

Mowbray, Employment Land Road, Mowbray

Environmental Impact Assessment Scoping Note



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Horsham)

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Table of Contents

1	Introduction.....	1
1.1.1	Background.....	1
1.1.2	Scope	3
1.1.3	Site and Proposed Development.....	3
1.1.4	Legislation, Policy, and Guidance.....	5
2	Review against the 2016 ES and 2017 ES Addendum.....	7
2.1.1	Chapter 8 Socio-Economics	7
2.1.2	Chapter 9 – Contamination and Remediation	8
2.1.3	Chapter 10 Agricultural Land.....	9
2.1.4	Chapter 11 - Landscape and Visual.....	9
2.1.5	Chapter 12 - Ecology	11
2.1.6	Chapter 13 - Archaeology and Heritage.....	12
2.1.7	Chapter 14 - Transport and Access.....	13
2.1.8	Chapter 15 - Air Quality	14
2.1.9	Chapter 16 - Noise and Vibration	15
2.1.10	Chapter 17 - Surface Water and Hydrology	16
2.1.11	Additional Topics Scoped Out	17
2.1.12	Waste	18
3	Conclusion	20



1 Introduction

This Environmental Impact Assessment ('EIA') Scoping Note has been prepared by Stantec on behalf of Legal & General (Strategic Land North Horsham) (the 'Applicant') to act as an informal Scoping Opinion request to Horsham District Council (HDC) for the proposed Environmental Statement (ES) in support of the full application for the following : *'Construction of Primary Road from the Left-In, Left-Out junction with the A264 (constructed pursuant to Outline Planning Permission DC/16/1677) to Bush Lane (Bridleway 1585), footpaths and cycleways, foul and surface water drainage including a SUDS basin and foul pumping station, landscaping, substations and associated infrastructure.'*

To aid the reader, the following terms have been used within this note:

- The '2016 ES' is used to describe the ES which was submitted in August 2016 to HDC (Ref: DC/16/1677) for *a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m²), retail, community centre, leisure facilities, education facilities, public open space, landscaping and retail infrastructure*. It was validated on 4 August 2016.
- The '2017 ES Addendum' is used to describe the Addendum to the 2016 ES that was submitted to provide additional information in response to statutory consultees. These changes did not affect the original mitigation measures and residual effects from the 2016 ES.
- The 'consented development' is used to describe the development that was approved by HDC in March 2018 subject to the outline planning application (Ref: DC/16/1677).
- The 'Proposed Development' is used to describe the full application for the construction of the Primary Road, footpaths and cycleways, foul and surface water drainage, including a SuDS basin, and foul pumping station, landscaping, substations, and associated infrastructure.
- The 'Site' is used to describe the red line boundary, presented in Figure 1.2 below.

1.1.1 Background

An ES was submitted in August 2016 to HDC (Ref: DC/16/1677) for a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m²), retail, community centre, leisure facilities, education facilities, public open space, landscaping and retail infrastructure. The following topics were scoped into the ES:

- Socio-economics;
- Contamination and Remediation;
- Agricultural Land;
- Landscape and Visual;
- Ecology;
- Archaeology and Heritage;
- Transport and Access;



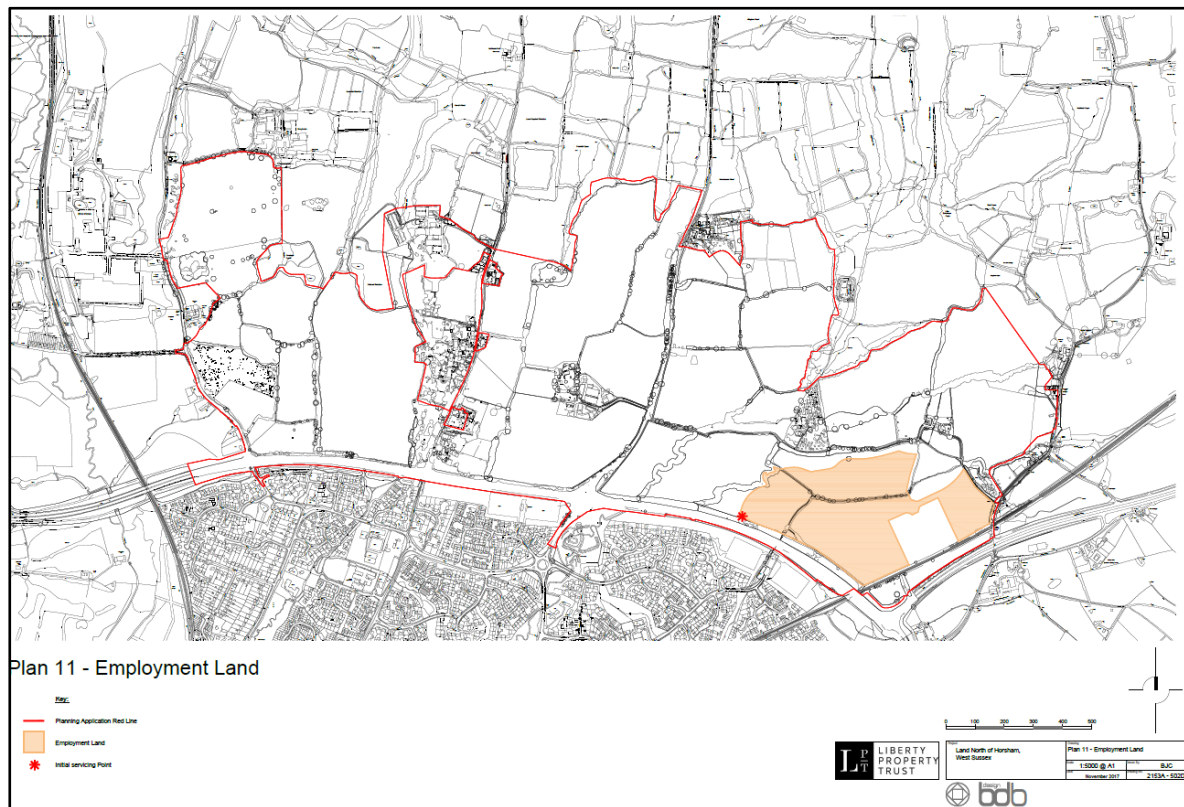
- Air Quality;
- Noise and Vibration; and
- Surface Water and Hydrology

In March 2017, an ES Addendum was submitted to provide additional information in response to the comments received by statutory consultees. These changes did not affect the original mitigation measures or residual effects from the 2016 ES.

Outline Planning Permission was granted by HDC in 2018 for a *'mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m²), retail, community centre, leisure facilities, education facilities, public open space, landscaping and retail infrastructure'* (Ref: DC/16/1677).

The time limit for the submission of Reserved Matters, pursuant to the Outline Planning Permission, on the Employment Land has passed. This includes the southern section of the Eastern Link Road, land reserved for employment and a rail station (see shaded area of Employment Land on Figure 1.2). The planning conditions for the outline application have begun to be discharged across the wider Site and construction has begun on the approved Reserved Matters applications.

Figure 1.1: Submitted Plan 11 – Employment Land



The construction of this section of the road is considered necessary to bring forward the other elements of the Proposed Development, including the sports hub and development within Phase 2, and to facilitate access to the A264.

1.1.2 Scope

This EIA Scoping Note is required as the previous ES and ES Addendum report **major beneficial and moderate beneficial / adverse residual effects** which are deemed to be **significant in EIA terms**. Although the scale of the Proposed Development is unlikely to require a full EIA in isolation, the Proposed Development has potential to result in significant cumulative effects when considered with the outline application.

This EIA Scoping Note seeks to provide an **informal EIA scoping** and sets out the approach we have taken in considering whether technical topics are relevant for inclusion in an ES to support the full application for the Proposed Development to facilitate completion of the Sports Hub and access to the eastern parcels of Phase 2.

The EIA Scoping Note considers the extent to which technical chapters are needed due to changes in circumstances and the baseline at the Site, updates to legislation, the passage of time since the consented scheme was granted. To inform this EIA Scoping Note the following four considerations have been reviewed:

- Confirmation that the design and layout of the Proposed Development falls within the parameters assessed in the 2016 ES and 2017 ES Addendum, and that Proposed Development would not result in any new or materially different significant effects from the 2016 ES or 2017 ES Addendum;
- 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
- The continued applicability of the previously identified and conditioned mitigation measures as identified within the 2016 ES and 2017 ES Addendum.

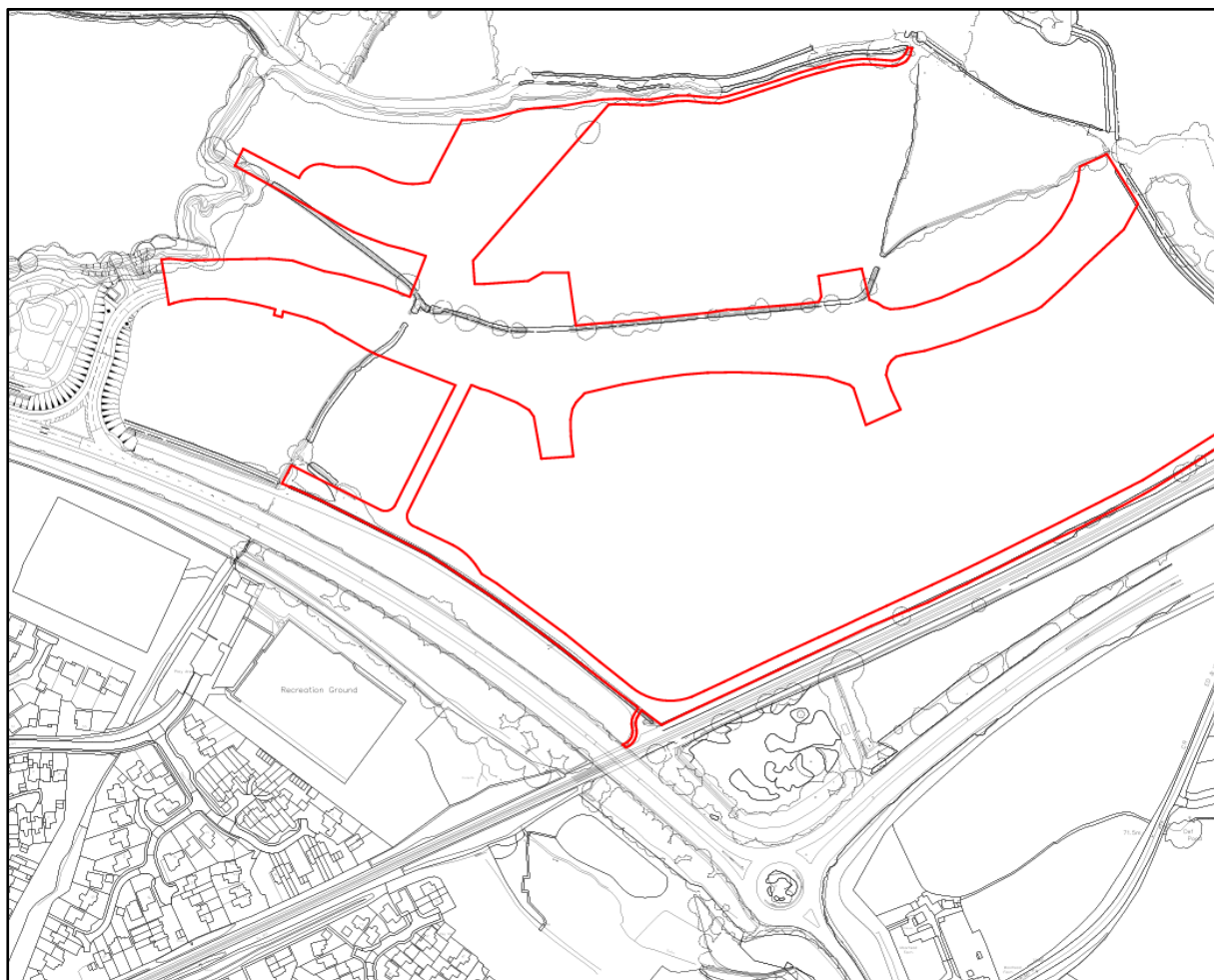
Where it is considered that against the above four criteria no significant changes to the previously assessed significant effects would take place, it is proposed that the technical area is scoped out of the ES.

1.1.3 Site and Proposed Development

The Site, as shown on Figure 1.2 lies within the red line boundary for the consented development.



Figure 1.2: Site Location Plan



The Proposed Development will comprise the following elements:

- Construction of a Primary Road from the Left-In, Left-Out junction with the A264 to Bush Lane (Bridleway 1585). The road will have a 6.4m wide carriageway;
- Two four-arm roundabouts are proposed on the Primary Road, as well as two priority ghost island junctions and four bellmouth junctions;
- Footpaths and cycleways designed in line with the approved site-wide cycling strategy, and provision for public transport;
- Foul and surface water drainage, including a SuDS basin and foul water pumping station, designed to be compliant with the appropriate design standards to enable adoption by West Sussex County Council and Southern Water, or a NAV company (new appointments and variations) as appropriate;
- Landscaping in the form of tree planting is proposed on both sides of the primary road, between the footways and the carriageway;
- A substation is proposed on the east side of the primary road; and
- Associated Infrastructure.

The Proposed Development has been designed to fall within the parameters previously assessed by the 2016 ES and 2017 ES Addendum, with minor amendments, summarised below:

- Re-alignment and straightening of the Primary Road from the road shown on the Land Use Parameter Plan of the consented development;
- Revised shape and location of the SuDS basin; and
- Realignment of footpath to follow the Public Right of Way (PRoW).

Given the scale of these amendments, they are considered to be non-material, and in accordance with the parameters previously assessed.

The application will be supported by application drawings, including a Block / Site Plan, Access Plans, Landscape Plans, and elevations for the foul pumping stations and substations if required.

1.1.4 Legislation, Policy, and Guidance

There have been publications and changes to legislation, policy and guidance documents since the submission of the 2016 ES. Consideration of these changes and the relevance to the topics scoped into the 2016 ES and 2017 ES Addendum is set out below.

National

The Town and Country Planning Act (TCPA) (Environmental Impact Assessment) Regulations 2017

The 2016 ES and 2017 ES Addendum were prepared against the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 EIA. These regulations have been superseded by the 2017 EIA Regulations and make provision for:

- Any demolition required in connection with development;
- An estimate of the quantity and type of waste produced during construction and in operation;
- A description of likely significant effects on human health; the impact on the climate from greenhouse gas emissions (energy demand);
- Consideration of the vulnerability of the project to the effects of climate change (adaptation); and
- Consideration of vulnerability/risks due to major accidents or disasters that are relevant to the development.

The Environment Act (2021)

The Environment Act came into effect in 2021 and is UK legislation that aims to improve air and water quality, protect wildlife, increase recycling, and reduce waste. It introduced a requirement for TCPA projects to achieve 10% biodiversity net gain (BNG).



National Planning Policy Framework (2024)

The 2016 ES and 2017 ES Addendum were prepared against the NPPF published in March 2012. The NPPF has subsequently been revised, and the current adopted version was published in December 2024 and updated in February 2025. Updated policies that are relevant in determining the likely significant effects of the changes will be included within the ES.

Local

The 2016 ES and 2017 ES Addendum were prepared against the Horsham District Planning Framework (HDPF) (Adopted November 2015). The Planning Inspector for the HDPF stated in the Initial Findings on the 19th December 2015 that the Land North of Horsham strategic allocation for a site to accommodate at least 2,500 homes is 'sound' (paragraph 20). The HDPF remains the adopted local plan for Horsham and the allocation remains adopted.

The Horsham District Local Plan 2023-2040 was published in January 2024 as the main planning document for Horsham District. The plan is currently at the Examination stage following the Regulation 19 stage and is being reviewed by the Planning Inspector, who has requested HDC to withdraw the plan.

Additionally, the Site is identified as being located within a Minerals Safeguarding Area, which was designated through the West Sussex Joint Minerals Local Plan 2018, and after outline planning consent had been obtained.

Other

Other policies and guidance that have come into effect since the submission of the 2017 ES Addendum that will be considered include:

- Department for Transport Circular (2022);
- Planning Practice Guidance – Noise (2019);
- Planning Practice Guidance – Biodiversity Net Gain (2025);
- Planning Practice Guidance – Air Quality (2019);
- Environment Agency, Land Contamination Risk Management (2020);
- Updated Environment Agency guidance in line with the updates to the Flood Risk Map for Planning;
- Environment Agency, Land Contamination Risk Management (2020);
- HDC Strategic Flood Risk Assessment Level 1 (2020);
- HDC Strategic Flood Risk Assessment Level 1 Update (2024).

Whilst the above legislative, policy and guidance documents have been brought forward we would not consider them likely to materially affect the significance of effect for findings that were previously identified in the 2016 ES or the 2017 ES Addendum for the relevant technical topics.



2 Review against the 2016 ES and 2017 ES Addendum

This section outlines the proposed scope of the ES for the Proposed Development and addresses the validity of the baseline data used for the 2016 ES, and where relevant the 2017 ES Addendum, the validity of the identified mitigation for the elements of the Proposed Development, and assessment of whether the residual effects previously assessed for each technical topic would be altered by the changes to the Proposed Development.

2.1.1 Chapter 8 Socio-Economics

2.1.1.1 Relevance and Scale of the Proposed Variations

The Proposed Development will not introduce any new dwellings or community facilities and would not substantially change the OPA consented development.

2.1.1.2 Baseline Data Validity

It is acknowledged that the socio-economic baseline may have changed since submission of the 2017 ES Addendum in terms of changes to the characteristics of the population, economy and infrastructure including schools and healthcare facilities. However, given the nature of the Proposed Development as a road, the updated baseline is not likely to be relevant to the assessment conclusions.

2.1.1.3 Validity of the Previous ES Findings and Identified Mitigation Measures

The Socio-economics chapter reported residual major beneficial effects during construction from the impact on job creation. For operation, major beneficial effects were concluded as a result of employment creation and contribution to meeting the housing requirement and need. Given that the effects identified were positive, no additional mitigation to that which is embedded within the consented development (i.e. the provision of two two-form entry primary schools, land for a secondary school, a local centre including health provision, and public space) was required.

No additional mitigation is therefore identified as being required for the Proposed Development. However, if development of the road did not come forward as originally intended, the beneficial effects of the employment creation from leisure services may not be fully realised, given the importance of the road for the accessibility of the Sports Hub, the A264, and into Horsham.

2.1.1.4 Conclusion

Since the baseline conditions at the Site remain valid; no new relevant legislative or policy changes have come forward; and the Proposed Development does not result in any significant change to the impact on socio-economic receptors; it is considered that the findings of the 2017 ES Addendum remain valid. **Therefore, it is proposed that socio-economics is scoped out of the ES.**



2.1.2 Chapter 9 – Contamination and Remediation

2.1.2.1 Relevance and Scale of the Proposed Variations

The Proposed Development would not introduce any new sources of contamination to the Site. Chapter 9 was informed by a Contaminated Land Desk Study in February 2016, with the expectation that ground investigation will be conducted to ascertain the actual chemical and geotechnical conditions within the Site. The Site comprises farmland, meadowland, managed woodland, and a small number of commercial / residential properties. Since the submission of the OPA, the Site is now located within a Minerals Safeguarding Area.

2.1.2.2 Baseline Data Validity

This baseline is expected to have changed since the 2017 ES Addendum by virtue of parts of the wider outline Site being cleared for construction. However, no contaminative land uses have been introduced within the Site since the submission of the 2017 ES Addendum, and any construction activities with the potential to have introduced contamination would be managed in line with the CEMP.

2.1.2.3 Validity of the Previous ES Findings and Identified Mitigation Measures

The 2016 ES concludes that contamination and remediation effects would be negligible across the construction phase. The impacts will be controlled through a CEMP which will detail how the effects of proposed works and waste will be managed, and where necessary, mitigated. If required, a Materials Management Plan will be provided in accordance with CL:AIRE¹ 'The Definition of Waste: Development Industry Code of Practice 2011'. Any localised remediation will be verified to prove that it has been successful.

During the operational phase, moderate beneficial effects were anticipated for the consented development for the remediation of contaminated soil and groundwater, and the introduction of residential land use which would reduce the probability of contamination.

2.1.2.4 Conclusion

Since the baseline conditions at the Site have been appropriately managed in accordance with the conditioned mitigation measures; and the Proposed Development will not impede the undertaking or warrant changes of the proposed site investigation, or the subsequent implementation of measures as outlined in the remediation strategy to mitigate the effects of identified contamination, it is therefore considered that the Proposed Development will not result in significant changes to those reported within the 2017 ES Addendum. A Land Contamination Assessment is proposed to be submitted with the full application. **Therefore, it is proposed that contamination and remediation is scoped out of the ES.**

¹ CL:AIRE is a UK charity committed to providing a valuable service for all those involved in sustainable land reuse.



2.1.3 Chapter 10 Agricultural Land

2.1.3.1 Relevance and Scale of the Proposed Variations

The Proposed Development does not increase the land take of the initially assessed red line boundary for the OPA.

2.1.3.2 Baseline Data Validity

The assessment of agricultural land in the 2016 ES was based on an Agricultural Land Classification (ALC) Survey for the site of the consented development, concluding that it extends to 249.6ha of predominantly agricultural land of which most is in arable production. Given that large parts of the site for the consented development have been cleared for construction, it is unlikely that it will have become higher quality agricultural land in this interim period. Agricultural activities ceased in late 2024.

2.1.3.3 Validity of the Previous ES Findings and Identified Mitigation Measures

The 2016 ES / 2017 ES Addendum concluded moderate adverse effects on the direct loss of agricultural land 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.

Moderate residual adverse effects to the loss of soil resource would occur during the construction phase, which would be mitigated through re-use of the surplus soil on-site in line with Defra's 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites'.

2.1.3.4 Conclusion

The chapter identifies that further measures will be set out within a Soil Resources Plan. Preparation of a Soil Resources Plan has been discharged for Phase 1 and is assumed to be underway. It is considered that, preparation of a Soil Resources Plan could be conditioned for the full application for the Proposed Development for the management of soil resources. However, given the Proposed Development is a road, with a site area of 6.54 hectares (ha), the impacts on the loss of agricultural land and soil resources are not anticipated to be as extensive as those assessed for the wider outline application.

The road, in isolation is unlikely to lead to the loss of soil resource or agricultural land. Given the surrounding land use will become residential, it is unlikely that the land within the Site would be used for agricultural purposes. **Therefore, it is proposed that agricultural land is scoped out of the assessment.**

2.1.4 Chapter 11 - Landscape and Visual

2.1.4.1 Relevance and Scale of the Proposed Variations

As full application for a road, the Proposed Development is likely to be low-lying within the landscape, compared to the consented development of 2,750 dwellings which it would provide access to. The Proposed Development lies within the red line boundary previously assessed for the consented



development. The Proposed Development further includes landscaping and a SuDS strategy in line with the principles of mitigation established by the 2017 ES Addendum.

2.1.4.2 Baseline Data Validity

It is acknowledged that the baseline environment may have changed since the submission of the 2017 ES Addendum as a result of other development and proposals coming forward, including the construction of the Reserved Matters applications following from the OPA permission across the rest of the site of the consented application. It is considered unlikely that there will have been significant changes to the landscape character, other than the potential impacts of the commencement of construction works across the outline Site and associated vegetation clearance, which would have been managed in line with the CEMP. Furthermore, any developments coming forward at the time of writing of the 2017 ES Addendum were considered within the cumulative assessment undertaken at that time, and developments which have come forward since then would be required to consider the consented development cumulatively.

2.1.4.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Chapter 11 reports that the construction phase of the consented development would result in residual minor adverse landscape effects, subsequent to the implementation of mitigation in the form of the siting of material stockpiles away from sensitive receptors and minimising the length of construction time for scaffolding and cranes. During construction, about half of the visual effects are predicted to be moderate adverse or lesser effects and are not significant. It is proposed that a CEMP could be conditioned to mitigate the impacts of construction on landscape and visual receptors for the Proposed Development.

For the operational phase, Chapter 11 reports that the Proposed Development will have a limited or no direct effect on other receptors and character areas within the wider landscape character areas / designation, with effects confined to the small enclosed area in the vicinity of the site, and that, following the maturing of landscaping proposals and increased tree cover / screening, the majority of effects to the landscape would be beneficial or not significant.

Mitigation of potential landscape and visual effects for the consented development comprised the landscape / ecology strategy and proposals for public open space embedded within the outline application, including the retention of existing boundary trees, shrubs, and woodland areas, new planting of hedgerows, enhancements to existing, and creation of new wildlife habitats, and creation of multifunctional greenspace. Along the southern edge of the site, a structural landscape buffer is intended to provide physical and visual separation from the A264.

2.1.4.4 Conclusion

The Proposed Development, in itself, is unlikely to be associated with significant landscape effects given the extent of the development. In combination with the outline application, it is likely that the Proposed Development would lead to the same significance of effect as reported in the 2017 ES Addendum. No additional mitigation was identified by Chapter 11 in addition to that which is embedded into the layout and design of the consented development, which the application for the road will be in accordance with, as set out in Section 3. **Therefore, it is proposed that landscape and visual is scoped out of the assessment.**



2.1.5 Chapter 12 - Ecology

2.1.5.1 Relevance and Scale of the Proposed Variations

The Proposed Development will not result in a change to the land take or ecological and landscape mitigation measures as defined for the consented development, or result in changes that will cause greater ecological harm than that assessed within the 2016 ES and 2017 ES Addendum. For these reasons, there will be no changes to the reported impacts to ecological receptors.

2.1.5.2 Baseline Data Validity

It is acknowledged that the ecological baseline may have changed over the passage of time since the submission of the 2017 ES Addendum. It is noted however, that at the Site, development has commenced and is partially complete and has been managed in line with the requirements as set out within the consent, as per the approved CEMP and EMMP. Updated and on-going surveys in 2025 appear to confirm that the ecological receptors within the Site have not changed significantly since the 2017 submission. The outcomes of these surveys will be summarised within the ES. It is therefore considered that any changes to the on-site ecology have been managed in line with best practice and the required mitigation measures as set out in the 2017 ES Addendum.

2.1.5.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Table 12.3 of Chapter 12 concludes that the residual construction and operational effects of the consented development will not be significant for designated sites, including: international statutory sites, Buchan Hill Ponds SSSI, Brookhurst Wood & Gill & Morris's Wood SNCI, ancient woodland, Warnham LNR. Effects would also not be significant for bats, hazel dormouse, great crested newt, waterbodies, reptiles, hedgerow/trees, gills, woodland, badgers, invertebrates, and birds, although there would be a negative impact on farmland birds.

For construction, mitigation would comprise a CEMP which would limit any potential pollution and siltation impacts on the Chennells Brook and other watercourses.

The design of the consented development was informed by ecological input, and therefore the layout respects ancient woodland, the SNCI, and waterbodies through buffers and the design of access routes. The proposals for enhancements to habitats are to be supported by an ecological mitigation management plan (EMMP), including management of enhancements to connect features within the Site to the wider Green Infrastructure.

The Proposed Development will not result in a change to the land take or ecological and landscape measures as defined for the Consented Development or result in changes that will cause greater ecological harm. For these reasons, there will be no changes to the reported impacts to ecological receptors.

The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 commits biodiversity net gain (BNG) for most types of new planning applications. A BNG assessment will be undertaken and will support the full planning application.



2.1.5.4 Conclusion

The full application for the Proposed Development, in itself, is unlikely to be associated with significant ecological effects given that the 2017 ES concludes that the residual and operational effects of the consented development would not be significant. The Proposed Development will be supported by a BNG Metric, Tree Survey, and Arboricultural Impact Assessment. **Therefore, it is proposed that ecology is scoped out of the assessment.**

2.1.6 Chapter 13 - Archaeology and Heritage

2.1.6.1 Relevance and Scale of Proposed Variations

The Proposed Development will not result in a change to the land take for the consented development or result in changes that will cause greater archaeological harm. For these reasons, there will be no change to the reported impacts to archaeological receptors.

2.1.6.2 Baseline Data Validity

The archaeology and heritage baseline is unlikely to have changed across the Site since the 2017 ES Addendum. A first phase of evaluation fieldwork was undertaken pre-2017 through geophysical survey which identified areas of archaeological potential to be investigated post-determination by conditioned archaeological work. The implementation of condition 22 of the outline application has begun across the Site, which relates to archaeology and evaluation trenching.

It is noted that the Site has been subject to remediation works and has been managed in line with the requirements as set out within the consent, as per the approved CEMP. It is therefore considered that any works undertaken on-site have been managed in line with best practice and the required mitigation measures as set out in the 2017 ES Addendum.

2.1.6.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Chapter 13 of the 2016 ES reports residual minor adverse effects to disturbance to buried archaeological deposits, which would be mitigated through an archaeological watching brief required during groundwork (including geotechnical investigations). As the archaeological investigation work progresses across the outline Site, as per Condition 22 of the outline application, it could be the case that archaeological remains are uncovered, and further mitigation could be required based on the evaluation results.

Moderate/minor adverse impacts are anticipated for disturbance to historic hedgerows, which would be mitigated through the archaeological watching brief. Breaches of historic hedgerows would be kept to a minimum, and all new breaches would require archaeological supervision with the exact scope of mitigation to be agreed through a Written Scheme of Investigation.

Moderate/minor adverse impacts are anticipated to the setting of listed buildings, for which the mitigation would be the embedded sensitive design to minimise the loss of the rural context. Potential impacts to the fabric of listed buildings through noise and vibration would be mitigated through ensuring these assets are surrounded by open space through detailed design.



2.1.6.4 Conclusion

Mitigation of impacts on above-ground designated heritage assets are embedded into the design of the consented development, which has begun to be built out. The conditioned programme of archaeological investigation is being progressed across the Site. It is considered that the proposed archaeological mitigation, such as watching briefs would be re-conditioned for the full application if necessary, and that the requirements for any additional mitigation which may arise through the current programme of investigation will be carried into the full application if known prior to submission. A Heritage Statement will be submitted with the application. **Therefore, it is proposed that archaeology and heritage is scoped out of the assessment.**

2.1.7 Chapter 14 - Transport and Access

2.1.7.1 Relevance and Scale of Proposed Variations

The Proposed Development slightly alters the location of the road from what was previously assessed in the 2016 ES / 2017 ES Addendum. However, the principles and parameters of the road remain consistent with those agreed through the OPA, and the proposed layout has been agreed with West Sussex County Council during pre-application discussions. The Proposed Development would make provision for public transport, and pedestrians, and cyclists, in accordance with the approved site-wide cycling strategy. An independent Stage 1 Road Safety Audit of the proposed highway has been carried out, which has not identified any safety concerns.

2.1.7.2 Baseline Data Validity

It is acknowledged that the transportation baseline may have changed over the passage of time since the 2017 ES Addendum. It is noted however, that development has commenced for phases of the consented development and has been managed in line with the approved CEMPs. It is therefore considered that any changes to transport have been managed in line with best practice and the required mitigation measures as set out within the 2016 ES and 2017 ES Addendum.

2.1.7.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Chapter 14 identified the following residual effects during the construction phase:

- Minor adverse effects to pedestrian and cyclist delay and amenity within the Site; and
- Moderate adverse effects to driver delay to the A264 south of the Site.

For the operational phase, Chapter 14 identified the following residual effects:

- Major beneficial effects to severance at the A264 south of the site;
- Minor adverse effect to severance at Rusper Road;
- Major beneficial effect to severance at Langhurst-wood Road; and
- Minor beneficial effect to pedestrian and cyclist delay and amenity within the Site.

Mitigation for these effects were embedded into the design of the Proposed Development.



2.1.7.4 Conclusion

Given the nature of the application, it is considered that further detail will be provided within the ES to confirm whether there would be material impacts from the Proposed Development on the assessment of the 2017 ES Addendum in relation to traffic and transport.

2.1.8 Chapter 15 - Air Quality

Chapter 15 – Air Quality assessed the potential impacts of the consented development on air quality receptors and was authored by Peter Brett Associates. This chapter was not updated in the 2017 ES Addendum.

2.1.8.1 Relevance and Scale of Proposed Variations

The Proposed Development does not propose new dwellings or facilities which would generate operational road traffic, and it is anticipated that it would largely be accommodating the traffic generated from the consented development. There is no material alteration to the road layout. Therefore, it is not anticipated that the Proposed Development would be of a scale to change the previously reported air quality effects.

2.1.8.2 Baseline Data Validity

The baseline for Chapter 15 was established through obtaining information on existing air quality in Horsham.

2.1.8.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Chapter 15 concludes that effects on human health receptors from emissions from construction and operational road traffic are negligible and not significant subsequent to the implementation of a CEMP which would ensure that machinery and dust causing activities are located as far from sensitive receptors as possible.

During operation, effects from traffic generated by new dwellings would be minimised through the layout of the consented development, which incorporates landscaping and buffering from transport routes, and would therefore result in negligible / not significant effects. Impacts to the woodland habitat within the Buchan Ponds SSSI are anticipated to be minor adverse close to the A2654 and A220 due changes in oxides in nitrogen concentrations. Elsewhere, impacts on woodland habitat would be negligible / not significant.

2.1.8.4 Conclusion

The outline scheme was not associated with any significant air quality effects and mitigation comprises that which is embedded within the layout of the consented development, and standard construction phase mitigation to be implemented through a CEMP.

The full application for the Proposed Development has been prepared in line with the layout previously assessed, and therefore the embedded mitigation of landscaping and buffering from transport routes would still apply. It is proposed that a CEMP will be provided with the full application and would provide



the relevant measures to manage construction dust and air quality effects. **Therefore, it is proposed that air quality is scoped out of the assessment.**

2.1.9 Chapter 16 - Noise and Vibration

Chapter 16 – Noise and Vibration assessed the potential impacts of the consented development on noise and vibration receptors and was authored by Peter Brett Associates. This chapter was not updated in the 2017 ES Addendum.

2.1.9.1 Relevance and Scale of the Proposed Variations

The Proposed Development would not result in alterations to the construction methodology of the consented development. The Proposed Development is not considered to result in an increase to operational traffic levels, as it does not introduce any new dwellings (i.e. noise sensitive receptors).

2.1.9.2 Baseline Data Validity

Chapter 16 assessed the existing and future noise from the proposed uses of the site, the effect of construction noise, and the vibrations to existing and proposed noise sensitive receptors to a methodology and study area agreed with HDC. The baseline data was established through an environmental noise study and a noise model to predict likely noise impact. It is likely that the baseline noise climate will have changed given the commencement of works within other phases of the consented development. However, no noise sensitive receptors are proposed.

2.1.9.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Chapter 16, Noise and Vibration reports minor to moderate adverse effects as a result of construction works, which would be mitigated through the implementation of measures in accordance with the CEMP, such as locating noisy plant away from existing dwellings and carrying out regular noise monitoring at sensitive receptors. It is proposed to provide a CEMP for the Proposed Development as a condition, which would ensure that noise from construction activities is mitigated through standard, best practice measures.

During operation, negligible (not significant) impacts were anticipated for the effects of road traffic noise on proposed residential, schools, and business parks, and existing residential receptors, subject to the sensitive master planning and setbacks of buildings from the A264, acoustic barriers, and shielded outdoor amenity areas. This embedded mitigation will come forwards as part of the OPA and additional mitigation for existing residential receptors was not identified as necessary for existing residential receptors. The design of the Proposed Development has not significantly changed from the layout assessed by the 2016 ES and 2017 ES Addendum.

2.1.9.4 Conclusions

Since the baseline conditions at the Site remain valid, no new legislative or policy changes have come forward, and the Proposed Development does not introduce material changes that could result in a greater number of vehicles on the road, it is considered that the findings of the 2016 ES and 2017 ES



Addendum remain valid. **Therefore, it is proposed that noise and vibration is scoped out of the assessment.**

2.1.10 Chapter 17 - Surface Water and Hydrology

Chapter 17 – Surface Water and Hydrology assessed the potential impacts of the consented development on flood risk and surface water drainage and was authored by Peter Brett Associates. This chapter was updated in the 2017 ES Addendum to address EA requests for further modelling and assessment of additional blockage scenarios where Chennells Brook passes under the A264.

2.1.10.1 Relevance and Scale of the Proposed Variations

The Proposed Development does not increase the land take of the consented development or result in changes that would result in greater harm in relation to hydrology and water supply. The Proposed Development does not introduce any built development to the floodplain and any built development or land raising is located entirely within Flood Zone 1. The Proposed Development includes foul and surface water drainage, including a SuDS basin and foul water pumping station.

2.1.10.2 Baseline Data Validity

The Chapter 17 baseline was established through detailed hydrological and hydraulic modelling which confirmed that the floodplain within the Site for Chennells Brook and its tributaries, is narrow and does not extend far from the watercourse. The majority of the Site of the consented development is at a 'very low' risk of flooding, and development is not proposed within the flood plain. In March 2025, the EA published updated Flood Zone mapping as part of the new National Flood Risk Assessment (NaFRA2) which includes information accounting for the potential effects of climate change. These updates have not significantly altered the reported baseline.

2.1.10.3 Validity of the Previous ES Findings and Identified Mitigation Measures

Given the embedded mitigation of the layout of the consented development avoiding areas of flood risk, Chapter 17 concluded that there would be negligible / not significant risk of flooding during construction or operation. Any effects to existing properties or on the A264 downstream of the outline Site was proposed to be mitigated through the implementation of a CEMP to avoid works within the floodplain, and the safe storage of plant and contaminants. It is proposed that a CEMP is conditioned for the Proposed Development, which will ensure the safe handling and storage of plants and contaminants to control potential impacts to water quality. Therefore, construction effects to water quality would not be significant for the Proposed Development.

The consented development's drainage scheme and attenuation system was proposed to limit the run-off rates and volumes to existing greenfield levels or lower, and included SuDS to treat rainwater. Where roads could result in reduced water quality, more treatment stages were proposed to be incorporated. Therefore, potential impacts were identified to be negligible / not significant.

The full application will be supported by a Detailed Surface and Foul Water Drainage Strategy developed in line with the principles of the drainage strategy of the outline application, and a Flood Risk Assessment.



A CEMP will also be provided which will ensure the safe handling and storage of plants and contaminants to control potential impacts to water quality. As set out in Section 1.1.3, the layout and design of the road application is not fundamentally different to the layout assessed for the outline application as to alter the conclusions on flood risk.

2.1.10.4 Conclusion

The full application for the road will be supported by a surface and foul drainage strategy in line with the drainage strategy for the outline application, and the mitigation of a CEMP will be re-applied to works for the full application. **Therefore, it is proposed that flood risk and hydrology is scoped out of the assessment.**

2.1.11 Additional Topics Scoped Out

The 2016 ES and 2017 ES Addendum were prepared against the 2011 EIA Regulations. The sections below consider the topics set out 2017 EIA Regulations in relation to the Proposed Development.

2.1.11.1 Major Accidents and Disasters

The 2017 EIA Regulations require a development to identify the potential significant effects arising from any vulnerability to major accidents or disasters. In the context of the EIA Regulations accidents and disasters could mean earthquakes, fire, or flooding among others.

The construction and operation of the proposed development comprises well understood processes that would be controlled by strict health and safety legislation and therefore there would be no expected accidents or disasters. For construction, the implementation of best practice measures through a CEMP would mitigate any risks of potential contaminants and procedures for safe materials handling and storage.

Flood risk was assessed within the 2017 ES Addendum, which concluded that the consented development avoids any development within the flood plain, and the site for the outline application is at negligible / not significant risk of flooding during construction and operation. This is discussed within Section 4.11 of this EIA Briefing Note.

2.1.11.2 Climate Change

It is acknowledged that climate change was not considered as a separate technical topic within the 2017 ES Addendum. However, it was addressed through various relevant standalone technical assessments and reports including the Design and Access Statement, Sustainability Statement, Energy Statement and the Waste Strategy. Since there are no material changes to the quantum or location of the Consented Development, it is not considered relevant to include climate change within the assessment.

Climate change resilience measures are embedded into the wider consented development. Examples of this include the proposals for a network of GI / habitat connectivity across the Site to contribute positively to local biodiversity, proposals for sustainable modes of travel, and consideration of the potential air quality effects from construction and operational traffic.

The CEMP would include measures which would address procedures for the risk of extreme weather events during construction.



As set out in Section 5.2, and Section 4.11, the potential vulnerability of the proposed development to flooding has been considered through the Chapter 17 of the 2017 ES Addendum, which concluded that there is negligible risk of flooding given that the layout is designed to avoid development within the floodplain.

Furthermore, it is considered that the Proposed Development will be constructed in accordance with current building regulations that aim to reduce carbon emissions. The 2025 UK Building Regulations, under the Future Homes Standard, aim to reduce carbon emissions from new homes by 75-80% compared to 2013 standards, focusing on energy efficiency and low-carbon heating.

2.1.11.3 Human Health

The 2017 EIA Regulations require a consideration of population and human health, including the potential impacts of a proposed development on human health and wellbeing. There is no prescribed methodology for the assessment of impacts on human health.

It is acknowledged that human health was not considered as a separate technical topic within the 2017 ES Addendum. However, it was addressed through other technical chapters such as Air Quality, Noise and Vibration, Socio-Economics, Contamination and Remediation and Transport and Access. Since there are no material changes to the quantum or location of the Consented Development, it is not considered relevant to include human health within the assessment.

Chapter 8 – Socio Economics of the 2016 ES considers the impacts of the consented development on the resident and working population, including on the provision of community facilities, particularly health care and recreational facilities used by future residents and employees. The baseline accounts for community services in the vicinity of the outline application Site, including Horsham Hospital which is within two miles, and Crawley Hospital, within five miles. The Socio Economics chapter also considers some of the wider determinants of health, such as deprivation.

The consented development includes proposals for a local centre which would include health provision and community space. Therefore, residual impacts on publicly funded health services were reported to be negligible in Chapter 8, and the impact on community service would be minor beneficial.

The wider determinants of human health have been considered through the assessments of air quality and noise and vibration effects within the 2016 ES. For the construction phase, Chapter 15 – Air Quality proposes mitigation through a CEMP to control the impacts of machinery and dust causing activities on sensitive receptors, which would limit effects to be not significant for human health receptors. Similarly, Chapter 16 – Noise and Vibration reports that the implementation of the CEMP would limit the impacts of noisy construction activities and machinery to moderate to minor adverse effects, depending on receptor locations.

During operation, air quality effects from road traffic were reported to be not significant due to the land use master planning, and noise and vibration effects were reported to be not significant in Chapter 16 based on the acoustics barriers, earth bunds, and setbacks incorporated into the layout.

2.1.12 Waste

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, it was addressed through various relevant standalone technical assessments and reports including the Sustainability Statement, and the Waste Strategy. Table 2-1 in the 2016 ES states that '*the use of natural resources; c. the emission of pollutants, the creation of nuisances and the elimination of waste,*' were considered within the assessment set out 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. Residential and non-residential 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, and this topic has been scoped out of the ES.

2.1.12.1 Cumulative Development

There are no changes to the land take, any exceedance of building heights or density, or alterations to the construction or operational methodology for the Consented Development. Therefore, it is considered that no amendment to the conclusions of the 2017 ES Addendum in terms of cumulative effects is required.

Any new relevant proposed developments submitted for planning approval since the original planning application was consented will have considered this development within its cumulative assessment as part of its planning approval process.

Since the baseline conditions at the Site remain valid, no new legislative or policy changes have come forward, and there are no material changes to the quantum or location of the Consented Development, it is not considered relevant to include cumulative effects within the assessment.



3 Conclusion

It is acknowledged that a full planning application requires to be supported by an ES. This Scoping Note provides informal EIA scoping and addresses the approach taken in considering whether technical topics are relevant for inclusion in an ES; in particular the extent to which chapters are needed due to changes in circumstances at the Site or the passage of time since the consented scheme was granted.

In considering the Proposed Development, this Scoping Note concludes that the baseline conditions at the Site remain valid, no new legislative or policy changes have come forward, and the Proposed Development does not introduce material changes that could result in a greater environmental effects for the majority of the technical environmental topics. It is considered that the findings of the 2016 ES and 2017 ES Addendum remain valid for all topics except Transport and Access, and this topic will require further assessment within an ES.

Given the legal obligation to provide an ES, it is proposed to prepare a Mini ES in compliance with the EIA Regulations. The Mini ES will append the 2016 ES and 2017 ES Addendum and will provide the following:

- Description the Proposed Development;
- Outline the reasonable alternatives considered;
- Description of the baseline environment, description the likely significant effects, description the measures to mitigate adverse effects and will provide reasoned judgement as to why the information reported within the 2016 ES and 2017 ES Addendum remains valid and can be relied upon to support the planning application for those topics scoped out of the ES.
- A non-technical summary.



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