



# **Newbridge Park, Land West of Billingshurst**

## **Environmental Impact Assessment (EIA)**

### **Scoping Report**

January 2026

**Applicant**  
Highwood Ventures 5 Limited and Vivid Housing Limited

**Our reference**  
HIGS3003

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**Turley**

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# 1. Introduction

## Overview

- 1.1 Highwood Ventures 5 Limited and Vivid Housing Limited (the 'Applicant') is preparing to submit an application for a hybrid planning permission (the 'Application') for a residential-led development for up to 1,100 dwellings, 2 Form Entry (2FE) primary school, care provision, a community centre, retail space, provision of sports facilities, country park, public open space and associated infrastructure (the 'Proposed Development'). The Application will be submitted to Horsham District Council (HDC) as the local planning authority (LPA).
- 1.2 The Applicant has instructed Turley to lead, manage and control the Environmental Impact Assessment (EIA) process for this project in line with the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (as amended)<sup>1</sup> (the 'EIA Regulations').
- 1.3 The project team have developed a description of the Proposed Development (a 'High Level Development Specification'), which is outlined in **Chapter 4**. Whilst the Proposed Development continues to be refined and the development principles agreed upon, **Chapter 4** aims to provide factual and sufficient information to inform the EIA Scoping process and the preparation of this EIA Scoping Report.
- 1.4 In line with the above, the area to be considered for the purpose of the EIA (the 'Site') is approximately 106.29 hectares (ha) and is shown in **Figure 1.1**. The Site primarily comprises agricultural land with woodland, a sports complex (including pitches, parking provision and building), buildings, an electrical substation, overhead lines (OHLs) and highway land also contained within the Site that is located to the west of Billingshurst. There are also multiple Public Right of Way (PRoW) crossing through the Site, including: BIL 1327 (west to east); BIL 1326 (north west to south west); and BIL 1335 (north to south). The Site boundary is considered to represent the maximum extent of all temporary and permanent works that may be required as part of the Proposed Development, including access infrastructure improvements and related highway works to enable the Proposed Development.

## Request for a Scoping Opinion

- 1.5 To inform the EIA process, in accordance with Regulation 15 of the EIA Regulations, Turley, on behalf of the applicant, requests an EIA Scoping Opinion from HDC, informed by this EIA Scoping Report.
- 1.6 In line with Regulation 15(2) of the EIA Regulations, this report contains the following:
  - A plan sufficient to identify the land (**Figure 1.1**);

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<sup>1</sup> The Town and Country Planning (EIA) Regulations 2017 No. 571 (as amended).

- A description of the Proposed Development, including its nature, purpose, location, and technical capacity (**Chapter 4**);
- An explanation of the likely significant effects of the Proposed Development on the environment (**Technical Chapters 6 – 14**); and
- Such other information or representations as the person making the request may wish to provide or make.

1.7 This EIA Scoping Report has been prepared in line with common EIA practice, whereby the appointed project team, based on an understanding of the Site and the preliminary understanding of the Proposed Development (as set out in **Chapter 4**), have:

- Established the existing technical baseline, either through desk-top studies/reviews, surveys, and evaluation of available technical data;
- Identified the topics and effects which are unlikely to be significant, due to the absence of a receptor (due to the location of the Site) or source of an effect due to the nature of the Proposed Development (as defined in **Chapter 4**), or through the commitment to mitigation;
- Identified the effects which are likely to be significant and the sensitive receptors that will be assessed in the ES; and
- Established the methodology for assessing the effects in the ES which are likely to be significant.

1.8 The above is documented in **Chapter 5** and **Technical Chapters 6 – 14**.

1.9 The EIA Scoping Opinion is sought on the breadth of the technical topics and associated effects to be considered within the EIA and reported on in the ES, as well as the scope and methodology for assessment.

1.10 In accordance with Regulation 15(4) of the EIA Regulations, it is anticipated that the statutory timescales will be met, and that Turley will be in receipt of a Scoping Opinion from HDC no later than five weeks from the date of receipt of this request. Any deviation from this will be subject to a request from HDC and subsequent agreement by the Applicant.

1.11 Furthermore, in line with Regulation 28, it is anticipated that HDC will make available this EIA Scoping Report and their corresponding EIA Scoping Opinion, with accompanying consultee comments where applicable, for public inspection, either through the HDC planning portal website or by other means.

### **Definition of EIA**

1.12 The term 'EIA' has the meaning given by Regulation 4 of the EIA Regulations, as "*a process consisting of -*

*(a) the preparation of an environmental statement;*

*(b) any consultation, public and notification required by, or by virtue of, these Regulations or any other enactment in respect of EIA development; and*

*(c) the steps required under regulation 26' (consideration of whether planning permission or subsequent consent should be granted)".*

- 1.13 Under Regulation 4, Paragraph 2, an 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 -*

*(a) population and human health*

*(b) biodiversity, with particular attention to species and habitats protected under any law that implemented Directive 92/43/EEC<sup>2</sup> and Directive 2009/147/EC<sup>3</sup>;*

*(c) land, soil, water, air and climate;*

*(d) material assets, cultural heritage and the landscape; and*

*(e) the interaction between the factors referred to in sub-paragraphs (a) to (d)".*

- 1.14 EIA is a procedure that must be followed for certain types of projects before 'development consent' (i.e., planning permission) can be given. The procedure is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This helps to ensure that the importance of the predicted effects and the scope for reducing or mitigating them are properly understood by the public and the relevant Local Planning Authority (in this case, HDC) before it makes its decision.

- 1.15 The aim of EIA, as defined by national Planning Practice Guidance (PPG), is to *"protect the environment by ensuring that a local planning authority when deciding to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process...."* and *"..also to ensure that the public are given early and effective opportunities to participate in the decision making procedures"*<sup>4</sup>.

### **Requirement for EIA**

- 1.16 The Proposed Development (see **Chapter 4**) has been assessed against the categories of development set out within Schedule 1 and Schedule 2 of the EIA Regulations. The Proposed Development does not comprise Schedule 1 development (large schemes for which EIA is mandatory); however, it does exceed the threshold and criteria within Schedule 2, Paragraph 10(b): *'Urban development projects'*. For projects not in a 'sensitive area', the EIA Screening thresholds under 10(b) are:

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<sup>2</sup> OJ No. L 206, 22.7.1992, p. 7.

<sup>3</sup> OJ No. L 20, 26.1.2010, p. 7.

<sup>4</sup> Department for Levelling Up, Housing & Communities (DLUHC) and Ministry of Housing, Communities & Local Government (MHCLG), PPG, Paragraph 002 Reference ID: 4-002-20140306 [Online].

- (i) non-dwelling development of more than 1ha;
  - (ii) developments of more than 150 dwellings, or
  - (iii) an overall area of development exceeding 5ha<sup>5</sup>.
- 1.17 Whilst the applicable thresholds are met, this does not determine the requirement for EIA but requires a subsequent stage to determine “...likely significant effects on the environment by virtue of factors such as its nature, size or location”.
- 1.18 At this stage, a number of potential likely significant effects have been identified (see **Chapters 6 – 14**). Therefore, an EIA will be undertaken, the outputs of which will be reported in an Environmental Statement (ES). The EIA is being used as a tool to identify and manage the environmental impacts and, where possible, avoid, reduce or offset them as part of the design process (see further details in **Chapter 2**).

### **Stakeholder Engagement**

- 1.19 Consultation is an important part of the EIA process. It is the responsibility of HDC to undertake the appropriate level of consultation, including the identification of relevant and applicable statutory and non-statutory consultees, required to inform their Scoping Opinion.
- 1.20 It is anticipated that HDC will consult with the following stakeholders during the preparation of their Scoping Opinion:
- HDC (internal technical departments);
  - West Sussex County Council (WSCC);
  - Lead Local Flood Authority;
  - Environment Agency;
  - Natural England;
  - National Highways;
  - Health and Safety Executive;
  - Historic England; and
  - Utility Providers.
- 1.21 In advance of preparing this report, consultation with several of the above consultees has already been undertaken and continues to inform specifics of the design of the Proposed Development, baseline data collection and assessment methodologies. A

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<sup>5</sup> Changed from 0.5 ha to 5 ha following amendments made as part of The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 No. 695. Available at: <https://www.legislation.gov.uk/uksi/2018/695/made> [Accessed: 12/11/2025].

summary of the project consultation undertaken before or during the preparation of the EIA Scoping Report is provided in **Appendix 1.1**.

## 2. Approach to EIA

### Objectives

- 2.1 This report supports a formal request for a Scoping Opinion from HDC as to the scope and methodology for assessment to be adopted in the EIA and reported in the ES. It aims to ensure that there is a clear and agreed scope for the EIA, including the relevant baseline studies, that will be required to ensure a robust assessment of likely significant effects.
- 2.2 The Scoping Opinion is sought on the technical breadth of the technical topics considered within the EIA and the specific effects within each of these technical topics (**Technical Chapters 6 – 14**).
- 2.3 The Institute of Sustainability and Environmental Professionals (ISEP) (previously known as the Institute of Environmental Management and Assessment (IEMA)) has issued guidance on the interaction of design and EIA as part of their 'Delivering Quality Development'<sup>6</sup>. The principles of these documents have been adopted for the EIA.

### Iterative Approach to Scoping

- 2.4 Whilst this report seeks to establish the overall framework for the EIA in relation to the technical topics and associated likely significant effects that will be subject to detailed assessment, iterative 're-scoping' will continue as the design and strategy are refined, plans and principles are developed and additional technical work is completed. Whilst the EIA will be based on the EIA Scoping Opinion (as required by Regulation 18, (4), (a)), it will take account of the continued understanding of environmental effects and development of primary and tertiary mitigation (see 'Defining Mitigation and how this will be Controlled'). This iterative 're-scoping' process will continue up until the point when the assessments within the ES are in their first draft, in advance of submission.
- 2.5 Any deviation between the scope of effects considered within this report and the ES will be clearly communicated in the ES. This is in accordance with the PPG<sup>7</sup>, which states that  
  
*"...where it becomes evident during the assessment process...that a particular environmental factor is absent or unlikely to be significantly affected by a proposed development, there should be no need for further assessment of that factor even though it was identified in the scoping process..."*
- 2.6 It is requested that such an approach be clearly endorsed within the EIA Scoping Opinion issued by HDC.

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<sup>6</sup> ISEP (2025) EIA Guide to: Delivering Quality Development.

<sup>7</sup> DLUHC and MHCLG, PPG, Paragraph: 038 Reference ID: 4-038-20170728 [Online].

## Definition of the Proposed Development

2.7 The Proposed Development, in summary, includes the following:

- Up to 1,100 dwellings;
- 2 Form Entry (2FE) Primary School;
- Care provision (up to 80 beds);
- A community centre;
- Retail space (25,000 ft<sup>2</sup> Gross Internal Area (GIA));
- Provision of sports facilities;
- Traveller site
- Country park;
- Access;
- Public open space and associated infrastructure.

2.8 A High-Level Development Specification, describing the Proposed Development, including the components above, is provided in **Chapter 4**.

## Approach to the Consideration of Alternatives

2.9 Schedule 4, Paragraph 2 of the EIA Regulations states that an ES should include:

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

2.10 The PPG<sup>8</sup> states that *“where alternative approaches to development have been considered, the Environmental Statement should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the environmental effects”.*

2.11 The EIA Regulations and PPG do not require an applicant to consider alternatives, but instead, where reasonable alternatives have been considered by the Applicant, these should be described, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects, should be provided.

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<sup>8</sup> DLUHC and MHCLG, PPG, Paragraph 041 Reference ID: 4-041-20170728 [Online].

2.12 The EIA Regulations and the PPG do not identify a specific methodology for the consideration of reasonable alternatives nor any associated criteria. Therefore, the methodology to be adopted will be based on professional experience of similar projects and an understanding of the Proposed Development and its characteristics, as well as a focus on the delivery of a proportionate report, in line with PPG.

2.13 The consideration of alternatives will therefore follow a two-step approach, with Step 1 completed as part of this report:

- **Step 1:** Consideration of ‘factors’ that constitute alternatives based on the EIA Regulations (i.e., alternative sites, alternative designs, alternative technologies and the ‘do nothing’ scenario) and justification/discussion of their inclusion/exclusion from further reporting; and
- **Step 2:** Qualitative appraisal of the ‘factors’ brought forward from Step 1 and, where appropriate, a comparison of the environmental effects.

**Step 1 – Consideration of Factors**

2.14 The relevant factors have been considered to determine the need for further reporting:

- Alternative sites – The Applicant only has control of the land within their ownership, therefore no alternative sites are viable or have been considered. Therefore, this is not considered further within the EIA.
- Alternative designs – The design of the Proposed Development has and will evolve in response to studies and surveys to take account of environmental constraints and opportunities, and feedback. As such, alternative design will be taken forward to Step 2.
- Alternative technologies – Given the nature of the land uses proposed (as stated in *para 2.7*), alternative technologies are not considered applicable for this type of development. The Application will be hybrid in nature; as such, the full details of construction methods and technologies are not known, and construction methods will be assessed on a ‘worst case’ basis rather than specific construction methods/technology. As such, alternative technologies/uses will not be taken forward to Step 2; and
- ‘Do Nothing’ Scenario – Schedule 4, Paragraph 3 of the EIA Regulations requires an ES to include a description of the relevant aspects of the current baseline environment which are likely to evolve without the implementation of development, subject to the availability of environmental information and scientific knowledge. The assessments of environmental effects presented in the ES<sup>9</sup> will include the determination of the Site’s ‘Future Baseline’, being the likely condition of the Site in the absence of the Proposed Development or other development. As such, the ‘Do Nothing’ Scenario will be taken forward to Step 2.

- 2.15 As set out above, 'Alternative Designs' and 'Do Nothing' scenarios will be taken forward from Step 1 into Step 2 and reported in the ES.
- 2.16 It is requested that such an approach be clearly endorsed within the EIA Scoping Opinion issued by HDC.

### **The Extent of Data Collection**

- 2.17 The Site, upon which baseline data has been collected is defined in **Figure 1.1**. As noted in **Chapter 1**, this is considered to be the maximum extent of all permanent and temporary works associated with the components of the Proposed Development (see 'Definition of the Proposed Development' above).
- 2.18 Where required, technical specific study areas (informed by relevant best practice and guidance) will be based upon the Site (i.e. radius of searches will be from the Site).
- 2.19 The boundary for the collection of baseline data was extended recently to accommodate any potential works to the neighbouring highway network (i.e. A272/A29). Therefore, the baseline data excludes this area. However, this is considered acceptable due to the limited value/sensitivity of areas within the highway corridor and the limited likelihood for significant direct effects with any works proposed. Baseline data for adjacent areas will also inform our understanding of the existing environment. Additional, relevant ecological surveys will be undertaken as outlined in **Chapter 9**; however, this is unlikely to change the scope or methodology.

### **Assessment Against a Consistent Baseline Environment**

- 2.20 Schedule 4, Paragraph 3 states that an ES should include:
- "A description of the relevant aspects of the current state of the environment (baseline scenario)..."*
- 2.21 Likely significant effects as a result of the Proposed Development will be described in the ES in relation to the deviation from the baseline environment within the Site and/or relevant technical study areas.
- 2.22 For most technical topics and associated effects, the baseline environment will comprise the existing environmental characteristics and conditions based on surveys undertaken and information/data available at the time of the technical assessments.
- 2.23 The data used to inform the baseline conditions for the technical assessments reported in the ES (for those technical topics 'scoped in', see **Technical Chapters 6 – 14** for more details) will vary depending upon the timing of the survey or the date when data sources will have been accessed. It is anticipated that the baseline conditions will largely be based on data accessed or surveys/studies completed in 2025/2026. Where relevant and robust, other data obtained from third parties may be older than 2025/2026, though may still be appropriate and relevant to the baseline scenario if there have been no notable changes, it is the latest available information or is representative of the existing baseline.

- 2.24 A consolidated list of baseline data sources will be provided as part of the ES. The origin of all data, the dates of surveys and the dates when data sources have been accessed will be clearly outlined alongside any limitations and assumptions.

### **Consideration of Future Baseline**

- 2.25 Schedule 4, Paragraph 3 states that an ES should include:

*“...an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.”*

- 2.26 As required by the EIA Regulations, the ES will report the future baseline scenario. This will consider potential changes to the Site and study area, assuming no further development and the continuation of the existing management regime.

### **Identification of Sensitive Receptors**

- 2.27 Schedule 4, Paragraph 4 states that an ES should include:

*“A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.”*

- 2.28 Informed by baseline information and data, a series of receptors or receptor groups are identified, which are subject to likely significant effects arising from a project. These receptors are then subject to assessment within the EIA.
- 2.29 Details of the receptors which are considered likely to be affected at this stage are set out in **Technical Chapters 6 – 14**.

### **Defining Mitigation and how this will be Controlled**

- 2.30 Schedule 4, Part 7 of the EIA Regulations states that an ES should include:

*“a description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases”.*

- 2.31 Through the EIA process, different types of mitigation have been / will be identified and developed, and these are defined as:

- **Primary mitigation** – modifications to the location or design of the Proposed Development made during the pre-application stage that are an inherent part of the project;
- **Secondary mitigation** – actions that will require further activity in order to achieve the anticipated outcome and secured by planning condition / and or obligation; and
- **Tertiary mitigation** – actions that would occur with or without input from the EIA feeding into the design process. These include actions that will be undertaken to meet other existing legislative requirements or actions that are considered to be standard practices used to manage commonly occurring environmental effects.

- 2.32 The assessment of the likely significant environmental effects of the Proposed Development within the ES will be based on the information contained within a 'Development Specification', which will include primary and tertiary mitigation. Examples of primary mitigation include green infrastructure and associated set-backs, the retention of some of the existing features and the proposed surface water drainage strategy. Examples of tertiary mitigation include the adoption of best practice measures that can be controlled via a Construction Environmental Management Plan (CEMP), or measures required by legislative requirements (e.g., the Construction (Design and Management) Regulations 2015<sup>10</sup>).
- 2.33 Primary and tertiary mitigation known at this stage is set out in the Preliminary Environmental Management Plan (EMP) provided as **Appendix 2.1**.
- 2.34 Within the ES, following the conclusion of the likely significant effects based on the Proposed Development (inclusive of primary and tertiary mitigation), any further mitigation (secondary mitigation) to reduce an adverse effect or enhance a beneficial one will be identified.
- 2.35 Secondary or tertiary mitigation measures are only considered appropriate if there is a high level of confidence in their mechanism for implementation (by the Applicant or third party).
- 2.36 The ES will be supported by an Environmental Management Plan (EMP) which will detail all mitigation identified within the EIA process (including EIA Scoping) and will form Volume 3 of the ES (see 'Format of the ES').
- 2.37 This document will define all the environmental requirements of the Proposed Development to ensure that the impacts concluded through the EIA process can be relied upon. The EMP can be extracted by HDC to support the preparation of appropriate planning conditions/obligations attached to any planning permission, where necessary.

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<sup>10</sup> Construction (Design and Management) Regulations 2015 (available at: <https://www.legislation.gov.uk/uksi/2015/51/contents>)

### **Consideration of Off-Site Mitigation**

- 2.38 Off-site improvements/mitigation are likely to be limited to highway improvements, which will be understood when junction modelling is undertaken. Upgrades to utility infrastructure are unknown at this stage, but it is likely that a third party will be responsible for delivering any relevant upgrades/diversions.
- 2.39 Any improvements, if required, will be considered at a high-level within the ES. It is considered appropriate that such mitigation does not need to be within the Site, as any impact will be assessed and controlled as part of a separate approval process for such works, which will be subject to its own protocols to understand any environmental issues.
- 2.40 However, where appropriate, such works may be considered as part of the cumulative assessment in the EIA.

### **Information to Inform the Assessments within the ES**

- 2.41 The ES will be based on a defined set of parameter plans and design principles. These design principles will form part of the Development Specification that will accompany the ES and set the framework for the assessment of likely significant environmental effects, and will only include the necessary information required to inform a robust assessment. It will outline the key development principles, including quantum of development (e.g., residential units, employment floorspace), infrastructure requirements, and timescales. This document, together with the parameter plans, will form the basis of the EIA and define the scope within which all technical assessments will be undertaken. These plans will include, but are not limited to, maximum building heights, development zones, access points, and land use distribution across the Site.
- 2.42 The ES will assess the Proposed Development in accordance with these parameters to ensure flexibility within an agreed envelope of development. This approach allows for a degree of design evolution through future detailed design stages, while still enabling a robust environmental assessment. These documents are intended to provide clarity for the determining authority and stakeholders, establishing the parameters within which future reserved matters applications or detailed design stages will be brought forward. The ES will therefore evaluate the 'worst-case' scenario within these defined parameters to ensure that any potential environmental effects are properly mitigated where necessary.
- 2.43 Further detail will be delivered in support of the hybrid part of the outline Application. Where necessary to inform an assessment of likely significant effects, this may be added to the Development Specification. However, in general, it is not anticipated that there will be a need to link many of the detailed plans to the ES. This will avoid the need to revisit the ES in the future when relatively minor changes are made (which are within the parameters outlined within the Development Specification).

### **Assessment Scenarios**

- 2.44 The EIA will assess the likely significant environmental effects arising from the Proposed Development, taking account of site preparation / enabling works,

demolition, earthworks, remedial works and construction (collectively referred to as the 'construction') and operational stages.

2.45 In order to provide an assessment of a reasonable 'worst case', the following scenarios will be assessed where relevant to each technical topic (and likely significant effects):

- Baseline (2026) + Proposed Development Peak Construction – this will vary across technical topics and will not be attributed to a specific year, rather it will be determined at what point the worst-case effect could occur. This will be clearly defined within the technical assessments reported in the ES.
- Baseline (2026) + Proposed Development Full Operation – this will consider environmental effects associated with the full operation of the Proposed Development, once completed.
- Baseline (2026) + Proposed Development Full Operation + Cumulative Projects – This will consider environmental effects associated with the full operation of the Proposed Development and the identified Cumulative Projects (as stated in **Chapter 15**).

2.46 All scenarios will be considered against the existing baseline conditions as defined above (see 'Assessment Against a Consistent Baseline Environment').

2.47 It should be noted that the assessment scenarios set out are for the purposes of the EIA only. For a number of standalone technical assessments (see 'Interactions of the ES with Other Application Documents and Plans' below), alternative or additional scenarios may be considered and/or required.

### **Approach to Defining Level of Effect and Significance**

2.48 The method for assessment of effects (i.e. assessment criteria) will vary somewhat across technical topics, owing to the presence of specific technical guidance prepared in isolation. However, the assessment of likely significant effects (and specifically the conclusions) will be based on a singular common approach.

2.49 A stepped approach will be adopted to define effects for the construction and/or operational stages of the Proposed Development, as outlined below. The steps comprise the following, which are discussed further below:

- Step 1: Define environmental sensitivity;
- Step 2: Define magnitude of change;
- Step 3: Define level of effect; and
- Step 4: Conclude on significance.

2.50 The method for assessing the level of effect varies between technical topics but in principle will be based on:

- **The environmental sensitivity (or value, importance, etc.) of a receptor** – including aspects such as adaptability, tolerance to change or recoverability from a change; and
  - **The magnitude of change (or impact) from the baseline conditions** – including aspects such as probability/likelihood of occurrence, geographical extent, complexity, duration, frequency and reversibility (i.e. temporary or permanent).
- 2.51 Sensitivity (or value, importance, etc.) will be assessed on a scale of high, medium, low and negligible and the magnitude of change (or impact) will be assessed on a scale of large, medium, small and negligible.
- 2.52 Where relevant, other factors such as feedback from stakeholders, relevant legislation, international / national / regional / local standards and guidance and the inter-relationship between effects will also be considered.
- 2.53 The interpretation and use of the above will be set out within the assessment methodology of each technical topic within the ES.
- 2.54 The assignment of the level of effect will be based on professional judgement with the support of the matrix below (Table 2.1), which is seen as a tool to assist with the process. Whilst the matrix within Table 2.1 provides ranges, this is to guide the competent expert, and a definitive level of effect will be provided, where possible, for each effect.

**Table 2.1: Matrix to support determining the level of effect**

|                                 |            | Sensitivity (or value, importance, etc.) |                   |                     |            |
|---------------------------------|------------|------------------------------------------|-------------------|---------------------|------------|
| Magnitude of change (or impact) |            | High                                     | Medium            | Low                 | Negligible |
|                                 | Large      | Major                                    | Moderate to Major | Minor to Moderate   | Negligible |
|                                 | Medium     | Moderate to Major                        | Moderate          | Minor               | Negligible |
|                                 | Small      | Minor to Moderate                        | Minor             | Negligible to Minor | Negligible |
|                                 | Negligible | Negligible                               | Negligible        | Negligible          | Negligible |

- 2.55 The terms set out in Table 2.1 used to define the level of effects identified are described as follows, and these can be ‘beneficial’ or ‘adverse’:
- **Major effect** – where the Proposed Development is likely to cause a considerable change from the baseline conditions and the receptor has limited adaptability, tolerance or recoverability or is of the highest sensitivity;
  - **Moderate effect** – where the Proposed Development is likely to cause either a considerable change from the baseline conditions at a receptor that has a degree

of adaptability, tolerance or recoverability or a less than considerable change at a receptor that has limited adaptability, tolerance or recoverability;

- **Minor effect** – where the Proposed Development is likely to cause a small, but noticeable change from the baseline conditions on a receptor that has limited adaptability, tolerance or recoverability or is of the highest sensitivity or a considerable change from the baseline conditions at a receptor which can adapt, is tolerant of the change and/or can recover from the change; and
- **Negligible** – where the Proposed Development is unlikely to cause a noticeable change at a receptor, despite its level of sensitivity or there is a considerable change at a receptor that is not considered sensitive to a change.

- 2.56 For some technical topics, relevant guidance or the nature of the effect requires that differing criteria or scales for determining the level of effect be used. For consistency within the ES, the final 'level of effect' will be reported using the terminology and conclusions set out above. This enables the conclusions of assessments across all technical topics to be understood for the decision-making process, along with allowing robust analysis and appraisal as part of the assessment of cumulative effects.
- 2.57 For each effect, a binary judgement will be made as to whether the effect is 'Significant' or 'Not Significant'. This determination will be based on professional judgement and/or relevant guidance and standards, where applicable. Significance will only be concluded for residual effects (i.e. following the identification of secondary mitigation or enhancement).
- 2.58 Effects will also be described in line with the requirements of the EIA Regulations (i.e. as direct or indirect; short (<1 year), medium (1 – 10 years) or long-term (10+ years); permanent or temporary).
- 2.59 Summary of effect tables that outline the likely significant effects, receptors, residual level of effect and whether this is considered to be 'Significant' or 'Not Significant' will be provided at the end of each Technical Chapter within the ES.
- 2.60 Cumulative effects will be considered as a single coordinated assessment as outlined in **Chapter 15**.

### **Format of the ES**

- 2.61 The ES will comprise four volumes:
- **Volume 1: Primary Report and Supporting Graphics;**
  - **Volume 2: Technical Appendices to the Primary Report;**
  - **Volume 3: Environmental Management Plan; and**
  - **Volume 4: Non-Technical Summary.**

## Competent Expertise

- 2.62 Regulation 18, Paragraph 5(a) of the EIA Regulations requires the ES to be prepared by competent experts.
- 2.63 The EIA will be led by Turley. ISEP<sup>11</sup> has awarded Turley the EIA Quality Mark in recognition of our technical quality and commitment to improvement in practice.
- 2.64 All technical assessments within the EIA will be undertaken by a suitably qualified project team, inclusive of a thorough technical review to assure technical credibility, followed by a subsequent procedural review by the EIA co-ordination team and EIA Project Director.
- 2.65 In line with the EIA Regulations, all contributors to the EIA are competent experts in EIA, and this will be demonstrated in the ES with an overview of each key expert's qualifications, professional accreditations, and experience provided in **Appendix 2.2**.



## Interaction of the ES with Other Application Documents and Plans

- 2.66 The Application will be accompanied by a number of documents and plans, some of which will inform the ES and will be appended to the ES as supporting technical evidence (included as part of Volume 2). Other documents and plans will form standalone 'Application Documents', which provide a greater level of detail of how the Proposed Development complies with relevant policy or provide assessments for technical topics for which no likely significant effects are considered to arise (i.e., 'scoped out' of the ES). Where they contain information of relevance to the EIA, this will be summarised in the ES to ensure sufficient and robust data is included.
- 2.67 At this stage, the following documents are anticipated to be included as appendices to the ES in Volume 2:
- Construction Dust Assessment;
  - Construction Noise and Vibration Assessment;
  - Ecological Impact Assessment;
  - Ecological Survey Reports;
  - Archaeological and Heritage Desk-Based Assessment;
  - Geophysical Survey Results;
  - Heritage Assessment; and
  - Landscape and Visual Impact Assessment.

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<sup>11</sup> Formerly Institute of Environmental Management and Assessment (IEMA).

## Interaction of ES with Permits and Consents

- 2.68 Permits and/or consents will be necessary for the Proposed Development, both for construction and operational activities. The key permits/consent for the Proposed Development is outlined below:
- Ordinary Watercourse Consent (OWC) – As identified in ‘*Water Environment*’ in **Chapter 5**, a single watercourse located in the north of the Site will require realignment to deliver enhanced ecological benefits as part of the Proposed Development. As this watercourse is classified as an ordinary watercourse, approval for realignment works will be obtained from the Lead Local Flood Authority, which is the regulatory body responsible for consenting works that may alter the flow, structure, or capacity of ordinary watercourses.
- 2.69 This consenting regime sits outside of the Town and Country Planning regime and, in some cases, the EIA Regulations. Nevertheless, there is often some overlap between the assessment work undertaken to inform the ES (and wider Application) and the information to secure an Ordinary Watercourse Consent.
- 2.70 Where there is a commonality between the effects being assessed through the EIA (e.g. hydrological impacts) and corresponding requirements of the OWC application, coordinated assessments will be undertaken. This approach ensures that the environmental information submitted on behalf of the Proposed Development is consistent. Where co-ordinated assessments have been undertaken and utilised as part of the EIA, these will be reported in the ES.

## Co-ordination with Habitats Regulation Assessment

- 2.71 Regulation 27 of the EIA Regulations states:
- ‘Where in relation to EIA development there is, in addition to the requirement for an EIA to be carried out in accordance with these Regulations, also a requirement to carry out a Habitats Regulation Assessment, the relevant planning authority or the Secretary of State, as the case may be, must, where appropriate, ensure that the Habitats Regulation Assessment and the EIA are co-ordinated’.*
- 2.72 A shadow Habitat Regulation Assessment (sHRA) will be submitted as an appendix to the forthcoming Biodiversity chapter to demonstrate that the Proposed Development will not affect the integrity of the following internationally designated sites within 10km of the Site. These are:
- The Mens Special Area of Conservation (SAC) located approximately 6.5km west of the Site designated for the Annex I habitat (Atlantic acidophilous beech forests) and Barbastelle bats *Barbastella barbastellus* as the sole qualifying species; and
  - Ebernoe Common SAC located approximately 6.6 to 12km west of the Site which is designated for Barbastelle and Bechstein’s bats *Myotis bechsteinii*.

2.73 Due to the Proposed Development undergoing continual design evolution within the parameters set out in **Chapter 4**, a precautionary approach is being undertaken for the purpose of the EIA and sHRA until further detailed information is available. With that said, the sHRA and EIA will provide further assessment on the following pressures that may affect the sensitive habitats and bat populations within these designations:

- Habitat disturbance or fragmentation;
- Recreational pressure;
- Loss of functionally linked land;
- Disturbance to wildlife due to noise, lighting and human activity;
- Introduction of invasive species;
- Changes to local hydrology and water pollution; and
- Land use change (Ebernoe Common SAC only).

2.74 The EIA and HRA processes will be coordinated in relation to:

- Baseline data collection, specifically surveys that have been ongoing within the Site (further details are provided in **Chapter 9**);
- Scope - The pressures identified above being considered holistically at the receptor level in **Chapter 9**;
- Consultation - Consultation between the EIA and HRA process will be coordinated with Natural England;
- Assessment - In terms of the approach and methodology for the impacts considered in **Chapter 9**; and
- Mitigation development – Any mitigation required for the sHRA process will be aligned with the EIA process.
- Cumulative Assessment – Assessment of cumulative effects within the SHRA will align with the Cumulative Projects considered within the EIA (as identified in **Chapter 15**), unless other specific requirements are defined by Natural England.

2.75 It is highly likely that prior to the preparation of the ES, many of the above pressures and associate effects will be further understood and concluded as unlikely to be significant. This will be clearly reported in the ES.

## 3. Site Context

### Overview

- 3.1 This Chapter summarises the location of the Site and its wider setting. Technical baseline information is provided in **Chapter 5** (for those topics for which no likely significant effects are identified) and in **Technical Chapters 6 – 14** (for those technical topics for which likely significant effects have been identified).

### Site Location and Existing Land Uses

- 3.2 The Site is approximately 106.29 ha and located within the Horsham District of West Sussex, to the west of Billingshurst. The local authority for the Site is HDC.
- 3.3 The Site consists primarily of agricultural land with tree-lined hedgerows, along with sports pitches, buildings, an electrical substation and highway land. Three Public Right of Way (PRoW) pathways cross the Site, including: BIL 1327 (west to east); BIL 1326 (north west to south west); and BIL 1335 (north to south).
- 3.4 The Site is bordered by:
- Agricultural land to the north and Pratt’s Copse and Eaton Copse to the north west;
  - The A29 (Stane Street and Billingshurst Bypass) and the village of Billingshurst to the east;
  - Agricultural land and several residential properties off Newbridge Road to the south;
  - Several residential properties off Lordings Road, agricultural land, the A272 (Newbridge Road), Rowner Road and the River Arun to the west.
- 3.5 The existing surrounding land uses are primarily agricultural, extending to the north, west and south of the Site as well as east of Billingshurst village. Tedfold Cottage Farm is located approximately 200m north west of the Site. The A29 and A272 intersect at Platts Roundabout located to the east. The A29 continues south to Bognor Regis and north to Beare Green. The A272 continues west to Winchester and east to Hadlow Down.

### Future Land Uses

- 3.6 Adjacent to the east of the Site, 4,627sqm of employment space has been approved for development on a 1.7ha parcel of land<sup>12</sup>.

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<sup>12</sup> HDC planning application reference DC/22/0518.

## 4. High Level Development Specification

### Boundary and Built Development Areas

- 4.1 All temporary and permanent works will take place within the boundary shown on **Figure 1.1**. This boundary shows the area within which planning permission will be sought and includes all temporary and permanent works associated with the Proposed Development. **Figure 1.1** also defines the maximum spatial area within which buildings will be erected (referred to as the 'Built Development Area')<sup>13</sup>.

### Overview of Site Preparation

#### Construction Access and Movements

- 4.2 Construction access, routing and movements will be agreed with HDC prior to construction as part of a CEMP. Construction access in the first instance will be obtained from the A272 and Newbridge Road via new access points that will be created early in the construction stage and then be used as primary construction access before becoming the permanent access points for the operational stage. It is anticipated that construction vehicles will arrive/depart via the A272 before dispersing north/south<sup>14</sup> and movement through Billingshurst will be prohibited.

#### Site Securement

- 4.3 It is assumed that temporary fencing and hoarding will be erected around the perimeter of each development area under construction. Appropriate alternative routes will be provided for vehicles, pedestrians and cyclists where the closure of existing routes (including roads, footways and PRowS) is needed to facilitate the works.
- 4.4 Temporary secure access gates will be provided to manage the movement of vehicles, plant, equipment and personnel required for construction. Welfare facilities and other temporary infrastructure (e.g. construction compound(s), material laydown, storage areas, etc.) will be set up at a designated location within the Site, as determined by the appointed contractor. Where required, smaller satellite compounds will be provided around the Site, as required.

#### Utilities

- 4.5 Local excavation and trenching works will be required to install services, drainage runs and foundations for structures. It is assumed that all the necessary diversion and capacity upgrades (if required) would be undertaken by the relevant district network operator (or their appointed contractor).
- 4.6 The 400kV overhead powerline (OHL) will be retained on its current south east to north west trajectory with statutory stand-off distances to built development implemented (60m total – 30m each side) to ensure appropriate ongoing operational maintenance. Other non-structural development may, however, occur within this area such as SuDS,

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<sup>13</sup> Demarcation relates solely to buildings (built development) and excludes non-structural or ancillary development including but not limited to features such as floodlighting, tracks, street furniture (e.g. benches), structures associated with sports pitches (e.g. fencing, seating, groundsman huts, storage units etc), utilities infrastructure, hardstanding, SuDS infrastructure, access paths and car parks.

<sup>14</sup> To be agreed with HDC.

internal roads and green infrastructure. During construction, safe working methods will be implemented and included in the CEMP. This will include adherence to relevant health and safety legislation including GS6 Avoiding danger from overhead lines<sup>15</sup>, and ensuring construction workers are briefed on the appropriate methods of working and the easements

#### **Diversions**

- 4.7 There are multiple Public Right of Way (PRoW) crossing through the Site, including: BIL 1327 (west to east); BIL 1326 (north west to south west); and BIL 1335 (north to south) that have the potential to be affected by the construction of the Proposed Development. As a worst-case assumption, the PRoWs may be temporarily closed or diverted during construction until a time where they are permanently reopened. If continued use is deemed appropriate during construction, routes will be protected by fencing/ hoarding to allow for safe continued access.

#### **Earthworks**

- 4.8 The Built Development Areas primarily comprises of multiple arable fields, the majority of which will be cleared at the outset of the construction stage to create development plateaus. To achieve appropriate development plateau levels, it is anticipated that there will be areas of both cut (where ground levels are reduced) and fill (where ground levels are increased). At this stage, it is uncertain whether a broad cut-and-fill balance will be achieved across the Site, and it is anticipated that level changes could be up to +4m / -4m compared with existing ground levels. Appropriate soil handling measures will be applied throughout construction that will be controlled by a Soil Management Plan (SMP). Boundary trees and hedgerows will also be subject to removal where it is required for access and infrastructure. Features outside the Built Development Areas will be retained and adequately protected during construction.

#### **Demolition**

- 4.9 The existing buildings occupied on Site will cease use and be subject to demolition and clearance prior to construction.

#### **Ground Conditions and Remediation**

- 4.10 Ground investigation(s) will be undertaken to determine the absence/presence, type and distribution of any forms of ground contamination. A desk top study (**Appendix 5.2**) has been completed for the Site and given the existing uses on Site (primarily agricultural), unusually complex contamination is considered unlikely. Potential sources of contamination identified include the potential for localised Made Ground in the vicinity of former farm buildings and associated ground gas from this Made Ground and poly chlorinated biphenyls (PCB's), heavy metals and oils from the electrical substation in the centre east of the Site. Ground investigation(s) will determine the presence/absence of contamination (and its nature and extent, if present) and therefore the requirements for any remediation prior to the construction activities. If required, a remediation scheme(s) will be submitted and agreed with HDC in advance of works taking place. This will also identify the requirement for any construction-specific method statements.

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<sup>15</sup> HSE (2013) GS6 Avoiding danger from overhead lines.

### **Groundwater**

- 4.11 Groundwater monitoring undertaken on Site (**Appendix 5.3** and **5.4**) recorded levels between January and April 2025, with the shallowest groundwater encountered between ground level and 0.75 mbgl. Consequently, pumping of excavations or dewatering may be required during the proposed groundworks. These activities will be managed and detailed within a construction-specific method statement. It is anticipated that any pumped water will be discharged in a controlled manner to the public sewer (subject to the appropriate Southern Water consent) following primary treatment, including the removal of large solids, oils, and grease where necessary.

### **Construction Waste**

- 4.12 The Proposed Development would generate waste during the construction stage, including, for example: bricks, glass, gypsum, aggregate, concrete, wood and plastic. This waste will be managed through the production of an outline Site Waste Management Plan (SWMP) as part of a CEMP.

### **Construction Drainage**

- 4.13 Temporary surface water drainage will be installed and maintained to mitigate flood risk and sediment loading in line with practice guidance such as CIRIA's Control of water pollution from construction sites<sup>16</sup>.

### **Foundations**

- 4.14 Information regarding foundations has not yet been finalised and will be subject to final building design and investigation of underlying ground conditions. Nevertheless, it is anticipated that shallow foundations are appropriate for development on-site, but the requirement for piled foundations cannot be ruled out at this stage.

### **Lighting**

- 4.15 Construction compound lighting will be temporary, used only during winter when natural light levels are insufficient for safe working. All lighting will be designed to minimise spill beyond the boundary of the site compounds, which will move as construction progresses but remain within the Site. Best-practice measures in accordance with ILP GN01/21 will be applied, including designing compound lighting to meet the E3 post-curfew maximum vertical illuminance criterion of 2 lux at nearby vertical receptors.

### **Regulatory Compliance**

- 4.16 All construction works will be undertaken in line with the requirements set out in the Construction (Design and Management) Regulations 2015<sup>17</sup> and appropriate levels of security (e.g. personnel / CCTV) will be provided.

### **Working Hours**

- 4.17 Construction working hours would be 08:00 to 18:00 Mondays to Fridays; 09:00 to 13:00 on Saturday; and it is anticipated that there will be no construction on Sundays or Bank Holidays. Some quiet works may be undertaken outside of these hours if agreed with HDC.

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<sup>16</sup> CIRIA (2001) Control of water pollution from construction sites. Guidance for consultants and contractors (C532).

<sup>17</sup> Construction (Design and Management) Regulations 2015.

## **Development Principles**

### **Land Use and Quantum**

4.18 The Proposed Development is for:

- Up to 1,100 residential dwellings across the Site (Use Class C3);
- 2 Form Entry (2FE) Primary School (up to 420 pupils) (including Pre-School / Special needs provision) (Use Class F1);
- Retail space (c. 25,000 ft<sup>2</sup> (2,323 m<sup>2</sup>) Gross Internal Area (GIA)) (Use Class E(a));
- Care / Later Living Accommodation / Elderly Provision (up to 80 beds)(Class C2 / C3);
- Community Centre (use Class F2(b));
- Provision of Sports Facilities including: Tennis centre and tennis courts (indoor & outdoor); Multi Use Game Area (MUGA); football facilities (Use Class E(d), F2, Sui Generis).
- Traveller site;
- Country Park;
- Landscaping and ecological enhancements;
- Access; and
- Public Open Space.

### **Heights**

4.19 The maximum height within the Built Development Areas on Site will be up to 3 storeys and approximately 11m from finished floor levels (FFL) to ridge height (max of 15m including maximum ground changes outlined above).

### **Access**

4.20 Three new accesses will provide access/egress into the Site. This includes:

- Northern Parcel Access – Involves the adaptation of the existing A29 / New Road / Hilland Farm 4-arm roundabout to provide a 5<sup>th</sup> arm on its western side serving the Proposed Development.
- Southern Parcels Access – A new roundabout junction on the A272 to serve the two parcels to the south of the Proposed Development.
- Care Provision / Later Living Access – The provision of a simple priority junction on Newbridge Road. Vehicles would then access wider network via the existing Newbridge Road / A29 priority junction.

- 4.21 These junctions will connect to the internal road network of secondary and tertiary roads that will lead to the proposed uses and will provide access for cars/vans, emergency vehicles, service and refuse vehicles. The current access off the A272 that serves the Billingshurst Recycle Centre and Jubilee Sports Pavilion will be retained on its current alignment.

#### **Parking**

- 4.22 Car parking will be provided as part of the Proposed Development in line with HDC and West Sussex District Council (WSDC) guidance.

#### **Pedestrian / Cycle Connections**

- 4.23 The Proposed Development will incorporate new pedestrian and cycle access routes that will provide both access between development parcels as well as wider connectivity across the A272 to local amenities, including the local centre and the railway station. It is envisaged that all three PRowS's that cross the Site will be retained on their current alignment as part of the Proposed Development.

#### **Water Management**

- 4.24 The Proposed Development will include SuDS features which will manage surface water and be designed to manage run off to greenfield rates (including appropriate allowances for climate change of 45%) and not increase flood risk off Site. The new design will manage and direct runoff to suitable discharge points and include areas of attenuation to store excess flows during times of heightened rainfall. Based on existing geology, infiltration measures are not feasible across Site. New ditches will be introduced across the Site as necessary to assist in moving groundwater that has broken the surface, whilst the maintenance of existing ditches will also be increased as part of their management and maintenance schemes.

- 4.25 All infrastructure classified as 'more vulnerable' will be located outside of areas highlighted as being within Flood Risk Zone 2 or 3 as defined on EA Flood Maps.

#### **Foul Water Management**

- 4.26 At this stage, it is anticipated that foul water will discharge to the Billingshurst WwTW located approximately 1km south of the Site. The discharge method is likely to be pumped from multiple stations across the Site, although connection locations and flow rates are to be agreed with Southern Water.

#### **Potable Water**

- 4.27 The Proposed Development will be designed to comply with Building regulations Part G Optional Technical Standard of 110 litres per person per day (l/p/d) as required by Policy 37 of the Horsham District Planning Framework.

#### **Realignment of Watercourse**

- 4.28 A single watercourse in the north of the Site is likely to require realignment to open up the area around the ditch by providing a more 'winding' route of the watercourse to provide more ecological benefits. No changes to its flow or capacity are proposed, and works will be subject to Ordinary Watercourse Consent.

### **Waste Management**

- 4.29 Waste streams generated by the Proposed Development during operation will include residential/commercial and green waste. The Proposed Development will include appropriate facilities for the storage, handling and collection of these waste types.
- 4.30 Waste will be managed through the implementation of an Operational Waste Management Plan (OWMP) that will set out measures for waste storage, collection, recycling and reuse and disposal in compliance with the required standards, set out in the HDC Household Waste Collection Policy and the relevant Local Plan policies of HDC and WSCC as the local collection and disposal authorities.

### **Landscaping Strategy**

- 4.31 The Proposed Development will include a Country Park located in the north-western part of the Site. This area will incorporate a range of biodiversity enhancements, such as Sustainable Drainage Systems (SuDS), wetland habitats, wildflower meadows, and woodland planting. It will also provide recreational opportunities for future users, including walking and cycling routes. Across the remainder of the Site, the Proposed Development will retain and enhance existing high-value ecological habitats, alongside the provision of public open space (POS), play areas, and additional hedgerow, tree, orchard and woodland planting.

### **Lighting Strategy**

- 4.32 New lighting will be installed at the site access, along internal routes, within parking and servicing areas associated with the commercial uses, and around pedestrian pathways where required. Sports pitch provision will also include floodlighting, that will include the erection of new floodlights associated with the new Billingshurst 1<sup>st</sup> team football pitch that will be subject to operational standards/requirements and final specifications. All future lighting installations will be designed to achieve no more than 10 lux spillage (pre-curfew) and 2 Lux spillage (post curfew), in accordance with GN01, at nearby existing or proposed facades of dwellings. They will also be designed to achieve 0 (or 'near zero') upward light ratio.
- 4.33 A sensitive lighting design will be delivered (dark corridors and low glare fittings) to avoid disturbance to bats and other light sensitive fauna.

### **Noise Strategy**

- 4.34 There is a minimum of either the A29, the A272 or a 100m distance between the proposed school, community hub, sports facilities and commercial elements and existing residents. There will also be a minimum of either a 10m internal road or a 10m distance between these noise sources and proposed future residential dwellings.

### **Operational Hours**

- 4.35 The residential and care provision / later living elements of the Proposed Development will be operational 24/7 and 365 days a year due to its nature.
- 4.36 The primary school opening hours are yet to be confirmed; however, it is expected to operate within standard hours for local schools. Core hours are anticipated to be Monday to Friday, from approximately 7:30 AM to 4:00 PM, with occasional after school activities taking place outside of these times.

- 4.37 The opening hours for the retail provision are yet to be confirmed. However, it is anticipated that they will broadly reflect the operating hours of comparable local facilities. Community-use opening hours are also expected to be flexible and will depend on the services provided, with final details still to be confirmed. For the purposes of EIA Scoping, and to ensure a robust worst-case assessment, both uses are currently assumed to operate 24 hours per day.

#### **Timescales**

- 4.38 Construction is anticipated to commence on Site in 2027, subject to gaining planning permission. The Proposed Development will be delivered in a phased manner and, whilst subject to market demand, completion and occupation is anticipated in 2037.

## 5. Technical Topics which are Not Significant

### Introduction

- 5.1 As part of the EIA process and based on the information available to date, there are several technical topics for which a further detailed assessment as part of the EIA is not justified and it is therefore proposed that these topics (and related effects) will not be reported within the ES (i.e., 'scoped out'), as they are not considered likely to have the potential to be significant.
- 5.2 The technical topics for which no likely significant environmental effects have been identified are:
- Agricultural Land and Soil Resources;
  - Ground Conditions and Contamination;
  - Lighting;
  - Major Accidents and/or Disasters;
  - Minerals; and
  - Waste.
- 5.3 The technical topics listed above are considered in turn below in this Chapter, with a factual evidence base provided. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.
- 5.4 The other technical topics outlined within this EIA Scoping Report also identify effects that are not likely to be significant. These are reported in **Technical Chapters 6 – 14**.

### Agricultural Land and Soil Resources

#### Technical Baseline

- 5.5 Land quality in England and Wales is measured under the Agricultural Land Classification (ALC), devised by the Ministry of Agriculture, Fisheries and Food (MAFF) in the late 1960s. "Provisional" maps were published between 1967 and 1974<sup>18</sup>. The ALC methodology was amended in 1976, when Grade 3 was divided into subgrades, and was more extensively amended in 1988, but the provisional ALC plans have not been updated. They have, however, been digitised by Natural England. In December 2025, the ALC Guidelines were further updated<sup>19</sup>, but the update has not altered the

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<sup>18</sup> MAFF, 1:250,000 Provisional Agricultural Land Classification of England and Wales: London and the South East, reprinted by Natural England 2010.

<sup>19</sup> Defra, Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land, updated 2025.

main principles or climate data used, and all post-1988 ALC surveys therefore remain valid.

- 5.6 Land is graded into five grades (Grade 1–5), with Grade 3 divided into Subgrades of 3a and 3b. Land of Grades 1, 2 and 3a is defined in the National Planning Policy Framework (2024)<sup>20</sup> as Best and Most Versatile quality (BMV). This is the most productive or most flexible land, and accounts for an estimated 42% of agricultural land in England<sup>21</sup>. Grades 3b, 4, and 5 are used to classify land that is of Moderate quality to Very Poor quality. In 2017, Natural England produced maps showing the likelihood of BMV, dividing the country into low (<20% area BMV), moderate (20–60% area BMV) and high (>60% area BMV)<sup>22</sup> likelihood areas.
- 5.7 The Site extends to 106.29ha and is primarily a mix of agricultural land (in grassland and arable uses), and non-agricultural land which includes: sports pitches, woodland, buildings, and highway land.
- 5.8 The northeastern part of the Site includes two large arable fields. The southwestern part of the Site includes all or part of four arable fields, and grassland at the western edge adjacent to the river. Grassland to the south of the fuel station appears not to be in farming use at present.
- 5.9 **Figure 5.1** provides the provisional ALC map for the general area, taken from the maps digitised by Natural England in 2020<sup>23</sup>. The provisional map shows that most of the Site is undifferentiated Grade 3 (good to moderate quality agricultural land), with land at the western edge near the river as Grade 4 poor quality.
- 5.10 **Figure 5.2** provides an extract from the 1:250,000 Likelihood of BMV maps<sup>24</sup>. The Site is shown as mostly comprising land expected to have a low likelihood of BMV (i.e. <20% of the area will be BMV), but with an area of high likelihood in the central/western part of the Site (where >60% of the area is likely to be BMV).
- 5.11 A very small part of the Site has been surveyed in the past by MAFF, north of Newbridge Road. The survey was carried out by MAFF in 1993 as part of the Billingham Planning Strategy. The results are now shown on the digitised record on MAGIC<sup>25</sup>. The available detailed ALC results are provided in **Figure 5.3**. The very small part of the Site that has already been surveyed was classified as Subgrade 3b “moderate” quality agricultural land, which is not BMV quality. Much of the rest of the land surveyed at that time was also Subgrade 3b.
- 5.12 A detailed ALC<sup>26</sup> survey (**Appendix 5.1**) has been carried out of the whole of the Site. The results are shown in *Appendix 6* of **Appendix 5.1**. The ALC has identified that all of the agricultural land within the Site falls into ALC subgrade 3b “moderate” quality

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<sup>20</sup> MHCLG, National Planning Policy Framework, December 2024.

<sup>21</sup> Natural England, TIN049 “Protecting the best and most versatile agricultural land”, v2, 2012.

<sup>22</sup> Natural England, 1:250,000 Likelihood of Best and Most Versatile (BMV) Agricultural Land, 2017.

<sup>23</sup> It is not possible to plot the Site boundary accurately on this map and, as such, the map is not suitable for site-specific use anyway.

<sup>24</sup> It is not possible to mark the Site boundary accurately on this map.

<sup>25</sup> Results available at [www.magic.gov.uk](http://www.magic.gov.uk).

<sup>26</sup> Defra, Agricultural Land Classification of England and Wales: guidelines for assessing the quality of agricultural land, updated 2025

agricultural land. Parts of the Site fall into various non-agricultural classifications. None of the Site is of BMV quality.

- 5.13 The results of the ALC are set out in Table 1 below.

**Table 5.1: ALC Survey Results**

| ALC Grade                         | Area (ha) <sup>27</sup> | Proportion (%) |
|-----------------------------------|-------------------------|----------------|
| 3b Moderate                       | 83.6                    | 86             |
| Woodland                          | 3.1                     | 3              |
| Non-agricultural (sports pitches) | 9.8                     | 10             |
| Urban                             | 0.7                     | 1              |
| <b>Total</b>                      | <b>97.2</b>             | <b>100</b>     |

- 5.14 The soils are shown on the 1:250,000 Soils of England and Wales: Sheet 6 South East England<sup>28</sup> as mostly 711i WICKHAM 5 association soils, described as seasonally waterlogged, fine loamy over clayey soils, and some coarse loamy soils. At the western edge, associated with the watercourse, a narrow strip of 573a WATERSTOCK association soils are shown, being fine loamy soils variably affected by groundwater.
- 5.15 Soils were examined as part of the detailed ALC survey. The soils were all found to comprise sandy silty loam, silty clay loam or clay loam topsoils over an upper subsoil of sandy silty loam, silty clay loam, clay loam or clay.

***Loss of Agricultural Land***

- 5.16 Detailed ALC survey has identified that there is no agricultural land of BMV quality within the Site. All the agricultural land has been classified under the ALC as subgrade 3b. Planning policy in the NPPF<sup>29</sup> paragraph 187 notes that the economic and other benefits of BMV land should be recognised, but it does not require that for non-BMV land.
- 5.17 Footnote 65 to paragraph 188 of the NPPF notes that, where significant development of agricultural land is necessary, poorer quality land should be used in preference. The Site comprises poorer quality land. Therefore, there will be no adverse impact on land of BMV quality.
- 5.18 Therefore, the loss of agricultural land is not considered to be significant and will not be considered further in the EIA or reported in the ES.

<sup>27</sup> This area does not cover the entire Site as it was based off a previous boundary, but this does not make a material difference to the assessment.

<sup>28</sup> Soil Survey of England and Wales, 1983.

<sup>29</sup> MHCLG, National Planning Policy Framework, December 2024

#### ***Loss of Soils or Reduction in Soil Quality***

- 5.19 The soils across the Site comprise seasonally waterlogged sandy and silty clay loams. Such soils are not considered to be of high sensitivity or rarity and are moderately resilient to structural damage when moved.
- 5.20 At this stage, it is assumed that a broad cut-and-fill balance will be achieved across the Site and therefore there will be the requirement for movement of soil resources within the Site. Appropriate handling measures will be employed during construction, and these are commonly and successfully implemented in the construction industry. This will be controlled as part of a Soil Management Plan (SMP) (secured within the CEMP).
- 5.21 Based on the quantum of soils affected and their characteristics, the loss or reduction in the quality of soil resources will be limited or/and controlled.
- 5.22 Therefore, the loss of soils or reduction in quality of soils is not considered to be significant and will not be considered further in the EIA or reported in the ES.

#### ***Reduction in farmable area and business viability***

- 5.23 Agricultural land within the Site comprises a mix of arable and grazing land. It is currently farmed by a single third-party farmer whose wider farmland extends south of the Site and into the surrounding region, operating collaboratively with other local farmers. Although their overall farmable area will be reduced, the anticipated reduction as a result of the Proposed Development is a relatively small percentage, and they have confirmed that any changes to the financial and operational arrangements for landowners and local farmers would not render the business unviable. Therefore, a reduction in farmable area and farm business viability is not significant and will not be considered further in the EIA or reported in the ES.

### **Ground Conditions and Contamination**

#### **Technical Baseline**

- 5.24 Ground Condition Consultants Ltd (GCC) prepared a Ground Condition Desk Top Study (**Appendix 5.2**) for the Site in March 2025, which provides further details on the baseline conditions of the Site and the preliminary risk assessment of land contamination, in line with the Environment Agency Land Contamination Risk Management<sup>30</sup> (LCRM) guidance. Site investigation and subsequent remediation, if required, have not yet been undertaken to further assess or remediate the contamination risks.
- 5.25 However, groundwater monitoring wells were installed by GCC in January 2025 and were monitored until April 2025. The results of the groundwater monitoring were presented in a letter report (**Appendix 5.3**) in April 2025, and monitoring was resumed in October 2025 through to December 2025. The updated groundwater data were presented in a letter report in December 2025 (**Appendix 5.4**).
- 5.26 The baseline conditions have therefore been based on the Desk Top Study, the ground conditions shown by the installation of the monitoring wells and the groundwater level

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<sup>30</sup> Environment Agency (October 2020, updated June 2025) Land Contamination Risk Management

monitoring data obtained to date. The key features associated with the current and former Site uses are shown on *Figure 2* of the GCC Desk Top Study (**Appendix 5.2**).

- 5.27 Reference to the British Geological Survey (BGS) Map extracts presented in the Groundsure report commissioned for and included as an appendix within the Desk Top Study (**Appendix 5.2**) indicates the majority of Site/surrounding area to directly overlie the bedrock geology of the Weald Clay Formation (mudstone and sandstone). The western-most areas of the Site are shown to overlie superficial Alluvial Deposits (clay, silt, sand and gravel) and Arun Terrace Deposits (sand and gravel) over the Weald Clay Formation (mudstone and sandstone). The monitoring well installation works, which comprised 10 windowless sample boreholes to depths of up to 5.0m below ground level, encountered topsoil over clay with occasional localised sand bands (Weald Clay Formation).
- 5.28 The Environment Agency Groundwater Vulnerability Map extracts indicate areas of the Site to be underlain by Secondary A Aquifers, interpreted as the Alluvial Deposits and Arun Terrace Deposits (western parts) and also the Weald Clay Formation (sandstone). The Weald Clay Formation (mudstone) is identified as an Unproductive Stratum. Groundwater levels recorded between January and April 2025 recorded the shallowest groundwater levels to be between ground level and 0.75mbgl. This is interpreted to represent a combination of accumulation of groundwater in the monitoring wells that was not able to escape, due to low permeability clay, and saturation of the localised sand bands. There were no clear geographical trends associated with the groundwater levels.
- 5.29 Numerous drainage ditches cross and bound the various land parcels, including a culverted watercourse beneath one of the fields towards the centre of the site (see *Figure 1 – Appendix 5.2*). The River Arun is located to the west of the Site. Most of the drainage ditches and watercourses crossing and adjoining the Site are part of the Arun catchment and ultimately feed into the River Arun Site of Special Scientific Interest (SSSI).
- 5.30 No potentially notable sources of land contamination have been identified in relation to the majority of the Site. The potential sources of contamination identified by the GCC Desk Top Study are:
- Potential for localised reduced quality Made Ground to be present in vicinity of the former farm buildings (see *Figure 1 - Appendix 5.2*), access tracks, field access points and former residential property, including asbestos, from the demolition of the former buildings and use of the Site as a farm. Due to the age of the former structures, there is a potential for asbestos to be present;
  - Potential for ground gas generation from localised potential Made Ground, particularly in the vicinity of the former farm buildings. No landfills have been identified on or within 250m of the Site; and
  - Potential for polychlorinated biphenyls (PCBs), heavy metals and mineral oils from transformer oil from the electrical substation in the centre east of the Site.

- 5.31 A service/fuel station is located at Platts Roundabout, adjacent to the east of the Site. This services station has been recently constructed and is therefore considered to have been constructed with modern pollution control measures and is therefore not considered to represent a notable potential source of contamination with regard to the Site.
- 5.32 Natural ground stability hazards at the Site include volume change potential in the Weald Clay, running sand in the superficial deposits in the far west of the Site, compressible superficial deposits in the far west of the Site and a highly localised potential for landslide hazard in the southwest of the Site.
- 5.33 A Preliminary UXO Risk Assessment (**Appendix 5.5**<sup>31</sup>) commissioned for the Site identified multiple recorded Allied defensive features in very close proximity to the Site, this is coupled with a Prisoner of War camp and Explosive Ordnance Clearance (EOC) task in proximity. Further details of the locations of these features were not presented in the Preliminary UXO Risk Assessment.
- 5.34 A Detailed UXO Risk Assessment (**Appendix 5.6**)<sup>32</sup> was therefore commissioned to follow up on the findings of the Preliminary Assessment. The Detailed Assessment reviewed the available data in more detail and concluded that the potential presence of UXO on the Site presents a low risk with regard to the Proposed Development.

***Risk to human health from existing on-site soil contamination during operation***

- 5.35 No potentially notable sources of contamination have been identified with regard to the majority of the Site. However, localised potential sources of contamination have been identified in relation to former farm buildings, access tracks, field access points, former residential properties and an electrical substation (see *Figure 1 – Appendix 5.2*).
- 5.36 Due to the predominance of low permeability clay geology beneath the Site, contaminants entering the ground are anticipated to remain localised to the given primary source area with limited potential for migration.
- 5.37 The assessment of risks associated with contamination with regard to proposed developments are routinely controlled under the planning regime by planning conditions. Such planning conditions will require an investigation and assessment process that follows the EA Land Contamination Risk Management (LCRM) guidance<sup>33</sup>. The planning conditions of the Application will include the intrusive investigation and assessment of the potential contamination source areas, identification of any unacceptable risks, a remediation strategy to address the unacceptable risks and verification to confirm the effective implementation of the remediation strategy.

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<sup>31</sup> The boundary in **Appendix 5.5** differs slightly from the finalised Site boundary but this makes no material difference to the assessment.

<sup>32</sup> RMS UXO (November 2025) Detailed Unexploded Ordnance (UXO) Risk Assessment. Ref: INO6067. The boundary in **Appendix 5.6** differs slightly from the finalized Site boundary but this makes no material difference to the assessment.

<sup>33</sup> Environment Agency's Land Contamination Risk Management (LCRM) guidance. Available at: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

- 5.38 It is considered that the exposure to the potential forms of existing localised contamination that may be present on-Site, such as asbestos containing materials, heavy metals and fuel hydrocarbons (if found during intrusive investigations), will be effectively remediated with measures such as source removal and cover systems, under the planning conditions. These tertiary mitigation measures, if required, are considered an integral part of the Proposed Development. No unusual or widespread contamination is anticipated on or in the vicinity of the Site.
- 5.39 Therefore, risk to human health from existing on-site soil contamination to future site users is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Risk to human health and on-site surface watercourses from existing on-site and construction related soil contamination during construction***

- 5.40 As outlined above, the planning conditions will include the intrusive investigation and assessment of the potential contamination source areas, identification of any unacceptable risks. These intrusive investigations will be undertaken to inform the risk assessment with regard to construction workers. The risks to construction workers from existing contamination in the soil are typically lower than to future site users as the assessment criteria for future users are typically based on risks to young children, who are more sensitive to contaminants than adults.
- 5.41 It is considered that the exposure of construction workers to the potential forms of localised contamination that may be present on the Site, such as asbestos containing materials, heavy metals and fuel hydrocarbons (if found during intrusive investigation), will be effectively controlled as part of the CEMP with measures such as dust suppression, good hygiene and PPE, in line with the Health and Safety at Work etc. Act 1974<sup>34</sup> and Control of Substances Hazardous to Health (COSHH) Regulations 2002<sup>35</sup>. The CEMP will also include pollution prevention control measures, in accordance with PPG6<sup>36</sup>, to prevent pollution from construction activities. These tertiary mitigation measures would be considered an integral part of the Proposed Development.
- 5.42 The assessment of risks associated with contamination with regard to controlled waters are routinely controlled under the planning regime by planning conditions. Such planning conditions will require an investigation and assessment process that follows the EA LCRM guidance. The planning conditions of the Application will include the intrusive investigation and assessment of the potential contamination source areas, identification of any unacceptable risks, a remediation strategy to address the unacceptable risks and verification to confirm the effective implementation of the remediation strategy.
- 5.43 It is considered that the exposure to the potential forms of localised contamination that may be present on the Site, such as heavy metals and fuel hydrocarbons, can be effectively remediated with measures such as source removal, under the planning conditions. CEMP will also include pollution prevention control measures, in

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<sup>34</sup> Health and Safety at Work etc. Act 1974

<sup>35</sup> COSHH (Control of Substances Hazardous to Health) Regulations 2002

<sup>36</sup> Environment Agency (2012). Working at construction and demolition sites: PPG6 Pollution Prevention Guidelines

accordance with PPG6<sup>37</sup>, to prevent pollution from construction activities entering the watercourses. These tertiary mitigation measures would be considered an integral part of the Proposed Development and will be covered by a Remediation Strategy, which will require approval under the planning conditions, and the CEMP. No unusual or widespread contamination is anticipated on or in the vicinity of the Site.

- 5.44 Therefore, risk from on-site soil contamination to human health and surface watercourses is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Risk to human health from ground gas generation during construction and operation***

- 5.45 No landfills or other likely sources of notable ground gas generation have been confirmed to be present in the vicinity of the Site. However, there remains a potential for localised thick deposits to be present on-Site in association with the former farm and residential buildings and from unmarked infilled pits.
- 5.46 Due to the predominance of low permeability clay geology beneath the Site, ground gas is not considered likely to migrate far laterally from the generation source, but may migrate vertically to buildings or other enclosed spaces located over such sources.
- 5.47 The assessment of risks associated with contamination with regard to proposed developments are routinely controlled under the planning regime by planning conditions. Such planning conditions will require an investigation and assessment process that follows the EA LCRM guidance. The planning conditions of the Application will include the intrusive investigation and assessment of the potential contamination source areas, identification of any unacceptable risks, a remediation strategy to address the unacceptable risks and verification to confirm the effective implementation of the remediation strategy.
- 5.48 It is considered that the exposure to ground gas, if present, will be effectively remediated with measures such as source removal and gas protection measures, in line with BS 8485 2015<sup>38</sup>, in buildings and other enclosed spaces, under the planning conditions, and the control of access to confined spaces and excavations during construction, under the CEMP. These tertiary mitigation measures, if required, are considered an integral part of the Proposed Development.
- 5.49 Therefore, risk from ground gas generation to future site users, buildings and construction workers is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Natural ground stability hazards during operation***

- 5.50 Natural ground stability hazards at the Site include volume change potential in the Weald Clay, running sand in the superficial deposits in the far west of the Site, compressible superficial deposits in the far west of the Site and a highly localised potential for landslide hazard in the southwest of the Site.

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<sup>37</sup> Environment Agency (2012). Working at construction and demolition sites: PPG6 Pollution Prevention Guidelines

<sup>38</sup> BS 8485:2015+A1:2019. Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings. British Standards Institution (BSI), Published June 2015, amended January 2019.

- 5.51 The far west of the Site, where the above potential constraints have been identified, is to comprise a country park with limited built development. The risks associated with running sand, which is typically a buildability issue, and compressible deposits are therefore not anticipated to apply to the built development areas of the Site, but will be considered in relation to any localised structures within the Country Park area (e.g. access tracks).
- 5.52 The built development areas of the Site will be subject to intrusive investigations to assess the volume change potential and other characteristics of the soil on-Site to inform the foundations designs for the proposed structures. No unusual ground conditions are anticipated in relation to the foundation designs for the Proposed Development. Foundation design will be controlled by Building Control and by warranty providers, such as the National House Building Council (NHBC).
- 5.53 Therefore, natural ground stability risks to proposed buildings and infrastructure are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Unexploded ordnance (UXO) risks during construction and operation***

- 5.54 A Detailed UXO Risk Assessment (**Appendix 5.6**) completed for the Site has concluded that unexploded ordnance presents a low risk with regard to the Proposed Development. The risks associated with UXO are primarily related to construction workers, particularly those who will be undertaking ground works, with a much lower risk to future site users, who will generally be in contact with shallow soils and soils that have already been worked as part of the construction activities.
- 5.55 The Detailed UXO Risk Assessment recommends a safety awareness briefing and a Site-Specific Emergency Response Plan. These tertiary mitigation measures will be implemented as part of the CEMP.
- 5.56 Therefore, UXO risk to future users and construction workers is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Cut and fill soil movements, stockpiling and dewatering during construction***

- 5.57 The Site will be subject to a nominal cut and fill exercise to provide a flat development platform across the Site. The cut and fill will involve the stripping of the topsoil and soils from across development areas of the Site and is anticipated to be stored in stockpiles.
- 5.58 During the ground works, the following controls shall be implemented by the groundworks contractor during the construction stage:
- Any on-Site excavation work will be informed by the results of the intrusive investigation work and any risks will be addressed under the Health and Safety at Work Act, 1974<sup>39</sup>. All reports from this Site will be available to the Applicant through the Health & Safety File.

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<sup>39</sup> Health and Safety at Work etc. Act 1974. Available at: <https://www.legislation.gov.uk/ukpga/1974/37>

- 5.59 The reuse of materials on-Site will be subject to a materials management plan, which will also be utilised to segregate any confirmed or suspected contaminated soil from uncontaminated soil, to avoid cross-contamination.
- 5.60 As part of the proposed groundworks, the requirement for pumping of excavations or dewatering may arise. Pumped waters will be disposed of in a controlled manner to the public sewer (with appropriate Southern Water consent), following primary treatment, such as the removal of large solids, oils and grease from wastewater, where necessary.
- 5.61 The construction stage and general earthworks associated with the preparation of the Site have the potential to alter the existing properties of the Site's soils. Surface water runoff and wind have the varied potential to erode soil from the Site, resulting in potential fugitive dust or particulate emissions to neighbouring properties and receiving watercourses.
- 5.62 Adherence to the following general guidelines will reduce the impact of the soil erosion that will inevitably occur during the construction stage of the Proposed Development:
- Control the height of soil stockpiles on-Site to minimise wind-blown erosion;
  - Avoid the unnecessary removal of vegetation;
  - Avoid creation of steep slopes to minimise runoff velocities;
  - Where possible, direct runoff away from existing surface water drains; and
  - All existing surface water drains will be provided with appropriate and suitable siltation traps. All siltation traps shall be inspected and maintained on a regular basis.
- 5.63 These tertiary mitigation measures will be implemented as part of the CEMP.
- 5.64 Therefore, cut and fill work to soil structure and suitability for reuse is not considered to be significant and will not be considered further in the EIA or reported in the ES.

## **Lighting**

### **Technical Baseline**

- 5.65 A lighting spillage and dark skies survey is due to be completed to detail the existing lighting conditions on and around the Site. Results of this survey are not yet available; therefore, information from desk-based sources have been utilised to inform the technical baseline.
- 5.66 Existing light sources on Site include the existing Jubilee Fields floodlights associated with the current 1<sup>st</sup> team pitch for Billingshurst Football Club that are typically used 3 evenings per week, up to 22:00 hrs.
- 5.67 In the vicinity of the Site, there are existing light sources including; street lighting (on the A29 and A272 to the east of the Site), small scale commercial and domestic lighting (i.e. from Billingshurst Recycling Centre, Platts Roundabout Petrol Station, and Billingshurst Trade Park and break out from windows) together with the existing

Jubilee Fields Sports Pitch Floodlighting. **Figure 5.4** shows the CPRE dark skies map <sup>40</sup> for Billingshurst (from 2015 satellite imagery) showing that, as expected, the brighter areas are around the village centres.

- 5.68 Given this baseline, it is considered that the Site and surrounding area will fall into category E3 'Medium District Brightness' in accordance with the Institution of Lighting Professionals (ILP) Guidance 2021<sup>41</sup>.
- 5.69 The nearest boundary of the South Downs National Park International Dark Night Sky Reserve is approximately 2.5km from the Site. The nearest Observatory is the Windlesham School Observatory, approximately 12km to the south-east of the Site and is understood to be located to the south of the South Downs Way and therefore does not have views to the Site.
- 5.70 This section considers the potential effects arising from light spillage and disturbance on residential receptors located within and in the vicinity of the Site. Effects on ecological receptors and landscape and visual receptors are considered separately in **Chapters 9** and **10**, respectively.

***Light Spillage from Construction Compound Lighting on Existing or Future Sensitive Human Receptors.***

- 5.71 During the construction stage, temporary lighting may be required to support on Site activities that may have adverse effects on sensitive residential receptors if not appropriately managed. However, as noted above, there is already a mix of lighting sources in vicinity of the Site, so existing residential properties are already going to be subject to a level of artificial lighting associated with street lighting, small-scale domestic and commercial lighting and breakout from windows, i.e. Category E3 in accordance with ILPGN01/21. Therefore, there is unlikely to be a significant deviation from the baseline lighting environment.
- 5.72 With that said, any construction compound lighting required will be temporary and utilised in the winter only (where light levels are not safe to undertake work safely) and will be controlled and designed to achieve minimum spillage beyond the boundary of any site compounds (which will be located variously as the scheme build progresses, but will all be within the boundary of the Site). Best practice measures will be implemented in line with ILPGN01/21, specifically, this will be the requirement for compound lighting to be designed to achieve the E3 post curfew maximum illuminance criteria of 2lux<sup>42</sup> at nearby vertical receptors.
- 5.73 These construction lighting measures will be set out and controlled through the implementation of a CEMP.
- 5.74 As such, lighting from construction works is not considered to be significant and will not be considered further in the EIA or reported in the ES.

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<sup>40</sup> Extract of CPRE Dark Skies Map <https://www.cpre.org.uk/light-pollution-dark-skies-map/>

<sup>41</sup> ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01/21).

<sup>42</sup> Table 3- ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01/21).

***Light Spillage from Street Lighting, Retail Lighting, Retail Illuminations and Sports Pitch Lighting on existing and future sensitive receptors***

- 5.75 Lighting will be introduced as part of the Proposed Development in the form of street lighting for new internal roads, operational retail lighting (e.g. security and illuminations) and the new floodlighting associated with the proposed football pitch. It is not expected that there will be significant effects of light from these sources on the existing and future (the effect of the Proposed Development on itself), residential properties as all lighting will be designed to achieve no more than 10 lux spillage (pre-curfew)<sup>43</sup> and 2 Lux spillage (post curfew), in accordance with GN01, at nearby existing or proposed facades of dwellings. Light spillage modelling from these sources will be undertaken and provided as part of the Lighting Impact Assessment to be submitted as part of the planning application, that will also detail appropriate mitigation and recommend suitable controls (if required). As such, light spillage from street lighting, retail lighting, retail illuminations and sports pitch lighting on existing and future sensitive receptors is unlikely to be significant and will not be considered further in the EIA or reported in the ES.

***Development Lighting on South Downs National Park International Dark Night Sky Reserve***

- 5.76 The nearest boundary of the South Downs National Park International Dark Night Sky Reserve is approximately 2.5km to the west of the Site. However, all proposed lighting (including flood lighting will be designed to achieve 0 (or 'near zero') upward light ratio and therefore it is unlikely that the lighting proposed as part of the Proposed Development will lead to significant effects on dark skies. However, sky quality measurements will be undertaken at key locations as shown on **Figure 5.5**, including at Bedham: Flexham Park trig Point (or Similar along footpath) which is within South Downs International Dark Skies Reserve and near Tote Monument, where the footpath forms the boundary of the South Downs International Dark Skies Reserve. Measurements will be undertaken during cloudless and new moon conditions.

The results of the sky quality measurements will be provided as part of the Lighting Impact Assessment that will form part of the planning application, that will also detail appropriate mitigation and recommend suitable controls (if required). As such, the effects of development lighting on South Downs National Park are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

**Major Accidents and Disasters**

**Technical Baseline**

- 5.77 The Site does not fall within any Inner, Middle or Outer Health and Safety Executive (HSE) Consultation Zones<sup>44</sup>.

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<sup>43</sup> Curfew is defined in ILPGN01/21 as 'The time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied the local planning department. Depending upon application curfew times often commence between 21:00 to 23:00 and may run until 07:00'.

<sup>44</sup> <https://www.hse.gov.uk/landuseplanning/planning-advice-web-app.htm>

- 5.78 A review of the HSE Control of Major Accident Hazards (COMAH) 2015 Public Information Record<sup>45</sup> confirmed that there are no COMAH sites within or adjacent to the Site. One COMAH site is located within 5km of the Site and comprises:
- Avanti Gas Limited, a lower-tier COMAH site: located approximately 4.6km south-east of the Site. Activities at this site include fuel storage/distribution.
- 5.79 The Site lies in an area classified as having a low risk of uncovering Unexploded Ordnance (UXO) according to the Zetica map<sup>46</sup> and a Detailed UXO Risk Assessment undertaken for the Site is provided at **Appendix 5.6**.
- 5.80 A 400kV OHL crosses the northern part of the Site on a south east to north west trajectory, and several 11kV powerlines also pass through the Site. A water main passes through the Site on an east to west trajectory just north of Hilland Roundabout and is operated by Southern Water. There are no gas mains within the Site.
- 5.81 A qualitative appraisal of major accidents and/or disasters considered relevant to the Proposed Development is presented in **Table 5.2**.
- 5.82 As part of the appraisal, the factors that have been considered include the understanding of the likelihood of a risk event occurring, the consequence of such an event and the mitigation identified to control / manage risks to be 'As Low As Reasonably Practicable' (ALARP). ALARP describes the level to which stakeholders (such as the HSE) expect to see risks controlled, taking account of being 'reasonably practicable' (i.e. weighing a risk against the effort, time and money needed to control it).

**Table 5.2: Appraisal of the risk of major accidents and / or disasters**

| Effect                                                | Appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Major accidents associated with nearby COMAH sites    | The Proposed Development would not be classified as a COMAH site, but is within 5km of a registered COMAH site. The nearest COMAH site is located approximately 4.6km south-east of the Site and is subject to stringent controls and management regimes in place in line with legislative requirements. Therefore, the risk of major accidents from this site is considered to be ALARP.                                                                                                                                                                       |
| Major accidents associated with underground utilities | During the construction stage, working areas will be secured with restricted access so only suitably qualified personnel are present. Works to confirm the location of utilities will be undertaken before the commencement of activities in liaison with the relevant operators. Good practice working measures will be put in place as part of the CEMP in line with the Construction (Design and Management) Regulations 2015 and other health and safety regulations, such as the preparation of specific method statements and making workers aware of the |

<sup>45</sup> <https://notifications.hse.gov.uk/COMAH2015/Search.aspx>

<sup>46</sup> <https://zeticauxo.com/guidance/risk-maps/>

| Effect                                                                                    | Appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                           | location of utilities and their easements where works are undertaken in proximity to utilities. In addition, relevant HSE guidance will be adhered to, including Avoiding danger from underground services <sup>47</sup> . With such measures in place, the risk is considered to be ALARP.                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Major accidents associated with utility diversions                                        | Any required diversions of utilities during construction will be undertaken by the relevant Distribution Network Operator (DNO) (or a third-party contractor appointed by the DNO), who will operate in line with standard good practice working measures, including accordance with the Construction (Design and Management) Regulations 2015 and other health and safety regulations. Any such works would include appropriate isolation of utilities as required. With such measures in place, the risk is considered to be ALARP.                                                                                                                                                                                          |
| Major accidents associated with overhead powerlines                                       | The Site is crossed by a 400kV OHL. During construction, safe working methods will be implemented and included in the CEMP. This will include adherence to relevant health and safety legislation, including GS6 Avoiding danger from overhead lines <sup>48</sup> and ensuring construction workers are briefed on the appropriate methods of working and the easements. During operation, the OHL will be retained on its current trajectory, and no built development will be undertaken within the appropriate offsets. With such measures in place, the risk is considered to be ALARP.                                                                                                                                   |
| Major accidents caused by ground subsidence and associated structural / building collapse | As part of the CEMP, good practice working measures and emergency measures will be put in place in accordance with the Construction (Design and Management) Regulations 2015. All earthworks and foundation design will be in accordance with relevant standards and guidance, including but not limited to CIRIA Report C572: Treated ground engineering properties and performance <sup>49</sup> , British Research Establishment document FB75: Building on Fill - Geotechnical Aspects <sup>50</sup> , British Standard 6031:2009: Code of Practice for Earthworks <sup>51</sup> and Building Regulations Approved Document A - Structure <sup>52</sup> . With such measures in place, the risk is considered to be ALARP. |
| Major accidents associated with fire                                                      | As part of the CEMP, construction works will be undertaken in line with Fire Prevention on Construction Sites: Joint Code of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

<sup>47</sup> HSE (2014) Avoiding danger from underground services HSG47.

<sup>48</sup> HSE (2013) GS6 Avoiding danger from overhead lines.

<sup>49</sup> J A Charles and K S Watts (2002). Treated ground - engineering properties and performance (C572).

<sup>50</sup> BRE (2015) FB75 Building on fill: geotechnical aspects (3rd edition).

<sup>51</sup> British Standard 6031:2009 Code of practice for earthworks.

<sup>52</sup> HM Government (2013) Approved Document A – Structure.

| Effect                                                                                   | Appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                          | <p>Practice<sup>53</sup>. All buildings will be designed with appropriate fire prevention/control measures (e.g. fire doors, extinguishers, etc.) and all external facades and materials will meet the necessary fire resistance standards set out within relevant legislation (e.g. the Building Regulations). Fire management measures, including smoke detectors etc.) will also be installed within the Proposed Development. It is assumed that the final end-users/ building management company will have in place the required emergency procedures/ practices (i.e. Fire Emergency Evacuation Plan (FEEP) or apparatus/ instruments (i.e. smoke detectors/ sprinklers) required by law for commercial occupation. With such measures in place, the risk is considered to be ALARP.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>Major flood event caused by an extreme weather event or failure of infrastructure</p> | <p>The majority of the Site is located within Flood Zone 1 of the Environment Agency's Flood Map for Planning, which is land considered at Low Probability of flooding from rivers and seas. There are small areas of land adjacent to the River Arun and along existing watercourses located within the Site which are within Flood Zones 2 and 3 and classified as being at 'high' probability of flooding.</p> <p>Areas of surface water flood risk are located across the Site but are mainly associated with existing Ordinary Watercourses. There are no areas of the Site considered to be at risk from reservoir flooding. Flood risk from groundwater is considered to be high.</p> <p>Measures such as the installation of a temporary surface water drainage system within the CEMP and the implementation of SuDS within the design of a new surface water drainage system will manage runoff during the construction and operation stages. Additionally, the Proposed Development will be developed to ensure all infrastructure classified as 'more vulnerable' will be located outside of Flood Zones 2 or 3. Further information on flood risk is detailed within Chapter 12.</p> <p>With the above measures in place, the risk is considered to be ALARP.</p> |
| <p>Major accidents on the local road network</p>                                         | <p>The management of construction vehicles in and out of the Site and the enforcement of stringent safety standards reduces the risk of major accidents to a low level, both in terms of frequency and likelihood. With respect to non-motorised users of the local road network, where new pedestrian/ cycle infrastructure is anticipated as part of the Proposed Development, these too will accord with relevant standards. As such, pedestrian safety is considered to be well defined and</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

<sup>53</sup> RISC Authority and The Fire Protection Association (2022) Fire Prevention on Construction Sites: The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation (10th Edition).

| Effect                                                                                | Appraisal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                       | controlled in line with standard highways requirements. The potential for major transport accidents during the construction stage will be mitigated by a construction logistics/traffic management plan as part of the CEMP. This will include measures such as a planned route(s) for construction traffic to reduce the risk to road users, restricting deliveries to certain periods and ensuring the vehicles are well maintained. The new accesses and vehicle circulation through the Proposed Development will all be designed in accordance with relevant guidance/standards. With these measures in place, the risk is considered to be ALARP. |
| Major accidents associated with risk of UXO on-site                                   | As detailed in ' <i>Ground Conditions and Contamination</i> ' earlier in this Chapter, the Site is considered to have a low potential for previously undiscovered UXO to be present. Nevertheless, appropriate mitigation measures will be implemented as part of a CEMP, such as communication to all construction workers on UXO risks, safety training by a competent expert and the attendance and a Site-Specific Emergency Response Plan. With such measures in place, the risk is considered to be ALARP.                                                                                                                                        |
| Major accidents as a result of malicious attacks (e.g. vandalism, arson or terrorism) | Due to its nature, the Proposed Development is unlikely to attract terrorist activities. Whilst targeted acts of vandalism or arson cannot be fully mitigated, the adoption of appropriate security measures at the construction stage and operational stages (such as security lighting and CCTV) will help to minimise the likelihood of such events occurring. It is also assumed that appropriate emergency planning has been undertaken by HDC and local emergency services. Given this, the risk is considered to be ALARP.                                                                                                                       |
| Major accidents during construction works                                             | All works will be undertaken in accordance with relevant legislation, standards and guidance, including the Construction (Design and Management) Regulations 2015 and HSE's health and safety in construction <sup>54</sup> . Appropriate method statements and risk assessments will be undertaken prior to the commencement of specific activities. With these measures in place, the risk is considered to be ALARP.                                                                                                                                                                                                                                 |
| Major accidents associated with employment during operation                           | The Proposed Development will involve employment uses through the operation of the 2FE Primary School, care provision, local community centre and retail space. The development of these uses will be subject to necessary building regulations and standards in order to be classified as safe for use, inclusive of fire safety standards. Therefore, the risk is considered to be ALARP.                                                                                                                                                                                                                                                             |

<sup>54</sup> HSE (2006) Health and safety in construction (HSG150).

- 5.83 Based on the evidence provided within **Table 5.2**, although there is the potential for a wide range of major accidents and disasters that could occur, the risk is considered to be ALARP due to the management regimes required under established legislative requirements or mitigation committed to during the design process.
- 5.84 As noted above, there is one COMAH site located within 5km of the Site. Given the requirement for management and mitigation of COMAH sites, the risk is considered to be ALARP.
- 5.85 The EIA Regulations do not specify the need for the consideration of natural disasters. However, for completeness, this has been considered.
- 5.86 The probability, frequency and likelihood of natural disasters arising from climatic occurrences (i.e. hurricanes) are considered to be very low due to the natural climatic condition of the UK within the global climate system. Specific geological events (i.e. earthquakes, tsunamis, volcanic incidents, etc.) are also considered to be very low due to the general absence of required geological conditions (i.e. area of tectonic plate interaction) within or in proximity to the UK. Although earthquakes have occurred within the UK, the magnitude of such events has generally been low.
- 5.87 Therefore, effects related to the risk of major accidents and/or disasters are unlikely to be significant and will not be considered further in the EIA or reported in the ES.

## Minerals

### Technical Baseline

- 5.88 The Site is located within the Brick Clay Resource Consultation Area as highlighted within the West Sussex Minerals and Waste Safeguarding Guidance (2020)<sup>55</sup>. Policy M9: Safeguarding Minerals of the West Sussex Joint Minerals Local Plan (2021)<sup>56</sup> states that: *“...brick-making clay...reserves are safeguarded against sterilisation. Proposals for non-mineral development within the Minerals Safeguarded Areas will not be permitted unless: (i) Mineral sterilisation will not occur; or (ii) it is appropriate and practicable to extract the mineral prior to the development taking place, having regards to the other policies in this Plan; or (iii) the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible.”*
- 5.89 British Geological Survey (BGS) mapping indicates that the majority of the Site overlies the bedrock geology of the Weald Clay Formation (mudstone and sandstone). The western most areas of the Site are shown to overlie superficial Alluvial Deposits (clay silt, sand and gravel) and Arun Terrace Deposits (sand and gravel) over the Weald Clay Formation (mudstone and sandstone).
- 5.90 Targeted ground investigation works, undertaken by Ground Condition Consultants (**Appendix 5.3**), to install 10no. groundwater monitoring wells across the Site has

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<sup>55</sup> West Sussex County Council (2020) Minerals and Waste Safeguarding Guidance. Available at: [https://www.westsussex.gov.uk/media/13437/mw\\_safeguarding\\_guidance.pdf](https://www.westsussex.gov.uk/media/13437/mw_safeguarding_guidance.pdf) [Accessed: 27/11/2025]

<sup>56</sup> West Sussex County Council (2021) Joint Minerals Local Plan. Available at: [https://www.westsussex.gov.uk/media/11736/mlp\\_adoption.pdf](https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf) [Accessed 27/11/2025]

confirmed the underlying geology as comprising Topsoil over Weald Clay Formation, mainly clay soils with some localised sand bands.

- 5.91 The West Sussex Monitoring Report 2023/24<sup>57</sup> identifies that there is a total permitted reserve of brick clay of 12.49 million tonnes (mt). This is split across five consented extraction sites (three active and two inactive).
- 5.92 Paragraph 227 of the National Planning Policy Framework<sup>58</sup> states that mineral planning authorities should plan for a steady and adequate supply of industrial minerals and maintain a stock of permitted reserves – for brick clay reserves should be at least 25 years. The Monitoring Report identifies that the total sales of brick clay in 2023/24 was 0.28mt.
- 5.93 The Monitoring Report also identifies that the 10-year average brick clay reserves are 15.9mt and the 10-year average sales are 0.31mt.
- 5.94 Of the 3no. active brickworks the Monitoring Report identifies that 2no. have at least 25-years of reserves.

#### ***Sterilisation of mineral resources***

- 5.95 The Proposed Development has the potential to sterilise brick clay reserves. As such it is necessary to assess the Proposed Development within the scope of Policy M9: Safeguarding Minerals in the Joint Minerals Local Plan.
- 5.96 Based on the 2023/24 total permitted reserves figure of 12.49mt of brick clay and the annual sales figure of 0.28mt the supply of brick clay to serve brickworks stands at 44.6 years (notably in excess of the 25-year reserve requirement of the NPPF). If the 10-year average brick clay reserves figure of 15.9mt and the 10-year average sales figure of 0.31mt are used the supply would stand at over 51 years (more than double the NPPF requirement). On this basis alone it can be concluded that the sterilisation of brick clay at the Site would not have a significant effect on the reserves or operation of brickworks in the County.
- 5.97 Therefore, sterilisation of mineral resources is not considered to be significant and will not be considered further in the EIA or reported in the ES. A Mineral Resource Assessment will, however, be submitted separately as part of the Application.

## **Waste**

### **Technical Baseline**

- 5.98 The Site is located within Horsham District Council (HDC), who act as the waste collection authority, and WSCC, who act as the waste disposal authority.
- 5.99 As the waste collection authority, HDC currently operate a weekly bin collection, alternating between mixed dry recycling and residual waste bins. Garden waste is also

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<sup>57</sup> West Sussex County Council (2025) West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2023/24. Available at:

[https://www.westsussex.gov.uk/media/vkqna0d1/monitoring\\_report\\_2023to2024.pdf](https://www.westsussex.gov.uk/media/vkqna0d1/monitoring_report_2023to2024.pdf) [Accessed 27/11/2025]

<sup>58</sup> Ministry of Housing, Communities and Local Government (2014) National Planning Policy Framework. Available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed 27/11/2025]

collected in wheeled bins. In 2026, food waste collections will also be rolled out across the District. HDC recycle over 50% of the waste that is collected.

- 5.100 As the waste disposal authority WSCC have a duty to arrange for the disposal of residual waste and recycling collected by the district and borough councils. This is managed through three contracts, Biffa West Sussex Ltd provide the Recycling and Waste Handling contract, and the Material Resource Management contract. West Sussex Britaniacrest Seneca Partnership deliver the Refuse Derived Fuel contract. As the waste planning authority WSCC are also responsible for monitoring the performance of other waste management facilities in the County that manage all other waste streams, and assessing the capacity and need for additional facilities.
- 5.101 At a baseline level the West Sussex Monitoring Report 2023/24<sup>59</sup> identifies that across the County in 2023/24 there were 1,573,000 tonnes of construction demolition and excavation (CD&E) waste arisings, 415,000 tonnes of municipal and solid waste (MSW) arisings, and 558,000 of commercial and industrial (C&I) arisings. Of the CD&E waste 700,000 tonnes was landfilled, 351,000 tonnes recycled and 522,000 tonnes recovered. Of the MSW arisings 21,000 tonnes was landfilled, 242,000 tonnes recycled/composted and 152,000 tonnes recovered. Of the C&I waste 35,000 tonnes was landfilled, 233,000 tonnes was recycled/composted and 290,000 tonnes recovered.
- 5.102 The Monitoring Report identifies that for non-inert recycling and composting (MSW and C&I) there is a surplus of operational capacity within the County to manage arisings (a surplus capacity figure of 107,535 tonnes). The same is also true for CD&E recycling, with no shortfall in capacity reported. There is an identified shortfall in management capacity for non-inert waste recovery (MSW & C&I) of 116,000 tonnes – relating to management options such as mechanical biological treatment (MBT) and energy from waste (EfW). There is no non-inert landfill capacity within the County since Brookhurst Wood landfill stopped accepting waste in 2018. The Monitoring Report identifies a 0.61 million tonnes shortfall in non-inert landfill capacity. An allocation is provided in the Waste Plan for an extension to Brookhurst Wood which would provide 0.86 million tonnes of additional capacity. The recovery of inert waste (principally putting excavated waste soils to a beneficial use) has a reported available capacity within the County of 718,825 tonnes.
- 5.103 Whilst there are no reported or available figures, the Site would currently generate a limited amount of waste at both a District and County level with waste generation limited to existing commercial premises, and a sports facility, as well as any waste associated with the management of agricultural land.

***Increase in Waste Management Demand during Construction***

- 5.104 The Proposed Development would generate CD&E waste during the construction stage including, for example: bricks, glass, gypsum, aggregate, concrete, wood and plastic. In addition, it can be anticipated that larger volumes of excavated soils (from foundation, footings, drainage infrastructure etc) would also require management. As such it is necessary to assess the generation of this waste stream to i) ensure it is minimised and ii) that it can be managed within the available waste management capacity within the

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<sup>59</sup> West Sussex County Council (2025) West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2023/24. Available at: [https://www.westsussex.gov.uk/media/vkqna0d1/monitoring\\_report\\_2023to2024.pdf](https://www.westsussex.gov.uk/media/vkqna0d1/monitoring_report_2023to2024.pdf) [Accessed 27/11/2025]

County. Waste will be managed through the production of an outline Site Waste Management Plan (SWMP) completed as part of a CEMP.

- 5.105 A SWMP is used to plan, implement, monitor and review waste minimisation and management on construction sites. The SWMP is also used to record how waste is reduced, reused, recycled and disposed of on a construction site. The SWMP would identify the anticipated CD&E waste arisings associated with the construction stage and present a management strategy in line with the waste hierarchy. Although the Site Waste Management Plan Regulations (2008) were revoked in 2013 the use of SWMPs can still inform best practice.
- 5.106 With reference to the latest Monitoring Report there are no identified shortfalls in waste management capacity in West Sussex for CD&E waste and in-combination with the best practice measures of a SWMP it would ensure the CD&E waste generation is minimised, consistent with Local Plan<sup>60</sup> requirements, and would not significantly impact upon available management capacity.
- 5.107 Therefore, the increase in waste management demand during construction is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Increase in Waste Management Demand during Operation***

- 5.108 The Proposed Development would generate MSW during the operational stage from the new residential units. There would also be a limited amount of commercial waste arisings from the proposed school and community facilities (although this would be expected to be broadly similar in its nature to the residential units) and the proposed retail provision. As such, it is necessary to assess the generation of these waste streams to i) ensure that appropriate provision for storage and collection is designed in and ii) that the arisings can be managed within the available waste management capacity within the County or the wider area, where Regional level provision exists.
- 5.109 This would be delivered through the production of an Operational Waste Management Plan (OWMP). The OWMP would set out outline measures for waste storage, collection, recycling and reuse and disposal in compliance with the required standards, set out in the HDC Household Waste Collection Policy<sup>62</sup> and the relevant Local Plan policies of HDC and WSCC as the local collection and disposal authorities.
- 5.110 With reference to the BS 5906:2005<sup>63</sup> guidance it is possible to provide an estimation of potential waste arisings volumes from the proposed residential, care provision, and commercial uses. For the purposes of EIA Scoping waste arisings have been calculated

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<sup>60</sup> West Sussex County Council (2014) West Sussex Waste Local Plan. Available at: <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/waste-local-plan/> [Accessed: 09/12/2025]

<sup>61</sup> Horsham District Council (2015) Horsham District Planning Framework (excluding South Downs National Park). Available at: [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf) [Accessed: 09/12/2025].

<sup>62</sup> Horsham District Council (2025) Household Waste Collection Policy. Available at: <https://www.horsham.gov.uk/waste-recycling-and-bins/household-waste-collection-policy#1> [Accessed 11/12/2025]

<sup>63</sup> British Standards (2005) BS 5906:2005 Waste Management in Buildings – Code of Practice

on an assumption of 1,100 dwellings (with a 3-bedroom average), an 80-bed care provision, and 2,400m<sup>2</sup> of commercial (supermarket) floorspace<sup>64</sup>.

- 5.111 It is estimated that the residential dwellings would generate a total of ~2,400 tonnes of MSW per annum. This assumes a total of 231,030 litres of MSW per week (based on the referenced British Standard calculation) and a conservative conversion factor of 0.20 tonnes per cubic metre. This volume would represent a 0.58% increase in MSW in West Sussex based on the 2023/24 volumes provided in the Monitoring Report.
- 5.112 It is estimated that the care provision would generate a total of 58.5 tonnes per year based on the same assumptions above. This volume would represent a 0.01% increase in MSW in West Sussex.
- 5.113 It is estimated that the commercial (supermarket) use would generate a total of 3,744 tonnes of commercial waste per year. This assumes a total of 360,000 litres of commercial waste per year (based on the referenced British Standard calculation) and a conservative conversion factor of 0.20 tonnes per cubic metre. This volume would represent a 0.67% increase in commercial waste arisings in West Sussex based on the 2023/24 volumes provided in the Monitoring Report.
- 5.114 For the proposed school, based on guidance<sup>65</sup> which estimates up to 45kg of waste per pupil per school year, an assumed 420 pupil primary school would generate 18,900kg of waste per school year, equivalent to 18.9 tonnes. This volume would represent a 0.003% increase in commercial waste arisings in West Sussex.
- 5.115 The estimated waste volumes, calculated above, generated in the operational stage for all parts of the Proposed Development would not be significant at either a District or County level.
- 5.116 The OWMP measures would include extending the HDC recycling and waste collection systems to the Proposed Development. The West Sussex Waste Plan covers the period to 2031 and includes a growth factor for the management of increased arisings as well as a strategic objective to achieve 'zero waste to landfill' by 2031. The latest Monitoring Report confirms there is no shortfall in capacity for MSW & C&I waste recycling. Although there is currently an identified shortfall in recovery capacity for these waste streams (and there is no non-inert landfill capacity within the County – consistent with the objective to move 100% away from landfill), these are lower in the waste hierarchy and the Waste Plan makes provision for the delivery of new strategic waste management capacity. Management of waste from the Proposed Development in accordance with the local policy objective of 'zero waste to landfill' would also be consistent with the IEMA guidance<sup>66</sup> on the impact of a development resulting in no change or a negligible change to waste management capacity when diversion levels are at least 90% or more.

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<sup>64</sup> Note that the design remains subject to refinement. However, the figures provided offer a representative estimate of waste generation for the purposes of EIA Scoping.

<sup>65</sup> Business Waste (2025) School Waste Facts. Available at: <https://www.businesswaste.co.uk/waste-facts/school-waste-facts> [Accessed: 17/12/2025]

<sup>66</sup> IEMA (2020) IEMA guide to: Materials and Waste in Environmental Impact Assessment

- 5.117 With the combination of best practice measures, secured within the OWMP, to ensure that adequate provision is made for waste management within the development to maximise recycling and reduce reliance on management lower down the waste hierarchy (such as recovery and disposal) alongside the available MSW & commercial waste recycling capacity within the County (moving towards 'zero waste to landfill'), the generation of these waste streams would not have a significant effect.
- 5.118 Therefore, an increase in waste management demand during operation is not considered to be significant and will not be considered further in the EIA or reported in the ES.

## 6. Transport and Access

### Technical Baseline

- 6.1 The Site is bound by key links of the local road network; the A29 (Stane Street) bounds the Site to the east, whilst the A272 (Newbridge Road) dissects the southern part of the Site. These roads provide routing to the north and west of Billingshurst and access to Billingshurst via the Hilland Roundabout and the Platts Roundabout.
- 6.2 The Hilland Roundabout provides routeing towards the east (A272) of Billingshurst, and the Platts roundabout provides routing south and west of Billingshurst (A29).
- 6.3 There is an extensive network of Public Rights of Way that route within and beyond Billingshurst, complemented by a network of footways.
- 6.4 Footpath 1327 routes through the Site connecting with footpaths 1326 and 1335, and is carried over the A29 by a footbridge connecting into the existing pedestrian network at Pine Close and Maple Close. Bridleway 3668 is similarly carried across the A29 by a footbridge, which connects between Newbridge Road and Newbridge Road East. Additional crossing facilities are provided at the Hilland and Platts roundabouts via dropped kerbs with tactile paving, which utilises the roundabouts' splitter islands.
- 6.5 The New Road bus stops on the A29 provide access to Service 100 which routes between Burgess Hill and Horsham, providing an hourly service Monday to Saturday. The Bridgewaters Farm and Hole Farm bus stops on the A272 provide access to Services 64 and 69; Service 64 provides a twice weekly service between Loxwood and Horsham and Service 69 provides a twice weekly service between Alford and Worthing.
- 6.6 Billingshurst Railway Station is located within a 2km walking distance of the Site and provides two trains per hour to Horsham, Crawley, Clapham Junction, London Victoria, Arundel and Bognor Regis.
- 6.7 2024 Annual Average Daily Traffic (AADT) traffic flows from Automatic Traffic Counters (ATC) are 20,387 vehicles (358 HGVs) and 23,735 vehicles (369 HGVs) north and south of the A29 / New Road / Billingshurst Business Park roundabout, respectively.

### Proposed Scope of Assessment

- 6.8 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### Effects Unlikely/Not Significant

- 6.9 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this

judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

### ***Construction Traffic***

- 6.10 The construction stage of development is anticipated to commence in 2027 and built out over approximately a 10-year period with final completion and occupation in 2037.
- 6.11 The potential impacts during the construction stage are identified as:
- Potential impact on non-motorised user (NMU) amenity, fear and intimidation due to the increase in vehicle flows and the change in flow composition i.e. an increase in large type vehicles anticipated by the Proposed Development.
  - Potential increase in NMU and driver delay due to the additional vehicles associated with the Proposed Development on the highway network together with possible temporary traffic management.
  - Potential reduction in public safety, particularly vulnerable road users, due to the introduction of large-type vehicles travelling to and from the Site.
- 6.12 The related construction traffic will comprise two principal forms. Firstly, workforce-related traffic will comprise the arrival/departure of the workforce associated with the construction of the Proposed Development. Secondly, delivery-related traffic will comprise traffic associated with deliveries, plant movements, and material movements for export/import of materials.
- 6.13 Typically for a buildout of 100 dwellings per annum, there would be an average daily workforce of 50 staff. The highest annum of housing construction is expected to deliver 110 units. Therefore, the highest number of average daily construction workers would be 55. This number of construction workers is not expected to generate the same number of vehicle trips as many workers travel together in vans or cars.
- 6.14 Typically, construction hours demand the workforce to arrive/depart outside of peak hours, and as such this element of construction traffic will have a minimal effect during peak hours. In addition, the total movements associated with the completed Proposed Development will be much higher than the number of workforce-related movements, and therefore these movements will present less onerous traffic conditions than those associated with the occupation of the Proposed Development.
- 6.15 The ATCs recorded AADT flows on the A29 where the greatest impact of construction worker vehicle movements is likely to occur, of 20,387/23,735. The ISEP (formerly IEMA) guidelines<sup>67</sup> establishes that significant environmental effects are associated with substantial changes in traffic flow with a key threshold of +30% or +10% on highly sensitive links. The change in traffic flows is expected to be 0.5%. On this basis the construction worker traffic associated with the construction stage of the Proposed Development will not have a significant impact. Similar to above an estimate for Heavy Goods Vehicles (HGV) movements for 100 houses per annum is seven HGV deliveries equating to 14 daily HGV movements. For the delivery of 110 houses per annum the

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<sup>67</sup> ISEP Guidelines (July 2023): Environmental Assessment of Traffic and Movement.

generation would be 16 HGV daily movements. Delivery to the Site will be minimal in terms of numbers of vehicles and will most likely be spread throughout the course of the day.

- 6.16 The ATCs recorded AADT HGV flows on the A29 where the greatest impact of HGVs is likely to occur of 358/369. The ISEP (formerly IEMA) guidelines establishes that significant environmental effects are associated with substantial changes in traffic flow with a key threshold of a doubling of HGV flows. The change in HGV flows is expected to be 4.5%. On this basis the construction traffic associated with the construction stage of the Proposed Development will not have a significant impact.
- 6.17 During construction, activities will be controlled through the implementation of a CEMP which will include an HGV movement plan to control the routing of HGVs through routing vehicles to the periphery roads (A29/A272 etc.) and prohibit routing through Billingshurst. This is documented in the PEMP and will be controlled by the CEMP which will be conditioned. The CEMP will also control, if required, the temporary diversion/closure of PRow.
- 6.18 Thus, in consideration of the above, it is considered that the change due to construction related movements will be negligible for all assessed criteria discussed above. The receptors in close proximity to the Site are of low to medium sensitivity, comprising mostly of farmland and residential units (i.e. both existing and proposed), and, whilst higher sensitivity receptors would be present elsewhere in the network, construction traffic, which would already be at low levels, would be further dispersed at these points. Thus, whilst there would be a direct effect in this instance, this would be temporary (i.e. over the medium term) and not be significant Therefore will not be considered further or reported in the ES.
- 6.19 During the construction there may be a need for temporary diversion / closure of PRow to maintain safety for members of the public. Any diversion / closure would be kept to the minimum time and details will be set out in the CEMP.

***Hazardous or Large Loads [all road users]***

- 6.20 No hazardous or large loads will be associated with the Proposed Development.
- 6.21 Therefore, hazardous / large loads will not be considered further in the EIA or reported in the ES.

**Effects Likely/Significant**

- 6.22 Table 6.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 6.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect       | Receptor(s)              | Applicable Stage(s) |
|--------------|--------------------------|---------------------|
| Severance    | Pedestrians and cyclists | Operation           |
| Driver Delay | Vehicle drivers          | Operation           |

| Effect                        | Receptor(s)              | Applicable Stage(s) |
|-------------------------------|--------------------------|---------------------|
| Pedestrian Delay              | Pedestrians and cyclists | Operation           |
| Non-Motorised User<br>Amenity | Pedestrians and cyclists | Operation           |
| Fear and Intimidation         | Pedestrians and cyclists | Operation           |
| Road Safety                   | All road users           | Operation           |

### Assessment Methodology of Effects Likely/Significant

6.23 The following background surveys/studies have been/will be completed.

**Table 6.2: Background Surveys/Studies**

| Survey/Study/Analysis/<br>Evaluation                                                    | Overview                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Date of<br>Completion   |
|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| <b>Completed</b>                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                         |
| Traffic surveys relating to the A29 / New Road / Billingshurst Business Park Roundabout | (i) Manual Classified Count - A29 / New Road / Business Park roundabout                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 06/04/2024              |
|                                                                                         | (ii) Automatic Traffic Counter on A29 north of the A29 / New Road / Business Park roundabout                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 06/03/2024 – 12/03/2024 |
|                                                                                         | (iii) Automatic Traffic Counter on A29 north of the A29 / New Road / Business Park roundabout                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 06/03/2024 – 12/03/2024 |
| <b>Pending</b>                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                         |
| Traffic Surveys                                                                         | <p>Due to the age of the completed traffic surveys (i) and (iii) will be repeated</p> <p>Automatic Traffic Counter at the following locations:</p> <ul style="list-style-type: none"> <li>• Newbridge Road at proposed Site access;</li> <li>• At the narrow road bridge on Newbridge Road to the west of Rowner Road;</li> <li>• A272 between Platts Roundabout and Hilland Roundabout;</li> <li>• High Street;</li> <li>• West Street;</li> </ul> <p>Manual Classified Counts at the following junctions:</p> <ul style="list-style-type: none"> <li>• Newbridge Road / Rowner Road;</li> </ul> | February 2026           |

| Survey/Study/Analysis/ Evaluation | Overview                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Date of Completion |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
|                                   | <ul style="list-style-type: none"> <li>• Newbridge Road / Lordings Road;</li> <li>• Newbridge Road / Newbridge Road;</li> <li>• A272 / Recycling Site access road;</li> <li>• A272 / Platts Corner Services;</li> <li>• Platts Roundabout;</li> <li>• Hilland Roundabout;</li> <li>• Hammonds Roundabout;</li> <li>• Frenchies Roundabout;</li> <li>• High Street / East Street mini roundabout; and</li> <li>• High Street / West Street mini roundabout.</li> </ul> |                    |
| Highway Safety                    | Review of latest 5 year personal injury collision data for all junctions above plus the A29 / New Road / Billingshurst Business Park roundabout                                                                                                                                                                                                                                                                                                                       | February 2026      |

#### Guidance and Best Practice

- 6.24 The assessment will include a detailed assessment of the effects of the Proposed Development on the local road network, and the ES Chapter will be prepared in accordance with the ISEP Guidelines. The purpose of the guidance is to provide practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of a statutory EIA or non-statutory environmental assessment.
- 6.25 The guidance addresses the following specific traffic and movement related impacts that will be assessed as part of the Chapter:
- Severance of communities;
  - Road vehicle driver and passenger delay;
  - Non-motorised user delay;
  - Non-motorised user amenity;
  - Fear and intimidation on and by road users; and
  - Road user and pedestrian safety.

#### Baseline Data Collection

- 6.26 In order to complete the assessment, baseline data is to be established through various sources to understand the existing transport conditions surrounding the Site. This will

include site visits and a desktop study of local transport characteristics and potential future changes to those characteristics, including:

- A review of publicly available traffic datasets, such as the Department for Transport (DfT) Road Traffic Statistics;
- Traffic data obtained from commissioned traffic surveys (as detailed in Table 2.2) - 2026 Baseline traffic flows will be established through data obtained from commissioned traffic surveys (2026). The surveys were / will be undertaken outside of abnormal periods (i.e. school holidays, roadworks, etc).
- Personal Injury Collision (PIC) data obtained from the highway authority.

#### Determining the Study Area and Sensitive Receptors

6.27 To determine the road links and therefore receptors to be considered as part of the assessment, the ISEP Guidelines advises that two broad rules of thumb are used as criteria to assist in defining the scale and extent of the environmental assessment:

- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more.

6.28 Comparing the volume of additional traffic against the baseline levels, links with additional traffic above the screening threshold will be subject to assessment.

#### Determination of Traffic Levels

6.29 To predict the likely level of trips that will occur as a result of the Proposed Development, traffic during the operational stage will be forecast using trip rates agreed with WSCC which have been derived from the Trip Rate Information Computer System (TRICS) database with reductions made for internalised trips.

6.30 The methodology for distributing / assigning development traffic onto the study area network is agreed with WSCC and is derived from the 2011 Census<sup>68</sup>. The agreed residual trip generation of the Proposed Development is set out in Table 6.3.

**Table 6.3: Agreed Proposed Development Residual Trip Generation**

| Land Use              | AM Peak Hour |     |       | PM Peak Hour |     |       |
|-----------------------|--------------|-----|-------|--------------|-----|-------|
|                       | In           | Out | Total | In           | Out | Total |
| <b>Residential</b>    | 68           | 221 | 290   | 202          | 90  | 292   |
| <b>Primary School</b> | 14           | 11  | 24    | 1            | 1   | 2     |

<sup>68</sup> 'WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)' utilising the dataset for 'E02006597: Horsham 010'.

| Land Use          | AM Peak Hour |            |            | PM Peak Hour |            |            |
|-------------------|--------------|------------|------------|--------------|------------|------------|
|                   | In           | Out        | Total      | In           | Out        | Total      |
| <b>Employment</b> | 25           | 4          | 29         | 0            | 25         | 25         |
| <b>Total</b>      | <b>107</b>   | <b>236</b> | <b>343</b> | <b>203</b>   | <b>116</b> | <b>320</b> |

- 6.31 The agreed trip distribution of external car-borne trips is shown in **Figure 6.1**.
- 6.32 The assessment within the ES will consider the following assessment scenarios:
- Baseline (2026)
  - Baseline (2026) + Proposed Development Operational traffic forecasts.
  - Baseline (2026) + Proposed Development Operational traffic forecast + Cumulative Projects.
- 6.33 To date, consultation with WSCC has been on the basis that the assessment of traffic impact is undertaken using data to build an Excel spreadsheet model. Alternatively, if WSCC request the applicant to use a local strategic model, then a model scope will be agreed to ensure that suitable scenarios are tested.
- 6.34 The application for the Proposed Development will also be accompanied by a Transport Assessment (TA) and Framework Travel Plan (FTP). These will provide an overall transport strategy to maximise accessibility for non-car modes of transport and will assess the traffic impact of the proposals based on an assessment of conditions on the highway network.
- 6.35 Both the TA and FTP will be prepared in accordance with Planning Practice Guidance (PPG), which stipulates that the scope and level of detail in a TA will vary from site to site. The PPG identifies a range of elements that should be considered when settling the scope of the proposed assessment, including baseline transport and accessibility conditions for all modes, and expected development impacts.
- 6.36 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

### **Limitations and Assumptions**

- 6.37 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- Traffic generation estimates for the construction of the Proposed Development are based on a number of assumptions on matters such as material quantities, number of workers, indicative construction programme etc.
- A limitation in the assessment is the precision of the traffic forecast as all traffic data for the baseline condition is collected from traffic surveys which are subject to change in daily traffic flows of  $\pm 10\%$ .
- The principal assumptions which form the basis of the assessment are those used to derive the predicted trip generation of the Proposed Development (i.e. numbers of trips by land use type and the modes of travel).

## 7. Air Quality and Odour

### Technical Baseline

- 7.1 Air Quality in Billingshurst is monitored and managed by HDC under their duties in Part IV of the Environment Act 1995<sup>69</sup>. The baseline environment is largely described in their 2025 Air Quality Annual Status Report (ASR), however the limited Local Authority monitoring in Billingshurst will be supplemented by a 6-month diffusion tube monitoring survey for this Site which will feed into the assessment, but in the meantime the baseline has been informed by the 2025 ASR. Similarly, there is limited odour information regarding the Site, but this will be supplemented by odour sniffing surveys near potential sources of odour.

### Nitrogen Dioxide (NO<sub>2</sub>)

- 7.2 Nitrogen dioxide levels in Billingshurst are low with 2024 annual average levels shown in the 2025 ASR to be between 10 and 15  $\mu\text{g m}^{-3}$  at roadside locations<sup>70</sup> within Billingshurst village centre including at High Street/St Mary's Close 500m to the east of the Site. This compares with the limit value of 40  $\mu\text{g m}^{-3}$ . There is currently no monitoring along the A29 route around Billingshurst, however nitrogen dioxide levels are expected to be significantly within the limit value of 40  $\mu\text{g m}^{-3}$  as no air quality management area has been declared for Billingshurst. Monitoring along the A29 route, further south, at Pulborough shows nitrogen dioxide levels at the highest at 35  $\mu\text{g m}^{-3}$ , however this is expected to be elevated as a result of the temporary landslide contraflow traffic and not representative of nitrogen dioxide levels along the A29 route. Air quality management areas (AQMA) have been declared in nearby Storrington and Cowfold, however the Cowfold AQMA is currently in the process of being revoked. The National Atmospheric Emissions Inventory<sup>71</sup> shows that there are no significant industrial or commercial sources of nitrogen dioxide within 5km of the Site.

### Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub>)

- 7.3 The 2025 ASR shows that coarse particulate (PM<sub>10</sub>) levels in Horsham are comfortably below the limit value of 40  $\mu\text{g m}^{-3}$ . PM<sub>10</sub> levels are expected to be even lower in the Billingshurst area. The National Atmospheric Emissions Inventory shows that there are no significant industrial or commercial sources of PM<sub>10</sub> within 5km of the Site.
- 7.4 The 2025 ASR shows that fine particulates (PM<sub>2.5</sub>) levels in Horsham are also below the limit value of 20  $\mu\text{g m}^{-3}$ . PM<sub>2.5</sub> levels are expected to be even lower in the Billingshurst area. As with many parts of England, the PM<sub>2.5</sub> levels in Horsham are marginally above the 2040 Target value of 10  $\mu\text{g m}^{-3}$ . The National Atmospheric Emissions Inventory shows that there are no significant industrial or commercial sources of PM<sub>2.5</sub> within 5km of the Site, though it is acknowledged in the ASR that significant contributions to PM<sub>2.5</sub> levels in the area are from domestic wood burning.

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<sup>69</sup> Environment Act 1995 Local Air Quality Management, as amended by the Environment Act 2021

<sup>70</sup> As defined by Defra Department for Environment, Food & Rural Affairs (Defra) UK Local Air Quality Management (LAQM) guidance - one to five metres of the kerb of a busy road.

<sup>71</sup> <https://naei.energysecurity.gov.uk/>

### **Other Pollutants**

- 7.5 The National Atmospheric Emissions Inventory shows that there are no significant industrial or commercial sources of other pollutants within 5km of the Site.

### **Odour**

- 7.6 There are no likely permanent sources of odour close to the Site with the exception of Billingshurst Recycling Centre (Household Waste) which bounds the middle part of the Site and Southern Water's Billingshurst Wastewater Treatment Works, approximately 500m south of the southern part of the Site.

### **Proposed Scope of Assessment**

- 7.7 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### **Effects Unlikely/Not Significant**

- 7.8 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

### ***Existing Air Quality and Odour on Proposed Sensitive Uses***

- 7.9 The pollutant baseline (as described above) shows that there is a low likelihood of existing sources of air pollutants affecting the proposed sensitive uses (residential dwellings, school and users of the Country Park and footpaths). As baseline levels (for both nitrogen dioxide and particulates) are low it is considered that effects of existing levels of pollutants would not be significant. This will be confirmed by the data from the ongoing 6-month, 12 location, nitrogen dioxide diffusion tube survey (see **Figure 7.1**).
- 7.10 As identified above, potential sources of odour on Site have been identified as the Billingshurst Recycling Centre (adjacent to the Site) and Southern Water's Billingshurst WwTW (500m south of the Site). As such, odour sniffing surveys will be undertaken by a technician with quantified olfactory acuity on 3 separate occasions across each of the odour risk areas (as shown on **Figure 7.1**) during light winds in the direction of the proposed receptors (i.e. during easterly or north-easterly winds from the Recycling Centre and southerly winds from the WwTW). Odour contour plots and an Indicative Odour Assessment will be provided separately as part of the Application, based on these observations. A threshold level of 3.0 ouE/m<sup>3</sup> as a 98<sup>th</sup> percentile, will be used to determine whether there are any significant odour effects on the Site. Should this level be exceeded, then primary mitigation, in the form of an appropriate set-back, inclusion of non or less-sensitive use or the provision of vegetative environmental buffers (e.g. dense evergreen boundary planting) will be included in the design for the Proposed

Development to reduce the effect on receptors. However, odour effects of this magnitude from these sources are considered unlikely.

- 7.11 As such, existing air quality and odour on proposed sensitive uses is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes in Air Quality as a result of Development Related Operational or Construction Traffic on Existing Ecological Receptors***

- 7.12 In accordance with the Air Pollution Information System (APIS) website<sup>72</sup>, the general critical level of Nitrogen Dioxide for protection of ecosystems is 30 µgm<sup>-3</sup>. Based on the existing baseline, it is not expected that levels of nitrogen dioxide either as existing baseline or as a combined result of baseline and development related operational or construction traffic will exceed this level either on the Site or at surrounding ecologically sensitive receptors within 3km of the Site. According to the APIS website, there is no critical load assigned to the Upper Arun SSSI for nitrogen deposition, however baseline deposition levels are around 12 kgN/ha/yr which compares to general critical loads for rivers of 15 – 20 kgN/ha/yr. As there are generally low nitrogen deposition rates in the area it is considered unlikely that the effects of nitrogen deposition from development related operational or construction traffic will have a significant effect on nearby ecological receptors.

- 7.13 As such, air quality effects of development related operational or construction traffic on ecologically sensitive receptors are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes in Air Quality as a result of Development Related Operational and Construction Transport on Proposed Sensitive Uses***

- 7.14 The effects of development traffic on itself (the sensitive uses of the Proposed Development such as dwellings, the primary school and users of the Country Park and footpaths) are expected to be minimal and would relate to emissions from vehicles utilising the on-Site roads and parking areas. Traffic flows on these 'internal' roads area expected to be lower than the 500 AADT LDV (light vehicles) or 100 AADT HDV (heavy vehicles) used in the EPUK/IAQM guidance<sup>73</sup> as 'indicative criteria to proceed with an air quality assessment'. As such, air quality effects of development related operational and construction transport on proposed sensitive uses are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes in Air Quality from Emissions associated with Operational Equipment (such as Boiler Emissions) on both Existing and Proposed Sensitive Human and Ecological Receptors.***

- 7.15 The heating and cooling provision for the proposed dwellings, primary school and retail units are unlikely to be detailed prior to submission of the ES but will be new and of such a scale as to be unlikely to fall within the scope of the Medium Combustion Plant Directive<sup>74</sup>. As such, air quality effects of emissions from operational equipment are

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<sup>72</sup> <https://www.apis.ac.uk/>

<sup>73</sup> Table 6.2 Environmental Protection UK and Institute of Air quality Management: Land Use Planning and Development Control: Planning for Air Quality: January 2017.

<sup>74</sup> Directive (EU) 2015/2193 of the European Parliament and of the Council of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants.

not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes in Air Quality from Development Related Construction Traffic on Existing Sensitive Human Receptors***

- 7.16 As set out in the 'Transport and Access' (Chapter 6), construction vehicles are expected to be around 58 LDV and 16 HDV daily movements. This is significantly lower than the 500 AADT LDV (light vehicles) or 100 AADT HDV (heavy vehicles) used in the EPUK/IAQM guidance (Table 6.2) as 'indicative criteria to proceed with an air quality assessment'. As such, air quality effects of development related construction traffic on existing sensitive human Receptors not considered to be significant and will not be considered further in the EIA or reported in the ES. It should be noted however that controls on construction traffic, such as wheel washing, no idling and routing, will be provided within the CEMP.

***Dust and Emissions from Construction Activities***

- 7.17 Construction activities have the potential to result in nuisance and or adverse health effects due to dust deposition arising from on-site construction activities, resulting in the soiling of surfaces; visible dust plumes and elevated PM<sub>10</sub> concentrations as a result of dust generating activities on-site. Dust and particulate matter emission produced during construction activities (from both mobile and immobile machinery) will be controlled through the implementation of a CEMP. This CEMP will be informed by the Institute of Air Quality Management<sup>75</sup> (IAQM) guidance and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate, and set out requirements for ongoing monitoring and liaison with the local community, and HDC. These tertiary mitigation measures would be considered an integral part of the Proposed Development and considered as part of the PEMP. Nevertheless, a Construction Dust Assessment will be completed and form an appendix to the ES chapter.
- 7.18 As such, air quality effects of dust and emissions from construction activities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

**Effects Likely/Significant**

- 7.19 Table 7.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 7.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                                                                         | Receptor(s)                                       | Applicable Stage(s) |
|--------------------------------------------------------------------------------|---------------------------------------------------|---------------------|
| Changes in Air Quality associated with Development Related Operational Traffic | Existing Human Receptors (as shown on Figure 7.1) | Operation           |

<sup>75</sup> Institute of Air Quality Management (2024). Guidance on the Assessment of Dust from Demolition and Construction. Available at: Construction-Dust-Guidance-Jan-2024.pdf [Accessed: 17/04/2025].

## Assessment Methodology of Effects Likely/Significant

7.20 The following background surveys/studies have been/will be completed.

**Table 7.2: Background Surveys/Studies**

| Survey/Study/Analysis/<br>Evaluation                                        | Overview                                                                                        | Date of Completion |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------|
| <b>Ongoing or Pending</b>                                                   |                                                                                                 |                    |
| Nitrogen Dioxide diffusion<br>Tube Survey                                   | 6 months, 12 locations (see <b>Figure 7.1</b> )                                                 | July 2026          |
| 3 x Odour 'Sniffing' surveys<br>at each of the odour<br>sensitive locations | Wind direction dependant<br>(see <b>Figure 7.1</b> )                                            | April 2026         |
| Odour assessment<br>(separate report)                                       | Indicative assessment of the<br>effect of nearby odour sources on<br>the Proposed Development.  | May 2026           |
| Assessment of<br>development related<br>traffic on existing<br>receptors    | DMRB <sup>76</sup> calculations for NO <sub>2</sub> , PM <sub>10</sub><br>and PM <sub>2.5</sub> | May 2026           |
| Construction dust and<br>emissions assessment<br>(appendix to the ES)       | Indicative assessment of likely<br>construction effects to inform<br>controls and mitigation.   | May 2026           |

- 7.21 The assessment for the ES will comply with the basic methodology and calculation of magnitude as described in the IAQM Guidance<sup>77</sup>.
- 7.22 The nitrogen dioxide diffusion tube survey surveys will be completed to inform the baseline. The raw data and annualised and bias adjusted using the Defra Diffusion Tube.
- 7.23 With regard to the extent of the air quality assessment the road links and receptors to be considered in the calculations are shown on **Figure 7.1**, it is proposed that road links more than 2.5km of the Site would not need to be included. This would therefore exclude an assessment within the Storrington AQMA (which is not on a direct route from the Site), the Cowfold AQMA (which is in the process of being revoked) and the Pulborough area (which has temporarily high levels of traffic related pollutants due to the landslide) but would include the properties at Five Oaks which are expected to have the highest baseline levels of pollutants in the area and Newbridge Road, which is

<sup>76</sup> Design Manual for Roads and Bridges LA105 – Air Quality

<sup>77</sup> Environmental Protection UK and Institute of Air quality Management: Land Use Planning and Development Control: Planning for Air Quality: January 2017

expected to have the highest change in pollutant concentrations as a result of operational development traffic.

7.24 The scenarios proposed to be considered are as follows

- Baseline 2026;
- Baseline 2026 + Proposed Development; and
- Baseline 2026 + Proposed Development + Cumulative Projects.

7.25 The pollutants proposed to be assessed are nitrogen dioxide, PM<sub>10</sub> and PM<sub>2.5</sub>.

7.26 Data for the traffic flows, speeds and volumes will be provided by the appointed Transport consultant to inform the assessment.

7.27 As the effects of the development traffic are expected to be limited to localised receptors calculations regarding the magnitude of impact will be based on worst-case DMRB methodology utilising speed, distance and traffic flows, as opposed to full dispersion modelling, which would also account for meteorological effects. Receptors will be selected to represent all affected existing residential properties.

7.28 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

### **Limitations and Assumptions**

7.29 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- No effect of wind direction and meteorological conditions is included within the pollutant level predictions, making the assessment worst case.
- It is assumed that the 6-month diffusion tube monitoring January to July 2026 is suitably representative of a 12 month period.
- Traffic details are subject to the limitations and assumptions as stated within the Transport and Access chapter (**Chapter 6**).
- A sensitivity and uncertainty statement will be provided as part of the ES Chapter.

## 8. Noise and Vibration

### Technical Baseline

- 8.1 Noise on the Site is largely dominated by traffic noise with occasional noise from agricultural uses and limited areas affected by noise from the neighbouring recycling centre and sports pitches. **Figures 8.1** and **8.2** show the 'extrium'<sup>78</sup> noise map for Billingshurst and that daytime noise levels on the Site (closest to the A29) from traffic, are at around 55-59 dB L<sub>Aeq</sub> during the daytime and less than 40- dB L<sub>Aeq</sub> during the night, which are considered to be generally low to medium and typical for a partly rural area.
- 8.2 Permanent detectable sources of noise on or near the Site, are the following:
- The Billingshurst Household Waste Recycling site near the centre of the Site,
  - The existing sports facilities,
  - The potential permitted source of noise from the Limeburners Public House and Campsite however, this pub is now closed, but there is an application<sup>79</sup> for a Static Caravan Site pending. It is considered that if this site is developed into a static caravan park then there would not be noise sources other than usual domestic noise.
- 8.3 There is potential future noise from the consented but not constructed 'Focal Point' commercial scheme on land at Platts Roundabout, however it is noted that there is a proposed blank façade against the boundary of the Site.
- 8.4 There are not expected to be any significant sources of vibration on or around the Site.

### Proposed Scope of Assessment

- 8.5 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### Effects Unlikely/Not Significant

- 8.6 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.

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<sup>78</sup> <http://www.extrium.co.uk/noiseviewer.html>

<sup>79</sup> Horsham Planning Application DC/25/0700.

***Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Existing Human Receptors***

- 8.7 It is not expected that there will be significant effects of noise from these sources on existing residential properties, even from fixed plant or deliveries at night, as there is a minimum of either the A29, the A272 or a 100m distance between these noise sources and existing residents. However, Site Suitability Assessment that will include noise modelling from these sources will be undertaken and provided as part of a separate report supporting the planning submission, to set suitable limits and controls for these noise sources. Noise limits will be set in order to achieve either the BS8233<sup>80</sup> criteria for average noise levels, external  $L_{Amax}$  levels of 60 dB  $L_{Amax(15 \text{ minutes})}$  or Noise Rating Levels of NR25 as appropriate, in general accordance with the guidance provided within Horsham Council Planning Noise Advisory Document 2021 (PNAD21). As such, noise from operational use of the school, community hub, sports facilities, and commercial elements on existing sensitive human receptors is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Future Human Receptors***

- 8.8 There are a number of potential permanent noise sources associated with the development, including internal road and parking noise, noise from the proposed school, community hub and sports facilities together with potential noise from commercial elements. However, it is not expected that there will be significant effects of noise from these sources on the proposed residential properties (the effect of the Development on itself). Noise from fixed plant or deliveries at night from the commercial elements would not be detectable at the proposed dwellings as there is a minimum of either a 10m internal road or 10m distance between these noise sources and proposed dwellings. Irrespective of minimal noise effects noise modelling from these sources will be undertaken as part of a Site Suitability Assessment and provided separately as part of the planning submission, to set suitable limits and controls and mitigation (such as glazing, fencing and ventilation), if necessary, for these noise sources or the proposed dwellings. Noise limits will be set in order to achieve either the BS8233 criteria for average noise levels, external  $L_{Amax}$  levels of 60 dB  $L_{Amax(15 \text{ minutes})}$  or Noise Rating Levels of NR25 as appropriate, in general accordance with the guidance provided within PNAD21. As such, noise from operational use of the school, community hub, sports facilities, and commercial elements on future human receptors is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Vibration from existing, or Development Related Operational or Construction Piling and Traffic, Use of the Sports Facilities and Commercial Elements on Existing or Future Sensitive Human Receptors***

- 8.9 It is not expected that there will be significant effects of vibration from any of these sources. Vibration effects are typically only likely within 10-20m of the source and there are no existing or future receptors within 10m of any potential vibration source other than proposed dwellings close to internal roads, which, due to low volumes of traffic are not expected to be a significant source of vibration. It should also be noted that vibration from Heavy Goods Vehicles (HGV's) servicing the development, (either as

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<sup>80</sup> BS 8233:2014 - Guidance on sound insulation and noise reduction for buildings

part of the construction works or operational use) on the public highway, even where existing dwellings are close to the highway, such as in Five Oaks, should be precluded from planning controls. As such, all vibration effects of the development or on the development from any baseline sources are not considered to be significant and will not be considered further in the EIA or reported in the ES.

#### **Noise & Vibration Effects of Construction Activities**

- 8.10 Construction activities have the potential to result in nuisance and disturbance arising from occasional high levels of noise or vibration from construction activities, particularly if there is regular working at night or on weekends/public holidays. However, it is understood that there will be no regular noisy construction activities outside of 08:00 – 18:00 Mondays to Fridays and 09:00 to 13:00 Saturdays and therefore it is considered unlikely that there will be any significant noise or vibration effects from construction. However, indicative worst-case construction noise and vibration levels will be assessed, and a Construction Noise and Vibration Assessment will be submitted separately as part of the planning application to enable suitable mitigation and controls. Construction Noise and Vibration will be controlled through the implementation of a CEMP. This CEMP will be informed by methodology and best practice outlined in BS 5228<sup>81</sup> and will set out requirements for ongoing noise management, including use of temporary barriers, monitoring and liaison with the local community, and HDC. These tertiary mitigation measures would be considered an integral part of the Proposed Development and considered as part of the Environmental Management Plan. As such noise and vibration from construction activities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

#### **Effects Likely/Significant**

- 8.11 Table 8.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 8.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                         | Receptor(s)                                       | Applicable Stage(s) |
|--------------------------------|---------------------------------------------------|---------------------|
| Noise from Operational Traffic | Existing Human Receptors (as shown in Figure 8.3) | Operation           |
| Existing Noise (all sources)   | Future Human Receptors                            | Operation           |

#### **Assessment Methodology of Effects Likely/Significant**

- 8.12 The following background surveys/studies have been/will be completed.

<sup>81</sup> BS 5228-1:2009+A1:2014 : Code of practice for noise and vibration control on construction and open sites

**Table 8.2: Background Surveys/Studies**

| Survey/Study/Analysis/<br>Evaluation        | Overview                                                                                      | Date of<br>Completion |
|---------------------------------------------|-----------------------------------------------------------------------------------------------|-----------------------|
| <b>Ongoing or Pending</b>                   |                                                                                               |                       |
| Noise Survey                                | 7 day survey at 6 Short Term locations and 6 Long Term Locations (see Figure 8.3)             | February 2026         |
| Site Suitability Assessment                 | 3D Noise modelling of indicative noise from proposed uses and existing traffic noise          | March 2026            |
| Construction Noise and Vibration Assessment | 3D Modelling of worst-case construction noise sources and vibration calculations if required. | May 2026              |

- 8.13 The noise survey will be completed to inform the baseline and in accordance with BS 7445<sup>82</sup>.
- 8.14 The assessment for the ES will utilise 3D modelling using CADNA modelling software which based on the UK's Calculation of Road Traffic Noise methodology<sup>83</sup>, and ISO 9613-2:1996<sup>84</sup>.
- 8.15 With regard to the extent of the noise assessment (see Figure 8.3 for proposed road links and receptors to be included), it is proposed that road links more than 2.5km of the Site would not need to be included. This study area will therefore include the properties at Five Oaks and Newbridge Road (as shown in Figure 8.3), which are expected to have the highest change in noise levels as a result of operational development traffic.
- 8.16 The scenarios proposed to be considered are as follows
- Baseline 2026
  - Baseline 2026 + Proposed Development
  - Baseline 2026 + Proposed Development + Cumulative Projects
- 8.17 Data for the traffic flows, speeds and volumes will be provided by the Transport and Access consultant.
- 8.18 Receptors will be selected to represent

<sup>82</sup> BS 7445-1:2003 — Description and measurement of environmental noise. Guide to quantities and procedures.

<sup>83</sup> Calculation of Road Traffic Noise methodology, published by the Department of Transport (1988)

<sup>84</sup> ISO 9613-2:1996 Acoustics - Attenuation of sound during propagation outdoors - Part 2: General calculation method

- existing residential properties (see **Figure 8.3**),
  - the proposed school
  - footpaths and users of the country park
  - proposed dwellings
- 8.19 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.
- 8.20 Noise limits for both existing and proposed receptors will be set in order to achieve either the BS8233 criteria for average noise levels, external  $L_{Amax}$  levels of 60 dB  $L_{Amax(15 \text{ minutes})}$  or Noise Rating Levels of NR25 as appropriate, in general accordance with the guidance provided within PNAD21. Where appropriate noise levels at the proposed school will be referenced in accordance with the criteria outlined within the Department for Education Building Bulletin 93: Acoustic design of schools - performance standards.

### **Limitations and Assumptions**

- 8.21 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:
- Traffic inputs are subject to the limitations and assumptions set out within the Transport and Access section (**Chapter 6**).
  - Other development related noise sources, such as noise from parking, expected fixed plant, sports pitch or spectator noise or construction noise sources will be based on typical levels from similar uses, locations or sites.
  - Baseline noise levels will be subject to the assumed representativity of the baseline noise survey, which will inherently be a 'snapshot' in time and be dependant on localised conditions and meteorological effects together with access and security constraints of unattended equipment. Nevertheless, the survey will aim to be as representative as possible and any measurements during heavy rain, excessive wind, snow, fog or temperature inversions will be excluded from the presented average noise levels.
  - A sensitivity and uncertainty statement will be provided as part of the ES Chapter.

## 9. Biodiversity

### Technical Baseline

- 9.1 Tetra Tech has undertaken an updated desktop study and Extended Phase 1 / UK Habitat Classification (UK Habs) survey of the Site in 2025. A range of ecology surveys were completed in 2022, 2023 and 2025 which comprised bat roost inspection and emergence surveys (buildings and trees), bat activity surveys (automated static detectors and walked transects), bat trapping, breeding bird surveys, wintering bird surveys (non-breeding), dormouse presence/likely absence surveys, eDNA screening for great crested newts (GCN) of ponds, GCN population assessments, and reptile presence/likely absence surveys.
- 9.2 An Ecological Impact Assessment (EclA) for the receptors scoped out of the ES is provided in **Appendix 9.1** which also includes figures of survey locations and findings. As such, these should be read in parallel with this EIA Scoping Report. Receptors that have been scoped in will be assessed in the ES. Therefore, details of any surveys completed for these receptors are not included in this report.
- 9.3 Baseline surveys have been conducted on site; details of when and the type of surveys completed are provided in **Table 9.1** below.

**Table 9.1: Ecological Baseline Survey Types and Dates Completed**

| Survey type                                                                                                           | Survey date(s)                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Phase 1 Habitat survey                                                                                                | September 2023                                                                                                                                                                                  |
| Hedgerow Importance Survey                                                                                            | 8 <sup>th</sup> November 2023                                                                                                                                                                   |
| UK Habitat Classification survey (UKHab)                                                                              | 19th-21st May 2025                                                                                                                                                                              |
| Bat activity (static detector monitoring)                                                                             | Static monitoring period of 5-days once a month from April 2023 to October 2023                                                                                                                 |
| Preliminary roost assessment for bat                                                                                  | September and June 2025                                                                                                                                                                         |
| Bat emergence on the Pavilion clubhouse                                                                               | 31 <sup>st</sup> August 2023 with x2 updated surveys between June and September 2025                                                                                                            |
| Bat emergence surveys and endoscope inspection of trees assessed as likely to be impacted with bat roosting potential | Three emergence surveys were carried out on a tree T1 on the 7th and 27th of August, and 18 <sup>th</sup> of September. Endoscope inspections of potential PRF's were also conducted on tree T2 |
| Bat activity (transect)                                                                                               | One survey per month from April 2023 to October 2023                                                                                                                                            |

| Survey type                                          | Survey date(s)                                                                                                                                  |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Bat trapping (advanced survey technique)             | 22 <sup>nd</sup> – 24 <sup>th</sup> May 2023, 7 <sup>th</sup> & 8 <sup>th</sup> August 2023, 26 <sup>th</sup> - 28 <sup>th</sup> September 2023 |
| Hazel Dormouse survey                                | July-October 2022, then April -November 2023                                                                                                    |
| Breeding bird surveys                                | Five survey visits between April–June 2023                                                                                                      |
| GCN HSI and eDNA surveys                             | HSI: May 2022, updated May 2025<br>eDNA: June 2022                                                                                              |
| GCN presence / likely absence survey (WB15 and WB18) | Four survey visits between April – May 2023                                                                                                     |
| Reptile presence / likely absence surveys            | Refugia deployment: 6 <sup>th</sup> September 2023 and seven subsequent visits throughout September – October 2023                              |
| Nonbreeding bird surveys                             | October 2025, November 2025, December 2025, January 2026 with further survey due to be carried out in February 2026.                            |

9.4 The Extended Phase 1 / UK Habs and desktop study have found the following information to date:

- **Designated Sites:**
  - The nearest internationally designated site is **Mens Special Area of Conservation (SAC)** approximately 6.5km from Site which is designated for the Annex I habitat (Atlantic acidophilous beech forests) and Barbastelle bats *Barbastella barbastellus* as the sole qualifying species. Potential direct impacts from the development could include habitat disturbance or fragmentation, loss of functionally linked land, and increased noise and light pollution, and changes to local hydrology that may affect the sensitive habitats and bat populations.
  - **Ebernoe Common SAC** is located 6.6 to 12km from Site which is designated for Barbastelle and Bechstein's bats *Myotis bechsteinii*. Potential direct impacts from the development could include habitat disturbance or fragmentation, loss of functionally linked land, and increased noise and light pollution, and changes to local hydrology that may affect the sensitive habitats and bat populations.
  - The Site lies 150m west of one Site of Special Scientific Interest (SSSI), **Upper Arun SSSI**. The site is designated for its high-quality chalk river habitat, supporting a diverse range of aquatic plants, invertebrates, and fish species, including some of conservation concern. The proximity of the Site to this sensitive habitat means that the proposed development could pose risks such as increased surface water runoff, potential pollution, and

sedimentation, all of which may adversely affect the water quality and ecological integrity of the SSSI. Therefore, careful consideration of these potential impacts is critical within the ecological assessment to ensure appropriate mitigation measures are identified to safeguard the designated features.

- **Habitats:** The Site is dominated by arable fields as well as cattle grazed pasture. A parcel of modified grassland was identified as priority floodplain grazing pasture; this parcel is set to be enhanced, retaining its priority habitat classification, so has been scoped out of further assessment. Tree-lined hedgerows, both species-rich and species-poor, are also present within the Site. There are also ponds and wet ditches within the Site.
- **Species:** In lieu of data from detailed species surveys being undertaken between 2023 and 2025, the presence of protected and notable species have been outlined below:
  - **Roosting bats:** The clubhouse was initially assessed in 2022 as low suitability for roosting bats and no bat roosts were recorded during a single emergence survey undertaken in August 2022. Updated assessments in 2025 re-assessed the clubhouse as having moderate suitability and several trees were assessed as having Potential Roosting Features (PRFs)– Maternity potential. Subsequent emergence surveys undertaken in 2025 recorded no roosting bats within the clubhouse or trees.
  - **Foraging/commuting bats:** Automated static surveys in 2023 recorded seven species, predominantly attributed to pipistrelle species (51.1% of calls Common pipistrelle and 40.7% of calls Soprano pipistrelle). Low numbers of barbastelle calls were recorded during May, July and September, in the west and south of the Site. In addition, walked transect surveys were undertaken in 2023 and identified seven species, predominantly attributed to Common pipistrelle (71.1%). Barbastelle were identified on each of the three transects through call analysis and made up 0.26% of all bat calls. Finally, in 2023 bat trapping occurred using mist nets, harp traps, and acoustic lures. Results confirmed common and soprano pipistrelles, brown long-eared, and whiskered bats at the Site, although no barbastelle was detected. A small number of whiskered and unidentified Myotis species were recorded, indicating potential for rare Myotis presence but confirming barbastelle absence.
  - **Breeding Birds:** Following breeding bird surveys in 2023, a typical assemblage of farmland / woodland edge bird species were identified at the Site. This included red listed species such as skylark *Alauda arvensis*, yellowhammer *Emberiza citrinella*, nightingale *Luscinia megarhynchos* and linnet *Linaria cannabina*.
  - **Wintering Birds:** surveys are ongoing between October 2025 to March 2026.

- **Hazel Dormouse:** Presence/likely absence surveys in 2023 identified three nests which were attributed hazel dormouse *Muscardinus avellanarius*. These were located on the western hedgerow in the north of the site close to Pratt's Copse, one on the eastern boundary of the field south of Newbridge Road and one along the northern boundary of the Site.
- **Great crested newts:** Positive eDNA (environmental DNA) at two waterbodies: WB15 and WB18. Negative eDNA at: WB9, WB10, WB11 and WB14 (see **Appendix 9.1G**) GCN were not recorded in the first four visits of population assessments, and the ditches became too dry to continue the surveys, as such a low or transient population can be assumed.
- **Reptile:** Common lizard *Zootoca vivipara* and grass snake *Natrix helvetica* were recorded along the field margins and hedgerows during the 2023 surveys.
- [REDACTED]
- **Otter and water vole:** No targeted surveys for otter or water vole were undertaken. A single water vole record was returned by Sussex Biological Records Centre (SxBRC), however, no incidental records or evidence of these species were observed during surveys conducted on or near waterbodies within the Site. Therefore, it is considered unlikely that otters or water voles are present on the Site.
- **Invertebrates:** Data returned by SxBRC found a number of invertebrate species which could utilise the Site, however, field surveys found the Site would likely support common assemblages of invertebrates. The predominant habitats on Site were arable land, cereal crops, and modified grass, which is managed too frequently to allow plants to flower. These habitats are not suitable to support large assemblages of invertebrates. Though woodland parcels are present within the Site, these are to be appropriately buffered from development plans.

## Proposed Scope of Assessment

- 9.5 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### Effects Unlikely/Not Significant

- 9.6 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has

been provided below to support this. The following mitigation is committed to as part of **Chapter 4**:

- Existing green/blue corridors, including the River Arun in the west of the Site and hedgerows/treelines throughout the Site will not be significantly impacted by the development and will be adequately protected and buffered during and post development. The development also includes additional green/blue corridors through the Site and wider landscape.
- The post development landscaping will provide ecological enhancements through provision of sustainable drainage design (SuDS), biodiverse rich grassland, new hedgerows, orchard, woodland and tree planting which would uplift the value of the Site from the current intensive arable and pasture fields. The existing hedgerow and waterbodies on site will be retained and enhanced overall.
- The enhancement measures will provide new areas of habitats of wildlife benefit. The new habitat will provide valuable habitat to protected and priority species and would likely result in the development achieving the required +10% BNG, as per local policy (National Planning Policy Framework 2023).
- A sensitive lighting design will be delivered (dark corridors and low-glare fittings) to avoid disturbance to bats and other light-sensitive fauna.

9.7 Tertiary measures committed to at this stage and included in the PEMP are:

- Pre-commencement species checks, and updated surveys will be undertaken where required (timed to inform works and confirm presence/absence).
- Vegetation clearance and vegetation management will only occur outside the bird breeding season and sensitive periods for other species (e.g. reptiles, GCN, dormouse).
- An Ecological Clerk of Works (ECoW) or suitably qualified ecologist will supervise clearance and initial works and to deliver a site-specific watching brief.
- Protective exclusion/fencing will be installed around retained habitats and sensitive features during construction.
- Temporary habitat protection measures and safe working practices will be implemented (e.g., covering/exclusion of trenches, stockpile management, staged clearance).
- Standard precautionary mitigation will be implemented for reptiles/hedgehogs (suitable soft-fencing, hand-searching by an ecologist, translocation only where specifically required and licensed).
- Relevant legislation and best-practice guidance (e.g., Protected Species licensing where required) will be complied with.

- Ongoing liaison will be undertaken with statutory bodies and local authorities. Proportional monitoring/reporting will be undertaken during construction and early post-construction (as set out in the PEMP).

9.8 These tertiary measures are standard practice, are documented within the PEMP and be documented in the EMP which will support the ES. The CEMP will specify responsibilities (e.g., contractor and ECoW), timings (pre-commencement checks, measures during construction, and monitoring during the defined post-construction period) and monitoring/reporting requirements.

### ***Disturbance /Degradation of Habitats***

#### ***Loss of habitats***

9.9 The Site is dominated by arable fields and cattle-grazed pasture, (including areas of floodplain grazing marsh), habitats of low ecological value at the site level. Treelines, hedgerows, and wet ditches are present, with most of them retained and appropriately buffered, with only small losses to allow for new access roads into the Site. The main development impacts predominantly arable land, with plans to deliver over 10% Biodiversity Net Gain. Therefore, habitat loss is minimal and unlikely to be significant and will not be considered further in the EIA or reported in the ES.

#### ***Loss of water vole and otter habitat***

9.10 Habitats of low value for water voles and otter in the form of seasonally wet ditches were present within the main development areas which will be appropriately buffered. Therefore, there is no loss of water vole and otter habitat, and this will not be considered further in the EIA or reported in the ES.

#### ***Loss of roosting bat habitat***

9.11 No roosting bats were identified in buildings or trees at the Site and therefore are considered likely absent. Therefore, there is no loss of roosting bat habitat, and this will not be considered further in the EIA or reported in the ES.

#### ***Loss of hazel dormouse nests and supporting habitat***

9.12 All the areas where hazel dormouse were recorded will be retained as set out in **Chapter 4**. Whilst a small amount of dormouse habitat <100m will be lost to facilitate access, overall, the Proposed Development will provide an increase in available habitat and connectivity across the Site through hedgerow and woodland planting and enhancement. Therefore, there will be no loss of dormouse nests and the loss of supporting habitat is not considered to be significant and will not be considered further in the EIA or reported in the ES.

#### ***Loss of GCN habitat***

9.13 Though two positive eDNA results were found from waterbodies on site, GCN were not recorded in the first four visits of population assessments, and the ditches became too dry to continue the surveys. As such, it is assumed that if GCN are present on site, the population is small in size, or transient in nature. Proposed development plans seek to

retain all waterbodies on site, and buffer marginal vegetation which may be utilised as terrestrial habitat. Therefore, there will be no loss of GCN habitat, and this will not be considered further in the EIA or reported in the ES.

Loss of reptile habitat and disturbance to reptiles

- 9.14 Reptiles were recorded along the field margins and hedgerows. The majority of these habitats will be retained as part of the Proposed Development. Habitat creation and enhancement will increase suitable habitat for reptiles. Therefore, any losses are unlikely to be considered significant and will not be considered further in the EIA or reported in the ES.

[REDACTED]

- 9.15 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Effects Likely/Significant**

- 9.16 Table 9.2 below outlines the effects (and associated receptor(s)) that are likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 9.2: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                                                                                                                                                                          | Receptor(s)                                                                                                                                        | Applicable Stage(s)           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| Disturbance to wildlife (noise, light, human activity), water pollution, hydrological changes, introduction of invasive species, and loss of land functionality.                | Upper Arun SSSI                                                                                                                                    | Construction                  |
| Increased recreational activity, nutrient loading, and loss of functionally linked habitats affecting water quality and ecological integrity, introduction of invasive species. | Upper Arun SSSI                                                                                                                                    | Operation                     |
| Disturbance to wildlife (noise, light, human activity), water pollution, hydrological changes, introduction of invasive species, and loss of land functionality.                | Mens Special Area of Conservation (SAC) – approx. 6.5 km from the Site; direct impacts likely minimal but construction-phase disturbance possible. | Construction (low likelihood) |

| Effect                                                                                                                                            | Receptor(s)                                                                                                                  | Applicable Stage(s)      |
|---------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|                                                                                                                                                   | Ebernoe Common SAC – 6.6 to 12 km from Site;<br><i>Distance reduces risk of direct impacts but indirect effects possible</i> |                          |
| Potential indirect impacts including increased recreational pressure, habitat fragmentation, and disturbance to bat commuting/foraging corridors. | Mens SAC                                                                                                                     | Operation                |
| Indirect impacts such as increased recreational pressure, land use change nearby, and fragmentation of bat habitat and commuting routes.          | Ebernoe Common SAC                                                                                                           | Operation                |
| Habitat loss/fragmentation, disturbance, killing/injury                                                                                           | Foraging and Commuting bats                                                                                                  | Construction / Operation |
|                                                                                                                                                   | Protected and priority species: breeding and wintering birds.                                                                | Construction             |
| Habitat loss and supporting habitats not being appropriately managed.                                                                             | Protected and priority species: breeding and wintering birds.                                                                | Operation                |

### Assessment Methodology of Effects Likely/Significant

- 9.17 The following background surveys/studies have been/will be completed (Table 9.3).

**Table 9.3: Background Surveys/Studies**

| Survey/Study/Analysis/Evaluation                           | Overview                                                                    | Date of Completion        |
|------------------------------------------------------------|-----------------------------------------------------------------------------|---------------------------|
| <b>Completed</b>                                           |                                                                             |                           |
| Desk study & Local biological records search (LERC, Magic) | Identify designated sites, recorded EPS & priority habitats                 | May 2025 and January 2026 |
| UKHab Survey                                               | Map habitats & identify features of value (hedgerows, veteran trees, ponds) | May 2025                  |

| Survey/Study/Analysis/Evaluation      | Overview                                                                                                                                                                                                                                                                                                                                                     | Date of Completion                           |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| Breeding Bird Surveys                 | Included territory mapping and point counts to determine breeding bird assemblage and sensitive species.                                                                                                                                                                                                                                                     | June 2023                                    |
| <b>Pending</b>                        |                                                                                                                                                                                                                                                                                                                                                              |                                              |
| Wintering Bird Surveys (Non-Breeding) | Determine breeding bird assemblage and sensitive species. Surveys ongoing between October 2025 to March 2026                                                                                                                                                                                                                                                 | To be completed – anticipated for March 2026 |
| Shadow Habitat Regulation Assessment  | Shadow HRA uses baseline survey data, site proximity, species sensitivities, and planned mitigation to screen for potential impacts on designated sites. It informs the planning and design process by identifying risks early and ensuring that the development complies with the Habitats Regulations, thereby safeguarding protected habitats and species | To be completed – anticipated for March 2026 |

### Proposed Assessment Methodology for Likely Significant Effects

- 9.18 The evaluation and assessment of ecological effects will be undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment (EcIA). These guidelines emphasise professional judgment supported by relevant information and do not prescribe fixed definitions for assigning value to habitats and species. Our approach will therefore apply CIEEM-approved terminology and protocols, interpreted consistently with EIA terminology and methodology.
- 9.19 The ecological value of each receptor will be assessed within a clearly defined geographical context, ranging from international, national, and regional levels to local and site-specific scales. Considerations will include designated sites and protected features, biodiversity importance, potential ecological value, and supporting or secondary ecological functions.

- 9.20 Following identification of ecological features likely to be affected by the Proposed Scheme, a transparent and systematic approach will be adopted to determine the significance of impacts. This entails characterising the nature, extent, and duration of impacts on ecological structure and function, and assessing whether these impacts are significant in ecological terms.
- 9.21 The EcIA will employ the standard EIA approach to impact assessment, comprising:
- **Receptor Sensitivity:** categorised as High, Medium, Low, or Negligible;
  - **Magnitude of Change:** categorised as Large, Medium, Small, or Negligible; and
  - **Level of Effect:** categorised as Major, Moderate, Minor, or Negligible.
- 9.22 The determination of likely significant effects will be based on professional judgment, informed by the sensitivity of receptors and magnitude of impacts. The assessment will be guided by relevant standards and legislation, including:
- CIEEM EcIA Guidelines;<sup>85</sup>
  - British Standard BS 42020 (Biodiversity – Code of Practice for Planning and Development)<sup>86</sup>;
  - Bat Conservation Trust guidance<sup>87</sup>;
  - Natural England licensing guidance; and
  - Applicable statutory requirements.
- 9.23 **Study Area:** The ecological study area will be defined to encompass all habitats and species potentially affected by the Proposed Development, including designated sites within a minimum radius of the Site boundary. Specific survey extents and study area boundaries will be detailed in subsequent survey reports.
- **Appendix 9.1:** Ecological Impact Assessment (ECIA) – Receptors Scoped Out of the ES.
  - **Appendix 9.1i:** Ecology Survey Data Validity Note.
- 9.24 **Lighting assessment:** The light survey will be completed to inform the baseline and in accordance with principles outlined in ILPGN01/21. The assessment will be undertaken

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<sup>85</sup> Chartered Institute of Ecology and Environmental Management (CIEEM) (2024) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.3. Winchester: CIEEM. Available at: <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/> (Accessed: 19 November 2025).

<sup>86</sup> British Standards Institution (2013) BS 42020:2013 Biodiversity – Code of practice for planning and development. London: BSI Standards. Available at: <https://landingpage.bsigroup.com/LandingPage/Standard?UPI=000000000030258704> (Accessed: 19 November 2025).

<sup>87</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). London: Bat Conservation Trust. ISBN 978-1-7395126-0-6. Available at: <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-4th-edition> (Accessed: 19 November 2025).

in accordance with the principles outlined in the Institute of Lighting Professionals Guidance GN08 Bats and Artificial Lighting 2025 (ILPGN08/25)

- 9.25 With regard to the extent of the lighting assessment, this will be determined by the details of the foraging and activity locations of the light sensitive bat species, but will not extend beyond 500m of the Site.
- 9.26 Light surveys will be representative of a snapshot of conditions on site during the survey, recognising that meteorological effects, moon phase and seasonality can effect lighting levels. However, where possible lighting measurements, nightscape photographs and sky quality measurements) will be undertaken in low moonlight and dry conditions.
- 9.27 Any footpath, retail signage, retail security or car parking lighting levels will be based on typical levels from similar uses, locations or sites. A sensitivity and uncertainty statement will be provided as part of the ES Chapter.
- 9.28 **Consultation and Coordination:** Consultation with local wildlife groups and the local planning authority (LPA) is ongoing and will inform the development of the scheme. This iterative engagement is expected to guide any necessary refinements or improvements to ensure appropriate ecological considerations are addressed throughout the project lifecycle
- 9.29 **Mitigation Integration:** Mitigation relating to scope out receptors during the EIA process will be documents in species specific reports and managed through the PEMP, Environmental Management Plan (EMP), and Construction Environmental Management Plan (CEMP).

### Limitations and Assumptions

- 9.30 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:
- Baseline surveys were conducted from 2022 to 2023 and updated as needed in 2025/2026 to provide an early and robust baseline for design. A worst-case, precautionary assessment will be undertaken, assuming the presence of protected and notable species and defining mitigation accordingly. A supplementary Data Validity note is included as **Appendix 9.11** and should be read alongside this report.
  - Aquatic surveys on the River Arun have not been carried out to form a baseline upon which impacts can be measured against. The river lies outside the curtilage of the site; therefore, it is deemed appropriate to assess possible impacts resulting from the proposed development without conducting species specific aquatic surveys, so this does not constitute a significant limitation to the development.
  - Further refinement and formal justification of this scope will be required as final technical appendices, and the ES chapter are completed. If the required survey updates, detail on measures, or evidence of securement cannot be

demonstrated to the necessary level of confidence, other relevant receptor(s) will be scoped in for full assessment.

- Two boundaries are shown in our figures (See **Appendix 9.1, Figure 1**) the survey boundary which includes all areas surveys and the Site boundary which is a larger boundary that includes all potential permanent and temporary works (see **Chapter 4**). Additional targeted surveys will be completed, to support future planning application and address any residual risks. Due to their small scale and peri-urban setting, these are unlikely to affect the overall assessment.

## 10. Landscape and Visual Amenity

### Technical Baseline

#### Landscape Baseline

- 10.1 The Site lies within the Low Weald (National Character Area 121) landscape – a low-lying clay vale rising from the River Arun (10m AOD) and gently undulating to around 50m AOD north of the Billingshurst. The area is predominantly pastoral and arable, characterised by an intricate pattern of small to medium fields enclosed by hedgerows, ancient woodland, shaws, and riparian tree lines along watercourses. It is generally an enclosed landscape with occasional long views towards the South Downs.
- 10.2 The river valley landform is a defining feature of the Site and its wider context. The gently undulating terrain rises north and east from the River Arun, with smaller tributary valleys to the north of Billingshurst limiting opportunities for long-distance views.
- 10.3 The local landscape character is informed by two existing studies: West Sussex Landscape Character Assessment (LCA)<sup>88</sup> and Horsham District LCA<sup>89</sup>.
- 10.4 According to the West Sussex LCA, the Site is covered by three Landscape Character Areas (LCA), as shown in **Figure 10.3**:
- LW5 Southern Low Weald – this LCA covers the southern part of the Site and is a predominantly low-lying, ranging from flat to gently undulating, with an intricate mix of small pastures and larger arable fields. Hedgerows form a variable network, fragmented and depleted in places, and are often punctuated by mature oak trees, some exhibiting stag-headed forms. Occasional long views extend towards the South Downs and the High Weald, while the western area retains a remote rural character. In contrast, the eastern part shows suburban influences, along with visible roads and pylons.
  - LW6 Central Low Weald – this LCA covers the northern, central and some western parts of the Site and is gently undulating, comprising predominantly small to medium-sized pasture fields enclosed by woodlands, shaws, and hedgerows, alongside some larger arable fields. It features a dense cover of ancient broadleaved woodlands and plantations, interspersed with small stream valleys draining towards the Rivers Adur and Arun. The area is crossed by major north–south transport corridors, including both road and rail links.
  - LW3 Upper Arun Valley – this LCA covers the westernmost part of the Site, west of the River Arun, and comprises narrow valleys with gently undulating sides and lush valley bottoms containing small, irregular pastures. Occasional curving strips

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<sup>88</sup> WSCC (2003) Landscape character assessment of West Sussex. Available at: <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/> [Accessed: 30 Nov 2025]

<sup>89</sup> CBA (2003) Horsham District Landscape Character Assessment. Final Report. Available at: <https://www.horsham.gov.uk/planning/planning-policy/evidence-base/landscape-character-assessment> [Accessed: 30 Nov 2025]

of woodland occupy the valley slopes, while rivers and streams follow tightly meandering courses with steep banks. Scattered small farms are located on elevated valley sides. The area retains a predominantly rural and unspoilt character, though urban edge influences near Horsham and some road and aircraft noise are evident in places. Distinctive stone and brick bridges add to the local character.

10.5 The Site and the adjoining landscape also reflect characteristics from several Horsham District Landscape Character Areas, as shown in **Figure 10.3**:

- LCA G3: Slinfold and Five Oaks Wood Farmlands – A gently undulating wooded landscape with small-hedged pastures and some larger arable fields. Extensive coppice woodland occurs in irregular blocks, with glimpsed views across the Arun Valley through hedgerow gaps. The area is largely rural, though influenced by the A29/A272 corridors and occasional aircraft noise. Sensitivity to change is moderate due to localised loss of character along the A29 corridor.
- LCA J1: Billingshurst and North Heath Farmlands – Gently undulating landform with small to medium fields enclosed by frequent hedgerows, copses, and woodland blocks. Numerous mature field trees follow hedgerows and lanes. The landscape is semi-enclosed with some longer views and retains a strongly rural character away from the A29.
- LCA P1: Upper Arun Valleys – Narrow valleys with undulating sides and lush valley bottoms containing small, irregular pastures. Occasional woodland strips occur on valley slopes, and rivers and streams follow tightly meandering, steeply banked courses. The area is mostly rural and unspoilt, though affected by urban edge influences near Horsham and some road and aircraft noise.

10.6 In terms of the Billingshurst settlement character, the key features include St Mary’s Church on an elevated green above the High Street with a prominent wooden spire, large modern housing estates extending to the bypass, and extensive playing fields and recreation areas.

10.7 The Horsham District Landscape Capacity Assessment 2020<sup>90</sup> indicates that the Site has some capacity for development, provided that proposals are appropriately scaled and avoid sensitive landscape features such as elevated ridges, mature hedgerows, and the River Arun setting.

10.8 Newbridge Park’s northern and western areas fall within Zone 4, Area 51: Land North West of Billingshurst. This area is assessed as having a moderate overall landscape capacity for medium-scale housing and a low–moderate capacity for large-scale housing. Key sensitivities include the gently undulating ridge and valley landform, the medium-scale pattern of hedgerowed pasture and arable fields, and distant views to the South Downs. Visual sensitivities relate to the openness of larger fields and the sloping valley landform. Landscape value is considered low–moderate due to urban

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<sup>90</sup> HDC (2020) Horsham District Landscape Capacity Assessment. Rev B. Available at: [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0015/80502/Landscape-Capacity-Study-2020.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0015/80502/Landscape-Capacity-Study-2020.pdf) [Accessed: 30 Nov 2025]

influences, the A29 bypass, and proximity to playing fields and modern agricultural practices. Development should be carefully designed to avoid intrusion into the wider open countryside.

- 10.9 The southern, central, and western parts of Newbridge Park coincide with Zone 4, Area 52: Land West of Billingshurst. This area shares similar capacity ratings, with moderate capacity for medium-scale housing and low–moderate capacity for large-scale housing. Sensitivities include the gently undulating ridge and valley landform, a strong hedgerow and tree network, and visibility from higher ground despite existing enclosure. Landscape value is again low–moderate due to the influence of the A29. Development should respect these sensitivities and avoid creating the perception of encroachment into the surrounding countryside.
- 10.10 The Site and its immediate context are not covered by any landscape designations. South Downs National Park (SDNP) boundary is located approximately 3 km to the southwest of the Site (at the narrowest point).
- 10.11 There are several Public Rights of Way (PRoW) to the west and north of Billingshurst and Wey-South Path follows the course of the River Arun. The PRoW within the study area is shown in **Figure 10.2** (ref: PA02). The southern part of the Site (south of Newbridge Road) contains three PRoW (PA42, 1311, 1312), and the central part of the Site, lying between Rowner Road and Newbridge Road, is bisected by PRoW 1327. There are two PRoW crossing the central-northern part of the Site (including Jubilee Fields): 1326 and 1335.

#### **Visual Baseline**

- 10.12 A ZTV (**Appendix 10.1**) was prepared in November 2025<sup>91</sup> for the Proposed Development that assumed 15 metres Above Ground Level (AGL) maximum development height across the entire built development area for the Proposed Development (as shown in **Figure 1.1**). Two types of analysis have been carried out:
- ‘Bare ground’ – ZTV analysis up to 5km from the Site which does not include the screening effects of buildings or vegetation in the study area;
  - ‘Visual buffers’ – calculation based on 2m EA LiDAR DTM, which includes the screening effects of buildings and vegetation in the study area. This scenario is the most likely in terms of actual visibility as it takes account of significant areas of vegetation.
- 10.13 ZTV analysis indicates that the Proposed Development would be primarily visible within farmland areas up to approximately 1 km from the Site, with only limited glimpses beyond this distance to the west. To the east, views are screened by the existing urban form of Billingshurst, while to the west, visibility is mainly from the shallow east-facing slopes of the River Arun. To the north and south the Site is screened by woodland areas, which is clearly demonstrated by the ZTV sequence – see Maximum Woodland Heights used in Visual Buffers Calculation (**Appendix 10.1**).

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<sup>91</sup> MSE/DD (2025) Calculation of Theoretical Visibility ZTV/ZVI. Newbridge Park, West of Billingshurst. 15m Maximum Height.

10.14 Generally, the visual envelope falls into two categories as set out below:

- Direct and partially filtered views into the Site alongside or in proximity to the Site boundaries from surrounding roads, public rights of way and dwellings at the settlement edge of the village;
- Largely screened views behind layers of field boundary hedgerows and woodland associated with surrounding rural lanes and public rights of way within the wider landscape context.

### **Proposed Scope of Assessment**

10.15 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### **Effects Unlikely/Not Significant**

10.16 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

***Changes to character and the setting of the national landscape; Changes to views out from the national landscape; Changes to night-time views from the national landscape [South Downs National Park, visual receptors within the national park, including recreational walkers]***

10.17 The South Downs National Park (SDNP) has been entirely scoped out as a receptor from the EIA due to no likely significant impact on its landscape character or visual amenity of its users.

10.18 The SDNP is located to the west of the Site - approximately 2.9km from the Site and beyond - and whilst the most elevated parts of the SDNP are located within the theoretical ZTV ('bare earth'), views of the Proposed Development are likely to be barely perceptible, which is supported by the following evidence:

- LiDAR-based ZTV with visual barriers (**Appendix 10.1** Pg 6) shows that vegetation significantly limits any views of the Site beyond 1.5km from its boundary, and that includes any development up to 15 metres above ground level.
- The impact of woodlands on views from peripheries of the SDNP (between 3 and 5km from the Site boundary) is illustrated by Views 1, 2 and 3 (see **Figures 10.20 (ref:PA20)** and **Figure 10.21 (ref: PA21)**), which demonstrate that Billingshurst and the surrounding land are completely obscured by vegetation in typical views from this area. Furthermore, there are no significant hills in this area, except private land at Toat Monument and the landmark itself (occasionally accessible to the public at owners' discretion). The landmark is located 4.75km from the

nearest Site boundary and if small parts of the Proposed Development had a potential to be in the line of sight from top of the landmark, the Proposed Development would be barely perceptible from this distance.

- Analysis of views towards the SDNP from the Site and its surroundings (reverse assessment) clearly demonstrates that the visibility of the SDNP is very low (only the highest peaks are visible) and buildings will not be perceptible from the distance of more than 3km. This is illustrated by photograph from Viewpoint 10 (**Figure 10.14** (ref:PA14), taken from the elevated part of the Site westwards, as well as Viewpoints 14 and 15 (**Figures 10.11** (ref:PA11) and **Figure 10.12** (ref:PA12), respectively).
- In LVIA, any views of residential developments beyond 5km distance are normally not considered in assessments, as buildings become imperceptible at this distance (this would not apply to different forms of development, such as wind farms or large energy infrastructure). View 4, as illustrated in **Figure 10.21** (ref: PA21), illustrates the nature of long-distance views from the SDNP (7.5km from the Site boundary). It clearly demonstrates that a housing development would have no potential for any significant effect on landscape character and visual amenity in the long distance.
- As defined by the SDNP Viewshed Study<sup>92</sup>, there are three Representative Viewpoints within 10km of the Site: VP18 Petworth House and Park<sup>93</sup>, VP59 Hesworth Common<sup>94</sup>, and VP60 Pulborough Gun<sup>95</sup>. Viewshed analysis for these viewpoints shows that no development below 50m above ground level would be theoretically visible from any of those important viewpoints.

10.19 Night-time lighting which would be introduced as part of the Proposed Development will be built in accordance with a Lighting Strategy prepared according to technical standards/guidance<sup>96</sup>, would not affect the landscape character of the SDNP itself and any added light glow would be seen in the context of Billingshurst.

10.20 Therefore, changes to character and the setting of the national landscape; changes to views out from the national landscape and changes to night-time views from the national landscape to the landscape character / setting of the South Downs National Park and visual receptors within the national park, including recreational walkers are not considered to be significant and will not be considered further in the EIA or reported in the ES.

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<sup>92</sup> LUC (2015) South Downs National Park: View Characterisation and Analysis. Final Report Prepared by LUC on behalf of the South Downs National Park Authority.

<sup>93</sup> Viewshed map for VP18 is available at <https://www.southdowns.gov.uk/wp-content/uploads/2015/11/VP18-Petworth-House-and-Park.pdf> and was accessed on 20 January 2026

<sup>94</sup> Viewshed map for VP59 is available at <https://www.southdowns.gov.uk/wp-content/uploads/2015/11/VP59-Hesworth-Common.pdf> and was accessed on 20 January 2026

<sup>95</sup> Viewshed map for VP60 is available at <https://www.southdowns.gov.uk/wp-content/uploads/2015/11/VP60-Pulborough-Gun-Emplacement.pdf> and was accessed on 20 January 2026

<sup>96</sup> Institution of Lighting Professionals (ILP) Guidance 2021 – ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01-21)

***Changes in views and visual amenity [all visual receptors beyond 1km from the Site boundary]***

- 10.21 As demonstrated by the LiDAR based ZTV with visual barriers (**Appendix 10.1 Pg 6**) views of the Site (and the Proposed Development) from areas located more than 1km away from the Site boundary are very limited. While glimpses of rooftops may be possible in winter months from distant viewpoints, such changes would be barely perceptible and would affect a very small geographical area. This, in turn, would result in a negligible magnitude which would not result in a significant effect, even for the most sensitive visual receptors, such as recreational walkers on PRoW or local residents.
- 10.22 Therefore, changes to views and visual amenity to all visual receptors beyond 1km from the Site boundary are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes in landscape character [LCA beyond 1km from the Site, including LW2 North Western Low Weald]***

- 10.23 As demonstrated by the LiDAR based ZTV with visual barriers (**Appendix 10.1 Pg 6**) and by the visual survey in LVBR 2024 there are no material views of the Site (and the Proposed Development) from areas located more than 1km away from the Site boundary. While glimpses of rooftops may be possible in winter months from distant viewpoints, such changes would be barely perceptible and would affect a very small geographical area. This, in turn, would result in a negligible magnitude which would not result in a significant effect on landscape character. Most of the LW2 North Western Low Weald is located west of the local ridge immediately to the west of the River Arun, which will obscure most views of the Proposed Development.
- 10.24 Therefore, changes to landscape character of the LCA beyond 1km from the Site, including LW2 North Western Low Weald, are not considered to be significant and will not be considered further in the EIA or reported in the ES.

**Effects Likely/Significant**

- 10.25 **Table 10.1** outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 10.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                               | Receptor(s)                                                                                                                                                  | Applicable Stage(s)      |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Changes to Site character / features | Landform; land use; Green Infrastructure and recreational Public Open Space, landcover (hedgerows and tree cover); and built form                            | Construction / Operation |
| Changes to landscape character       | Local landscape up to 1km from the Site including: <ul style="list-style-type: none"> <li>LW3 Upper Arun Valley;</li> <li>LW5 Southern Low Weald;</li> </ul> | Construction / Operation |

| Effect                                    | Receptor(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicable Stage(s)      |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|                                           | <ul style="list-style-type: none"> <li>LW6 Central Low Weald.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                          |                          |
| Changes to Billingshurst townscape        | Townscape character of Billingshurst                                                                                                                                                                                                                                                                                                                                                                                                                                              | Construction / Operation |
| Changes to local views and visual amenity | Groups of people within 1km of the Site represented by Viewpoints 1-28 as shown in <b>Figure 10.1</b> (ref:PA01) (locations) and <b>Figures 10.4-10.19</b> (ref:PA04-PA19) (viewpoint panoramas). This includes: walkers on Way-South Path, users of local PRow (recreational walkers, equestrians), motorists on local roads; cyclists, residents, visitors to local landmarks/key historic assets/formal viewpoints, users of sports facilities, people at their place of work. | Construction / Operation |

#### ***Sensitive Receptors***

10.26 In line with **Table 10.1** and following consultation with the HDC landscape officer, a total of 28 viewpoints have been identified for assessment as part of an LVIA. The proposed viewpoint locations are overlaid onto a ZTV and are shown in **Figure 10.1** (ref: PA01). Viewpoint photographs are shown in **Figures 10.4-10.19** (ref: PA04-PA19). They include:

- Viewpoint 1: Rowner Road, junction with Newbridge Road, looking north;
- Viewpoint 2: Newbridge Road (A272), junction with Lordings Road, looking south-east;
- Viewpoint 3: Newbridge Road (A272), looking north and south-west;
- Viewpoint 4: Footpath (PRow) P42 at campsite corner, looking south-east;
- Viewpoint 5: Footpaths (PRow) 1311 and 1312, looking north;
- Viewpoint 6: Footpath (PRow) 1311, looking north-west;
- Viewpoint 7: Footpath (PRow) 1313, looking north;
- Viewpoint 8: Footpath (PRow) 1313, looking north;
- Viewpoint 9: Platts Roundabout (A272) looking south-west;
- Viewpoint 10: Newbridge Road West, looking south-west and north-west;
- Viewpoint 11: A29 overbridge and footpath 1335 (PRow) to Jubilee Fields, looking north-west;

- Viewpoint 12: Footpath 1335 (PRoW) within Jubilee Fields, looking west;
- Viewpoint 13: Hiland Roundabout (A29), looking north-west;
- Viewpoint 14: Stane Street at business park, looking south-west;
- Viewpoint 15: Stane Street near PMW building, looking south-west;
- Viewpoint 16: Footpath (PRoW) 1331, looking south;
- Viewpoint 17: Bridleway (PRoW) 1333, looking south-east;
- Viewpoint 18: Footpath (PRoW) 1335-1, looking south;
- Viewpoint 19: Footpath (PRoW) 1357, looking south-west and west;
- Viewpoint 20: Rowner Road, looking south;
- Viewpoint 21: Rowner Road lay-by, looking south;
- Viewpoint 22: Wey-South Path (PRoW 1304-1), looking north-east;
- Viewpoint 23: Newbridge Road (A272) / Wey-South Path (PRoW 1304-1), looking east;
- Viewpoint 24: Wey-South Path (PRoW 1304-1), looking east;
- Viewpoint 25: Wey-South Path (PRoW 1304-1), looking south-east;
- Viewpoint 26: Bridleway (PRoW) 771, looking south-east;
- Viewpoint 27: Wey-South Path / Bridleway (PRoW 1330), looking south-east; and
- Viewpoint 28: Footpath (PRoW) 790, looking east.

## Assessment Methodology of Effects Likely/Significant

10.27 The following background surveys/studies have been/will be completed.

**Table 10.2: Background Surveys/Studies**

| Survey/Study/Analysis/<br>Evaluation                                                                 | Overview                                                                                                  | Date of Completion |
|------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------|
| <b>Completed</b>                                                                                     |                                                                                                           |                    |
| Deacon Design (2024)<br>Newbridge Park,<br>Billingshurst. Landscape<br>and Visual Baseline<br>Report | High-level analysis of landscape<br>and visual baseline for the<br>Newbridge Park Promotional<br>Document | 2020, updated 2024 |

| Survey/Study/Analysis/<br>Evaluation                                                    | Overview                                                                                                                                       | Date of Completion                                      |
|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| MSE/ Deacon Design (2025) Calculation of Theoretical Visibility ZTV/ZVI (Appendix 10.1) | Detailed ZTV/ZVI analysis of theoretical visibility (without and with visual buffers) for a 15m AOD scenario based on EA and Defra 2m DTM data | 2025                                                    |
| <b>Pending</b>                                                                          |                                                                                                                                                |                                                         |
| Updated visual survey of the Site and its surroundings                                  | Updated visual survey for the new Site boundary and Proposed Development taking account of all recent changes in views                         | Winter and Summer 2026                                  |
| Landscape and Visual Impact Assessment (LVIA) – to be appended to the ES.               | Detailed LVIA of the Proposed Development                                                                                                      | Summer / Autumn 2026 (depending on the design fix date) |

#### ***Guidance, process***

10.28 The Landscape and Visual Impact Assessment (LVIA) will determine the likely effects of the Proposed Development on the existing landscape and visual receptors within the study area.

10.29 The LVIA will assess the effects on:

- Landscape as a resource (including its character and physical landscape elements/features); and
- Views and visual amenity experienced by visual receptors (people).

10.30 This assessment methodology for assessing landscape and visual effects is based on the following best practice guidance:

- Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3)<sup>97</sup>;
- An Approach to Landscape Character Assessment, Natural England<sup>98</sup>;
- Landscape Institute (2013) Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals<sup>99</sup>;
- Landscape Institute (2013) GLVIA3 Statement of Clarification 1/13<sup>100</sup>;

<sup>97</sup> Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment 3rd Edition

<sup>98</sup> Natural England (2014) An Approach to Landscape Character Assessment, Natural England

<sup>99</sup> Landscape Institute (2013) Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals

<sup>100</sup> Landscape Institute (2013) GLVIA3 Statement of Clarification 1/13

- Landscape Institute (2024) Technical Guidance Note LITGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)<sup>101</sup>.

10.31 The following general approach, which is in line with the GLVIA3 guidelines, will be used to assess landscape and visual effects:

- Determine the scope of the assessment (As set in out in **Table 10.1** above for agreement through consultation with the landscape officer at HDC);
- Collate landscape and visual baseline information;
- Describe and review the Proposed Development and the likely impacts associated with it and identify mitigation measures to prevent, reduce or, if possible, offset the likely adverse impacts;
- Assess the sensitivity of the receptors likely to be affected by the Proposed Development by judging value and susceptibility;
- Assess the magnitude of change for these receptors by combining judgements on scale/size of impact, its duration and reversibility;
- Assess the overall effects and determine whether it is significant or not by combining judgements on receptor sensitivity and magnitude of impact.

#### ***Study area***

- 10.32 The study area should be proportional to the scale and nature of the Proposed Development.
- 10.33 For landscape effects, it includes the Site itself and the full extent of the wider landscape around it, which the development may influence in a likely significant manner (directly or indirectly). For visual effects, the study area is typically associated with the extent of the potential visibility of the Proposed Development.
- 10.34 The study area is proposed to cover landscape and visual receptors within approximately 1km of the Site boundary, as there is no potential for any significant changes in landscape character / visual amenity beyond that distance.

#### ***Visual survey***

- 10.35 Detailed field survey of the Site and its context will be carried out in order to review/refine the information collated so far (In January 2026 and previous surveys and as summarised in Technical Baseline, above), identify the key landscape and visual receptors that may be significantly affected by the Proposed Development and attribute value to the landscape receptors.
- 10.36 All views agreed with the LPA and taken in winter 2026 will be retaken in the summer of 2026 to illustrate varying conditions/visibility.

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<sup>101</sup> Landscape Institute (2024) Technical Guidance Note LITGN-2024-01 Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)

- 10.37 Site photographs will be taken using a full frame digital single lens reflex (DSLR) camera with 50mm lens and viewpoint photographs will conform to the Landscape Institute's TGN 6/19 guidance for Type 1 visualisations (Annotated Viewpoint Photograph)<sup>102</sup>.

***Assessment of landscape effects***

- 10.38 Sensitivity of landscape receptors will be assessed by combining judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape. Although landscape has some intrinsic sensitivity, different landscape receptors have different elements and features that can accommodate a variety of development types. Therefore, in LVIA, sensitivity is specific to the particular project or development that is being proposed and to the location in question.
- 10.39 Detailed criteria for the assessment of susceptibility and value of landscape receptors are provided in **Appendix 10.2**.

***Assessment of visual effects***

- 10.40 Visual receptors are individuals and/or defined groups of people who have the potential to be affected by a proposal. The assessment of visual effects will take account of the sensitivity of visual receptors to change in the landscape or townscape caused by the proposed development type.
- 10.41 The extent and nature of visualisations to support the assessment will be agreed through further consultation with HDC.
- 10.42 Sensitivity of visual receptors is a function of the value attached to views and the susceptibility of visual receptors (people) to changes in views.
- 10.43 Detailed criteria for the assessment of susceptibility and value of visual receptors are provided in **Appendix 10.2**.

***Assessment scenarios***

- 10.44 For the purpose of this project, the LVIA will assess effects during the construction and operational stages of the Proposed Development.
- 10.45 All soft landscape proposals are Secondary Mitigation which is taken account of in the assessment of Residual Effects. Assessment of Residual Effects assumes that all proposed landscape mitigation has established and begun to mature (approximately Year 15 of the operational stage).
- 10.46 The effects before the implementation measures, therefore, reflect 'Year 1' scenario (proposed vegetation has not established or matured yet), and the assessment of Residual Effects (after the implementation of mitigation measures) reflects the 'Year 15' scenario.

***Assessment of significant effects***

- 10.1 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine

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<sup>102</sup> Landscape Institute (2013) Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals

the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment. Landscape and visual effects can be beneficial, adverse or neutral (when no change arises).

### **Limitations and Assumptions**

10.2 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- Year 1 effects will take into account the Proposed Development with no secondary mitigation such as planting.
- Year 15 effects (the residual effects) assumes that all proposed soft landscape mitigation has established and begun to mature (reflecting vegetation growth at Year 15).
- The assessment of landscape and visual effects will be based on a series of parameter plans and the information on the Proposed Development contained within the development specification within the ES.

## 11. Archaeology and Built Heritage

- 11.1 This Chapter sets out the proposed scope of assessment of the likely significant environmental effects of the Proposed Development on built heritage and archaeology (identified in planning policy as Heritage Assets<sup>103</sup> forming components of the historic environment<sup>104</sup>).

### Technical Baseline

- 11.2 This EIA Scoping Report has been informed by the findings of an initial assessment based on the following sources of information:
- The National Heritage List for England (NHLE) for information on designated heritage assets<sup>105</sup>;
  - West Sussex Historic Environment Record (HER) for information on known archaeological sites, monuments, findspots and previous archaeological events within the vicinity of the Site;
  - HDC for details of local designations such as conservation areas and locally listed buildings;
  - Online sources for historic maps and documents; and
  - Site visit.
- 11.3 The 'Baseline Methodology and Study Area' section below details the approach for establishing an appropriate study area for the baseline data gathering and the assessment.

### Designated Heritage Assets

- 11.4 There are no designated heritage assets within the Site.
- 11.5 Within 1km of the Site there are 58 listed buildings (one Grade I, two Grade II\* and 55 Grade II) and one conservation area (Billingshurst Conservation Area; see **Figure 11.1**). There are no other designated heritage assets within 1km of the Site.

### Listed buildings

- 11.6 Many of the listed buildings within 1km of the Site are located within Billingshurst Conservation Area, including the Grade I listed Parish Church of St Mary (1354139) and

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<sup>103</sup> A heritage asset is defined in Annex 2: Glossary of the NPPF as, "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."

<sup>104</sup> Defined in Annex 2: Glossary of the NPPF as "All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora."

<sup>105</sup> Defined in Annex 2: Glossary of the NPPF as "A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation."

Grade II\* listed Ye Old Six Bells Inn (1027137). The heritage significance of the listed buildings is typically drawn from their architectural and historic interests, inherent in surviving historic building fabric and as good representative examples of their building type and date.

- 11.7 Those listed buildings within closest proximity to the Site are focused to the south, along the A272 and Lordings Road, and which are all Grade II listed. These include Hole Cottage (1027101), the Lime Burners Arms Public House (1356651) and Diggles (1354125), which all lie within a few metres of the Site boundary; New Bridge (1227432), approximately 20m west of the Site boundary; Newbridge Cottage (1192793), approximately 40m west of the Site; and Newbridge Farmhouse (1027102), approximately 70m west of the Site. All of these assets, except New Bridge (1227432), are dwellings typically with well-defined gardens with varying perceptibility of the wider rural landscape, within which the Site lies, in close proximity to the assets.
- 11.8 The Grade II listed Wynstrode Farmhouse (1286440) lies approximately 250m north of the Site. Whilst the asset appears to be well-enclosed by planting, views of the wider landscape to the south, which includes the Site, may be possible. The existing agricultural character of this landscape makes a limited contribution to the asset's significance, through its historical association with its function as a farmstead.
- 11.9 The Grade II listed Summers Place (1261218) is a 19<sup>th</sup> century country house, which lies approximately 240m to the north-east of the Site. The house is set within landscaped gardens which historically formed part of its wider designed parkland, as evidenced on historic OS mapping. This part of its setting makes an important contribution to its significance, providing a context in which the asset's architectural and historic interests can be appreciated and understood. The layout of the house and gardens appears to have been designed to enable passing views of the house from the west on Stane Street, from which the house is accessed along a tree-lined trackway. In turn, the house faces west, taking in views across the grounds toward the road and possibly the wider landscape beyond. Where more distant views of this wider rural landscape are possible, this is likely to be limited to only the upper floors of the house due to the topography and intervening planting.
- 11.10 The gardens at Summers Place (1261218) encompass another Grade II listed building, which is the Garden Building at Summers Place (1026849). This is set within a wooded area of the gardens, 140m south of the principal house, which has seen subsequent development with modern buildings in use as commercial businesses. As such, the wider landscape, beyond the immediate gardens and the relationship with the principal house, is unlikely to contribute to the significance of the listed garden building (1026849).
- 11.11 The heritage significance of listed buildings which fall within the Billingshurst Conservation Area is also predominantly defined by the architectural and historic interests held within their fabric by being good representative examples of their type and date. The setting of each of these assets is generally characterised by their garden and/or adjacent roadside, and more widely, their proximity and relationship with other buildings and structures within the general urban development of Billingshurst. The wider agricultural landscape beyond (including the Site), which is physically and visually

separated from these assets by modern built infrastructure and planting, is unlikely to make any contribution to the significance of these listed buildings in the core of Billingshurst.

- 11.12 Elsewhere, the listed buildings within 1km are relatively spread out and typically represent isolated farmsteads or residential dwellings positioned within small hamlets and wider modern suburbs of Billingshurst. The immediate setting of these assets is generally defined by a garden, roadside or farmstead, sometimes with associated outbuildings, which will contribute to their significance to varying degrees by allowing an appreciation of architectural interests and contributing to an understanding of the historical function and development of each asset.

### **Conservation Area**

- 11.13 Billingshurst Conservation Area is focused on the historic core of Billingshurst, where linear settlement developed along Stane Street and East Street. Surrounding the conservation area is the modern development of Billingshurst, encircled to the north and east by A roads. A boundary review for the conservation area detailed in the 2018 Billingshurst Conservation Area Appraisal and Management Plan produced by HDC states that *“As a result of modern suburbanisation of Billingshurst’s outskirts, the village has lost the vast majority of its historic agricultural setting. Where fragments of this historic setting survive, at the eastern limits of the built-up area north of East Street, it has been brought into the Conservation Area boundary to preserve Billingshurst’s historic setting”*<sup>106</sup>. The Appraisal identifies a ‘landscape fringe’ with ‘medium’ sensitivity to change to the north-west of the conservation area boundary. This is primarily focused on A272 road and the undeveloped open space on the south-east side of the road but appears to include the wooded boundary either side of the road itself, including where this forms the south-east boundary of the Site. The Appraisal identifies this area as contributing to the rural character of the village. The existing boundary planting along the A272 screens the wider landscape to the north-west in views from the conservation area, as confirmed by the Site visit, and the Conservation Area Appraisal does not identify the Site as a Key Open Space, nor are any Key Views identified across or from any part of the Site. An ‘important link’ identified on Map 6 of the Appraisal, crosses the A272 and extends into a wooded area on the north side of the road, which falls within the Site. The route follows an existing public right of way but there is no further detail provided in the Appraisal as to what makes this an ‘important link’.

### **Non-designated Heritage Assets**

- 11.14 Within the south of the Site, the West Sussex HER identifies the site of Yard East of Newbridge Farm (MWS14162), a former outfarm identified on 19<sup>th</sup> century historic OS mapping (see **Figure 11.2**). No extant structures survive but there is potential for below-ground remains of the former outbuilding to be present, such as demolition material and building foundations. Such remains, if present, would be considered to have no more than low heritage significance.

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<sup>106</sup> Horsham District Council (2018) Billingshurst Conservation Area Appraisal and Management Plan. Available at: [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0006/63087/Billingshurst-Appraisal-and-Management-plan.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0006/63087/Billingshurst-Appraisal-and-Management-plan.pdf) [Accessed: 21 November 2025].

- 11.15 Archaeological work associated with the construction of Billingshurst Bypass recorded a late prehistoric (Bronze Age to Iron Age) deposit and possible hearth (MWS7202) and two undated intercutting pits (MWS7203) within the south-east of the Site, and post-medieval drains and finds (MWS7204) in the north-east of the Site. Archaeological investigations associated with the construction of mixed-use development at Newbridge Road (MWS15043), which narrowly overlaps the Site, identified an undated pit and recut ditch likely to represent a land boundary evident on 19<sup>th</sup> century mapping. If similar remains are present within the Site, these are predicted to be of low heritage significance, or medium heritage significance at most in the case of prehistoric archaeological remains.
- 11.16 No other previous archaeological investigations are recorded within the Site boundary on the HER, therefore the potential for archaeological remains to be present is uncertain. However, archaeological investigations within 1km of the Site, have recorded evidence relating to human activity within and around Billingshurst from the prehistoric onwards. Evidence for early prehistoric activity is generally in the form of findspots of worked flint but also include a Mesolithic working site (MWS3818) and Bronze Age and Iron Age features (MWS15408, MWS10034) (see **Figure 11.2**). Late Iron Age and Roman settlement activity has also been recorded (MWS10034, MWS15408, MWS3698, MWS8225) in the form of cut features (e.g. pits and ditches), deposits and finds. The Roman Road, Stane Street (MWS4281), runs through Billingshurst and the projected alignment lies along the north-west part of the Site boundary. Recorded archaeological remains of medieval and post-medieval date primarily relate to agricultural activity. Historic mapping indicates that the Site was undeveloped agricultural land throughout the 19<sup>th</sup> and 20<sup>th</sup> centuries.
- 11.17 The available evidence indicates that there is some potential for as yet unknown archaeological remains of all periods to be present within the Site. If present, this would likely relate to agricultural activity from the prehistoric, Roman and/or medieval periods, which is unlikely to be of more than low archaeological interest. There is also potential within the Site for Late Iron Age and Romano-British settlement activity, which, if similar in character to that identified on adjacent land, is likely to be of low archaeological interest, or medium at most.

### **Proposed Scope of Assessment**

- 11.18 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

### **Effects Unlikely/Not Significant**

- 11.19 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

***Direct impact or change to designated heritage assets***

- 11.20 There are no designated heritage assets located within the Site, therefore there is no predicted pathway to direct impacts or change to the physical fabric of any designated heritage assets, through either the construction or operation stages of the Proposed Development. Effects arising through direct impacts to designated heritage assets will therefore not occur and will not be considered further in the EIA or reported in the ES.

***Direct impact or change to heritage assets outside of the Site boundary***

- 11.21 No direct disturbance, damage or alteration will arise to heritage assets outside the Site boundary, therefore this will not be considered further in the EIA or reported in the ES.

***Direct impact or change to heritage assets during the operational stage***

- 11.22 Any disturbance of heritage assets within the Site boundary will occur during the construction stage of the Proposed Development. No further effects are anticipated during the operation of the Proposed Development and therefore this will not be considered further in the EIA or reported in the ES.

***Change to setting of heritage assets during the construction stage***

- 11.23 Where effects may arise through change to setting during the construction stage, these would be temporary and limited to the duration of the construction stage and would therefore not give rise to significance effects. As such, this will not be considered further in the EIA or reported in the ES.

***Change to setting of the Grade II Listed New Bridge (1227432) approximately 15m west of the Site boundary***

- 11.24 This asset is a road bridge over the River Arun dating from 1839, with some surviving architectural elements below from an earlier bridge structure. The contribution of setting to this asset's significance is principally derived from its position over the river, which reflects its historic and continued function as a crossing point over a narrow section of river. The bridge is relatively low-lying and not a visually prominent feature within the landscape, and existing trees and vegetation restrict experiences of the bridge from the wider landscape and also limit outward views to the river and road. Its slightly elevated position in relation to surrounding fields to the north-west, affords long views across agricultural land in that direction (which includes the Site), which would be experienced by passing traffic over the bridge. Such views are incidental, and perceptibility of the wider rural landscape is considered to make no notable contribution to the bridge's heritage interest. In any event, the Proposed Development does not propose new buildings within the parts of the Site in closest proximity to the bridge as defined by the Built Development Areas in **Figure 1.1**. In this context, any change to the wider setting of this listed building resulting from the construction or operation of the Proposed Development is not expected to notably affect the significance of this asset.
- 11.25 Therefore, any effects arising through change to the setting of the Grade II listed New Bridge (1227432) are not predicted to be significant and will not be considered further in the EIA or reported in the ES.

***Effects arising through change to setting of the Grade II Listed Summers Place (1261218) located 240m to the north-east of the Site***

- 11.26 The Proposed Development is unlikely to be perceptible from this listed building due to existing, intervening planting and topography in combination with the distance of at least 240m. Where an experience of the Proposed Development may be possible, this would likely be from the upper floors of the house only, and as part of the horizon over the top of existing tall intervening woodland. The key facets of the setting of the asset, which contribute to its significance, i.e. its associated landscaped grounds and immediately surrounding agricultural land will be unaffected by the Proposed Development.
- 11.27 Given a 'worst case' scenario that built form were to be introduced into parts of the Site closest to the listed building and might be visible from or in combination with the listed building, this is still not expected to affect any element of the asset's setting that contributes to its significance. In this context there is considered to be no potential for the construction or operation of the Proposed Development to result in change to the wider setting of this listed building that would notably affect its heritage significance. On this basis, there is considered to be no potential for significant effects on this listed building, and it will not be considered further in the EIA or reported in the ES.

***Effects arising through change to setting of other listed buildings not listed in Table 11.1.***

- 11.28 Due to the existing topography of the Site and surrounding landscape, together with existing built infrastructure and planting, it is considered that the construction and operation stages of the Proposed Development have no potential to notably affect the heritage significance of the listed buildings located in the town of Billingshurst between c. 150m and c.1km to the south-east; in Newpound, c.775m to the north-west; off Rowner Road c.400m to the north; and other isolated listed buildings at Coppen Hall 870m to the north-west and those scattered within the rural landscape between c.480m and c.1km to the south. Accordingly, these 48 No. listed buildings will not be considered further in the EIA or reported in the ES.

***Effects arising through change to setting of Billingshurst Conservation Area***

- 11.29 Due to intervening built infrastructure, topography and planting, there is no intervisibility between the Site and the conservation area and the Site therefore does not form part of the surroundings in which the conservation area is experienced nor make any contribution to its character or appearance. While the HDC Conservation Area Appraisal identifies locations within the wider landscape beyond the designated area that make a positive contribution to its significance, with reference to Key Views and Key Open Space, no part of the Site is identified in this regard.
- 11.30 In the context that the Proposed Development would be separated from the conservation area by intervening modern development surrounding the designated area, there is considered to be no potential for any notable change to the asset's setting or significance through the construction or operation of the Proposed Development. Accordingly, the Billingshurst Conservation Area will not be considered further in the EIA or reported in the ES.

### Effects Likely/Significant

- 11.31 **Table 11.1** outlines the effects (and associated receptor[s]) that are considered likely and significant and therefore will be assessed within the EIA and reported in the ES. In respect of the listed buildings that have been scoped into the assessment, this is on the basis that these assets are located in close proximity to the Site (such as the group at New Bridge to the south) or where their settings appear to coincide with the Site, such that, in the absence of a detailed assessment of their heritage significance and setting at this stage, there is currently uncertainty as to the level of effect that each asset might receive.

**Table 11.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                                                                                               | Receptor(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicable Stage(s) |
|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| Impact on heritage significance arising through change to setting                                    | <p>Grade II listed Hole Cottage (1027101), within a few metres of the Site boundary.</p> <p>Grade II listed Newbridge Farmhouse (1027102), c.80m southeast of the Site.</p> <p>Grade II listed Newbridge Cottage (1192793), c.40m west of the Site.</p> <p>Grade II listed Diggles (1354125), within a few metres of the Site boundary.</p> <p>Grade II listed The Lime Burners Arms Public House (1356651), within a few metres of the Site boundary.</p> <p>Grade II listed Wynstrode Farmhouse (1286440), c.250m north of the Site.</p> | Operation           |
| Impact on heritage significance arising through direct disturbance to non-designated heritage assets | Archaeological remains within the Site boundary.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Construction        |

### Assessment Methodology of Effects Likely/Significant

- 11.32 The following background surveys/studies will be completed.

**Table 11.2: Background Surveys/Studies**

| Survey/Study/Analysis / Evaluation | Overview | Date of Completion |
|------------------------------------|----------|--------------------|
| Pending                            |          |                    |

| Survey/Study/Analysis / Evaluation             | Overview                                                                                                                                         | Date of Completion |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| Archaeology and heritage desk-based assessment | To provide a detailed historic environment baseline for the Site and relevant heritage assets to inform the ES assessment.                       | Q1 2026            |
| Geophysical survey                             | To inform an understanding of the archaeological potential and significance of any remains within the Site, which will inform the ES assessment. | Q1 2026            |

### **Baseline Methodology and Study Area**

- 11.33 No previous archaeological or built heritage assessments are recorded for the Site area.
- 11.34 Baseline Archaeology and Heritage Assessments for the Site will be undertaken to evaluate the known and potential archaeological and historic resource within the Site and a wider study area, to assess significance and to make appropriate recommendations for the future treatment of any assets which may be affected. The baseline data collection will also extend to an appropriate assessment of the setting of relevant heritage assets and any necessary archaeological field evaluation, to be determined through consultation with the HDC Archaeological Officer in their role as advisors to HDC.
- 11.35 In addition to site visits, consultation with the following organisations and sources will be undertaken:
- West Sussex Historic Environment Record;
  - Archaeological Advisor to Horsham District Council;
  - Local archives and other relevant repositories;
  - The National Heritage List for England curated by Historic England;
  - Local heritage lists and local designations;
  - Relevant Historic England Guidance;
  - Historic mapping;
  - Historic aerial photography held by Historic England;
  - Archaeological Data Service Online Catalogue; and
  - Previous desk-based assessments, EIAs or fieldwork reports for other sites within the vicinity.

- 11.36 A Site visit to inform this EIA Scoping Report (including a walkover of the Site itself and visits to surrounding heritage assets), in combination with initial desk-based assessment and the results of Zone of Theoretical Visibility (ZTV) modelling, indicates that visual change through development of the Site is predicted to be geographically limited to a radius of approximately 1km from the Site boundary. Therefore, in line with Historic England guidance<sup>107</sup>, a study area of 1km radius measured from the boundaries of the Site, as set out in the accompanying plan (**Figure 11.1**), is considered appropriate to assess the potential for indirect impacts on heritage assets in the wider landscape through changes to their settings.
- 11.37 Nonetheless, the assessment will take into account the understanding that the ability to see the Proposed Development from or in combination with a heritage asset does not necessarily equate to an effect upon that heritage asset. It is a question of whether such intervisibility affects the asset's heritage significance. A holistic approach to the setting of heritage assets will therefore be employed, in line with best practice, which considers aspects beyond visual matters to determine the baseline circumstances and subsequently the potential effects of the Proposed Development.
- 11.38 At the same time, a 1km study area from the boundary of the Site is also considered appropriate to inform an understanding of the baseline position in terms of the Site's archaeological potential, in combination with the results of any archaeological investigations within the site itself that may be required following consultation with the HDC.
- 11.39 Following the completion of the baseline studies, the identified heritage assets will be placed in their local, regional and national context, and assessed against national criteria in line with the ES methodology set out below.

#### **Assessment Methodology**

- 11.40 Heritage assets within the 1km study area have been subject to an initial appraisal to determine those with the potential to experience significant environmental effects.
- 11.41 In the absence of a specific prescribed criteria for assessment on the impacts on built heritage and archaeological receptors, the methodology for establishing the relative value or importance of heritage assets (sensitivity), the magnitude of impact and the level and significance of effect will be in line with the guidance set out in:
- National Planning Policy Framework (NPPF) Section 16: Conserving and enhancing the historic environment<sup>108</sup>;

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<sup>107</sup> Historic England (2017) *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

<sup>108</sup> Ministry of Housing, Communities and Local Government (2012) Section 16: Conserving and enhancing the historic environment, *National Planning Policy Framework (NPPF)* <https://www.gov.uk/guidance/national-planning-policy-framework/16-conserving-and-enhancing-the-historic-environment> [Accessed 08/12/2025]

- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets: Historic England Guidance, published 2017<sup>109</sup>;
- The Design Manual for Roads and Bridges Volume 11, Section 3, Part 2 (LA104: Environmental assessment and monitoring) published by the Highways Agency in 2020<sup>110</sup>;
- Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment: Historic England Guidance, published 2015<sup>111</sup>; and
- Principles of Cultural Heritage Impact Assessment in the UK, published 2021<sup>112</sup>.

11.42 These documents do not provide a prescriptive approach to assessment but identify principles and good practice that will be applied in the methodology for the assessment.

11.43 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (heritage significance) (on a scale of high, medium, low and negligible) (see Table 11.3) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Magnitude of change is a measure of the extent to which the heritage significance of an asset will be affected (see Table 11.4). The assessment may identify no change to the significance of a receptor, which would lead to no effect. Significant effects will be determined following this through professional judgment, informed by an understanding of the heritage significance (sensitivity to change) of these assets and having regard to the guidance listed above.

**Table 11.3: Sensitivity of receptor**

| Receptor            | Sensitivity of Receptor |      |        |     |            |
|---------------------|-------------------------|------|--------|-----|------------|
|                     | Very High               | High | Medium | Low | Negligible |
| World Heritage Site |                         |      |        |     |            |
| Scheduled Monument  |                         |      |        |     |            |

<sup>109</sup> Historic England (2017). *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*. <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> [Accessed 08/12/2025]

<sup>110</sup> Highways Agency (2020). LA 104 - Environmental assessment and monitoring, *Design Manual for Roads and Bridges* <https://www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a> [Accessed 08/12/2025]

<sup>111</sup> Historic England (2015). *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*. <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/> [Accessed 08/12/2025]

<sup>112</sup> IEMA/ISEP, IHBC & ClfA (2021). *Principles of Cultural Heritage Impact Assessment in the UK*.

| Receptor                                                     | Sensitivity of Receptor |  |  |  |  |
|--------------------------------------------------------------|-------------------------|--|--|--|--|
| Grade I or II* Listed Building                               |                         |  |  |  |  |
| Grade I or II* Registered Park or Garden                     |                         |  |  |  |  |
| Other nationally important archaeological asset              |                         |  |  |  |  |
| Grade II Listed Building                                     |                         |  |  |  |  |
| Grade II Registered Park or Garden                           |                         |  |  |  |  |
| Conservation Area                                            |                         |  |  |  |  |
| Other asset of regional or county importance                 |                         |  |  |  |  |
| Locally important asset with cultural or educational value   |                         |  |  |  |  |
| Heritage site or feature with very limited value or interest |                         |  |  |  |  |

**Table 11.4: Magnitude of change criteria**

| Magnitude of Change | Description                                                                                   |
|---------------------|-----------------------------------------------------------------------------------------------|
| <b>Large</b>        | Change to the significance of a heritage asset so that it is completely altered or destroyed. |
| <b>Medium</b>       | Change to the significance of a heritage asset so that it is significantly modified.          |
| <b>Small</b>        | Change to the significance of a heritage asset so that it is noticeably different.            |
| <b>Negligible</b>   | Change to the significance of a heritage asset that hardly affects it.                        |

- 11.44 Effects will be categorised with regard to their nature (adverse, beneficial or neutral) and their permanence (permanent, temporary or reversible). For all forms of heritage asset (receptor); including archaeological sites and remains; historic buildings, places and areas; and historic landscapes.
- 11.45 A Heritage Assessment will accompany the ES and include an assessment of the heritage significance and setting of those heritage assets within the study area (i.e. 1km) that are likely to be affected by the Proposed Development as identified on **Figure 11.1**. Only those assets which are likely to experience significant effects will be carried forward for assessment within the ES chapter. Where appropriate, the assessment will be undertaken with reference to any relevant modelling and visualisations, with respect to heritage assets.

### **Limitations and Assumptions**

- 11.46 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:
- Development will not occur outside of the Site boundary identified in **Figure 11.1** that demarcates the maximum extent of all permanent and temporary works associated with the Proposed Development. As a worst case, for the purpose of EIA Scoping Report it has been assumed that direct ground disturbance may occur anywhere within this Site Boundary.

## 12. Water Environment

### Technical Baseline

#### Surface Water Features

- 12.1 The River Arun is located 400m from the western edge of the Site, flowing in a southerly direction and eventually discharging into the English Channel at Littlehampton Harbour.
- 12.2 Ordinary Watercourses and Drains serving the agricultural land are present across the Site and convey surface water to the west of the Site and into the River Arun. All of the overland flows across the Site will discharge into the River Arun.
- 12.3 Located to the south of the Site are two Ordinary Watercourses, Par Brook and Brockhurst Brook, which combine prior to discharging directly into the River Arun. The onsite ordinary watercourses do not flow into these off-site watercourses. The Billingshurst Foul Water Treatment Works (WwTW), located approximately 1km to the south of the Site, discharges into the Par Brook, located immediately south of the WwTW.

#### Geology and Hydrogeology

- 12.4 British Geological Survey (BGS) data<sup>113</sup> confirms the Site is underlain by both Weald Clay formation – Mudstone, and Weald Clay formation – Sandstone. These bedrock geologies are both impermeable strata of clay and cover the Site in alternating bands from north to south. There are no known superficial deposits on the Site. Further details are provided in '*Ground Conditions and Contamination*' (**Chapter 5**).

#### Flood Risk

- 12.5 The levels across the Site are split into two distinct areas. The levels in the northern part of the Site (to the north east of the recycling centre) fall from a high point of 52.58m above ordnance datum (AoD) in the north east of the Site to a low point of 22.77m AoD along the boundary of the recycling centre, in the centre of the Site. This gives a general fall of 1:47 across this northern part of the Site.
- 12.6 Levels to the south of the recycling centre fall from a high point of 25.22m AoD near the recycling centre, to a low point of 8.22m AoD along the western boundary of the Site. This gives a general fall of c1:55 across this part of the Site.
- 12.7 Levels generally fall from east to west at a gradient of c1:50. This aligns with the watercourse layout evident on surveys with surface water falling from east to west to the River Arun.
- 12.8 The EA's Flood Map shows the majority of the Site to be within Flood Zone 1. There are small areas of Flood Zone 2 and 3 close to the River Arun and along existing watercourses located within the Site. The extents of these designated Flood Zones can

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<sup>113</sup> British Geological Society Mapping. Available at <https://www.bgs.ac.uk/map-viewers/bgs-geology-viewer/> (accessed on 20<sup>th</sup> November 2025)

be found in **Figure 12.1**. The extent of Flood Zone 2 is considered to be on the Arun's flood plain.

- 12.9 Areas of surface water flood risk are shown by the EA mapping<sup>114</sup> and on **Figures 12.2-12.5** within the boundaries of the Site, however these are mainly associated with existing Ordinary Watercourses.
- 12.10 There are no areas of the Site considered to be at risk from reservoir flooding as shown in **Figure 12.7**.
- 12.11 A review of DEFRA's online Magic Mapping<sup>115</sup> shows the Site is underlain by both Unproductive Strata and instances of High Groundwater Flood Risk, therefore, flood risk from groundwater is considered to be high as shown in **Figure 12.6**. Groundwater levels at the Site are defined in '*Ground Conditions and Contamination*' (**Chapter 5**).

#### **Existing Drainage Regime**

- 12.12 Due to the greenfield nature of the Site, it is unlikely that there are existing positive drainage assets, such as gullies and manholes, within the Site boundary. There are currently no known drainage utility records available for the Site, but it is assumed the only drainage present is associated with the Site's existing agricultural use.
- 12.13 No infrastructure for Billingshurst WwTW is located within the Site boundary.

#### **Water Quality**

- 12.14 The Site is located within a Water Framework Directive (WFD) surface body catchment, Arun U/S Pallingham catchment. This has an ecological WFD classification of moderate.
- 12.15 A Water Framework assessment is not proposed to be carried out for this Site due to the WFD classification of moderate. As part of the drainage strategy, a Simple Index Approach assessment will be carried out to ensure the runoff from the proposed drainage system is clean.

#### **Proposed Scope of Assessment**

- 12.16 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

#### **Effects Unlikely/Not Significant**

- 12.17 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this

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<sup>114</sup> EA Flood Risk Mapping. Available at <https://flood-map-for-planning.service.gov.uk/> (accessed on 20<sup>th</sup> November 2025)

<sup>115</sup> DEFRA Magic Mapping. Available at <https://magic.defra.gov.uk/> (accessed on 20<sup>th</sup> November 2025)

judgement, the identified mitigation has been captured within the PEMP provided in **Appendix 2.1**.

***Decrease in water quality as a result of runoff during construction activities***

12.18 Construction activities have the potential to result in silt deposition, chemical runoff and/or cement pollution arising from runoff from on-Site construction activities, resulting in the decrease in water quality of receiving water bodies for both surface and groundwater. It is anticipated that runoff produced during construction activities will be controlled through the implementation of a Construction Environmental Management Plan (CEMP). The CEMP will include prevention measures and set out requirements for ongoing monitoring in line with Environment Agency PP6 and PP8. These tertiary mitigation measures form part of the PEMP (**Appendix 2.1**). Some of these could include:

- Stockpiling of soil and materials to be sheltered and as far from residential properties, water bodies, streams, trees, and woodlands.
- Construction of temporary attenuation ponds which would be designed to collect and attenuate surface water, to mitigate the risk of flooding. The ponds would also allow sediment from the construction to settle and improve water quality.
- In line with PPG 6 requirements, all plant, wheel and boot washing facilities in an area of hardstanding to be a minimum of 10m from a watercourse.
- In accordance with PPG 6, a bunded storage area will be located on the Site for storage of oils, fuels, chemicals, and other hazardous construction materials.
- Plant and equipment to be stored on dedicated hard standing.
- Refuelling to be undertaken in impermeable areas, away from drains and watercourses with spill kits available in the event of an accident.

12.19 Therefore, a decrease in water quality as a result of runoff during construction activities to waterbodies within and downstream of the Site are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Increase in flood risk on- and off-Site as a result of runoff during construction activities***

12.20 An increase in areas of hardstanding, the compaction of ground and changes in topography across the Site as a result of construction activities have the potential to result in increased flood risk both on- and off-Site. This has the potential to arise from increased volumes of runoff, resulting in a risk to infrastructure classified as 'more vulnerable' (e.g. residential development off Rowner Road, central to the Site) and areas classified as 'less vulnerable' (e.g. the Billingshurst Recycling Centre and sports ground). It is anticipated that runoff produced during construction would be managed through the implementation of a CEMP. The CEMP will include measures such as the installation of a temporary surface water drainage system to manage and direct runoff during construction. These tertiary mitigation measures form part of the PEMP (**Appendix 2.1**).

- 12.21 Therefore, an increase in flood risk on- and off-Site as a result of runoff during construction activities is not considered to be significant. This will not be considered further in the EIA or reported in the ES.

***Increase in surface water flood risk as a result of increased overland flows from changes to topography and increased areas of hardstanding during operation***

- 12.22 An increase in areas of hardstanding and changes in topography across the Site as a result of the operation stage have the potential to increase surface water flood risk both on and off the Site. This has the potential to arise from increased volumes of runoff resulting in a risk to infrastructure classified and 'more vulnerable' (e.g. residential development on the Site). It is anticipated that runoff produced during the operational stage will be managed through the design of a new surface water design system which will include the implementation of SuDS. The new surface water design will manage and direct runoff to suitable discharge points, and include areas of attenuation to store excess flows during times of heightened rainfall. These mitigation measures will form the surface water design. The surface water strategy will look to incorporate site appropriate SuDS to match the existing flow of surface water, so far as is possible. If required, multiple discharge locations will be used to ensure the receiving water bodies are not disproportionately affected by change in flows during the operational stage of the Site. An allowance of 45% will be added to the 1 in 30 year, and 1 in 100 year storms.
- 12.23 The surface water drainage strategy will be developed to utilise relevant design guidance and code, in accordance with the requirements of the West Sussex Local Flood Risk Management Strategy<sup>116</sup>, CIRIA SuDS Design guidance, the DEFRA Sustainable Drainage Systems Non-statutory technical standards, Design and Construction guidance (Codes for Adoption), Building Regulations Part H<sup>117</sup> and any requirements from the local adopting sewerage authority (Southern Water). It is anticipated that surface water will be managed using a Sustainable Drainage System (SuDS) management train before discharging into the existing on-site watercourses at a greenfield discharge rate.
- 12.24 Therefore, an increase in flood risk on and offsite as a result of runoff during operation is not considered to be significant. This will not be considered further in the EIA or reported in the ES.

***Risk of flooding from fluvial sources on future Site users***

- 12.25 There are existing areas of fluvial flood risk across the Site which are highlighted as the Flood Zones within the EA mapping<sup>118</sup> as shown in **Figure 12.1**. If properties were

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<sup>116</sup> West Sussex Local Flood Risk Management Strategy (2025-2030) (July 2025).

<sup>117</sup> The SuDS Manual (C753F) CIRIA [https://www.ciria.org/CIRIA/CIRIA/Item\\_Detail.aspx?iProductCode=C753](https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C753)  
DEFRA National Standards for Sustainable Drainage Systems (SuDS)  
<https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds> Sewer Sector Guidance, Version 2.2  
<https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds> Drainage and Waste Disposal: Approved Document H; 2015 Edition [https://assets.publishing.service.gov.uk/media/5a80cf9ded915d74e33fc8ae/BR\\_PDF\\_AD\\_H\\_2015.pdf](https://assets.publishing.service.gov.uk/media/5a80cf9ded915d74e33fc8ae/BR_PDF_AD_H_2015.pdf)

<sup>118</sup> EA Flood Risk Mapping. Available at <https://flood-map-for-planning.service.gov.uk/> (accessed on 20<sup>th</sup> November 2025)

placed in these locations, a risk would arise to the infrastructure classified as 'more vulnerable' (e.g. residential properties on the Site).

- 12.26 The Proposed Development will be developed to ensure all infrastructure classified as 'more vulnerable' will be located outside of areas highlighted as being in a Flood Zone 2 or 3 as defined on the EA flood maps<sup>119</sup>.
- 12.27 Therefore, the effect of flood risk on future Site users during the operational stage is not considered to be significant. This will not be considered further in the EIA or reported in the ES.

***Increase in flood risk from groundwater during operation***

- 12.28 A change in levels and increase in areas of hardstanding as a result of the operation stage could increase the risk of groundwater flooding on the Site resulting in a risk to infrastructure classified as 'more vulnerable' (e.g. residential development on the Site). It is anticipated that the impact to groundwater levels will be managed through the implementation of a new surface water design system that will include the implementation of SuDS and suitable building techniques. The surface water system will discharge into the river which mirrors the existing situation experienced on the Site. The levels across the Site will also be managed to ensure changes in level are managed appropriately and minimised where possible to lower the impact on groundwater. New ditches will be introduced across the Site as necessary to assist in moving groundwater that has broken the surface, whilst the maintenance of existing ditches will be increased as part of their management and maintenance schemes.
- 12.29 Therefore, increase in flood risk from groundwater during the operational stage is not considered to be significant. This will not be considered further in the EIA or reported in the ES.

***Increased demand on existing drainage networks and Wastewater Treatment Works***

- 12.30 The Proposed Development will lead to a notable increase in demand on existing foul water drainage networks and the nearby Wastewater Treatment Works as a result of the operational stage that has the potential to put the existing infrastructure at risk of flooding. This has the potential to arise from increased foul water flows being produced by the Proposed Development.
- 12.31 At this stage, it is anticipated that the foul sewer will discharge to the Billingshurst WwTW located approximately 1km south of the Site. The discharge method is likely to be pumped from multiple proposed pump stations across the Site, though connection locations and flow rates are to be agreed with Southern Water. The foul strategy will be developed in accordance with Design and construction guidance (Sewer Sector Guidance) and Building regulations Part H. Southern Water have the responsibility to ensure that capacity constraints (and therefore flood risk) is not exacerbated, and the sufficient capacity is available in the network to allow the connection of the Proposed Development. As such, it is the necessary upgrades to existing infrastructure, including the Wastewater Treatment Works, will be undertaken by Southern Water prior to the Proposed Development being operational. Furthermore, a separate Surface Water and

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<sup>119</sup> EA Flood Risk Mapping. Available at <https://flood-map-for-planning.service.gov.uk/> (accessed on 20<sup>th</sup> November 2025)

Foul Drainage Strategy will be submitted as part of the Application detailing how foul water flows will be managed in compliance with local and national policy.

- 12.32 Therefore, an increase in demand on existing foul water drainage networks and Wastewater Treatment Works during the operational period are not considered to be significant. This will not be considered further in the EIA or reported in the ES.

***Increased demand on potable water use during construction and operation***

- 12.33 The construction stage of the Proposed Development will present demands for water supply, including sanitary facilities for construction workers and water supply for wheel washing and washing down of construction areas. The completed Proposed Development will result in demand for potable water due to the needs of future site users. Therefore, there will be increase the demand on potable water supplies.
- 12.34 The local water provider (Southern Water) will be consulted prior to construction to assess the impact of this increase in water supply and ensure that supplies can be met without creating a noticeable effect on residents or at source.
- 12.35 In terms of the environmental effects at a regional level, it is noted that Natural England Water Neutrality Position Statement (2021) was withdrawn in October 2025 and as a result HDC no longer require a water neutrality statement or offsetting contributions as part of planning applications<sup>120</sup>. Furthermore, in line with Water Industry Act 1991<sup>121</sup>, Southern Water are required to prepare a statutory plan every 5 years to determine how they will secure sustainable water supply over the next period accounting for factors such as development and have produced a Water Resource Management Plan (2024)<sup>122</sup>. It is, therefore, the statutory responsibility of Southern Water to ensure sufficient capacity is available along with the delivery of any associated upgrades.
- 12.36 With that said, the Proposed Development will be designed to comply with Building Regulations Part G Optional Technical Standard of 110 litres per person per day (l/p/d) as required by Policy 37 of the Horsham District Planning Framework. Therefore, increased demand for potable water use is unlikely to be significant and will not be considered further in the EIA or reported in the ES.

***Increase in surface water flood risk as a result of realigning watercourses***

- 12.37 The realignment of watercourses as a result of the operational stage has the potential to increase surface water flood risk on the Site. This has the potential to arise from changes in flow rates and locations of watercourses. A single watercourse identified in the north of the Site is likely to require realignment as part of the Proposed Development. This water course runs from the bus stop on Stane Street (east of the Site), directly westwards to the wooded area to the west of the Site. This watercourse currently drains the fields directly either side of it and is a sharp banked in design. The intention is to open up the area around the ditch through a more 'winding' route of the

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<sup>120</sup> <https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district>

<sup>121</sup> Water Industry Act 1991. Available at: <https://www.legislation.gov.uk/ukpga/1991/56/contents>

<sup>122</sup> Water Resource Management Plan (May 2024 Final Draft). Southern Water. Available at: <https://www.southernwater.co.uk/about-us/our-plans/water-resources-management-plan/>

watercourse to provide more ecological benefits to the area. No changes to its flow or capacity are proposed.

- 12.38 The watercourses will be designed to accommodate the necessary flows to not increase flood risk. Approval of these works will also be obtained from the Lead Local Flood Authority who are the overseeing authority for works to Ordinary Watercourses.
- 12.39 Therefore, an increase in surface water flood risk as a result of realigning watercourses during the operational stage are not considered significant. This will not be considered further in the EIA or reported in the ES.

#### Effects Likely/Significant

- 12.40 Table 12.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 12.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                                          | Receptor(s)                                                                                    | Applicable Stage(s) |
|-------------------------------------------------|------------------------------------------------------------------------------------------------|---------------------|
| Decrease in water quality as a result of runoff | All surface watercourses and waterbody receptors such as River Arun.<br>Groundwater receptors. | Operation           |

#### Assessment Methodology of Effects Likely/Significant

- 12.41 The following background surveys/studies have been/will be completed.

**Table 12.2: Background Surveys/Studies**

| Survey/Study/Analysis/Evaluation | Overview                                                                                                                                                                                                                     | Date of Completion |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <b>Completed</b>                 |                                                                                                                                                                                                                              |                    |
| Site Walkover                    | A Site walkover was undertaken for a visual inspection of the watercourses to inform where further surveys may be required.                                                                                                  | November 2025      |
| <b>Pending</b>                   |                                                                                                                                                                                                                              |                    |
| Flood Risk Assessment            | A Flood Risk Assessment will be produced to assess the risk to the Site from flooding. This assessment will include an allowance for climate change and consider the Proposed Development's compliance with relevant policy. | Summer 2026        |

| Survey/Study/Analysis/<br>Evaluation | Overview                                                                                                                                                                                                                           | Date of Completion |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| Drainage Strategy                    | A separate Surface Water and Foul Drainage Strategy for the Proposed Development will be produced detailing how the proposed drainage will manage surface water and foul water flows in compliance with local and national policy. | Summer 2026        |

12.42 Desk based studies will be used to inform all parts of the Site. This is considered to be appropriate and provide the required level of detail to inform the assessment.

12.43 The following guidance will be used to inform the supporting reports listed above and the ES Chapter:

- National Planning Policy Framework (NPPF) (2025)<sup>123</sup>;
- Water Environment (Water Framework Directive) (England and Wales) Regulations 2017<sup>124</sup>;
- Flood and Water Management Act 2010<sup>125</sup>;
- DEFRA Sustainable Drainage Systems Non-Statutory technical standard for sustainable drainage systems 2015<sup>126</sup>;
- Horsham District Council Local Plan Adopted 2015<sup>127</sup>;
- Horsham District Council Strategic Flood Risk Assessment (September 2024)<sup>128</sup>; and
- 2015 CIRIA SuDS Manual (C753F)<sup>129</sup>.

<sup>123</sup> National Planning Policy Framework (NPPF) (2025) <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (accessed 20<sup>th</sup> November 2025)

<sup>124</sup> Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 <https://www.legislation.gov.uk/uksi/2017/407/contents> (accessed 20<sup>th</sup> November 2025)

<sup>125</sup> Flood and Water Management Act 2019 <https://www.legislation.gov.uk/ukpga/2010/29> (accessed 20<sup>th</sup> November 2025)

<sup>126</sup> DEFRA Sustainable Drainage Systems Non-Statutory technical standard for sustainable drainage systems 2015 <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems> (accessed 20<sup>th</sup> November 2025)

<sup>127</sup> Horsham District Council Local Plan Adopted 2015 [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf) (accessed 20<sup>th</sup> November 2025)

<sup>128</sup> Horsham District Council Strategic Flood Risk Assessment (September 2024) <https://www.horsham.gov.uk/planning/planning-policy/evidence-base/strategic-flood-risk-assessment> (accessed 20<sup>th</sup> November 2025)

<sup>129</sup> CIRIA SuDS Manual (C753F) [https://www.ciria.org/CIRIA/Books/Free\\_publications/C753F.aspx](https://www.ciria.org/CIRIA/Books/Free_publications/C753F.aspx) (accessed 20<sup>th</sup> November 2025)

- 12.44 The study area will be defined as the Site with the addition of downstream watercourses and infrastructure receptors adjacent to the Site.
- 12.45 The assessment within the ES will be informed by drainage calculations, the Flood Risk Assessment and Drainage Strategy, as set out above, and based on Parameter Plans and design principles that will be set out within the ES.
- 12.46 Assumptions based on current industry best practice will be used to determine the proposed proportion of hardstanding areas within the Site for the drainage calculations.
- 12.47 The sensitivities of the identified receptors will be determined using professional judgement and will be clearly justified within the ES Chapter.
- 12.48 The FRA for the Planning Application will compare the Proposed Development to HDC documents and national policy (as highlighted in *para 12.42*) to ensure compliance.
- 12.49 Further consultation regarding queries raised by the Environment Agency, Utility Providers, and the Lead Local Flood Authority regarding the Proposed Development and the proposed surface water drainage strategy will be carried out to inform the design.
- 12.50 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

### **Limitations and Assumptions**

- 12.51 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:
- There are no substantial limitations to the data availability for the assessment or the impact assessment. The assessment is a subjective and qualitative assessment based on experience and presented as value judgements; and
  - The water environment and flood risk receptors have been defined using a combination of published data sources, and project-specific assessments. The availability of published data with which to inform this assessment is considered robust and therefore this approach is considered acceptable.
  - There are no substantial limitations to the data availability for the assessment or the impact assessment. The assessment is a subjective and qualitative assessment based on experience and presented as value judgements; and
  - The water environment and flood risk receptors have been defined using a combination of published data sources, and project-specific assessments. The availability of published data with which to inform this assessment is considered robust and therefore this approach is considered acceptable.

## 13. Socio-economics and Human Health

### Technical Baseline

- 13.1 The Site is located within the administrative boundary of HDC, which forms the Local Impact Area for this assessment. The 2021 Census<sup>130</sup> indicates that 58% of people working in HDC also live within the district, suggesting that there is a relatively high level of socio-economic containment within this geography.
- 13.2 The boundary of the former Coast to Capital Local Enterprise Partnership (C2C LEP) forms the wider impact area. Whilst LEP funding was withdrawn in 2024 (with their administrative functions returning to district and county councils), the boundary of the former C2C LEP represents an established socio-economic geography, which remains relevant to the consideration of the Proposed Development. This is demonstrated by the 2021 Census, which reported that 93% of people working within HDC lived within the C2C LEP's boundary, suggesting a notably high level of socio-economic containment in this geography.

### Economic Activity and Employment

- 13.3 The latest Population Estimates<sup>131</sup> indicates that as of 2024, the population of HDC totalled c. 151,521 residents, accounting for c. 9.4% of the C2C LEP's total population of c. 1.6 million. 59% of HDC residents are of working age (aged 16-64), which is lower than across the C2C LEP area (62%) and the national rate (63%).
- 13.4 Over the year to June 2025, the average economic activity rate amongst the working-age resident population of HDC (86%) was higher than in C2C LEP (82%), and in England as a whole (79%). Working-age employment rates were also higher locally (83%) than in the C2C LEP (79%) and in England as a whole (76%).

### Labour Market and Industry

- 13.5 The ONS 2024 Business Register & Employment Survey (BRES)<sup>132</sup> estimated that there were 60,150 workforce jobs in HDC, equating to c. 8.3% of the c. 729,000 jobs in C2C LEP as a whole. HDC supported 4,000 jobs in the construction sector, equating to c. 6.7% of total employment locally, which is higher than the sector's representation in the wider C2C LEP area (5.5%) and nationally (5.0%).
- 13.6 As of September 2025, there were c. 1,770 people claiming out-of-work benefits in HDC principally for the reason of being unemployed<sup>133</sup>, accounting for 2.0% of the resident population aged 16-64, which is lower than the proportions across C2C LEP (3.1%) and England (4.1%).
- 13.7 Analysis of ONS Jobseeker's Allowance (JSA) claimant data<sup>134</sup> – a subset of the overall claimant count presented above – indicates that 25 people were specifically seeking

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<sup>130</sup> ONS via Nomis (2025) Census 2021

<sup>131</sup> ONS via Nomis (2025) Population Estimates- local authority based on five year age band -2024

<sup>132</sup> ONS via Nomis (2025) Business Register and Employment Survey: 2024

<sup>133</sup> ONS Via Nomis (2025) Claimant Count: September 2025

<sup>134</sup> ONS Via Nomis (2025) Jobseeker's Allowance: September 2025

employment in construction-related trades in HDC in September 2025, rising to c. 365 across the C2C LEP area.

### **Education Facilities**

- 13.8 There is one privately-operated nursery in the immediate locality of the Site, Wakoos Centre4Children (located c. 1.1 miles travel distance from the Site). Additional childcare provision is available at Bobtails Montessori Nursery School in Adversane (c. 2.2 miles). Further provision is available in Risborough Green (Climbing Bears Pre-School, 2.5 miles) and in Coneyhurst (Natural Nurture Nursery, 2.9 miles).
- 13.9 There is one primary school in Billingshurst: Billingshurst Primary Academy (located c. 0.9 miles travel distance to the Site), which DfE data<sup>135</sup> suggests currently has 23 available places. Further provision is available at Wisborough Green Primary School (c. 2.7 miles), with c.21 places currently available and Barns Green Primary School (4.3 miles), with c.10 space places.
- 13.10 The closest secondary school to the Site is The Weald School, located in Billingshurst, c. 1.2 miles travel distance to the Site. DfE data<sup>136</sup> suggests that the school currently has 28 available places. Further provision exists in Horsham, at the Tanbridge House School (c. 6.6 miles, and currently operating overcapacity by 24 pupils), the Forest School (c. 8.7 miles), and Millais School (an all-girls school<sup>137</sup>, located 9.6 miles away, with c.445 places available).
- 13.11 There are also a number of Special Educational Needs (SEN) schools within a reasonable travel distance to the Site, the closest being Ingfield Manor School (c.1.9 miles). DfE data<sup>138</sup> suggests that the school currently has 29 available places. Further provision is available at Apple Orchard School (c.2.2 miles), an all-boys school, with c. 11 places available<sup>139</sup>, as well as Muntham House School (3.7 miles), with c. 30 spare places. However, it should be noted that given the bespoke nature of SEND education provision, which is dependent on the individual needs of children, aggregate capacity is not necessarily a reflection of current constraints within SEND schools.

### **Healthcare Facilities**

- 13.12 The NHS 'Find a GP' online search tool<sup>140</sup> identifies that the closest GP surgery to the Site is Billingshurst Surgery (c. 0.9 miles travel distance).
- 13.13 As outlined in NHS Healthy Urban Development Unit (HUDU) guidance<sup>141</sup>, the Royal College of GPs recommends that a ratio of one GP (assumed fully-qualified and full-time equivalent, FTE) per 1,800 registered patients is a suitable benchmark to consider the capacity of primary healthcare facilities<sup>142</sup>. Application of this ratio to the current

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<sup>135</sup> Department for Education (2025) 'Get Information About Schools' [Online]. Available at: <https://get-information-schools.service.gov.uk/>

<sup>136</sup> Ibid.

<sup>137</sup> Millais School is planned to become co-educational as of September 2026, with a PAN of 300 and 50:50 gender split.

<sup>138</sup> Ibid.

<sup>139</sup> Total capacity of the school is 26 students, suggesting this caters for students with very specific needs

<sup>140</sup> NHS (2025) 'Find a GP' [Online]. Available at: <https://www.nhs.uk/service-search/find-a-gp>

<sup>141</sup> Healthy Urban Development Unit (2009) HUDU Planning Contribution Model: Guidance Notes

<sup>142</sup> Note that this is only an indicative measure of healthcare capacity, and cannot account for site-specific factors, such as the floorspace, age, quality and configuration of individual facilities.

staff and patient numbers at the Billingshurst Surgery<sup>143</sup> indicates that the surgery currently provides one fully-qualified FTE GP per 1,333 patients, which is below the recommended ratio.

#### **Active Travel and Sustainable Transport Accessibility**

- 13.14 There are multiple Public Right of Way (PRoW) crossing through the Site including: BIL 1327 (west to east); BIL 1326 (north west to south west); and BIL 1335 (north to south), providing active travel options to connect across the A272, to the local centre of Billingshurst and the railway station.
- 13.15 Bus routes 64, 69 and 100 pass along Billingshurst High Street, with the closest stop located c. 5-minutes walking distance (0.2 miles) from the Site. They provide regular services to Loxwood, Horsham, Worthing, Arundel and Burgess Hill.
- 13.16 The closest railway station is located in Billingshurst town centre (c. 1.3 miles to the south of the Site), where services run to London Victoria, Bognor Regis, Portsmouth, Gatwick Airport and Chichester.

#### **Public Health Profile**

- 13.17 The Government's Office for Health Improvement & Disparities (OHID) reports<sup>144</sup> on various indicators regarding health outcomes in HDC in comparison to the county of West Sussex<sup>145</sup> and national benchmarks, a summary of which are presented below:
- Life expectancies for men (81.9 years) and women (85.4 years) in HDC are higher than in West Sussex (respectively 80.4 and 84.6 years) and nationally (respectively 79.3 and 83.2 years);
  - A lower percentage of the adults in HDC (60%) are classified as overweight or obese than across West Sussex (63%) and England (65%). Childhood prevalence of obesity (including severe obesity) is also lower in HDC (where 14% of Year 6 children are obese) than in West Sussex (19%) and England as a whole (22%);
  - A notably higher percentage of adults are physically active<sup>146</sup> in HDC (78%) than in West Sussex (70%), and in England as a whole (67%); and
  - As an important wider determinant of health, the proportion of children in relative low-income families<sup>147</sup> in HDC (10%) is notably lower than both the county rate (14%) and the national rate (22%).

#### **Proposed Scope of Assessment**

- 13.18 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an

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<sup>143</sup> NHS Digital (2025) General Practice Workforce: August 2025

<sup>144</sup> Office for Health Improvement & Disparities (2025) Local Authority Health Profiles: Horsham

<sup>145</sup> Public health data is reported at the county level (West Sussex), as LEP data is not available.

<sup>146</sup> Defined as undertaking a minimum of 150 minutes of moderate physical activity (e.g. brisk walking; cycling for travel or leisure; playing individual or team sports; gym exercises; gardening) per week.

<sup>147</sup> 'Relative low-income households' defined as those with income below 60% of the median in that year.

appropriate evidence base has been provided to justify the ‘scoping out’ of these effects ensuring the EIA and ES only assess those effects considered ‘likely’ to be significant.

#### **Effects Unlikely/Not Significant**

- 13.19 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the Preliminary Environmental Management Plan (PEMP) provided in **Appendix 2.1**.

#### ***Social cohesion, inclusive design and access to community facilities during operation***

- 13.20 Developments should connect with existing communities (for example through layouts and access points which avoid physical barriers and severance), whilst land use and spaces should encourage social interaction, taking into account principles of inclusive and age-friendly design.
- 13.21 The Site is currently predominantly agricultural land, and as such, the Proposed Development will result in no displacement of any existing residential communities. The Site’s location on the edge of a well-established residential area, will enable coherent integration with existing residential and commercial areas and social infrastructure.
- 13.22 Along with residential uses, the Proposed Development will deliver a 2 FE Primary School, new community centre, retail space, sports facilities, a country park and new open space, which will be accessible to future residents, workers and visitors of the Site and other potential users (including existing neighbouring communities). These uses should foster social interaction, help to strengthen social cohesion and provide a focal point for community activities.
- 13.23 New public realm will be implemented with a strong consideration of principles related to inclusive design, taking account of guidance<sup>148</sup> regarding best practice for ensuring that developments can be accessed and used by all in a way that effectively fosters social connections, recognising and accommodating differences in the way people use the built environment as a result of factors such as age and disability. The new public realm will therefore further support accessibility and social cohesion.
- 13.24 The Proposed Development is also located in close proximity to the existing Billingshurst Recycling Centre. This is open to the public and will allow existing and future residents to dispose of their unwanted household items, helping to contribute to the sustainable treatment of waste in the locality and minimise the potential for anti-social behaviour in terms of fly-tipping and other unsuitable disposal of waste.
- 13.25 Whilst the proposals are considered to be beneficial in terms of supporting social cohesion and delivering inclusive design and access to community facilities for the Proposed Development’s residents and existing local communities, such impacts are considered to impact a relatively small number of people and to a limited extent in the

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<sup>148</sup> Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance: Housing for older and disabled people – Inclusive Design (para 017)

context of the baseline provision of services in the locality of the Site and the defined local impact area.

- 13.26 Therefore, given the availability of proposed on-Site uses as well as existing local provision, social cohesion, inclusive design and access to community facilities for the Proposed Development's residents and existing local communities is not considered to be significant, and will not be considered further in the EIA or reported in the ES.

***Crime reduction and community safety during operation***

- 13.27 Sites should be kept secure during construction to ensure that the potential for crime and anti-social behaviour is minimised. As such site security arrangements during the construction stage will be in line with the requirements set out in the Construction (Design and Management) Regulations 2015<sup>149</sup>.
- 13.28 Once operational, developments should incorporate design elements and site management measures to help 'design out' crime, to help people feel secure, again, minimising the potential for crime and anti-social behaviour. As such, the design of the Proposed Development will be informed by 'Secure by Design' principles and appropriate design will be implemented to ensure that the potential for crime and anti-social behaviour is minimised.
- 13.29 Therefore, crime reduction and community safety for the Proposed Development's residents, workers and visitors and existing local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Access to healthy food during operation***

- 13.30 Access to healthy and nutritious food can improve diet and prevent chronic diseases related to obesity. Healthy food options should be available and easily accessible to those using and working at new developments to enable and promote healthy lifestyles. Although the obesity rates in HDC are notably low in comparison to wider geographies, it is an important consideration for new development in the area.
- 13.31 As set out in **Chapter 4**, the Proposed Development will include retail provision (use Class E (a)). Whilst end-use occupiers have not yet been confirmed at this stage, it is likely that a proportion of floorspace will be occupied by convenience retail uses from which healthy food options will be available.
- 13.32 There are a number of smaller food-stores and larger supermarkets located in Billingshurst, including a Lidl and Morrisons (located opposite the Site, across the A29), a Co-op (opposite the Site, adjacent to Platts Roundabout), as well as smaller convenience stores on Billingshurst High Street, including Morrisons Daily, Sainsburys Local as well as Billingshurst Butchers, located a c. 7 minute walking distance from the Site (0.3 miles), and so will be accessible by the new residents.
- 13.33 Therefore, given the existing available options for healthy food, and anticipated future on-site provision, access to healthy food for the Proposed Development's residents and

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<sup>149</sup> Secretary of State (2015) Construction (Design and Management) Regulations 2015.

existing local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Access to early years, primary education and special educational needs (SEN) facilities***

- 13.34 Strong, vibrant, sustainable and cohesive communities require good quality, accessible public services and infrastructure. Access to education facilities has a direct positive effect on human health and is vital towards ensuring employment prospects, personal and social development and strong communities.
- 13.35 The DfE's Pupil Yield Data Dashboard<sup>150</sup> provides pupil yield multipliers, which can be used to estimate the additional pupil demand generated by a proposed development within a specific local authority area.
- 13.36 Based on application of DfE Pupil Yield multipliers, it is anticipated that the 1,100 homes at the Proposed Development could generate demand for up to:
- 89 early years places;
  - 339 primary school places; and
  - 9 SEN places.
- 13.37 It is important to note that the above calculation is a 'worst-case' (i.e. highest demand) scenario, which assumes that all children moving into a new housing development are new to the area. It should, however, be noted that a proportion of children moving into housing developments will already reside in the area and may continue in their existing schools or move at the end of a key stage.
- 13.38 As set out in **Chapter 4**, the Proposed Development will include a 2 FE primary school (accommodating 420 children), as well as a pre-school and SEN provision, to meet the demand it will generate for early years<sup>151</sup>, primary and SEN pupils<sup>152</sup>. This is in addition to existing provision in the locality.
- 13.39 Therefore, the pupil demand generated by the Proposed Development for early years, primary and SEN provision is likely to be accommodated through the provision of new on-site facilities, and so is unlikely to be significant, and will not be considered further within the EIA or reported in the ES.

***Access to open space and sports and recreation facilities***

- 13.40 Providing secure, convenient and attractive open/green space, public amenity space and facilities for sports and leisure activities can lead to increased levels of physical activity and reduce levels of heart disease, strokes and other ill-health problems that are associated with both sedentary occupations and stressful lifestyles. There is also a

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<sup>150</sup> Department for Education (2025) Estimating Pupil Yield from Housing Development in Horsham [Online]. Available at: <https://department-for-education.shinyapps.io/pupil-yields-dashboard/>

<sup>151</sup> It is also possible that further provision could be accommodated on Site, if childminder/s reside at the Proposed Development, and offer this service. This is however dependent on the profile of residents who occupy the future homes.

<sup>152</sup> As referenced above, given the bespoke nature of SEND education provision, which is dependent on the individual needs of children, students with additional needs may opt to attend schools which are further afield.

growing body of evidence that access to open spaces and facilities for exercise is important in helping to maintain and/or improve mental health<sup>153</sup>.

- 13.41 As noted above, the Proposed Development will deliver new sports facilities, open space and – in the north-western part of the Site – a country park, which will be accessible to future residents of the Site and existing local communities. Open spaces will comprise a range of typologies, including children’s play space, and areas for relaxation and recreation, to meet a variety of local needs. Sports facilities will include a tennis centre and tennis courts (indoor and outdoor), multi-use games area (MUGA) as well as football facilities (Use Class E(d), F2, Sui Generis).
- 13.42 A variety of existing open space and recreation provision is also already present in the immediate locality of the site and more widely across Billingshurst. Provision includes: Jubilee Fields (which has a skate park, football club, and youth football club); Hilland Road Playground; Manor Field Playground; Station Road Community Gardens (with a basketball court and play area).
- 13.43 In addition, The Mens Nature Reserve, run by the Sussex Wildlife Trust, is located 5.1 miles (a c. 9-minute drive) from the Site, an area of ancient woodland, and could provide further access to nature for future residents of the Proposed Development.
- 13.44 Existing local built provision includes Billingshurst Leisure Centre (located 1.2 miles from the Site, which includes an indoor swimming pool, gym, fitness studio and trampolining facilities).
- 13.45 The proposals are considered to be beneficial in terms of delivering new open spaces and sports facilities, which will be accessible to the Proposed Development's residents and existing local communities (all of whom will also be able to access existing wider open space and sports and recreation provision in the locality). Such impacts are, however, considered to impact a relatively small number of people, and to a limited extent in the context of the baseline provision of services in the locality of the site and the defined local impact area.
- 13.46 Therefore, access to open space and sports and recreation facilities for the Proposed Development residents and existing local communities is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Access to training opportunities [labour force]***

- 13.47 Employment and income are key determinants of personal and societal socio-economic and physical and mental health and wellbeing, whilst unemployment is known to be a significant contributor to poverty, illness and a reduction in personal and social esteem. New development can improve people’s access to training opportunities; for example, through delivering apprenticeships and other employment and training programmes during the construction stage and on-Site once operational.
- 13.48 The Proposed Development could deliver opportunities for people to access training during construction (such as apprenticeships, placements and/or other education and

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<sup>153</sup> NHS Healthy Urban Development Unit (2019) Rapid Health Impact Assessment Tool (4<sup>th</sup> Edition)

skills initiatives), the scale and nature of which will be dependent on construction contractors.

- 13.49 It is, however, considered that – whilst a beneficial effect which could help meet local needs for training opportunities – these are likely to comprise only a limited proportion of the total jobs supported during the construction stage.
- 13.50 Whilst the Proposed Development also includes build of some employment generating uses which will be utilised during operation (care village, retail facilities, and a 2FE Primary School for example), the extent to which opportunities will be generated for people to access additional training is also considered to be relatively limited in nature.
- 13.51 Therefore, access to training opportunities for the labour force is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Access to active travel and sustainable transport options [Proposed Development's residents and existing local communities]***

- 13.52 Active travel and sustainable travel options should be accessible to those living and working at, and otherwise using, new developments to enable and promote healthy and sustainable lifestyles, through facilitating physical activity and zero / low emissions transport, such as walking, cycling and public transport options.
- 13.53 The Proposed Development will incorporate internal foot and cycleways which will link to the existing external active travel networks. This will provide connectivity across the A272 to local amenities, including Billingshurst centre and the railway station. As noted in the baseline, multiple public rights of way (PRoWs) cross the Site, including BIL1327 (west to east); BIL 1326 (north west to south west); and BIL 1335 (north to south). As a worst case, these PRoWs may be temporarily closed or diverted during construction, until a time where they are permanently re-opened. If continued use is deemed appropriate during construction, routes will be protected by fencing and/or hoarding, to allow for safe continued access.
- 13.54 The Proposed Development will incorporate new pedestrian and cycle access routes that will provide both access throughout the development as well as wider connectivity across the A272 to local amenities including the local centre and the railway station. All three PRoWS's that cross the Site will also be retained on their current alignment as part of the Proposed Development.
- 13.55 As also noted in the baseline, the Proposed Development will be well-served by the existing public transport network. Bus routes 64, 69 and 100 pass along Billingshurst High Street, with the closest stop located a c. 5-minute walking distance (0.2 miles) from the Site. They provide regular services to Loxwood, Horsham, Worthing, Arundel and Burgess Hill. The closest railway station is located in Billingshurst town centre (c. 1.3 miles to the south of the Site), where services run to London Victoria, Bognor Regis, Portsmouth, Gatwick Airport and Chichester.
- 13.56 The Site's accessible location will contribute to maximising the local residential population's access to active travel and sustainable travel options, which will be beneficial and facilitate enhancement of the health and wellbeing of future Site users. It is albeit acknowledged that such impacts are considered to impact a relatively small

number of people and to a limited extent in the context of the baseline provision of services in the locality of the Site and the defined local impact area.

- 13.57 Therefore, access to active travel and sustainable transport options for the Proposed Development's residents and existing local communities are unlikely to be significant and will not be considered further in the EIA or reported in the ES in the context of the topic of socio-economics and human health.

#### Effects Likely/Significant

- 13.58 Table 13.1 outlines the effects (and associated receptor[s]) that are considered to be likely and significant and therefore will be assessed within the EIA and reported in the ES.

**Table 13.1: Potential Likely Significant Effects and Sensitive Receptors**

| Effect                                        | Receptor(s)                                       | Applicable Stage(s) |
|-----------------------------------------------|---------------------------------------------------|---------------------|
| Employment generated during construction      | Labour force                                      | Construction        |
| Provision of new housing                      | People requiring housing in the local impact area | Operation           |
| Access to secondary education facilities      | Local secondary education facilities and pupils   | Operation           |
| Access to primary healthcare facilities (GPs) | Local primary healthcare facilities and patients  | Operation           |

#### Assessment Methodology of Effects Likely/Significant

- 13.59 The following background surveys/studies have been/will be completed.

**Table 13.2: Background Surveys/Studies**

| Survey/Study/Analysis/Evaluation                                                     | Overview                                                                              | Date of Completion |
|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--------------------|
| <b>Completed</b>                                                                     |                                                                                       |                    |
| Desk based study of publicly accessible socio-economic and human health data         | Data obtained to understand prevailing socio-economic and human health conditions     | November 2025      |
| <b>Pending</b>                                                                       |                                                                                       |                    |
| Economic Impact Modelling                                                            | Modelling conducted to establish level of magnitude and inform significance of effect | Winter 2025/26     |
| Further desk-based study of publicly accessible socio-economic and human health data | Data obtained to understand prevailing socio-economic and human health conditions     | Winter 2025/26     |

- 13.60 Appropriate study areas will be defined which, in the absence of formal guidance, will be based on an understanding of relevant local and wider economic geographies and a consideration of the extent to which socio-economic and human health effects are likely to be contained therein. A local impact area will be defined to cover the administrative area of HDC, with a wider impact area defined to cover C2C LEP. These are established geographical areas that also reflect existing patterns of labour force containment, recorded by the 2021 Census<sup>154</sup>.
- 13.61 Best practice and methodological guidance will be drawn upon as appropriate to inform key elements of the assessment, including the Additionality Guide<sup>155</sup> produced by the Homes and Communities Agency (HCA, now known as Homes England) and ISEP guidance for the effective scoping of human health<sup>156</sup> and determining significance in EIA<sup>157</sup>. Net additional economic impacts will be presented, accounting for a range of economic additionality factors such as leakage<sup>158</sup>, displacement<sup>159</sup> and multiplier effects<sup>160</sup>.
- 13.62 The sensitivity of receptors will be determined by way of observed change in receptors locally compared to local, regional and national trends. Through observation of a receptor's capacity for change relative to wider comparator areas and / or national standards, the sensitivity of receptors locally will be observed. Consideration will also be given to the priority attributed to specific receptors in strategy and policy terms, particularly in the case of qualitative receptors and those where quantitative evidence is not available. The assignment of sensitivity will be based on professional judgement.
- 13.63 Once the sensitivity of the receptor has been identified, the change attributable to the Proposed Development will be benchmarked against the observed rate of change in the corresponding social, economic or health-related baseline. This will allow for a relative assessment of the magnitude of change that is attributable to the Proposed Development to be conducted.
- 13.64 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects will be determined following this through professional judgment.

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<sup>154</sup> As outlined in the baseline section.

<sup>155</sup> Homes & Communities Agency (2014. Additionality Guide (4<sup>th</sup> Edition)

<sup>156</sup> ISEP (2022) Effective Scoping of Human Health in Environmental Impact Assessment

<sup>157</sup> ISEP (2022) Determining Significance for Human Health in Environmental Impact Assessment

<sup>158</sup> The measure of the extent to which impacts (such as employment) will occur outside of the defined local and wider impact areas.

<sup>159</sup> The measure of the extent to which the Proposed Development will lead to existing businesses or employees within the defined local and wider impact areas relocating activities to the Proposed Development, as opposed to the attraction of new investment and employment arising from the Proposed Development.

<sup>160</sup> The measure of further economic activity (such as employment, expenditure or income) associated with supply chain expenditure, additional local income (from employment) and longer-term expenditure effects.

## Limitations and Assumptions

13.65 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- The assessment is desk-based and therefore reliant on data and information obtained from a variety of official published sources (such as the ONS's 2021 Census<sup>161</sup> and BRES<sup>162</sup>). No further verification of these sources will be undertaken (unless otherwise stated in the ES). Each data source has methodological limitations related to data collection and surveys only represent the socio-economic context at a specific point in time;
- The future baseline will draw upon employment forecasts produced by Experian<sup>163</sup> and education forecasts produced by the DfE<sup>164</sup>. There are known uncertainties to using such trend-based forecasts (especially in the current context of economic uncertainty), however, the use of such forecasts is considered appropriate for drawing conclusions about how the economy and labour market might change in the future; and
- Where necessary, professional and realistic assumptions will be made and applied.

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<sup>161</sup> ONS via Nomis (2025) Census 2021

<sup>162</sup> ONS via Nomis (2024) Business Register and Employment Survey: 2024

<sup>163</sup> Experian (2025) Local Market Forecasts Quarterly: June 2025

<sup>164</sup> Department of Education (2025) School capacity: Academic year 2024/25

## 14. Climate Change

- 14.1 The UK Climate Change Projections (UKCP18)<sup>165</sup> set out that climate change is projected to lead to increasing annual temperatures, decreasing summer rainfall and increasing winter rainfall as a result of increasing global Greenhouse Gas (GHG) emissions. This applies to the UK, including the Site.
- 14.2 In this context the EIA Regulations require the consideration of Climate Change, including the resilience of the Proposed Development to the effects of climate change, and how the Proposed Development mitigates its impact on climate change through GHG emissions.
- 14.3 ISEP (formerly IEMA) has prepared guidance on Climate Change for EIA practitioners which has been used in the Climate Change scoping assessment for the Proposed Development:
- Assessing Greenhouse Gas Emissions and Evaluating their Significance<sup>166</sup> ('GHG assessment guidance') - which sets out how GHG emissions should be considered and assessed.
  - EIA Guide for Climate Change Resilience and Adaptation<sup>167</sup> ('Climate Change Resilience guidance') - setting out guidance on the scope and consideration of climate projections and effects on development. Crucially this includes a recommendation for adaptation measures to consider the 2080s high emissions scenario projections as a worst-case scenario.

### Technical Baseline

#### Greenhouse Gas Emissions

- 14.4 Current baseline conditions regarding GHG emissions have been established at the local authority (Horsham District Council and West Sussex) and the regional (South East) levels from the latest (2023) UK Government local authority and regional carbon dioxide emissions national statistics: 2005 to 2023<sup>168</sup> as presented in Table 14.1.
- 14.5 The Site currently comprises predominantly agricultural land. The Site's current GHG emissions are unknown in quantitative terms and for the purpose of the GHG emissions assessment, baseline GHG emissions from the Site are assumed to be zero.

**Table 14.1: Baseline Local & Regional GHG Emissions**

| Geographical Area        | 2023 GHG Emissions (tonnes CO <sub>2</sub> e) |
|--------------------------|-----------------------------------------------|
| Site                     | 0 (assumed)                                   |
| Horsham District Council | 593,500                                       |

<sup>165</sup> <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index>

<sup>166</sup> 2022\_iema\_greenhouse\_gas\_guidance\_eia.pdf

<sup>167</sup> iema-eia-climate-change-resilience-june-2020.pdf

<sup>168</sup> UK local authority and regional greenhouse gas emissions statistics, 2005 to 2023 - GOV.UK

| Geographical Area | 2023 GHG Emissions (tonnes CO <sub>2</sub> e) |
|-------------------|-----------------------------------------------|
| West Sussex       | 3,182,700                                     |
| South East        | 38,963,800                                    |

- 14.6 The future baseline GHG emissions have been established in the form of the carbon budget set for the UK<sup>169</sup> as presented in Table 14.2. This will be used to contextualise GHG emissions from the Proposed Development in order to establish the magnitude of its net GHG effect.

**Table 14.2: UK Carbon Budget (tCO<sub>2</sub>e)**

| Period                                                                                                             | UK            |
|--------------------------------------------------------------------------------------------------------------------|---------------|
| 2018 – 2022                                                                                                        | 2,544,000,000 |
| 2023 – 2027                                                                                                        | 1,950,000,000 |
| 2028 – 2032                                                                                                        | 1,725,000,000 |
| 2033 – 2037                                                                                                        | 965,000,000   |
| 2038 – 2042                                                                                                        | 535,000,000*  |
| 2043 – 2047                                                                                                        | Not yet set   |
| 2048 - 2050                                                                                                        | Not yet set   |
| * Published by the Committee on Climate Change in February 2025 but not yet incorporated into law <sup>170</sup> . |               |

#### Climate Conditions

- 14.7 Baseline climate conditions for the Site area have been established from the Met Office's closest automatic weather station at North Heath<sup>171</sup>, circa 5km south of the Site. Average monthly climatic conditions for the period 1991-2020 period<sup>172</sup> are summarised in Table 14.3, providing the baseline against which future climate projections reported in Table 14.4 are based.

**Table 14.3: Current climate baseline**

| Description                             | Temperature / Rainfall |
|-----------------------------------------|------------------------|
| Summer maximum average temperature (°C) | 22.3                   |
| Average summer rainfall (mm per month)  | 60.9                   |

<sup>169</sup> <https://www.gov.uk/guidance/carbon-budgets>

<sup>170</sup> The Seventh Carbon Budget - Climate Change Committee

<sup>171</sup> North Heath Location-specific long-term averages

<sup>172</sup> The closest data available to the assessment period used in the preparation of the UK Climate Projections

| Description                            | Temperature / Rainfall |
|----------------------------------------|------------------------|
| Average winter rainfall (mm per month) | 84.7                   |

- 14.8 Future baseline climate conditions for the Site area have been established from the Met Office's latest climate projections UKCP18 for the 25km OS grid square within which the Site is located (512500, 137500).
- 14.9 The projections comprise forecast changes relative to 1991 to 2020 baseline conditions for annual and seasonal temperatures and rainfall. In accordance with ISEP's Climate Change Resilience guidance, projections are taken from the "high" emissions scenario (known as "RCP8.5"), 50th percentile (i.e. median) scenario for the 2020s, 2040s, 2060s, and 2080s which encompass the anticipated construction and operational stage of the Proposed Development.
- 14.10 Projected changes to seasonal and annual temperature and rainfall relative to the baseline conditions, which could result in severe weather effects such as droughts, floods and heat waves, are provided in Table 14.4.

**Table 14.4: Future climate baseline**

|                                         |                             | 2020s              |                        | 2040s              |                        | 2060s              |                        | 2080s              |                        |
|-----------------------------------------|-----------------------------|--------------------|------------------------|--------------------|------------------------|--------------------|------------------------|--------------------|------------------------|
| Description                             | Temp / Rainfall to baseline | Change to baseline | Future Temp / rainfall | Change to baseline | Future Temp / rainfall | Change to baseline | Future Temp / rainfall | Change to baseline | Future Temp / rainfall |
| Summer maximum average temperature (°C) | 22.3                        | 1.65               | 24.0                   | 2.27               | 24.6                   | 3.89               | 26.2                   | 5.95               | 28.3                   |
| Average summer rainfall (mm per month)  | 60.9                        | -9%                | 55.7                   | -14%               | 52.4                   | -23%               | 46.8                   | -38%               | 37.5                   |
| Average winter rainfall (mm per month)  | 84.7                        | 7%                 | 90.9                   | 9%                 | 92.6                   | 14%                | 96.8                   | 22%                | 103.1                  |

- 14.11 In addition to increasing temperatures and changing rainfall patterns, other potential climatic changes include:
- Increasing wind speed; and
  - Increasing winter storms, including more severe storms.

- 14.12 Specific metrics for these changes are not available. It is noted that while wind speeds may increase but these changes are small compared to differences between individual years, and further research is required to determine long term projections of winter storm activity.

### Proposed Scope of Assessment

- 14.13 The UK Climate Change Risk Assessment (UKCCRA)<sup>173</sup>, updated in 2021, identifies potential risks and impacts of climate change across a number of areas including Infrastructure, Health, Communities and the Built Environment. Key risks from the UKCCRA which relate to the Proposed Development are summarised below.
- N1 – Risks to terrestrial species and habitats from changing climatic conditions and extreme events;
  - I2 – Risks for infrastructure from flooding;
  - I7 – Risks to infrastructure from subsidence;
  - I8 – Risks to public water supplies from reduced water availability;
  - H1 – Risks to health and wellbeing from high temperatures;
  - H3 – Risks to people, communities and buildings from flooding;
  - H5 – Risks to building fabric;
  - H10 – Risks to water quality and household water supplies;
  - B1 – Risks to businesses from flooding;
  - B3 – Risks to business from water scarcity; and
  - B5 – Risks to business operations due to infrastructure disruption and high temperatures.
- 14.14 Based on the Climate Projections and risks from the UKCCRA, key receptors which may be impacted by climate change include:
- The **Global Climatic System** from additional GHG emissions;
  - **Construction Employees** may be impacted due to overheating from increasing temperatures impacting Human Health;
  - **Site Infrastructure** may be impacted due to changing ground conditions as a result of increased rainfall and flood risk;

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<sup>173</sup> <https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/>

- **Construction Operations** may be impacted by changing weather patterns leading to risks of flooding, pollution and impacts on **Air Quality** as a result of increased dust generation;
- **Site Habitats and Species** impacted by changing climate space; and
- **Site Operations, Infrastructure** and **Site Users** may be impacted by decreasing summer rainfall and water availability, increasing summer temperatures and overheating, as well as increased risks of flooding due to increasing winter rainfall.

14.15 The below sets out the proposed scope of assessment based on an understanding of the characteristics of the Site, surrounding area and the Proposed Development (**Chapter 4**). Where environmental effects are considered unlikely to be 'significant', an appropriate evidence base has been provided to justify the 'scoping out' of these effects ensuring the EIA and ES only assess those effects considered 'likely' to be significant.

**Effects Unlikely/Not Significant**

14.16 The following effects are considered unlikely to be significant and therefore will not be considered further within the EIA or reported in the ES. A factual evidence base has been provided below to support this. Where mitigation has been used to inform this judgement, the identified mitigation has been captured within the PEMP (**Appendix 2.1**).

***Increasing summer temperatures affecting human health during construction***

14.17 Increasing summer temperatures may lead to health and safety risks for construction employees.

14.18 A Construction Environmental Management Plan (CEMP), secured by planning condition, will be prepared to support the construction of the Proposed Development and will set out typical climate change adaptation measures to reduce risks to health from overheating such as provision of shaded refuges, suitable PPE and potable water supplies.

14.19 Therefore, the effect of increasing summer temperatures on construction employees and their health is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changing annual temperatures / rainfall patterns and changes to air quality during construction, water supply, flood risk during construction***

14.20 Changing annual temperatures and rainfall patterns may lead to a reduction of water supply, an increased risk of flooding (and damage), and an impact on air quality as a result of dust generation.

14.21 The CEMP will include measures to protect receptors from potential climate change effects through construction. This will include installation of a temporary surface water drainage system to manage and direct runoff from construction (further details in **Chapter 12**). The CEMP will also include measures to monitor and reduce potable water use.

14.22 It is anticipated that dust and particulate matter emissions produced during demolition and construction activities would be controlled through the implementation of a CEMP. This CEMP will be informed by the Institute of Air Quality Management (IAQM) guidance and would include prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate and set out requirements for ongoing monitoring. This would include any enhanced dust suppression measures to reduce the risk of dust from increased summer temperatures.

14.23 In this context, changing annual temperatures / and rainfall patterns and changes to water supply and air quality is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes to future climate including temperature and rainfall and risk to building infrastructure and future occupants during operation***

14.24 Changes to future climate including temperature and rainfall may cause ground conditions to change which may impact on building foundations and structures and hence also future occupants.

14.25 The Building Regulations<sup>174</sup> require new developments to consider the impact of ground movement in foundation design. In this context foundations will be designed with safety factors to future proof the buildings.

14.26 Therefore, the effect of changes to future climate including temperature and rainfall upon site infrastructure and future occupants is not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes to annual rainfall impacting operational water demand***

14.27 The Proposed Development will lead to an increased demand on potable water supplies, compounded by decreasing summer rainfall.

14.28 The design of the Proposed Development will include water saving measures, such as water saving fixtures and fittings. To reduce water consumption, the Proposed Development will set targets for residential and non-residential development, including:

- Residential - Homes to achieve the Building Regulations higher water efficiency standard of 110l/p/d.
- Non-residential - As a minimum the equivalent of two Wat01 Water Efficiency BREEAM Credits.

14.29 Therefore, the effect of changes to annual rainfall upon operational water demand is not considered to be significant and will not be considered further in the EIA or reported in the ES.

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<sup>174</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/540328/BR\\_PDF\\_AD\\_L2A\\_2013\\_with\\_2016\\_amendments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540328/BR_PDF_AD_L2A_2013_with_2016_amendments.pdf)

***Changes to annual rainfall increasing flood risk***

- 14.30 Increasing winter rainfall will increase the risk of flooding. As stated in **Chapter 12** the majority of the Site is in Flood Zone 1. There are small areas of Flood Zone 2 and 3 close to the River Arun and along existing watercourses albeit all infrastructure classified as 'more vulnerable' will be located outside of areas highlighted as being in a Flood Zone 2 or 3 as defined on the EA flood maps. Areas of surface water flood risk are shown by the EA mapping are mainly associated with existing watercourses.
- 14.31 As part of the forthcoming Water Environment chapter and supporting Flood Risk Assessment and Drainage Strategy climate change allowances (45%) will be utilised to consider the effects of increasing winter rainfall, ensuring development is located outside of flood risk zones and drainage systems are adequately sized.
- 14.32 The proposed surface water drainage system will not increase the runoff rate and will include an allowance for climate change in accordance with relevant guidance. Sustainable Drainage Systems (SuDS) will be incorporated into the surface water drainage network.
- 14.33 Therefore, changes to annual rainfall impacting site operations, structures and site users are not considered to be significant and will not be considered further in the EIA or reported in the ES.

***Changes to future climate and resilience of site habitats and species during operation***

- 14.34 Changes to future climate including temperature and rainfall, could impact upon site habitats and species.
- 14.35 The Proposed Development will adhere to the ecological hierarchy of avoid, mitigate and, as a last resort, compensate. The Proposed Development will retain, protect and enhance existing site habitats.
- 14.36 A Biodiversity Net Gain (BNG) assessment will be prepared to support the Proposed Development and early considerations will be made to ensure that the proposals maximise biodiversity value alongside development. Green infrastructure will be provided as part of the Proposed Development to achieve at least a 10% Biodiversity Net Gain.
- 14.37 These measures will help to mitigate the anticipated impacts of climate change in accordance with the England Biodiversity Strategy<sup>175</sup> and Natural England Climate Change Adaptation Manual<sup>176</sup>.
- 14.38 Therefore, changes to future climate and resilience upon site habitats and species is not considered to be significant and will not be considered further in the EIA or reported in the ES.

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<sup>175</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

<sup>176</sup> <http://publications.naturalengland.org.uk/publication/5679197848862720>

***Higher summer temperatures and risk of building overheating during operation***

14.39 Higher average summer mean and daily maximum temperatures as a result of climate change may lead to building overheating, adversely affecting the health, well-being and productivity of occupants.

14.40 The following mitigation is proposed:

- Homes will be assessed in line with the requirements of Building Regulations Part O, taking account of future climate change.
- For non-residential development as part of the detailed design, an overheating assessment will be prepared in line with CIBSE TM52 assessing and reducing the risk of summer overheating taking into account future climate scenarios.

14.41 Where necessary measures to reduce the risk of overheating will be specified in accordance with the cooling hierarchy. Appropriate cooling and ventilation features will be provided for future site users (i.e. employees and visitors) in occupation buildings in line with UK standards and specifications, such as HSE's ventilation in the workplace<sup>177</sup>. Such buildings will also not be continuously occupied.

14.42 Therefore, higher summer temperatures and risk of building overheating to future occupants is not considered to be significant, and will be assessed outside of the ES process.

**Effects Likely/Significant**

14.43 Table 14.5 summarises the effects (and associated receptor) that are considered to be likely significant and will therefore be assessed within the EIA and reported in the ES.

**Table 14.5: Potential Likely Significant Effects and Sensitive Receptors**

| Effect        | Receptor(s)            | Applicable Stage(s)        |
|---------------|------------------------|----------------------------|
| GHG Emissions | Global Climatic System | Construction and Operation |

**Assessment Methodology of Effects Likely/Significant**

14.44 The following background surveys/studies have been/will be completed.

**Table 14.6: Background Surveys/Studies**

| Survey/Study/Analysis/<br>Evaluation | Overview                                                                                                            | Date of Completion |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------------|
| <b>Pending</b>                       |                                                                                                                     |                    |
| GHG Assessment                       | Estimate of the Proposed Development's GHG emission during construction and operation and contextualisation against | 2026               |

<sup>177</sup> <https://www.hse.gov.uk/ventilation/overview.htm>

| Survey/Study/Analysis/<br>Evaluation | Overview                                                           | Date of Completion |
|--------------------------------------|--------------------------------------------------------------------|--------------------|
|                                      | local and national baseline emissions and future UK carbon budget. |                    |

- 14.45 The assessment of GHG emissions will be undertaken in accordance with ISEP's GHG Assessment Guidance.
- 14.46 The Site will form the principal study area for the assessment; however the assessment will include off-site GHG emissions such as those associated with the manufacture and transportation of construction materials, and those associated with the off-site generation (e.g. at a power station) of grid electricity consumed by the operational Proposed Development.
- 14.47 The GHG assessment of the Proposed Development will consider both the construction and operational stages.
- 14.48 GHG emissions from the construction and operation of the proposed buildings will be estimated using recognised industry benchmarks/targets, for example RIBA 2030 Climate Challenge/ LETI 2020 Design targets which set out targets on embodied carbon and operational energy demand.
- 14.49 In line with ISEP's GHG Assessment guidance, GHG emissions resulting from the construction and operation stages of the Proposed Development will be evaluated in the context of baseline GHG emissions from the Site, local authority's administrative area and UK region, as well as the future carbon budgets for the UK.
- 14.50 Furthermore, and in accordance with ISEP's GHG Assessment guidance, consideration will also be given to the contribution of the Proposed Development to a science-based net zero trajectory in line with the 2015 Paris Agreement's 1.5°C pathway.
- 14.51 The assessment of likely significant effects to sensitive receptors will consider the sensitivity of the receptor (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. The global climate system is the receptor for GHG emissions and is considered highly sensitive in accordance with ISEP guidance.
- 14.52 The significance of the Proposed Development's net GHG effect will then be determined by considering the magnitude of its net GHG emissions effect in conjunction with whether it makes an appropriate contribution to the UK's net zero trajectory for a project of its type, and also using professional judgment.

### **Limitations and Assumptions**

- 14.53 To ensure transparency within the EIA process, the following limitations and assumptions have been identified:

- Activity Data – In estimating construction and operational stage GHG emissions, third party emissions factors and benchmarks may be applied to estimated parameters, including energy demand. These factors and benchmarks may potentially not fully reflect the actual construction and operational performance of the Proposed Development, however, the proposed approach is nevertheless considered to represent the best available option at this stage.
- Emission Factors – The future UK electricity grid factors sourced from the Department for Energy Security and Net Zero (DESNZ) are projections which may not reflect the actual emissions associated with grid electricity consumption in future. However, DESNZ projections have slightly underestimated the rate of grid decarbonisation in recent years, so any inaccuracy in these projections may serve to over-estimate as well as under-estimate GHG emissions associated with the Proposed Development's future electricity demand.

## 15. Approach to the Assessment of Cumulative Effects

### Overview

- 15.1 This chapter establishes the methodology for the assessment of cumulative effects arising from the Proposed Development.
- 15.2 The EIA Regulations, through Schedule 4, Paragraph 5e and Regulation 4, Paragraph 2, requires the consideration of the culmination of effects with other “*existing and/or approved projects*”, as well as the interaction between effects identified at the project level.
- 15.3 To accord with the EIA Regulations and best practice guidance, the following types of cumulative effects will be considered within the EIA:
- **Effect interactions** (to accord with Regulation 4, Paragraph 2): the interactions and combination of environmental effects of the Proposed Development affecting the same receptor, either within the Site or in the local area; and
  - **In-combination effects** (to accord with Schedule 4, Paragraph 5(e)): the interaction and combination of environmental effects of the Proposed Development with other existing or approved project (s) affecting the same receptor (hereinafter referred to as ‘Cumulative Projects’).

### Assessment Methodology

- 15.4 There is no widely accepted current methodology or best practice for the assessment of cumulative effects for projects under EIA Regulations. However, it is acknowledged that guidance on the approach to the assessment of in-combination cumulative effects for projects that fall under the Nationally Significant Infrastructure Project (NSIP) regime has been issued by the Planning Inspectorate<sup>178</sup>. However, as this is focused on NSIPs, it is not necessarily applicable to all projects / sectors.
- 15.5 Given this, the proposed assessment methodology set out below is based on the principles of the Planning Inspectorate guidance, an understanding of the receptors to be assessed through the ES, the nature of the Proposed Development, and professional judgement drawing on previous experience and knowledge at Turley.
- 15.6 The assessment of cumulative effects, for both effect interactions and in-combination effects, will be largely qualitative in nature. For some technical topics, quantitative data may be available (e.g. where modelling work is undertaken), facilitating a quantitative analysis of cumulative effects. Where quantitative analysis is possible, it will be fully detailed within the assessment in the ES.

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<sup>178</sup> Planning Inspectorate (2019) Advice Note Seventeen: Cumulative Effects assessment relevant to nationally significant infrastructure projects (Version 2). Available online - <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-17/>

- 15.7 In cases where information is not available, assumptions will be made based on professional judgement and clearly stated alongside any uncertainty as part of the assessment.

#### **Effect Interactions**

- 15.8 The assessment of effect interactions will follow a two-stage process, as follows.

##### ***Step 1 – Identification of potential effect interactions***

- 15.9 The assessment of effect interactions will consider the changes from baseline condition at common sensitive receptors, because of the Proposed Development.

- 15.10 Common sensitive receptors will be those that are assessed within two or more technical effects assessments provided within the ES. The assessment will be focused on residual effects only (i.e. following the implementation of scheme specific mitigation).

- 15.11 In order to identify where a potential common receptor is present, the receptors assessed through the ES will be categorised into the 'factors' / 'receptor groups' (termed 'receptor categories') outlined in Regulation 4, Paragraph 2 (and expanded on in Schedule 4, Paragraph 4) of the EIA Regulations. These are as follows:

- Population and human health.
- Biodiversity (for example fauna and flora).
- Land (for example land take).
- Soil (for example organic matter, erosion, compaction, sealing).
- Water (for example hydromorphological changes, quantity and quality).
- Air.
- Climate (for example greenhouse gas emissions, impacts relevant to adaptation).
- Material assets.
- Cultural heritage, including architectural and archaeological aspects.
- Landscape

- 15.12 A matrix of residual effect interactions will be formulated in the ES corresponding to the construction and operational stages of the Proposed Development.

- 15.13 The threshold for inclusion within the matrices will be set at a 'minor' level of effect as this is considered to address the potential for a number of residual effects that are not necessarily considered to be 'Significant' in isolation to become 'Significant' when they are considered collectively on a common sensitive receptor.

- 15.14 Where, through the application of the matrices, potential effect interactions are not identified, in that no specific common receptor(s) is identified, then it will be concluded that there are no effect interactions.
- 15.15 Where potential effect interactions are identified, a qualitative assessment will then be undertaken for the relevant receptor categories through Step 2 below.

***Step 2 – Qualitative appraisal***

- 15.16 The qualitative assessment will include the following:
- Clear identification of specific receptor(s) considered for each effect ‘contributing’ to a potential effect interaction to understand the common receptor (and their attributes, such as location etc.).
  - An appraisal where there are specific common receptors, considering.
    - Magnitude of change (or impact) of each residual effect;
    - Sensitivity (or value, importance, etc.) of the receptor / receiving environment to change;
    - Duration (of the effects individually and collectively utilising the short / medium / long-term criteria set out in **Chapter 2**) and reversibility of the effect;
    - If the effects are temporary and / or permanent;
    - If the effects are experienced / occur concurrently or sequentially; and / or
    - The geographical / spatial extent of the individual effects.
- 15.17 An overall qualitative assessment of the cumulative effects on the identified receptor categories will; then be made using the information contained within this ES and supporting appendices in **Volume 2** (where appropriate), and professional judgement.
- 15.18 Where possible, a conclusion on effect interactions will be provided discussing the likelihood of the effect interactions being ‘Significant’ or ‘Not Significant’.

**In-Combination effects**

- 15.19 The assessment of potential in-combination effects will be undertaken using the methodology outlined below.

***Step 1: Identification and evaluation of Projects for Consideration***

- 15.20 In order to identify relevant projects (referred to as ‘Cumulative Projects’) that could give rise to in-combination effects within the Proposed Development, a review of the following sources has been undertaken:
- HDC’s online register of projects<sup>179</sup>;

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<sup>179</sup> View and comment on planning applications | Horsham District Council

- Chichester District Council (CDC)'s online register of projects<sup>180</sup>;
- Landstack map function to identify current and historic planning applications from 1970<sup>181</sup>;
- Planning Inspectorate online register of projects<sup>182</sup>;
- Transport and Works Order Act online register of projects<sup>183</sup>;
- Parliament Hybrid Bills online register<sup>184</sup>.

15.21 In line with the EIA Regulations, this search has focused on projects and therefore is not inclusive of sites allocated within local plans, core strategy documents or supplementary planning documents.

15.22 In line with Planning Inspectorate Advice on Cumulative Assessment<sup>185</sup>, criteria and professional judgment have been used to determine whether to include or exclude projects from further assessment (i.e. apply proportionality), informed by aspects such as temporal scale, nature of development and other factors.

15.23 As such, the search has been focused on projects within 2.5km of the Site, acknowledging the maximum extent of likely receptors and nature of effects to be reported within the ES.

15.24 The following additional criteria has also been used to define the list of Cumulative Projects:

- Applications dating from January 2020 onwards. It is anticipated that applications prior to this date will already have been built out (and therefore form part of the baseline) and / or where subsequent applications have been submitted these would be captured within the search dates;
- Applications that have been submitted, consented/granted planning permission, or part implemented;
- Applications that have been refused but are subject to an undetermined appeal;
- Projects of a pertinent scale, which has been determined using professional judgment but informed by their scale<sup>186</sup>, perceived impact, or complexity, and are present near the Site.

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<sup>180</sup> Comment or search on a planning application | Chichester District Council

<sup>181</sup> Landstack is an interactive mapping tool that displays all planning applications submitted to local planning authorities and automatically updates on a weekly basis.

<sup>182</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/register-of-applications/>.

<sup>183</sup> <https://www.gov.uk/government/collections/twa-inspector-reports-and-decision-letters>.

<sup>184</sup> <https://www.parliament.uk/business/bills-and-legislation/current-bills/hybrid-bills/>.

<sup>185</sup> <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

<sup>186</sup> Scale has been based on a judgement, but in part informed by the definition of a major developed within NPPF; the definitions of Schedule 1 and 2 developments within the EIA Regulations; and other developments that do not fall into the above, but could have perceived notable effects.

- 15.25 A further search will be undertaken 12 weeks prior to the finalisation of the assessment of cumulative assessment as part of the ES. This is to ensure there is sufficient time for them to be considered and incorporated within any studies / evaluation / modelling that may underpin the assessments within the ES (e.g. visualisations).
- 15.26 The resulting Cumulative Projects that will be considered and appraised in the assessment of cumulative effects using the methodology and criteria set out above is provided within **Table 15.1** and shown on **Figure 15.1**.

**Table 15.1: Cumulative Projects for Assessment of In-combination Effects**

| ID | Planning Reference                | Name, Address                                                                                                                               | Description                                                                                                                                                                                                                                                 | Distance and direction from Site | EIA Development? | Status                          |
|----|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------|---------------------------------|
| 1  | DC/23/2103                        | New Rural Business Park at Hilland Farm, Billingshurst<br><br>Hilland Farm Hilland Road<br>Billingshurst West Sussex<br>RH14 9HN            | Erection of Business Park following demolition of existing redundant farm buildings                                                                                                                                                                         | Adjacent to the east             | No               | Application Permitted           |
| 2  | DC/24/0749<br>Appeal ref: 3361285 | Land at Hilland House, New Road, Billingshurst<br><br>Hilland House New Road<br>Billingshurst West Sussex                                   | Outline Application for redevelopment of the site to provide up to 125 dwellings, ancillary parking new landscaping and open space, an ecological and woodland park together with associated works and landscaping with all matters reserved except access. | Adjacent to the east             | No               | Application Permitted on Appeal |
| 3  | DC/22/0518                        | Land at Platts Roundabout, Newbridge Road, Billingshurst<br><br>Land Parcel at 507911<br>125837 Newbridge Road<br>Billingshurst West Sussex | Outline Application for redevelopment of the site to provide flexible employment space (Use Classes E(g)(ii) and (iii), B2 and B8) totalling 4,627sqm, ancillary parking and circulation space with all matters reserved except access and layout           | Adjacent to the Site             | No               | Application Permitted           |
| 4  | DC/25/1910                        | Land at Hilland Farm, Billingshurst                                                                                                         | Outline planning permission for up to 125no. homes and associated                                                                                                                                                                                           | 100m to the east                 | No               | Pending Approval                |

| ID | Planning Reference | Name, Address                                                                                                                       | Description                                                                                                                                                                                                                                                                                     | Distance and direction from Site | EIA Development? | Status                |
|----|--------------------|-------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------|-----------------------|
|    |                    | Land East of Billingshurst Business Park (Phase 2)<br>Stane Street Billingshurst<br>West Sussex RH14 9HN                            | infrastructure/green space with all matters reserved apart from access.                                                                                                                                                                                                                         |                                  |                  |                       |
| 5  | DC/25/1697         | Billingshurst Business Park<br><br>Billingshurst Business Park (Phase 2 & 3), Stane Street, Billingshurst                           | Hybrid application comprising: Mixed use development, including detailed permission for means of access and 1,338 sqm business floorspace with the remainder of the development in outline, comprising up to 102no. homes and up to 5,605 sqm of business floorspace (Classes E g (iii)/B2/B8). | 100m to the east                 | No               | Pending Approval      |
| 6  | DC/25/0458         | Land to the South of Billingshurst Business Park<br><br>Land At 509354 126590<br>Hilland Road Billingshurst<br>West Sussex RH14 9HN | Workshop, storage building with associated vehicular parking, yard area and access.                                                                                                                                                                                                             | 30m east                         | No               | Application Permitted |
| 7  | DC/24/1581         | Land to the north of Marringdean Road, Billingshurst                                                                                | Outline planning application for up to 79 Dwellings (including affordable homes) with all matters reserved except for access.                                                                                                                                                                   | 700m east                        | No               | Application Permitted |

| ID | Planning Reference | Name, Address                                                                                                                                                                           | Description                                                                                                                                                                      | Distance and direction from Site | EIA Development? | Status                |
|----|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|------------------|-----------------------|
|    |                    | Land at 508967 124469<br>Marringdean Road<br>Billingshurst West Sussex                                                                                                                  |                                                                                                                                                                                  |                                  |                  |                       |
| 8  | 25/00658/FUL       | Wisborough Solar Farm<br><br>Land To The South, South West And North West Of Malham Farm And North West Of Oakwood Farm<br>Newpound Wisborough Green Billingshurst West Sussex RH14 0AP | Proposed construction, operation and decommissioning of a solar farm and associated infrastructure.                                                                              | 1.8km to the north west          | No               | Pending Approval      |
| 9  | DC/17/0177         | Brinsbury Fields, Brinsbury Campus<br><br>Brinsbury Fields Brinsbury College Pulborough                                                                                                 | Outline planning permission (with all matters reserved except for access from Stane Street (A29)) for up to 6 commercial buildings comprising a mix of B1, B2 and B8 Use Classes | 2.3km to the south               | No               | Application Permitted |

***Step 2: Assessment of In-combination Effects***

- 15.27 The assessment of in-combination effects will take into consideration available documentation submitted in support of the application for the above Cumulative Projects, to conclude if common receptors are present between the Proposed Development and the Cumulative Projects and the extent of any in-combination effect. Where suitable information is not available, either professional judgement will be used to determine the cumulative effects or limitations will be set out.
- 15.28 The in-combination assessment will focus on the technical topic / effects 'scoped in' (i.e., reported within the ES).
- 15.29 The evaluation at the receptor level will consider the following:
- Magnitude of change (or impact) in the relevant technical assessments;
  - Sensitivity (or value, importance, etc.) of the receptor / receiving environment to change; and / or
  - Duration and reversibility of effect.
- 15.30 Through a combination of the qualitative evaluation and mitigation presented in the EIA, conclusions will be drawn as to the likelihood for significant in-combination environmental effects and conclusions will be made in terms of:
- How the in-combination effect is different to the project level effect.
  - Is there an increase or decrease in the in-combination effects when compared against the project level effect.
  - Is the in-combination effect significant and does the Proposed Development create the 'tipping point'?

## 16. Summary of EIA Scoping Report

16.1 **Chapter** Technical Topics which are Not Significant<sup>5</sup> identified a number of technical topics for which no likely or significant effects have been identified and are proposed to be 'scoped out' of the EIA and not reported in the ES, based on the technical evidence base provided. These are as follows:

- Agricultural Land and Soil Resources;
- Ground Conditions and Contamination;
- Lighting;
- Major Accidents and/or Disasters;
- Minerals; and
- Waste.

16.2 The technical topics proposed to be 'scoped in' (see **Technical Chapters 6 – 14**) are as follows:

- Transport and Access;
- Air Quality and Odour;
- Noise and Vibration;
- Biodiversity;
- Landscape and Visual;
- Archaeology and Built Heritage;
- Water Environment;
- Socio-economics and Human Health; and
- Climate Change.

16.3 **Table 16.1** provides a summary of all the technical topics and effects considered unlikely to be significant and therefore 'scoped out' as well as the topics and likely significant environmental effects 'scoped in' that will be considered further within the EIA and reported in the ES.

**Table 16.1: Summary of Likely Significant and Not Significant Effects**

| Technical Topic Area                 | Effects which are Not Significant                                                                                                               | Likely Significant Environmental Effects |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
| Agricultural Land and Soil Resources | Loss of Agricultural Land                                                                                                                       | -                                        |
|                                      | Loss of Soils or Reduction in Soil Quality                                                                                                      |                                          |
|                                      | Reduction in farmable area and business viability                                                                                               |                                          |
| Ground Conditions and Contamination  | Risk to human health from existing on-site soil contamination during operation                                                                  | -                                        |
|                                      | Risk to human health and on-site surface watercourse from existing on-site and construction related soil contamination during construction      |                                          |
|                                      | Risk to human health from ground gas generation during construction and operation                                                               |                                          |
|                                      | Natural ground stability hazards during operation                                                                                               |                                          |
|                                      | Unexploded ordnance (UXO) risks during construction and operation                                                                               |                                          |
|                                      | Cut and fill soil movements, stockpiling and dewatering during construction                                                                     |                                          |
| Lighting                             | Light Spillage from Construction Compound Lighting on Existing or Future Sensitive Human Receptors                                              | -                                        |
|                                      | Light Spillage from Street Lighting, Retail Lighting, Retail Illuminations and Sports Pitch Lighting on existing and future sensitive receptors |                                          |

| Technical Topic Area             | Effects which are Not Significant                                                         | Likely Significant Environmental Effects |
|----------------------------------|-------------------------------------------------------------------------------------------|------------------------------------------|
|                                  | Development Lighting on South Downs National Park<br>International Dark Night Sky Reserve |                                          |
| Major Accidents and/or Disasters | Major accidents associated with nearby COMAH sites                                        | -                                        |
|                                  | Major accidents associated with underground utilities                                     |                                          |
|                                  | Major accidents associated with utility diversions                                        |                                          |
|                                  | Major accidents associated with overhead powerlines                                       |                                          |
|                                  | Major accidents caused by ground subsidence and associated structural / building collapse |                                          |
|                                  | Major accidents associated with fire                                                      |                                          |
|                                  | Major flood event caused by an extreme weather event or failure of infrastructure         |                                          |
|                                  | Major accidents on the local road network                                                 |                                          |
|                                  | Major accidents associated with risk of UXO on-site                                       |                                          |
|                                  | Major accidents as a result of malicious attacks (e.g. vandalism, arson or terrorism)     |                                          |
|                                  | Major accidents during construction works                                                 |                                          |
|                                  | Major accidents associated with employment during operation                               |                                          |
| Minerals                         | Sterilisation of mineral resources                                                        | -                                        |
| Waste                            | Increase in Waste Management Demand during Construction                                   | -                                        |

| Technical Topic Area  | Effects which are Not Significant                                                                                                                                             | Likely Significant Environmental Effects                                       |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
|                       | Increase in Waste Management Demand during Operation                                                                                                                          |                                                                                |
| Transport and Access  | Construction Traffic                                                                                                                                                          | Severance                                                                      |
|                       | Hazardous or Large Loads                                                                                                                                                      | Driver Delay                                                                   |
|                       |                                                                                                                                                                               | Pedestrian Delay                                                               |
|                       |                                                                                                                                                                               | Non-Motorised User Amenity                                                     |
|                       |                                                                                                                                                                               | Fear and Intimidation                                                          |
|                       |                                                                                                                                                                               | Road Safety                                                                    |
| Air Quality and Odour | Existing Air Quality and Odour on Proposed Sensitive Uses                                                                                                                     | Changes in Air Quality associated with Development Related Operational Traffic |
|                       | Changes in Air Quality as a result of Development Related Operational or Construction Traffic on Existing Ecological Receptors                                                |                                                                                |
|                       | Changes in Air Quality as a result of Development Related Operational and Construction Transport on Proposed Sensitive Uses                                                   |                                                                                |
|                       | Changes in Air Quality from Emissions associated with Operational Equipment (such as Boiler Emissions) on both Existing and Proposed Sensitive Human and Ecological Receptors |                                                                                |
|                       | Changes in Air Quality from Development Related Construction Traffic on Existing Sensitive Human Receptors                                                                    |                                                                                |

| Technical Topic Area | Effects which are Not Significant                                                                                                                                                                                                                                                                                                                                                                 | Likely Significant Environmental Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | Dust and Emissions from Construction Activities                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Noise and Vibration  | Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Existing Human Receptors                                                                                                                                                                                                                                                                    | Noise from Operational Traffic                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                      | Noise from Operational Use of the School, Community Hub, Sports Facilities and Commercial Elements on Future Human Receptors                                                                                                                                                                                                                                                                      | Existing Noise (all sources)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                      | Vibration from existing, or Development Related Operational or Construction Piling and Traffic, Use of the Sports Facilities and Commercial Elements on Existing or Future Sensitive Human Receptors                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                      | Noise & Vibration Effects of Construction Activities                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Biodiversity         | Disturbance/ degradation of habitats: <ul style="list-style-type: none"> <li>• Loss of habitats</li> <li>• Loss of water vole and otter habitat</li> <li>• Loss of roosting bat habitat</li> <li>• Loss of hazel dormouse nests and supporting habitat</li> <li>• Loss of GCN habitat</li> <li>• Loss of reptile habitat and disturbance to reptiles</li> <li>• Loss of badger habitat</li> </ul> | Disturbance to wildlife (noise, light, human activity), air pollution, water pollution, hydrological changes, introduction of invasive species, and loss of land functionality during construction on the Upper Arun SSSI.<br><br>Increased recreational activity, nutrient loading, and loss of functionally linked habitats affecting water quality and ecological integrity, introduction of invasive species during operation on the Upper Arun SSSI.<br><br>Disturbance to wildlife (noise, light, human activity), water pollution, hydrological changes, introduction of invasive species, and loss of land functionality during construction on the Mens SAC and the Ebernoe Common SAC. |

| Technical Topic Area | Effects which are Not Significant                                                                                                                                                                                                                                                | Likely Significant Environmental Effects                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |                                                                                                                                                                                                                                                                                  | <p>Potential indirect impacts including increased recreational pressure, habitat fragmentation, and disturbance to bat commuting/foraging corridors during operation on the Mens SAC.</p> <hr/> <p>Indirect impacts such as increased recreational pressure, land use change nearby, and fragmentation of bat habitat and commuting routes during operation on the Ebernoe Common SAC.</p> <hr/> <p>Habitat loss/fragmentation, disturbance, killing/injury during construction on foraging and commuting bats.</p> <hr/> <p>Habitat loss/fragmentation, disturbance, killing/injury during operation on foraging and commuting bats.</p> <hr/> <p>Habitat loss/fragmentation, disturbance, killing/injury during construction on protected and priority species: breeding and wintering birds.</p> <hr/> <p>Habitat loss and supporting habitats not being appropriately managed during operation on protected and priority species: breeding and wintering birds.</p> <hr/> |
| Landscape and Visual | Changes to character and the setting of the national landscape; Changes to views out from the national landscape; Changes to night-time views from the national landscape [South Downs National Park, visual receptors within the national park, including recreational walkers] | Changes to Site character / features                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Technical Topic Area           | Effects which are Not Significant                                                                                                   | Likely Significant Environmental Effects                                                             |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
|                                | Changes in views and visual amenity [all visual receptors beyond 1km from the Site boundary]                                        | Changes to landscape character                                                                       |
|                                | Changes in landscape character [LCA beyond 1km from the Site, including LW2 North Western Low Weald]                                | Changes to Billingshurst townscape<br>Changes to local views and visual amenity                      |
| Archaeology and Built Heritage | Direct impact or change to designated heritage assets                                                                               | Impact on heritage significance arising through change to setting                                    |
|                                | Direct impact or change to heritage assets outside of the Site boundary                                                             | Impact on heritage significance arising through direct disturbance to non-designated heritage assets |
|                                | Direct impact or change to heritage assets during the operational stage                                                             |                                                                                                      |
|                                | Change to setting of heritage assets during the construction stage                                                                  |                                                                                                      |
|                                | Change to setting of the Grade II Listed New Bridge (1227432) approximately 15m west of the Site boundary                           |                                                                                                      |
|                                | Effects arising through change to setting of the Grade II Listed Summers Place (1261218) located 240m to the north-east of the Site |                                                                                                      |
|                                | Effects arising through change to setting of other listed buildings not listed in Table 11.1                                        |                                                                                                      |
|                                | Effects arising through change to setting of Billingshurst Conservation Area                                                        |                                                                                                      |

| Technical Topic Area             | Effects which are Not Significant                                                                                                                            | Likely Significant Environmental Effects        |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Water Environment                | Decrease in water quality as a result of runoff during construction activities                                                                               | Decrease in water quality as a result of runoff |
|                                  | Increase in flood risk on- and of-Site as a result of runoff during construction activities                                                                  |                                                 |
|                                  | Increase in surface water flood risk as a result of increased overland flows from changes to topography and increased areas of hardstanding during operation |                                                 |
|                                  | Risk of flooding from fluvial sources on future Site users                                                                                                   |                                                 |
|                                  | Increase in flood risk from groundwater during operation                                                                                                     |                                                 |
|                                  | Increased demand on existing drainage networks and Wastewater Treatment Works                                                                                |                                                 |
|                                  | Increased demand on potable water use during construction and operation                                                                                      |                                                 |
|                                  | Increase in surface water flood risk as a result of realigning watercourses                                                                                  |                                                 |
| Socio-economics and Human Health | Social cohesion, inclusive design and access to community facilities during operation                                                                        | Employment generated during construction        |
|                                  | Crime reduction and community safety during operation                                                                                                        | Provision of new housing                        |
|                                  | Access to healthy food during operation                                                                                                                      | Access to secondary education facilities        |

| Technical Topic Area | Effects which are Not Significant                                                                                                             | Likely Significant Environmental Effects        |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
|                      | Access to early years, primary education and special educational needs (SEN) facilities                                                       | Access to primary healthcare facilities (GP)s   |
|                      | Access to open space and sports and recreation facilities                                                                                     |                                                 |
|                      | Access to training opportunities                                                                                                              |                                                 |
|                      | Access to active travel and sustainable transport options                                                                                     |                                                 |
| Climate Change       | Increasing summer temperatures affecting human health during construction                                                                     | GHG Emissions during construction and operation |
|                      | Changing annual temperatures / rainfall patterns and changes to air quality during construction, water supply, flood risk during construction |                                                 |
|                      | Changes to future climate including temperature and rainfall and risk to building infrastructure and future occupants during operation        |                                                 |
|                      | Changes to annual rainfall impacting operational water demand                                                                                 |                                                 |
|                      | Changes to annual rainfall increasing flood risk                                                                                              |                                                 |
|                      | Changes to future climate and resilience of site habitats and species during operation                                                        |                                                 |
|                      | Higher summer temperatures and risk of building overheating during operation                                                                  |                                                 |



## Appendix 1.1: Record of Consultation

| Body / Organisation                                 | Date / Form of Consultation      | Summary of Consultation Outputs                                                                                                                                                                                   |
|-----------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Ground Conditions and Contamination</b>          |                                  |                                                                                                                                                                                                                   |
| HDC                                                 | 26 February 2025, search request | Search results confirmed that a Contaminated Land Notice has not been issued for the Site and no consultations have been undertaken with regard to the Environmental Protection Act 1990 in relation to the Site. |
| <b>Lighting / Air Quality / Noise and Vibration</b> |                                  |                                                                                                                                                                                                                   |
| HDC – Environmental Protection & Pollution Team     | 14 January 2026                  | Request for scoping meeting. No response to date.                                                                                                                                                                 |
| <b>Transport and Access</b>                         |                                  |                                                                                                                                                                                                                   |
| West Sussex County Council (WSCC)                   | September 2023                   | Technical Note setting out proposed vehicular access strategy and associated capacity assessment of proposed access junctions.                                                                                    |
|                                                     | October 2023                     | Virtual meeting to discuss proposed vehicular access strategy and associated capacity assessment of proposed access junctions.                                                                                    |
|                                                     | December 2023                    | Technical Notes in response of vehicular access and accessibility / active travel.                                                                                                                                |
|                                                     | May 2024                         | Technical Note setting out vehicle trip generation forecasts and capacity assessment of the northern parcel access.                                                                                               |
|                                                     | June 2024                        | Virtual meeting to discuss vehicular trip generation and capacity assessment of the northern parcel access.                                                                                                       |
|                                                     | June 2024                        | Technical Notes covering a Stage 1 Road Safety Audit of the proposed northern parcel access junction.                                                                                                             |
|                                                     | August 2024                      | Technical Note updating the capacity assessment of the proposed northern parcel vehicular access.                                                                                                                 |
|                                                     | August 2024                      | Virtual meeting to discuss the design of the northern parcel access junction.                                                                                                                                     |
|                                                     | September 2024                   | Amended design of the northern parcel vehicular access.                                                                                                                                                           |

| Body / Organisation         | Date / Form of Consultation                  | Summary of Consultation Outputs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | July 2025                                    | Technical Note updating the capacity assessment of the proposed northern parcel vehicular access.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| HDC                         | June 2025                                    | Technical Note setting out the transport inputs to the pre-application enquiry.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Landscape and Visual</b> |                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| HDC                         | 15 December 2025, Email                      | <p>Consultation response on 12 January 2026 by Inês Watson, Specialists Team Leader (Landscape Architect) in HDC.</p> <p>LVIA viewpoints – several locations added as a result of the consultation.</p> <p>Key receptors to be scoped in or out – SDNP scoped out conditionally (photographs requested to rule it out formally).</p> <p>Proposed LVIA study area – generally agreed with small adjustments up to 1.5 km in areas covered by ZTV.</p> <p>Key documents to reference in the landscape and visual baseline – LCA studies agreed with some additional contextual info to be taken account of.</p> |
| <b>Water Environment</b>    |                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Environment Agency          | 10 November 2025, Email                      | Flood modelling data for the Site obtained to inform the EIA Scoping process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Southern Water              | 19 December 2025<br>Pre-development enquiry. | Asset Maps obtained. Request for connection location and confirm capacity for the Site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

## Appendix 2.1: Preliminary Environmental Management Plan

Project specific measures to avoid and/or prevent significant adverse environmental effects (i.e. mitigation measures) have been considered through EIA scoping when appraising likely environmental effects.

At this stage, this has focused on 'primary mitigation' (i.e. inherent mitigation, comprising fundamental aspects of the project design) and 'tertiary mitigation' (i.e. standard environmental commitments/practices).

In order to support HDC and other stakeholders, the mitigation measures that have been identified at this stage have been collated into a single schedule of mitigation (referred to as the Preliminary Environmental Management Plan) set out below. This will be developed further as part of the ES.

It is envisaged that mitigation will be secured through suitably worded planning conditions or another mechanism, where appropriate, and the Preliminary Environmental Management Plan will be utilised by the Applicant and appointed contractor(s) to control mitigation commitments and assurance over their implementation.

| Mitigation Measure             | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Primary Mitigation</b>      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Building Heights               | Built development will be up to 3 storeys and 11m from finished floor levels to ridge height within Built Development Areas (max of 15m including ground changes).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Vehicular Access               | <p>Three new accesses will provide access / egress into the Site:</p> <ul style="list-style-type: none"> <li>Northern Parcel Access – Involves the adaptation of the existing A29 / New Road / Hilland Farm 4-arm roundabout to provide a 5<sup>th</sup> arm on its western side serving the Proposed Development.</li> <li>Southern Parcels Access – A new roundabout junction on the A272 to serve the two parcels to the south of the Proposed Development.</li> <li>Care Village Access – The provision of a simple priority junction on Newbridge Road. Vehicles would then access wider network via the existing Newbridge Road / A29 priority junction.</li> </ul> <p>These junctions will connect to the internal road network of secondary and tertiary roads that will lead to the proposed uses and will provide access for cars / vans, emergency vehicles, service and refuse vehicles. The current access off the A272 that serves the Billingshurst Recycle Centre and Jubilee Sports Pavilion will be retained on its current alignment.</p> <p>Car parking will be provided as part of the Proposed Development in line with HDC and WSDC guidance.</p> |
| Pedestrian / Cycle Connections | The Proposed Development will incorporate new pedestrian and cycle access routes that will provide both access between development parcels as well as wider connectivity across the A272 to local amenities including the local centre and the railway station. It is envisaged that all three PRowS's that cross the Site will be retained on their current alignment as part of the Proposed Development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Overhead Power Lines Stand-off | The existing 400kV overhead electricity powerline (OHL) will be retained on its current south east to north west trajectory with statutory stand-off distances to built development implemented (60m total – 30m each side) to ensure appropriate ongoing operational maintenance. Other non-structural development may, however, occur within this area such as SuDS, internal roads, green infrastructure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Mitigation Measure                                          | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Operational Flood Risk Strategy and Surface Drainage System | <p>The Proposed Development will be developed to ensure all infrastructure classified as 'more vulnerable' will be located outside of areas highlighted as being in a Flood Zone 2 or 3 as defined on the EA flood maps<sup>187</sup>.</p> <p>The Proposed Development will include SuDS features which will manage surface water and be designed to manage run off to greenfield rates (including appropriate allowances for climate change) and not increase flood risk off-site. Based on existing geology it is likely infiltration measures will be feasible across Site, albeit this will be confirmed through further investigation.</p> <p>The new surface water design will manage and direct runoff to suitable discharge points, and include areas of attenuation to store excess flows during times of heightened rainfall. These mitigation measures will form the surface water design. The surface water strategy will look to incorporate site appropriate SuDS to match the existing flow of surface water, so far as is possible. If required, multiple discharge locations will be used to ensure the receiving water bodies are not disproportionately affected by change in flows during the operational stage of the Site. An allowance of 45% will be added to the 1 in 30 year, and 1 in 100 year storms.</p> |
| Landscaping                                                 | <p>Landscape measures will include a Country Park located in the north-western part of the Site which will incorporate a range of biodiversity enhancements, such as Sustainable Drainage Systems (SuDS), wetland habitats, wildflower meadows and woodland planting.</p> <p>Across the remainder of the Site, the Proposed Development will retain and enhance existing high-value ecological habitats, alongside the provision of public open space (POS), play areas, and additional hedgerow, tree, and woodland planting.</p> <p>Consideration in the design of landscaping will be given to the England Biodiversity Strategy<sup>188</sup> and Natural England Climate Change Adaptation Manual<sup>189</sup>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Potable Water                                               | <p>Water saving measures built into the design of the Proposed Development, such as water saving fixtures and fittings to reduce water consumption. Specific targets for residential and non-residential development include:</p> <ul style="list-style-type: none"> <li>• Targeting water consumption rate of 110litres per person per day for residential; and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

<sup>187</sup> EA Flood Risk Mapping. Available at <https://flood-map-for-planning.service.gov.uk/> (accessed on 20<sup>th</sup> November 2025)

<sup>188</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

<sup>189</sup> <http://publications.naturalengland.org.uk/publication/5679197848862720>

| Mitigation Measure                                | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                   | <ul style="list-style-type: none"> <li>Targeting the equivalent of two BREEAM Wat01, Water Efficiency credits for non-residential development at a minimum.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Operational Lighting                              | New lighting will be installed at the Site accesses, along internal routes, within parking and servicing areas associated with the commercial use, and around pedestrian pathways where required. Sports pitch provision will also include floodlighting, that will include the replacement of the exiting floodlights and erection of new floodlights associated with the new Billingshurst 1 <sup>st</sup> team football pitch that will be subject to operational standards / requirements and final specifications.                                                                                                                                                                                                                                                                                                                      |
| Operational Waste Storage                         | <p>An Operational Waste Management Plan (OWMP) will be implemented. The OWMP would set out outline measures for waste storage, collection, recycling and reuse and disposal in compliance with the required standards, set out in the HDC Household Waste Collection Policy<sup>190</sup> and the relevant Local Plan policies of HDC and WSCC as the local collection and disposal authorities.</p> <p>The Proposed Development will include appropriate facilities for the storage, handling and collection of these waste types.</p>                                                                                                                                                                                                                                                                                                      |
| Operational Noise Limits                          | Proposed internal roads and fixed plant will be located at least 10m from proposed dwellings to avoid noise disturbance effects.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Tertiary Mitigation</b>                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Construction Environmental Management Plan (CEMP) | <p>A CEMP will be prepared by the appointed contractor(s) in advance of commencing construction works. This document will provide detailed measures / controls to avoid and effectively manage potential adverse effects on the environment. This will be submitted to HDC for approval.</p> <p><u>General measures</u></p> <p>UK legislation and guidance issued by the HSE will be adhered to, thereby ensuring the safety of the on-site workforce. A CEMP should include measures in line with all relevant legislation, government and industry standards, codes of practice and best practice measures, inclusive of, but not limited to:</p> <p><u>General</u></p> <ul style="list-style-type: none"> <li>Temporary fencing and hoarding will be erected around the perimeter of each development area under construction;</li> </ul> |

<sup>190</sup> Horsham District Council (2025) Household Waste Collection Policy. Available at: <https://www.horsham.gov.uk/waste-recycling-and-bins/household-waste-collection-policy#1> [Accessed 11/12/2025]

| Mitigation Measure | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | <ul style="list-style-type: none"> <li>• Temporary secure access gates will be provided to manage the movement of vehicles, plant, equipment and personnel required;</li> <li>• As a worst-case assumption, PRowS may be temporarily closed or diverted during construction, until a time where they are permanently re-opened. If continued use is deemed appropriate during construction, routes will be protected by fencing/ hoarding to allow for safe continued access;</li> <li>• All construction works will be undertaken in line with the requirements set out in the Construction (Design and Management) Regulations 2015<sup>191</sup> and appropriate levels of security (e.g. personnel / CCTV) will be provided;</li> <li>• Any on-site excavation work will be informed by the results of the intrusive investigation work and any risks will be addressed under the Health and Safety at Work Act, 1974<sup>192</sup>. All reports from this Site will be available to the Applicant through the Health &amp; Safety File.</li> </ul> <p><u>Site working hours / days</u></p> <ul style="list-style-type: none"> <li>• Construction working hours would be 08:00 to 18:00 Mondays to Fridays; 09:00 to 13:00 on Saturday; and it is anticipated that there will be no construction on Sundays or Bank Holidays. Some quiet works may be undertaken outside of these hours if agreed with HDC.</li> </ul> <p><u>Light pollution management</u></p> <ul style="list-style-type: none"> <li>• Any construction compound lighting required will be temporary and utilised in the winter only (where light levels are not safe to undertake work safely) and will be controlled and designed to achieve minimum spillage beyond the boundary of any site compounds (which will be located variously as the scheme build progresses, but will all be within the boundary of the Site);</li> <li>• Best practice measures will be implemented in line with ILPGN01/21<sup>193</sup>, specifically this will be the requirement for compound lighting to be designed to achieve the E3 post curfew maximum illuminance criteria of 2lux<sup>194</sup> at nearby vertical receptors.</li> </ul> |

<sup>191</sup> Construction (Design and Management) Regulations 2015.

<sup>192</sup> Health and Safety at Work etc. Act 1974. Available at: <https://www.legislation.gov.uk/ukpga/1974/37>

<sup>193</sup> ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01/21).

<sup>194</sup> Table 3- ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01/21).

| Mitigation Measure | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | <p><u>Contamination management</u></p> <ul style="list-style-type: none"> <li>Planning conditions will require an investigation and assessment process that follows the EA Land Contamination Risk Management (LCRM) guidance<sup>195</sup>. The planning conditions of the Application will include the intrusive investigation and assessment of the potential contamination source areas, identification of any unacceptable risks, a remediation strategy to address the unacceptable risks and verification to confirm the effective implementation of the remediation strategy;</li> <li>Exposure to the potential forms of existing localised contamination that may be present on-site, will be effectively controlled as part of the CEMP with measures such as dust suppression, good hygiene and PPE, in line with the Health and Safety at Work etc. Act 1974<sup>196</sup> and Control of Substances Hazardous to Health (COSHH) Regulations 2002<sup>197</sup>. The CEMP will also include pollution prevention control measures, in accordance with PPG6<sup>198</sup>, to prevent pollution from construction activities;</li> <li>Exposure to ground gas, if present, will be effectively remediated with measures such as source removal and gas protection measures, in line with BS 8485 2015<sup>199</sup>, in buildings and other enclosed spaces, under the planning conditions, and the control of access to confined spaces and excavations during construction.</li> </ul> <p><u>Waste management</u></p> <ul style="list-style-type: none"> <li>Waste will be managed through the production of an outline Site Waste Management Plan (SWMP);</li> <li>The SWMP would identify the anticipated CD&amp;E waste arisings associated with the construction stage and present a management strategy in line with the waste hierarchy.</li> </ul> <p><u>Utilities</u></p> <ul style="list-style-type: none"> <li>Any required diversions of utilities during construction will be undertaken by the relevant Distribution Network Operator (DNO) (or a third party contractor appointed by the DNO);</li> </ul> |

<sup>195</sup> Environment Agency's Land Contamination Risk Management (LCRM) guidance. Available at: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

<sup>196</sup> Health and Safety at Work etc. Act 1974

<sup>197</sup> COSHH (Control of Substances Hazardous to Health) Regulations 2002

<sup>198</sup> Environment Agency (2012). Working at construction and demolition sites: PPG6 Pollution Prevention Guidelines

<sup>199</sup> BS 8485:2015+A1:2019. Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings. British Standards Institution (BSI), Published June 2015, amended January 2019.

| Mitigation Measure | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    | <ul style="list-style-type: none"> <li>Works will be undertaken in accordance with GS6 Avoiding danger from overhead lines<sup>200</sup> and ensuring construction workers are briefed on the appropriate methods of working and the easements.</li> </ul> <p><u>Surface water management</u></p> <ul style="list-style-type: none"> <li>Temporary surface water drainage will be installed and maintained to mitigate flood risk and sediment loading in line with practice guidance such as CIRIA's Control of water pollution from construction sites<sup>201</sup>.</li> <li>As part of the proposed groundworks, the requirement for pumping of excavations or dewatering may arise. Pumped waters will be disposed of in a controlled manner to public sewer (with appropriate Southern Water consent), following primary treatment, such as the removal of large solids, oils and grease from wastewater, where necessary.</li> <li>All existing surface water drains will be provided with appropriate and suitable siltation traps. All siltation traps shall be inspected and maintained on a regular basis.</li> </ul> <p><u>Construction fire safety</u></p> <ul style="list-style-type: none"> <li>Construction works will be undertaken in line with Fire Prevention on Construction Sites: Joint Code of Practice<sup>202</sup>.</li> </ul> <p><u>Traffic management</u></p> <ul style="list-style-type: none"> <li>Transport movements will be in accordance with a construction logistics / traffic management plan.</li> </ul> <p><u>Air quality and dust management</u></p> <ul style="list-style-type: none"> <li>Dust and particulate matter emission produced during construction activities (from both mobile and immobile machinery) will be controlled through the implementation of prevention measures, such as screening stockpiles of materials, deployment of windbreak netting and dampening exposed soils as appropriate, informed by the Institute of Air Quality Management<sup>203</sup> (IAQM) guidance;</li> <li>There will be requirements for ongoing monitoring and liaison with the local community, and HDC;</li> </ul> |

<sup>200</sup> HSE (2013) GS6 Avoiding danger from overhead lines.

<sup>201</sup> CIRIA (2001) Control of water pollution from construction sites. Guidance for consultants and contractors (C532).

<sup>202</sup> RISC Authority and The Fire Protection Association (2022) Fire Prevention on Construction Sites: The Joint Code of Practice on the Protection from Fire of Construction Sites and Buildings Undergoing Renovation (10th Edition).

<sup>203</sup> Institute of Air Quality Management (2024). Guidance on the Assessment of Dust from Demolition and Construction. Available at: Construction-Dust-Guidance-Jan-2024.pdf [Accessed: 17/04/2025].

| Mitigation Measure                          | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                             | <ul style="list-style-type: none"> <li>Controls will be placed on construction traffic, such as wheel washing, no idling and routing.</li> </ul> <p><u>UXO management</u></p> <ul style="list-style-type: none"> <li>The Detailed UXO Risk Assessment recommends a safety awareness briefing and a Site-Specific Emergency Response Plan;</li> <li>There will be communication to all construction workers on UXO risks, safety training by a competent expert and the attendance of UXO supervisors during the groundworks (if appropriate).</li> </ul>                                                                                                  |
| Earthworks/ Foundation Design               | <p>Appropriate soil handling measures will be applied throughout construction that will be controlled by a Soil Management Plan (SMP).</p> <p>All earthworks and foundation design will be in accordance with relevant industry guidance, including but not limited to:</p> <ul style="list-style-type: none"> <li>CIRIA: treated ground engineering properties and performance (C572);</li> <li>BRE document FB75: building on fill – geotechnical aspects;</li> <li>British Standard 6031:2009: code of practice for earthworks; and</li> <li>Building Regulations Approved Document A – Structure.</li> </ul>                                          |
| Operational Surface Water Drainage Strategy | <p>The surface water drainage strategy will be developed to utilise relevant design guidance and code, in accordance with the requirements of the CIRIA SuDS Design guidance, the DEFRA Sustainable Drainage Systems Non-statutory technical standards, Design and Construction guidance (Codes for Adoption), Building Regulations Part H<sup>204</sup> and any requirements from the local adopting sewerage authority (Southern Water). It is anticipated that surface water will be managed using a Sustainable Drainage System (SuDS) management train before discharging into the existing on-site watercourses at a greenfield discharge rate.</p> |

<sup>204</sup> The SuDS Manual (C753F) CIRIA [https://www.ciria.org/CIRIA/CIRIA/Item\\_Detail.aspx?iProductCode=C753](https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C753)

DEFRA National Standards for Sustainable Drainage Systems (SuDS) <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

Sewer Sector Guidance, Version 2.2 <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

Drainage and Waste Disposal: Approved Document H; 2015 Edition [https://assets.publishing.service.gov.uk/media/5a80cf9ded915d74e33fc8ae/BR\\_PDF\\_AD\\_H\\_2015.pdf](https://assets.publishing.service.gov.uk/media/5a80cf9ded915d74e33fc8ae/BR_PDF_AD_H_2015.pdf)

| Mitigation Measure                 | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Operational Foul Drainage Strategy | Any necessary upgrades to existing foul drainage infrastructure, including the Wastewater Treatment Works, will be undertaken by Southern Water prior to the Proposed Development being operational.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Operational Lighting Strategy      | All lighting will be designed to achieve no more than 10 lux spillage (pre-curfew) <sup>205</sup> and 2 Lux spillage (post curfew), in accordance with GN01 <sup>206</sup> , at nearby existing or proposed facades of dwellings. All proposed lighting (including flood lighting) will be designed to achieve 0 (or 'near zero') upward light ratio.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Operational Fire Safety            | The final end-users / building management company will have in place the required emergency procedures / practices (i.e. apparatus / instruments (i.e. smoke detectors) required by law for commercial occupation. In addition, buildings will be designed with appropriate fire preventative measures (i.e. extinguishers etc.) and all external façades and materials will meet the necessary fire resistance standards set out within Building Regulations and by law.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Building Safety                    | <p>Site security arrangements during the construction stage will be in line with the requirements set out in the Construction (Design and Management) Regulations 2015<sup>207</sup>.</p> <p>The required emergency producers/practices (i.e. Fire Emergency Evacuation Plan (FEEP)) or apparatus/instruments (i.e. smoke detectors/sprinklers) required by law for the uses as part of the Proposed Development will be in place.</p> <p>The buildings will be designed, in line with Building Regulations Approved Document D: Fire Safety, with appropriate fire preventative measures (i.e. fire doors, extinguishers etc.) and all external façades and materials will meet the necessary fire resistance standards set out within Building Regulations and by law.</p> <p>The design of the Proposed Development will be informed by 'Secure by Design' principles and appropriate design and site management measures (including appropriate lighting and digital entry systems at each building) will be implemented to ensure that the potential for crime and anti-social behaviour is minimised.</p> |
| <b>Secondary Mitigation</b>        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

<sup>205</sup> Curfew is defined in ILPGN01/21 as 'The time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied the local planning department. Depending upon application curfew times often commence between 21:00 to 23:00 and may run until 07:00'.

<sup>206</sup> ILP Guidance Note 1 The Reduction of Obtrusive Light (ILPGN01/21).

<sup>207</sup> Secretary of State (2015) Construction (Design and Management) Regulations 2015.

| Mitigation Measure             | Description / Details of Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Noise modelling and mitigation | <p>to determine the noise mitigation measures required for the existing and proposed receptors to achieve either the BS8233 criteria for average noise levels, external <math>L_{Amax}</math> levels of 60 dB <math>L_{Amax(15\text{ minutes})}</math> or Noise Rating Levels of NR25 as appropriate, in general accordance with the guidance provided within PNAD21. Where appropriate noise levels at the proposed school will be referenced in accordance with the criteria outlined within the Department for Education Building Bulletin 93: Acoustic design of schools - performance standards.</p> <p>For the proposed plant at the school, community hub, sports facilities and commercial uses, noise limits will be set in order to achieve either the BS8233<sup>208</sup> criteria for average noise levels, external <math>L_{Amax}</math> levels of 60 dB <math>L_{Amax(15\text{ minutes})}</math> or Noise Rating Levels of NR25 as appropriate, in general accordance with the guidance provided within Horsham Council Planning Noise Advisory Document 2021 (PNAD21).</p> |

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<sup>208</sup> BS 8233:2014 - Guidance on sound insulation and noise reduction for buildings

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