layouts and access arrangements;
- Different approaches to scheme design; and
- Alternative processes and alternative phasing of construction.

3.3 Alternatives

Do-Nothing Alternative

3.3.1 In the 'Do Nothing' scenario, the Site would be left in its current state and land use.

1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Schedule 4 Part 2

2 HM Government. National Planning Policy Framework, updated in December 2024, with a minor update in February 2025. Available online at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

3.3.2 In the event that the Proposed Development at the Site did not come forward, there would be a number of lost opportunities, including but not limited to:

- The opportunity to deliver new, affordable housing;
- The opportunity to provide additional capacity for local schools (primary and secondary) and primary health care facilities, as well as the provision of new retail, community and sports facilities for local communities;
- The opportunity to provide large areas of natural and semi natural green space with parks and gardens which can be publicly used for leisure and recreational activities; and
- The opportunity to maximise the productive use of the Site.

3.3.3 As outlined in the Infrastructure Delivery Plan (IDP) (WOI-HPA-DOC-IDP-01), for secondary school pupil places, there is currently limited residual capacity to support early stages of projected population growth in the development area. The immediate need for a secondary school (set out in the Crawley Infrastructure Plan (May 2023)) has been evident during the preparation of the hybrid planning application, and liaison with Horsham District Council (HDC), West Sussex County Council (WSCC) and the Department for Education.

3.3.4 In addition, as described in the IDP, there are six existing primary schools within a 2km radius of the Site. In line with guidance, at least four of the primary schools are currently operating at less than 95% capacity. Additionally, according to the WSCC Securing Sufficient Childcare in West Sussex report, WSCC is currently meeting its statutory duty to provide Early Years Funded Entitlement (EYFE) places. However, required need is expected to increase in line with projected population growth.

Alternative Sites

3.3.5 No alternative sites have been considered by the Applicant for the following reasons:

- The Site is owned by the Applicant and therefore the Applicant did not consider alternative sites which are the property of a third party[3];
- The Applicant is seeking to optimise the Site's potential in accordance with the adopted local plan and NPPF, to fulfil its role as the Government's housing and regeneration agency; and
- The Site would provide a key development opportunity for varied housing, as well as education opportunities.

3.3.6 Further details on the Site's planning context can be found in the Planning Statement.

Alternative Land Uses

3.3.7 The proposed land uses have been informed by prevailing local and national policy.

3.3.8 The evidence base for the emerging Horsham Local Plan has identified items of need, including but not limited to housing need, unmet school provision, and gypsy and traveller need. These have been discussed at pre-application meetings with HDC officers, Crawley Borough Council (CBC) and WSCC.

3.3.9 Accordingly, no other land uses were considered other than those proposed.

Alternative Layouts, Designs and Design Evolution

3.3.10 A number of masterplans for the Site have evolved since 2008[4], when the area that is broadly the current Site boundary was promoted by a Consortium including Homes England and other private interests. This work was used to promote the Site through the planning process, and broadly comprises:

- Masterplan options prepared by David Lock Associates for the Consortium (2008-10); and

[3] The majority of land has been owned by Homes England and its predecessors, since the Commission for New Towns developed by Crawley.

[4] Design and Access Statement (May 2025).

- Masterplan options prepared by Arcadis / Carter Jonas for Homes England (2016-19) to support Local Plan allocation and focused on broadly the current Site boundary for around 3,000 homes.

3.3.11 Some key drivers were established through the master planning process including:

- The broad Site area is suitable for between 2,500–3,250 new homes.
- Access will be via new road infrastructure (specifically the Crawley Western Multi-Modal Corridor (CWMMC)) that will access the Site via Charlwood Road only. There should be no private vehicular access via Rusper Road to avoid congestion within Ifield. The various iterations of masterplans all envisage safeguarding the potential future connection for the CWMMC to the A264.
- All residential accommodation will be located south of an agreed noise contour, established by Gatwick Airport, related to the potential future expansion of a southern runway.
- With the exception of the CWMMC, the residential, employment and school elements of the Proposed Development, as well as the locations of allotments and sports pitches, are proposed to be located on land outside of the extent of fluvial (river) flooding.
- Development should contain a local centre for the new homes that does not compete with other local centres.
- Development should contain a primary school and a secondary school, with the Golf Course area being the preferred location to maximise opportunity for early delivery and accessibility.

3.4 Environmental Considerations

3.4.1 Analysis of the existing Site conditions identified the key environmental and design factors that should be considered and incorporated within the design process. The following factors, in particular, have influenced the design evolution process for the Proposed Development.

Topography

3.4.2 In the area located south of Rusper Road, there exists a significant 10m variation in land elevation within the golf course land.

Drainage and Flood Risk

3.4.3 The surface water bodies of the River Mole, Ifield Brook, and Baldhorns Brook are present on-Site. On-Site there are areas of High, Medium, and Low surface water (pluvial) flood risks affecting the eastern areas of the Site. The vast majority of the Site is within a fluvial Flood Zone 1 (< 0.1% annual chance of flooding), with areas of fluvial Flood Zone 2 (0.1% annual chance of flooding) and fluvial Flood Zone 3 (1% annual chance of flooding) associated with the Ifield Brook, which runs in a northerly direction within the east side of the Site, and the River Mole, which runs through the northern portion of the Site, running in a south-west to north-east direction. There is also a potential pluvial flow pathway associated with a surface water drain running through the centre of the Site, although Environment Agency mapping is considered to overestimate the risk in this area. Further details on flood risk can be found in ES Volume 1 Chapter 14: Surface Water and ES Volume 2 Technical Appendix 14.1 Flood Risk Assessment (FRA).

Biodiversity

3.4.4 An area to the east of the Site is occupied by Ifield Brook Wood and Meadows, which adjoins a wooded area and extends into an area of ancient woodland. Bechstein's bat have been surveyed to be present within Ifield Wood off-Site to the north, and found to use other areas of woodland surrounding the Site. Ifield Brook Wood and Meadows is designated as a Local Wildlife Site (LWS) and a Site of Nature Conservation Importance (SNCI).

3.4.5 While there are no statutory ecological or landscape designations on the Site, it has biodiversity value due to the presence of notable habitats, including trees, tree groups, semi-natural grassland areas and hedgerows, as well as the potential to support protected and notable species.

Arboriculture

3.4.6 The Site comprises valuable woodlands, hedgerows, mature trees, all of which require careful offsetting and protection measures. There are four veteran trees located within the Site boundary, all located in the north of the Site and one off-Site, but adjacent, ancient tree.

3.4.7 Areas of ancient woodland are present directly adjoining the Site boundary to the north in Ifield Wood, to the west at the Grove, to the south at Hyde Hill, and to the east at Ifield Wood. Natural England and the Forestry Commission provide standing advice via the UK Government website, in the context of managing ancient woodland in regards to development. This standing advice is a material consideration, in planning policy terms. Most notably, this advice (Policy 193 of NPPF) includes the use of a 15m buffer zone from the boundary of an ancient woodland, or a Root Protection Area (RPA) calculated at 15-times the recorded stem diameter for a veteran or ancient tree.

Heritage and Archaeology

3.4.8 Ifield Village Conservation Area, is located directly east of the Site. The conservation area contains the Grade I Listed Parish Church of St. Margaret, located approximately 170m east of the Site boundary. Within the Site boundary is Ifield Golf Club Sports Hall, Ifield Golf Club Dormy House and Drughorn Memorial. Additionally within the Site is Ifield Medieval Park and six Archaeological Character Areas.

3.4.9 The 'island' in the north of the Site, outside of the Site boundary, comprises a medieval moat at Ifield Court, a scheduled monument and some agricultural and residential buildings.

Noise

3.4.10 The Site, in particularly the northern portion of the Site, is impacted by noise associated with Gatwick Airport (approximately 1km north of the Site). Residential development is considered not suitable within Gatwick Airport 60dB noise contour.

Access and Movement

3.4.11 The existing Site is largely greenfield, with limited transport infrastructure in place. However, several public rights of way (PRoWs) traverse the area, primarily running west to east. These paths cross Ifield Brook Wood and Meadows and Ifield Brook near Ifield Parish Church, and further north, they connect by Ifield Cricket Club to join the broader network of footpaths in Ifield. Used by local residents, these PRoWs provide valuable pedestrian connections across the Site and link it to the surrounding community.

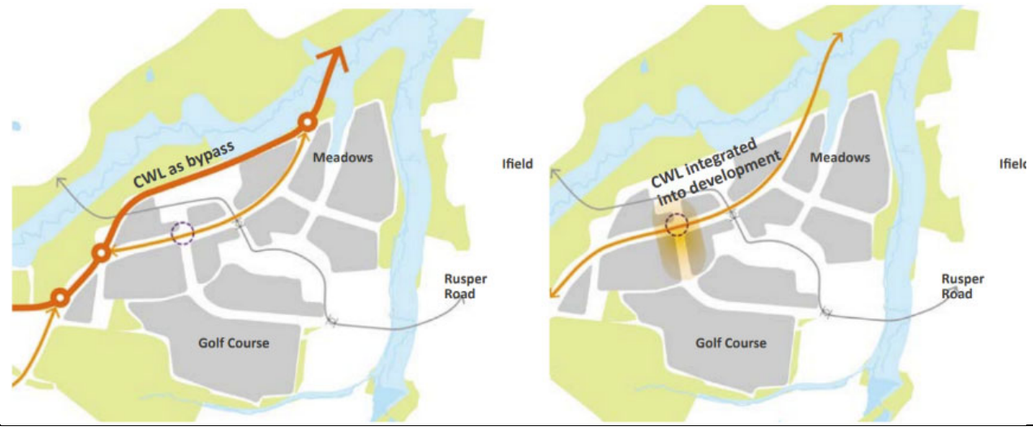
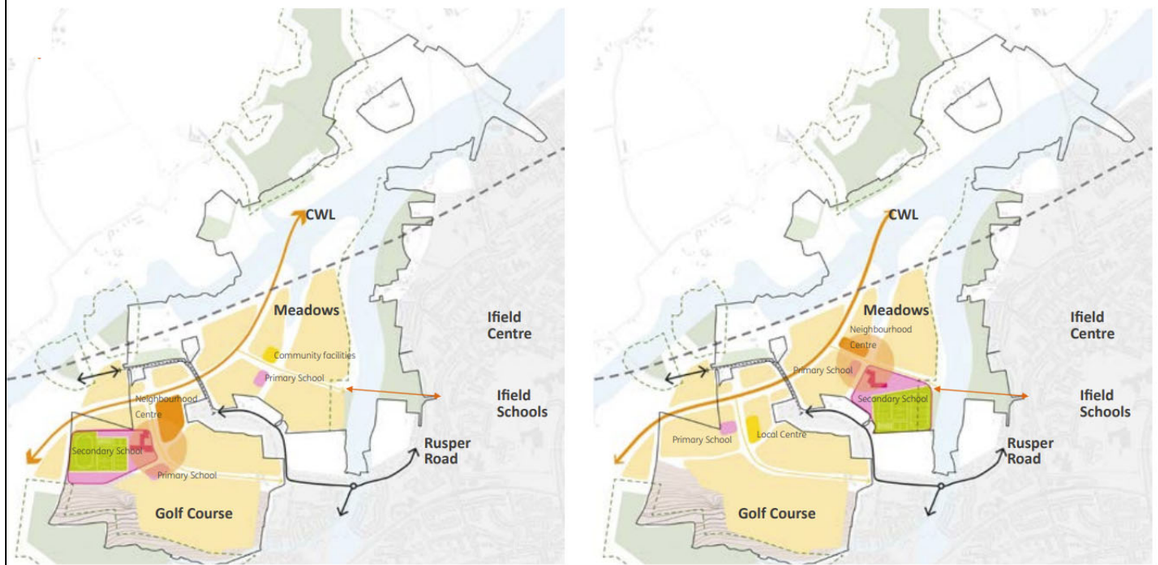
3.5 Preferred Option Scheme Evolution

3.5.1 This section provides a summary of the extensive consultation and engagement process that has informed the design process and has taken place at the pre-application stage.

3.5.2 The Applicant has been committed to ensuring its community and public engagement work is consistently inclusive and champions equality at every opportunity. The Applicant's consultation strategy has been informed by guidance set out in HDC's Statement of Community Involvement (September 2020). A detailed summary of the consultation and engagement undertaken can be found in the submitted Statement of Community Involvement (SCI) (WOI-HPA-DOC-SOP-01).

3.5.3 In early 2020, the first round of engagement with the local community and key stakeholders was held to introduce the team and the Applicant's vision for West of Ifield. Following the 2020 consultation, the team embarked on a master planning exercise that took onboard the comments received. The key considerations from this 2020 consultation are summarised in Table 3-1.

Table 3-1: Design Evolution Summary from 2020 Consultation

Key Changes	Description of Key Considerations	Figures Showing Alternatives and Design Evolution
The route of the Crawley Western Link Road (now CWMMC)	Previous iterations of the masterplan had routed the main access of the Proposed Development and the Crawley Western Link (CWL) (now the CWMMC) around the northern edge of the built development on Site, via a by-pass fast route. An alternative brought forward by the design team included the re-routing of the CWMMC through the built areas of the development. This was thought to be in-keeping with the urbanised character of the development without affecting the capacity of the corridor.	April 2020 CWMMC (previously noted as CWL) Alternatives 
Location of the Local Centre and the Schools	The re-routing of the access road and re-characterisation of the CWMMC (as an urban connector corridor) resulted in a series of different options for the wider masterplan of the Site. These options were tested for the location of the local centre and the primary school as a commercial and community cluster for the Proposed Development. Commercial advice indicated that the success of the commercial activity at the local centre would be improved by visibility of the supermarket along the main vehicular route, and it was considered important by the whole design team that the primary and secondary school should be co-located with the local centre. A smaller community cluster with a second primary school was also considered at this stage before social infrastructure testing confirmed a second primary school was not required. Two main locations were tested for the local centre and schools along the CWMCC; one in the 'Meadows' and one on the Golf Course land. It was understood that the secondary school site would need to be situated on predominantly flat land, approximately 10ha in size: • The Meadows location answered the brief in terms of the visibility of a proposed local centre, however existing landscape features meant that the schools would have to be located either side of the valley tree belt. The secondary school had good pedestrian access from Ifield, but less potential for direct public transport accessibility. • The Golf Course location situated the school and local centre with easier public transport accessibility. It also allows for potential future expansion for the school itself or the CWMMC to the west. Overall, from the 2020 consultation, the Golf Course location was preferred by the Department of Education (DfE) for the location of the secondary school, and became the preferred location for the development of the masterplan going forwards.	April 2020 School and Local Centre Alternatives 

3.5.4 During the 2020-2021 master planning process, the direction of the masterplan was also driven by a landscape character assessment and analysis. The landscape character assessment informed and helped develop four key character areas for the development with neighbourhood parks as a central feature.

3.5.5 Further to this, the existing topography of the Golf Course informed key movement networks, particularly to the south of the Site. A sustainable movement network was developed which connected existing footpaths within the Proposed Development to wider external links. Options for 'Fast Way' bus services were also explored. The agreed option allowed for buses to access the development via the CWMMC, and connects the Proposed Development to Rusper Road via a bus gate. The bus gate would preclude all other vehicular access other than emergency access.

3.5.6 Further consultations were undertaken during 2021-2023. These have been summarised in Table 3-2.

Table 3-2: 2021-2022 Consultations

Consultation Period	Description of Consultation	Response/Further Action
2021-2022	In March 2021, the second round of public engagement with the local community and key stakeholders was held online due to COVID-19 restrictions. These sessions presented the emerging masterplan and some of the technical assessments that underpinned it. At this time, the Site was still being promoted through the Horsham District Council Local Plan as a new neighbourhood containing up to 3,250 homes, schools, green spaces, and community infrastructure Some of the key issues raised in the 2021 consultation: • General principle of development, the need for additional housing and the provision of affordable housing; • Need to provide community facilities and play areas for the new development; • Need to properly plan for infrastructure such as water and power; • Loss of the countryside and habitats; • Transport proposals and the need for investment in public transport to cope with new patronage; and • Wider benefit the new development would provide, and concerns regarding the development's position in Horsham but closer to Crawley.	The masterplan was further developed after the March 2021 consultation with a focus on testing the capacity of the Site and further evidencing the technical aspects of the masterplan. Further landscape and heritage work was completed to evidence the open space story.
2022-2023	Between Thursday 20th October 2022 and Friday 11th November 2022, the Applicant undertook the third public consultation group of sessions, which took place in-person.	2023 master planning amendments took place following the October consultation sessions. The amendments included: • Additional work to further investigate appropriate locations for a Gypsy and Traveller site within the masterplan

Table 3-2: 2021-2022 Consultations		
		area that both meets the technical constraints and the needs of the end users of the site; • Additional work on the blocks in the local centre, in particular a study on how the possible supermarket block could be further developed to be more contextual and a finer grain; and • Additional study on accommodating a healthcare facility of varying sizes to meet recommendations. There have also been additional discussions with HDC and CBC regarding the development of the Design Code.

3.5.7 Following the 2022-2023 consultation activities, the Applicant has undertaken an intensive master planning process, alongside ongoing pre-application discussions with HDC and CBC as well as statutory consultees, incorporating feedback from stakeholders and the public. This process has led to several key refinements aimed at improving the sustainability, functionality, and integration of the development within its surroundings. The main changes to the masterplan (responding to concerns or feedback from previous consultation) are summarised below:

- An 8% reduction in homes being built, from 3,250 to 3,000 - with a minimum of 35% remaining as affordable housing, as per the adopted Local Plan;
- A revised Site boundary showing the extent of the proposed development area, making clear the protection of St Margaret's Church and Ifield Brook Meadows;
- Inclusion of four detailed character areas that highlight top level design aspirations, supporting infrastructure, housing mix and community uses for each area;
- Inclusion of detail around provision of new open spaces and publicly accessible areas, to support improved health and well-being for residents;
- Inclusion of habitat and ecological corridors throughout the development and enhanced green buffer zones between new and existing communities, delivering the Applicant's commitment for at least 10% gain in biodiversity in line with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021);
- Production of a clear phasing plan for the development and the supporting infrastructure. This phasing plan demonstrates a commitment to enable the building of a new secondary school and other supporting infrastructure as part of early development. Phasing plan also indicates plans to bring forward early construction of the CWMMC as the main highway access;
- Commitment to ensure the new neighbourhood is a genuinely walkable community from the very first phases, by committing to build community facilities, retail, local services and open spaces early in the phasing programme;
- Promoting use of sustainable modes of transport between the new neighbourhood, Crawley and local employment areas through the masterplan;
- Changes to Rusper Road and responding to concerns about increased congestion and 'rat-running' for those living close to the new neighbourhood; and
- Sought views on what should be included in the developing Design Code and how facilities could be best managed by the future residents as part of a stewardship strategy.

3.5.8 In 2024, consultation took place with Natural England regarding concerns with the built development located within the Hillside area, and the presence of Bechstein's bats in Hyde Hill Wood. In response to the concerns, the masterplan was further developed through revised ecological and landscape strategies. Two new options of built development within the southern portion of the Site (2a and 2b) were presented to Natural England in an online workshop on 19th September 2024. Illustrations of Options 2a and 2b which were presented to Natural England are shown in Figure 3.1

3.5.9 Following the workshop, on 11th November 2024, Natural England confirmed their recommendation of adopting Option 2b, which results in a suitable allocation of potentially high quality habitat to be maintained and enhanced to support the Bechstein's maternity colony at Hyde Hill Wood. Option 2b has been carried through to the current masterplan.

Figure 3.1: Illustrative Landscape Plan of Option 2a (left) and Option 2b (right) presented to Natural England

Consideration of Environmental Impacts with the Masterplan Design

3.5.10 Environmental impacts have been considered throughout the masterplan evolution. A summary of how and where these have been included within the existing developed masterplan is presented in Table 3-3.

Table 3-3: Scheme Design with Environmental Considerations

Environmental Consideration	Mitigation by Design
Topography	The topography of the Golf Course has informed key movement networks, particularly to the south of the Site.
Drainage and Flood Risk	The masterplan has placed the residential, employment and school elements of the Proposed Development, as well as the locations of allotments and sports pitches, on land (shown in the 2025 updated Environment Agency Flood Map for Planning) to be outside of the extent of fluvial (river) flooding during a future climate change adjusted 1 in 1,000 annual probability event, even in the absence of any catchment scale flood defence; i.e. within a fluvial Flood Zone 1. This means that the probability of fluvial (river) flooding to these parts of the Site would be low. The design of the development has integrated flood mitigation and control measures to address the risk of flooding on and off Site. Swales have been proposed to be incorporated within primary and secondary streets.
Biodiversity	The masterplan includes habitat and ecological corridors throughout the development, with enhanced green buffer zones between new and existing communities. Enhanced landscape buffers and strengthened Site-edge protections have been introduced to minimise visual and environmental impacts, creating a smooth transition between developed areas and natural habitats. The masterplan also delivers the commitment for at least 10% gain in biodiversity. High quality habitat has been maintained and enhanced in the south of the Site to support the Bechstein's bat maternity colony at Hyde Hill Wood (as approved by Natural England in November 2024). This woodland will enhance connectivity between existing wooded areas, supporting vital wildlife corridors while contributing to long-term environmental sustainability.
Landscape and Visual	The masterplan has been deigned to retain and work with the features of the landscape. The existing masterplan intends to: • Deliver 50% of the Site as public open space; • Retain Ifield Brook Wood and Meadows; • Create a new river valley country park; • Deliver local parks and allotments; • Deliver new sports and play facilities. Additionally, the existing mature landscape is the Site's greatest asset; providing the opportunity to create a development with its own unique character.
Arboriculture	The Design Code outlines the following commitments in respect to Arboriculture: • Within Natural and Sem-Natural Green Spaces, mature landscape features (trees, hedgerows etc.) must be retained and enhanced through complementary planting; • Within Hyde Hill Wood, all existing woodland and trees within the area are to be retained. New woodland planting will be provided on-Site to replace open grass areas, with glades and wet meadow interspersed throughout to maximise biodiversity and habitat potential;

Table 3-3: Scheme Design with Environmental Considerations

Environmental Consideration	Mitigation by Design
	• Within Ridgeway Park and Meadows Park, existing good quality woodland, trees and hedgerows will be protected and retained as set out in the tree removal plan ((WOI-HPA-PLAN-LRP-01); • Existing Features - Every effort must be made to protect and retain existing valuable trees and hedgerows in line with BS5837. Where tree removal is unavoidable it must be undertaken on a phased basis removing only those required for the relevant phase coming forward. The Design Code also defines the following buffers: • Ifield Brook Wood and Meadows LWS minimum 25m; • Hyde Hill LWS minimum 35m; and • Areas of adjacent Ancient Woodland – minimum of 30m, increased to 35m for Hyde Hill Ancient Woodland. The location of built development has avoided significant harm to the majority of the veteran trees on-Site and ancient woodlands =surrounding the Site, except for veteran tree T368 that will be removed. The 'wholly exceptional' circumstances for this removal is described in the Planning Statement (WOI-HPA-DOC-PS-01), which also has further details on how the masterplan has limited the loss of one On-site veteran tree, which was unavoidable, and how the Proposed Development has been purposely designed to work around the off-Site ancient tree.
Heritage and Archaeology	*Medieval moated site at Ifield Court*: The setting is protected by the proposed River Valley Park, and the retainment of the historic open parkland character around Ifield Court. The CWMMC's design has also responded to the sensitive setting through its routing and proposed landscaping. *St Margaret's Church, Ifield*: Key views from the west to the Grade I listed church, from the PRoW, are protected. The widths of the PRoW is retained as a green corridor, incorporated within the proposed urban structure. A 'pocket park' is also introduced around the view point. This 'pocket park', along with lower building heights on the eastern part of Site allows views to be retained, and provides an opportunity for people to stop and appreciate views of the church from the west. *Ifield Village Conservation Area:* The development density of the Proposed Development is lower around the eastern part of the Site to respect the conservation area and the listed buildings within. The Proposed Development would not exceed existing tree height and will be screened by mature trees within the retained Ifield Brook Wood and Meadows. Setbacks and buffering to the boundary with Ifield Brook Wood and Meadows LWS, as well as opportunities for further screening will also be introduced, as detailed in the design code. *Old Pound Cottage, Rusper Road:* The Proposed Development has been designed to have low development density around this listed building to protect its setting and manage impact from the CWMMC. *Potential archaeology where Ifield Brook joins the River Mole*: The setting of this area would be protected by the proposed River Valley Park, and the proposed flood attenuation has avoided this area.

Table 3-3: Scheme Design with Environmental Considerations

Environmental Consideration	Mitigation by Design
	Potential archaeology in Ifield Brook Meadows: Whilst not part of the Proposed Development, the Applicant proposes to separately deliver a sensitively designed east-west pedestrian / cycle connection, appropriate to the local context, across the southern part of the off-Site Ifield Brook Wood and Meadows. The proposed pedestrian and cycle route across Ifield Brook Meadows has avoided this area of interest, with a sensitive design to minimise disturbance to archaeology.
Noise	All residential plots have been located south of an agreed noise contour, established by Gatwick Airport, and agreed with HDC ad CBC. An opportunity exists to transform the area above the Gatwick 60 dB noise contour into a country park, providing a valuable green space for recreation and biodiversity which has been incorporated within Parameter Plan 1: Landscape and Public Realm (WOI-HPA-PLAN-PP01-01).
Transport	A sustainable movement network has been developed within the design of the Proposed Development which connects existing footpaths within the development to wider external links. The sustainable movement network particularly focusses on the potential pedestrian connections to Ifield and the character of Rusper Road links. Options for Fast Way bus services have also been explored. The Site and its associated infrastructure has been designed based on the latest guidance and will look to encourage new residents to use public transport and active travel (walking, cycling and wheeling) as much as possible. As shown in Parameter Plan 2: Movement and Access (WOI-HPA-PLAN-PP02-01), the design has included a comprehensive, permeable network of walking and cycling routes throughout the development, with mobility hubs throughout linking all modes of travel. Phase one of the scheme will deliver part of the CWMMC, connecting West of Ifield with Crawley and the wider area. The design of the CWMMC has considered the requirements set out by the local highway authority, makes best use of environmental features, accommodates sustainable drainage features and ensures that it will be accessible and inclusive for all. The route will vary between 20mph and 30mph and include segregated pedestrian, cycle and public transport infrastructure.

3.6 Public Engagement and Consultation

3.6.1 As described in the SCI (WOI-HPA-DOC-SOP-01), feedback from public and stakeholder consultation has been gathered on the emerging hybrid planning application plans through the following methods:

- Council and technical consultee engagement;
- Parish Council engagement;
- Member engagement;
- Local organisation engagement;
- Local business engagement; and
- Public engagement.

3.6.2 Engagement during the design evolution process has included the following key stakeholders:

- Horsham District Council;
- Crawley Borough Council (as neighbouring authority);
- West Sussex County Council;
- Natural England;
- Environment Agency;
- Lead Local Flood Authority;
- Thames Water;
- Southern Water;
- South East Rivers Trust;
- Historic England;
- Ministry off Housing, Communities & Local Government (MHCLG)
- Department for Transport
- Department for Education
- Infrastructure and Projects Authority (now National Infrastructure and Service Transformation Authority)
- Sports England and relevant sports planning consultants (as included in the Golf Needs Assessment (WOI-HPA-DOC-GOL-01));
- England Golf;
- Gatwick Airport;
- Rusper Parish Council
- Save West of Ifield;
- The Woodland Trust;
- The Land Trust;
- Active Travel England;
- Active Travel Crawley;
- Local Walking Groups;
- Local Cycling Groups;
- Councillors;
- UK Power Networks (UKPN);
- Govia Thames Railway;
- Metrobus;

- Friends, Families and Travellers (a national charity that works on behalf of Gypsy, Traveller and Roma people); and
- Local Business Owners.

3.6.3 To date, the consultation programme has included three stages of pre-application engagement activity across 2020, 2021, and 2022. An additional public exhibition event (Stage 4) was held in April 2025 to allow existing and future residents of the Proposed Development to see how previous feedback has helped shape the updated plans, learn more about the vision for a sustainable new community, and speak to representatives of the Applicant's team.

3.6.4 The key feedback raised at these consultations can be summarised as follows:

- The need for local housing;
- The local benefit: creating a community, providing infrastructure and the development timeline;
- High quality design and the design code;
- Open space and stewardship, environment, energy and zero carbon;
- Sustainable transport, road infrastructure and parking provision; and
- Flooding and water neutrality.

3.7 Conclusion

3.7.1 The Applicant's objective for the Proposed Development is to deliver sustainable homes and work places within an expansive network of green spaces, while also providing easy access to amenities in the neighbourhood, in line with Homes England's role as the Government's housing and regeneration agency which includes to accelerate the pace of house building and regeneration across the country, to deliver homes and places people are proud to live in – for generations to come.

3.7.2 The reasonable alternatives and parameter layouts were explored in the context of physical and environmental considerations, effects and constraints. No alternative sites were considered for the Proposed Development as the Site is owned[5] by the Applicant.

3.7.3 The design process has been iterative, responding to the numerous opportunities and constraints on-Site and in the surrounding area.

3.7.4 This has led to the final design proposals for the Proposed Development which provides a number of environmental benefits including:

- Sensitive design to incorporate and enhance the surrounding rural landscape, communities and heritage assets;
- Protects and enhances the value of key ecological and landscape features at the Site through provision of new habitats, buffers and protection of existing sensitive features;
- Provides at least 10% biodiversity net gain;
- Avoidance of built development within high risk fluvial flood zones and within noise contours from Gatwick Airport;
- Accommodates new and activate forms of transport, and supports active health lifestyles for residents;
- Provision of a range and mix of tenures and typologies of homes;
- Prevision of a range of recreation, educational and community facilities on Site.

[5] 97% owned and 3% within the control of the Applicant (under option)

4 PROPOSED DEVELOPMENT DESCRIPTION

4.1 Introduction

4.1.1 This chapter of the ES provides a description of the Proposed Development for the purposes of identifying and assessing the potential environmental impacts and likely environmental effects of the completed development stage in the technical assessments of ES Volume 1 (Chapters 6-15).

4.1.2 In accordance with the EIA Regulations, this chapter sets out the physical characteristics of the Proposed Development; the main characteristics of the completed development stage; as well as estimations of the resources, emissions, residues and wastes envisaged as part of the Proposed Development.

4.1.3 The Site is described in ES Chapter 1: Introduction, with more detailed information provided in each technical assessment within ES Volume 1.

4.1.4 The demolition and construction works of the Proposed Development are described in ES Volume 1 Chapter 5: Demolition and Construction Description.

4.1.5 Further detailed information on the Proposed Development can be found within the following planning application documents which have formed the basis this chapter's content:

- Design and Access Statement (DAS) ((WOI-HPA-DOC-DAS-01);
- Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01);
- Landscape and Public Realm Parameter Plan (WOI-HPA-PLAN-PP01-01);
- Movement and Access Parameter Plan (WOI-HPA-PLAN-PP01-01);
- Land Use Parameter Plan (WOI-HPA-PLAN-PP01-01);
- Building Heights Parameter Plan (WOI-HPA-PLAN-PP01-01);
- Site-Wide Design Code (WOI-HPA-DOC-SWDC-01);
- Transport Assessment (WOI-HPA-DOC-TA-01);
- Framework Travel Plan (WOI-HPA-DOC-FTP-01)
- Energy Statement (WOI-HPA-DOC-ENE-01);
- Employment and Economic Development Strategy (WOI-HPA-DOC-EDS-01);
- Sustainability Statement (WOI-HPA-DOC-SUS-01); and
- Utilities Statement (WOI-HPA-DOC-UTI-01).

4.2 Planning Application

Proposed Development Description

4.2.1 This planning application seeks hybrid planning permission (part outline and part full planning permission) for a phased mixed-use development at land west of Ifield. The area to be redeveloped is shown within the Planning Application Boundary Plan (drawing ref. WOI-HPA-PLAN-PAB-01).

4.2.2 The full element covers enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works .

4.2.3 The outline element (with all matters reserved) of the Proposed Development comprises up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. .

4.2.4 The hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.

4.2.5 Further details on the Proposed Development, the description of development and the proposed land uses are set out within the Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01) and the Design and Access Statement (WOI-HPA-DOC-DAS-01).

4.2.6 In summary, the full (phase 1) element of the Proposed Development would comprise:

- Delivery of the first phase of the Crawley Western Multi-Modal Corridor (CWMMC), a new road with a dedicated bus lane and regular traffic lane in each direction, to form a connection from Charlwood Road to the east and the primary access route to the development.
- A primary street forming a spine road incorporating primary and secondary street connections, together with parking and loading bays, street lighting and fixtures.
- Active travel provision with dedicated cycle ways and footways within the primary street.
- Mobility hubs and provision for bus transport with bus stops, car club bays, and bus priority through a bus-only connection to Rusper Road in the east.
- Bridge crossing of the River Mole.
- Site clearance and enabling works, including utilities diversions.
- Utilities, surface and foul drainage infrastructure to service the planned development plots.
- Landscape works incorporating sustainable urban drainage system (SuDS) corridors, flood mitigation features, ecological mitigation and enhancement, noise mitigation (including noise bund) and soft landscaping.
- Local amendments to existing public rights of way.

4.2.7 The outline element of the Proposed Development will include:

- Phased mixed use development of up to 3,000 homes, including a range of flats and houses, of which 35% will be affordable.
- Neighbourhood centre and associated community facilities, including a primary and secondary school, and minimum commitments to health centre, community centre, early year nursery and Local Leisure facility, alongside small scale centre uses including retail and potential hotel.
- Employment uses including flexible office and innovation space, alongside general industrial and logistics space across the neighbourhood centre and in the River Valley character area (refer to section 4.3 of this chapter for further details about character areas).
- Allowances for the potential delivery of specialist accommodation to suit older persons, as well as up to 15 gypsy and traveller pitches and commitments to Custom and Self build housing.
- Public open space and multifunctional green space with allotments, sports pitches, including a new sports hub, recreation, amenity green space play and ancillary facilities, retained landscape features, a minimum of 10% net gain in biodiversity, and strategic green space commitments.
- Allowances for key infrastructure and utilities, notably to achieve water neutrality including water treatment works and abstraction boreholes.

- The prioritisation of more sustainable travel modes and facilitated active mode connections, including an off-Site pedestrian and cycle link across Ifield Meadows, off-Site improvements to connect to Ifield station via public transport and cycle links, and through safeguarded expansion to multi-modal corridor provided under the detailed element.

4.2.8 The proposed buildings would be up to 20 m above ordnance datum (AOD) tall from existing Site levels.

4.2.9 A proposed pedestrian / cycle link through Ifield Brook Wood and Meadows to the east of the Site forms part of the off-Site mitigation package for the Proposed Development. The proposed east-west pedestrian / cycle connection which will run across the southern part of Ifield Brook Wood and Meadows. The proposed pedestrian / cycle link is located outside of the Site boundary on land within Crawley Borough Council. The link will be secured pursuant to a specific Section 106 obligation. Ifield Brook Wood and Meadows is within Homes England's ownership, as shown in Land Ownership Plan (WOI-HPA-PLAN-BLU-01), and therefore its delivery can be secured via an obligation associated with the hybrid planning application

4.2.10 The detailed layout, scale, appearance and landscaping of the outline component are subject to reserved matters. Accordingly, for these matters, the following main parameters have been set within which the subsequent reserved matters applications (RMAs) would be brought forward:

- Landscape and Public Realm;
- Movement and Access;
- Land-use; and
- Building Heights.

4.2.11 These parameters are illustrated in parameter plans summarised in Table 4.1.

Table 4.1: Schedule of Parameter Plans

Drawing Number	Name	ES Figure
WOI-HPA-PLAN-PP01-01	Parameter Plan 1 - Landscape and Public Realm	Figure 4.4
WOI-HPA-PLAN-PP02-01	Parameter Plan 2 - Movement and Access	Figure 4.5
WOI-HPA-PLAN-PP03-01	Parameter Plan 3 - Land Use	Figure 4.2
WOI-HPA-PLAN-PP04-01	Parameter Plan 4 - Building Height	Figure 4.3

4.3 Site Arrangement

4.3.1 As set out in the Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01) and shown in Figure 4.1, the Proposed Development would deliver the following four 'Character Areas':

- **Neighbourhood Centre:** Located in the western part of the Proposed Development, this Character Area would comprise a mixed use, residential, and educational uses;
- **River Valley:** Located in the central part of the Proposed Development, this Character Area allows for the delivery of a flexible employment and residential neighbourhood;
- **The Meadows:** Located the eastern part of the Proposed Development, this Character Area would comprise a new residential neighbourhood and areas considered appropriate for gypsy and traveller pitches; and
- **Hillside and Woodlands**: Located in the southern part of the Proposed Development, this Character Area would be a residential neighbourhood.

4.3.2 North of the four Character Areas, the Proposed Development would retain a natural and semi-natural green space, with the River Mole flowing through the Proposed Development from west to east.

4.3.3 The Proposed Development would comprise the CWMMC that would connect to Charlwood Road in the north-east of the Site and run on a south-west to north-east orientation to the eastern boundary. The route of the CWMMC would intersect the natural and semi-natural green space, divide the River Valley Character Area from the Meadows Character Area and intersect the Neighbourhood Centre Character Area.

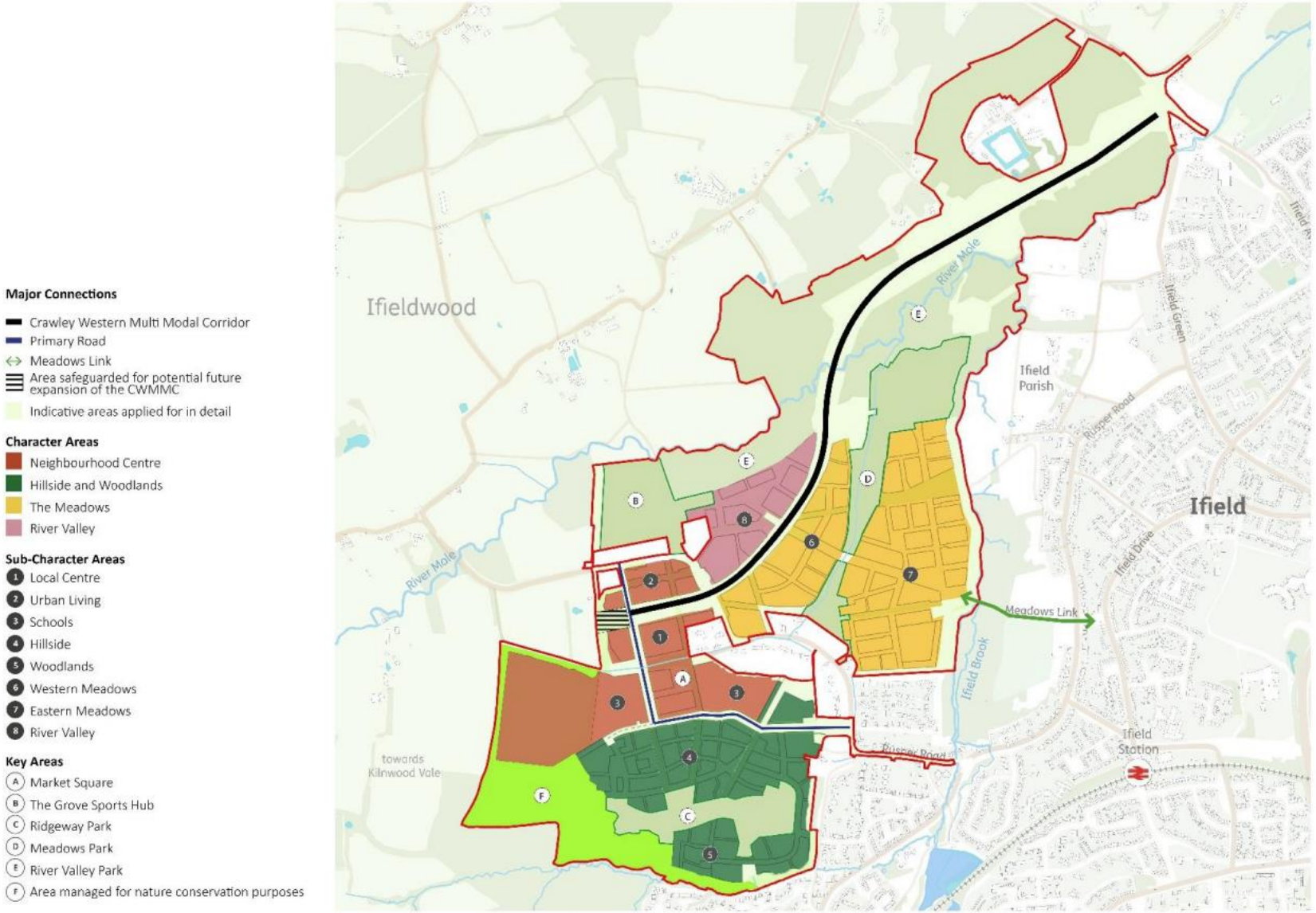


Figure 4.1: Hybrid Planning Application Context Plan

4.4 Land-use

Land-Use Schedule

4.4.1 The land-use schedule for the Proposed Development is presented in Table 4.2, which includes breakdown of the assumed minimum and maximum floorspace.

Table 4.2: Proposed Development Land-Use Schedule

Use Class	Max Total Sqm (GEA) / units / ha	Sub-Class (where relevant)	Minimum Or Maximum Floorspace (GEA) to be enforced as part of S106 (where relevant)
Class E – Commercial, Business and Service.	Up to 40,130 sqm	E(a) Display or retail sale of goods, other than hot drinks	Maximum of 5,200 sqm can be provided for Class E(a) uses
		E(b) Sale of food and drink for consumption (mostly) on the premises	-
		E(c) Provision of: • [i] Financial services, • [ii] Professional services (other than health or medical services), or • [iii] Other appropriate services in a commercial, business or service locality	-
		Class E(d) Indoor sport, recreation or fitness	Minimum of 3,400sqm provided as a Local Leisure Facility
		Class E(e) Provision of medical or health services	Minimum of 1,500sqm to be provided for healthcare-related uses
		Class E(f) Creche, day nursery or day centre	Minimum of 1,100sqm to be provided as a private early years facility
		E (g) Uses which can be carried out in a residential area without detriment to its amenity: • (i) Offices to carry out any operational or administrative functions, • (ii) Research and development of products or processes, • (iii) Industrial processes	-
Class B2 – General Industrial	Up to 5,200 sqm	N/A	-
Class B8- Storage or distribution	Up to 7,200 sqm	N/A	
Class C1 - Hotels	Up to 80 beds	N/A	-
Class C2/C3 - Residential Institutions / Dwellinghouses	Up to 3,000 homes	-	-
Sui Generis – Gypsy and Traveller Pitches	Up to 15 pitches	-	-

Table 4.2: Proposed Development Land-Use Schedule			
F1 – Learning and Non-residential Institutions	Up to 11.75 ha	3 form entry (FE) Primary School in Plot Q1 including 1 x Early Years Nursery and Student Support Centre.	A minimum site of 2.4ha to be provided
		6-8 FE Secondary School including sixth form	A minimum site of 9.29 ha to be provided
F2 – Local Community	Up to 1,200 sqm	Class F2(b)- Halls or meeting places for the principal use of the local community	Minimum of 600sqm to be provided for community uses

Proposed Housing and Tenure Mix

4.4.2 The outline element of the Proposed Development would provide up to 3,000 residential homes with provision 35% affordable units. Homes would be provided through a range of residential types including 1-beds to 4 + bed homes. The indicative proposed housing and tenure mix is presented in Table 4.3.

Table 4.3: Indicative Proposed Unit and Tenure Mix[1]

Number of Bedrooms		Affordable Rent		Shared Ownership		Open Market Housing		Total number of Homes
		Number of Units	% of Units	Number of Units	% of Units	Number of Units	% Of Units	
Flat	1-Bed	235	7.83	79	2.63	136	4.53	450
	2-Bed	165	5.50	60	2.00	382	12.73	607
House	2-Bed	55	1.83	60	2.00	164	5.47	279
	3-Bed	206	6.87	85	2.83	780	26.00	1071
	4 +Bed	74	2.47	31	1.03	488	16.27	593
Total		**735**	**24.50**	**315**	**10.50**	**1950**	**65.00**	**3000**

4.4.3 The Proposed Development would include 100% of affordable dwellings to be M4(2)[2] with 5% of affordable dwellings to be M4(3)[3]. All units would meet Nationally Described Space Standards.

Land Use Distribution

4.4.4 As stated in the Site Arrangement section of this chapter (Section 4.3), the Proposed Development would comprise four main Character Areas (i.e. Neighbourhood Centre, River Valley, The Meadows, and Hillside and Woodlands). These Character Areas would be further divided into multiple plots with the following land-use designations, as illustrated in Parameter Plan 3: Land Use (WOI-HPA-PLAN-PPP03-01):

- The Neighbourhood Centre is divided into 11 plots, numbered NC 1 to NC 11. Plots NC 1 to NC 5 are designated for residential land use (Use Classes C2, C3, and Sui Generis), plots NC 6 to NC 9 are designated for mixed-use land use (Use Classes C1, C2, C3, F1, F2, E, and Sui Generis), and plots NC 10 and 11 are designated for School land use (Use Class F1);
- River Valley is divided into three plots: RV 1, RV 2, and RV 3. Plot RV 1 and RV 2 are designated for flexible employment/residential land use (Use Classes C1, C2, C3, E, B2, and Sui Generis), and RV 3 is designated for employment land use (Use Classes E, B2, B8);
- The Meadows is divided into eight plots, numbered M 1 to M 8, all designated for residential land use (Use Classes C2, C3, and Sui Generis) and areas of M 7 and M 8 are designated for residential land use (Use Class C2, C3, Sui Generis) also considered appropriate for gypsy and traveller pitches; and

[1] Indicative mix provided to Ramboll by Prior and Partners

[2] Accessible and adaptable dwellings (M4(2) of Building Regulations Approved Document M)

[3] Wheelchair user dwellings (M4(3) of Building Regulations Approved Document M)

- Hillside and Woodlands is divided into seven plots, numbered HW 1 to HW 7, all designated for residential land use (Use Classes C2, C3, and Sui Generis).

4.4.5 The indicative land-use in each of the Character Areas is summarised in Table 4.4 and shown in Figure 4.2.

Table 4.4: Land-Use Distribution per Class

Use Class	Further Description	Acceptable in the Following Character Areas			
		Neighbourhood Centre	River Valley	Meadow View	Hillside and Woodland
Class E – Commercial, Business and Service.	N/A	Yes	Yes	No	No
Class B2 - General Industrial	N/A	No	Yes	No	No
Class B8 - Storage or distribution	N/A	No	Yes	No	No
Class C1 - Hotels	N/A	Yes	Yes	No	No
Class C2/C3 – Residential Institutions / Dwelling Houses	N/A	Yes	Yes	Yes	Yes
Sui Generis – Gypsy and Traveller Pitches	N/A	No	No	Yes	No
F1 – Learning and Non-residential Institutions	3 FE Primary School including 1 x Early Years Nursery and Student Support Centre.	Yes	No	No	No
	6-8 FE Secondary School including sixth form	Yes	No	No	No
F2 – Local Community	Class F2(b)- Halls or meeting places for the principal use of the local community	Yes	No	No	No
Based on Parameter Plan 3: Land Use (WOI-HPA-PLAN-PP03-01)					

4.4.6 Whilst the majority of buildings will be limited to the principal building zone, ancillary buildings required to serve the areas of landscape and the scheme, such as utility buildings as part of the water neutrality strategy or sports pavilions to service the sports pitches, will be allowable within the areas of landscape and identified at the reserved matters application stage.

4.4.7 As described in the Employment and Economic Development Strategy (EEDS) (WOI-HA-DOC-EDS-01), the new Neighbourhood Centre is proposed as a major component of the new community, and is anticipated to produce some significant employment generating uses. The proposed centre is intended to be focused on a market square, with significant public transport provision and an intimate Community Square, adjacent to the two new schools (Primary and Secondary). The Neighbourhood Centre would also look to provide a mix of uses and facilities to support the area including community uses, a new health centre, commercial / retail uses, and business uses (innovation based), all alongside the proposed CWMMC and wider residential development.

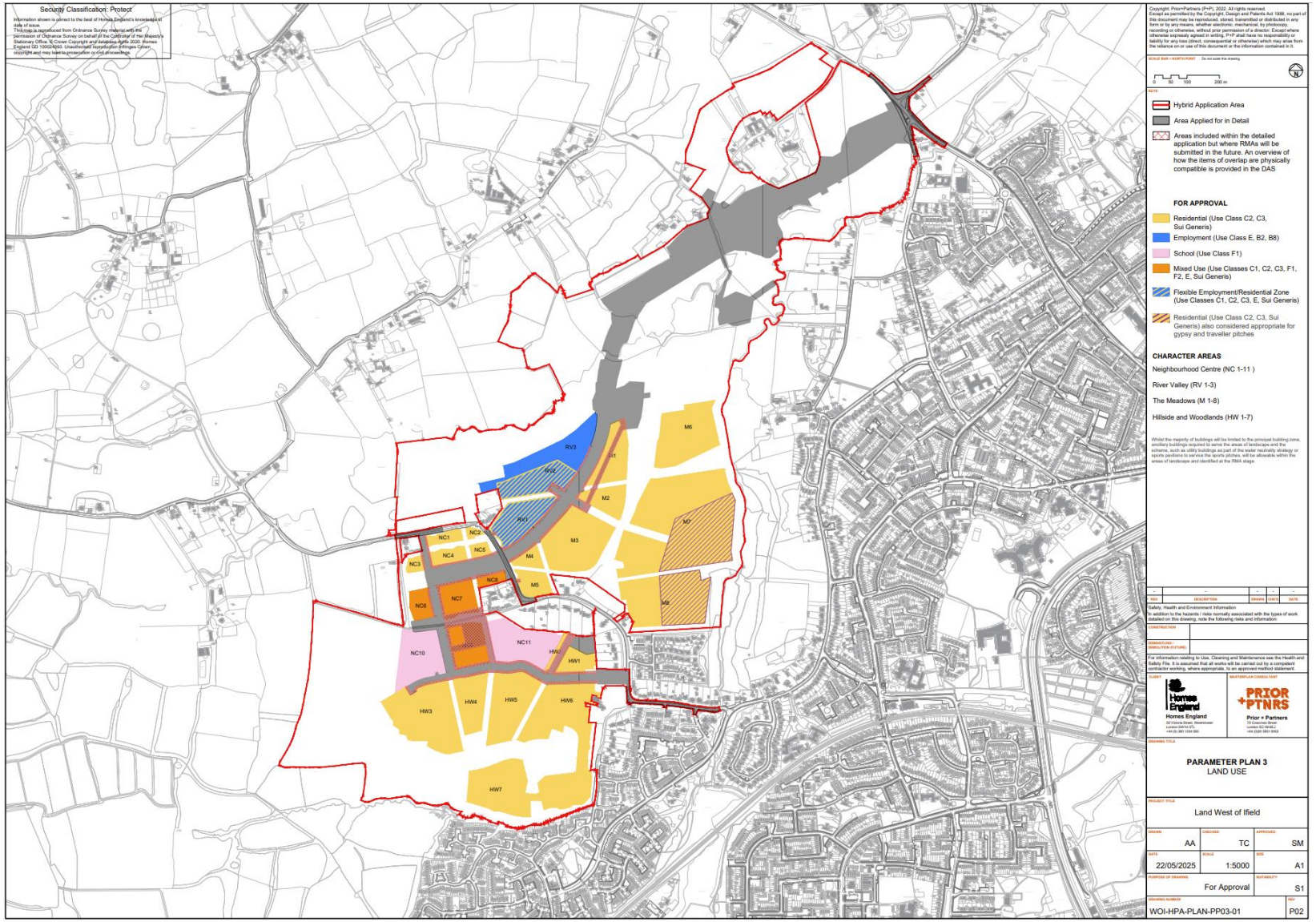


Figure 4.2: Land-Use Parameter Plan (Parameter Plan 3: Land Use. WOI-HPA-PLAN-PP03-01)

4.5 Built Form, Height and Massing

4.5.1 The proposed maximum height parameters of the Proposed Development are presented in Figure 4.3. The maximum height parameters of the Proposed Development range from 6 m AOD to 20 m AOD. Apartment buildings will predominantly cluster in the local centre and along the CWMMC, while low-rise buildings will be situated close to natural landscapes.

4.5.2 Table 4.5 summarises the maximum height parameters for the plots in each of the Character Areas.

Table 4.5: Proposed Maximum Plot Heights and Indicative Number of Storeys

Plots	Max Heights (m AOD)*	Indicative Storey Number**
Neighbourhood Centre		
NC 1	14	2-3
NC 2	14	2-3
NC 3	20	4-5
NC 4	20	4-5
NC 5	20	4-5
NC 6	20	4-5
NC 7	20	4-5
NC 8	14-20	2-5
NC 9	20	4-5
NC 10	18	4-5
NC 11	14	2-3
River Valley		
RV 1	20	4-5
RV 2	18	4-5
RV 3	10-18	2-5
The Meadows		
M 1	16	3-4
M 2	16	3-4
M 3	16	3-4
M 4	16	3-4
M 5	16	3-4
M 6	14	2-3
M 7	14-16	3-4
M 8	14	2-3
Hillside and Woodlands		
HW 1	16	3-4
HW 2	16	3-4
HW 3	16	3-4
HW 4	16	3-4
HW 5	16	3-4
HW 6	14-16	3-4
HW 7	14-16	3-4

*Heights are shown in metres Above Ordinance Datum (AOD) from existing Site levels, plus an additional allowance of +/- 300mm to allow for earth modelling during detailed design. There is also an allowance of +1100mm above the maximum height level to accommodate lift overruns and roof top plant.

** Although not fixed as part of the Parameter Plan and further outlined in the Site Wide Design Code, the 10-14m limit is broadly equivalent to two storeys or three storeys, the 14-17m limit to three to four storeys, and 18-20m to four or five storeys.

Maximum heights have been based on the information provided in Parameter Plan 4 (Building Heights, WOI-HPA-PLAN-PP04-01).

4.5.3 The parameter heights are shown in Figure 4.3 and represent a maximum within which the detailed proposals would come forward. These heights do not represent the actual form in which the Proposed Development is likely to be delivered.

4.5.4 The Design Code makes commitments in respect of how the built form, height and massing of the outline component could be delivered at the detailed design stage to facilitate a high quality development.

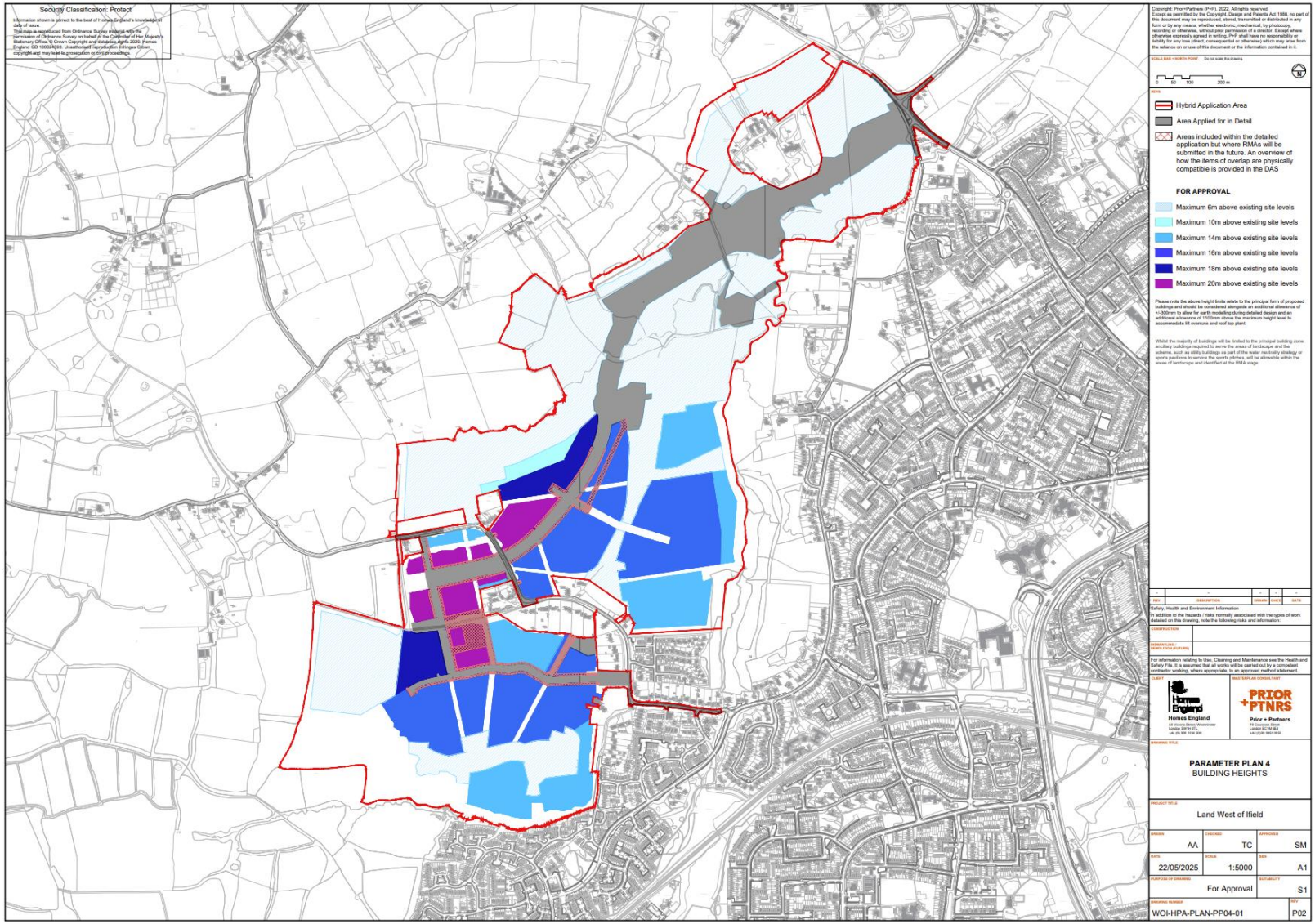


Figure 4.3: Proposed Building Heights Parameter (Parameter Plan 4: Building Heights, WOI-HPA-PLAN-PP04-01)

4.6 Material Palette and Façade Detailing

4.6.1 In regard to the Outline Component, a material palette and façade detailing strategy would be adopted in accordance with the Design Code. This will be further detailed at reserved matters stage and would be assumed to be in keeping with the surrounding built development.

4.7 Landscape and Public Realm

4.7.1 Figure 4.4 shows the indicative landscape and public realm plan for the Proposed Development, and identifies the minimum area of green infrastructure to be created as a result of the Proposed Development.

4.7.2 Figure 4.4 shows the proposed strategic green infrastructure to be implemented, including natural and semi-natural green space, ecological buffers, connective green infrastructure, parks and gardens, and areas managed for nature conservation purposes.

4.7.3 In order to create buffers between the Character Areas and the Site boundary, landscape ecological buffers would be implemented predominately along the Proposed Development's eastern, western, and southern boundaries, adjacent to build infrastructure.

4.7.4 The strategic green infrastructure encompasses natural and semi-natural green spaces in the northern part of the Proposed Development and areas managed for nature conservation purposes in the southern part of the Proposed Development.

4.7.5 In addition to the strategic green infrastructure, additional green infrastructure has also been shown in Figure 4.4. (Parameter Plan 1) which includes indicative locations for allotments, Neighbourhood Equipped Area for Play (NEAP), Local Equipped Area for Play (LEAP), youth areas and facilities, sport pitches, tennis and multi-courts, and public squares. The exact locations and designs of the additional green infrastructure sites will be established during the detailed design at the reserved matters stage. These areas are to be delivered in areas of strategic infrastructure and on plot as appropriate.

4.7.6 Table 4.6 summarises the minimum commitments for landscape and open space standards that the Proposed Development would deliver.

Table 4.6: Landscape and Public Realm Provisions

Typology	Minimum Requirements	Estimated Requirement (based on population of 6, 725[4]) in Ha
Strategic Green Infrastructure		
Natural and Semi Natural Green Space	24.3 m^2 per resident	16.34
Amenity Greenspace	5.8 m^2 per resident	3.9
Parks and Gardens (includes outdoor sports[5])	13.8 m^2 per resident	9.28
Allotment	1.8 m^2 per resident	1.21
Children Playparks (playgrounds/landscaped areas of play)	0.5 m^2 per resident	0.33
Youth Areas and Facilities	0.4 m^2 per resident	0.27
Additional Green Infrastructure Types Not Included within Above Categories[6]		
Provision within illustrative Masterplan (ha)		Commentary

[4] Indicative population number based on up to 3,000 homes, provided to Ramboll by Prior and Partners.

[5] Includes Grass Pitches and Artificial Pitches, Tennis and Bowling

[6] As shown on the Landscape and Public Realm Parameter Plan (Parameter Plan 3: WOI-HPA-PLAN-PP03-01)

Table 4.6: Landscape and Public Realm Provisions		
Area Identified for Natural Conservation and Management	11.2	These areas, when added to the other figures above, cover the full open space set out in the Parameter Plans. Further details on the exact scale of these areas will be refined at the RMA stage.
Areas within the Ecology Buffers	8.23	
Secondary School Open Space[7]	6.9	

On-Plot Green Infrastructure

4.7.7 The Proposed Developments on-plot green infrastructure would be delivered with current best practice and guidance at the reserved matters stage.

[7] Public access to this area will be explored through a Community Use Agreement

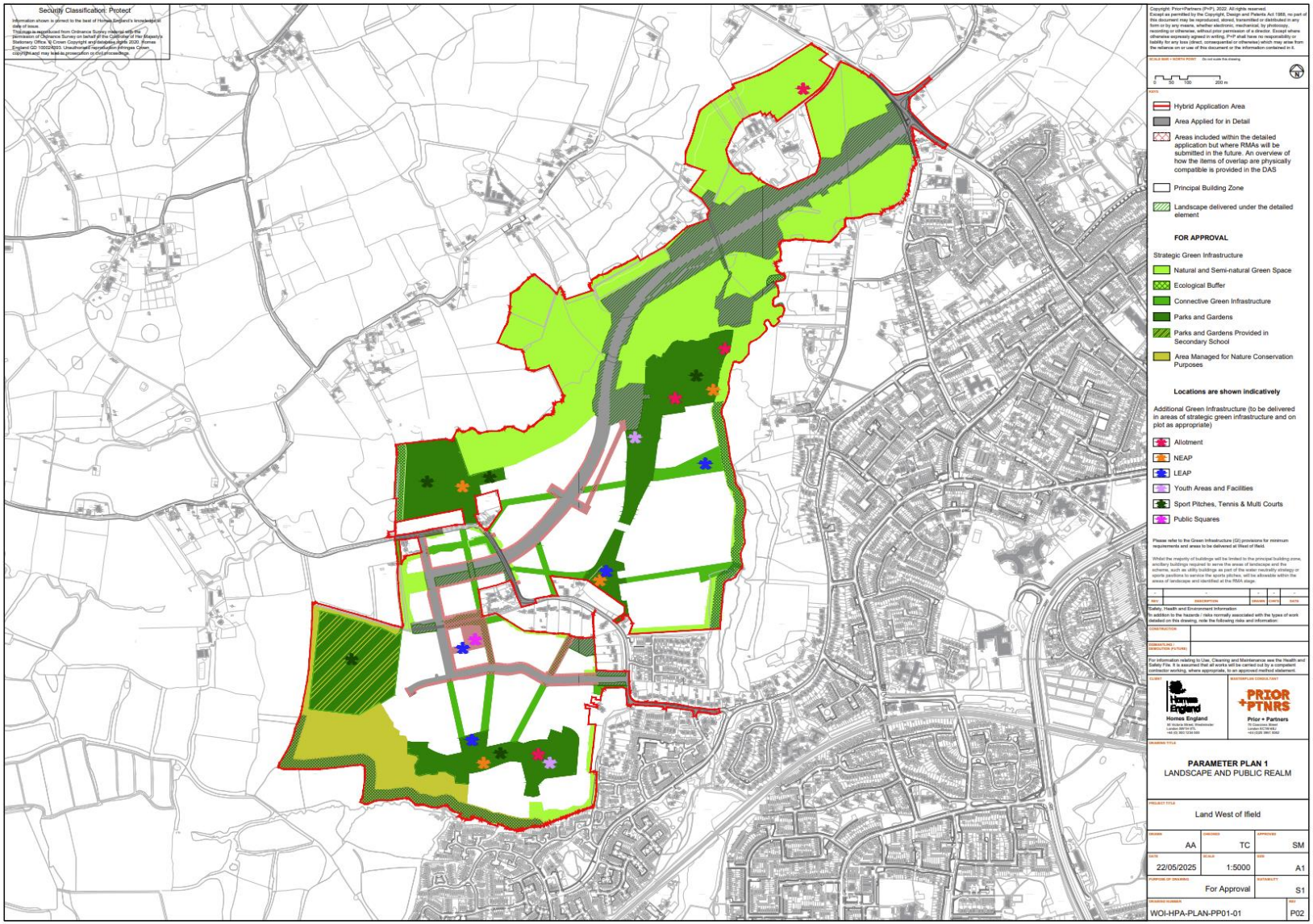


Figure 4.4: Landscape and Public Realm (Parameter Plan 1: Landscape and Public Realm, WOI-HPA-PLAN-PP01-01)

4.8 Landscape and Visual

4.8.1 The Proposed Development would be phased, with the emerging buildings being increasingly visible during construction. Once completed, the Proposed Development would be seen as a permanent part of the landscape.

4.8.2 Construction of the Proposed Development would change the existing landscape baseline through replacing rural farmland and a golf course with new built infrastructure comprising residential, commercial, retail, education and community use, as well as new road infrastructure (CWMMC).

4.8.3 Over time, and with the maturing of the landscape proposals, the level of adverse effect would reduce slightly. The landscape along the River Mole would benefit from the maturing of the new green infrastructure associated with the Proposed Development for Phase 1 which includes the CWMMC and associated landscape strategy. Additionally, the wider character area beyond the Site would not experience significant effects due to the high level of visual containment of the Site from existing boundary trees and hedgerows. Further details on landscape and visual impacts can be found in ES Volume 1 Chapter 11: Landscape and Visual Impact.

4.9 Lighting Strategy

4.9.1 A lighting assessment (WOI-HPA-DOC-LIG-01) has been prepared for the Proposed Development. This will be submitted with the hybrid planning application as a standalone report. Following the implementation of mitigation measures, the levels of light as a result of the Proposed Development would increase from the baseline, however it is not likely to be obtrusive in nature. The lighting assessment has looked at measures to minimise impacts to on-Site and surrounding ecological receptors, including bats and other light sensitive species. Sensitive human amenity receptors have also been assessed.

4.9.2 It is proposed that the proposed lighting for the Proposed Development would be implemented in line with relevant British Standards and guidance through the implementation of an appropriate lighting design, which would align with the proposed outline lighting strategy and secured via an appropriately worded planning condition.

4.10 Access

4.10.1 Figure 4.5 shows the parameters for movement and access for the Proposed Development. This identifies a new network of vehicular accesses, public transport corridors, and areas for pedestrian and cycle movements within the Proposed Development. There is significant potential for using active modes as a primary choice of travel from the Site for external trips given its proximity to key transport nodes, employment centres and surrounding amenities.

4.10.2 As noted in the Site-Wide Design Code (WOI-HPA-DOC-SWDC-01), the design of the transport and street networks must reflect the modal hierarchy, which is based on maximising active travel and minimising the need for day-to-day car use. The hierarchy is as follows (most important first):

- Walking;
- Cycling;
- Public Transport Service (Local Bus);
- Shared Vehicles and Taxis;
- Service and logistics vehicles; and
- Private cars.

4.10.3 The design of the streets within the outline component would be informed by the design requirements outlined in the Site-Wide Design Code (WOI-HPA-DOC-SWDC-01). Streets must be designed as shared spaces accommodating all individuals, not exclusively for vehicular use. Designing them to support reduced vehicle speeds (typically around 20mph), prioritises a human-focused environment in adherence to street design standards.

Vehicle Access

4.10.4 Access to the Proposed Development by vehicle would be via the new CWMMC and the Primary Street. The CWMMC corridor would function as a vital transportation artery, beginning at its junction with Charlwood Road and extending south-west for approximately 2.5 kilometres. The CWMMC is designed to support multiple modes of transport — including vehicles, buses, cyclists, and pedestrians — demonstrating a strong commitment to sustainable, multimodal mobility solutions.

4.10.5 The Primary Street would be a vital component of the transportation infrastructure, connecting directly to the western end of the CWMMC. The corridor has been designed to support various modes of transportation, including vehicle, buses, cyclists, and pedestrians ensuring efficient movement throughout the area.

4.10.6 The Phase 1 Primary Street has been designed to function as a primary bus route, connecting with the CWMMC and facilitating access to the Rusper Road bus gate, as shown in Figure 4.7. This connection is critical for accommodating the planned high-frequency bus services that would enter the Site from the east, ensuring efficient and reliable public transportation for the new development. By integrating these services, the Primary Street would play a central role in connecting the new community to the broader regional transport network, promoting accessibility and reducing reliance on private vehicles.

4.10.7 In order to reduce the impact of any vehicular traffic on the existing Ifield neighbourhood and to improve the walking and cycling environment from the Proposed Development to Ifield Station, the existing Rusper Road would no longer provide through access nor provide access to and from the Proposed Development.

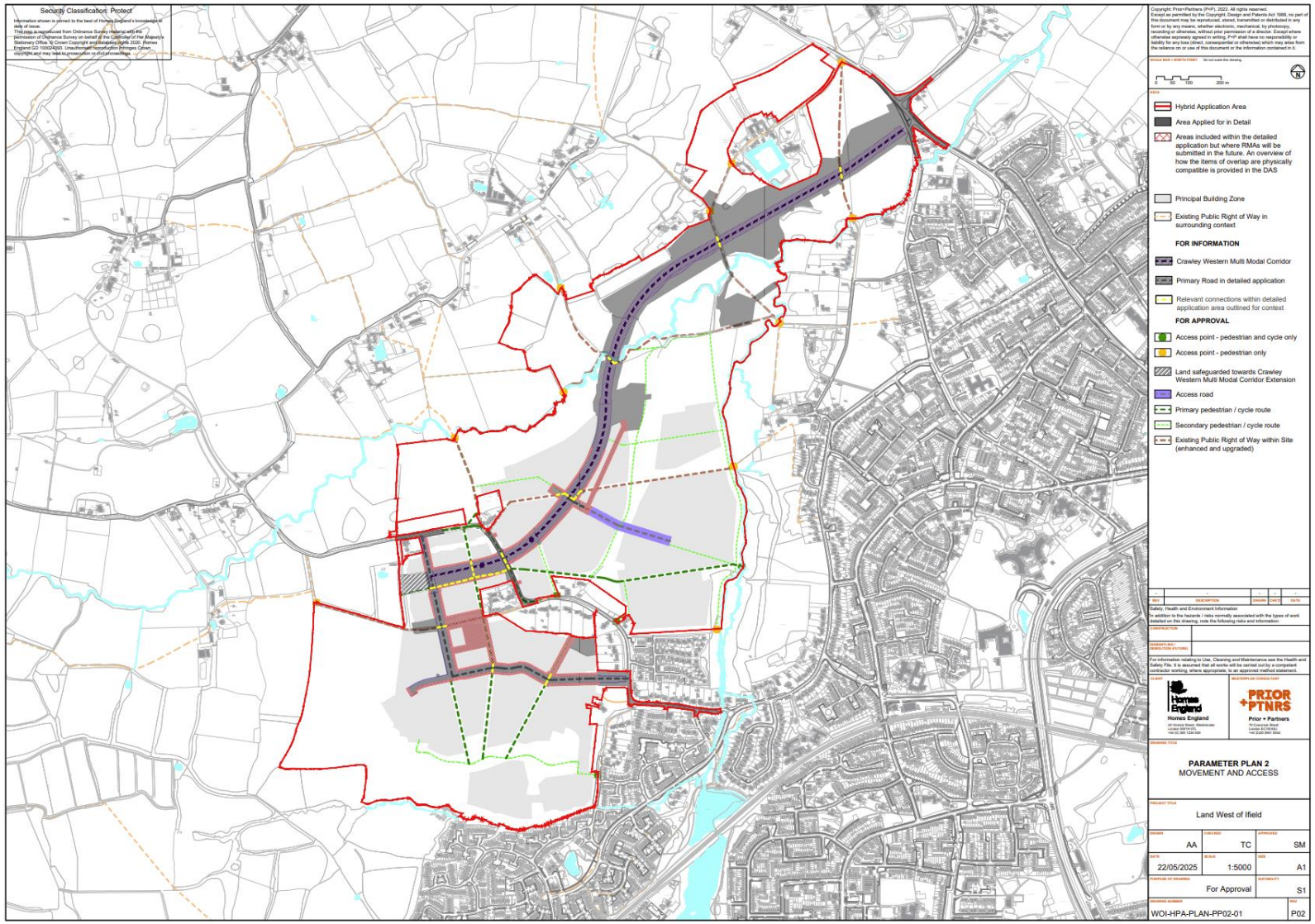


Figure 4.5: Movement and Access Parameter Plan (Parameter Plan 2: Movement and Access, WOI-HPA-PLAN-PP02-01

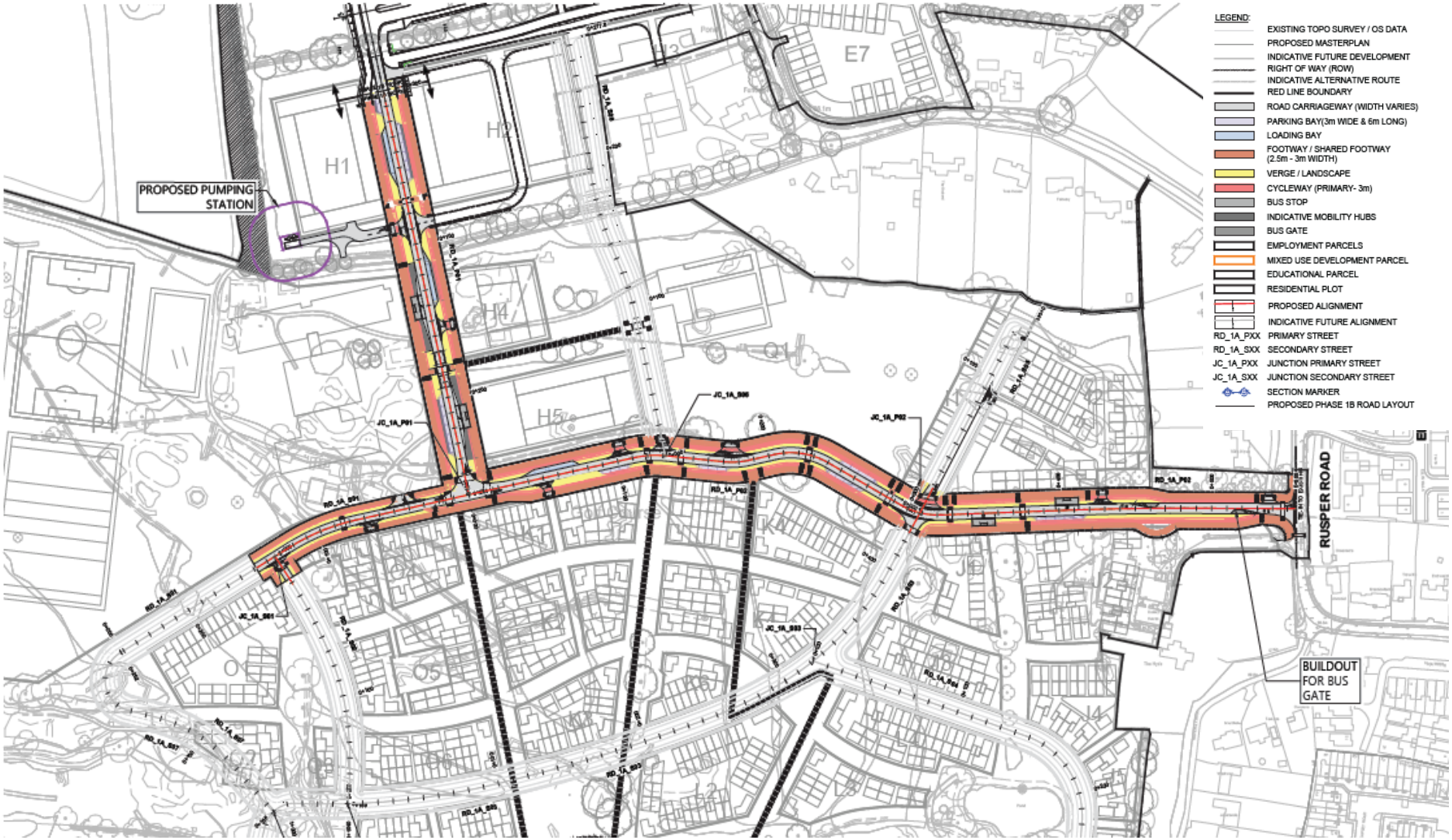


Figure 4.6: Phase 1 Highway General Arrangement of the Primary Road, taken from Phase 1 DAS.

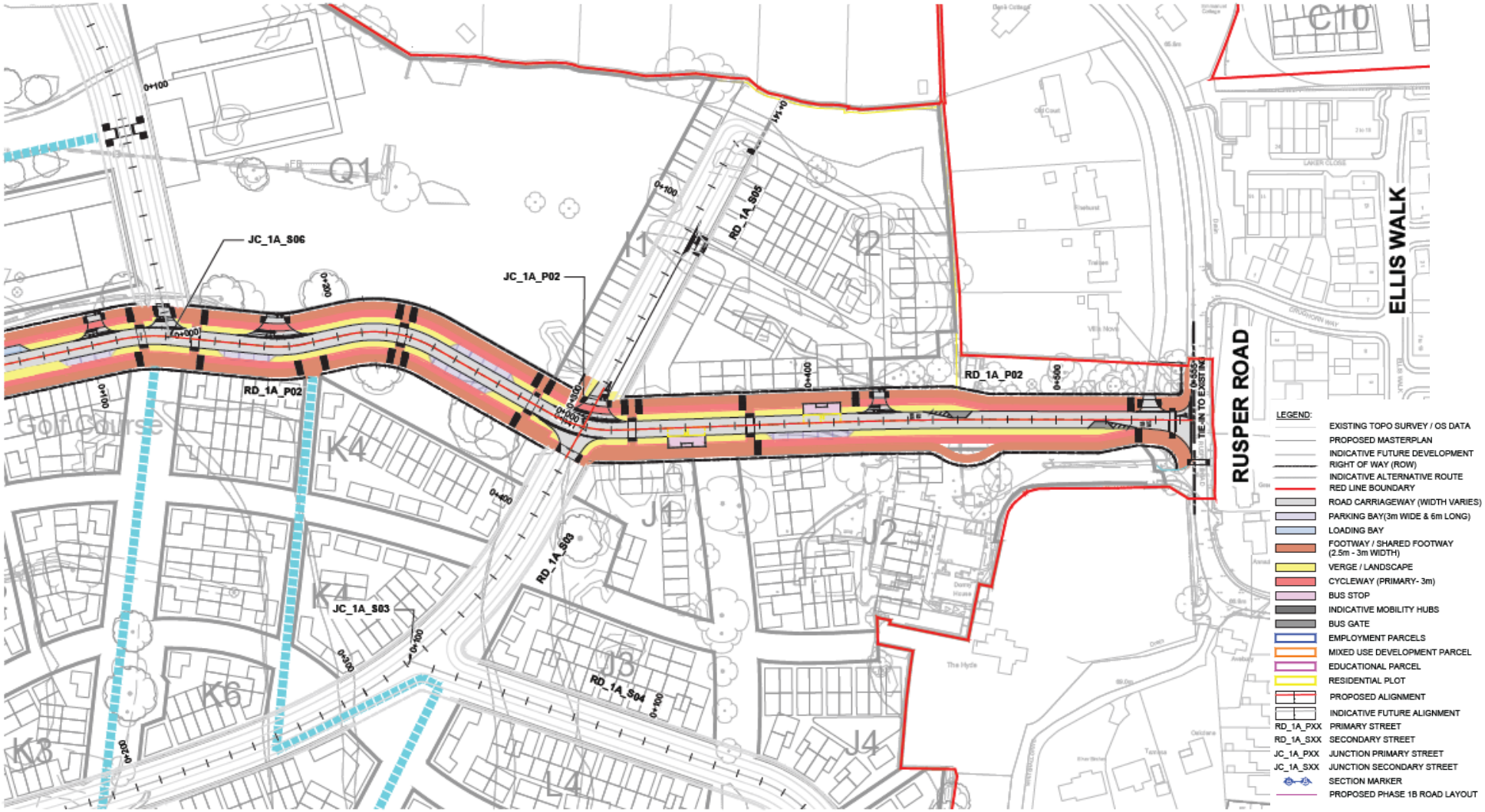


Figure 4.7: Rusper Road Bus Gate, taken from Phase 1 DAS

Pedestrian and Cycle Access

4.10.8 As part of the Proposed Development, a comprehensive, permeable network of walking and cycling routes would be created.

4.10.9 There will be a number of important walking connections within the Proposed Development, including direct connections between residential areas, the neighbourhood centre as well as proposed education and recreational facilities. The provision of a direct network of routes would help to make active travel the most convenient choice for short journeys within the Proposed Development, minimising the number of vehicle trips between on-Site origins and destinations.

4.10.10 The network also provides connections to the edge of the Proposed Development to enable good connectivity with the adjacent communities and more strategic mobility corridors. Routes will be segregated from traffic and provide direct connections within the masterplan, avoiding level changes and road crossings where possible.

4.10.11 The Applicant proposes to separately deliver a sensitively designed east-west pedestrian / cycle connection, appropriate to the local context, across the southern part of the off-Site Ifield Brook Wood and Meadows. The proposed pedestrian / cycle link will be secured pursuant to a specific Section 106 obligation.

4.10.12 Cycling opportunities would also be provided within the internal streetscape of the Proposed Development. The primary vehicle routes would have segregated cycle lanes on both sides of the street, with priority for cyclists across adjoining junctions and accesses. Secondary and residential streets would be low traffic environments and would provide for cycling within the carriageway. The Site has been designed to LTN1/20 guidelines to encourage all types of cyclists.

4.10.13 As the masterplan is developed further, pedestrian, cycle and active travel priority measures and schemes would be considered for inclusion.

4.10.14 Further details of pedestrian and cycle access routes of the Proposed Development can be found in the Framework Travel Plan (TP) (WOI-HPA-DOC-FTP-01).

Public Transport Access

4.10.15 The Proposed Development has been designed to encourage the use of public transport, reducing reliance on private vehicles and promoting sustainability. Key initiatives include the introduction of new ‘Fastway’ bus routes and strategically located bus stops to ensure accessibility throughout the Proposed Development.

4.10.16 Two new Fastway bus routes would be established to serve the Proposed Development, with an emphasis on integrating these routes effectively with existing services. Metrobus or another provider would review these routes in the context of the surrounding area's needs once the build program is finalised.

4.10.17 Three mobility hubs featuring high-quality bus stops would also be developed. These hubs would be positioned strategically to ensure most areas within the Proposed Development are within 400 metres of a bus stop. This proximity is intended to improve bus journey times and enhance convenience for users, while minimising unnecessary stops. The three mobility hubs would be secured via a commitment in the Section 106 Agreement.

4.10.18 Ifield station, approx. 1.2km from the Site, currently has a regular service at all times of day. During off-peak periods, two trains per hour typically serve Ifield in each direction. The majority of the Site is located within a walking catchment of 1.6 km which would take approximately 20 minutes. Ifield station presents a good opportunity for future residents at West of Ifield to travel by rail.

4.10.19 As secured in the S106 draft Heads of Terms (WOI-HPA-DOC-HOT-01), a specified Financial Contribution is to be paid to Horsham District Council (HDC) to support improvements at Ifield station to enhance the station experience, including the potential for additional cycle parking, lighting, enhanced station entrance and enhanced waiting areas.

4.10.20 Further details of public transport routes of the Proposed Development can be found in the Framework Travel Plan (TP) (WOI-HPA-DOC-FTP-01).

Car Parking

4.10.21 Parking requirements for the Proposed Development would be designed to align with the West Sussex County Council (WSCC) standards, to ensure that sufficient parking is provided to meet the needs of the development.

4.10.22 Based on an indicative mix of up to 3,000 homes, the Proposed Development would look to provide residential parking provision in the range of 3,500 – 4,500 total parking spaces. The specific parking provision to be developed for each phase would be sought in each individual reserved matters stage, and would be dependent on built date, as well as technological or other travel advances.

4.10.23 Parking would also be provided for non-residential uses, and accessible to non- residents given its proximity to local neighbourhoods, all of which would be easily accessible by walking and cycling routes and high-quality public transport.

4.10.24 As with residential parking, further detailed plot testing to ascertain the appropriate level of non-residential car parking at specific locations will be carried out with reference to the development's specific land use, associated trip rates, mode shares and forecast job projections at reserved matters stage, on a plot by plot basis.

Cycle Parking

4.10.25 Cycle parking will be provided at a level above WSCC's minimum residential standards to encourage cycling as a primary choice of travel. A target of at least one cycle parking space per bedroom is proposed across the masterplan which would include secure charging facilities for electric bikes for every dwelling. It is anticipated that the cycle parking levels (in line with minimum WSCC's standards) will be secured via condition.

4.10.26 Cycle parking would be provided in the public realm, in the neighbourhood centre where retail, employment and leisure amenities would be located, as well as at transport and mobility hubs. Cycle parking in the public realm would be accessible for different types of cycles and users and would complement or enhance the surrounding public realm. Spaces would be available for recumbent bikes as well as cargo bikes to ensure that all types of bikes can be used within the development.

4.10.27 Opportunities to safeguard for E-bike and shared cycle/scooter schemes have also been considered within the design of the masterplan. This includes consideration of the space and infrastructure requirements at mobility hubs, including charging requirements.

Car Clubs

4.10.28 Car clubs are an effective way to support lower car ownership and also provide a way for people to access cars who may not be able to afford car ownership. With a pay per use membership they reduce the amount of car travel a member does and encourage primary use of walking, cycling and public transport travel.

4.10.29 It is expected that up to 20 car club spaces will be provided within the development, on a phased basis. The Applicant will work with the operators to ensure that the provision suits demand whilst also proactively reducing car ownership. A financial commitment towards car

club spaces will be set out in the draft Heads of Terms, along with the requirement that the Applicant is to ensure the phased delivery of a minimum of 20 car club spaces.

4.11 Deliveries and Servicing

Deliveries and Servicing Management

4.11.1 The majority of deliveries would be taken to the Site using vehicles, namely delivery vans in the form of food deliveries and parcel deliveries.

4.11.2 The internal road network would provide access to delivery vehicle dwellings.

4.11.3 Streets and lanes would be designed to avoid the need for refuse vehicles reversing over long distances. For example, lanes / private drives may include turning head facilities which would allow a refuse vehicle to turn.

Waste Management

4.11.4 An Outline Operational Waste Management Strategy (OWMS)[8] accompanies the planning application. This Outline OWMS sets out how the proposed waste generated during the completed development stage (i.e. operation) of the Proposed Development would be appropriately managed.

4.11.5 Estimated recycling and general waste volumes for residential and non-residential waste have been calculated based on Westminster City Council's (WCC) waste guidance, and have been estimated in regard to the requirements for waste set out in HDC policy and the British Standard guidelines for waste management in buildings, where appropriate.

4.11.6 It is considered that with the implementation of the Outline OWMS, and subsequent revisions, that the Proposed Development would include suitable space for the storage and management of waste necessary for a successful and efficient waste management regime. As each phase of the Proposed Development is brought forward, a Detailed OWMS will be required to be developed.

4.11.7 Future, waste management strategies would be prepared based on the relevant guidance documents and consistent with the strategies adopted for the detailed component, during the reserved matters stage.

4.12 Plant and Ventilation

Heating/ Cooling

4.12.1 An Energy Statement (WOI-HPA-DOC-ENE-01) has been prepared for the Proposed Development. This will be submitted as a supporting technical assessment with the planning application. The Energy Statement has examined three scenarios following an overview of potential low carbon, energy resources and technology options:

- Scenario 1: Direct electric heating and on-Site solar photovoltaic (PV) to deliver 10% of buildings' electricity demand.
- Scenario 2: Individual air source heat pumps (ASHPs) on property level, with on-Site solar PV to deliver 10% of buildings' energy demand.
- Scenario 3: Individual ASHPs on building level with communal heating for flats, with on-Site solar PV to deliver 10% of building's electricity demand.

4.12.2 The energy strategy will be further refined as the design develops, and would further consider factors such as capital and operational cost, legalised cost of energy and net zero aspirations. On the basis that the Proposed Development will be delivered over a number of years, with

[8] Operational Waste Management Strategy. Ramboll, March 2025. Document Ref: 1620007949_WoI_Waste_Outline OWMS Rev 3.0

initial occupation of the secondary school anticipated in 2028 and the occupation of first homes in 2029, no preferred solution has been chosen at this stage. However, the Applicant commits to the minimum Future Homes Standards to ensure homes are "zero carbon ready", above the standards set out in the current Building Regulations.

Ventilation

4.12.3 The Proposed Development would look to achieve high indoor air quality and energy efficiency through appropriate ventilation technologies. The choice of ventilation would be further assessed and confirmed at reserved matters stage based on occupancy, building layout, and local environmental conditions to ensure optimal performance, however it is likely that the following would be considered.

- Modern building standards typically integrate mechanical ventilation systems, such as Heat Recovery Ventilation (HRV) units, which improve air quality by exchanging stale indoor air with fresh outdoor air while retaining heat. This reduces heating and cooling loads and enhances overall energy efficiency.
- The use of smart controls can optimise ventilation based on indoor air quality metrics, ensuring that ventilation systems operate efficiently by responding to real-time demand rather than constant operation. These systems can be particularly beneficial in densely populated residential developments, ensuring continuous comfort and health for occupants.

4.13 Utilities

Electricity

4.13.1 In the UK, power networks and associated infrastructure and equipment are owned and maintained by a licensed Distribution Network Operator (DNO).

4.13.2 Preliminary loads for the completed development stage (i.e. operation) of the Proposed Development has been calculated in the Utilities Statement (WOI-HPA-DOC-UTI-01), which will be submitted as a supporting technical assessment to the planning application. The load calculation is based on currently available information. It should be noted that the outcome of such assessment might be subject to change once the architectural design and the energy strategy for the Proposed Development are further developed.

4.13.3 The Applicant has had regular liaison with UK Power Networks (UKPN) regarding the anticipated needs of the Proposed Development, with existing discussions on a phased approach without the need for a primary sub-station. Further liaison will continue between the Applicant and UKPN.

Gas

4.13.4 The Proposed Development would not be supplied with gas.

Potable Water

4.13.5 There is little existing water supply infrastructure on the Site due to its greenfield nature. There is existing supply associated with buildings existing on-Site, including Ifield Golf Club. Existing properties in Ifield are supplied with potable water from the mains supply provided by Southern Water which in the context of the Site runs within Rusper Road.

4.13.6 Domestic and commercial water demand has been calculated by WSP for the completed development (i.e. operation) of the Proposed Development. The domestic water demand has been calculated for an indicative total population of 6,725 (based the provision of up to 3,000 homes), with each resident using an estimated 85 litres per day.

4.13.7 Commercial water demand has been calculated based on the resultant employment number created for the Neighbourhood Centre and River Valley Employment Zone, in addition to the estimated number of pupils and staff for the two proposed schools on Site. To ensure a worst case has been used, Option 2 of the River Valley Employment Zone has been used which includes the upper range. It has also been assumed that the non-residential buildings will be designed to achieve three BREEAM Wat01 credits, targeting a 40% reduction in water use, as noted in the Water Neutrality Strategy (WOI-HPA-DOC-WNS-01).

4.13.8 The domestic water demand of the completed development stage of the Proposed Development has been calculated to total 572 m3/day of water a day, or 208,780 m3/year once fully operation (i.e. all residential units have been built out). The resultant estimated total water demand for non-domestic properties has been calculated to be 23.8 m3/day – 8,694 m3/year. This equates to a total estimates water demand (across both domestic and non-domestic properties) to be 595.82 m3/day – 217,472 m3/year.

4.13.9 A capacity check application for the Proposed Development was made to Southern Water, the results of which state that there is enough capacity in the existing network to supply the Proposed Development with clean water via a connection to the existing cast iron water main within Rusper Road at the location of Ifield Golf Course, pending network reinforcements being undertaken. To provide the required capacity, the diameter of the existing mains within Rusper Road and Whitehall Drive would need to be increased to 280mm.

4.13.10 The Site is within the area served by the Hardam Water Supply Works and is situated within the Water Neutrality Zone. Therefore, the development will need to comply with the obligations set out by Natural England and HDC. A feasibility study, followed by the development of test boreholes and pump testing looked to confirm the yield and quality of water that may be abstracted from the Upper Tunbridge Wells Sand Formation. As reported in the Water Neutrality Statement (WOI-HPA-DOC-WNS-01), results of the pumping test indicate a yield of 125 cubic metres per day per borehole.

4.13.11 A Water Neutrality Strategy has been developed (WOI-HPA-DOC-WNS-01) and will be submitted as part of the hybrid planning application. The strategy is based on a combination of demand reduction, water reuse, and offsetting measures.

Foul Water

4.13.12 The foul water discharge rate has been calculated in the Utilities Statement (WOI-HPA-DOC-UTI-01) as an average flow of 31.5 l/s with a peak flow of 189 l/s.

4.13.13 In relation to foul drainage, there is an existing Thames Water foul / combined 675mm diameter trunk sewer running northwards adjacent to Ifield Brook east of the Site. To service the Site, it is proposed to make a number of connections to this existing sewer, some via new pumping stations on the Site and some through gravity. This approach will be developed further as the different phases of the Site come forward. Through the pre-planning enquiry process, Thames Water have advised that there may be insufficient spare capacity in the existing sewer network for the proposed flows depending on when houses are delivered over the life of the development. Thames Water are continuing to carry out modelling assessments to consider potential options for upgrade works across the wider sewer network.

Surface Water

4.13.14 A Drainage Strategy has been developed for the Proposed Development (Ramboll, April 2025, 1620007949-RAM-ZZ-XX-RP-D-0001). This will be submitted with the planning application. This drainage strategy has considered the existing Site conditions and demonstrates how the Proposed Development would perform within the existing setting.

4.13.15 SuDS such as detention ponds, swales, filter trenches and below ground tanks have been considered viable for the Proposed Development and have been integrated within the development proposals.

4.13.16 The proposed drainage system is capable of managing runoff from all rainfall events up to and including the critical duration of a 1 in 100-year storm event plus 40% allowable for climate change. Surface water discharged from the Site will be treated to an acceptable standard as informed by CIRIA Guidance Document C753.

4.13.17 The main on plot drainage would utilise SuDS whilst individual plots within the masterplan (residential, commercial and schools) would be allocated a specific role in managing their catchment attenuation.

4.13.18 Surface water collected from vehicular and delivery areas would be treated with a petrol interceptor as appropriate and in accordance with best practice to provide treatment for contaminants to a quality suitable for discharging to a surface water course.

4.13.19 Drainage strategies are subject to final Site wide levels strategy to determine the viability of discharging via gravity which is currently assumed to be achievable for the majority of the Site.

Telecommunications

4.13.20 Where necessary, the Proposed Development would provide new, upgrade or extend the existing telecoms infrastructure in the area to provide full fibre into each property from Openreach, Virgin Media and City Fibre. Future connections to each dwelling/unit would comply with local policy. Applications would be made once the design is further developed at the reserved matters stage.

4.14 Emissions and Residues

Resource Use

Energy

4.14.1 An outline Energy Strategy has been prepared for the Proposed Development taking into consideration the Energy Hierarchy approach ('Be Lean', 'Be Clean', and 'Be Green'). The strategy aims to reduce the energy consumption of the Proposed Development by prioritising the implementation of passive design and energy efficiency measures (‘Be Lean’), followed by the consideration of district heat networks (‘Be Clean’) and the implementation of low and zero carbon technologies (‘Be Green’).

Potable Water

4.14.2 As described in the Water Neutrality Statement (WOI-HPA-DOC-WNS-01),there is an opportunity to harvest rainwater as an alternative source to potable water supply. Rainwater harvesting (RWH) can be delivered at the property-level, with water collected from the roof and stored on each property, or through a semi or fully centralised system with large storage tanks, treatment plants and a reticulation system for distribution. A semi-centralised system is considered appropriate for the Proposed Development. Site wide, when considering residential units only, the normalised rainwater yield equates to 325 cubic metres per day. This source of water supply is considered to be sufficient to meet non-potable water demand.

4.14.3 In addition, SuDS would be designed with the multifunctional benefit of green infrastructure in mind and the green infrastructure would be selected to reflect the sustainable water resources available and maximise opportunities for rainwater harvesting and grey water usage, where possible, thereby reducing net requirements for potable water.

Materials

4.14.4 The Proposed Development has been designed to be in line with the waste hierarchy by designing out waste, creating flexible spaces and selecting materials for easy maintenance and end-of-life reuse and recycling.

4.14.5 The Proposed Development would seek to achieve the following targets:

- At least 70% by weight of construction and demolition waste is subjected to material recovery;
- Divert approximately 70-90 % of the total demolition and construction waste arisings from landfill.

Emissions

To Sewers and Water

4.14.6 A Flood Risk Assessment (WOI-HPA-DOC-FRA-01) has been undertaken for the Proposed Development which includes an assessment of surface water runoff. The results of the FRA have been used to inform and ensure measures for reduced surface water runoff have been integrated into the design of the Proposed Development.

4.14.7 The Site would discharge at equivalent greenfield rates into existing surface water, with allowances made for future increases in rainfall due to climate change. This would ensure the watercourses would receive water at the restricted Qbar rate. These watercourses are the River Mole, Ifield Brook and Hyde Hill Brook. The rates of discharge would be limited to existing greenfield rates for all rainfall events up to and including the climate change-corrected 100 year storm.

4.14.8 Discharge rates would be managed by SuDS features, predominantly comprising swales and detention basins with a drain down time less than 24 hours to comply with Gatwick Airport's requirements to mitigate the risk of bird strike.

4.14.9 It is intended for foul water to discharge to the existing Thames Water public sewer which bounds the site to the east. Some of the site foul water is anticipated to be too far away from the public sewer and a pumping station is proposed to aid with areas which cannot make suitable connection via gravity.

To Air

4.14.10 Operational air emissions would primarily arise from road traffic. These are summarised in ES Volume 1 Chapter 7: Air Quality.

To Land

4.14.11 No routine emissions to land are anticipated within the completed development stage of the Proposed Development.

Residues

Waste

4.14.12 Waste generated by occupants of the proposed dwellings and the community building would be managed by extending existing waste collection services into the Proposed Development.

4.14.13 Appropriate and sufficient dedicated storage space for refuse and recyclable waste generated by the residents and users of the Proposed Development would be provided for each proposed building as discussed in the Outline OWMS. This would enable appropriate management of waste disposal during the Proposed Development's operation. Details of appropriate waste storage and collection space would be provided at the reserved matters stage.

4.14.14 It is not anticipated that waste generated at the Site would require specialist treatment.

4.15 Proposed Development Sustainability

4.15.1 The Proposed Development has embedded sustainable design principles. These principles include ensuring efficient resource use (i.e. energy, water and materials), reducing overall greenhouse gas emissions, and improving wellbeing of future and existing (neighbouring) occupants and users.

4.15.2 A clear hierarchy of mobility corridors for active travel have been established within the emerging masterplan following the principles set out in the Framework TP (The Proposed Development has been designed to encourage the use of public transport, reducing reliance on private vehicles and promoting sustainability. Key initiatives include the introduction of new 'Fastway' bus routes and strategically located bus stops to ensure accessibility throughout the Proposed Development.

4.15.3 Car clubs are an effective way to support lower car ownership and also provide a way for people to access cars who may not be able to afford car ownership. With a pay per use membership they reduce the amount of car travel a member does and encourage primary use of walking, cycling and public transport travel.

4.15.4 It is expected that up to 20 car club spaces will be provided within the Proposed Development, on a phased basis. The Applicant will work with the operators to ensure that the provision suits demand whilst also proactively reducing car ownership.

Sustainability Strategy

4.15.5 As part of the Proposed Development, the Applicant has developed a Sustainability Strategy (WOI-HPA-DOC-SUS-01) to ensure the Site deliver the homes, jobs and infrastructure needed in Horsham and Crawley, and demonstrate the value of working with major partners to achieve change beyond the Site boundary. The Strategy is designed to guide short and long-term decision-making within the masterplan for the existing stage, and for the subsequent reserved matters applications.

4.16 Proposed Development Operational Provisions and Controls

Operational Management Plans

4.16.1 As discussed in the Planning Statement (WOI-HPA-DOC-PS-01), the Applicant has developed an initial vision that will underpin the long-term stewardship arrangements for the Proposed Development. The vision proposes a holistic approach, focusing on both the need to manage and maintain a range of community assets that will be delivered on-Site, alongside a community development role. The purpose of the latter is to create a positive and inclusive place for both new and existing residents. The vision also highlights the aspiration for the long-term stewardship arrangements to be financially viable, and is essential to enable the long-term stewardship activities to be implemented successfully and in perpetuity.

4.16.2 Suitable arrangements will clearly vary from place to place and will depend on the final function of the stewardship body, the assets that they want to and are able to manage, and the types of finance and legal arrangements needed to ensure their provision.

Delivery and Servicing Management Plans

4.16.3 A Delivery and Servicing Management Plan (DSMP) would be developed at the reserved matters stage, and would be on a phased basis. The objective of the DSMP would be to manage deliveries and servicing to the Site in order to ensure efficient and successful operations (including refuse storage and collection). Effective management would ensure that the potential for vehicle conflicts is avoided and that the Proposed Development would have the minimum impact on both the surrounding highway network and pedestrian network.

4.16.4 The DSMP would include details such as where deliveries and servicing would be undertaken from, who would be responsible for ensuring operations run effectively, what size vehicles are anticipated to require access and what frequency of vehicle movements are expected. The DSMP would be secured by an appropriately worded planning condition.

Travel Plan

4.16.5 As part of the Proposed Development, the Applicant has developed an Framework TP to encourage the use of non-car modes of travel and ensure the sustainability of the Proposed Development.

4.16.6 The Framework TP provides a package of measures to encourage residents to use alternatives to single-occupancy car-use. The short-, medium- and long-term measures outlined in the Framework TP have been designed to influence modal shift to the most sustainable forms of transport, namely walking and cycling.

4.16.7 The final Travel Plan would be secured by means of an appropriately worded planning condition.

Emergency and Disaster Management

4.16.8 The following summarises the emergencies that could arise at the Proposed Development and the design measures that have been incorporated to respond to these incidents:

- Fire: All internal streets, public spaces and pedestrian lanes within the Proposed Development would be accessible by emergency vehicles and all buildings within the outline component will be designed at the reserved matters application stage to be compliant with relevant Fire Safety Law and Guidance.
- Flood: The Proposed Development is not at significant risk of flooding from fluvial and surface water flooding and would remain operational in times of fluvial flood during the 1 in 100-year, 1 in 100-year plus climate change and 1 in 1,000 year annual probability events. Surface water flood risks are addressed through the development of SuDS. Therefore access for emergency vehicles to the Site would not be likely to be effected by flooding.
- Vehicle Crashes: Where applicable, the landscape design has incorporated features such as dense planting of trees, large boulders, fixed street furniture, level difference and landscape forms, as well as movable and fixed bollards that could stop vehicles from driving into the main pedestrian areas.

5 DEMOLITION AND CONSTRUCTION DESCRIPTION

5.1 Introduction

5.1.1 Impacts arising during demolition and construction processes are temporary, generally short-term and intermittent. Nevertheless, they can be sources of potentially significant effects on environmental resources and residential amenity.

5.1.2 In accordance with the EIA Regulations, this chapter sets out the works associated with the Proposed Development and the key activities that would be undertaken during the demolition and construction stage. The chapter also describes the potential environmental impacts associated with the demolition and construction stage and management controls that form part of the Proposed Development that would be implemented to avoid, minimise and where not possible, mitigate the magnitude of potential environmental impacts.

5.1.3 Due to the hybrid nature of the planning application, it is not possible to predict in detail all of the specific environmental impacts and effects that may arise from the proposed works as detailed demolition and construction method statements and specifications have not yet been prepared by the lead construction contractor(s) (hereafter referred to as the 'Principal Contractor') for the outline elements.

5.1.4 However, for the outline element and therefore for the entire Site, it is possible to identify the potential environmental impacts and likely effects associated with the proposed works based on professional judgement and experience of schemes of similar scale and nature. It is also possible to establish a framework for the management of these impacts to ensure that significant environmental effects are avoided, minimised and, where not possible, mitigated.

5.1.5 The demolition and construction management framework which has been developed for the Proposed Development as part of the iterative design process is set out within this chapter, as well as within the Outline Site Waste Management Plan (the "OSWMP")[1] and Outline Construction Environmental Management Plan (the "OCEMP") (ES Volume 2 Technical Appendix 5.1) that accompany the Planning Application. For the outline components, these reports would form the basis for a Detailed CEMP to be implemented during the demolition and construction works when future plots are built out under Reserved Matters Applications (RMA).

5.1.6 An Outline CEMP has also been prepared by Arcadis specifically for the detailed element (Phase 1) of the Proposed Development (the "Phase 1 OCEMP")[2]. Works included under the Phase 1 (detailed) component are described within ES Volume 1 Chapter 4: Proposed Development Description. The Phase 1 OCEMP also accompanies the Planning Application as a standalone report.

5.1.7 As for the outline elements, a Detailed CEMP for Phase 1 works of the Proposed Development would be secured by means of an appropriately worded planning condition and would be

[1] Outline Site Waste Management Plan for the Proposed Development at West of Ifield, prepared by Ramboll, dated 11/03/2025, version 3.0

[2] West of Ifield Phase 1 Infrastructure Outline Construction Environmental Management Plan (10051123-ARC-XXX-ZZ-TR-CM-00001), prepared by Arcadis, dated March 2024, version P01

prepared by the Principal Contractor in advance of the demolition and construction works and following the appointment of sub-contractors (or equivalent). The Detailed CEMP for Phase 1 would be based upon and comply with requirements in the Phase 1 OCEMP[2]. Similarly, a Detailed CEMP would be prepared for each phase of the outline elements of the Proposed Development based upon the OCEMP (ES Volume 2 Technical Appendix 5.1) and this would be updated as required during the course of the development works, concurrent with the reserved matters applications and delivery of respective phases.

5.1.8 Additionally, the Detailed CEMP would be prepared in accordance with standard best practice and regulatory requirements and should include a Detailed SWMP that will be based upon the existing OSWMP[1] that has been prepared for the hybrid planning application.

5.1.9 More specifically, the Detailed CEMP would define relevant policies, legislative requirements, thresholds/limits, procedures, and roles and responsibilities for the implementation of environmental and management controls throughout the duration of the works. The Detailed CEMP would be discussed and agreed with HDC in advance of works commencing on-Site.

5.1.10 An outline of all the anticipated environmental issues and necessary management controls that would be covered within the Detailed CEMP is provided within this Chapter and the OCEMP (ES Volume 2 Technical Appendix 5.1).

5.1.11 It is standard practice to allow the appointed sub- contractors (or equivalent) to provide substantial input into documents such as the Detailed CEMP and Detailed SWMP. However, as noted above, sub-contractors are not typically appointed until post planning stages, and detailed method statements have therefore not yet been prepared. Nevertheless, the likely content of such documents can be reasonably predicted based on professional judgement and experience of schemes of similar scale and nature. As such it is considered that the identification and assessment of likely environmental effects is still achievable in the EIA.

5.1.12 It is important to note that this chapter does not assess the magnitude of potential impacts, nor the significance of likely effects during the demolition and construction stage, as this is dealt with in individual technical assessments within ES Volume 1 (Chapters 6 - 15). Controls set out in this chapter and the OCEMP (ES Volume 2 Technical Appendix 5.1) are considered as embedded mitigation within each of the technical assessments as the controls:

- are standard industry measures applied at construction sites;
- are tried and tested measures and therefore benefit from a high degree of certainty in respect of effectiveness to avoid and/or mitigate potential effects; and
- have been committed to by the Applicant and will form part of the Proposed Development's Detailed CEMP, which would be secured by means of an appropriately worded planning condition.

5.2 Development Programme

5.2.1 A detailed development programme has not yet been finalised. However, to enable assessment of potential environmental impacts and their likely effects within the EIA, an indicative, but feasible, phased programme has been developed by the Applicant based on a number of assumptions. These assumptions have been informed by an understanding of current and future projected market conditions, logistical arrangements, technical considerations and professional experience, all of which are considered to be reliable.

5.2.2 It is anticipated that the indicative Proposed Development demolition and construction programme would be delivered in five phases each with associated enabling, infrastructure, demolition and construction works.

5.2.3 Figure 5.1 and Figure 5-2 depict the indicative phasing strategy for the Proposed Development.

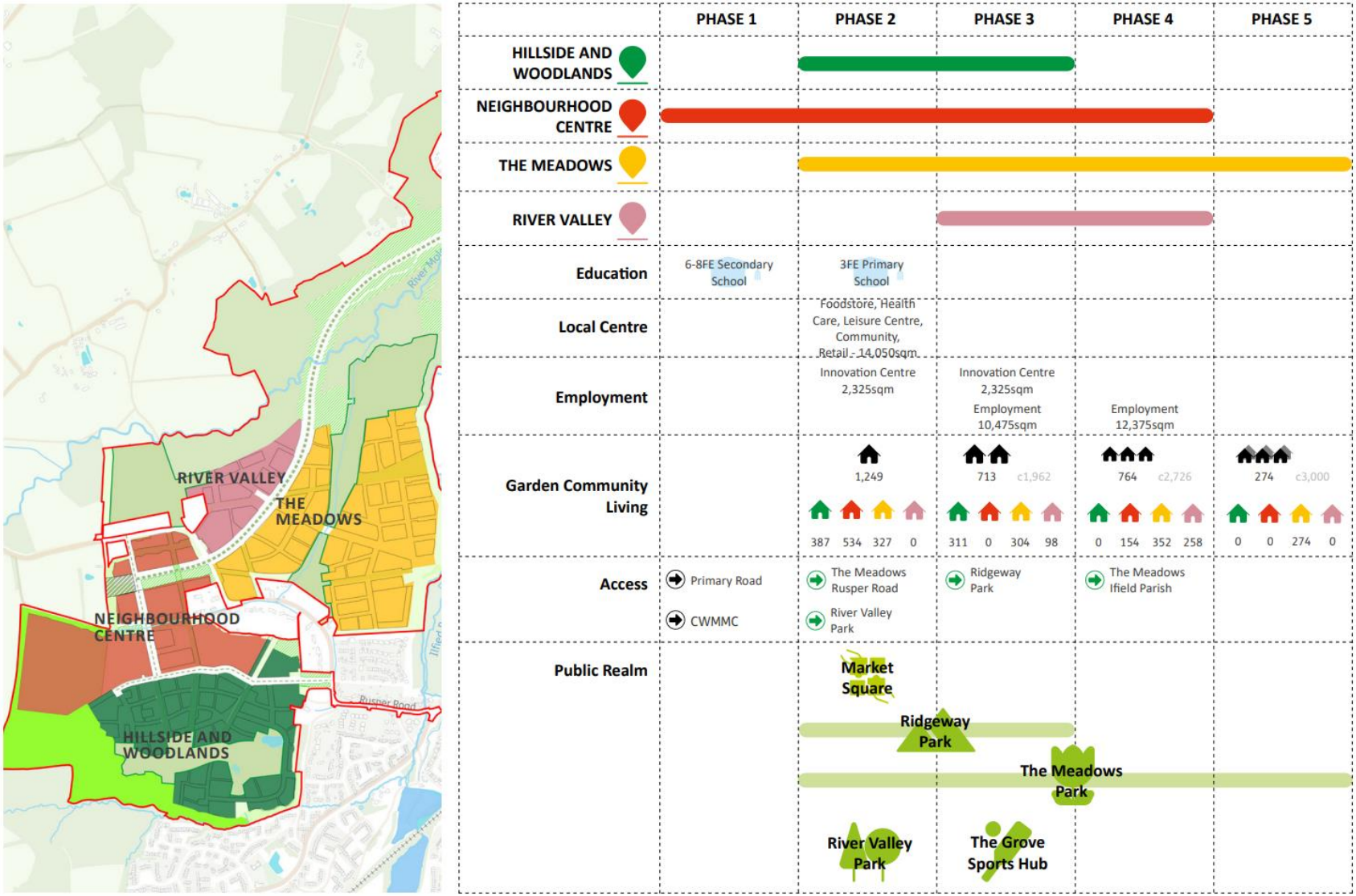


Figure 5.1: Overall Indicative Strategic Phasing (Design and Access Statement (WOI-HPA-DOC-DAS-01)).

5.2.4 The indicative development programme is summarised in Table 5.1. This assumes that planning permission is secured in 2025, with work commencing on-Site in 2027. For the purpose of this EIA, the development works are anticipated to be undertaken over a 15-year period, with completion targeted for 2041.

5.2.5 Initial occupation of the secondary school is anticipated in 2028, and the homes in 2029 and continuing until 2041.

5.2.6 In determining the indicative phasing strategy, the following key principles are embedded:

- Initial site preparation and infrastructure required to unlock the early stages of development will be delivered under Phase 1.
- Residential and employment phases are subject to market demand and can come forward independently of each other.
- Supporting the earlier delivery of the Neighbourhood Centre will establish the new community with local amenities available in advance of the majority of residents moving in.
- When established and agreed through the phasing strategy, some degree of overlap between main phases is acceptable, subject to ensuring that any key infrastructure items upon which the subsequent phase depends, are sufficiently progressed.
- Given the relatively long build-out of the development, it is essential that the approach is flexible and can adapt to changes over the lifetime of the plan. This phasing strategy should be seen as an informed guide and not rigid prescription.
- Phasing should be flexible enough to accommodate public sector investment / external funding that could support infrastructure provision at West of Ifield, particularly in the early phases of development or to respond to strategic or locally identified priorities.

5.2.7 Overall, the Applicant is seeking to diversify the housing market through the delivery of a variety of housing tenures. This would support multiple development partners and phases being constructed in parallel, to increase the efficiency of the delivery of the Proposed Development.

5.2.8 The Principal Contractor would provide a detailed programme of works when available for each phase submitted for RMA.

5.3 Interface with Key Stakeholders

5.3.1 Prior to the commencement of demolition and construction works, the Detailed CEMP would be produced and updated by the Principal Contractor (and various sub-contractors) to reflect contractor-specific management arrangements and approaches, including those raised in correspondence with the key stakeholders identified below, as well as more detailed information in respect of for example, method statements.

5.3.2 Key stakeholder to be consulted by the Principal Contractor in producing and updating the Detailed CEMP would include:

- Horsham District Council (including Environmental Health Officer);
- Local Authority Highways;
- Local Lead Flood Authority;
- Utility Providers;
- Southern Water;
- Natural England;
- Thames Water; and
- Environment Agency.

5.4 Enabling and Demolition Works

Pre-Commencement Surveys, Investigations, Consents and Licences

5.4.1 Concurrent with the reserved matters applications/discharge of planning conditions, a number of surveys and investigations would be undertaken prior to the commencement of works on-Site. In addition, various consents and licences would need to be granted. At this stage, the following pre-commencement surveys, licences and investigations are envisaged:

- Notices and agreements for works on the highway in accordance with the Highway Acts;
- Permanent Road Orders;
- Temporary Traffic Orders and parking bay suspensions, if required;
- Hoarding and scaffold licences;
- Details of pedestrian or cycle route diversions;
- Crane operator permit - required if mobile cranes / cherry pickers are to be used;
- Connections to existing statutory services and main sewers;
- Flood risk activity permit from the Environment Agency (EA);
- Consent from the Lead Local Flood Authority (LLFA) for discharge of surface runoff during demolition and construction to existing surface water ditches within the Site;
- Party wall act notices and agreements;
- Approval of Detailed CEMP, including any specific agreements relating to the control and monitoring of demolition and construction noise, e.g. Section 61 of the Control of Pollution Act 1974[3] for noise;
- European Protected Species Licence and/or a District Level Licence for works in certain areas (see ES Volume 1 Chapter 8: Biodiversity);
- An abstraction licence will be required to be obtained from the EA for all new groundwater abstractions, with any monitoring requirements for the construction stage to be identified in consultation with the EA;
- Demolition Notice;
- Construction Notice; and
- Deployment notices for mobile treatment plants, if required.

5.4.2 At the time of writing, the following pre-commencement surveys and investigations have already been completed:

- Topographical survey undertaken by Arcadis in 2019 (19/013/100-00);
- Minerals resource assessment[4];
- Site investigations and geo-environmental surveys (see Ground Investigation and Geotechnical Design Report[5] and associated Technical Note[6], Phase 1 Ground Conditions Assessment[7], Hydrogeological Risk Assessment[8], and borehole investigations[9]);
- Ecological surveys and records (see ES Volume 2, Technical Appendices 8.1-8.34);

[3] HM Government. Control of Pollution Act 1974, Section 61. Available online at: https://www.legislation.gov.uk/ukpga/1974/40/section/61 [Accessed 07/04/2025]

[4] Minerals Resources Assessment for the Proposed Development at West of Ifield, prepared by Ramboll, dated 25/02/2025, version 4.0 (Document no: Document No.: 162007949-RAM-ZZ-XX-RP-SS-00003-P02).

[5] Document No: 10051123-ARC-010-1A-TR-GE-00001_P01

[6] Document No: 10051123-ARC-010-1B-TN-GE-10001

[7] Phase 1 Environmental Site Assessment (Ground Conditions) for the Proposed Development at West of Ifield, prepared by Ramboll, dated 26/02/2025, version 3 (Document No.: 1620007949-RAM-ZZ-XX-RP-SS-00004-P01).

[8] West of Ifield Development Groundwater Initial Feasibility and Hydrogeological Risk Assessment, prepared by WSP, dated 22/04/2024 (Document Ref.: WSP-WATER-REPORT-INT-0002).

[9] Ref of report TBC, from WSP

- Arboriculture surveys (see Arboriculture Report that accompanies the Hybrid Planning Application[10]);
- Noise surveys to determine existing noise levels at existing noise sensitive receptors (see ES Volume 2, Technical Appendix 12.3: Baseline Noise Survey); and
- Phase 1 Construction Traffic Management Plan (CTMP) [11].

Site Offices and Welfare Facilities

5.4.3 For the infrastructure and enabling phase of the works, a traditional arrangement of temporary site set up is anticipated utilising modular space units. Temporary utility connections would be made to existing utility services for temporary accommodation and for demolition and construction use where no existing connections exist.

5.4.4 Following completion of the enabling works, good quality welfare facilities would be provided on-Site including, toilets, washing and changing facilities, and canteen with a kitchen. This facility would be centrally located and supplemented by satellite facilities and plot specific facilities as the development works progress.

5.4.5 These temporary provisions would be expanded and relocated as required to meet the requirements of the Proposed Development and the anticipated peak construction workforce as dictated by the indicative phasing and construction timeline.

5.4.6 This accommodation would be cleaned and maintained on a daily basis and preventative pest control measures would also be put in place, i.e. appropriate storage and regular waste pick-up.

General Site Access

5.4.7 The primary construction Site access would be from Charlwood Road or Rusper Road during demolition and construction until the construction of the Crawley Western Multi-Modal Corridor (CWMMC) is complete. The construction site access would then be via the CWMMC once constructed.

5.4.8 Vehicle gates with a minimum width of 4.5 m would be positioned and constructed to minimise construction vehicle noise and would open into the Site.

5.4.9 Wheel cleaning facilities would be established at vehicle gates. A pedestrian access point with security would be located close to the main vehicular access gate with a separate pedestrian gate and footpath provided for the workforce.

Site Set Up

5.4.10 Construction compounds, storage and plant would be located outside of flood zone extents and Flood Compensation Areas would be completed prior to construction of any structures.

Hoarding, Gates and Scaffolding

5.4.11 Prior to commencement of the demolition works and Site clearance works, the boundaries to working areas would be secured to segregate the general public from the demolition and construction works using soil, well maintained hoardings and screenings where required.

5.4.12 The exact locations would be identified and agreed with HDC as part of the Detailed CEMP. Licences for hoarding located on the public highway would be obtained from HDC. Hoardings would typically be 2.4 m high unless otherwise specified.

5.4.13 The hoarding would be decorated appropriately with marketing graphics/logos. Regular inspections would be carried out to ensure that the integrity of the hoarding is maintained, and the hoarding would be kept in a good state of repair and free from graffiti.

[10] Arboricultural Report, prepared by Tim Moya Associates, dated March 2025 (Document Ref.: 230265-PD-11k).

[11] Construction Traffic Management Plan for Phase 1 of the Proposed Development at West of Ifield, prepared by Arcadis, dated August 2024

5.4.14 Site direction and safety signage would be installed in and around the area.

5.4.15 There may be a requirement for out of hours security and/or CCTV systems to secure the Site.

5.4.16 The Site-specific strategy would be developed with the Principal Contractor and would be agreed with HDC following guidance where applicable.

5.4.17 Lighting would be provided to the hoarding during hours of darkness to prevent shadow on surrounding footpaths and roads that could compromise safety of the public. Lighting would be implemented in a way that minimises night-time use and light spill.

5.4.18 Scaffolding on the public highway would be licensed following agreement with HDC and in line with the Highways Act 1980. Gantries over the highway would similarly be agreed and licensed in line with the Highways Act 1980.

Utility Diversions / Removals

5.4.19 During the Site enabling works, there would be complete isolation, decommissioning and removal of any services and utilities.

5.4.20 Works are to be co-ordinated to ensure services to the Site and surrounding facilitates are maintained during the works. This may require a phased approach for the removal of items in line with the agreements with the relevant statutory authorities. Utility providers would be contacted at the earliest opportunity to ensure the diversion works are carried out in a timely manner.

5.4.21 Following consultation with the relevant statutory authorities and service providers, the Principal Contractor would determine which diversion works would be carried out by the Principal Contractor/sub-contractors, and which may need to be carried out by the relevant authority.

Site Clearance and Preparation

5.4.22 The following Site preparation works would be undertaken:

- Vegetation clearance;
- Topsoil strip;
- Earthworks;
- Creation of a series of building footprints from which foundation works would be undertaken; and
- Separation of excavated spoil with suitable top soils stored for later use in gardens and landscaped areas, and sub-soils moved on-Site and recontoured into bunds, swales and other landscape features and elements of the sustainable drainage systems (SuDS).

5.4.23 Earthworks are likely to be undertaken by standard excavators and bulldozers, with the use of heavy goods vehicles (HGVs) for the removal of material off-Site where required. The following works are anticipated:

- General remodelling of ground levels following the removal of existing structures, foundations and underground structures (if any);
- Excavation of utility trenches;
- Excavation of SuDS drainage features;
- Excavation for roads; and
- Excavations associated with foundation formation.

5.5 Demolition Works

5.5.1 Structures that are to be demolished are shown on the Demolition Parameter Plan, Figure 5-2, below.

5.5.2 It is understood from T&T that none of the buildings being demolished are in residential use; they are all in agricultural use or associated with the Ifield Golf Club, however, Dormy House adjacent to the Golf Club is not proposed for demolition.

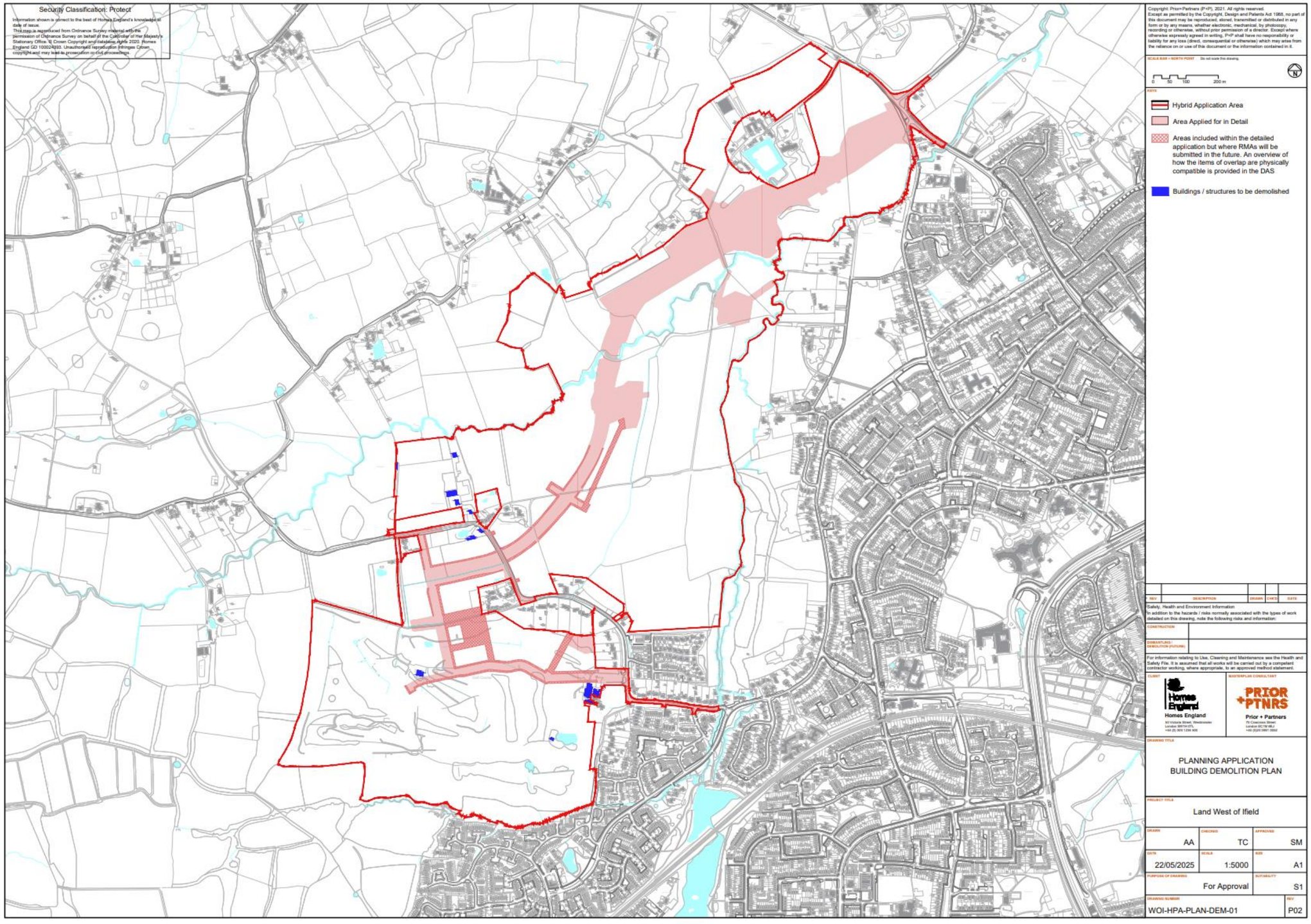


Figure 5-2: Indicative Demolition Parameter Plan (WOI-HPA-PLAN-DEM-01)

5.5.3 Once existing buildings/structures have been vacated, the buildings/structures would be secured using suitable hoarding, protection and signage and initial demolition surveys, both intrusive and non-intrusive, would be carried out to determine the presence and amount of any risk items (i.e. asbestos) and to confirm the existing construction.

5.5.4 Service disconnections, if required, would be carried out to the buildings followed by the removal of any key risk issues identified before 'soft strip' is concluded to the buildings/structures.

5.5.5 It is intended that the following methodology would be adopted to minimise the potential impacts associated with the demolition works, along with any other necessary environmental procedures to ensure the highest level of environmental control is achieved:

- Buildings are likely to be demolished using long reach mechanical plant incorporating breakers and crunchers working from inside the Site boundary;
- Plant used for demolition would be selected to minimise noise and dust production;
- Demolition on any road boundaries or boundaries with existing occupied properties would principally be carried out by hand or remote-controlled breakers from the perimeter scaffolds which would allow for screening and the control of dust;
- Localised water/mist systems would be used at the point of origin during demolition activities and processing areas to supress and reduce the generations and/or migration of airborne dust; and
- Regular inspections would be undertaken to ensure mitigation measures for dust, noise and vibration impacts are appropriate.

5.6 Construction Works

Hoarding, Gates, and Scaffolds

5.6.1 It is envisaged that the Site levelling excavation works would typically commence immediately after the Site clearance, enabling and demolition works and as such the area would already be secured with a full compliant hoarding with licence and requirements in place.

5.6.2 There may be some alteration and adaptions required, as well as follow-on construction works and sequence. Please refer to the Enabling and Demolition Works Sections in this chapter for further details on hoarding, gates and scaffold.

Cranes and Hoists

5.6.3 The use of mobile cranes is anticipated for the construction of the buildings across the phases.

Substructure Works

5.6.4 Sub-structure works would comprise the following:

- Necessary excavations, including boreholes where applicable;
- Formation of concrete foundations; and
- Installation of attenuation tanks.

5.6.5 It is anticipated that strip foundations of approximately 1 m – 2 m depth would be the main form of foundations used across the Site.

5.6.6 For the purpose of the noise assessment (ES Volume 1, Chapter 12), it has been assumed that piling may occur for development in non-residential or mixed-use development plots. Should piling be required, a piling risk assessment would be undertaken to inform the most appropriate piling method to be adopted.

Superstructure Works

5.6.7 The use of Modern Methods of Construction (MMC)[12,13] would be considered in the construction of the Proposed Development, where possible and subject to commercial and technical viability.

5.6.8 Building materials would be selected and agreed with HDC at the RMA stage but is likely to include a common palette of building materials as included in the Site Wide Design Code (WOI-HPA-DOC-SWDS-01).

5.6.9 Typical road construction materials will be used throughout and will be specified in accordance with the Design Manual for Roads and Bridges, and supplementary West Sussex County Council design standards.

5.7 Fit-Out Works

5.7.1 For the Outline elements, it is expected that the internal fit-out and services within the Proposed Development would include all residential fit-out elements, including kitchens and bathroom facilities.

5.7.2 No fit-out works are needed for Phase 1 (the detailed element) of the Proposed Development.

5.8 External/Landscaping Works

5.8.1 Installation of the proposed soft landscaping within a given phase would only commence upon substantial completion of associated construction and fit out works to minimise potential plant material loss. Site-based soils would be used wherever possible to fill and shape lawn and landscaped areas, with subsoil used on the strategic areas of open space. Proposed management of soil resources on-Site has been included in ES Volume 2 Technical Appendix 6.2 (Framework Soil Management Plan). The exact timing and design of landscaping works would be controlled by a planning condition.

5.8.2 Landscape works will be carried out in accordance with the landscape construction drawings, details and specifications, including:

- The Development Specification and Parameter Plan Framework (WOI-HPA-DOC-DSPPF-01), including Parameter Plan 1: Landscape and Public Realm (WO1-HPA-PLAN-PP01-01) and Parameter Plan 6: Planning Application Tree Removal Plan (WOI-HPA-PLAN-LRP-01);
- Design and Access Statement for the Proposed Development (WOI-HPA-DOC-DAS-01);
- Site Wide Design Code for the Proposed Development (WOI-HPA-DOC-SWDS-01);
- Phase 1 Landscape and Ecological Management Plan (LEMP) (10051123-ARC-300-1A-TR-LA-00001);
- Phase 1 OCEMP (10051123-ARC-XXX-ZZ-TR-CM-00001);
- Phase 1A Typologies Plan (10051123-ARC-300-1A-DR-LA-00001); and
- Phase 1B Landscape Typologies Plans (10051123-ARC-300-1B-DR-LA-00001 and 10051123-ARC-300-1B-DR-LA-00002).

5.8.3 Embedded mitigation during the demolition and construction phase to reduce disruption, visual intrusion and assist in landscape integration for the Proposed Development is summarised as follows:

- Construction programme kept to the minimum practicable time to reduce the duration of any landscape and visual impact;

[12] Building Research Establishment, 2009. Modern Methods of Construction. BRE

[13] Waste and Resources Action Programme, 2007. Current Practices and Future Potential in Modern Methods of Construction.

- Construction plant and materials storage areas appropriately sited to minimise their landscape and visual impact;
- Construction managed such that the loss of any existing vegetation not affected by the permanent works is minimised; and
- Profile shapes and habitat created naturalistically to reflect the existing surroundings, with the footprint of the Proposed Development minimised to avoid unnecessary tree removal and ensuring future obligations for maintenance during the operation phase are reduced.

5.8.4 For Phase 1 of the Proposed Development, the LEMP specifies that planting is to take place within the first available planting season following completion of the engineering works and shall meet the requirements of the landscape specification produced as part of the detailed design.

5.8.5 As discussed in ES Volume 1 Chapter 8: Biodiversity, due to the presence of several bat roosts within the Site, a suitable Natural England licence will be required if felling, demolition or significant works resulting in the modification of roosts are required that may damage or destroy roosts at buildings or trees, or works that may disturb roosting bats. In addition, crossing point surveys are recommended where the CWMMC intersects key commuting routes. These should be carried out over the course of the survey season prior to vegetation clearance and construction works commencing. The purpose of these surveys is to provide a baseline and then undertake construction and post-construction monitoring to understand the effectiveness of the mitigation once implemented.

5.8.6 Embedded mitigation measures have been incorporated into design of the Proposed Development to avoid and prevent adverse effects. This includes environmental working practices to ensure adequate pollution control measures are implemented and use of precautionary methods of working (PMW) during construction to minimise risks to individual animals and/or protected species where licences would not be required.

5.9 Highway Works

5.9.1 Construction of access roads, internal streets and surface parking would be undertaken following the enabling works and Site preparation on a phase by phase basis. Areas not covered by Phase 1 would be subject to Reserved Matters approval. Works would include layering of road fill material, levelling, compaction and finishing off with specified material, i.e. bitumen tarmac, paving blocks, etc.

5.9.2 CWMMC would be delivered during Phase 1 and will be a piece of key infrastructure for accessing the rest of the Site in subsequent phases of demolition and construction.

5.10 Utilities and Services Installation

5.10.1 A Utilities Statement[14] has been prepared that provides a high-level review of the requirements for utilities and services for the Proposed Development, and the impact on existing utility apparatus.

5.10.2 Existing utilities and services at the Site include:

- An overhead power line (UKPN) to the north of Rusper road that will need to be buried along Rusper Road;
- Mains potable water supplies (Southern Water) along Rusper Road bisecting the Site, within Peverel Road south-east of the golf course and other mains within the surrounding residential developments. There are likely small connections from these mains to the existing properties within the Site, such as the Ifield Golf Club clubhouse.

[14] West of Ifield Utilities Statement Existing and Proposed Utility Apparatus, Prepared by Ramboll, 2025, Version 02 (1620007949-RAM-ZZ-XX-RP-M-0001).

These are limited and will be considered in more detail and dealt with during future design stages.

- Thames Water sewers present to the west of Ifield Brook, opposite Dene Cottage along Rusper Road and to the north of Emmanuel Cottage. Based upon initial plans of the Proposed Development, it appears as though sufficient space is available to permit the sewer to remain. Access arrangements and possibly easement will need to be updated at future design changes.
- Some gas apparatus (Southern Gas Networks) may need to be temporarily protected during demolition and construction works, depending on access requirements. No gas apparatus appears to be directly affected by the proposed works; and
- Proposed overhead telecoms apparatus (Openreach), which are shown in Openreach records as bisecting the Site. Further investigation with Openreach will be undertaken as part of future design stages.

5.10.3 Prior to any demolition works taking place, the location of existing services would be identified and marked on-Site using utility record drawings and on-Site investigation techniques such as hand dug trial holes and scanning using cable avoidance tools.

5.10.4 Following the completion of these survey works, the relevant utility provider would decommission the supplies to the properties prior to works commencing.

5.10.5 Once the utility diversion/disconnections work is completed and before demolition and excavation works take place, the areas would be again scanned and a permit to dig issued by the principal contractors/contractors/sub-contractor in accordance with their Health and Safety procedures.

5.10.6 As mentioned previously, temporary utility connections would be made to existing utility services for temporary accommodation and for construction use where no existing connections exist.

5.11 Demolition and Construction Vehicles and Plant

Demolition and Construction Trips

5.11.1 In addition to demolition and construction staff transport movements, construction traffic would consist of heavy goods vehicles (HGVs) and light goods vehicles (LGVs) delivering construction materials and plant infrastructure, and removing materials from the Site, including demolition materials.

5.11.2 The Transport Assessment prepared by Steer (WOI-FPA-DOC-TA-01) indicates that the peak construction year will occur in 2033-2035, with a total of 816 one-way and 1,633 two-way (AADT) construction vehicles anticipated to be associated with the construction of the Proposed Development. Of these, 95 are two-way HGV trips.

5.11.3 It is noted that trip generation associated with construction materials may utilise a wide range of vehicle types and would be dependent on the supply chain arrangements of the selected sub-contractors. Alternatives to HGVs would be reviewed by the Principal Contractor at all reasonable stages of the demolition and construction programme.

Typical Construction Plant and Machinery

5.11.4 The types of plant and machinery that are likely to be used on-Site per development works activity are provided in Table 5.1.

Table 5.1: Indicative Plant Used During Demolition and Construction

Plant and Equipment	Demolition	Construction
Negative Pressure Units (for asbestos removal)	X	
Bulldozers	X	
Tower Cranes, Cranes and Hoists		X
Cutters, Drills and Small Tools	X	X
360° Excavators	X	X
Long Reach Excavators	X	
Crushing Plant	X	
Floodlights	X	X
Fork Lift Truck		X
Hydraulic Breakers	X	X
Hydraulic Benders and Cutters		X
Lorries / Vans	X	X
Piling Rigs		X
Scaffolding and Mobile Hydraulic Access Platforms		X
Temporary Supports, Façade Retention Systems	X	X
'X' indicates plant would be used during that stage of works		

5.12 Construction and Contracting Strategy

5.12.1 The initial enabling works and demolition works would likely be procured under a separate contract from the new construction works, and would include environmental management responsibilities.

5.12.2 A Principal Contractor / contractors would be appointed to carry out the new build works which would include environmental and logistics management responsibilities. The logistics management may also extend to overseeing logistics operations by the enabling and demolition contractors, and any other contractors, to ensure full co-ordination across the Site.

Demolition and Construction Workforce

5.12.3 It is anticipated that workforce levels would peak at approximately 1,428 operatives during the peak construction year (2034).

5.12.4 The average workforce across all phases are likely to be approximately 1,014 workers, with predicted workforce numbers estimated to be above this average between the years 2032 and 2039.

5.12.5 It is anticipated that suitable parking will be available for the number of cars and vans that would be required on-Site during the demolition and construction stage.

5.12.6 Where suitably skilled local labour is available, local labour would be used where possible and viable to do so.

Demolition and Construction Workforce

5.12.7 Working hours would be as directed by HDC.

5.12.8 General Site hours would be:

- 08:00 – 18:00 (Monday to Friday);
- 09:00 – 13:00 (Saturday); and
- No works audible at the Site boundary or any other place unless agreed by HDC on Sundays and bank holidays.

5.12.9 There may be a specific need to work outside of these hours to manage certain noisy works and deliveries to limit the impact on the local area. In these circumstances, the Principal Contractor would liaise with all parties, including HDC and local community groups and residents as applicable.

Health and Safety

5.12.10 The Principal Contractor would carry out their duties in accordance with the Construction Design Management Regulations (CDM)[15]. They would ensure that all Site personnel have the correct training and qualifications (including for working over or near water), every Site visitor would have a Site induction, there would be a programme of toolbox talks for Site operatives and the Site would be tidy and well maintained with all safety measures in place.

Access and Parking Management

5.12.11 There would be a policy of on-Site parking for personnel employed on the Proposed Development. Delivery vehicles would have designated unloading bays and would be managed by the Principal Contractor's traffic manager.

5.13 Materials, Bulk Quantities and Waste

Material Selection, Storage and Handling

5.13.1 A strategy for minimising carbon emissions would be used when selecting materials. The Detailed CEMP would detail the approach for a range of resource efficiency principles including locally sourcing materials and services, auditing materials to demonstrate environmental performance and options for reuse of supplies. It would be carried out alongside a carbon foot printing procedure that would minimise the Proposed Development's carbon demands, identify the use of renewable energy resources, and incorporate efficient energy supply and low carbon technologies.

5.13.2 The energy strategy for the Proposed Development will be decided at later detailed design stages. However, the West of Ifield Energy Strategy[16] provides guidance for future solutions that would be compliant with local and national policies.

5.13.3 Construction materials are likely to be selected following the Building Research Establishment (BRE) *'Green Guide to Specification'*. These include:

- Minimising embodied energy content (the energy used in manufacture);
- Using recyclable materials where they have high embodied energy; and
- Maximising the recycled content of the material, ease of maintenance, appropriate sourcing of materials and totally excluding deleterious and hazardous materials.

5.13.4 The 'sustainability' of raw materials would be considered during the procurement process. At the RMA stage, delivery partners would be required to demonstrate how they meet the latest best practice standards for:

- Proportion of materials sourced from companies accredited by BS8001 (or similar for a circular economy).

[15] Secretary of State, 2015. The Construction (Design and Management) Regulations 2015

[16] West of Ifield Energy Strategy, produced by Ramboll, dated 25/02/2025, version 3.

- Buildings and infrastructure designed for disassembly and adaptability.
- Buildings and infrastructure to promote material efficiency.
- Buildings and infrastructure to be durable and resilient.
- Construction materials with low embodied energy.
- Construction methods and technologies with lower environmental impact.
- Innovative methods of construction (e.g. the manufacture and prefabrication of structural building parts off-Site).

5.13.5 All construction materials would be appropriately stored on-Site to minimise damage by vehicles, vandals, weather or theft.

5.13.6 Where possible, contractors would be required to operate a 'just in time' policy for delivery of material. This means that materials would be brought to Site just before their incorporation into the works, thereby minimising the need for on-Site storage.

5.13.7 Where possible, prefabricated elements would be lifted directly into position from delivery vehicles. This would assist in reducing on-Site storage and labour requirements and construction noise levels, thereby reducing potential nuisances to the surrounding receptors.

5.13.8 Hard landscape materials removed during construction would be carefully stockpiled and protected for reuse on the Site where possible, and in accordance with appropriate waste management regulations.

5.13.9 All liquids and solids of potentially hazardous nature (e.g. fuels, oils and solvents) would be stored on surfaced areas with bunding, and within secured areas.

Waste Volumes and Management

5.13.10 The OSWMP[1] summarises the anticipated waste arisings from the demolition and construction phase of the Proposed Development based on the currently available information, and outlines recommended management options.

5.13.11 Total waste for the demolition phase is estimated at approximately 2,202 m³ based on the material volume of buildings to be demolished. The proposed waste management strategy for the demolition waste for the entire Site has not been finalised and would be confirmed by the Principal Contractor, once appointed.

5.13.12 It is expected that cut and fill operations would be balanced within the Proposed Development, to encompass the entire Site.

5.13.13 It is estimated that Phase 1 would generate approximately 49,973 m³ of material and require approximately 39,660 m³ of additional fill material. These earthworks calculations (included in the OSWMP) are based on a comparison of the current formation surfaces for the design elements versus the existing Site following the topsoil strip, based on information provided in Arcadis' Earthworks strategy[17]. All material except made ground is deemed suitable for reuse on Site for Phase 1, and a working estimate of the expected volume of made ground is 10%.

5.13.14 Future secondary and tertiary roads, and development parcels are expected to be constructed with a balance of cut and fill within each parcel and along each road. These quantities would be confirmed by the earthworks contractor prior to commencement of works.

5.13.15 Quantities of topsoil estimated to arise during excavation works for Phase 1 is estimated to be approximately 51,295 m³. Again, this volume has been sourced from the OSWMP assessment, which has been based on information provided in Arcadis' Earthworks strategy.

[17] Arcadis. 2023. West of Ifield Earthworks Strategy. October 2023. Report REF: 10051123-ARC-060-ZZ-TR-CE-00001-P02 Phase 1 Earthworks Strategy

5.13.16 Detailed construction waste volumes for the entire Site cannot be estimated at this stage of the planning process with a high degree of certainty as detailed construction methods have not yet been prepared. As indicated in this chapter, the Principal Contractor would prepare a Detailed SWMP to ensure construction waste generation is minimised and that recycling and reuse opportunities are maximised wherever possible.

5.14 Sensitive Receptors

5.14.1 A review of the Site and study area has identified the following receptors that would be sensitive to potential construction impacts:

- Existing residential communities within 100 m of the Site;
- Existing community facilities and recreational spaces;
- Existing residential properties near to the Site and future residential properties and schools within the Site once early phases of the Proposed Development are completed;
- Existing ecological receptors and open space within the Zone of Influence (ZoI) including habitats and protected species;
- Local designated sites;
- Existing above ground heritage assets;
- Below-ground archaeological remains;
- Short, medium and long-distance views to and from the Site;
- Local Landscape Character Areas (LCAs);
- Local air quality;
- Existing transport infrastructure, in particular the local highway network and public transport facilities;
- Gatwick Airport (from potential lighting impacts);
- Local workforce and economy;
- Existing public services;
- Pedestrians and road users of the surrounding roads and footpaths;
- Existing water resources;
- On-Site and off-Site flood risk, and surface water quality of the River Mole and Ifield Brook;
- Existing utilities infrastructure; and
- Existing telecommunication and radio signal receptions.

5.15 Potential Environmental Impacts

5.15.1 A review of the potential environmental impacts associated with the demolition and construction works has been undertaken to proactively inform the embedded mitigation measures of the Proposed Development.

5.15.2 Impacts can arise from day-to-day works or from individual instances of accidents, poor operation or management. The potential for these impacts to occur can be avoided or minimised through attention to management and control (e.g. watering to control dust, use of noise attenuated plant, use of a well trained workforce and properly maintained plant), under the responsibility of the Principal Contractor, by tender requirements and measures detailed in the Detailed CEMP for each phase.

5.15.3 A summary of the mitigation measures which would be integral to the Proposed Development are presented in the following section.

5.16 Mitigation and Scope of Environmental Management Controls

5.16.1 The following mitigation controls would be committed to and delivered pursuant to either planning conditions, obligations contained in a legal agreement (under Section 106 of the Town and Country Planning Act, 1990) and supported as necessary by contract obligation between the Applicant (or Principal Contractor) and relevant sub-contractors or regulatory provisions in force from time-to-time.

Construction Environmental Management Plan

5.16.2 The Proposed Development's Detailed CEMP would be prepared to comply with the OCEMP (ES Volume 2 Technical Appendix 5.1) and would include a Detailed SWMP that would be submitted for review and approval by HDC prior to commencement of works on-Site. The Detailed CEMP would be a live document throughout the demolition and construction stage and would be as necessary throughout the phases. It would include the following:

- A commitment to environmental protection (all consultants and trade contractors would be invited to declare their support for this at tender stage);
- Documentation of measures to comply with environmental aspects of any planning conditions;
- Detailed control measures and activities to be undertaken to minimise likely environmental impacts, as well as associated roles and responsibilities;
- Target criteria for environmental issues, where practical, such as water and energy consumption;
- Any requirements for monitoring and record keeping;
- Proposed noise, vibration and dust monitoring levels to be agreed with HDC;
- A dedicated point of contact during normal working hours and in emergencies with responsibility to deal with environmental issues if they arise; and
- A review and monitoring regime of on-Site performance against the Detailed CEMP provisions by the project team and regular environmental audits of its implementation.

5.16.3 The Detailed CEMP would provide the necessary level of management and control of demolition and construction practices. This includes advance notice of operations and duration of work that may cause noise, disruption to access, or other effects.

5.16.4 The Detailed CEMP would form part of tender documentation and contractors would be required to demonstrate how they would work within these provisions, identify communication channels for exchange of information and set out programmes for monitoring and auditing of environmental control systems.

5.16.5 Where departures from the Detailed CEMP are inevitable, prior identification is required, such that other mitigation measures can be considered.

Considerate Constructors

5.16.6 All contractors would be required to register the Site under the Considerate Constructors Scheme.

Principal Contractor and Management of Sub-Contractors

5.16.7 The Principal Contractor and sub-contractors would have responsibility for monitoring environmental performance; acting as a point of contact for consultation and feedback and for developing mechanisms to solve on-Site issues as and when required.

Public Liaison

5.16.8 Due to the size and scale of the Proposed Development, parts of the Site would be handed over for occupation in line with the phased demolition and construction programme while the rest of the build continues.

5.16.9 The Principal Contractor would be expected to nominate a manager who would act as the Project Environmental Manager (PEM), who would be named at all Site entrances, with a contact telephone number. The contact name and details would be provided to all the relevant stakeholders by the Principal Contractor prior to the start of the demolition and construction works.

5.16.10 The PEM would have primary responsibility for dealing with HDC, Environment Agency (EA) and other stakeholders on environmental matters, and all key stakeholders would be notified whenever a change of responsibility occurs for the PEM role. The PEM would keep neighbours, HDC and other relevant parties informed of the nature of the on-going works, their duration and programme to establish and maintain good relationships with them.

5.16.11 The PEM would deal with enquiries from the general public, including any complaints. Any complaints would be logged and reported to HDC as soon as practicable. The PEM would coordinate responses to queries and address issues in a timely and satisfactory manner.

Monitoring, Inspection and Auditing

5.16.12 The Detailed CEMP would define responsibilities and procedures for the management of the potential impacts on the environment arising during demolition, enabling and construction. A monitoring programme of the environmental effects of demolition and construction would be implemented to agreed HDC requirements. This programme would:

- evaluate the effectiveness of environmental mitigation, and identify environmental problems and appropriate responses at an early stage;
- ensure that the works are carried out in accordance with the provisions of the OCEMP (ES Volume 2 Technical Appendix 5.1); and
- identify and implement any environmental improvements that would contribute to the overall environmental performance of the Proposed Development.

5.16.13 The Applicant would wish to reassure itself that the Detailed CEMP is being adhered to by all sub-contractors. To this end, Site inspections and more formal audits would be undertaken and a checklist pro-forma, which would cover the environmental issues addressed in the Detailed CEMP. Where a problem is identified, corrective action would be identified and implemented in conjunction with the site manager and sub-contractors.

Emergencies and Environmental Incidences

5.16.14 Protocols to be implemented on-Site in instances of emergencies and environmental incidences would be set out within the Detailed CEMP for approval by HDC.

Housekeeping and General Site Management

5.16.15 Hoardings would be erected around the Site to provide a clear and secure demarcation between operational activities and other areas and to provide information regarding the Proposed Development and its progress. Particular attention would be paid to locations supporting high volumes of pedestrian movement, demolition and construction routes, access gates and security arrangements.

5.16.16 A 'clean site' policy would be maintained and contractors and their subcontractors would be expected to maintain a tidy Site. A street sweeper would be employed as required during the demolition and excavation periods of the construction programme to make sure that the streets around the Site would be kept clean during the works.

5.16.17 Hoardings would be lit from half an hour after sunset to half an hour before sunrise. Prior to the erection of any external floodlighting, details would be agreed with HDC. On-Site floodlights would be fixed to the hoarding or lighting poles. Emergency escape lighting would identify the escape route.

Residential and Open Space Amenity

5.16.18 The following mitigation and environmental controls would collectively limit potential visual, noise, vibration, traffic and dust impacts associated with the Proposed Development's construction works at the Site:

- Maintaining aesthetically appropriate Site hoardings;
- Agreeing working hours with HDC;
- Undertaking regular road sweeping;
- Arranging and locating potentially high impact Site activities and plant away from neighbouring residential receptors;
- Selecting quiet plant and regularly maintaining plant;
- Implementing good Site housekeeping measures;
- Directing Site lighting away from sensitive receptors;
- Turning Site lighting off outside of normal working hours;
- Screening scaffolding and active construction activities above hoarding levels, where practical;
- Implementing construction traffic management measures;
- Implementing and monitoring dust management measures;
- Implementing and monitoring noise and vibration measures; and
- Using temporary acoustic barriers around potentially noisy activities.

Archaeology

5.16.19 During demolition and construction works, there is the potential to impact below-ground archaeological receptors, although this would not be uniform across the whole Site.

5.16.20 A staged programme of archaeological investigation would be completed prior to the start of the demolition and construction stages. This would inform an Archaeological Mitigation Strategy, which would be secured by an appropriately worded planning condition. Mitigation measures to be included would likely include:

- Liaison with suitably qualified discipline specialist upon discovery of unexpected archaeological material; and
- Training to Site workers on what to do if archaeological remains are discovered.

Contaminated Soil

5.16.21 Demolition and construction works would be undertaken in compliance with the Detailed CEMP, which would include details of the management measures associated with contaminated land. The Detailed CEMP would be based on the OCEMP (ES Volume 2 Technical Appendix 5.1), which lists measures to minimise the potential for contamination impacts including:

- A material management plan to be prepared to manage re-use of material on-Site;
- The Principal Contractor to prepare and implement a method statement for unexpected contamination;
- All construction personnel would be required to wear appropriate Personal Protective Equipment (PPE) and to only undertake work following a Health and Safety risk assessment and a Health and Safety Induction. Hygiene and welfare facilities would need to be provided for use by construction personnel during the works;

- For the excavation and installation of abstraction boreholes the drilling methods would ensure that the sections within the overlying Weald Clay Formation will be cased and sealed;
- Chemicals, including fuel, would be stored in bunded containers at least 50 m away from any abstraction boreholes;
- Spill trays would be used when refuelling;
- Construction vehicles would be properly maintained to reduce the risk of hydrocarbon contamination and would only be active when required;
- Disposal of water removed from any excavations would be in accordance with EA requirements;
- A temporary drainage network would be installed to prevent surface runoff (silts, muds) from leaving the Site or entering surface water drains; and
- All Site works would be undertaken in accordance with the EA's Pollution Prevention Guidelines.

Water Resources

5.16.22 To ensure that no contaminant-pathway-receptor pathways are created and to reduce the potential for contamination to occur during the construction works, all Site activities would be undertaken in accordance with the requirements of the following legislation:

- Water Resources Act 1991[18];
- Water Act 2003[19];
- Control of Pollution (Oil Storage) Regulations 2001[20]; and
- EA's Pollution Prevention Guidelines 1 (PPG1), PPG2, PPG3 and PPG6[21].

5.16.23 A construction phase surface water management plan would be completed by the contractor, with consent required by the EA and Lead Local Flood Authority (LLFA) prior to works commencing, this shall be in accordance with the BS 8582:2013 - British Standard Code of practice for surface water management for development sites.

5.16.24 Due to the Proximity of Gatwick Airport, the drain down time of any construction phase surface water management feature must be less than 24 hours to comply with Gatwick Airport's requirements to mitigate the risk of bird strike. The contractor would demonstrate this to Gatwick Airport Authority within the proposed construction phase surface water management plan.

5.16.25 Any construction drainage system would be designed and managed to comply with BS6031:2009 – British Standard Code of Practice for Earthworks[22], which details methods that should be considered for the general control of drainage on construction sites. Wherever possible, the Principal Contractor would be encouraged to minimise the amounts of wastewater discharged from the Site.

5.16.26 A flood risk activity permit would be sought from the EA and a management system would be developed for carrying out the required flood risk activities related to the main rivers (River Mole and Ifield Brook). It is intended that surface runoff during construction would be discharged to existing surface water ditches within the Site, under consent to be obtained from the LLFA. An ordinary watercourse consent would be obtained from the LLFA for discharges to ditches as well as any proposed temporary or permanent modifications, such as culverts or diversions.

5.16.27 Waste from temporary welfare facilities would be disposed of by contractors or to Thames Water sewers under consent. Interceptors would be regularly inspected, cleaned and maintained. Full records would be kept of inspections, maintenance works and measures undertaken to sustain equipment performance.

[18] Secretary of State, 1991. Water Resources Act 1991. HMSO.
[19] Secretary of State, 2003. Water Act 2003. HMSO
[20] Secretary of State, 2001.Control of Pollution (Oil Storage) Regulations 2001. HMSO
[21] Planning Practice Guidance: https://www.gov.uk/government/collections/planning-practice-guidance, accessed on 17 April 2022.
[22] British Standards, 2009. BS6031:2009 – British Standard Code of Practice for Earthworks.

5.16.28 The OCEMP (ES Volume 2 Technical Appendix 5.1) lists management measures for further minimising the potential for impacts to the water environment. These include:

- Storing, handling and managing construction materials with due regard to the potential for mobilisation into surface drainage (as per the measures for contaminated land above);
- Spoil material would be stored on-Site in the short-term and stockpiles would be located away from potential drainage routes. The stockpiles would be managed to ensure minimisation of surface runoff or windblown deposition of materials to local receptors. Any contaminated material required to be disposed of would be temporarily stored separate from the clean material, on geotextile sheeting and disposed of appropriately in accordance with the standard regulatory regime;
- The use of settlement facilities would aid the removal of any potentially contaminated material that might be derived from construction materials;
- Locating above ground storage tanks on designated areas of hardstanding and not using underground storage tanks; and
- Locating the construction compound, storage and plant outside of flood zone extents. The Flood Compensation Areas must be completed prior to construction of any structures.

Ecology

5.16.29 A summary of existing habitats and potential for protected species are discussed in ES Volume 1, Chapter 8: Biodiversity. The (ES Volume 2 Technical Appendix 5.1) lists management measures for minimising potential impacts to biodiversity during the demolition and construction stage. Chapter 8: Biodiversity has been based on the following embedded mitigation which would be adopted during the development works through the Detailed CEMP. These include:

- Pollution prevention measures to prevent work causing run-off, dust, pollution or hydrological changes to habitats;
- Measures to reduce construction impacts on bats, birds, and other animals, such as appropriate timing of works where feasible, minimising night-time lighting of the Site, inspection of vegetation for potential hedgehog nests/hibernating sites prior to clearance;
- Appointment of an Ecological Clerk of Works (ECoW), to be present during work in ecologically sensitive areas and to observe and aim to limit direct mortality of protected species and mortality of common mammal species. The times and areas where work in the presence of an ECoW would be mandated;
- Training of construction workers and tool-box talks by the ECoW, including details on ecological constraints and work near sensitive habitats and species;
- Specifications for the appropriate timing of works. For example, where possible demolition and vegetation clearance works would be undertaken between September and February, outside of the bird nesting period (March to August). If not possible works should be undertaken under ecological supervision;
- Control / management of invasive plant species;
- Fencing of the CWMMC to prevent animals accessing the road;
- Measures to ensure exposed excavations would be either covered or secured (with appropriate fencing), or provided with mammal ladders and capping of pipework and services, at night-time to prevent animals such as badgers and hedgehogs becoming trapped;
- Adherence to specific mitigation strategies, which would be developed for selected sensitive ecological receptors including Great Crested Newt (GCN), reptiles, bats and birds. These would detail the appropriate additional mitigation and monitoring required for each phase of the Proposed Development, secured through a planning condition, and submitted with the European Protected Species (EPS) mitigation licence application to Natural England (NE) where required;

- Where appropriate and where mitigation cannot be undertaken in situ, translocation of protected species into new habitat areas in accordance with targeted mitigation strategies (including GCN District Level License (DLL) and other protected species licensing requirements, as appropriate);
- Adherence to buffer zones around identified woodlands on Site and protection of retained trees during construction activities in accordance with BS 5837:2012 '*Trees in Relation to Design, Demolition and Construction'*, in order to reduce the possibility of any damage, to both crown and roots of trees;
- Protection of watercourses during works, with suitable buffers where appropriate;
- As described in the Phase 1 LEMP (10051123-ARC-300-1A-TR-LA-00001), creation of vertical 'stacks' of standing dead tree trunks where the removal cannot be avoided, whereby the main trunk of the one veteran tree and standing deadwood would be cut in single sections and relocated within the retained parts of the Site where they can decompose naturally and add invertebrate habitat value; and
- Control measures outlined in the Bird Hazard Management Plan (BHMP), found in ES Volume 2, Technical Appendix 8.16, which include (but are not limited to) retention of habitat with clearance immediately prior to construction and appropriate covering of stockpiled materials/waste.

Traffic Management

5.16.30 A CTMP has been prepared for Phase 1 of the Proposed Development[11].

5.16.31 Later phases of the Proposed Development would be subject to their own CTMP at RMA. This would be developed and agreed in accordance with HDC as part of an appropriately worded planning condition to take into account legislative requirements (e.g. Highways Act 1980, the New Roads and Street Works Act 1991[23], Town and Country Planning Act 1990[24], Traffic Management Act 2004[25]) Police, Fire Authority and HSE guidance, local authority transport schemes and neighbourhood lorry restrictions.

5.16.32 The RMA CTMP and Detailed CEMP for each phase, would be reviewed and updated in line with the development programme and would include details of the following:

- Preferred hours of deliveries and removals (out of peak hours);
- Agreed demolition and construction traffic routing and Site access points;
- Road cleaning facility provisioning;
- Temporary traffic control measures;
- Temporary and permanent access to the works - for personnel/vehicles;
- Site visitor arrangements;
- Off-loading and storage areas;
- Traffic management procedures for waste disposal vehicles;
- Personnel and vehicle segregation, including precautions to protect occupiers of adjacent land or buildings;
- Equipment e.g. temporary fencing, signage etc.;
- Temporary and permanent closures and diversions of footpaths;
- Locations of cranes, if required;
- Wheel-washing facilities;
- Temporary Site offices and welfare facilities including toilets, washing facilities etc.;
- Street furniture removal, if required; and
- Site inductions.

[23] HM Government. New Roads ad Street Works Act 1991. Available online at: https://www.legislation.gov.uk/ukpga/1991/22/contents [Accessed 01/12/2022]
[24] HM Government. Town and Country Planning Act 1990. Available online at: https://www.legislation.gov.uk/ukpga/1990/8/contents [Accessed 01/12/2022]
[25] HM Government. Traffic Management Act 2004. Available online at: https://www.legislation.gov.uk/ukpga/2004/18/contents [Accessed 01/12/2022]

5.16.33 Wheel washing facilities with adjoining hardstanding would be located at the access and egress points of the Site and would be supplemented by regular road cleaning during the earthworks. Appropriate catchment areas would be provided and managed in accordance with construction drainage provisions.

Vehicle Routing and Traffic Management

5.16.34 Within the Phase 1 CTMP[11] the access point to the Site will be taken via an existing access on Rusper Road. The nearest Strategic Road Network (SRN) is the A23 Crawley Avenue. Leaving the A23 at the junction with Gossops Drive, the route the construction traffic will have to go through consists of the following roads:

- Gossops Drive;
- Overdene Drive;
- Ifield Drive;
- Tangmere Road;
- Ifield Drive;
- Tangmere Drive; and
- Rusper Road.

5.16.35 For Phase 1, estimated one-way and two-way vehicle movements, with HGV movements, has been outlined within the Phase 1 CTMP. The Phase 1 CTMP also includes measures to minimise the impact of construction-related vehicle movements estimated for the Site which have been copied below. These measures will require further development once the construction contact is formally appointed:

- Adoption of the CTMP by key stakeholders;
- Raise awareness and promote CTMP initiatives with workers and suppliers;
- Provide clear, signed and uncongested routes for construction vehicles and provide drivers with access route maps;
- Minimise car parking for construction works and encouraging them to travel by non-car modes through the induction focus;
- Forces, operatives and visitors will be encouraged to use a crew bus which will be made available to transport staff to and from nearby trains station during the day shift;
- The CTMP will outline how and when vehicles can best access the Site. It will encourage off-peak vehicle trips and proactive management to consolidate and reduce vehicle movements where possible;
- Encourage contractors to source items locally;
- Publish details of construction facilities and procedures to workers and contractors indicating the most suitable times and locations for deliveries 'best practice' suppliers/couriers;
- Use of a centralised area for loading/unloading of construction materials;
- Use of companies who are Freight Operator Recognition System (FORS) members;
- Implement a vehicle booking/management system; and
- "Just in Time" system will be operated with vehicles travelling to the Site held in a holding yard until notified by phone/radio by an on-site operative. The operative will also manage egress from the Site to prevent multiple vehicles from entering/egressing at the same time.

5.16.36 A CTMP for future phases would be developed around the need to reduce the impact of construction vehicle traffic upon the highway network. These measures will focus on encouraging sustainable construction vehicle movements to the Site and reducing any unnecessary construction-related trips, particularly during peak traffic hours. The proposed measures will be further developed once a Principal Contractor is appointed and reviewed/updated with each phase of the Proposed Development.

5.16.37 The strategy will include the following:

- Measure for reducing the effects of construction road traffic;
- Procedure for the reduction of congestion during peak periods;
- Control of material deliveries to Site;
- Protection of the public;
- Personnel transportation on and off Site;
- Separation of vehicle and pedestrian traffic;
- Enforcement of obligations; and
- Control of delivery by smaller vehicles.

5.16.38 During demolition and contractions operations the wheel washing facilities will be located adjacent to the main exit and all traffic leaving Site.

5.16.39 Any necessary lane closures on the local highway network would avoid peak periods if at all possible, and the relevant authorities (including emergency services) would again be notified as required.

HGV Management

5.16.40 Vehicles making deliveries to the Site or removing spoil or excavation material would travel via designated routes which would be agreed with HDC and the police as required.

5.16.41 The Principal Contractor would co-ordinate all deliveries and collections to/from the Site, and ensure that as far as possible:

- all delivery and collection vehicles are aware of the proposed routing;
- prior to a delivery or collection, haulers would notify the relevant authorities (Police etc.) in accordance with the Road Vehicles (Authorisation of Special Types) (General) Order 2003[26] if required;
- liaison would be undertaken with occupants of adjacent buildings to avoid delays to service deliveries due to construction vehicles; and
- deliveries would be made on a 'just-in-time' basis.

5.16.42 Larger vehicle movements would be scheduled to avoid peak hours on the local road network if possible. If an alternative construction traffic route is required this would first be agreed with HDC.

5.16.43 All deliveries would be made to the designated areas within the Site. If for any reason it is necessary to load and unload outside the Site, the details and procedure for this would be agreed in advance with HDC.

Noise and Vibration

5.16.44 Effective co-ordination and time management of demolition and construction activities would be important to avoid noise nuisance to surrounding uses. In addition, early and helpful communications with the surrounding and on-Site receptors would be undertaken to inform residents and nearby businesses of upcoming works and manage any complaints.

5.16.45 Contractors would be required to ensure that works are carried out in accordance with best practicable means as stipulated in the Control of Pollution Act 1974. A full explanation of measures to control construction noise would be incorporated within the Detailed CEMP and included in all construction method statements.

5.16.46 Demolition and construction works will only be undertaken during agreed day time hours Monday to Friday 08:00 hrs to 18:00 hrs and Saturday 09:00 hrs to 13:00 hrs. Any construction works outside of these hours would require prior approval from the Local Authorities.

[26] HM Government. The Road Vehicles (Authorisation of Special Types) (General) Order 2003. Available online at: https://www.legislation.gov.uk/uksi/2003/1998/contents/made [Accessed 30/11/2022]

5.16.47 As set out in ES Volume 1 Chapter 12: Noise and Vibration, impacts from noise and vibration during demolition and construction activities has the potential to impact existing residential properties near to the Site, as well as future residential properties on Site once the early phases of the Proposed Development are completed. Noise levels likely to be generated by the demolition and construction works have been predicted based on the type and number of plant likely to be in operation.

5.16.48 The precise scope of noise control cannot be specified until detailed construction method statements are completed. However, the following standard best practice would be implemented as a minimum:

- Where practicable, gates in hoardings to be positioned to minimise noise transmission to near-by noise sensitive buildings;
- Adopting quiet working methods, where reasonably practicable, using plant which generate lower noise and vibration levels (for example, electrically powered fixed plant will be chosen preferentially over diesel or petrol driven plant);
- Siting noisy activities away from sensitive receptors, where possible;
- Using acoustic enclosures/barriers in accordance with BS 5228 for static items of plant;
- Fitting vehicles, equipment and mechanical plant with silencers, where possible, and ensuring they are well maintained;
- Equipment that breaks concrete by bending rather than percussion will be used as far as reasonably practicable;
- Use rubber linings for chutes and dumpers to reduce impact noise;
- Switch off equipment and vehicle engines when not required;
- Minimising drop height of materials, taking care when loading or unloading vehicles, dismantling scaffolding or moving materials to reduce impact noise;
- Starting-up plant and vehicles sequentially rather than all together; and
- Managing plant movement to take account of surrounding noise sensitive receptors, as far as is reasonably practicable.

Air Quality

5.16.49 The Site preparation, demolition and construction works would be carried out in such a way so as to limit the emission to air of pollutants. Control and mitigation measures would be particularly important during demolition, earthworks and dry weather.

5.16.50 Dust and air quality will be managed during demolition and construction works to meet, amongst others, provisions of the Environmental Protection Act 1990[27], the Clean Air Act 1993[28] and other statutory requirements. A Dust Management Plan (DMP) will be included within the Detailed CEMP, to be approved by HDC.

5.16.51 A stakeholder communications plan will be developed and implemented before work commences on Site to inform local people of upcoming works and manage any complaints. The name and contact details of person(s) accountable for air quality and dust issues on the Site will be displayed and all complaints and incidents recorded in a Site log, which will be made available to HDC, if requested. Appropriate measures will be taken to reduce emissions in a timely manner, with this also being recorded in the Site log.

5.16.52 Regular liaison meetings will be held with other high risk construction sites within 500 m of the Site to ensure plans are co-ordinated and dust and particulate matter (PM) emissions are minimised.

[27] HM Government. Environmental Protection Act 1990. Available online at: https://www.legislation.gov.uk/ukpga/1990/43/contents [Accessed 30/11/2022]
[28] Secretary of State, 1993. The Clean Air Act. HMSO.

5.16.53 The OCEMP (ES Volume 2 Technical Appendix 5.1) lists management measures for minimising potential air quality impacts from dust during the demolition and construction stage. These include:

- Planning Site layout to locate dust generating activities as far as possible from receptors and planning Site operations to take into account prevailing wind patterns;
- Using prefabrication off-Site, where possible;
- Using solid screens around dusty activities and around stockpiles. Fully enclose the Site or specific operations where there is a high potential for dust production and the Site is active for an extensive period;
- Keeping Site fencing barriers and scaffolding clean using wet methods and remove dusty materials from Site as soon as possible;
- Minimising emissions from stockpiles by covering, seeding, fencing or damping down;
- Using suitable dust suppression equipment or techniques for activities likely to generate dust;
- Ensuring adequate water supply for effective dust and particulate matter suppression and ensuring suitable cleaning material is available at all times to clean up spills;
- Using enclosed chutes, conveyors and covered skips and minimising drop heights of materials;
- Soft stripping buildings before demolition;
- Avoiding explosive blasting, using appropriate manual or mechanical alternatives;
- Re-vegetating earthworks and exposed areas / soil stockpiles to stabilise surfaces as soon as practicable;
- Avoiding concrete scabbling where possible;
- Ensuring aggregates are stored in bunded areas and are not allowed to dry out and ensuring bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos. For smaller supplies of fine powder materials, ensuring bags are sealed after use and stored appropriately to prevent dust;
- Using water-assisted dust sweepers to clean access and local roads and avoid dry sweeping of large areas;
- Ensuring vehicles entering and leaving the Site are appropriately covered; and
- Installing hard surfaced haul routes, which are regularly damped down and inspected.

5.16.54 Vehicle movements on-Site may also result in air quality impacts. The following control measures would be adopted to eliminate or minimise such emissions:

- Adhering to a CTMP to manage the sustainable delivery of goods and materials, and to encourage sustainable travel;
- Ensuring vehicles engines are switched off when stationary;
- Avoiding the use of generators where possible; and
- Imposing a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas.

Waste Management

5.16.55 The Principal Contractor, once appointed, will develop a Detailed SWMP which would be agreed with HDC prior to works commencing on-Site and implemented during the demolition and construction works. The Detailed SWMP would be produced to adhere to the principles set out within the OSWMP[1].

The scope of the Detailed SWMP would include:

- Identification of the likely types and quantities of waste generated;
- Identification of waste management options in consideration of the waste hierarchy, on- and off-Site options, and the arrangements for identifying and managing any hazardous wastes produced;

- A plan for efficient materials and waste handling in consideration of constraints imposed by the Site and its location;
- Identification of waste management sites and contractors for all wastes, ensuring that contracts are in place and emphasising compliance with legal responsibilities; and
- A commitment to undertaking waste audits to monitor the amount and type of waste generated and to determine if the targets set out in the Detailed SWMP have been achieved. Targets would be reviewed and where necessary, amended. All results would be communicated to the staff.

5.16.56 In particular, the following measures should be included in the Detailed SWMP to minimise waste generation on-Site:

- Ordering the quantity of materials required for the job, thus reducing over-ordering;
- Determining when and where materials are required and requesting 'just in time' deliveries;
- Returning damaged goods or incomplete deliveries;
- Requesting suppliers to minimise packaging and to guarantee a take-back service, especially for pallets;
- Ordering materials that are cut to size, rather than standard sizes;
- Where possible and appropriate to do so, using prefabrication off-Site;
- Having appropriate storage areas ready - these should be covered to protect against rain and ideally have a hardstanding surface;
- Determining where special handling is required;
- Securing the Site to avoid theft and vandalism; and
- Ensuring good on-Site segregation of wastes.

5.16.57 Material that cannot be reused on Site would, as far as practically possible, be reused or recycled off-Site. Where recycling or reuse is not possible, the waste would be disposed of in accordance with relevant legislation.

Recycling

5.16.58 On-Site segregation and recycling of cardboard, timber, metal, plastics, plasterboard and gypsum based products would be strongly encouraged by the Applicant and Principal Contractor. The segregation of polythene film waste from other plastics would also be considered and local collections investigated.

5.16.59 It is proposed that waste would be segregated and stored for collection on-Site through the use of a series of colour coded skips and potentially equipped with compactors to take different materials. Additionally, colour coded wheelie bins would be placed at appropriate locations for each material type for manual loading. These bins would be transferred by trolleys to the relevant skip storage location.

5.16.60 Where standard sized pallets are used for material storage, then regular collections would be organised for removal and for reuse rather than disposal in timber skips.

Disposal

5.16.61 All construction materials that cannot be reused or recycled, or are classified as 'hazardous' following Waste Acceptance Criteria testing, would be disposed of at appropriately licensed disposal facilities. The destination of all waste or other materials from the Site would be notified to the relevant authority by the Principal Contractor for approval.

5.16.62 Waste material would only be deposited at authorised waste treatment and disposal sites and in accordance with the requirements of the:

- Environmental Protection Act 1990;
- Environmental Permitting (England and Wales) (Amendment) Regulations 2012[29];
- Waste (England and Wales) (Amendment) Regulations 2012;
- Controlled Waste (England and Wales) (Amendment) Regulations 2012[30];
- Hazardous Waste (England and Wales) (Amendment) Regulations 2016[31];
- List of Wastes (England) Regulations 2005[32]; and
- Duty of Care Code of Practice[33].

5.16.63 The Duty of Care Code of Practice provides practical guidance for waste holders and brokers, setting out responsibilities, relevant procedures, the two tier system for registration of waste carriers, regulations on keeping records (i.e. should waste material be removed by an appropriately registered waste carrier, a waste transfer note (WTN) or Duty of Care Waste Transfer Note is required to be completed prior to waste being transferred from one party to another, in accordance with Section 34 of the Environmental Protection Act 1990).

5.16.64 To provide evidence of licensed tipping and to prevent the likelihood of fly tipping, a docket system would be used. The Principal Contractor and its sub-contractors would operate a sequential numbered docket system to confirm that each load has been received at the approved disposal site. Copies of these dockets would be kept on-Site and would be available for inspection.

5.16.65 No burning of construction waste would take place on the Site.

Lighting

5.16.66 Demolition and construction lighting would be detailed and controlled by the Detailed CEMP to include the following:

- Lighting levels for demolition and construction lighting will be defined on a phase-by-phase basis and a task-by-task basis, in accordance with the relevant guidance and lighting levels set out in BS EN 12464-2:2014;
- Demolition and construction lighting to be maintained at a low level and focussed into the Site, onto the task being undertaken. Where possible, demolition and construction lighting is to be provided by handheld sources or headtorches, ensuring the lowest possible amount of light is used for the task at hand;
- Luminaires used for construction lighting will be fitted with baffles or shields where necessary to ensure that lighting is not directed towards potentially sensitive receptors;
- To limit the visibility of construction lighting within the landscape, it will be switched off when not in use. Task lighting for construction tasks is to be controlled by timed switches, ensuring that task lighting is only provided when needed and does not operate outside the hours of use;
- Security lighting to the construction compound will be provided by luminaires fixed to Site infrastructure, such as cabins or scaffolding pole and will be oriented downwards only. To reduce the levels of light spill leaving the Site, security lighting will be focussed into the Site only; and
- Security lighting will be controlled via photosensor, ensuring that lighting is only operational during the hours of darkness.

[29] Secretary of State, 2012. The Environmental Permitting (England and Wales) (Amendment) Regulations 2012. HMSO
[30] Secretary of State, 2012. The Controlled Waste (England and Wales) (Amendment) Regulations 2012. HMSO
[31] Secretary of State, 2009. The Hazardous Waste (England and Wales) (Amendment) Regulations 2016. HMSO
[32] Secretary of State, 2005. The List of Wastes (England) Regulations. HMSO
[33] Secretary of State. 1990. Waste Management: The Duty of Care – A code of Practice. Environmental Protection Act, Section 34. HMSO

Climate Change

5.16.67 During demolition and construction there is potential for climate events that could disrupt the programme and works and cause damage to the built infrastructure and on-Site works. Accordingly, the following measures would be incorporated:

- Hoarding locations and specifications would be identified and agreed with HDC as part of the Detailed CEMP;
- Mitigation measures for operating tall cranes during high winds would be considered within the Detailed CEMP, alongside the requirement for the Principal Contractor to implement all relevant conditions on operating procedures;
- Health and safety measures would be implemented to ensure that the demolition and construction workers are adequately protected from wind conditions and heat stress. This would include provision of necessary personal protective equipment (PPE) and Toolbox Talks to highlight the risks of heat strokes; and
- Vulnerable activities such as construction of earthworks would take place in appropriate weather conditions (taking into account construction timescale constraints). This reduces the likelihood of weather delays to these activities. Additionally, works on-Site would be undertaken in accordance with the provisions of the Construction (Design and Management) (CDM) Regulations 2015.

5.17 Deconstruction of the Proposed Development

5.17.1 Table 5.2 sets out the design life periods for the various components of the Proposed Development.

Table 5.2: Design Life Period for Proposed Development Components

Development Component	Design Life Period
Structure/Substructure	75
Floor Structure	75
Roof Structure	25
Roof Membrane Systems	25
Roof Metal Flashings	40
Metal Roof Coverings	40
Masonry Precast	75
Cladding	30-50
Render	50
Internal Wall Finishes	30
Lifts	30
Internal Finishes	10

5.17.2 The deconstruction of the Proposed Development would follow a demolition method and sequence. Safe working practices would be devised and implemented and would be undertaken according to typical dismantling techniques prevalent at the time.

5.18 Cumulative Demolition and Construction Effects

5.18.1 A number of cumulative schemes are located within a 5 km radius of the Site, or are spatially connected to the Site via the local road network. Where there is the possibility that works associated with the cumulative scheme may overlap with the demolition and construction of the Proposed Development, any potential resultant impacts have been considered in the cumulative impact assessments of ES Volume 1, Chapters 6-15.

5.18.2 Chapter 2: EIA Process and ES Methodology provides the list of cumulative schemes that have been considered.

5.19 Summary

5.19.1 The development programme for the Site comprises the demolition of existing on-Site structures, and the construction of the Proposed Development as described in ES Volume 1 Chapter 4: Proposed Development Description. The development programme for the Proposed Development as a whole is projected to be completed by 2041.

5.19.2 The proposed demolition and construction works would have the potential to cause environmental impacts. Mitigation and management measures have been developed during the course of the iterative EIA process.

5.19.3 The information contained in this Chapter, as well as the information included in the OCEMP (ES Volume 2 Technical Appendix 5.1) and the Phase 1 OCEMP[2] would inform the framework for the Detailed CEMP that would be secured by an appropriately worded planning condition and/or obligations by means of a Section 106 legal agreement.

5.19.4 The Detailed CEMP would be developed and agreed with HDC and other relevant authorities, prior to the commencement of works and would comply with the mitigation measures set out within this Chapter. In addition, works would be delivered under the Considerate Constructors Scheme.

5.19.5 The implementation of mitigation and management measures set out in appropriate documents and relevant chapters of this ES, in conjunction with periodic monitoring to ensure the implementation and effectiveness of proposed measures, would assist in avoiding significant effects from demolition and construction works and in controlling residual effects.

5.19.6 The framework presented within this Chapter and the OCEMP (ES Volume 2 Technical Appendix 5.1) is embedded mitigation and has formed the basis for the technical impact assessments presented in ES Volume 1 Chapters 6-15.