

2 EIA Methodology

Introduction

- 2.1 This Chapter explains the EIA methodology and the structure of the ES Chapters. It details the process of identifying and assessing the likely significant environmental effects of the Proposed Development.

Scoping

- 2.2 EIA scoping is an important tool for identifying the likely significant effects of a Proposed Development through its design, construction and completed phases and ensures that appropriate mitigation options are considered where necessary.
- 2.3 An informal EIA Scoping Report was submitted to HDC in November 2025, which includes justification for the topics that have been scoped out of the ES, and where appropriate signposts to standalone documents that will be submitted alongside the planning application. The Scoping Report considered:
- The extent to which technical assessments are required based on the net change from the parameters assessed by the previously consented development;
 - Interim updates in legislation, policy, or guidance since the previous 2016 ES and 2017 ES Addendum, including how the requirements of the 2017 EIA Regulations have been met;
 - The validity of the baseline data since the 2016 ES and 2017 ES Addendum and any significant changes to the baseline;
 - The continued applicability of the mitigation measures identified within the 2016 ES and 2017 ES Addendum; and
 - Whether the overall net change from the consented development would lead to any new or materially different significant effects from the 2016 ES / 2017 ES Addendum.
- 2.4 The disciplines scoped into the ES comprise:
- Socio-economics;
 - Ecology;
 - Air Quality;
 - Noise and Vibration; and
 - Climate Change.
- 2.5 It has been determined that the disciplines listed within **Table 2.1** are not considered likely to have different significant environmental effects to those reported by the 2016 ES / 2017 ES Addendum and accordingly, these disciplines have been 'scoped out' from further detailed assessment and are not included within this ES. **Table 2.1** sets out whether the topics scoped out of this ES were included as technical chapters within the 2016 ES / 2017 ES Addendum. The final column explains the justification for scoping each topic out of this ES, with reference to the above criteria.

Table 2.1: Summary and Justification for the Topics Scoped out of the ES

Topic	Scoped in / out of the 2016 ES and 2017 ES Addendum	Justification for scoping out of the 2026 ES
Contamination & Remediation	Scoped in (2016 ES Chapter 9)	Chapter 9 of the 2016 ES was informed by a Contaminated Land Desk Studyⁱ (BAE Systems Environmental, 2016). The baseline is not anticipated to have changed, and no contaminative land uses are expected to have been introduced to the Site. The chapter concluded that contamination and remediation effects would be negligible across the construction phase, as all impacts would be controlled through a CEMP and the implementation of a Quality, Safety, Health, and Environment Plan, adherence to the Control of Asbestos Regulations 2012, the Control of Pollution (Oil Storage) (England) Regulations 2001, Environment Agency Pollution Prevention guidelines, and effective site waste management practices. During the operational phase, moderate beneficial effects were anticipated for the consented development due to the reduced potential for localised contamination of soil and groundwater through remediation. It is expected that a CEMP will be conditioned in line which would detail how the effects of proposed works would be managed, including how excavated soils would be reused or reclaimed to minimise waste, and would include measures to ensure waste is properly disposed of. If contamination sources are identified, the site will be remediated to a standard agreed with HDC and the Environment Agency. Since the 2017 ES Addendum, the following reports have been published for the Site, which have been re-submitted as standalone documents in support of this outline planning application: • Desk Study Report (Geo-environmental, 2022, GE20724-DSR-MAY22); • Ground Appraisal Report (Geo-environmental 2022a, GE20724-GIR-DEC-22); and • Ground Investigation Report (Geo-environmental 2022b, GE20724-GAR-SEPT-22). The Proposed Development would be constructed in accordance with the recommendations made by the Ground Investigation Report.
Agricultural Land	Scoped in (2016 ES Chapter 10)	An Agricultural Land Classification and Soil Resources Report was undertaken by Reading Agricultural Consultants in March 2015 (Reading Agricultural Consultants Ltd, 2015)ⁱⁱ. Figure 2.1 of the report shows that the majority of the Site is classified as a mix of Grade 3b, with areas of Grade 3a which would therefore constitute best and most versatile (BMV) agricultural land. The ES chapter concluded moderate adverse effects on the direct loss of agricultural land for the whole of the consented development, comprising approximately 9.1ha of subgrade 3a land and 155.4ha of subgrade 3b. All effects would take place in the construction phase and no mitigation is applicable. It was further concluded that moderate / minor residual adverse effects to the loss of soil resource would occur during the construction phase, subsequent to mitigation through a Soil Resources Plan which would include management measures to ensure best practice soil handling, storage, and the re-use of surplus soil resources is followed in line with Defra's 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'ⁱⁱⁱ and would aim to ensure the quality of soil is maintained on site.

		When considered against the baseline of the build out of the consented development, the moderate adverse residual effects from the direct loss of sub-grade 3a land and 155.4ha of subgrade 3b land and moderate/minor adverse effects from the loss of soil resources would remain, and the previously proposed mitigation would remain applicable. As the Site has been surveyed as part of the previous outline application and the identified mitigation would remain, a full assessment of agricultural land is scoped out of this ES, as it will not demonstrably change the significance of effect previously identified.
Landscape & Visual	Scoped in (2016 ES Chapter 11)	The majority of the Site comprises farmland, and the baseline has not changed in any significant way from the previous EIA, other than some areas of recent development associated with the outline application for the consented development. At the end of October, 249 dwellings had been completed across RM1 and RM2 of the consented development. The 2016 ES / 2017 ES Addendum concluded the landscape effects for the consented development would range from moderate to minor adverse effects on landscape elements within the application site during construction and on completion (Year 1), reducing in the longer term to be minor adverse effects on the application site and wider surrounding landscape character areas, but these effects are not considered significant. Visual effects for the wider site of the consented development are predicted to be moderate adverse or lesser effects and not significant at completion, reducing significantly to result in beneficial effects in the majority cases, primarily due to the establishment and maturing of landscape planting. The chapter concluded that the development of the site would not result in any significant adverse effects upon the landscape or on visual amenity in the area surrounding the application site and includes proposals aimed at minimising the landscape and visual effect and assimilating the development into the local area. The Proposed Development is significantly smaller in comparison to the wider consented development. The building height parameters (see Figure 3.3 Building Heights Parameter Plan) are almost identical in area and height to those already approved and therefore the identified mitigation would remain. The Strategic Green Buffer previously proposed to the east on land south of the railway line has been retained within the Proposed Development. Consequently, it is expected that the same, or lesser effects would arise and the overall effect would be as per the 2016 ES / 2017 ES Addendum for the approved application. The planning application is supported by a standalone LVIA (David Jarvis Associates Ltd, 2898.4.4.4.1, 2026)^{iv} with photomontages for each option, and therefore landscape and visual has been scoped out as a technical chapter of the ES.
Archaeology & Heritage	Scoped in (2016 ES Chapter 13)	The built heritage baseline is not anticipated to have significantly changed since the previous assessment with the exception of 'The Moated House' which was de-listed in April 2022 due to loss of historic fabric. The understanding of the archaeological resource has improved, with a programme of archaeological fieldwork undertaken in 2016 and between 2022-2023, comprising geophysical survey and archaeological evaluation (trial trenching) which recorded evidence of post-medieval and modern activity. No archaeological remains of significance were identified within the Site, and it was concluded to hold low archaeological potential. The Site contains historic hedgerows. Whilst these historic hedgerows contribute to the area's rural character and legibility of the historic landscape character and are themselves important features in the landscape, contributing to biodiversity, character and visual pattern, they are not heritage assets in themselves. Important hedgerows do not comprise designated heritage assets, and do not confer a specific level of heritage significance. Rather, the Hedgerows Regulations 1997 are a notification mechanism by which sufficient notice of removal must be given to the local authority.

		The 2016 ES / 2017 ES Addendum concluded a moderate / major adverse effect to buried archaeological deposits which would be mitigated to a moderate / minor adverse residual effect through the implementation of a programme of archaeological fieldwork, a moderate / minor adverse residual effect as a result of disturbance to the setting of built heritage, and a moderate / minor adverse residual effect through disturbance to extant historic landscape features, including hedgerows. All effects were identified during the construction period and mitigation measures included sensitive design / landscape buffers and implementation of an archaeological fieldwork programme agreed with the Local Planning Authority. No effects were identified during the operational phase. The effects identified on buried archaeological deposits from the Proposed Development as part of the consented development have been reduced by the results of the recent archaeological fieldwork. No requirement for further archaeological work was made and the associated conditions attached to the consented development were satisfied (DISC/23/0101 and DC/16/1677, Condition 22). The impact on any buried archaeological resource has therefore been minimised and mitigated against, compared to that assessed for the consented development. The impacts on historic landscape elements and built heritage from the Proposed Development are not anticipated to be as extensive as those assessed for the wider outline application due to setback placement within the Site, sensitive design, hedgerow retention and landscape buffers. It is concluded that the Proposed Development would not increase the overall residual effects identified in the consented development to built heritage and historic landscape features. When considered against the baseline of the consented development, the moderate / minor adverse residual impacts on built heritage through the loss of the rural context has reduced to some extent by the degradation of the original historic landscape context and removal of agricultural character. The overall effect is considered to have been reduced. A full assessment of built heritage and historic landscape character is included within the standalone Heritage Statement (Stantec, 2026)^v submitted in support of the outline application.
Surface Water & Hydrology	Scoped in (2016 ES Chapter 17)	The NPPF and PPG (Flood Risk and Coastal Change) have been updated since the 2016 ES. However, the principles of these national policies (i.e. to sequentially plan development in areas at the lowest risk of flooding) and definition of flood zones remains unchanged since 2016. The Flood Risk Assessment (FRA) (Glanville, 2026)^{vi} assesses the Proposed Development against the SFRA produced by HDC in 2020, updated Environment Agency flood risk mapping and climate change allowances in 2025, and updated hydraulic modelling undertaken by the Applicant. The sensitivity of receiving waterbodies has not changed since the 2016 ES. The 2016 ES identified moderate adverse effects to the water quality of the receiving water bodies and existing properties due to changes in run-off rates during construction. For the completed consented development, the ES identified a substantial adverse effect on flood risk receptors in the floodplain, and moderate adverse effects on surface water run-off and the water quality of receiving water bodies. The mitigation for the construction effects would be either through measures set out in the CEMP, for example avoiding temporary storage of plant and contaminants in the floodplain. For operation, mitigation would be designing-out development in areas at risk of flooding and limiting development run-off rates through the drainage strategy. Subsequent to this mitigation, the residual effects were reported to be negligible for all construction and operational phase effects. The Proposed Development does not represent a change to the vulnerability of the land uses from the consented development – all uses are classed as “Less Vulnerable”. The mitigation measures proposed by the 2016 ES will still be implemented in the Proposed Development, as required by current national and local planning policy, including the provision of a CEMP. No development is proposed within areas identified to be at risk of flooding based on the latest flood risk mapping or hydraulic modelling and the drainage scheme and attenuation systems are designed to limit development run-off rates and volumes to existing greenfield rates and volumes. The Proposed Development includes the appropriate water treatment stages in accordance with the SuDS Manual.

		The Proposed Development proposes industrial land uses that have a higher Pollution Hazard Level than the consented commercial development. However, the 2016 ES makes provision for a range of land uses by stating that more water treatment steps can be included where higher pollution hazards exist. Therefore, the impact on water quality of receiving water bodies will increase from Medium to High and therefore the adverse effect will increase from Moderate to Major/Moderate. However, the residual effect post-mitigation will remain "Negligible" given the implementation of the previous mitigation measures proposed. When considered against the baseline of the consented development, the Proposed Development results in a minor increase in adverse effect. However, given that the identified mitigation measures remain valid, it does not result in a change to the residual effects, which remain negligible. It is therefore considered that a full assessment of Surface Water and Hydrology is not necessary, and it is scoped out of this ES.
Transport & Access	Scoped in (2016 ES Chapter 14)	The change to the baseline conditions since the approval of the consented development have been considered. A full appraisal is included within the Transport Assessment (TA), submitted as a standalone document in support of this application (Glanville, 2026a)^{vii}. The 2016 ES reported likely moderate adverse construction phase effects to driver, pedestrian and cyclist delay due to roadworks. Mitigation applied in minimising delay in the programme of works for highway improvements reduced residual effects to pedestrian delay to minor adverse, while the effects to driver delay remained moderate adverse (significant). Residual effects during the construction phase to accidents and safety were reported to be not significant. For operation, mitigation of effects to driver delay, pedestrian and cyclist delay and amenity, severance to the A264, Rusper Road, and Langhurstwood Road, fear and intimidation, and accidents and safety were all embedded, for example in providing improved pedestrian crossings of the A264 and improving traffic control measures. A major beneficial (significant) effect was reported for pedestrian and cyclist delay and amenity, severance to the A264 south of the Site, and severance of Langhurstwood Road, with the remainder of effects reported to be not significant. The proposals for pedestrian and cycle access that will be delivered through the extension of the primary road through the employment land comply with the approved wider site-wide cycling strategy and appropriate provision for public transport has been made, as agreed with the bus operator, Metrobus, and West Sussex County Council. The level of car parking proposed is broadly in accordance with the Council's parking demand standards for the mix and quantum of development proposed. Similarly, the illustrative masterplans and associated accommodation schedules indicate the level of cycle parking proposed. Further details will be provided when layout is considered at the approval of reserved matters stage. Charging facilities for electric vehicles will be provided in accordance with the relevant standards and further details will be provided at the approval of reserved matters stage. The primary road network through the employment land has been designed to accommodate HGVs, including full size articulated lorries, and public buses. The secondary road network and service yards will also be designed to accommodate HGVs. The consented development specifically tested the impact of 46,450m² of commercial employment floorspace (on the assumption that the floor space would be office use – Class B1 at the time that outline permission was granted but now Class E(g)) but not the commercial leisure facility or health centre as these were considered ancillary to the main elements of the development and would not generate significant external trips. The current proposals for a commercial leisure facility and health centre are similar in size as those previously permitted, and any changes in trip generation due to the marginally larger floor areas now proposed would be minor and are not likely to generate significant external trips. Therefore, the baseline position in terms of off-site vehicle movements is established by the traffic generation of the previously consented business park use.

		The net change in vehicle movements due to the changes proposed to the mix and quantum of employment uses compared with the baseline position from the consented development has been estimated within the TA. The previously agreed trip rates for the business park have been applied to the office element whilst appropriate trip rates for warehousing and light industrial uses have been extracted from the TRICS database and agreed in pre-application discussions with West Sussex County Council. Parcel distribution has been assumed for the warehousing element as the worst case in traffic generation terms. • Masterplan Option 1 includes the same quantum of office floorspace as the previously consented business park that formed part of the original outline planning permission. As such, there would be no change in the traffic generation of this option compared with the consented development. • Masterplan Option 2 is expected to generate 270 fewer vehicle movements in the AM peak hour and 104 fewer vehicle movements in the PM peak hour when compared with the consented development. • Masterplan Option 3 is expected to generate 129 fewer vehicle movements in the AM peak hour and 40 fewer vehicle movements in the PM peak hour when compared with the consented development. The vehicle movements generated by the consented development would primarily be cars and other light vehicles, with very few movements by heavy goods vehicles anticipated. The Proposed Development includes a combination of warehousing and light industrial uses, which will generate a higher proportion of HGV movements. However, the increases in HGVs that would arise from masterplan options 2 and 3 would be relatively modest. For junction capacity assessment purposes, traffic flows are converted to an equivalent number of passenger car units (PCUs) to take account of the differences between the physical size, weight, and performance of different vehicles. On this basis, masterplan Option 2 is expected to generate 227 fewer PCUs in the AM peak hour and 72 fewer PCUs in the PM peak hour when compared with the consented development. Masterplan Option 3 is expected to generate 101 fewer PCUs in the AM peak hour and 18 fewer PCUs in the PM peak hour. Therefore, the revised proposals for the employment land will not increase the number of external vehicle or PCU movements to/from the consented development at peak times above those expected as a result of the original outline planning permission. A comprehensive package of off-site highway improvement works was agreed as part of the original outline planning application to mitigate the traffic impact of the consented development on the local road network, including at key junctions along the A264. Given that the proposals for the employment land will not increase the number of external traffic movements to/from the consented development at peak times above those expected as a result of the original outline planning permission, no further off-site highway improvement works are considered necessary to mitigate the traffic impact of the new outline planning application on the local road network. It is concluded that the Proposed Development will not increase the number of external traffic movements, and the estimated increases in daily traffic movements are more significant, but will have no effect on the operational capacity of key junctions or local road, as overall flows will be lower than at peak times. Therefore, it is proposed to assess the environmental impact of the daily increases in traffic movements expected within the noise, air quality, and climate chapters of the ES, but it is considered to be appropriate in transport terms. Therefore, transport and access is scoped out of the ES.
Human Health	Not included as a separate technical chapter	Regulation 4(2)(a) of the 2017 EIA Regulations requires significant effects on human health to be considered as appropriate within the EIA process. It is acknowledged that human health was not considered as a separate technical topic within the ES 2016 or within the ES Addendum 2017. Baseline information was therefore not provided within the previous EIA, however, a high-level baseline and

		review was provided within the informal scoping report submitted to HDC which considered a demographic and human health profile of the Middle-layer Super Output Areas (MSOAs) that cover the areas immediately surrounding the Proposed Development and considering Office of National Statistics census data, Index of Multiple Deprivation (IMD) data, Public Health England (PHE) Fingertips data, Sports England Active Lives survey, and OHID Local Health Authority profiles. It was concluded that there is unlikely to be increased baseline sensitivity among the existing population during the construction and operation of the Proposed Development. While human health was not scoped in as a technical chapter in the 2016 ES, it was addressed through other technical chapters: • Chapter 8: Socio Economics considered the impacts of the consented development on the resident and working population, including provision of the following impacts relevant to human health: job creation; meeting housing requirements and local housing needs; school services (pre-school, primary & secondary); healthcare services; community service and buildings. There were no residual effects identified that were required to be mitigated. The effects associated with the impact on schools and healthcare have been addressed by embedded mitigation measures regarding on-site provision of these respective facilities. • Bio-physical determinants of human health were considered through the air quality, noise and vibration and surface water and hydrology assessments. All residual effects are considered to be not significant through the implementation of a CEMP. • Regarding climate change, an assessment of operational GHG emissions is scoped into Chapter 10 – Climate Change of the ES and it is considered here that no causal pathway would be able to be identified for health. • The social determinants (open space, leisure and play; transport, access and connectivity) are considered through the LVIA and TA. It is considered that open space provision, and leisure and play (comprising parks and amenity spaces, youth and children's play spaces, sports and recreational area and community facilities) exceed local requirements. • Regarding access and connectivity, the previous transport chapter of the ES did not identify any significant adverse effects relevant to human health. These conclusions are considered to remain valid, and it is considered that no additional causal pathways to human health would be identified given the sensitivity of the baseline and magnitude of change within the assessments reviewed. There is limited material difference in regard to the three options in relation to human health, particularly as the provision of the health centre remains consistent across all three options. It is considered that the 'worst-case option' for the Proposed Development in regard to human health is Option 2 (see Chapter 3 – Site and Development Description). This option selection is aligned with the socio-economic assessment of net job change, as a key wider human health determinant. 2,000 sqm floorspace (GIA) is proposed for the Health Centre, which is equivalent to that originally proposed for the consented development, with the addition of a 70sqm pharmacy. The 2016 ES identified a population increase of approximately 6,600 residents. Assuming a worst-case scenario of every resident requiring a new GP registration, using Healthy Building Note 11-01, this would require a GIA of approximately 566 sqm. The provision therefore well exceeds this need. It is noted that the Applicant and the local Integrated Care Board (ICB) are progressing conversations regarding technical delivery mechanism for this mitigation on Site. As the ICB is the ultimate authority for commissioning health services it is considered that this is sufficient to assume that this mitigation is acceptable for healthcare infrastructure. Finally, it is noted that the build out of previously consented phases may generated some potential sensitive human health receptors, including residential receptors that may be impacted by the Proposed Development. However, it is considered that these had been
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		considered within the consented development in relation to the previous land use and therefore, the Proposed Development will not generate any new human effects. It is considered that the consented development and other technical chapters adequately assess human health effects and there would be no standalone significant effects where a causal pathway would need to be assessed. Furthermore, the net change between the Proposed Development and the consented development is not considered to generate any significant impacts that have not been assessed within the 2016 ES and 2017 Addendum. Therefore, human health is scoped out of this ES.
Daylight, sunlight, and overshadowing	Scoped out	The scale and massing of the Proposed Development is unlikely to cause changes to daylight and sunlight availability, or cause overshadowing of residents or amenity space. Therefore, likely significant daylight, sunlight, and overshadowing (DSO) effects are not anticipated, and it is proposed to scope out an assessment of DSO from the ES
Wind microclimate	Scoped out	The Proposed Development will not include any high-rise buildings which could influence wind patterns. The maximum height of all buildings would be up to 16m above existing ground level (-6m / +2m). Therefore, likely significant wind effects are not anticipated, and it is proposed to scope out an assessment of wind microclimate from the ES
Waste	Scoped out	The Proposed Development will result in the generation of waste materials during the construction and operational phases. Waste generated during construction would consist of excavated materials not used in site landscaping, damaged and excess construction materials and packaging. Waste generated during the operational phase would consist predominantly of Municipal Solid Waste (MSW). It is acknowledged that waste was not considered as a separate technical topic within the 2017 ES Addendum. However, Table 2.1 in the 2016 ES states that '<i>the use of natural resources; c. the emission of pollutants, the creation of nuisances and the elimination of waste,</i>' were considered within the technical assessments in chapters 8-17. Therefore, waste has been considered previously in the 2016 ES within each technical chapter. The construction phase of the Proposed Development is not anticipated to produce significant amounts of waste to the extent that the creation or disposal of which would give rise to significant effects on the environment. During operation, the introduction of the Proposed Development will result in an increase in the operational volume of MSW arising from the site. Waste and recycling would be collected, recycled and disposed of by the local collection service. The design of the Proposed Development will enable sufficient space to meet current waste collection requirements. Therefore, significant effects are not anticipated in relation to waste so this topic area has been scoped out of this ES.
Lighting	Scoped out	Lighting will be designed carefully in accordance with the relevant British Standards and Institute of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light (GN01-2021) ^{viii} , BS 5489-1:2020 ^{ix} and BS EN 13201-2:2015 ^x . Therefore, the Proposed Development is not anticipated to produce a significant lighting impact, so this topic area has been scoped out of this ES.
Accidents & Disasters	Scoped out	The 2017 EIA Regulations require a development to identify the potential significant effects arising from any vulnerability to major accidents or disasters (earthquakes, fire, or flooding among others). The construction and operation of the Proposed Development comprise well understood processes that would be controlled by strict health and safety legislation and therefore there would be no expected accidents or disasters. The Site is not in a location which is at risk of disasters such as land instability or earthquakes.

		For construction, the implementation of best practice measures would mitigate any risks of potential contaminants and procedures for safe materials handling and storage. An FRA has also been undertaken for the application which confirm that the Proposed Development is not at risk of flooding, and does not increase flood risk elsewhere.
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Approach to Technical Assessments

- 2.6 Technical assessments have been undertaken in accordance with current best practice. Specific guidance used is referenced within each of the respective assessment chapters. Assessments have involved desk-based research, Site inspections and surveys, impact prediction and mitigation.
- 2.7 The assessment and conclusions of the ES are based on the description of the Site and Proposed Development Description provided in **Chapter 3**.

Assessment Methodology

- 2.8 The EIA Regulations stipulate that an ES should identify, describe, and assess the likely significant effects of a development on the environment. Therefore, this ES identifies and assesses the likely significant effects of the Proposed Development in relation to the construction and operational phases. Environmental effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement. Limitations and assumptions are identified in the relevant assessment in chapters 6-10.

Structure of Technical Chapters

- 2.9 Each technical chapter of the ES (Chapters 6-10) has been set out broadly in line with **Table 2.2**.

Table 2.2: Structure of the Technical Chapters

Heading	Content
Introduction	Each of the technical chapters begins with an introduction providing context to the EIA undertaken.
Policy Context	This section includes a brief summary of policies of relevance to the environmental discipline and explains its purpose in the context of the Proposed Development and the ES.
Assessment Methodology	This section describes the method and approach employed in the assessment of likely significant effects, the criteria against which the significance has been evaluated and the sources of information used. Relevant legislation is also identified.
Limitations and Assumptions	This section discusses any difficulties encountered in compiling the required information, as well as assumptions made about data sources, baseline conditions or assessment of effects.
Baseline Conditions	This section describes and evaluates the baseline environmental conditions i.e. the current situation and where necessary, anticipated changes over time should the Site remain undeveloped (i.e. the Future Baseline). The Future Baseline includes the build out of the remainder of the Reserved Matters applications for the consented development (DC/16/1677) surrounding the Site.
Likely Significant Impacts	This section identifies the likely significant effects on the environment resulting from the Proposed Development during the construction and operational phases. A description of the likely significant effects of the Proposed Development and an assessment of their predicted significance is provided. Likely significant effects have been assessed considering only embedded mitigation that will be secured through the Parameter Plans (Figures 3.1-3.3) submitted with this ES.
Mitigation Measures	This section describes the measures which would be implemented to mitigate against potential adverse impacts. Where possible, enhancement measures have also been proposed. An assessment of significant effects will first be made based on the embedded mitigation, with the significance of effects being reassessed with the inclusion of the proposed additional/tertiary mitigation.
Residual Effects	The residual effects, i.e. the remaining effects of the Proposed Development assuming implementation of the proposed mitigation measures, have been estimated and presented.
Cumulative Effects	This section considers the cumulative effects of the Proposed Development with committed developments (set out in Table 2.7 below) identified within the vicinity of the Site. Any significant effects on the environment arising in this respect are set out within each technical chapter.
Summary	Each technical chapter concludes with a brief summary outlining the potential residual effects for the construction phase and operation phase of the Proposed Development.

Likely Significant Effects

- 2.10 The assessment of impact significance has been undertaken using appropriate national and international quality standards. Where no such standards exist, the judgements that underpin the attribution of significance are described. The guidelines, methods and techniques used in the process of determining significance of effects are contained within each of the technical chapters.

Magnitude

- 2.11 The methodology for determining the scale, or magnitude, of effect is set out in **Table 2.3**.

Table 2.3: Methodology for Assessing Magnitude

Magnitude of Impact	Criteria for assessing impact
Major	Total loss or major / substantial alteration to key elements / features of the baseline conditions such that the post development character / composition / attributes will be fundamentally changed.
Moderate	Loss or alteration to one or more key elements / features of the baseline conditions such that post development character / composition / attributes of the baseline will be materially changed.
Minor	A minor shift away from baseline conditions. Change arising from the loss/alteration will be discernible / detectable but not material. The underlying character/composition/attributes of the baseline condition will be similar to the pre-development circumstances / situation.
Negligible	Very little change from baseline conditions. Change barely distinguishable, approximating to a 'no change' situation.

Sensitivity

- 2.12 The sensitivity of a receptor is based on the relative importance of the receptor using the scale in **Table 2.4** below.

Table 2.4: Methodology for Determining Sensitivity

Sensitivity	Examples of receptor
High	The receptor / resource has little ability to absorb change without fundamentally altering its present character, or is of international or national importance.
Moderate	The receptor / resource has moderate capacity to absorb change without significantly altering its present character, or is of high importance.
Low	The receptor/resource is tolerant of change without detriment to its character, is of low or local importance.

Duration of Effect

- 2.13 The duration of an impact can be measured as short, medium and long term, as defined in **Table 2.5**.

Table 2.5: Duration of Effect

Duration	Explanation
Short Term	An effect lasting between 0 and 5 years.
Medium Term	An effect lasting between 5 and 10 years.
Long Term	An effect lasting more than 10 years.

Significance

- 2.14 The significance of an environmental effect is determined, applying professional judgement, with reference to the interaction of magnitude and sensitivity, whereby the impacts can be beneficial or adverse. **Table 2.6** shows how magnitude and sensitivity interact to derive effect significance.

Table 2.6: Methodology for Assessing Significance

Magnitude	Sensitivity		
	High	Moderate	Low
Major	Major Adverse / Beneficial	Major - Moderate Adverse / Beneficial	Moderate - Minor Adverse / Beneficial
Moderate	Major - Moderate Adverse / Beneficial	Moderate – Minor Adverse / Beneficial	Minor Adverse / Beneficial
Minor	Moderate - Minor Adverse / Beneficial	Minor Adverse / Beneficial	Minor Adverse / Beneficial - Negligible
Negligible	Negligible	Negligible	Negligible

- 2.15 The above magnitude and significance criteria have been provided as a guide for technical specialists to assess impact significance. Where discipline specific methodology has been applied that differs from the generic criteria above, this has been clearly explained within the given chapter under the heading of Assessment Methodology. Where there are two possible outcomes, a single level of significance should be determined based on reasoned judgement. Any effects of a 'Minor' or 'Negligible' magnitude are considered 'Not Significant' in EIA terms, with those of 'Moderate' or 'Major' magnitude considered 'Significant'.

Mitigation

- 2.16 In accordance with 2024 ISEP Mitigation in EIA Guidance mitigation is defined as follows:

- Primary mitigation (also known as embedded mitigation): *“Modifications to the location or design of the development made during the pre-application phase that are an inherent part of the project, and do not require additional action to be taken.”*
 - Primary mitigation example: avoiding a key habitat or archaeological feature through the development's layout and operation.
- Secondary mitigation: *“Actions that will require further activity in order to achieve the anticipated outcome. These may be imposed as part of the planning consent.”*
 - Secondary mitigation example: Describing certain lighting limits, which will be subject to the submission of a detailed lighting layout as a condition of approval.
- Tertiary mitigation: *“Actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements, or actions that are considered to be standard practices used to manage commonly occurring environmental effects.”*
 - Tertiary mitigation example: activities within a draft Construction Environmental Management Plan (CEMP).

- 2.17 Primary / embedded mitigation measures included within the Proposed Development have been described in **ES Chapter 3 – Site and Development Description** and identified as relevant within each technical chapter. Where practicable or necessary, secondary and / or tertiary mitigation measures have been put forward. The residual effect is determined following the implementation of secondary / tertiary mitigation. Mitigation measures have been considered based on the following hierarchy of mitigation:

- Avoidance;
- Reduction;

- Compensation;
 - Remediation; and
 - Enhancement.
- 2.18 Where the effectiveness of the mitigation proposed has been considered uncertain, or where it depends upon assumptions of operating procedures, data and / or professional judgement has been introduced to support these assumptions.
- 2.19 The opportunity for enhancement measures has also be considered, where appropriate.
- 2.20 Mitigation recommended during the construction phase will be set out in the CEMP to be agreed with HDC prior to the commencement of work and implemented throughout the duration of the works. An outline of general measures that will likely be adopted through the construction phase are referred to in Chapter 5 of the ES.
- 2.21 Secondary and tertiary mitigation to be implemented during the construction and operational phases will be secured through planning conditions and obligations.

Cumulative Effects and In-Combination Effects

Cumulative Effects

- 2.22 A requirement of the EIA Regulations is to assess cumulative effects which are generally considered to arise from the combination of effects from the Proposed Development together with other cumulative developments in the vicinity, acting together to generate elevated levels of effects.
- 2.23 The 2016 ES and 2017 ES Addendum considered a list of cumulative schemes (listed within Table 3.3 of the 2016 ES and Table 18.1 of the 2017 ES Addendum). The majority of these developments were consented between 2010 and 2015 and are considered to have been built out so now form part of the baseline for the Proposed Development.
- 2.24 A number of committed developments, which have the potential to lead to likely significant effects on the environment, have been identified from a review of the planning applications on HDC's planning pages in November 2025. These committed developments are summarised in **Table 2.7**. These schemes include planning applications which have come forwards for sites which have been allocated by HDC.
- 2.25 Each scheme set out below which constitutes EIA development will have considered the potential for cumulative effects with the outline application for the consented development if necessary, as part of its consenting process, as set out within the final column of **Table 2.7**.
- 2.26 The net change between the consented development (DC/16/1677) and the Proposed Development has been considered within each of the technical chapters to inform the scope of the updated assessment. The Site was previously proposed as a business park and the health and commercial leisure facilities were proposed to be located elsewhere within the consented development. Therefore, a degree of professional judgement has been applied to avoid double counting effects reported by the previous ES, focusing the assessment on where the changes of use may materially change the effects.
- 2.27 For the assessment of air quality, noise and vibration, and climate change, transport data has been used which applies a growth factor to the baseline AADT flows, which takes account of planned and allocated development, and also includes traffic generated by the previously consented business park. Therefore, cumulative schemes have been inherently considered within the air quality, noise, and climate change assessments.
- 2.28 Chapter 6 – Socioeconomics, considers the effects of the Proposed Development on jobs, employment, and economic output. The proposed health centre and commercial leisure uses were

previously proposed outside of the OPP Business Park. Rather than assess the health centre and commercial leisure uses as a 100% net addition to the Proposed Development, only the net increase in the floorspace for commercial leisure uses (+200 sqm) has been assessed. Given the minor change in the proposed floorspace for the health centre with the incorporation of a pharmacy, a neutral position is proposed. The employment delivered by the Proposed Development has further been considered cumulatively with the employment provided by the secondary school and the local centre within the consented development, as well as employment from three of the committed developments listed below.

- 2.29 Where relevant, these developments are included in the consideration of cumulative effects set out in Chapters 6-10.

Table 2.7: Cumulative Developments

Scheme Name and Reference Number	Description	Planning Status	Direction / distance from Site	Consideration of the consented development as a cumulative scheme?
DC/26/0671 Land off Old Crawley Road, Faygate, West Sussex	Outline application for a development of up to 120 dwellings with all matters reserved except for access	Pending consideration. Application submitted April 2026.	200m south west.	No. Not EIA development.
EIA/24/0006 Brookvale Land at Kingsfold, Dorking, West Sussex Allocation ref: HOR3007	EIA scoping opinion request for development of the site for a new garden village comprising approximately 2,125 homes, including extra care provision, employment uses, primary school provision, a solar farm, a new railway station and a local centre.	Scoping opinion for EIA submitted December 2024	Approx 2.8km north east	Yes. Page 23 of the Scoping Report submitted to HDC (CBRE Ltd, 2024) ^{xi} lists DC/16/1677 as a committed development.
DC/10/1612 Holmbush Farm Landfill Site, Crawley Road, Faygate, West Sussex Allocation ref: HOR807	Outline approval for the development of approximately 2500 dwellings, access from A264, neighbourhood centre, main pumping station, land for primary school and nursery, land for employment uses, new rail station, energy centre and associated amenity space. Full planning permission for engineering operations associated with landfill remediation and associated infrastructure including pumping station. Full permission for the development of Phase 1 of 291 dwellings, internal roads, garages, driveways, 756 parking spaces, pathways, sub-station, flood attenuation ponds and associated amenity space. Full permission for the construction of a 3 to 6 metre high (above ground level) noise attenuation landform for approximately 700 metres, associated landscaping, pedestrian/cycleway and service provision (land known as Kilnwood Vale)	Granted 2011. Appears to be still being built out.	Approx 3km north east.	No. The ES was submitted in 2011 and was cumulatively considered by the 2016 ES.
DC/25/1312 Land West of Ifield Charlwood Road Ifield West Sussex (Allocation ref HOR3784)	Hybrid planning application for a phased, mixed use development comprising: A full element covering 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, alongside: An outline element (with all matters reserved) including 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	Pending approval. Submitted August 2025	Approx 4.4km north east	Yes (see page 4 of Chapter 16 – Cumulative Effects within the ES submitted with this application (Homes England, 2025 ^{xii})). The only significant cumulative effects reported with the consented development were reported for agricultural land.

Scheme Name and Reference Number	Description	Planning Status	Direction / distance from Site	Consideration of the consented development as a cumulative scheme?
	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. This 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.			
DC/17/2481 Land to the west of Phase 1 Kilnwood Vale Crawley, Faygate West Sussex	Outline planning application for the development of approximately 227 dwellings (between 204 and 250 dwellings) with the construction of a new access from Calvert Link, a pumping station and associated amenity space (all matters reserved except for access). DC/21/2246 (HOR986) application for Phase 6b currently pending approval (for which an ES Addendum has been provided ^{xiii}) DC/20/2223 approved May 2021.	Decided 2018	Approx 3.3km to the north east. Not clear whether its been built out.	No. The ES (Savills, 2017 ^{xiv}) states at page 5.2 that it was agreed with HDC to only consider the wider Kilnwood Vale scheme with respect of landscape and visual effects.
DC/18/2687 FP09 (24/25) Horsham Enterprise Park, Parsonage Road, Horsham, RH12 5AB	18.6 acre site housing a former Norvartis Pharmaceutical facility north of Horsham town centre. Comprises a new 260-home residential development. Proposals include townhouses, mews houses, gatehouses and the conversion of the art deco office block into residential apartments. RMAs have been submitted for Phase 1 (DC/23/0183) and Phase 2 (DC/23/0171) but have been withdrawn.	Consented 2018	2.4km to the south west of the Site.	N/A. Not EIA development.
DC/25/0151 Land to the north and south of Mercer Road, Warnham, West Sussex	New neighbourhood of 304 homes on a greenfield site north of Horsham, the development would be a mix of flats and houses, along with a convenience store, public open space, landscaping and a car park for Warnham Railway Station.	Pending planning approval (submitted March 2025)	2km east of the Site	N/A. Not EIA development.
WSCC/067/19 Brookhurst Wood Waste Management Complex	Closed landfill site that is undergoing restoration, other activities that are currently undertaken include Mechanical Biological Treatment (MBT) of waste and the recycling of road sweepings through an Aggregate Treatment and Recycling Facility (ARTF). Operational since 2014, ongoing applications / variations to restoration works.	Variation of conditions last submitted June 2024	2km north west of the Site	The restoration of the landfill (DC/2919/06(NH)) was considered cumulatively within the 2016 ES

Scheme Name and Reference Number	Description	Planning Status	Direction / distance from Site	Consideration of the consented development as a cumulative scheme?
DC/25/0629 Former Novartis Site. Parsonage Road, Horsham, West Sussex	Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.	Submitted April 2025	Approx 1.9km south west of Site	N/A. Not EIA development.
DC/25/0415 / HOR3068 Former Novartis Site. Parsonage Road, Horsham, West Sussex	The construction of 244 new homes (Use Class C3) with vehicular and pedestrian access from Parsonage Road, public open space, landscaping, parking and associated works.	Consented January 2026	Approx 1.9km south west of Site	N/A. Not EIA development.

- 2.30 Where relevant, each technical chapter (**Chapters 6-10**) has assessed the potential for likely significant cumulative effects on the environment as a result of the addition of the Proposed Development alongside the above cumulative schemes.

In-Combination Effects

- 2.31 In-combination effects, which are also known as interactive effects, are those resulting from multiple impacts / aspects of the Proposed Development affecting a single receptor.
- 2.32 In-combination effects have been assessed and have considered all completed technical assessments. The in-combination effects can be found in the Summary and Residual Effects chapter of the ES (**Chapter 11**). Assessment is qualitative, based on professional judgment following review of the conclusions of the technical assessments taken together and in-combination.

Residual Effects

- 2.33 The likely significant effects on the environment, assuming the successful implementation of mitigation measures proposed, have been identified within each technical chapter (Chapter 6-10).

Limitations and Assumptions

- 2.34 The principal assumptions that have been made and any limitations that have been identified in preparing the ES are set out in each technical chapter. General assumptions include the following:
- Assessments assume the baseline conditions at the time of ES preparation (2026) unless otherwise stated in the technical chapter;
 - Assessments consider the future baseline conditions of the build out of the remainder of the consented development where necessary;
 - It is assumed that current surrounding land uses will not change, with the exception of the cumulative schemes identified, including the build-out of the consented development which has been considered in the baseline and future baseline;
 - Assessments are based on published sources of information and primary data collections. Sources are provided as necessary;
 - Information received by third parties is complete and up to date;
 - Assessments are based on the description of development and parameter plans set out in **Chapter 3** and the anticipated construction phasing and methodology described in **Chapter 5**;
 - Assessments conclude the “worst case” effects that would arise for their topic from the three land use options and parameter plans for the Proposed Development as defined in **Chapter 3**;
 - The design, construction and completed stages of the Proposed Development will satisfy minimum environmental standards, consistent with contemporary legislation, practice and knowledge;
 - Conditions will be attached to the planning permission that will control disturbance during the construction works;
 - Necessary off-site infrastructure services for the Proposed Development will be provided by statutory undertakers; and
 - Planning permission for the Proposed Development, if granted, will contain conditions that will be sufficient to limit the Proposed Development to that assessed.

Objectivity

- 2.35 The technical assessments undertaken within the ES have been progressed in a transparent, impartial and unbiased way with equal weight attached, as appropriate, to beneficial and adverse effects. Where possible, this has been based upon quantitative and accepted criteria together with the use of value judgements and expert interpretations.
- 2.36 The assessment has been explicit in recognising areas of limitation within the ES and any difficulties that have been encountered, including assumptions upon which the assessments are based. Where appropriate, the assessment of significance has been given confidence levels.

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- ⁱⁱⁱ Department for Environment, Food & Rural Affairs. 2011. Code of practice for the sustainable use of soil on construction sites. Available from: [Code of practice for the sustainable use of soils on construction sites - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214541/Code_of_practice_for_the_sustainable_use_of_soils_on_construction_sites_-_GOV.UK)
- ^{iv} David Jarvis Associates (2026). Land North of Horsham Employment Land – Landscape and Visual Impact Assessment.
- ^v Stantec (2026) Heritage Statement: Employment Land, Mowbray.
- ^{vi} Glanville (2026). Flood Risk Assessment. Mowbray, North Horsham, West Sussex Employment Land. 242_8220585.
- ^{vii} Glanville (2026a). Transport Assessment. Mowbray, North Horsham, West Sussex Employment Land. 239_8220585
- ^{viii} Institution of Lighting Professionals (2021). GN01 For the reduction of obtrusive light 2021. Available from: <https://theilp.org.uk/resource/gn01-ilp-guidance-note-1-the-reduction-of-obtrusive-light-2021.html>
- ^{ix} British Standard 5489-1:2020. (2020). Design of road lighting – Lighting of roads and public amenity areas. Code of practice. Available from: <https://knowledge.bsigroup.com/products/design-of-road-lighting-lighting-of-roads-and-public-amenity-areas-code-of-practice>
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- ^{xi} CBRE (2024). Brookvale Garden Village Request for an Environmental Impact Assessment Scoping Opinion. North Horsham Estates Limited c/o Wain Estates Limited. Available online from: https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=B6E856DCE09D4283ACF36E677376EB69
- ^{xii} Homes England (2025). West of Ilfield, Crawley. Environmental Statement Volume 1: Main Report. Chapter 16 Cumulative Effects. Available online from: https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0F6EA9479B324D83B002DD0C207240A9
- ^{xiii} Savills (2021). Environmental Statement Addendum. Kilnwood Vale Phase 6B Environmental Impact Assessment. Environmental Statement Addendum.
- ^{xiv} Savills (2017). Environmental Statement Volume 1: Main Statement. Kilnwood Vale Reserve Land. Available online from: https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=5E74DEBDC86411E7A0700050B6D2C73B