



Employment Land Road, Mowbray

Environmental Statement

On behalf of **Legal & General (Strategic Land North Horsham) Ltd**

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For and on behalf of Stantec UK Limited			

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1 Preamble

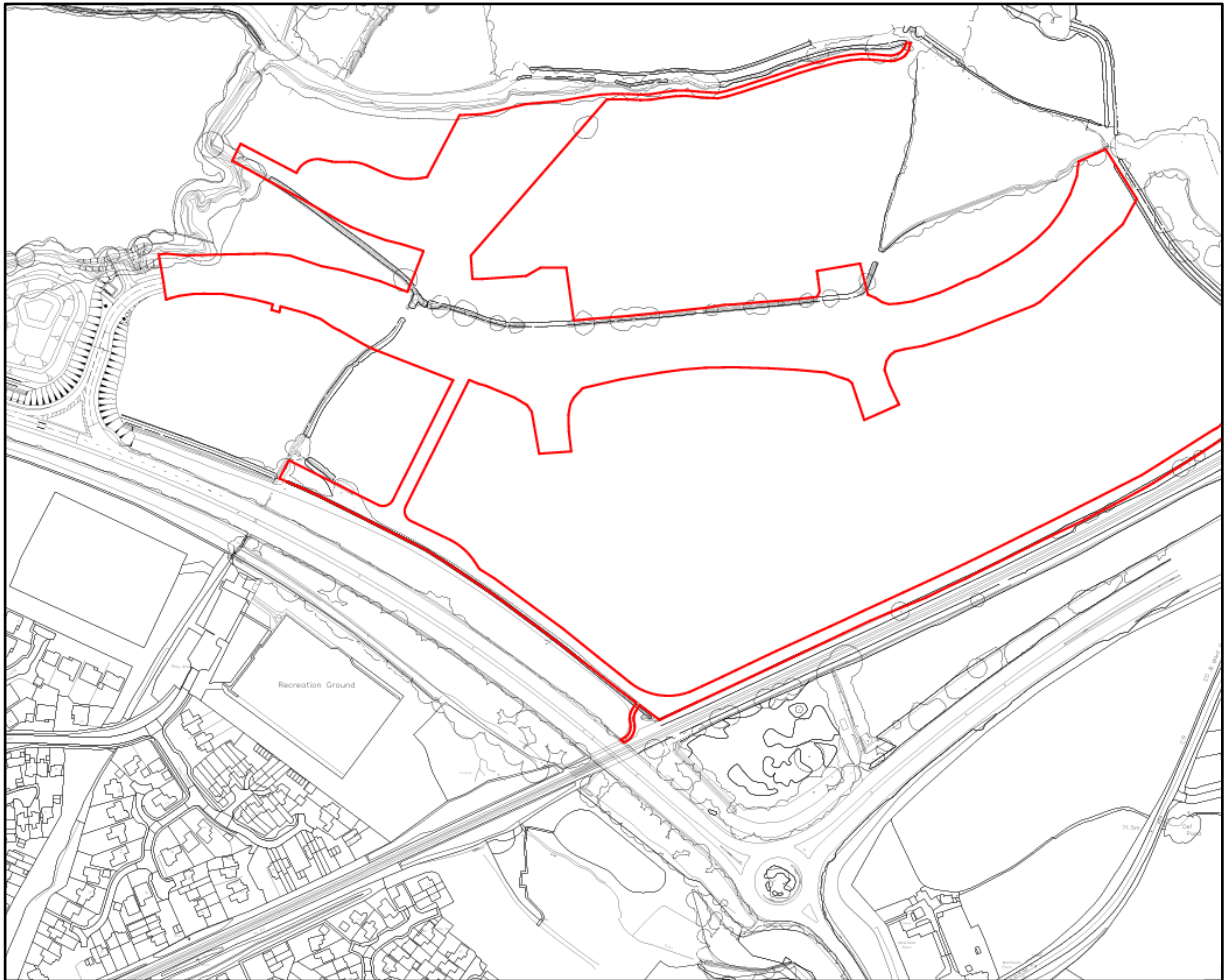
1.1 Introduction

1.1.1 This Environmental Statement (ES) has been prepared by Stantec on behalf of Legal & General (Strategic Land North Horsham) (the 'Applicant') in support of the full application for the following Proposed Development: *'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.'*

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

- 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 the responses received by 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 1.1 below.

Figure 1.1: Site Location Plan



1.2 Background and Need for this ES

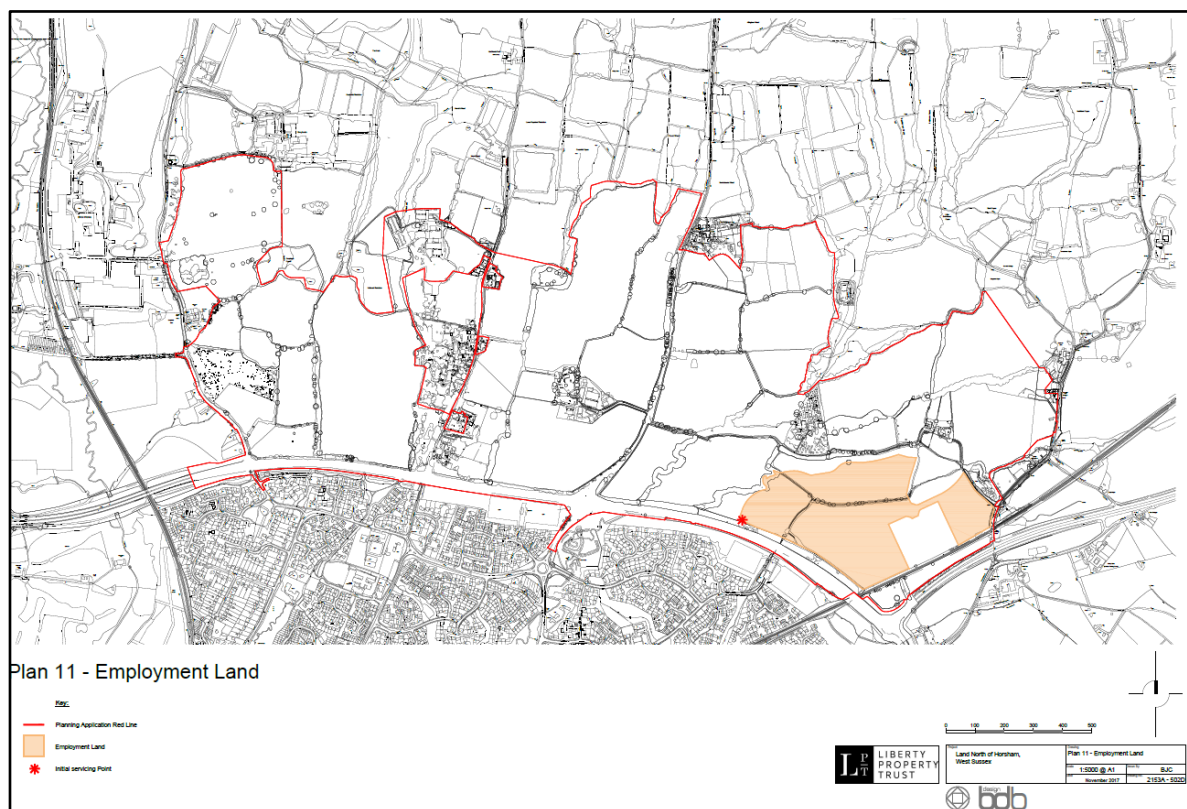
1.2.1 An ES was submitted in August 2016 to HDC (Ref: DC/16/1677) for a mixed use strategic development to include housing (up to 2,750 dwellings), business park (up to 46,450 m²), retail, community centre, leisure facilities, education facilities, public open space, landscaping and retail infrastructure.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

- 1.2.2 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.
- 1.2.3 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).
- 1.2.4 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 1.2: S106 Plan 11 – Employment Land



- 1.2.5 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.

Scope

- 1.2.6 This ES is required as the 2016 ES and 2017 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.

- 1.2.7 This ES sets out the approach we have taken to determine whether the Proposed Development would lead to material changes from the previous 2017 ES Addendum assessment of technical topics.

Site and Proposed Development

- 1.2.8 The red line boundary for the Proposed Development is shown on Figure 1.1. It falls within the red line boundary assessed for the outline application for the consented development.

- 1.2.9 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);
- Footpaths and cycleways;
- Foul and surface water drainage, including a SuDS basin and foul water pumping station;
- 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.

- 1.2.10 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).

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

- 1.2.12 The application is supported by the following plans:

- Block / Site Plan;
- Access / Highways Plans;
- Landscape Plans;
- Plans / elevations for foul pumping station and substation; and
- Landscape Plans.

- 1.2.13 The application is further supported by the following documents:

- Landscape design statement;
- Planning Statement;
- Tree Survey and Arboricultural Report;

- Biodiversity Survey and Report and BNG Metric;
- Draft Bird Hazard Management Plan;
- Landscape and Ecological Management Plan;
- Flood Risk Assessment;
- Detailed Surface & Foul Water Drainage Strategy;
- Road Safety Audit;
- Transport Statement;
- Lighting Assessment;
- Heritage Statement;
- Water Neutrality Strategy;
- Minerals Resource Assessment; and
- Desk Study Report and Ground Investigation Report.

Alternatives Considered

- 1.2.14 The construction of this section of the road is considered necessary to bring forward the other elements of the previously consented development, including the sports hub and development within Phase 2, and to facilitate access to the A264.
- 1.2.15 The road is located wholly within the Site as described in the 2017 Addendum. No additional alternatives than those considered within the 2017 ES Addendum are considered necessary.

ES Methodology

- 1.2.16 The methodology of this 2025 ES follows the approach to classifying the significance, sensitivity, and magnitude of effects as explained in Paragraph 3.4.10-11 and Table 3.2 of the 2017 ES Addendum and within the methodology section of each technical chapter.
- 1.2.17 The submitted 2017 ES Addendum has been reviewed by a suitably qualified professional against the Proposed Development and updated, as necessary, within this ES.
- 1.2.18 It should be noted that the Applicant is providing this ES voluntarily in the absence of an EIA Screening Opinion and Scoping Opinion for the Proposed Development.
- 1.2.19 Chapter 3 of this ES addresses the approach we have taken in considering whether the technical topics are relevant for inclusion in the ES; in particular the extent to which chapters are required due to changes in circumstances at the Site or the passage of time since the consented development was granted. In considering whether the Proposed Development represents material changes, the foremost consideration has been whether they have the potential to result in any new or materially different significant environmental effects for any specific technical topics. To inform this decision, 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 the 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.

1.2.20 Where it is considered against the above four criteria that no significant changes to the previously assessed significant effects would take place, the technical area has been scoped out of this ES and the residual effects from the 2017 ES Addendum remain.

1.3 Statement of Conformity and ES Scope

1.3.1 The 2017 ES Addendum has been reviewed to consider if the Proposed Development has the potential to either alter the assessment of likely significant effects on the environment or necessitate substantial additions or revisions to the published 2017 ES Addendum.

1.3.2 The conclusions submitted for the 2016 ES were unchanged within the 2017 ES Addendum. The significant effects identified are listed below:

- Socio-economics – Major Beneficial effects for the creation of employment in the construction phase, and Major Beneficial operational effects for contribution to housing requirement, contribution to local housing need, on job creation, on education, and on health provision.
- Contamination and Remediation – Moderate Beneficial operational effects for the remediation of contaminated soil and groundwater and the effect of residential end use.
- Agricultural Land – Moderate Adverse effects during the construction phase from the direct loss of subgrade 3a and 3b agricultural land, and Moderate / Minor construction effects from the loss of soil resources.
- Landscape and Visual – Moderate Beneficial Effects at Year 15 to landscape elements and landscape patterns / character of the site of the consented application, and minor to moderate beneficial effects to the West Sussex County Landscape Character Areas of the Northern Vales and Lower Weald Hills. Moderate adverse effects to half of the 75 visual receptor viewpoints at Year 1, although this was reduced by year 15, resulting in beneficial effects to the majority of viewpoints.
- Archaeology and Heritage – Minor / Moderate adverse construction phase effects to the disturbance of historic hedgerows, and Moderate / Minor adverse construction effects to the disturbance to the setting of listed buildings.
- Transport – Moderate Adverse construction phase effects to driver delay, but major beneficial operational phase effects to pedestrian and cyclist delay and amenity, severance of the A264 south of the Site, and severance of Langhurstwood Road.
- Noise and Vibration – Moderate Adverse effects to noise and vibration levels as a result of construction works.

- Ecology – Significant impact at the Site level for certain declining farmland birds (skylark, yellowhammer), although other declining bird species are likely to benefit (duncock, house sparrow, starling. Potentially positive Local level effects to invertebrates.

- 1.3.3 The ES should be read in conjunction with the Transport Statement and the 2017 ES Addendum **(Appendix 1.2)**.
- 1.3.4 Table 1.1 – ES Structure provides a summary of the review undertaken against the 2017 ES Addendum. Chapter 3 – Topics Scoped Out of the ES provides detail regarding the summarised conclusions in Table 1.1.

Table 1.1: ES Structure

2017 ES Addendum Chapters	Consideration within this ES	ES Chapter
-		Preamble
Chapter 1: Introduction (DMH Stallard)	Updated	Preamble - Chapter 1 – Section 1
Chapter 2: Background to EIA (DMH Stallard)	Review against 2017 ES Addendum -The Proposed Development to which this ES relates will not cause any material change to the EIA methodology as detailed in the 2017 ES Addendum.	Preamble - Chapter 1- Section 2
Chapter 3: Scope of this ES	The Proposed Development has been reviewed against the scope of the 2017 ES Addendum and the updated baseline and policy context.	Preamble - Chapter 1 – Section 2 and 3
Chapter 4: The Site Description and Chapter 5: Proposed Development (DMH Stallard)	The Proposed Development to which this ES relates will not cause any material change to the Proposed Development Description as detailed in the 2017 ES Addendum. The construction of this section of the road is considered necessary to bring forward the other elements of the previously consented development, including the sports hub and development within Phase 2, and to facilitate access to the A264. The road is located wholly within the Site as described in the 2017 Addendum.	Preamble - Chapter 1- Section 2
Chapter 6: Other Alternatives (DMH Stallard)	The Proposed Development to which this ES relates is located within the Site as described in the 2017 Addendum. The construction of this section of the road is considered necessary to bring forward the other elements of the previously consented development. Therefore no additional alternatives than those considered within the 2017 ES Addendum are considered necessary	Preamble - Chapter 1 – Section 2
Chapter 7: Planning Policy Context (DMH Stallard)	The Proposed Development to which this ES relates has been considered against the current planning policy context and 2017 EIA Regulations.	Chapter 2, Legislation, Policy and Guidance
Chapter 8: Socio-Economics (Wessex Economics Ltd)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 9: Contamination and Remediation (BAE Systems)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES

Chapter 10: Agricultural Land (Reading Agricultural)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 11: Landscape and Visual (David Williams Landscape Consultancy)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 12: Ecology (Bioscan)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 13: Archaeology and Heritage (Archaeology South East)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 14: Transport and Access (Peter Brett Associates)	Further detail is provided within this 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.	Chapter 4 Transport and Access
Chapter 15: Air Quality (Peter Brett Associates)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 16: Noise and Vibration (Peter Brett Associates)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 17: Surface Water and Hydrology (Peter Brett Associates)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 18: Cumulative Development (DMH Stallard)	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum or nature of the development.	Chapter 3 Topics scoped out of the ES
Chapter 19: Summary of Mitigation Measures	The Proposed Development to which this ES relates will not cause any material change to the conclusions drawn in the 2017 ES Addendum Chapter for this topic as the changes do not alter the quantum of nature of the development.	Chapter 5 Summary of Mitigation

and Residual Effects (DMH Stallard)		Measures and Residual Effects
Non-Technical Summary – Standalone document (DMH Stallard)	The Proposed Development to which this ES relates will not result in material changes to the content of the NTS. Additionally, the Proposed Development would not change the likely significant effects as reported in the 2017 ES Addendum, therefore the conclusions within the NTS remain unchanged. However, a revised NTS has been provided at page 4 of this ES to provide clarity to a non-technical reader on the process that has been undertaken, the proposed amends and that the Significant effect findings remain the same.	Standalone NTS
	New topics to be included in an ES includes, major accidents and disasters, climate, waste and human health.	Chapter 3 - Topics scoped out of the ES

2 Legislation, Policy, and Guidance

2.1 Overview

- 2.1.1 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.

2.2 National

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

- 2.2.1 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 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.
- 2.2.2 No demolition is proposed. Consideration of climate and human health impacts is provided within Section 3.

The Environment Act 2021

- 2.2.3 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 also introduced a requirement for development to provide a minimum 10% biodiversity net gain (BNG). A BNG metric and assessment is provided to support the Planning application, produced by Derek Finnie Associates.

National Planning Policy Framework (NPPF)

- 2.2.4 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.

2.3 Local

- 2.3.1 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.

- 2.3.2 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.
- 2.3.3 Additionally, the Site has been identified as being located within a Minerals Safeguarding Area, which was designated in 2018, and after outline planning consent had been obtained.

2.4 Other

Other policies and guidance that have come into effect since the submission of the 2017 ES Addendum that have been 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);
 - Horsham District Council Strategic Flood Risk Assessment Level 1 (2020); and
 - Horsham District Council Strategic Flood Risk Assessment Level 1 Update (2024).
- 2.4.1 Whilst the above legislative, policy, and guidance documents have been brought forward they are not considered to materially affect the significance of effect findings that were previously identified in the 2016 ES or the 2017 ES Addendum for the relevant technical topics.

3 Topics Scoped Out of the ES

- 3.1.1 This chapter 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 reported within the 2016 ES and 2017 ES Addendum for each technical topic would be altered by the Proposed Development.

3.2 Chapter 8 Socio-Economics

- 3.2.1 Chapter 8 of the 2016 ES and 2017 ES Addendum assessed the socio-economic impacts of the consented development and was undertaken by Wessex Economics Ltd. No updates were made to the chapter in the 2017 ES Addendum.

Relevance and Scale of the Proposed Variations

- 3.2.2 The Proposed Development will not introduce any new dwellings or community facilities and would not substantially change the Outline Planning Application (OPA) consented development.

Baseline Data Validity

- 3.2.3 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 capacity of community infrastructure including schools and healthcare facilities.
- 3.2.4 The Socio-Economics Chapter compared the baselines of the local level (the town of Horsham) and Horsham District, using 2001 and 2011 Census data, the annual population survey, Business Register and Employment Survey, Annual Survey of Hours and Earnings, and Employment Forecasts. The chapter drew on Office for National Statistics (ONS) projections for anticipated future baseline growth for 2031, the Experian May 2013 projections for future employment growth, and the housing requirement as set out in the HDPF. The assessment of the impact on health facilities and provision of early years and school facilities and community centres was based on baseline data collection in 2016.
- 3.2.5 Since 2017, the results of the 2021 ONS Census were published. The population of Horsham increased by 11.8% from 2011 to 146,800 in 2021 and the median age increased by one year to 45 years of age. The baseline of health facilities, early years / school provision, and community facilities provision is also likely to have changed. However, given the Proposed Development is a road, the updated baseline is not likely to be relevant to the assessment conclusions as no additional dwellings or employment uses are proposed.

Validity of the Previous ES Findings and Identified Mitigation Measures

- 3.2.6 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 (through B Class development and job creation in local private retail and leisure services) and contribution to meeting the housing requirement and need. The 2017 ES Addendum did not change these conditions.
- 3.2.7 Given that the effects identified were positive, no additional mitigation to that which is embedded within the 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.
- 3.2.8 The full application for the road would not require any additional mitigation to that identified in the 2017 ES Addendum Chapter 8 – Socio-Economics, as no dwellings or employment uses

are proposed. 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.

Conclusion

- 3.2.9 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.
- 3.2.10 Significant residual effects reported within the 2017 ES Addendum are Major Beneficial effects for the creation of employment in the construction phase, and Major Beneficial operational effects for contribution to housing requirement, contribution to local housing need, on job creation, on education, and on health provision.

3.3 Chapter 9 Contamination and Remediation

- 3.3.1 Chapter 9 of the 2016 ES assessed the impacts of the consented development on geology, soils, and groundwater, with respect to contamination and remediation, and was undertaken by BAE Systems. No further updates to the chapter were made in the 2017 ES Addendum.

Relevance and Scale of Proposed Variations

- 3.3.2 The Proposed Development would not introduce any new sources of contamination. The baseline assessment of the Contamination and Remediation 2016 ES chapter was based on a Contaminated Land Desk Study in February 2016, with the expectation that ground investigation would be conducted to ascertain the actual chemical and geotechnical conditions within the Site. The consented development site comprises farmland, meadowland, managed woodland, and a small number of commercial / residential properties. Since the submission of the OPA, the Site is now included within a Minerals Safeguarding Area.

Baseline Data Validity

- 3.3.3 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.

Validity of the Previous ES findings and Validity of Mitigation Measures

- 3.3.4 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:AIRE 'The Definition of Waste: Development Industry Code of Practice 2011'. Any localised remediation will be verified to prove that it has been successful.
- 3.3.5 During the operational phase, moderate beneficial effects are 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.

Conclusion

- 3.3.6 Since the baseline conditions at the Site have been appropriately managed in accordance with the conditioned mitigation measures; no new relevant legislative or policy changes have come forward; 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.

- 3.3.7 Significant residual effects reported within the 2017 ES Addendum are Moderate Beneficial effects from the remediation works, in relation to any contaminated soil and also to groundwater.

3.4 Chapter 10 Agricultural Land

- 3.4.1 Chapter 10 of the 2016 ES assessed the potential effects of the consented development on agricultural land. The assessment was conducted by Reading Agricultural. No updates to Chapter 10 were made in the 2017 ES Addendum.

Relevance and Scale of Proposed Variations

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

Baseline Data Validity

- 3.4.3 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. Agricultural activities ceased in late 2024 and 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.

Validity of the Previous ES findings and Identified Mitigation Measures

- 3.4.4 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.
- 3.4.5 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'.
- 3.4.6 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, if necessary, 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 application is for a road in isolation and the site area is 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.

Conclusion

- 3.4.7 The road, in isolation is unlikely to lead to the loss of soil resource or agricultural land. As the Site is under 20ha of BMV, it would not trigger the need to consult Natural England on the loss of best and most versatile 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.

- 3.4.8 Significant residual effects reported within the 2017 ES Addendum are Moderate Adverse effects during the construction phase from the direct loss of subgrade 3a and 3b agricultural land, and Moderate / Minor construction effects from the loss of soil resources.

3.5 Chapter 11 Landscape and Visual

- 3.5.1 Chapter 11 of the 2016 ES assessed the potential landscape and visual impacts of the consented development and was authored by David Williams Landscape Consultancy. Minor updates were made to the chapter in the 2017 ES Addendum to address consultation responses in relation to ancient woodland, hedgerows, and trees.

Relevance and Scale of Proposed Variations

- 3.5.2 As a 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 and would not result in any exceedances to building heights or densities and further includes landscaping and a Sustainable Drainage System (SuDS) strategy in line with the principles of mitigation established in the 2017 ES Addendum.
- 3.5.3 The 'Employment Road Landscape Statement' produced by David Jarvis Associates Ltd provides an overview of the landscape design of the Proposed Development. The Statement sets out that the Proposed Development will retain existing vegetation along field boundaries and watercourses. Landscape features such as attenuation basins, tree, and shrub planting will 'create a soft naturalistic aspect' to the Proposed Development. The landscape scheme will be implemented in the first planting season following the construction of the road. A Landscape and Ecological Management Plan has further been developed by David Jarvis Associates Ltd and Derek Finnie Associates to set aims and objectives for the management of the existing and proposed features on the Site to ensure the long-term viability of the habitat creation.
- 3.5.4 As set out in paragraph 4.11 of the Landscape Statement, some vegetation clearance is required along the line of the road, for the drainage infrastructure, and along the line of the PRow connection to the south.

Baseline Data Validity

- 3.5.5 Chapter 11 was based on baseline landscape and visual appraisal following desktop studies and field surveys in June 2011 and site visits in March 2014, September 2014, September 2015, and a photographic record. Chapter 11 notes that the surrounding landscape is primarily open farmland subdivided by field hedgerows, lines of mature trees, and woodland blocks, with strong belts of trees adjoining the A264 and built-up areas of north Horsham to the south. The Site of the outline application is crossed by a number of Public Rights of Way (PRow), public footpaths and bridleways.
- 3.5.6 The Study Area was the theoretical 'Zone of Visual Influence' of the development (i.e. the area the development may be visible from), which was contained and restricted by the built-up areas of Horsham and the A264 to the south. The chapter was accompanied by photomontages, and viewpoints from specified locations.
- 3.5.7 The assessment of landscape character was based on published local landscape guidance, including the West Sussex Landscape Character Areas, the Landscape Strategy and the Land Management Guidance, and the West Sussex Historic Landscape Characterisation, as well as taking into account any change to the Horsham District Landscape Character Areas in the HDC Landscape Character Assessment (2003), and the impact on specific landscape features. Horsham have not published an updated Landscape Character Assessment since 2017.
- 3.5.8 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.

Validity of the Previous ES Findings and Recommended Mitigation Measures

- 3.5.9 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 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. The chapter reports major adverse visual effects for Leaside Cottage, and Morris Farm, and substantial adverse visual effects for Moated House Farm, King's Farmhouse and Hollywick Farmhouse. These residential receptors are not located in proximity to the proposed road, and, given the form of the surrounding future residential land use, it is not anticipated that the road, which would be low-lying in the landscape, would lead to significant effects in isolation.
- 3.5.10 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.
- 3.5.11 Two residential properties (Leaside Cottage and Morris Farm) will continue to experience moderate adverse visual effects due to the close proximity of the northern link road to these properties and limited space available to provide appropriate screening or softening of the views. These receptors are not located in proximity to the Proposed Development.
- 3.5.12 Mitigation of potential landscape and visual effects would comprise 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. The Proposed Development would not impact on the maturation or maintenance of the landscaping proposals of the outline application and includes landscaping and a SuDS strategy in line with the principles of mitigation established by the 2017 ES Addendum.

Summary

- 3.5.13 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 in the layout and design of the consented development, which the application for the road will be in accordance with, as set out in Section 2.
- 3.5.14 Significant residual effects reported within the 2017 ES Addendum are Moderate Beneficial Effects at Year 15 to landscape elements and landscape patterns / character of the site of the consented application, and minor to moderate beneficial effects to the West Sussex County Landscape Character Areas of the Northern Vales and Lower Weald Hills. Moderate adverse effects to half of the 75 visual receptor viewpoints at Year 1, although this was reduced by year 15, resulting in beneficial effects to the majority of viewpoints.

3.6 Chapter 12 Ecology

- 3.6.1 Chapter 12 – Ecology assessed the potential impacts of the consented development on ecological receptors and was authored by Bioscan. This chapter was updated in the 2017 ES Addendum primarily to include the results of invertebrate surveys and bat emergence / re-entry surveys, and a badger survey.

Relevance and Scale of Proposed Variations

- 3.6.2 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 are not considered to be any changes to the reported impacts to ecological receptors.

Baseline Data Validity

- 3.6.3 The assessment baseline was informed by a desk study, ecological field surveys undertaken in 2010 and 2011, and 2016 to inform the 2017 ES Addendum comprising habitat surveys, great crested newts, reptiles, bats, hazel dormouse, water vole and otter, bird, and badger. The key ecological receptors were identified from this baseline information.
- 3.6.4 The study area was dominated by agricultural fields bounded to the south by the A264; however agricultural activities ceased in late 2024, with fields not displaying a mixture of former self-seeded crops and rank grasses. No part of the Site of the outline application is subject to any statutory nature conservation designation. Warnham Site of Special Scientific Interest (SSSI) is located 0.3km to the north-west of the outline Site. Warnhill Mill Pond Local Nature Reserve (LNR) is located 0.45km south-west. Brookhurst Wood & Gill & Morris's Wood is a Site of Nature Conservation Importance (SNCI) located within the Site.
- 3.6.5 It is acknowledged that the ecological baseline may have changed over the passage of time since the submission of the 2017 ES Addendum. However, updated and on-going surveys in 2025 appear to confirm the ecological receptors within the Site have not changed significantly since the 2017 ES Addendum.
- 3.6.6 The construction of the wider consented application has commenced and has been managed in line with the requirements as set out within the consent, as per the CEMP and Ecological Mitigation and Management Plans (EMMPs), incorporating the most up to date ecological surveys for that part of the outline site. It is therefore considered that any changes to the baseline of the wider Site for the consented application have been managed in line with best practice and the required mitigation measures as set out in the 2017 ES Addendum.
- 3.6.7 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.
- 3.6.8 Environmental DNA analysis of the three waterbodies within 250m of the eastern end of the proposed road (referred to as P25, P29 and P1 in previous submissions) all returned negative results in 2025. P2 and P30, which lie within 200m to the north of the road, were shown to contain great crested newt population in 2024; however, both of these lie on the far side on Chennel's Brook, which will act as a barrier to newt movement. Furthermore, both ponds will be subject to mitigation scheme associated it the consented Bailey Road extension which would involve the removal of the newt population to a designated receptor site.
- 3.6.9 On-going reptile surveys in 2025 have not encountered any reptiles within the site, suggesting a continued absence of this species group.
- 3.6.10 Initial analysis of the bat data from static detectors deployed along the route of the road indicate that the bat assemblage within the Site has not changed significantly since the 2016

surveys, with common pipistrelle the most frequently encountered species, followed by soprano pipistrelle then noctule.

- 3.6.11 Breeding bird surveys in 2025 did not encounter yellowhammer, which have previously been recorded; this may be due to an alteration in the crop regime. Skylark and linnet were, however, still noted to be present.
- 3.6.12 An active badger clan is known to be located some 60m from the proposed construction area

Validity of the Previous ES Findings and Recommended Mitigation Measures

- 3.6.13 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.
- 3.6.14 For construction, mitigation would comprise a CEMP which would limit any potential pollution and siltation impacts on the Chennells Brook and other watercourses.
- 3.6.15 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 supported by Landscape and Ecological Management Plan (LEMP), including management of enhancements to connected features within the Site to the wider Green Infrastructure.
- 3.6.16 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 are not considered to be any changes to the reported impacts to ecological receptors.
- 3.6.17 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 has been undertaken and is provided in support of the full planning application.

Conclusions

- 3.6.18 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 are predominantly not significant.
- 3.6.19 The full application for the Proposed Development is supported by a BNG Metric and Assessment, and Tree Survey and Arboricultural Report (including an Arboricultural Impact Assessment and Method Statement).
- 3.6.20 Significant residual effects reported within the 2017 ES Addendum are significant impact at the Site level for certain declining farmland birds (skylark, yellowhammer), although other declining bird species are likely to benefit (dunnock, house sparrow, starling). Potentially positive Local level effects to invertebrates.

3.7 Chapter 13 – Archaeology and Heritage

- 3.7.1 Chapter 13 – Archaeology and Heritage assessed the potential impacts of the consented development on heritage and archaeological receptors, and was authored by Archaeology South East. This chapter was updated in the 2017 ES Addendum to address comments from Historic England regarding archaeological mitigation, the assessment of historic landscape character and cumulative assessment.

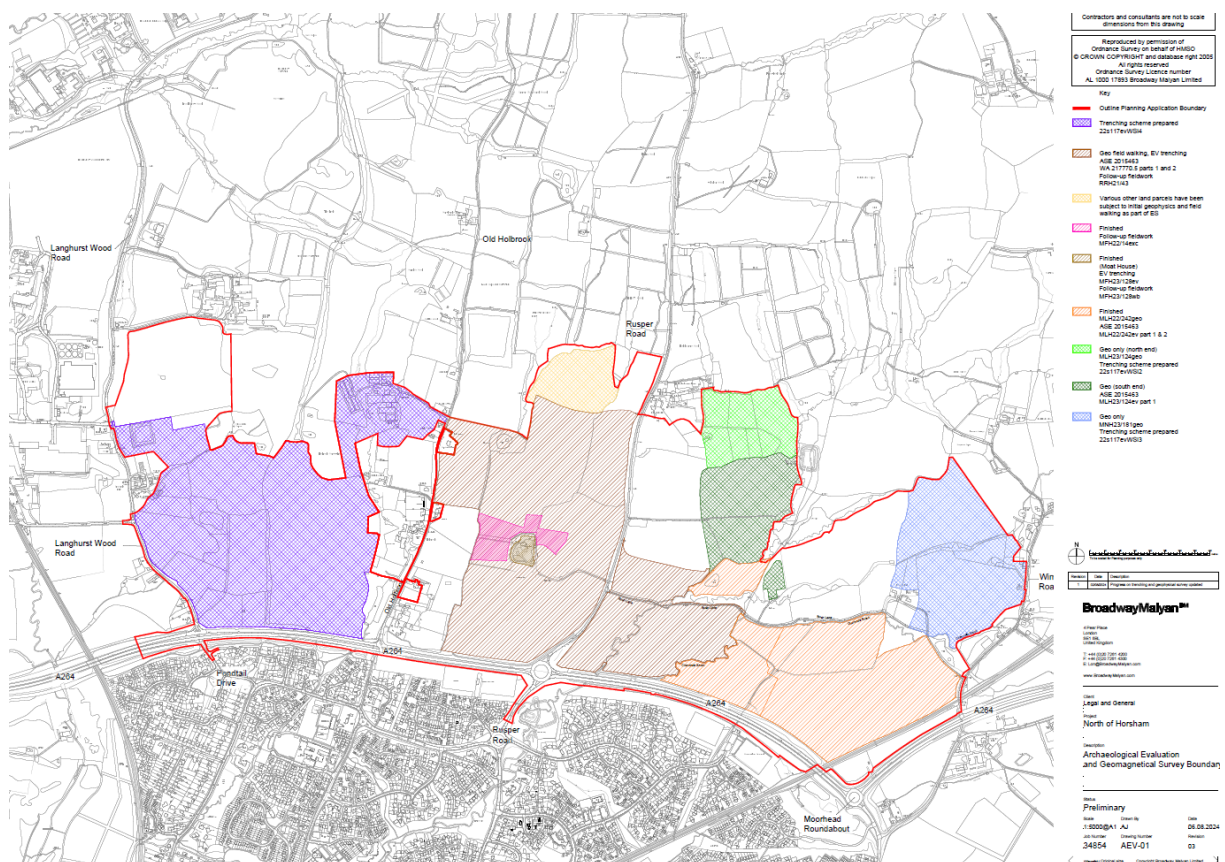
Relevance and Scale of the Proposed Variations

- 3.7.2 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.

Baseline Data Validity

- 3.7.3 Chapter 13 is supported by a Historic Environment Desk-Based Assessment which details the baseline of the Site and surrounding area. The chapter is also supported by Site visits and geophysical survey. The study area was established as a rectangular area around the Site measuring 5.5km east-west and 3.5km north-south following consultation with Historic England and the West Sussex County Council Archaeological Officer.
- 3.7.4 A Scheduled Monument (Homestead moat near Graylands Copse) and Grade II Listed Building (the Moated House) are located within the Site. In the surrounding area, there are two Scheduled Monuments, 40 Listed Buildings, and a Registered Park and Garden. Non-designated heritage assets within the Site include ancient woodland, historic hedgerows and a moderate to high potential for buried archaeological deposits.
- 3.7.5 The archaeology and heritage baseline is unlikely to have changed across the Site. 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. The progress of this is shown on Figure 3.1 below.

Figure 3.1: Archaeological and Geomagnetical Survey Boundary



- 3.7.6 It is noted that the wider Site of the Consented Development 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.

Validity of the Previous ES Findings and Identified Mitigation Measures

- 3.7.7 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.
- 3.7.8 Negligible, not significant impacts are anticipated for disturbance to ancient woodland, disturbance to the fabric of listed buildings, and disturbance to the settings of ancient monuments. Chapter 13 identifies that the sensitivity of the ancient woodland will mean an archaeological watching brief is required.
- 3.7.9 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.
- 3.7.10 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

Conclusion

- 3.7.11 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.
- 3.7.12 Residual effects reported within the 2017 ES Addendum are Minor / Moderate adverse construction phase effects to the disturbance of historic hedgerows, and Moderate / Minor adverse construction effects to the disturbance to the setting of listed buildings.

3.8 Chapter 15 Air Quality

- 3.8.1 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.

Relevance and Scale of Proposed Variations

- 3.8.2 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. While the location / layout of the road has been altered slightly from the layout that was assessed within the 2017 ES Addendum, it is not anticipated that the Proposed Development would be of a scale to change the previously reported air quality effects.

Baseline Data Validity

- 3.8.3 The baseline for Chapter 15 was established through obtaining information on existing air quality in Horsham, with background concentrations for the site defined using the national pollution maps published by Defra (2015). 11 existing properties close to the site were identified as receptors, located adjacent to the road network within the site. Emissions factors and background concentrations for 2020 have been combined with traffic data from 2031 to provide a conservative assessment of air quality impacts from the completed development, including cumulative schemes.

Validity of the Previous ES Findings and Identified Mitigation Measures

- 3.8.4 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.
- 3.8.5 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.

Conclusion

- 3.8.6 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.
- 3.8.7 The full application for the Proposed Development has been prepared to align with the layout previously assessed, and therefore the embedded mitigation of landscaping and buffering from transport routes would still apply. Furthermore, landscaping is proposed along the road, and the full application is accompanied by Landscape Design Statements, and Landscape Plans. It is proposed that a CEMP will be conditioned for the full application and would provide the relevant measures to manage construction dust and air quality effects.
- 3.8.8 Residual effects reported within the 2017 ES Addendum are not considered to be significant.

3.9 Chapter 16 Noise and Vibration

- 3.9.1 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.

Relevance and Scale of the Proposed Variations

- 3.9.2 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. By virtue of this, no new noise sensitive receptors are proposed.

Baseline Data Validity

- 3.9.3 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.

Validity of the Previous ES Findings and Identified Mitigation Measures

- 3.9.4 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 mitigate noise from construction activities through standard, best practice measures.
- 3.9.5 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.

Conclusions

- 3.9.6 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.
- 3.9.7 Significant residual effects reported in the 2017 ES Addendum are Moderate Adverse effects to noise and vibration levels as a result of construction works.

3.10 Chapter 17 Surface Water and Hydrology

- 3.10.1 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.

Relevance and Scale of the Proposed Variations

- 3.10.2 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 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.
- 3.10.3 The surface water drainage network serves the road infrastructure as well as the adjoining development parcels that will be the subject of future planning applications. The foul water network will also serve the adjoining development parcels, as well as a proportion of Phase 2 of the future development, all of which will be subject to future planning applications.
- 3.10.4 The proposed drainage infrastructure complies with appropriate design standards to enable adoption by Southern Water or a NAV (new appointments and variations), as appropriate.

Baseline Data Validity

- 3.10.5 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.

Validity of the Previous ES Findings and Identified Mitigation Measures

- 3.10.6 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.
- 3.10.7 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.
- 3.10.8 The full application is 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. The Flood Risk Assessment concludes that the Proposed Development *'is not at risk of flooding and can be developed safely without increasing flood risk elsewhere, and therefore the development proposals comply with relevant planning policy concerning flood risk. The report demonstrates that suitable provision for the disposal of foul and surface water from the proposed development can be provided.'*
- 3.10.9 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 the Preamble, 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.

Conclusion

- 3.10.10 The full application for the road is 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.
- 3.10.11 Residual effects reported within the 2017 ES Addendum are not considered to be significant.

3.11 Additional Topics Scoped Out

- 3.11.1 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.

Major Accidents and Disasters

- 3.11.2 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.
- 3.11.3 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.
- 3.11.4 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.

Climate Change

- 3.11.5 The 2017 EIA Regulations, at Regulation 2, states that *'The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors...climate...'* In Schedule 3 the EIA Regulations go on to state that *'The characteristics of a development must be considered with particular regard to... disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge.'* The final two references to climate are in Schedule 4 Parts 4 and 5 which state an ES must include *'A description of the factors ... likely to be significantly affected by the development: ... climate (for example greenhouse gas emissions, impacts relevant to adaptation)...'* and *'description of the likely significant effects of the development on the environment resulting from, inter alia ...the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.'*
- 3.11.6 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.
- 3.11.7 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.
- 3.11.8 The CEMP would include measures which would address procedures for the risk of extreme weather events during construction.
- 3.11.9 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.
- 3.11.10 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.
- 3.11.11 The 2016 ES confirms that the consented development has been designed to minimise the impact of transport on climate change through:

- Co-location of land uses;
- Investment in walking and cycling improvements and public transport;
- Preparation of a Site Wide Framework Travel Plan; and
- Improvements to the local highway network to accommodate development traffic.

3.11.12 The Proposed Development includes the enhancement of the walking route from Wimland Road to provide a connection to the Woodland Walk under the A264, and includes bus stops located within a reasonable walking distance from development parcels within Phase 2. The Proposed Development has been designed in line with the approved site-wide cycling strategy.

Human Health

3.11.13 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.

3.11.14 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.

3.11.15 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.

3.11.16 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.

3.11.17 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.

3.11.18 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.

Waste

3.11.19 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).

- 3.11.20 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.
- 3.11.21 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.
- 3.11.22 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.

4 Transport and Access

- 4.1.1 The 2016 ES Chapter 14 – Transport and Access assessed the potential impacts of the consented development and was authored by Peter Brett Associates. This chapter was not updated in the 2017 ES Addendum.

4.2 Relevance and Scale of Proposed Variations

- 4.2.1 The Proposed Development slightly alters the location of the road from what was previously assessed in the 2016 ES / 2017 ES Addendum. However, as set out within the Transport Statement the parameters and design principles 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.

4.3 Baseline Data Validity

- 4.3.1 Chapter 14 was supported by a Transport Assessment and Site Wide Framework Travel Plan, as well as site visits, desktop studies, and included assessment of links of the surrounding road network subject to traffic flow changes of 30% or more due to the consented development. The chapter assumed that the consented development would be fully operational by 2031.
- 4.3.2 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 where development has commenced for other phases of the consented development, this is managed in line with the CEMPs for these phases. 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.
- 4.3.3 A Transport Statement is provided which has considered the current baseline of the Local Highway Network, Public Rights of Way, and public transport.

4.4 Validity of the Previous ES Findings and Identified Mitigation Measures

- 4.4.1 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.
- 4.4.2 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.
- 4.4.3 Mitigation for these effects were embedded into the design of the Proposed Development. The chapter also confirmed that monitoring would be carried out by West Sussex County Council and Horsham District Council to ensure that identified levels of mitigation are delivered.

- 4.4.4 As set out within the Transport Statement, the design and parameters of the road remain consistent with those agreed for the outline application and have been agreed with West Sussex County Council. The proposed highways and associated drainage infrastructure complies with the design standards to enable adoption by West Sussex County Council appropriate.
- 4.4.5 Therefore, the embedded mitigation measures within the outline application for the Consented Development have been secured within the design of the Proposed Development.

4.5 Conclusion

- 4.5.1 A Transport Statement has been submitted with this application which has set out in further detail the alignment of the proposed road with the parameters assessed within the 2017 ES Addendum and has confirmed that there are no material changes to the reported conclusions of the 2017 ES Addendum.
- 4.5.2 Significant residual effects reported within the 2017 ES Addendum are Moderate Adverse construction phase effects to driver delay, but Major Beneficial operational phase effects to pedestrian and cyclist delay and amenity, severance of the A264 south of the Site, and severance of Langhurstwood Road.

5 Cumulative Development

- 5.1.1 Chapter 18 of the 2017 ES Addendum addresses the potential cumulative effects of the consented development in combination with committed developments as of October 2015, updated in March 2017.
- 5.1.2 The 2017 ES Addendum identified the following cumulative effects based on the assessment of the committed development set out in Section 18 of the ES Addendum:
- Major beneficial cumulative effect from the planned housing and employment provision from the combined socio-economic impacts of the Land at North Horsham development and other sites.
 - Moderate adverse effect to the loss of agricultural land;
 - Potential cumulative impact on the Buchan Hill Ponds SSSI from increases in nitrogen concentration and deposition, which relates to both air quality and ecology, although these effects are likely to be localised to the A264;
 - Temporary moderate adverse effects from construction related noise on sensitive receptors around the site.
- 5.1.3 A review of the HDC planning portal indicates that the majority of these schemes have been built out or are under construction. Additional applications which have come forwards since the 2017 ES Addendum include the following:
- Former Novartis Site, Parsonage Road, Horsham, West Sussex (DC/25/0425), application for 244 new homes, submitted 18.03.25. Currently pending decision.
 - Former Novartis Site, Parsonage Road, Horsham, West Sussex (DC/25/0629), application for 206 new homes, submitted 16.04.25. Currently pending decision.
 - Kingsmead Nursing Home, Crawley Road, Horsham, West Sussex (DC/24/1010) application for the demolition of existing buildings and erection of an 80-bedroom specialist dementia care home. Granted 08.04.25.
 - Land to the North and South of Mercer Road, Warnham, West Sussex (DC/25/0151) application for 304 residential units. Submitted 30.01.25.
- 5.1.4 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.
- 5.1.5 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. As 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 considered that no amendment to the conclusions of the 2017 ES Addendum in terms of cumulative effects is required.

6 Significant Residual Effects

6.1.1 The 2017 ES Addendum concluded significant residual effects for various technical topics. Many of these were significant beneficial effects. The significant effects identified are listed below:

- Socio-economics – Major Beneficial effects for the creation of employment in the construction phase, and Major Beneficial operational effects for contribution to housing requirement, contribution to local housing need, impact on job creation, impact on education, and impact on health provision.
- Contamination and Remediation – Moderate Beneficial operational effects for the remediation of contaminated soil and groundwater and the effect of residential end use.
- Agricultural Land – Moderate Adverse effects during the construction phase from the direct loss of subgrade 3a and 3b agricultural land, and Moderate / Minor construction effects from the loss of soil resources.
- Landscape and Visual – Moderate Beneficial Effects at Year 15 to landscape elements and landscape patterns / character of the site of the consented application, and minor to moderate beneficial effects to the West Sussex County Landscape Character Areas of the Northern Vales and Lower Weald Hills. Moderate adverse effects to half of the 75 visual receptor viewpoints at Year 1, although this was reduced by year 15, resulting in beneficial effects to the majority of viewpoints.
- Archaeology and Heritage – Minor / Moderate adverse construction phase effects to the disturbance of historic hedgerows, and Moderate / Minor adverse construction effects to the disturbance to the setting of listed buildings.
- Transport – Moderate Adverse construction phase effects to driver delay, but major beneficial operational phase effects to pedestrian and cyclist delay and amenity, severance of the A264 south of the Site, and severance of Langhurstwood Road.
- Noise and Vibration – Moderate Adverse effects to noise and vibration levels as a result of construction works.
- Ecology – Significant impact at the Site level for certain declining farmland birds (skylark, yellowhammer), although other declining bird species are likely to benefit (dunnock, house sparrow, starling). Potentially positive Local level effects to invertebrates.

7 Conclusion

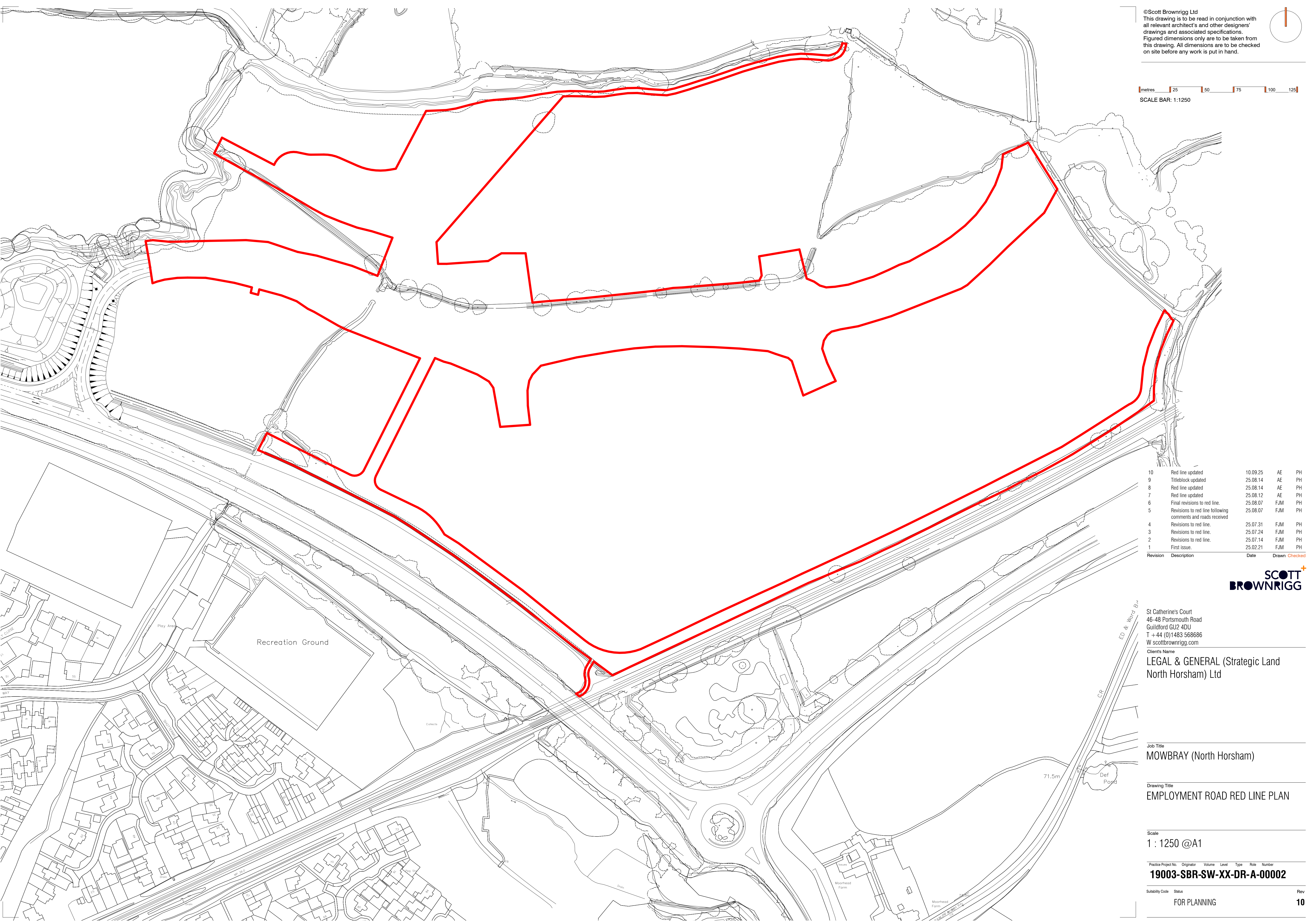
- 7.1.1 In conclusion, this ES has considered the validity of the baseline, assessment, and conclusions of the 2017 ES Addendum submitted with the outline application for up to 2,750 dwellings, and their relevance to the Proposed Development in support of this full planning application.
- 7.1.2 Given the nature of the Proposed Development as a road with associated landscaping and drainage, which aligns with the parameters assessed within the 2017 ES Addendum, it is not considered that the Proposed Development would result in any new or different material effects to those reported in the 2017 ES Addendum and that the residual significant effects reported remain valid.

8 Availability of the ES

- 8.1.1 As a statutory requirement, this ES Addendum will be published on the planning portal of HDC and as such is available for viewing and downloading by any interested party.
- 8.1.2 Comments on the application can either be made to HDC directly or can be forwarded to the following address:

Horsham District Council
Parkside
Chart Way
Horsham, West Sussex
RH12 1RL

Appendix 1.1 Site Location Plan



©Scott Brownrigg Ltd
This drawing is to be read in conjunction with
all relevant architect's and other designers'
drawings and associated specifications.
Figured dimensions only are to be taken from
this drawing. All dimensions are to be checked
on site before any work is put in hand.

metres 25 50 75 100 125
SCALE BAR: 1:1250

10	Red line updated	10.09.25	AE	PH
9	Titleblock updated	25.08.14	AE	PH
8	Red line updated	25.08.14	AE	PH
7	Red line updated	25.08.12	AE	PH
6	Final revisions to red line.	25.08.07	FJM	PH
5	Revisions to red line following comments and roads received	25.08.07	FJM	PH
4	Revisions to red line.	25.07.31	FJM	PH
3	Revisions to red line.	25.07.24	FJM	PH
2	Revisions to red line.	25.07.14	FJM	PH
1	First issue.	25.02.21	FJM	PH

Revision Description Date Drawn Checked

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Client's Name
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Drawing Title
EMPLOYMENT ROAD RED LINE PLAN

Scale
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Rev
10

Appendix 1.2 2017 ES Addendum

[2017 ES Addendum.doc](#)