



Quod

EIA Scoping Report

Kingswood

June 2026

Q240997

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1 Introduction

- 1.1 The purpose of this report is to inform a request for an Environmental Impact Assessment (EIA) Scoping Opinion from Horsham District Council ('HDC') in relation to emerging proposals for a residential-led development located at Land South of Adversane centred at National Grid Reference TQ 07799 22670 known as Kingswood. The Scoping Opinion is being sought on behalf of Our Place Sustainable Development Limited (the 'Applicant').
- 1.2 This document does not form or support a planning application for development. It provides supporting information to allow HDC to adopt an EIA Scoping Opinion in relation to emerging proposals for development which will be subject to a hybrid planning application to be submitted in due course.
- 1.3 The site ('Site') comprises approximately 172 hectares (ha) south east of the village of Adversane, approximately 2km south of Billingshurst. Figures 1.1 and 1.2 show the Site's location and the likely maximum extent.

The Applicant and Vision

- 1.4 The Applicant, Our Place Sustainable Development Ltd ('Our Place') is a UK-based landowner and master developer specialising in the delivery of mixed-use, sustainable communities, with an emphasis on placemaking, walkable neighbourhoods and responding to local character and context
- 1.5 The Applicant's vision for Kingswood is to create a healthy, walkable and sustainable small town that provides homes and jobs to people of all ages and backgrounds in the heart of West Sussex. It will be distinctive and steered by careful masterplanning and design.
- 1.6 Kingswood is proposed as a new mixed-use settlement designed to evolve into a distinct Sussex town, with an emphasis on integrating nature, wellbeing and economic activity within a comprehensive masterplanned framework. The proposals include the delivery of new homes supported by associated infrastructure, as well as provision for employment, skills development and job creation.

The Development Proposals

- 1.7 The proposals for Kingswood comprise a strategic mixed-use development at land south of Billingshurst, promoted as a new settlement designed to deliver approximately 3,200 new homes to meet housing needs alongside employment opportunities, community facilities and supporting infrastructure. The scheme is intended to be delivered on a phased basis, creating a sustainable and self-contained community with schools, local centres, green infrastructure and transport connections, thereby meeting identified housing and economic needs while reducing reliance on existing settlements for day-to-day services. The proposals are subsequently referred to as the 'Development'.
- 1.8 The proposals are being developed in consultation with HDC and other stakeholders and will also be subject to public consultation before a planning application is submitted.

- 1.9 The Applicant intends to submit a hybrid planning application which will be a single planning application which seeks a combination of:
- **Full planning permission ('detailed component')** for the first phase of the Development and associated access; and
 - **Outline planning permission ('outline component')** for the remaining elements, with some or all matters (typically scale, layout, appearance, access and landscaping) reserved for subsequent approval (reserved matters applications).
- 1.10 Figure 1.2 provides an indication of the anticipated likely extent of the planning application and the extent of the detailed and outline components. Brief descriptions of the Site and the proposed Development are provided within Chapters 2 and 3 respectively.

Purpose of this Report

- 1.11 The Applicant is voluntarily undertaking an EIA process, and an Environmental Statement (ES) will therefore accompany the planning application. EIA is a systematic process that identifies and assesses the environmental impacts of a development and ensures that a local planning authority, when deciding whether to grant planning permission, does so in the full knowledge of the likely significant effects on the environment. The EIA process is also used to inform the design by identifying measures to prevent, reduce or offset adverse environmental effects and enhance beneficial effects.
- 1.12 This report sets out the findings of a scoping study which represents the first stage of the EIA process. It accompanies a formal request for a Scoping Opinion submitted to HDC under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended²) ('EIA Regulations').
- 1.13 In line with the EIA Regulations, this report identifies the Site location, provides a brief description of the nature and purpose of the Development, and an explanation of the likely significant effects of the Development on the environment. The report also outlines the proposed content, approach and scope of the ES to be submitted with the planning application.
- 1.14 In line with the EIA Regulations, the ES will be 'based on' the Scoping Opinion to be adopted by HDC. The ES will be prepared by competent experts (see Project Team section for further details).

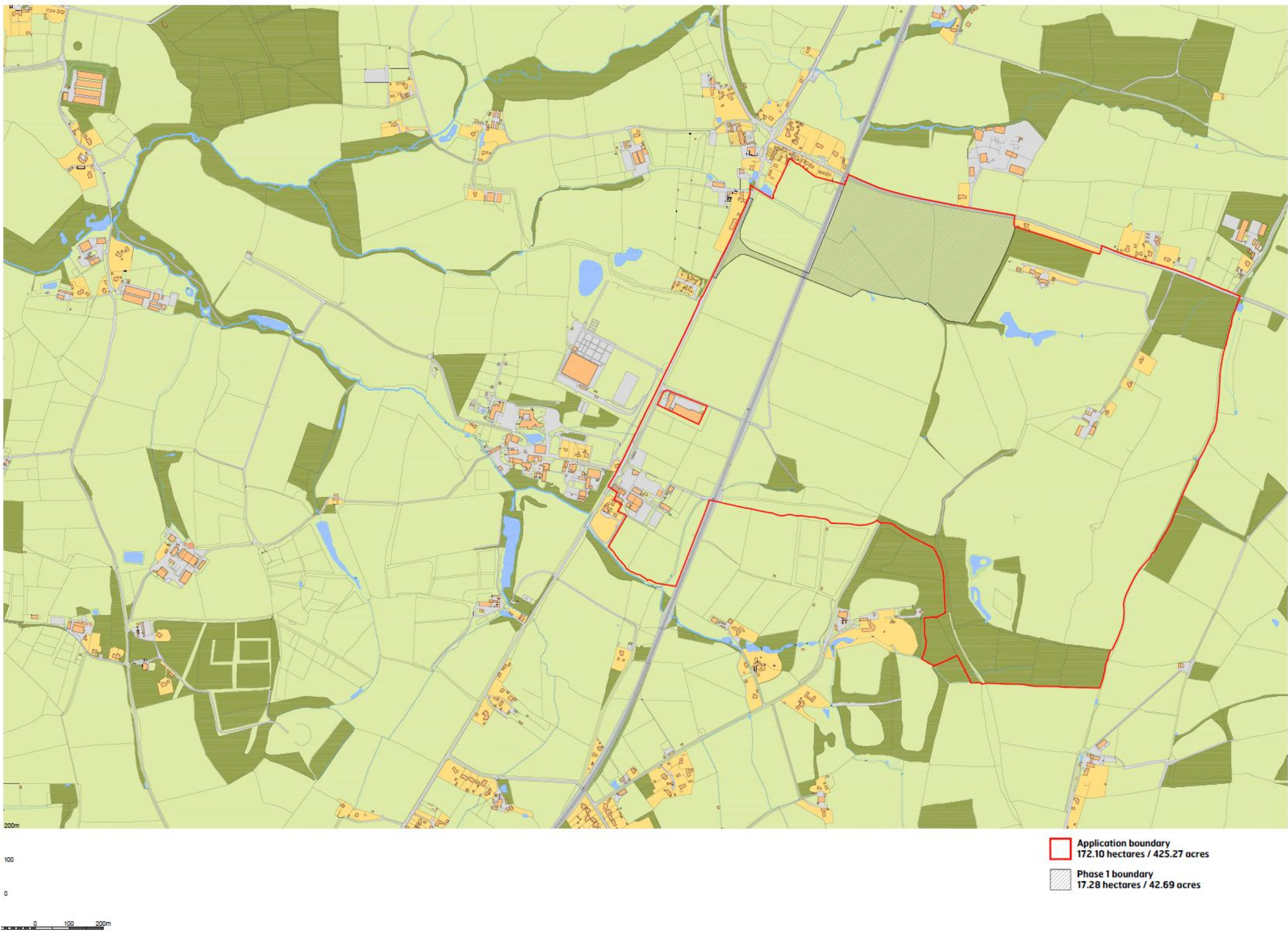
¹ Her Majesty's Stationary Office (HMSO), 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. May 2017.

² HMSO, 2018. The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. The Stationary Office. October 2018.

Figure 1.1: Site Location Plan



Figure 1.2: Indicative Site Boundary and Detailed Component Extent (Phase 1) (Source: Brooks Murray Architects)



Planning Context

Local Plan

- 1.15 The statutory development plan for Horsham District currently comprises the Horsham District Planning Framework (HDPF or 'adopted Local Plan'), which was adopted in November 2015 and sets out the strategic planning framework for the period to 2031 (excluding the South Downs National Park area).
- 1.16 HDC has been undertaking a review of the Local Plan. A Draft Local Plan (2019–2036) was subject to Regulation 18 consultation in 2020. More recently, a replacement Horsham District Local Plan (2023–2040) has been prepared, with a Regulation 19 consultation undertaken in early 2024. The emerging Local Plan is currently undergoing examination by a Planning Inspector and has not yet been adopted.
- 1.17 In terms of Neighbourhood Plans, the Site is partly covered by the Billingshurst Parish Neighbourhood Plan 2019-2031 and the draft West Chiltington Neighbourhood Development Plan.
- 1.18 The Applicant has been actively promoting the Kingswood site through the HDC Local Plan review process for a number of years. While the Site is not currently allocated within the Regulation 19 version of the emerging Local Plan, HDC recognise that additional sites will be required to meet the housing target over the plan period, including the potential for strategic-scale sites. Kingswood is seen as being able to contribute to meeting identified housing and infrastructure needs within HDC, consistent with the Plan's spatial vision, settlement strategy and strategic policies for sustainable development, climate change, green infrastructure and high-quality design. The emerging Local Plan recognises the role of strategic-scale developments in delivering not only housing, but also supporting infrastructure, community facilities and accessible green space in a comprehensive and coordinated manner.
- 1.19 The preparation of the EIA Scoping Report has been informed by the evidence base that underpins the emerging Local Plan, including technical studies relating to environmental constraints, infrastructure provision, sustainability and mitigation. This ensures consistency between the assessment framework for the Development and the strategic planning context established by the Local Plan.

Project Team

- 1.20 This Scoping Report has been prepared by competent experts from the organisations listed in

- 1.21 Table 1.1. These specialists are also undertaking the EIA process, and their relevant expertise and qualifications will be stated within the ES.

Table 1.1: EIA Project Team

Organisation	Role
Our Place Sustainable Development Limited	Applicant
Quod	EIA Co-ordinator and Planning Consultant
Brooks Murray Architects	Masterplanning and Architecture
GC Insight	Socio-economics
Allen Pyke Associates	Landscape and Visual Impact
Markides Associates	Transport and Access
Air and Acoustics Consultants	Noise and Vibration, Air Quality
Urban Edge Environmental Consulting	Biodiversity
Weetwood	Water Resources and Flood Risk
Reading Agricultural Consultants	Agricultural Land and Soil
Stantec	Climate Change
Orion Heritage	Cultural Heritage (Built Heritage and Archaeology)

1.22 Quod will be the lead editor of the ES and author of non-technical chapters. Quod is a member of the Institute of Sustainability and Environmental Professionals (ISEP)³ EIA Quality Mark Scheme, an accreditation scheme which sets standards for EIA practice and demonstrates a commitment to excellence in EIA activities.

³ formerly Institute of Environmental Management and Assessment (IEMA)

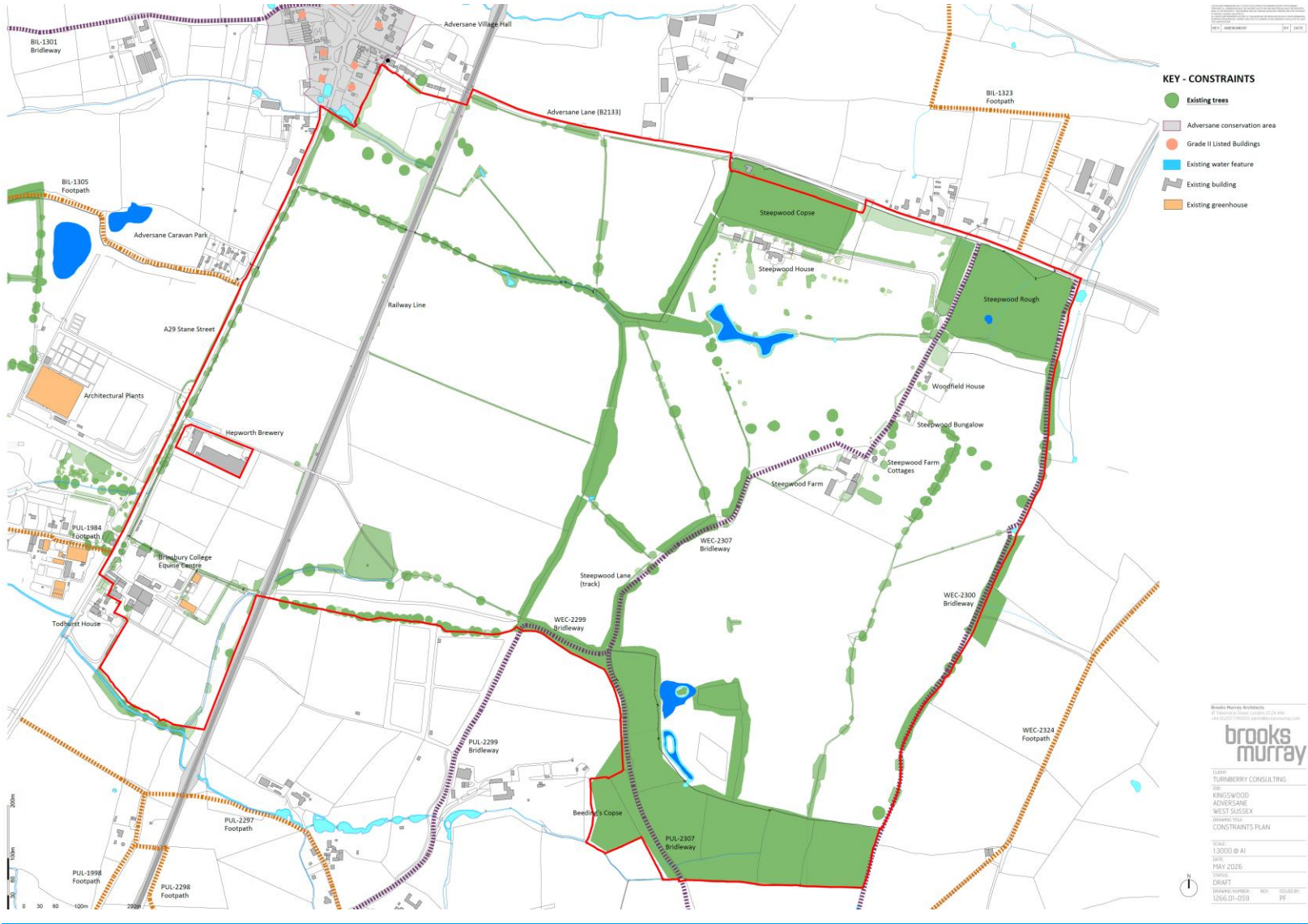
2 Site and Setting

Site Location and Description

- 2.1 The Site is located approximately 10 km south west of Horsham between the settlements of Billingshurst (c. 1.4 km north) and Pulborough (c. 3.5 km south). The village of Adversane is located adjacent to the north west corner of the Site. Figures 1.1 and 1.2 show the Site location and extent. The Site lies entirely within the administrative boundary of HDC. Figure 2.1 shows the key features in and around the Site.
- 2.2 The Site comprises predominantly rural and agricultural land mainly in arable use with areas of pasture, interspersed with mature trees and hedgerow boundaries. Three blocks of mature woodlands (Beeding's Copse, Steepwood Copse and Steepwood Rough), are also present within the Site. The Site topography is gently undulating and drops gradually from approximately 43m AOD in the east to around 10m AOD in the west.
- 2.3 The A29 Stane Street forms the western boundary of the Site, providing a key transport corridor through the area. The northern boundary is formed by Adversane Lane (B2133). The eastern and southern boundaries are formed by mature hedgerows, woodland and fields.
- 2.4 A section of the Arun Valley Line railway, which runs between Billingshurst and Pulborough, crosses north-south through the Site (parallel to the A29 Stane Street). The Adversane Level Crossing is located north of the Site on Adversane Lane (B2133). A Public Right of Way (PRoW) (WEC-2307) crosses the Site (north to south) and an additional PRoW (WEC-2300) runs along the eastern boundary of the Site. A short section of a PRoW (WEC-2299) runs along Beeding's Copse adjacent to the southern Site boundary. These PRoWs are all bridleways. Steepwood Lane, cuts through the Site and connects Stall House Lane with Adversane Lane (B2133).
- 2.5 Built form within the Site includes a number of buildings, including several farm buildings associated with Steepwood Farm and Todhurst Farm, Steepwood House with associated recreational areas (gardens, golf course and tennis court) in the north eastern part of the Site. Brinsbury College Equine Centre is located in the south western corner of the Site adjacent to the A29 Stane Street. The Site includes several areas of woodland (some of which are designated as Ancient Woodland), a deer park, ornamental ponds and drainage ditches.
- 2.6 The surrounding area is characterised by a predominantly rural landscape, with dispersed residential properties and agricultural buildings. Built form is limited to the Adversane settlement, residential properties on Adversane Lane (B2133), south and east of the Site, and development associated with the A29 Stane Street corridor including Brinsbury College campus (a further education college), Hepworth Brewery, Architectural Plants (a plant nursery) and other commercial uses.

- 2.7 A small private airstrip, Hadfold Farm Airstrip is located approximately 1.75 km north of the Site which is used for general aviation, particularly microlight aircraft. This comprises a single grass runway strip (approx. orientation south west – north east).

Figure 2.1: Key Features Plan



Environmental Designations

- 2.8 Figures 2.2 and 2.3 identify environmental designation sensitivities within the surrounding area (within 2km and 10km respectively).
- 2.9 The Site is not subject to any statutory landscape designations. The South Downs National Park (SDNP) is c. 1.5 km to the south west. The High Weald National Landscape⁴, is over 13.5 km east. A scheduled monument, comprising the remains of a Romano-British villa at Borough Farm, is c. 1.95 km to the south of the Site.
- 2.10 There are no listed buildings within the Site. Adversane Conservation Area is adjacent to the north western corner of the Site and beyond and includes several Grade II listed buildings. The closest listed building is the Grade II listed Grigg's Farmhouse c. 30m west of the Site boundary. A number of designated heritage assets are located within the wider area. These include one Grade II* listed building and a number of Grade II listed buildings within 2 km of the Site, as shown on Figure 2.2. An Archaeological Notification Area (ANA) is also located within the Site, as designated by HDC.
- 2.11 The Site is not subject to any statutory or non-statutory nature conservation designations. The Mens Special Area of Conservation (SAC) and Special Area of Scientific Interest (SSSI) is located c. 2.5 km west of the Site. The Site is located within the Wider Conservation Area of this designated site.
- 2.12 The Arun Valley comprises a network of internationally designated sites, including the Arun Valley Special Protection Area (SPA), SAC and Ramsar site, which together form a European site of international ecological importance is c. 4 km south of the Site. Additionally, the Ebernoe Common SAC is c. 7.75 km west of the Site. Nine SSSIs lie within 5 km of the Site; the closest being the Upper Arun SSSI located c. 2 km west. There are 21 non-statutory sites of local importance within 5 km, including 13 Local Wildlife Sites (LWS) and two Designated Road Verges (DRV); the closest comprising the Northwood Farm Fen and Brinsbury College LWS located on-Site.
- 2.13 The Site includes c. 28 ha of Lowland Mixed Deciduous Woodland across three woodland blocks, defined as a Habitat of Principal Importance (HPI) under the Natural Environment and Rural Communities Act (NERC) 2006. Three areas of woodland (c. 11 ha) are mapped as Ancient Woodland. The Site is not subject to any Tree Preservation Orders (TPOs).
- 2.14 Environment Agency (EA) flood maps show the majority of the Site lies within Flood Zone 1 and has a low probability of fluvial flooding. An area of Flood Zone 2 and 3 is located in the south west corner of the Site associated with an ordinary watercourse. Several ponds are located within the Site.

⁴ formerly known as an Area of Outstanding Natural Beauty (AONB)

Figure 2.2: Environmental Sensitivities (2 km buffer)

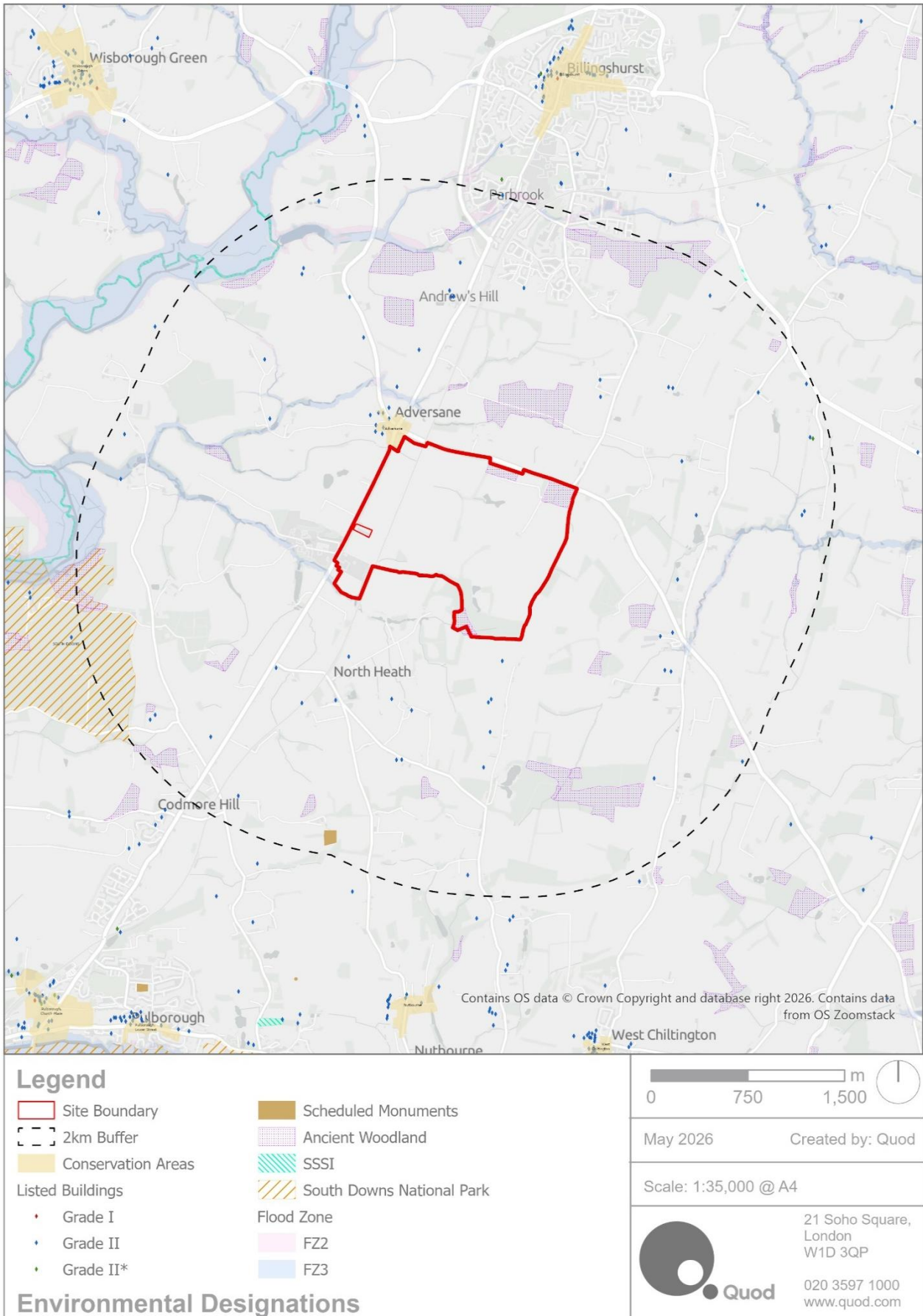
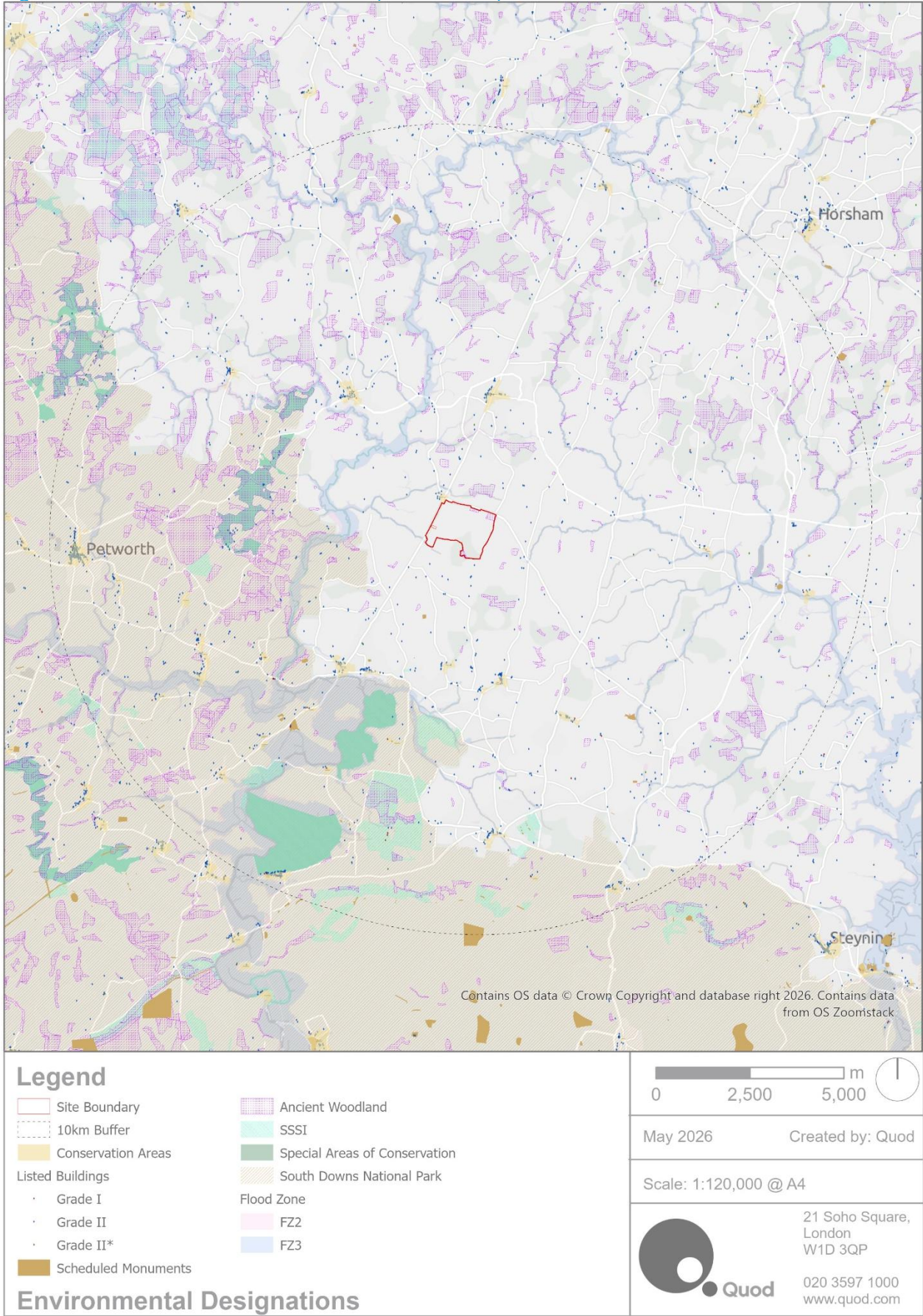


Figure 2.3: Environmental Sensitivities (10km buffer)



3 Description of the Development

Overview of the Development

- 3.1 The Development proposals will be developed following further technical analysis as part of the EIA process and in consultation with HDC, the public and other stakeholders. This section provides a brief description of the emerging proposals.
- 3.2 A hybrid planning application will be submitted with detailed design for the first phase of development and all other elements in outline subject to reserved matters. The hybrid application will form the basis of the EIA and will be defined by the following:
- **Detailed component** (c. 17 ha) detailed planning drawings; and
 - **Outline component** (c. 155 ha) Parameter Plans, Development Specification and Strategic Design Code. Parameter Plans will establish the maximum development envelope and spatial framework for the scheme, while the Development Specification will provide a description of the proposed land uses, quantum and operational assumptions. The Strategic Design Code will set out overarching design principles to guide future detailed design, ensuring that the development is delivered in accordance with an agreed quality framework consistent with the parameters assessed. The Parameter Plans would include: Land Use, Green Infrastructure, Movement and Access, and Building Heights.
- 3.3 The hybrid application would also be supported by a series of Outline Management Plans / Strategies which would be submitted for approval covering:
- Outline Landscape and Ecological Management Plan (LEMP);
 - Outline Construction Environmental Management Plan (CEMP) (including soil and waste management);
 - Drainage Strategy;
 - Lighting Strategy;
 - Outline Construction Traffic Management Plan (CTMP);
 - Framework Travel Plan;
 - Delivery and Servicing Strategy; and
 - Sustainability and Energy Strategy.

Land Uses

- 3.4 The Development is expected to provide a range of land uses including:
- **Residential:** Up to 3,200 new homes (Use Class C2 and C3) comprising a mix of sizes, types and tenures to meet the needs of the district and local communities, including affordable housing and elderly living accommodation. It is expected that

approximately 350 homes would be included in the detailed component. Only up to 150 units within the Development are expected to be Use Class C2;

- **Local Centre Uses and related uses:** These could include a range of commercial, business and service uses (Use Class E), e.g. retail, food and drink, medical, health, community services, and childcare facilities;
- **Office and Light Industrial** – c. 12,500 sqm (Use Class E(g));
- **Leisure and Sport:** Including indoor and outdoor sports and recreation facilities;
- **Community Uses:** Community, sports and leisure infrastructure (Use Classes F1 and F2), including community facilities and indoor recreation uses. Cultural and community uses (sui generis), including venues for entertainment, leisure and social activities;
- **Education:** A secondary school and up to two primary school sites likely to be located close to the local centre and other key community facilities;
- **Hotel;** and
- **Gypsy and traveller pitches.**

3.5 At this stage the area / maximum floorspace for the non-residential uses are not yet confirmed.

3.6 As a worst-case assumption, for the purposes of EIA, it will be assumed that all existing uses would cease and existing buildings within the Site may be demolished. The Brinsbury College Equine Centre may relocate within the Development or to a suitable off-Site location.

Built Development Layout and Massing

3.7 Figure 3.1 provides an indicative masterplan which shows the likely extent of development zones within the Site. This is not fixed and is subject to further consultation and design development.

3.8 The maximum extent of built development and maximum heights is being designed to respond to the valley and plateau topography, landscape character, and existing constraints such as the railway and woodland (including ancient woodland). Building heights are likely to range between 2 to 4 storeys, with the potential for slightly taller buildings in the local centre.

3.9 A local centre would be located between the A29 Stane Street and railway which would provide a range of 'town centre' uses to service the Development and local area. These uses are likely to include commercial, business and service uses (Use Class E), e.g. retail, food and drink, medical, health, community services, and childcare facilities.

3.10 An area of land adjacent to the local centre is safeguarded within the Development to allow a railway station to be delivered by Network Rail in the future. A railway station does not however form part of the Development and would be subject to a separate planning application in the future.

- 3.11 Land for office, light industrial and a secondary school would be provided off the A29 Stane Street. Two primary schools are also included although the second would be subject to need. A hotel would also be provided within the Development.

Infrastructure and Access

- 3.12 The detailed component would include details of access from the A29 Stane Street, which would include the principal means of access to the Development via a new roundabout and access onto Adversane Lane (B2133). Other points of access would be included in the outline component of the application, including a further A29 Stane Street junction (ghost island) and a second junction on Adversane Lane (B2133).
- 3.13 A new bridge will be provided across the Arun Valley Line railway to enable access from the A29 Stane Street to the east of the Site. Delivery of this bridge would enable Network Rail to either close or replace the existing Adversane Level Crossing on Adversane Lane (B2133) as traffic would be able to route through the Development. However, closure of the Adversane Level Crossing does not form part of the planning application.
- 3.14 Land will be safeguarded within the Site for the future delivery of a railway station adjacent to the Arun Valley Line and proposed local centre. Both Network Rail and Govia Thameslink have confirmed the safeguarded area is a suitable location for a new station. The station does not form part of the Development and would be subject to a separate planning application.
- 3.15 The Development is being designed to integrate bus services and active travel corridors would be provided to encourage walking and cycling together with a mobility hub. Existing PRowS would be retained and enhanced within the Development. Additional walking and cycling routes which link to the surrounding network would also be provided.
- 3.16 Some off-site highway improvements will be required, and these would be considered as part of the Development for EIA purposes. On-Site and off-Site infrastructure and utility works to include electricity grid, potable, waste water and fibre connections would also be considered as part of the Development.

Green Infrastructure

- 3.17 The Development will provide areas of green space and public open space, with sports pitches, allotments, biodiversity areas, sustainable drainage systems, recreation, play, and ancillary facilities. Existing landscape and important biodiversity features such as ponds, woodland and hedgerows will be retained within the Site as far as practicable. The Development will deliver a minimum of 10% biodiversity net gain in line which will include a network of green and blue infrastructure.

Construction and Delivery

- 3.18 The Development is expected to be delivered in phases although flexibility in phasing would be reserved in the application. Construction of the Development will be dependent on market demand although subject to planning permission, works could commence in 2028,

first occupations could be in 2030 and completion could be in 2045. This represents a programme of around 17 years, although the ES would be based on reasonable worst-case assumptions.

- 3.19 The detailed component, in the north west corner of the Site, would likely comprise the first phase of construction. Works would be expected to move gradually south and then eastwards.
- 3.20 Due to the topography of the Site, it is likely that some engineering works including ground re-modelling may be required to create suitable level platforms for the development areas. Principles of ground engineering work would be set out in the application where appropriate.

Figure 3.1: Indicative Masterplan [NOT FINAL]



4 EIA Methodology

Introduction

- 4.1 The ES will be prepared in compliance with the EIA Regulations. Reference will also be made to current EIA good practice guidance. This section outlines the general approach to the EIA process.

Consultation and Scoping Opinion

- 4.2 A programme of consultation with key stakeholders will be undertaken with statutory and non-statutory consultees throughout the Development design and in the lead up to the planning application. Key stakeholders will include (but not limited to):
- HDC - Planning, Environmental Health, Design and Conservation;
 - West Sussex County Council (WSCC) – Highways & Transport (including PRow), Lead Local Flood Authority, Minerals and Waste, and Local Education Authority;
 - Surrey County Council (County Archaeologist –advisor to HDC);
 - Chichester District Council;
 - Local Parish Councils;
 - Local residents, businesses, users and landowners;
 - Natural England;
 - NHS Sussex Integrated Care Board;
 - Historic England;
 - Environment Agency;
 - Network Rail;
 - National Highways; and
 - Utility providers including Scottish and Southern Electricity Networks (SSEN), UK Power Networks (UKPN) and Southern Water (water and wastewater).
- 4.3 In accordance with Regulation 15(4) of the EIA Regulations, the local planning authority is required to consult statutory stakeholders regarding the proposed scope of the EIA prior to issuing their EIA Scoping Opinion.
- 4.4 In line with the EIA Regulations, the ES will be 'based on' the Scoping Opinion provided by HDC. Each ES topic chapter will set out key points made during scoping correspondence between the project team and stakeholders and will explain how these have been addressed by the EIA process.
- 4.5 Public consultation will be ongoing during the design process, prior to the preparation and submission of the hybrid application. The feedback to be received through these public

consultation activities will be considered within the design evolution. These will be detailed in a Statement of Community Involvement that will accompany the planning application.

Approach to Alternatives

- 4.6 In accordance with the EIA Regulations, the ES will provide *‘a description of the reasonable alternatives.... relevant to the proposed project and its specific characteristics which have been considered by the Applicant and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’*.
- 4.7 The ES will describe the reasonable alternatives to the Development which have been considered by the Applicant, including:
- The ‘do-nothing’ scenario - this will provide brief comment on no Development taking place;
 - Alternative site extents;
 - Alternative uses and scale/quantum of development; and
 - Alternative designs – for example, alternative access, railway bridge locations, built development height and extent, green infrastructure strategies, together with the justification for the selection of the final design.
- 4.8 The Applicant has not considered alternative sites and therefore these will not be considered in the ES.
- 4.9 The ES will summarise the evolution of the Development design, setting out key factors which influenced the design process.

Significant Effects and Scope of the EIA

- 4.10 As highlighted by the UK Government Online Planning Practice Guidance⁵ (PPG), where considering the scope of EIAs, local planning authorities *‘should limit the scope of the assessment to those aspects of the environment that are likely to be significantly affected’*.
- 4.11 With respect to identifying the likely significant environmental effects associated with the Development, consideration is given to potential effects associated with the construction phase and completed Development. These effects could be both beneficial and adverse and deemed to be ‘significant’ on the basis of:
- The value / importance of the resources and receptors that could be affected;
 - The predicted magnitude of environmental change and / or impact experienced by these resources and receptors, accounting for their size, duration and spatial extent;
 - The susceptibility or sensitivity of resources / receptors; and

⁵ Ministry of Housing, Communities and Local Government (2018). Planning Practice Guidance: Environmental Impact Assessment. Available online: <https://www.gov.uk/government/collections/planning-practice-guidance> [Accessed: April 2026].

- Options for avoiding, reducing, offsetting or compensating for any potentially significant adverse effects and the likely effectiveness of such mitigation measures.
- 4.12 The proposed scope of the EIA has been defined through desktop study, surveys, a review of the emerging proposals, pre-application discussions with HDC and the professional judgement of competent experts.
- 4.13 Sections 5 to 14 set out the aspects of the environment that are likely to be significantly affected by the Development and therefore scoped into the ES. The topics proposed to be scoped into the ES included:
- Socio-economics;
 - Transport and Access;
 - Noise and Vibration;
 - Air Quality;
 - Agricultural Land and Soils;
 - Water Resources and Flood Risk;
 - Biodiversity;
 - Climate Change;
 - Cultural Heritage (Archaeology and Built Heritage); and
 - Landscape and Visual Impacts.
- 4.14 Section 15 sets out the aspects of the environment where significant effects are unlikely and are therefore the topics which are proposed to be scoped out of the ES.

Study Area

- 4.15 The study area for each environmental topic will be defined by the spatial extent over which likely significant effects could occur, considering the nature of the Development, relevant pathways for impact, and the information required to assess those effects. Topic-specific guidance and consultation with stakeholders will also inform the extent of study areas. Further detail is provided in the technical sections (Sections 5 – 14).

Establishing the Baseline Conditions

- 4.16 Baseline environmental conditions will be established to provide a robust understanding for identifying and evaluating likely changes arising from the Development. The baseline will enable the assessment of likely significant effects and will also inform the iterative design process, facilitating the identification of embedded mitigation and opportunities for environmental enhancement.
- 4.17 For most topics, the baseline will reflect existing environmental conditions on and around the Site, informed by desk-based review, field survey, technical investigations and modelling undertaken in 2025 and 2026. The ES will also describe, where relevant, the likely evolution of the baseline in the absence of the Development (the ‘future baseline’).

- 4.18 For certain topics (e.g. air quality, noise and transport), the assessment will be undertaken with reference to future baseline conditions to reflect forecast changes in environmental and operational context. The future baseline will be defined, where practicable, based on available information, committed developments and reasonable assumptions informed by current evidence and scientific understanding. Where future baseline years are used to assess environmental effects, these will be clearly identified within the relevant technical ES chapters.

Approach to Assessment

- 4.19 The ES will describe the likely significant environmental effects of the Development during both the construction (including demolition and site preparation) and completed development phases. The assessment will be proportionate and focused on those effects that are likely to be significant and will identify appropriate mitigation measures where necessary.
- 4.20 The ES will assess the detailed and outline components of the hybrid application, together with any off-site works that form an integral part of the Development (for example access improvements, utility connections or other supporting infrastructure). The detailed component will be assessed on the basis of the submitted detailed proposals. The outline component and any integral off-site works will be assessed using the parameter plans, development specification and strategic design code, applying reasonable worst-case assumptions where necessary and having regard to the level of design information available at the time of application. Significance will be determined by reference to the likely effects on receptors. Where effects (and mitigation measures) can reasonably be attributed separately to the detailed component, outline component or off-site works, this will be identified in the relevant technical chapter. Where effects arise from the Development as a whole, a combined significance conclusion will be reported.

Demolition and Construction Stage

- 4.21 The ES will include an indicative description of demolition and construction activities, including the principal works, anticipated programme and broad phasing principles (where appropriate). Final construction methodologies and detailed sequencing will be determined by the appointed contractor.
- 4.22 In the absence of detailed construction information, the assessment will adopt a precautionary 'reasonable worst-case' approach, consistent with established EIA practice. This will ensure that the assessment considers scenarios where environmental effects are likely to be greatest. For example, construction traffic assessments will be based on periods of peak activity, when construction vehicle movements and on-site operations are expected to be highest. Assumptions regarding phasing and the introduction of future receptors will also be made where relevant.
- 4.23 An indicative construction programme will be presented in the ES to inform assessments, with an overall construction programme currently anticipated to be around 18-19 years.
- 4.24 The planning application will be accompanied by an Outline CEMP, setting out a framework of mitigation and good practice measures to be implemented during construction. The Outline CEMP will consolidate mitigation identified through the EIA process and will be

secured through planning conditions. An Outline CTMP will also accompany the application, setting a framework for how construction traffic will be managed, including access, routing, vehicle movements and mitigation measures, ensuring that impacts on the highway network and local receptors are minimised.

- 4.25 In accordance with ISEP guidance⁶, the Outline CEMP and CTMP will be treated as frameworks for the delivery of construction-phase mitigation and are therefore considered as tertiary mitigation⁷ measures, reflecting standard good practice and regulatory controls. However, where specific measures within these documents are relied upon to avoid or reduce likely significant effects, these will be identified explicitly and taken into account in the assessment, rather than being treated as generic mitigation. An example of an embedded or 'primary mitigation' measure secured through these plans, could include a bespoke HGV routing strategy or receptor specific acoustic barrier.
- 4.26 The Outline CEMP and Outline CTMP will be taken into account in defining the 'assessment case' for construction. Accordingly, the assessment of likely significant effects will reflect the implementation of the control measures secured through these documents. Effects that would only arise in the absence of such controls will not be presented as 'likely effects', as they are not expected to occur.

Completed Development Stage

- 4.27 The assessment of the completed Development will consider the environmental effects arising from the permanent physical form of and operational use of the Development.
- 4.28 For most topics, the assessment will consider the likely significant effects at an appropriate future assessment year, assumed to represent the completed and fully operational Development (currently anticipated to be 2045). This approach represents a robust assessment scenario, recognising that full occupation may occur incrementally. Any topic-specific deviations will be detailed in Sections 5–14.
- 4.29 The EIA will assess both the Detailed component and the outline component of the Development, together with any associated works (e.g. off-site infrastructure improvement works) as the 'EIA Development'. The detailed component will be assessed on the basis of the submitted detailed drawings and application documentation.
- 4.30 The outline component will be assessed in accordance with a parameter-based ('Rochdale Envelope') approach, using the submitted Parameter Plans, Development Specification and Strategic Design Guide. These documents define the permissible development envelope (including maximum quantum, land uses and spatial parameters) and will form the basis for assessment. The EIA will adopt reasonable worst-case assumptions within this envelope to ensure that the full range of potential environmental effects is robustly assessed, whilst allowing for an appropriate degree of flexibility in the evolution of the design within the

⁶ IEMA (now ISEP). August 2024. Implementing the Mitigation Hierarchy from Concept to Construction.

⁷ Defined as measures which are required regardless of any EIA assessment, as it is imposed, for example, as a result of legislative requirements and/or standard sectoral practices. For example, considerate contractor practices that manage activities which have potential nuisance effects.

defined parameters, provided that any such variation remains within the assessed envelope and does not give rise to materially different or greater environmental effects.

- 4.31 A number of management plans relevant to the operational Development will be submitted with the planning application, including a Travel Plan, Delivery and Servicing Plan, Outline LEMP, and Drainage Strategy, among others. Where these are submitted for approval, they will be taken into account in the assessment of likely significant effects. The assessment will therefore consider the Development inclusive of these committed measures, such that anticipated effects reflect the mitigation embedded within the proposals. This approach supports a proportionate assessment, focusing on the residual effects that are likely to occur following the implementation of these measures.

Determining the Significance of Effects

- 4.32 Determination of the significance of environmental effects is intended to inform decision-making. Significance will be evaluated by topic specialists using either generic or topic-specific criteria, as appropriate. Effects will be described using a consistent terminology (e.g. major, moderate or minor; adverse, beneficial or negligible), informed by the magnitude of the impact and the sensitivity of the affected receptor(s).
- 4.33 “The duration of effects will be described as short, medium or long term, and as temporary or permanent. The definition of these categories will be applied on a topic-specific basis, reflecting the relevant assessment years (e.g. construction, initial occupation and future baseline) and the expected evolution of effects over time, including the influence of mitigation measures. Where appropriate, indicative duration ranges (e.g. short term <2 years, medium term 2–10 years, long term >10 years) will be used.
- 4.34 Throughout the ES, residual effects will be predicted as either 'significant' or 'not significant'. Significant effects are considered material to the planning decision process. Residual effects of moderate and major scale are considered 'significant'.

Mitigation Measures, Enhancement and Residual Effects

- 4.35 The EIA process will identify opportunities for mitigation measures to avoid, prevent, reduce or offset adverse environmental effects. The design will also incorporate opportunities to deliver environmental enhancements and improve beneficial effects of the Development.
- 4.36 In line with ISEP’s guidance, mitigation will be categorised as follows:
- **Primary (inherent / ‘embedded’) mitigation:** Measures that are integral to the Development as proposed (i.e. ‘designed in’ through the site selection, layout, scale or design) and do not require further action beyond implementation of the consented scheme. These measures are secured through the application description and controlling documents such as the Parameter Plans, Development Specification and Strategic Design Guide, and are taken into account in the main assessment.
 - **Secondary (foreseeable) mitigation:** Measures that require further activity, management, approval or ongoing implementation to achieve the intended outcome (often measure-specific and developed in response to identified effects). These

measures may be proposed in the ES and secured through planning conditions and/or legal obligations, for example the preparation and implementation of a Travel Plan.

- **Tertiary (inexorable) mitigation:** Measures that would be applied regardless of the EIA because they are required by other legislative regimes, enforceable standards or established sector good practice. These measures are often captured through standard management controls (e.g. good practice measures within a CEMP for controlling construction-related nuisance) and typically do not need to be described in extensive detail unless relied upon to avoid or reduce a likely significant effect.

- 4.37 The environmental effects of the Development will be assessed taking account of primary (inherent) mitigation and, where appropriate, relevant tertiary (inexorable) good practice and regulatory controls. Where secondary (foreseeable) mitigation is required to avoid or reduce significant adverse effects, this will be identified explicitly, and the ES will present the residual effects with those measures in place.
- 4.38 The ES will also explain how mitigation will be secured, for example through planning conditions or other legal agreement or obligation, such as the Section 106 Agreement.
- 4.39 The final wording of any conditions would be confirmed through the determination process, negotiated between HDC and the Applicant and required to meet the relevant tests. As set out later in this Scoping Report, reliance on these controls has been taken into account, as appropriate, during consideration of those topics proposed to be scoped out of the ES.

Cumulative Effects Assessment

- 4.40 The EIA Regulations require that the assessment considers the potential for cumulative effects arising from the proposed development. For the purposes of this assessment, cumulative effects are defined as including:
- **Effect interactions (intra-project effects):** the combined or interactive effects of different environmental impacts arising from the Development on a single receptor or resource (for example, the interaction between noise, air quality and visual effects); and
 - **Inter-project cumulative effects:** the combined effects of the Development in combination with other existing, committed or reasonably foreseeable developments, which individually may be insignificant but could give rise to significant effects when considered together.
- 4.41 The methodology for assessing both effect interactions and inter-project cumulative effects is set out below.

Effect Interactions

- 4.42 There is no single standardised methodology for quantifying effect interactions (intra-project cumulative effects) across different technical topics, as assessment methods and significance criteria vary by discipline. Consistent with established EIA practice, effect interactions will therefore be assessed on a qualitative basis using professional judgement, informed by the residual effects reported in each technical chapter. The assessment will consider whether effects acting on a common receptor could be additive (the combined

effect is the sum of effects) or interactive/synergistic (the combined effect is different to, or greater than, the simple sum of individual effects). Effect interactions will be considered for both the construction and completed Development stages.

4.43 The assessment will start by identifying 'shared receptors' (or receptor groups) that are predicted to experience residual effects from more than one environmental topic. The review will consider residual effects of minor, moderate or major significance and, where relevant, residual effects reported as negligible where the interaction of multiple perceptible changes could reasonably give rise to a more notable combined effect. Receptors affected by only one topic will not be progressed to the effect interactions assessment, as cross-topic interaction would not be possible.

4.44 In summary, the approach will involve the following steps:

- Review each technical chapter to compile the residual effects (post-mitigation) and the receptors/resources affected for construction and completed Development stages;
- Screen for 'shared receptors' that experience residual effects from more than one topic and summarise the nature, direction and relative magnitude of those effects;
- For each shared receptor, consider whether effects are likely to act additively and/or interact (synergistically), having regard to spatial and temporal overlap, pathways and receptor sensitivity;
- Apply professional judgement to conclude the overall scale and likely significance of any combined effect interactions, noting key assumptions, uncertainties and the confidence in the conclusion; and
- Report the findings in a transparent manner, distinguishing receptors where no interaction is likely from those where a combined effect interaction is identified.

4.45 Effect interactions will be reported in a stand-alone chapter in the ES, titled 'Effect Interactions'. The chapter will present the screening of shared receptors (typically in a matrix or table), describe the potential for additive and/or interactive effects, and summarise the conclusions on any combined intra-project effects, including the basis for professional judgement, key assumptions and any limitations.

Inter-Project Cumulative Effects

4.46 An assessment of cumulative effects will be undertaken in accordance with relevant best practice, including the IEMA Guide to Cumulative Effects Assessment (2020) and Planning Inspectorate Advice Note 17 on Cumulative Effects Assessment. The cumulative assessment will consider other development that is existing, consented or otherwise 'reasonably foreseeable'. Existing built and operational development typically forms part of the baseline and would be considered in assessments where relevant.

4.47 The approach follows a structured, proportionate methodology which comprises:

- Identification of a long list of cumulative schemes;
- Refinement to a short list based on professional judgement and potential for interaction; and

- Assessment of likely significant cumulative effects, where relevant.

- 4.48 An initial long list of cumulative developments has been identified within a defined study area extending up to 10 km from the Site, informed by the nature of the proposed Development and the anticipated spatial extent of potential impact pathways (e.g. traffic generation, construction activity, emissions, landscape/visual effects and land-use interactions).
- 4.49 To ensure a proportionate and effective dataset, initial inclusion thresholds have been applied to capture developments with a reasonable potential to give rise to significant cumulative effects, either individually or in combination. The thresholds are based on typical scales of development likely to generate material environmental effects (e.g. traffic flows, construction duration and operational intensity), as well as established practice in Environmental Impact Assessment.
- 4.50 The following criteria have therefore been applied to identify relevant developments within the 10 km study area:
- Commercial development (e.g. office, industrial): $\geq 10,000$ sqm Gross External Area (GEA);
 - Residential development: ≥ 150 dwellings;
 - Minerals development: Site area ≥ 2 hectares;
 - Waste management development: Site area ≥ 0.5 hectares;
 - Transport infrastructure: All relevant schemes (e.g. road, rail or junction improvements) irrespective of scale; and
 - Energy infrastructure: All relevant schemes (e.g. generation, storage or grid infrastructure).
- 4.51 Recognising that the potential for cumulative interaction is typically greater in close proximity to the Site, particularly in a predominantly rural context, a refined set of lower thresholds has been applied within 2 km of the Site. These capture smaller-scale developments that may nonetheless contribute to cumulative effects due to their geographic proximity and potential to interact with sensitive receptors. The following thresholds have therefore been applied within 2 km:
- Residential development: ≥ 50 dwellings; and
 - Commercial development (e.g. office, industrial): $\geq 5,000$ sqm GEA (depending on type and intensity of use).
- 4.52 The above thresholds have been applied as a guide only, and not as a rigid exclusion criterion. Professional judgement has been exercised to include developments below these thresholds, for example where the scheme is particularly close to the Site or there is a high potential for interaction with the environmental effects of the Development.
- 4.53 Consistent with ISEP guidance, cumulative schemes considered in the assessment include developments at varying stages within the planning process, specifically those that have a reasonable prospect of coming forward. These include:

- Developments under construction;
- Consented / permitted developments not yet implemented;
- Submitted applications (pending determination) and developments subject to appeal;
- Schemes identified within the Planning Inspectorate's Programme of Projects (where relevant);
- Allocations within adopted or emerging Development Plans; and
- Other relevant plans, programmes or strategies that establish a framework for future development.

4.54 A comprehensive desk-based review has been undertaken using publicly available information and this process has identified an initial long list of cumulative schemes which is presented in **Appendix 1**.

4.55 The long list of schemes will be reviewed by EIA Topic specialists and a short list of schemes would be taken forward into the detailed cumulative assessment, where there is a realistic potential for likely significant cumulative effects, for example where relevant impact pathways exist and there is meaningful spatial and/or temporal overlap (such as overlapping construction periods on shared receptors or the same parts of the transport network).

Proposed Structure of the ES Technical Chapters

4.56 The ES will be structured in line with the EIA Regulations, current best practice and the scoping assessment as follows:

- **Volume 1 - Non-Technical Summary** - This will provide a concise summary, in non-technical language i.e. plain English, of the key information in the ES. The Non-Technical Summary would be produced as a standalone document in a format suitable for public dissemination.
- **Volume 2 – Main Environmental Statement Text** – This will contain the full text of the EIA. The proposed chapter headings are set out as follows:
 - Introduction;
 - Site and Setting;
 - EIA Methodology (including limitations and assumptions);
 - Development Description;
 - Alternatives;
 - Topic Chapters: Agricultural Land and Soil, Air Quality, Biodiversity, Climate Change, Cultural Heritage, Landscape and Visual Impact, Noise and Vibration, Socio-economics, Water Resources and Flood Risk, Transport and Access;
 - Effect Interactions; and
 - Residual Effects and Summary of Mitigation.
- **Volume 3 – Environmental Statement Appendices** – This will include supporting figures and technical reports, such as surveys and data sets.

4.57 Each environmental topic chapter scoped into the ES will be structured as follows:

- Introduction;
- Legislation, Planning and Guidance;
- Consultation;
- Assessment Approach;
- Baseline Conditions (including Future Baseline);
- Embedded Mitigation;
- Assessment of Effects – Demolition and Construction (including Additional Mitigation, Monitoring and Residual Effects);
- Assessment of Effects – Completed Development (including Additional Mitigation, Monitoring and Residual Effects);
- Cumulative Effects – an assessment of cumulative effects with other schemes; and
- Summary of Residual Effects

Co-ordination with Other Regimes

4.58 The Site lies within the zone of influence of a number of European designated sites identified in the Local Plan Habitats Regulations Assessment (HRA), including the Arun Valley SPA/Ramsar and SAC, Ebernoe Common SAC and The Mens SAC, which are designated under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'). Based on the scale and nature of the proposed Development, and consistent with the findings of the Local Plan HRA, the potential for likely significant effects (LSE) to arise through pathways including water resource demand, wastewater and nutrient loading, air quality and loss of functionally linked habitat, will need to be considered as part of the application. HDC as the competent authority, will be required to undertake an Appropriate Assessment of the planning application.

4.59 Where a development is subject to EIA and also requires assessment under Regulation 63 of the Habitats Regulations (known as a HRA), the competent authority must, where appropriate, ensure that the two processes are co-ordinated (Regulation 27 of the EIA Regulations). Whilst the EIA identifies and assesses likely significant environmental effects across a range of receptors, the HRA is a distinct process that considers whether the proposed development, alone or in combination with other plans and projects, would adversely affect the integrity of European sites in view of their conservation objectives.

4.60 The EIA and HRA processes will be co-ordinated, and the planning application will be accompanied by a Shadow HRA. The Shadow HRA will adopt the methodological framework and evidence base established in the Horsham Local Plan HRA, including its identification of relevant European sites and key impact pathways. It will include screening for likely significant effects and, where these cannot be excluded, information to inform HDC's Appropriate Assessment focusing on water resource demand (including demonstration of water neutrality), wastewater and nutrient inputs, air quality effects from traffic emissions, and potential effects on functionally linked habitat. The Shadow HRA will consider the proposed Development both alone and in combination with other plans and

projects, including growth identified in the Local Plan, and will be prepared in consultation with HDC and Natural England.

- 4.61 A Water Framework Directive screening assessment would also be undertaken.

5 Socio-economics

Key Baseline Considerations

- 5.1 The Site lies wholly within the administrative area of HDC, within a predominantly rural part of West Sussex located between the settlements of Billingshurst and Pulborough. Horsham District represents a significant proportion of the county's population and has experienced sustained population growth over recent decades. Census data indicates that HDC has an ageing population profile relative to national averages, with a relatively high proportion of residents aged over 50. The district has also experienced population growth above the wider West Sussex average, reflecting its attractiveness as a residential location.
- 5.2 The Site largely consists of agricultural fields, woodland and arable land and includes four residential properties and Brinsbury College Equine Centre. The employment associated with these uses is relatively low. Furthermore, the demand for social and community infrastructure (i.e. education and healthcare space) currently arising from the Site is very low, given there are only four residential properties.
- 5.3 The nearest settlement of Billingshurst, c. 1.5 km to the north, functions as a local service centre providing a range of shops, schools, healthcare facilities and community services. Larger settlements within the wider area include Horsham to the north-east and Pulborough to the south, both of which provide a broader range of retail, employment and community facilities.
- 5.4 Horsham District forms part of a relatively strong regional economy, characterised by high employment rates, relatively low unemployment, and a diverse economic base, including professional services, small and medium enterprises, and rural industries.
- 5.5 The local housing market is characterised by relatively high house prices compared to regional and national averages; a high proportion of owner-occupied housing; and affordability pressures for first-time buyers and lower-income households. There is therefore an identified need to deliver strategic-scale development to meet identified housing need.

Study Area

- 5.6 Based on consideration of relevant local and wider economic geographies and professional experience it is considered reasonable and robust to define study areas depending on the receptor and the zone of influence of likely socio-economic effects.
- 5.7 The study area for housing and employment effects would be considered as appropriate at the following levels:
- Local area: comprising the wards of Billingshurst, West Chiltington, Thakeham & Ashington, and Pulborough, Coldwaltham & Amberley;
 - District area: HDC area; and
 - Region: South East.

5.8 The study areas for identifying social and community infrastructure effects are as follows:

- Primary and Secondary Education: The provision will be based on statutory guidance⁸ for walking distances (2-miles for primary schools and 3-miles for secondary schools) as well as by having regard for school place planning areas within West Sussex and HDC; and
- Primary Healthcare, Community Facilities and Open Space: The assessment of primary healthcare, community facilities and open space and play space will be based on a distance of 3-miles from the Site to enable existing facilities within the nearest settlements to the Site to be considered in the context of the proposals.

Sensitive Receptors

5.9 At this stage, the receptors which have the potential to experience significant impacts and which will be considered within the assessment are as follows:

- The construction industry and its employees;
- The local housing market and district housing need;
- Existing education facilities and businesses within the Site and the local area;
- The local economy and labour market (employment levels and economically active residents);
- Existing local community or social infrastructure and its users; including new residents and employees to be accommodated by the Development, specifically:
 - Primary Schools (Reception to Year 6) within the defined study area;
 - Secondary Schools (Years 7 to 11) within the defined study area;
 - GP surgeries within the defined study area; and
 - Open space and play space within the defined study area,

Scope of Assessment

5.10 The following potential effects have been identified and are scoped in:

Demolition and Construction

- Temporary changes in regional demand for construction workers associated with direct, indirect and induced employment opportunities throughout the construction period.

Completed Development

- **Housing Delivery:** Long term changes in the supply of new homes, including affordable homes, contributing to meeting need identified by HDC;

⁸ Department for Education, 2024. Travel to School for Children of Compulsory School Age. Statutory Guidance for Local Authorities.

- **Population:** Long-term changes to the supply of labour and changes to the demographic profile of the population due to the creation of new housing;
- **Social and Community Infrastructure:** Long-term changes in the effect of the population accommodated by the new homes on the demand for social and community infrastructure, specifically schools, primary healthcare, community facilities, open space and children's play space;
- **Employment and Local Economy:** Long-term changes to the local economy through direct and indirect employment supported by non-residential uses, together with increased household spending levels from new residents of the Development. Long-term changes to HDC's council tax and business rates collections as a result of additional households and commercial floorspace being provided on-Site would also be considered.

Non-Significant Effects

5.11 The following effects are not considered to lead to significant effects and consequently will be scoped out of the assessment:

- **Dentists** – it is not appropriate to undertake a quantitative assessment of impact on the capacity of dentists in the same way as for primary healthcare. Take up and usage of dentists varies and cannot be accurately predicted or measured at a site-specific level. Advice on 'How to Find an NHS dentist⁹' from the NHS advises that dental practices do not have a catchment area based on place of residence, so provision is not planned for at a site-specific scale.
- **Crime** – it is not possible to accurately assess the impact of a development of this scale and type on crime. Whilst the Development will increase local population, potentially raising opportunities for crime, it be designed in line with good practice to design out crime and fear of crime. Overall, no material increase, or decrease in crime is expected compared to current conditions, and any effects are unlikely to be significant.
- **Recreation and Access to PRowS** - All PRowS are expected to be retained within the Site broadly on their existing alignment. Construction could affect the amenity (e.g. noise, visual impact) and perceived safety of users of PRow (pedestrians, cyclists and equestrian) through the generation of noise, dust and the movement of construction vehicles and there is the potential for severance. However, these effects would be considered in other ES Topic chapters including Noise and Vibration, Landscape and Visual and Transport and Access. There are no existing formal areas of recreation or public access within the Site other than PRowS.
- **Community amenity effects** – Effects experienced by local residents and communities due to construction activities and/or the completed Development would be considered in other Topic chapters such as Transport and Access, Noise, Landscape and Visual.

- **Tourism effects** – Effects experienced by local visitor attractions, which are predominantly informal or low intensity in the area, are likely to be beneficial from the new resident population in terms of local spending but not significant in EIA terms.
- **Agricultural business effects** – The Site is predominantly in agricultural use and a description of the uses is presented in Chapter 9: Agricultural Land and Soil. Effects relating to agricultural businesses are not considered to be significant and as such are proposed to be scoped out. Further justification is presented in Chapter 9: Agricultural Land and Soil.

Assessment Methodology

Baseline Characterisation Approach

- 5.12 A desk-based study will be undertaken to determine baseline conditions which will include a review and analysis of data from the following sources (the latest dataset will be used where available):
- Census (2021)¹⁰;
 - Business Register and Employment Survey (2024)¹¹;
 - Claimant Count (2025)¹²;
 - Index of Multiple Deprivation (IMD) (2025)¹³;
 - Annual Schools Census data (2025)¹⁴ and information from WSCC and HDC school place planning documents;
 - Data on healthcare services from NHS Digital (2025)¹⁵;
 - Household Spending Survey (2024);¹⁶
 - Open space and play space information from Ordnance Survey data¹⁷, alongside a desktop study and review of relevant local authority planning policy, guidance, and / or evidence base documents;
 - Relevant evidence base documents from the emerging Local Plan prepared by HDC; and
 - Information on existing uses from the Applicant and estates management team.
- 5.13 A Site survey is not proposed to be undertaken as the information collected / to be collected through the desk study review is considered to be sufficient for informing the assessment.

¹⁰ Office for National Statistics (2021). Census.

¹¹ Office for National Statistics (2024). Business Register and Employment Survey: open survey.

¹² Office for National Statistics (2025). Claimant Count.

¹³ Ministry of Housing, Communities and Local Government (2025). Index of Multiple Deprivation.

¹⁴ Department for Education (2025) Schools, Pupils and their Characteristics. (Annual School Census data).

¹⁵ National Health Service (2025) NHS Digital – Workforce Data Report. NB – it is likely that 2026 data may be available at the time of assessment.

¹⁶ Office for National Statistics (2024) Family Spending

¹⁷ Ordnance Survey, Live Data Source. OS Open Greenspace.

Method

Demolition and Construction

- Temporary construction-related employment effects will be assessed using data on construction spend estimates and average turnover per construction worker in full time employment (FTE). This will derive estimates of the likely number of temporary construction workers per annum throughout the delivery programme and a composite multiplier will be applied to estimate the indirect and induced employment levels based on the Government's Additionality Guidance. Current agricultural and other employment on-Site is expected to be low but will be estimated using information from the Applicant. If information is not available, reasonably worst-case assumptions will be applied.

Completed Development

- Delivery of housing: this will be assessed against relevant HDC housing targets based on the proposed maximum number of homes anticipated to be delivered within the emerging Local Plan period by HDC. The assessment will be informed by an indicative housing mix which will provide an indication of home size and tenure. Cautious worst-case assessment assumptions will align to the commitments made to housing delivery in the Development Specification;
- Population and Child Yield: the estimated resident population of the Development will be calculated based on average household sizes informed by 2021 Census data and consideration of ONS population and household projections (2022-based) to inform assessments relating to social infrastructure. The estimated number of children expected to live on-Site will be assessed based on locally specific child yields supplied by WSCC and HDC;
- Education: Demand for education facilities will be assessed by considering primary and secondary age child yield (Reception to Year 11) against existing capacity in schools surrounding the Site and in the context of proposed delivery of primary and secondary schools on-Site;
- Health Services: GP demand will be assessed against a benchmark of the national average provision of patients per GP. This will be used to determine the number of additional FTE doctors required as a result of the Development and compared with any allowances for on-site provision;
- Open space and playspace: Demand effects arising from new resident population will be considered against relevant local policy requirements together with on-site provision.
- Direct and Indirect Employment: Effects from employment generated by the completed Development will be assessed by applying standard job density ratios from the Homes and Communities Agency (HCA) Guidance¹⁸ to the floorspace schedule which will form part of the planning application and additionality assumptions¹⁹ will be applied where relevant to take into account any net effects; and

¹⁸ Homes and Communities Agency (2015). Employment Density Guide – 3rd Edition.

¹⁹ Homes and Communities Agency (2014). Additionality Guide – Fourth Edition.

- Additional Household Spending: An estimate of spending generated as a result of the future occupiers of the Development will be calculated using the latest available average household spending figures on retail convenience and comparison goods.
- Council tax and business rates: these will be estimated based on average Council Tax bands in HDC applied to the indicative housing mix, together with data from the Valuation Office Agency on the average rateable value per sqm of retail, office, industrial and other floorspace categories applied to the proposed amount of non-residential floorspace.

Cumulative Effects

- 5.14 The cumulative assessment will be informed by a review of the information in the public domain for the identified cumulative scheme(s) within the socio-economic study areas. The level of assessment will be proportionate to the level of certainty in the Development, e.g. whether it has planning permission, and to the level of information that is publicly available.

Assessment Criteria

- 5.15 The assessment of potentially significant effects on sensitive receptors will consider the receptor sensitivity (on a scale of high, medium, low and negligible) and the magnitude of change (on a scale of high, medium, low and negligible) to determine significance (on a scale of major, moderate, minor and negligible). The criteria to be used in the assessment have been applied on many similar schemes elsewhere and are therefore not represented here. Impacts will be quantified where possible. Where quantification is not possible, qualitative assessments will be used and justified. Residual effects that are concluded to be major or moderate are considered to be significant.

Approach to Mitigation

Demolition and Construction

- 5.16 Good practice measures to minimise disruption on local residents, businesses and communities would be set out in the Outline CEMP. A detailed CEMP would be approved before any construction work commences.

Completed Development

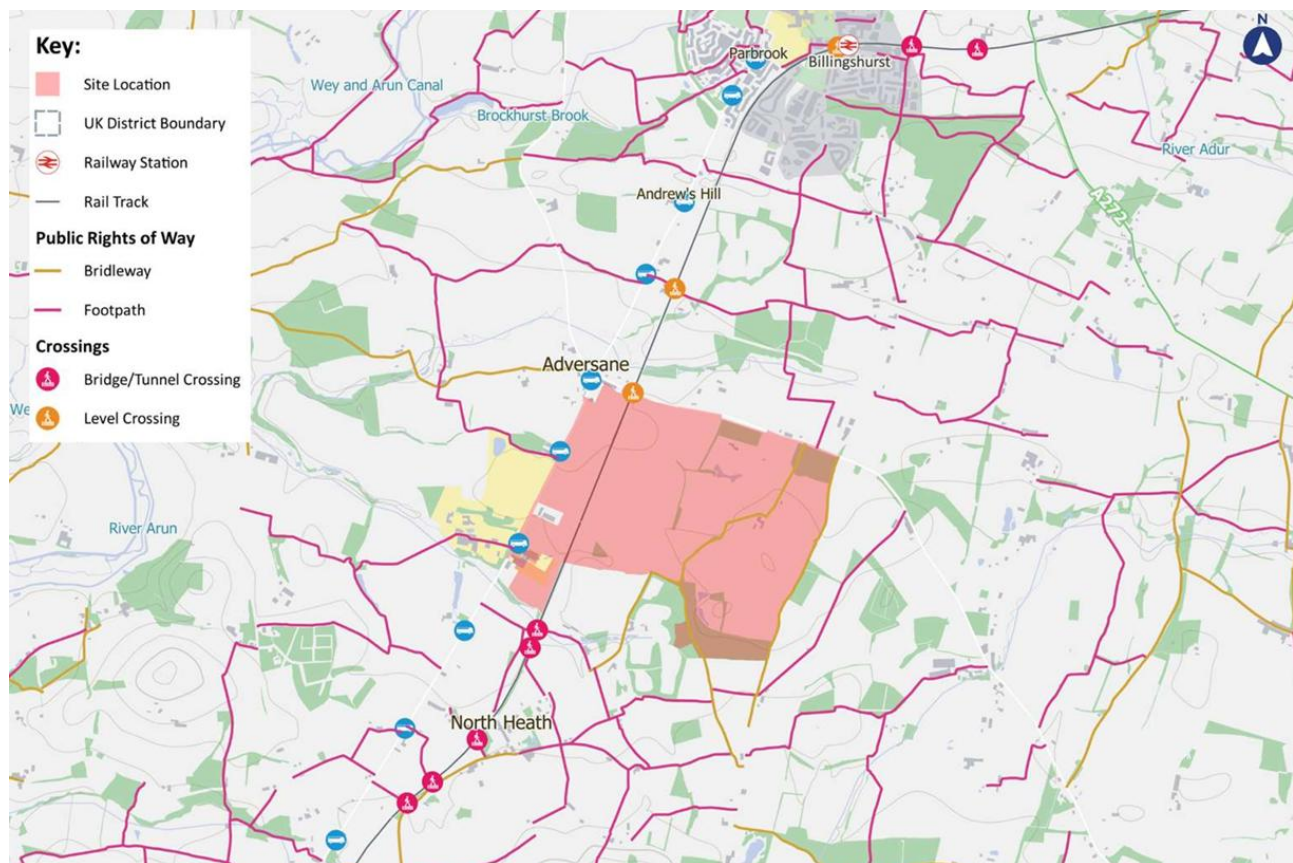
- 5.17 The Development is being designed to provide adequate provision of social and community infrastructure, including new schools and health facilities, as well as open and play space. These primary mitigation measures will form part of the detailed design (detailed component) and control documents (outline component) together with other standard developer obligations. Additional mitigation will be determined at the assessment stage, depending on the scale of effect.
- 5.18 Opportunities to enhance beneficial effects locally, such as those related to employment, would also be explored.

6 Transport and Access

Key Baseline Considerations

- 6.1 The Site is located at Adversane and is bounded by the A29 Stane Street to the west, Adversane Lane (B2133) and residential properties including Malthouse Cottages to the north-west, and open agricultural land to the south. There are a small number of existing employment uses within and adjacent to the Site, including Hepworth Brewery and an equine facility accessed from Stane Street, which are understood to generate relatively low levels of vehicle movements. Brinsbury College, Architectural Plants and other dispersed commercial and rural uses are located to the west of the A29 Stane Street.
- 6.2 Figure 6.1 shows the surrounding public transport and PRow network. Rail services are available from Billingshurst and Pulborough stations, located c. 2.3km north and 4.6km south west of the Site respectively. Both stations lie on the Arun Valley Line, providing direct services northwards to London Victoria via Horsham and Gatwick Airport and southwards to Bognor Regis via Arundel. Services typically operate at a frequency of approximately two trains per hour in each direction.
- 6.3 Bus services are available in the vicinity of the Site on the A29 Stane Street. Route 100 (operated by Compass Travel) provides connections between Pulborough, Billingshurst and Horsham, with stops including Brinsbury College, Stane Street, Blacksmiths Arms and Hadfold Farm. Services operate on a broadly hourly frequency between Monday and Saturday.
- 6.4 PRow WE-2307 (bridleway) runs north east-south west through the eastern part of the Site, connecting Adversane Lane (B2133) with Steepwood Lane. PRow WEC-2300 (bridleway) runs along the eastern Site boundary. A short section of PRow (bridleway) WEC-2299 runs through Beeding's Copse in the south of the Site.
- 6.5 There is limited dedicated cycling infrastructure in the immediate vicinity of the Site, reflecting its rural location. However, a network of rural roads provides opportunities for on-road cycling. Some shared use facilities are present on the nearby stretches of Stane Street (A29), Adversane Lane (B2133) and Marringdean Road. National Cycle Network (NCN) Route 223 (the "Downs Link") passes c. 8km the north-east of the Site. This route forms a long-distance traffic-free and minor road connection between the South Coast and Surrey, providing recreational and longer-distance cycling and walking opportunities.

Figure 6.1: Surrounding Public Transport and Pedestrian Network



Study Area

- 6.6 The Environmental Assessment of Traffic and Movement (2023)²⁰ published by IEMA (now ISEP) ('IEMA Guidelines') sets out that the transport study area should include highway links where traffic flows (or heavy vehicles) will increase by more than 30%, or on links of high sensitivity where traffic flows increase by more than 10%. The likely traffic flows from the Development in the study area will be assessed against the IEMA Guidelines and adjusted accordingly.
- 6.7 The study area will also account for any sensitive designated ecological sites and potential for associated impacts from road traffic emissions when in proximity to road links.
- 6.8 A separate scoping study is being undertaken to agree the scope of the Transport Assessment and transport modelling with WSCC Highways and HDC. The initial study area has been derived following initial Transport Assessment scoping discussions with WSCC and transport evidence from the emerging Local Plan. This initial study area is determined by the area on the transport network which is anticipated to be affected by additional vehicles delivered by the Development and the IEMA Guidelines. The corridors currently anticipated to be included in the study area are:

²⁰ IEMA (now ISEP), 2023. Environmental Assessment of Traffic and Movement.

- A29 from north of Slinfold (11 km north of the Site) to Pulborough (5 km south of the Site);
- A24 from Horsham (11 km northeast of the Site) to Washington (9 km southeast of the Site);
- A272 from Wisborough Green (4km northwest of the Site) to the A24 (8km east of the Site); and
- B2133 from the A272 (2.5km northwest of the Site) to Ashington (8km southeast of the Site).

6.9 The study area for the transport modelling will be refined as appropriate following further engagement with WSCC and testing outcomes.

Sensitive Receptors

6.10 The IEMA Guidelines identify user groups and special interests which should be considered within transport assessments. Categories of receptor sensitivity have been defined from the principles set out in the IEMA Guidelines and will be used to categorise the sensitivity of receptors to traffic for the categories of impact assessed.

6.11 A review of each highway link and receptors within the study area in relation to the key factors which affect the sensitivity of that link will be undertaken. Receptors will include non-motorised users using the local road network and PRow networks (pedestrians, cyclists and equestrians), and drivers and passengers of motorised vehicles using the highway network. The scale of sensitivity that would be applied and considered within this assessment are as follows:

- High sensitivity receptors to traffic include schools, colleges, playgrounds, accident clusters, retirement homes and roads without footways that are used by pedestrians;
- Medium sensitivity receptors include congested junctions / links, doctors' surgeries, hospitals, shopping areas with roadside frontage, roads with narrow footways, community centres, parks and recreational facilities; and
- Low sensitivity receptors include places of worship, public open space, nature conservation areas, listed buildings, tourist attractions and residential areas with adequate footway provision.

Scope of Assessment

6.12 The following potential effects have been identified and are scoped in for both the construction stage and the completed Development:

Potential Significant Effects

- Severance of communities (including existing PRowS within and surrounding the Site);
- Road vehicle driver and passenger delay;

- Non-motorised user²¹ delay and amenity;
- Fear and intimidation on and by road users; and
- Road user and non-motorised user safety.

Non-Significant Effects

Abnormal / Hazardous Loads

- 6.13 Due to the nature of the Development as a residential-led scheme, hazardous / large loads are not considered to lead to significant effects and consequently will be scoped out of the assessment.

Rail Network and Public Transport

- 6.14 The railway line passes through the Site, and Adversane Level Crossing is located adjacent to the Site on Adversane Lane (B2133). The Development proposes a new bridge crossing over the railway, which is being designed in consultation with Network Rail to ensure no adverse effects on the safe operation or integrity of the railway network. The provision of the bridge would enable the closure of Adversane Level Crossing by Network Rail.
- 6.15 The Development will give rise to an increase in demand for public transport services, including rail services from nearby stations such as Billingshurst and Pulborough. However, any increase in patronage is expected to be distributed across the wider rail network and is unlikely to result in material capacity constraints or significant environmental effects. A strategy for bus service provision is being developed by the Applicant to support sustainable travel patterns by residents. Any increase in demand for station parking is expected to be modest and capable of being managed through the implementation of a Travel Plan and improved public transport and cycle accessibility, including bus connections and a cycle route from the Site.
- 6.16 Accordingly, effects on the railway network and public transport services are not considered likely to be significant.

Traffic related environmental effects

- 6.17 Effects related to construction and completed Development traffic flows associated with air quality, noise and vibration, landscape and visual, biodiversity and climate change are to be considered within respective technical chapters.

Assessment Methodology

Baseline Characterisation Approach

Desk Study

- 6.18 The assessment will be informed by a desk study based on the following information sources:

²¹ Non-motorised users include pedestrians, cyclists and equestrians.

- Review of relevant WSCC and HDC policy and strategy documents, including the West Sussex Transport Plan (2022–2036) and associated Area Transport Strategy for Horsham, WSCC Active Travel Strategy²² (2024–2036) and Local Cycling and Walking Infrastructure Plan²³, together with the emerging Horsham Local Plan and its supporting transport evidence base;
- Review of data on public transport routes, WSCC road collision and casualty data²⁴, and WSCC Definitive Map of Public Rights of Way²⁵; and
- A review of the existing highway conditions, including walking and cycling infrastructure, public transport provision and receptor location/sensitivity.

6.19 Information obtained from pre-application discussions with WSCC and HDC will also inform the assessment.

Surveys

6.20 Site surveys have been undertaken to inform the assessment, using:

- Traffic survey data for the key junctions and links carried out in November 2025. This included manual classified turning counts (MTCs) and automatic traffic counters (ATCs); and
- Department for Transport (DfT), WSCC and other data on traffic movements in the study area.

Future Baseline

6.21 Future baseline traffic conditions will be derived from traffic survey data and relevant Trip End Model Presentation Programme (TEMPro) growth factors and / or other planned growth for the completed Development year (assumed as 2045). The future baseline assumptions and model parameters will be agreed with WSCC and HDC through the Transport Assessment scoping process.

Method

6.22 The assessment will apply magnitude of impact and significance criteria developed from the IEMA Guidelines which have been applied successfully elsewhere on similar schemes in relation to the aspects listed at paragraph 6.11.

6.23 Annual Average Weekly Traffic (AAWT) flows (18hr five-day flows) and Annual Average Daily Traffic (AADT) flows (24hr seven-day flows) will be derived for all relevant links within the study area. The assessment years/scenarios would be agreed with WSCC and HDC although are anticipated to be as follows:

²² WSCC, 2025. West Sussex Active Travel Strategy 2024-2036.

²³ WSCC, 2025. West Sussex Local Cycling and Walking Infrastructure Plan.

²⁴ Available at: <https://www.westsussex.gov.uk/roads-and-travel/road-safety/road-collision-and-casualty-data/>. Accessed: April 2026.

²⁵ Available to be requested by WSCC, further details at: <https://www.westsussex.gov.uk/land-waste-and-housing/public-paths-and-the-countryside/public-rights-of-way/the-definitive-map-and-statement/>

- **2025 / 2026 Existing Baseline** – pre-construction conditions based on existing survey data.
- **2034 Opening Year Baseline + Committed Development (Without Development)** - opening year conditions including committed development but excluding the Development.
- **2034 Opening Year with Development (Phase 1 and Construction)** - 2034 Opening Year Baseline + Committed Development + Phase 1 Development + peak construction traffic.
- **2045 Future Year Baseline + Committed Development (Without Development)** – future year conditions including committed development but excluding the Development.
- **2045 Future Year (Full Development)** – 2045 Future Year Baseline + Committed Development + Development (Vision scenario).
- **2045 Future Year (Full Development)** – 2045 Future Year Baseline + Committed Development + Development (higher traffic scenario).

6.24 The need to assess intermediate phases of completion of the Development and its associated infrastructure would be dependent on the potential for new or different significant effects and would be subject to agreement with WSCC and HDC.

6.25 The planning application is not proposing to close the Adversane Lane Level Crossing. Therefore, the main assessment within the ES will be with Adversane Lane Level Crossing open as currently operating. The potential closure of Adversane Lane Level Crossing and its associated localised effects on road users with the Development in place would be considered as a sensitivity test.

Demolition and Construction

6.26 The assessment will consider a representative peak construction traffic scenario, reflecting the period during which construction traffic and associated transport effects are likely to be greatest. This will provide a robust basis for assessment, recognising that traffic flows during other parts of the construction programme are likely to be lower. Construction traffic assumptions will be based on reasonable worst-case principles, informed by the indicative construction programme, expected construction activities, and the principal construction routes identified through the Outline CTMP. The construction assessment will be undertaken against an appropriate future baseline scenario, including background traffic growth and committed development, as agreed through the Transport Assessment scoping process.

Completed Development

6.27 The completed development assessment will be undertaken using an agreed future assessment year and scenario framework informed by the Transport Assessment scoping process with WSCC and HDC. Consistent with the approach set out in the Transport Scoping Note, the assessment will be based on a vision-led approach and will test appropriate future baseline and with-development scenarios, including background traffic growth, committed development and the full development in operation, to identify where likely significant transport and access effects may arise.

- 6.28 The EIA chapter will draw on the traffic generation; distribution and junction modelling prepared through the Transport Assessment to identify and assess likely significant environmental effects on the agreed network and receptor set. The assessment will be focussed on the local junction study area presently identified through scoping, with provision to extend the study area where modelling indicates changes in traffic flows above the relevant IEMA thresholds and will report any mitigation measures and residual effects required.

Cumulative Effects

- 6.29 The assessment will consider cumulative transport and access effects by taking account of committed development and other relevant cumulative schemes identified through the wider EIA process and the Transport Assessment scoping exercise. The cumulative assessment will be proportionate and will focus on those developments and network locations where there is realistic potential for interaction with the Development's traffic effects, including the agreed future baseline scenarios used for modelling.

Approach to Mitigation

Demolition and Construction

- 6.30 The planning application will be supported by an Outline CEMP and Outline CTMP which will establish a framework of construction traffic controls and good practice measures to manage access, routing, vehicle movements, temporary traffic management and protection of pedestrians, cyclists, equestrians and PRow users. The construction strategy will follow a monitor-and-manage approach, with detailed measures to be refined through the Transport Assessment and secured through the relevant framework plans where required to avoid or reduce likely significant effects.

Completed Development

- 6.31 The Development is being designed as a mixed-use settlement that seeks to maximise internalisation of trips and increase mode share by walking, cycling and public transport. The transport evidence base will test appropriate behavioural change and core scenarios, including those derived from assumptions agreed through scoping, and mitigation will include a Travel Plan, site-wide active travel connections, public transport measures and any agreed highway or off-site works identified through the Transport Assessment. These measures will form part of the assessment case where they are secured through the application and supporting documents. Any additional mitigation required to address likely significant effects will be identified through the assessment.

7 Air Quality

Key Baseline Considerations

Air Quality

- 7.1 There are two areas in Horsham District where air pollution from nitrogen dioxide (NO₂) has historically been high enough for the council to declare an Air Quality Management Areas (AQMA). The Horsham Cowfold AQMA has since been revoked. The remaining AQMA, Horsham AQMA No1 in Storrington, is c. 7.2 km south of the Site. There are no AQMAs in Chichester District Council (CDC) area which would be considered relevant to the Development. Once an AQMA is declared the council is expected to look at the problem and try to improve air quality.
- 7.2 Both HDC and CDC have extensive networks of air quality monitoring sites. HDC undertook automatic monitoring at three sites in 2024²⁶. CDC also undertook automatic monitoring at two sites in 2024²⁷. Diffusion tube monitoring was also undertaken by HDC in both Billingshurst to the north of the Site and Pulborough to the south, as shown on Figures 7.1 and 7.2.
- 7.3 Diffusion tube monitoring carried out nearest the Site shows complete compliance of the NO₂ annual mean objective for 2020 – 2024. Full datasets will be presented within the ES.
- 7.4 Because most of the Site is expected to reflect background rather than roadside conditions, a local calibration factor of 0.9 was applied to DEFRA's mapped NO₂ background data using 2024 monitoring results from four HDC sites to improve accuracy. To note, a further background calibration process will be required in lieu of an ongoing diffusion tube monitoring survey (see Paragraph 7.24). In line with current guidance²⁸, PM₁₀ and PM_{2.5} background concentrations were not calibrated, and the resulting projected background concentrations for future assessment years remain comfortably within relevant air quality objectives.

²⁶ Horsham District Council, 2025. 2025 Air Quality Annual Status Report (ASR).

²⁷ Chichester District Council, 2025. 2025 Air Quality Annual Status Report (ASR).

²⁸ Air Quality Consultants (Part of Logika Group), 2025. Calibrating Defra's 2021-based Background Maps against 2022, 2023 & 2024 Measurements.

Figure 7.1: Nearby Local Authority Air Quality Monitoring in Billingshurst

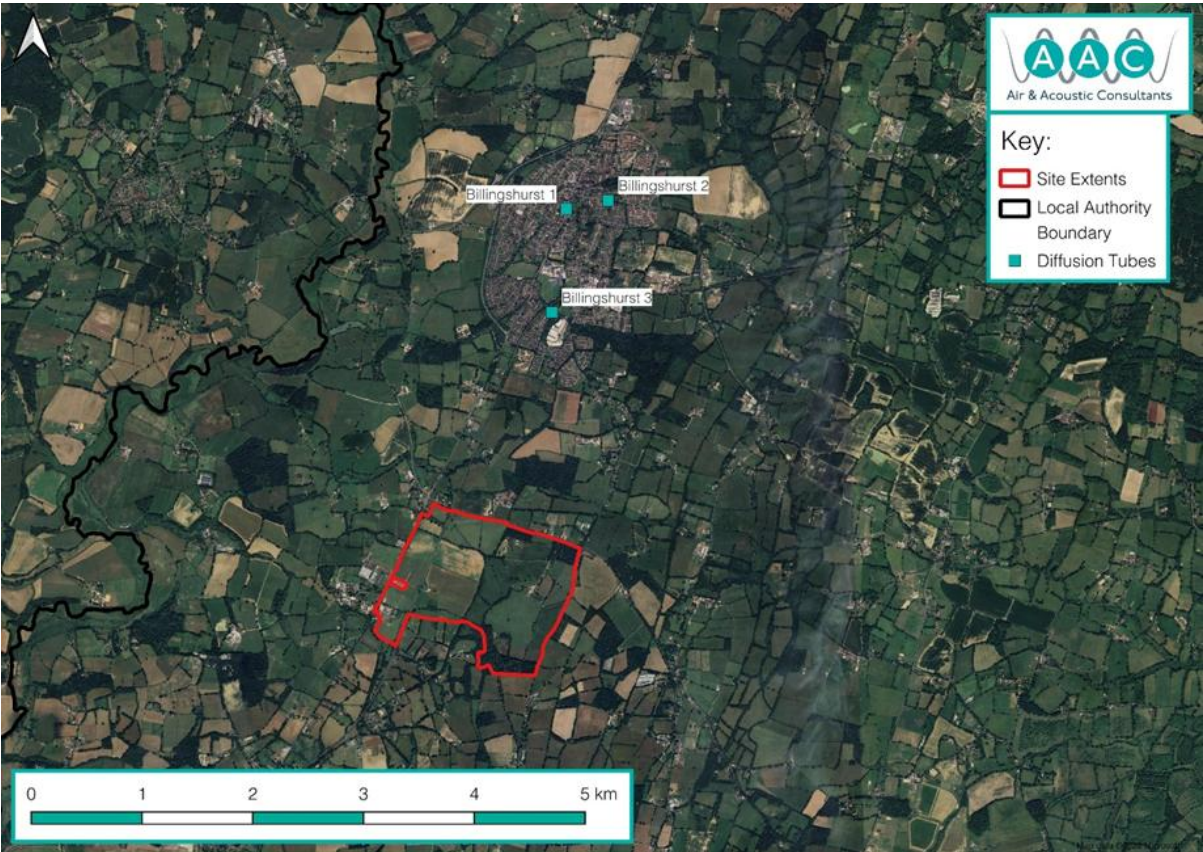


Figure 7.2: Nearby Local Authority Air Quality Monitoring in Pulborough



- 7.5 The projected calibrated background pollutant concentrations for 2026, 2030, and 2040 (to inform a 2045 assessment), covering the closest OS grid square to the Site, are provided in Table 7.1.

Table 7.1: Background Concentrations ($\mu\text{g}/\text{m}^3$)²⁹

Pollutant	2026	2030	2040
NO ₂	5.4	4.7	3.9
PM ₁₀	10.7	10.3	5.6
PM _{2.5}	5.9	9.9	5.2

Odour

- 7.6 Two potential odour sources are relevant to the Site: Hepworth Brewery and the Brinsbury College Equine Centre. Breweries can produce smells from processes, storage and wastewater handling however these sources are limited with good management. Equine centres naturally produce manure and bedding waste, which can create odours if not managed well. There is no record of odour complaints linked to the either source in publicly available sources.

Study Area

Demolition and Construction Dust Risk Impacts

- 7.7 The study area for the assessment of the demolition and construction stage has been defined using the IAQM (2024) Guidance on the assessment of dust from demolition and construction³⁰ as follows:
- Human receptors within: 250m of the boundary of the Site; or 50m of the route(s) used by demolition / construction vehicles on the public highway, up to 250m from the site entrance(s).
 - Designated ecological sites within: 50m of the boundary of the Site; or 50m of the route(s) used by demolition/construction vehicles on the public highway, up to 250m from the site entrance(s).

Demolition and Construction / Completed Development Traffic Impacts – Human Receptors

- 7.8 The study areas for the assessment of the traffic generated by the construction and operational phase of the Development would be defined using EPUK & IAQM Guidance³¹ document. The document contains the following criteria for determining the study area:
- 7.9 Changes in traffic flows, specifically:

²⁹ Notes: Data presented are derived from the Ordnance Survey grid references E: 507500, N: 122500

³⁰ IAQM (2024). Guidance on the assessment of dust from demolition and construction.

³¹ IAQM, 2017. Land-use Planning and Development Control: Planning for Air Quality

- An increase in Light Duty Vehicles (LDVs) of more than 100 AADT on roads within or adjacent to an AQMA, or more than 500 AADT elsewhere.
- An increase in Heavy Duty Vehicles (HDVs) of more than 25 AADT within or adjacent to an AQMA, or more than 100 AADT elsewhere.

7.10 Physical changes to the road network, including:

- Realignment of a road by 5 m or more within an AQMA.
- The addition or removal of a junction close to existing sensitive receptors.

7.11 Introduction of substantial combustion sources, where emissions could affect relevant receptors.

7.12 If any of these criteria are exceeded, a more detailed air-quality assessment may be required. In most cases, the magnitude of change in traffic flows will determine the extent of the study area, rather than localised changes such as road realignment or junction modifications.

Demolition and Construction / Completed Development Traffic Impacts – Ecological Receptors

7.13 In accordance with IAQM (2020) Guidance³², DMRB LA 105³³ and Natural England standing advice on air quality and designated sites³⁴, the study area for ecological receptors during the construction and completed development stages will include road links within 200 m of a designated ecological site where the Development is predicted to result in:

- An increase of $\geq 1,000$ AADT (all vehicles);
- An increase of ≥ 200 HDV (heavy duty vehicles) AADT; and/or
- A change resulting in $>1\%$ of the site's critical level or critical load for the relevant pollutant.

7.14 A screening assessment will be undertaken to determine whether the Development could make a meaningful contribution to pollutant concentrations or deposition at affected ecological receptors and therefore whether a detailed assessment is required.

7.15 Natural England's current standing advice indicates that, where emissions from a proposal can affect a designated site, the assessment should consider whether the proposal would make a meaningful contribution to the relevant critical level or critical load at the affected receptor. In practice, roads within 200 m of a designated ecological site are typically screened using recognised air quality guidance and DMRB criteria to identify those links where detailed assessment may be required.

³² IAQM (2020). A guide to the assessment of air quality impacts on designated nature conservation sites.

³³ National Highways, 2024. Design Manual for Roads and Bridges. LA 105 Air Quality (vertical barriers).

³⁴ Natural England, 2018. Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001).

- 7.16 Very small changes in traffic flows, including those below the DMRB ecological screening thresholds (for example, less than 1,000 AADT or 200 HDV AADT), are unlikely to require detailed modelling unless there is evidence that the proposal could nonetheless give rise to a contribution exceeding 1% of the relevant critical level or critical load at the designated site.
- 7.17 The previous 0.15% of existing AADT rule³⁵ from older guidance is not relied upon in current Natural England standing advice and is not proposed to be used in this assessment.
- 7.18 Where relevant, contributions from cumulative sites (committed developments) will be considered and an assessment of in-combination effects on ecological receptors will be included in the assessment, where data is available.

Sensitive Receptors

- 7.19 At this stage, and in line with the aforementioned study area, the receptors which have the potential to experience significant impacts and which will be considered within the assessment are as follows:
- **Human receptors in the immediate surrounding area of the Site**, including residential receptors along Adversane Lane (B2133), receptors on the edge of the village, and isolated dwellings near the Site boundary, which could be affected by dust emissions during demolition and construction activities.
 - **Ecological receptors in the local area**, including nearby ancient woodland and designated sites that could experience dust deposition during the demolition and construction phase.
 - **Existing human receptors located close to local roads**, such as receptors along Adversane Lane (B2133), the A29 Stane Street corridor, and other routes expected to carry construction or operational traffic - where predicted traffic increases exceed the screening thresholds set out in paragraph 7.9.
 - **Ecological receptors within 200 m of affected road links**, including designated sites such as The Mens SAC and ancient woodland, where traffic changes during construction or operation phase exceed the thresholds set out in paragraph 7.13.

Scope of Assessment

Potential Significant Effects

- 7.20 The Development has the potential to result in the following impacts during the construction stage which could lead to significant effects:
- Dust emissions arising from the construction phase of the Development have the potential to effect sensitive receptor locations. Ecological receptors also have the potential to be affected due to increased dust deposition, such as ancient woodlands within the Site; and

³⁵ JNCC, 2021. Guidance on Decision-making Thresholds for Air Pollution.

- Elevated pollutant concentrations due to emissions from traffic associated with the construction phase of the Development, and associated effects on existing human and ecological receptors;

7.21 The Development has the potential to result in the following impacts during the completed development stage which could lead to significant effects:

- Elevated pollutant concentrations due to emissions from traffic associated with the completed Development, and associated effects on existing human and ecological receptors.

Non-Significant Effects

Odour

7.22 Potential odour sources are identified within or adjacent to the Site (i.e. Brinsbury College Equine Centre and Hepworth Brewery). Brinsbury College's Equine Centre is regularly inspected and licensed, with high standards of animal care and facility management. Potential odours from Hepworth Brewery are not expected to be significant as sources are usually well-controlled in modern facilities. The Equine Centre would be relocated as a consequence of the Development. Development would also set back from the Hepworth Brewery with buffers in place. As this stage, significant odour effects are therefore not expected on the new resident population.

7.23 However, the potential odour sources and exposure of proposed future receptors will be further assessed as part of the EIA and this evidence and further rationale for scoping out an odour assessment included in the ES with reference to the IAQM (2018) *Guidance on the assessment of odour for planning*³⁶.

Assessment Methodology

Baseline Characterisation Approach

Desk study

7.24 Baseline information from the latest HDC and CDC Local Air Quality Management (LAQM) reports and Defra mapped background concentrations³⁷ will be used to inform the assessment. A desktop study will be undertaken to evaluate the baseline information and the locations of sensitive receptors for inclusion within the respective assessments.

Diffusion Tube Survey

7.25 While there is baseline information available to characterise the Site conditions, a three-month programme of diffusion tube survey is ongoing to supplement HDC monitoring data. The locations of these diffusion tube monitoring locations have been agreed with HDC Environmental Health, the locations of which are set out in Table 7.2. Four duplicate diffusion tube monitoring locations have been installed at roadside sites along the A24 Stane Street, as this highway is likely to be most affected by Development traffic. A further

³⁶ IAQM (2018). Guidance on the assessment of odour for planning.

³⁷ <https://uk-air.defra.gov.uk/data/laqm-background-home>.

urban background monitoring location has been installed in the south of Billingshurst to assist with background calibrations, as previously referenced in Paragraph 7.4. These five monitoring locations are illustrated in Figure 7.3. A further two duplicate diffusion tube monitoring locations have been installed on the A272 between Billingshurst and Petworth, due to the sensitive ecological sites adjacent to this highway. These two monitoring locations are illustrated in Figure 7.4.

Table 7.2: Diffusion Tube Monitoring Survey Locations

Site ID	Site Name	Site Type	X (m)	Y (m)
KW1	Stane St - Adversane	Roadside	507419.6	123316.4
KW2	Stane St – Hepworth Brewery	Roadside	507066.5	122507.7
KW3	Stane St – Codmore Hill	Roadside	505649.5	120155.5
KW4	Stane St – Parbrook Roundabout	Roadside	508083.8	124641.0
KW6	A272 – Wisborough Green	Roadside	505222.4	125699.6
KW7	A272 – Kingspit Lane	Roadside	500132.0	122661.5
KW8	Billingshurst South Background	Urban Background	508414.1	124418.5

Figure 7.3: Diffusion Tube Survey Locations (A29 Stane Street and South Billingshurst)

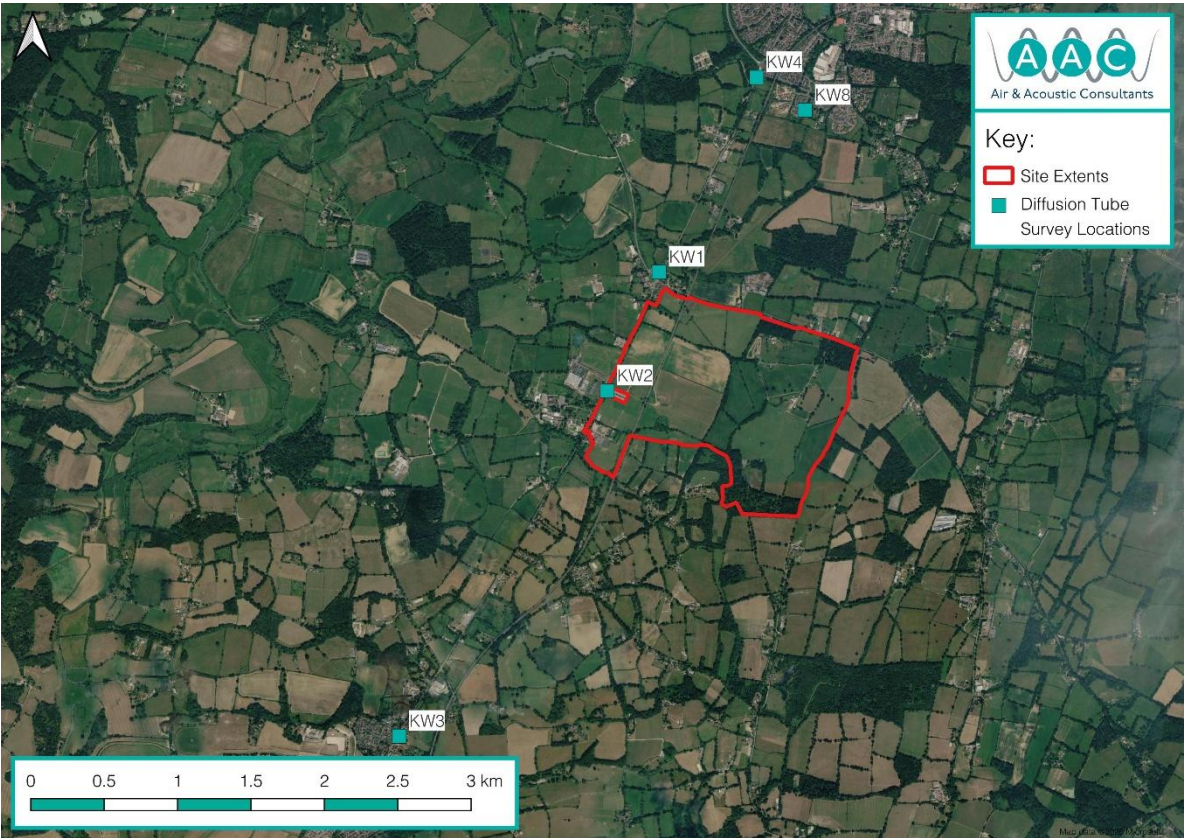


Figure 7.4: Diffusion Tube Survey Locations (A272)



Method

- 7.26 The assessment will have regard to the industry standard guidance and the Sussex Air quality and emissions mitigation guidance for Sussex (2021)³⁸, which forms part of HDC's approach to considering air quality in planning applications and requires a staged process of screening, emissions mitigation assessment and, where necessary, detailed air quality assessment. The assessments will include the following studies and elements:

Construction Dust Assessment

- 7.27 A qualitative assessment of the potential dust impacts during the demolition and construction phase(s) in line with the Institute of IAQM (2024) guidance. This guidance identifies the level of risk associated with demolition and construction dust effects. The risk is assessed for four dust-producing activities (demolition, earthworks, construction and trackout) and the level of mitigation appropriate to the risk is identified. In accordance with the guidance, no assessment of significance of effect is carried out without mitigation in place.

Demolition and Construction Activity Emissions

- 7.28 Emissions from on-site construction activities, including plant and machinery such as non-road mobile machinery (NRMM), will be considered on a qualitative basis having regard to the nature, scale and duration of the proposed works, the likely plant inventory, and the proximity of sensitive receptors. Where the assessment indicates potential for material effects, appropriate control measures will be identified within the Outline CEMP, including the use of compliant plant, good maintenance, minimisation of idling, and other measures to reduce exhaust emissions during construction.

Demolition / Construction and Operational Road Traffic Assessment – Approach for Human Receptors

- 7.29 The assessment will focus on changes in concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) as road traffic is a major source of these pollutants.
- 7.30 Comparisons will be drawn between the predicted concentrations of NO₂, PM₁₀ and PM_{2.5} at sensitive receptors with the national objectives / limits. Due consideration will be given to Defra's PM_{2.5} Targets: Interim Planning Guidance³⁹. The predictions of the likely effects of emissions arising from the Development on local sensitive receptors in isolation and in combination with other schemes will be determined using the latest version of the dispersion model ADMS-Roads. The model uses detailed information regarding traffic flows on the local road network, surface roughness, and local meteorological conditions to predict pollutant concentrations at specific receptor locations. The model would be verified against local air quality monitoring data using the latest, most representative full years' worth of data available and supplementary monitoring data collected specifically for the associated planning application. This modelling will make use of mapped background concentration

³⁸ Sussex-air Air Quality Partnership, 2021. Air quality and emissions mitigation guidance for Sussex (2021).

³⁹ Defra, PM_{2.5} Targets: Interim Planning Guidance, (2024).

data provided by DEFRA or local background monitoring data, and traffic flow projections. Traffic data will be provided by the project transport consultants.

- 7.31 Emission rates for NO_x, PM₁₀, and PM_{2.5} would be determined for each highway link where the changes in traffic trigger the thresholds for assessment, using the most recent Emission Factor Toolkit (v14.1)⁴⁰ as produced by DEFRA.
- 7.32 It is expected that receptors within the air quality study area will be modelled for the following temporal scenarios:
- Verification Year – 2025
 - Base Year – the year that the traffic surveys informing the traffic model were undertaken in. The majority of traffic surveys were undertaken in 2025, and TEMPro factors will be used to back-calculate those undertaken in 2026;
 - First year of operation and peak Construction Year (2030) with and without the Development (Construction and Phase 1); and
 - Completed Development year (2045) with and without the Development.
- 7.33 A peak construction year of 2030 has been assumed as the residential phases of Development will likely generate relatively uniform levels of traffic, with the construction of the new rail bridge constituting the key consideration of additional construction traffic. The 2030 assessment will assume that Phase 1 of the Development will have been completed, and the operational traffic associated with this will be on the highway network.
- 7.34 Committed development would be included within the future baseline year scenarios as agreed with HDC through EIA scoping and with WSCC through scoping the Transport Assessment.
- 7.35 Meteorological data, such as wind speed and direction, is inputted into the model in order to calculate pollutant concentrations at a given receptor location. The DEFRA guidance, LAQM (TG22)⁴¹, provides guidance on how to choose a suitable representative local meteorological station for detailed modelling. Based upon this guidance, data will be obtained from the most suitable meteorological station.

Demolition/Construction and Operational Road Traffic Assessment – Assessment Approach to Ecological Receptors

- 7.36 The assessment of effects on ecological receptors will focus on designated ecological sites and other relevant habitats that could be affected by air pollutant concentrations or nitrogen deposition arising from construction and completed Development traffic.⁴² An initial screening exercise will be undertaken to identify those road links within 200 m of relevant ecological receptors where changes in traffic flows are of a scale that could give rise to a material change in air quality, having regard to IAQM (2020) guidance, DMRB LA 105 and Natural England standing advice. Where screening indicates that changes in pollutant

⁴⁰ Department for Environment Food & Rural Affairs, 2026. *Emissions Factor Toolkit – EFT v14.1*.

⁴¹ Department for Environment, Food & Rural Affairs, 2025. *Local Air Quality Management Technical Guidance (TG22)*.

⁴² Note that for the purposes of the Shadow HRA, other plans and programmes (where relevant) will be included in line with the requirements of the Habitats Regulations.

concentrations or deposition are not likely to exceed the relevant screening thresholds, no likely significant effect will be concluded for that receptor.

- 7.37 Where the screening exercise identifies a potential for material effects, a more detailed assessment will be undertaken to quantify changes in concentrations of nitrogen oxides and, where relevant, nitrogen deposition, acid deposition and ammonia at the affected ecological receptors. The results will be considered against the relevant critical levels and critical loads for the designated features or habitats concerned. The air quality assessment will then be interpreted alongside ecological information, including the nature and condition of the receptor, background deposition levels and the extent to which the qualifying features are susceptible to the identified changes, as part of the Ecological Impact Assessment. The chapter would be supported by an Air Quality Designated Sites Screening Assessment.

Significance Criteria

Demolition and Construction Phase – Dust

- 7.38 The IAQM (2024) guidance does not provide a method for assessing the significance of effects before mitigation and advises that pre-mitigation significance should not be determined. It is considered that with appropriate mitigation in place, the IAQM (2024) guidance is clear that the residual effect would normally be 'not significant'.

Demolition / Construction and Operational Phase Traffic Impacts – Air Quality

- 7.39 Currently there is no formal guidance on the absolute magnitude and significance criteria for the assessment of air quality effects upon ecological and human receptors. However, the approach provided in the EPUK & IAQM (2017) guidance would be used within this assessment to assist in describing the air quality effects of additional traffic emissions from the operational phase of the Development.
- 7.40 The guidance recommends that the degree of an impact is described by expressing the magnitude of incremental change in pollution concentration as a proportion of the relevant assessment level and examining this change in the context of the new total concentration and its relationship with the assessment criterion, as summarised in Table 7.3.

Table 7.3: Operational Impact Descriptors for Individual Existing Receptors

Long Term Average Concentration at Receptor in Assessment Year	% Change in concentration relative to Air Quality Action Level (AQAL)				
	<0.5	1	2 – 5	6 – 10	>10
75% or less of AQAL	Negligible	Negligible	Negligible	Slight	Moderate
76-94% of AQAL	Negligible	Negligible	Slight	Moderate	Moderate
95-102% of AQAL	Negligible	Slight	Moderate	Moderate	Substantial
103-109% of AQAL	Negligible	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Negligible	Moderate	Substantial	Substantial	Substantial

Notes:

Values are rounded to the nearest whole number.

When defining the concentration as a percentage of the AQAL, use the 'without scheme' concentration where there is a decrease in pollutant concentration and the 'with scheme;' concentration for an increase.

AQAL = Air Quality Assessment Level, which may be an air quality objective, EU limit or target value, or an Environment Agency 'Environmental Assessment Level (EAL).'

7.41 The EPUK and IAQM (2017) guidance provides advice on the severity of an impact as a descriptor. However, although the effects might be considered 'Slight,' 'Moderate' or 'Substantial' at one or more receptor location, the overall effects of a proposed Development may not always be judged as being significant. The overall significance should be based on professional judgement, considering several factors, including:

- The existing and future air quality in the absence of the Development;
- The extent of current and future population exposure to the effects; and
- The influence and validity of any assumptions adopted when undertaking the prediction of effects.

7.42 The judgement of the significance should be made by a competent professional who is suitably qualified.

7.43 In line with the Sussex Air Quality Guidance, a Damage Costs Calculation will be undertaken which will be appended to the ES.

Approach to Mitigation

7.44 In line with the EPUK & IAQM (2017) Guidance and Sussex Air Quality Guidance, air quality will inform the location of more sensitive uses and transport routes (e.g. setbacks from ancient woodland); the approach to movement and mode share; and the relationship between land uses and main roads, and the package of sustainable transport.

Demolition and Construction Phase

7.45 Mitigation for the demolition and construction phase is likely to include standard dust control and site management measures to address potential effects arising from demolition,

earthworks, construction activities and trackout from vehicles leaving the Site. The specific measures required will be informed by the dust risk assessment, undertaken in accordance with IAQM (2024) guidance, and are expected to be secured through the Outline CEMP.

Completed Development

- 7.46 Following assessment of the magnitude of impact at identified receptors, the need for any operational mitigation will be informed by the EPUK & IAQM (2017) Guidance and Sussex Air Quality Guidance. Measures to reduce emissions would also be secured through the masterplan uses and layout (reducing the need to travel), promoting active travel and use of public transport and Travel Plans. Where embedded measures are not sufficient, additional mitigation will be identified as necessary to address any likely significant effects.

8 Noise and Vibration

Key Baseline Considerations

- 8.1 A baseline noise and vibration survey has been completed at the Site in December 2026 to quantify the baseline noise and vibration levels. Noise measurements were taken close to the A29 Stane Street, Adversane Lane (B2133), the Arun Valley Line railway and Hepworth Brewery, which are the dominant sources of noise in and around the Site. Vibration measurements were also taken close to the Arun Valley Line railway.
- 8.2 The dominant noise incidents on the Site was considered to be road traffic noise from the A29 Stane Street and Adversane Lane (B2133) together with intermittent rail noise from the Arun Valley Line railway.

Study Area

- 8.3 The assessment of construction noise and vibration from on-Site activities will focus on the nearest sensitive receptors to the Site, initially including residential properties within approximately 100 m of the Site boundary. Construction road traffic noise effects will be considered separately for receptors located along affected construction traffic routes where material changes in traffic flows are predicted.
- 8.4 The study area for the road traffic noise assessment will be defined by the extent of the highway network over which the Development is predicted to give rise to material changes in traffic flows, as informed by the Transport Assessment. At this stage, it is anticipated that the study area may extend up to approximately 8 km from the Site, where relevant traffic redistribution could affect receptors on roads including roads in the South Downs National Park in Pulborough and Storrington. To the north and west, the study area will include main roads that reach Billingshurst and Wisborough Green c. 4 km from the Site. The final study area for road traffic effects will be refined once traffic modelling has been completed.

Sensitive Receptors

- 8.5 At this stage, the receptors which have the potential to experience significant impacts, and which will be considered within the assessment are as follows:
- Existing residential properties in Adversane, off the A29 Stane Street, Adversane Lane (B2133), and the affected road network, including London Road (Pulborough), A283 (between Pulborough and Storrington), A29 (Billingshurst) and A272 (Wisborough Green);
 - Isolated Rural Dwellings and Farmsteads - Several individual properties and farm properties lie within with Site and wider influence of the scheme. Properties within the Site could potentially be temporary noise sensitive receptors depending on the phasing of works;
 - Gypsy/traveller pitches in the countryside south of Billingshurst, including north of Adversane Lane (B2133);

- Adversane Caravan Park (Stane Street Caravan Park) – on the A29 Stane Street, just south of the Adversane crossroads; and
- Future receptors: residential properties, schools, hotel and other proposed sensitive receptors within the Development.

8.6 Where there are groups of residential receptors close to Site, the effects upon the receptors nearest to the Development boundary will be determined. Effects will not be determined for every residential receptor within the study area.

Scope of Assessment

Potential Significant Effects

8.7 The Development has the potential to result in the following impacts during the construction stage which could lead to significant effects:

- Noise - Elevated noise levels affecting nearby receptors resulting from construction works at the Site.
- Vibration - Elevated vibration levels affecting nearby receptors resulting from construction works at the Site.
- Traffic - Changes to road traffic noise levels during the construction works affecting receptors within the Site and adjacent to the existing road network.

8.8 The Development has the potential to result in the following impacts during the completed development stage which could lead to significant effects:

- Operational Noise and Commercial Development: Introduction of new noise sources associated with new noise sources as part of the Development, e.g., light industrial uses, rooftop plant, and potential impacts on existing and new noise sensitive receptors.
- Operational Road Traffic – Effects due to changes in road traffic on the local network resulting from the proposed Development.

Non-Significant Effects

8.9 The following effects are proposed to be scoped out:

- Operational vibration – as the Development would not introduce new significant vibration sources; and
- Aircraft noise – Aircraft noise can be scoped out of the assessment because the Site lies well outside any airport noise contour or recognised aviation noise influence zone. The nearest commercial airports (Gatwick and Shoreham) are located at substantial distances, and published noise contour mapping shows that the Site is not affected by aircraft noise levels that would be material to the assessment of environmental effects. The Hadfield Airstrip is used infrequently and is as such not considered to represent a significant noise source.

Assessment Methodology

Baseline Characterisation Approach

Desk study

- 8.10 Initial desk-top studies, review of mapping of the local area and site visit has been undertaken to inform the identification of noise sensitive receptors. Residential properties or similar uses where people are likely to live or sleep are considered to be sensitive to noise and vibration.

Survey

- 8.11 A noise and vibration survey has been completed at the Site over a between 1 and 8 December 2026 at the locations shown on Figure 8.1. Unattended vibration measurements captured the levels of vibration produced by the railway. A measurement location was positioned in the north to capture noise levels from Adversane Level Crossing.
- 8.12 Attended noise measurements were undertaken to capture operational noise associated Hepworth Brewery and identify the sources of noise.

Figure 8.1: Noise and Vibration Survey Locations



Note: Site boundary excludes Hepworth Brewery

Method

Demolition and Construction

- 8.13 Assessment of likely vibration levels and effects during the demolition and construction phase will be completed, in accordance with the BS 5228:2009+A1:201443 Part 1 and Part 2 methods. The assessment will include information concerning likely equipment and locations that may be provided by a contractor. Where this information is not available then an assessment using generic or likely construction equipment may be completed.
- 8.14 The assessment will be informed by reasonable worst-case assumptions on equipment, locations, operational periods and construction phasing, informed by professional judgement and experience
- 8.15 Construction traffic, provided by the transport consultant, would be used to calculate potential changes in road traffic noise on identified existing roads in the vicinity of the Site. The predictions will use the Calculation of Road Traffic Noise (CRTN) calculation algorithm and any effects will be assessed using the Design Manual for Roads and Bridges (DMRB), LA 111 – Noise and Vibration⁴⁴ thresholds.

Completed Development

- 8.16 Operational road traffic noise associated with the Development - including resident vehicle trips, service and delivery movements, and any changes to the local highway network (such as new junctions, altered traffic flows, or revised speed limits) - will be assessed using traffic data supplied by the project transport consultants for the completed Development. Predicted traffic flows for the relevant assessment years (with and without the Development) will be used to calculate changes in road traffic noise levels on surrounding routes.
- 8.17 A site suitability assessment will be undertaken to evaluate the impacts of the existing and future noise environment on proposed residential dwellings and education facilities. The levels of maximum sound events will be predicted using the ISO 9613 algorithm and road traffic noise levels will be predicted in CadnaA using the CRTN algorithm. The assessment will identify any required mitigation measures to ensure suitable internal and external acoustic environments in accordance with relevant standards (set out below at paragraph 8.22). The full assessment will be provided as a technical appendix.

Cumulative Effects

- 8.18 Traffic data from relevant schemes will be included in the cumulative assessment of operational road traffic noise effects and included within baseline and development phase scenarios as appropriate. An initial long list of cumulative schemes is provided in Appendix 1.

⁴³ BSI. BS 5228-1:2009+A1:2014 Code of Practice for noise and vibration control on construction and open sites. Part 1: Noise & Part 2: Vibration

⁴⁴ Highways England, Transport Scotland, Welsh Government & Department for Infrastructure. 2020. *Design Manual for Roads and Bridge LA 111 Noise and Vibration*.

Assessment Criteria

Demolition and Construction

- 8.19 Construction noise effects will be assessed with reference to the ABC methodology in BS 5228-1:2009+A1:2014, which provides threshold values for determining the significance of construction noise at noise-sensitive receptors. These thresholds will be applied in conjunction with professional judgement, taking account of the duration, temporal pattern, and context of the works.
- 8.20 Significant effects may be deemed to occur if noise generated by construction activity exceeds the ABC noise thresholds of BS5228-1 2009:+A1:2014 by more than 10 dB. The criteria will not be treated as construction noise limits, but as thresholds that should aim to not be exceeded through the implementation of Best Practicable Means (BPM), as far as reasonably practicable).
- 8.21 Construction vibration effects will be assessed using the criteria in BS 5228-2:2009+A1:2014. Significant effects would be deemed to occur if Peak Particle Velocity (PPV) levels exceed 1.0 mm/s.
- 8.22 Construction road traffic noise will be assessed using the short-term road traffic noise change criteria set out in the DMRB. These thresholds will be used to classify the magnitude of noise change arising from construction-related vehicle movements on the surrounding road network.

Completed Development

Operational Noise Sources

- 8.23 New noise sources associated commercial and/or light industrial uses within the proposed Development would be assessed using BS 4142:2014+A1:2019 which provides a methodology for the rating and assessing of sound associated with both industrial and commercial premises. This would be applied as far as practicable based on the Parameter Plans and Development Specification, based on reasonable worst-case assumptions or detailed design information for elements of the proposal which may include loading / unloading of goods and materials, or use of mobile plant at proposed light industrial or commercial premises. Significant effects may be deemed to occur if the mitigated operational 'Rating' levels described in BS4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound exceed the measured background noise level (LA₉₀) by more than +10 dB. For the outline component, the assessment is likely to be based on achieving appropriate design criteria rather than a detailed assessment.
- 8.24 Effects of other potential noise sources on existing receptors such as town centre uses, outdoor sports or other facilities would be considered where appropriate. New education uses are unlikely to affect existing receptors, although this would be considered where appropriate.

Operational Road Traffic Noise

- 8.25 Operational road traffic noise effects on existing receptors will be assessed using the DMRB LA 111 significance criteria, which classify the magnitude of noise change in the opening

year and future assessment years. This approach ensures consistency with national guidance for evaluating road traffic noise impacts.

Site Suitability

- 8.26 The suitability of the Development for noise-sensitive uses (including residential and educational buildings, and external amenity space) will be assessed against the relevant internal and external noise criteria contained in:
- Noise Policy Statement for England (NPSE)⁴⁵;
 - Planning Practice Guidance (Noise)⁴⁶;
 - British Standard (BS) 8233:2014: Guidance on sound insulation and noise reduction for buildings (internal ambient noise levels)⁴⁷;
 - World Health Organisation Guidelines for Community Noise (1999)⁴⁸; and
 - Professional Practice Guidance on Planning and Noise – New Residential Development (ProPG)⁴⁹;
 - Building Bulletin 93 (BB93) Acoustic Design of Schools – Performance Standards (relevant to indoor ambient noise levels)⁵⁰; and
 - Acoustics of Schools: A Design Guide, 2015 (relevant to external areas used for formal and informal outdoor teaching and recreation)⁵¹.
- 8.27 Compliance with these standards will inform the need for, and extent of, any acoustic mitigation. The assessment of residential feasibility for the Development Site will be based upon the.

Approach to Mitigation

Demolition and Construction

- 8.28 Mitigation during the demolition and construction stage will generally comprise Best Practicable Means (BPM), including the use of lower-noise construction methods and modern, well-maintained plant and equipment. These measures will be set out in the Outline CEMP and therefore secured, where appropriate, through planning conditions.

Completed Development

- 8.29 Where necessary, mitigation for the proposed residential receptors within the Development may include measures such as landscape buffers, acoustic barriers, building orientation

⁴⁵ Department for Environment, Food and Rural Affairs. 2010. *Noise Policy Statement for England*.

⁴⁶ Department for Levelling Up, Housing and Communities and Ministry of Housing Communities and Local Government. 2019. *Planning Practice Guidance Noise*.

⁴⁷ BSI. BS 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings.

⁴⁸ World Health Organisation. 1999. *Guidelines for Community Noise*.

⁴⁹ Association of Noise Consultants, Institute of Acoustics, Chartered Institute of Environmental Health. 2017. *ProPG: Planning & Noise Professional Practice Guidance on Planning & Noise New Residential Development*

⁵⁰ Department for Education & Education Funding Agency. 2015. *Acoustic design of schools: performance standards*

⁵¹ Institute of Acoustics and Association of Noise Consultants. 2015. *Acoustics of Schools: a design guide*

and layout, and enhanced glazing and ventilation specifications to achieve suitable internal and external noise environments. The need for, and form of, any such measures will be informed by the assessment and would be secured by detailed design (for the detailed component) or design principles (secured by the Parameter Plans or Strategic Design Code (for the outline component)).

- 8.30 Measures to reduce emissions would also be secured through the masterplan uses and layout (reducing the need to travel), promoting active travel and use of public transport and Travel Plans. Where embedded measures are not sufficient, additional mitigation will be identified as necessary to address any likely significant effects.

9 Agricultural Land and Soils

Key Baseline Considerations

- 9.1 The Site extends to approximately 172 hectares (ha) in total and is predominantly in mixed agricultural use. Areas of non-agricultural land within the Site include the woodland parcels of Beeding's Copse, Steepwood Copse and Steepwood Rough, a section of the Arun Valley Line, access tracks, four detached residential properties, farmyards with associated buildings and the Brinsbury College Equine Centre.
- 9.2 Agricultural land quality in England is classified using the Agricultural Land Classification (ALC) system, which grades land from Grade 1 (excellent) to Grade 5 (very poor). Land in Grades 1, 2 and 3a is defined as Best and Most Versatile (BMV) and is afforded protection in planning policy due to its importance for food production. A detailed ALC and soil resources survey has not yet been undertaken at the Site; therefore, the baseline presented here is based on an initial review of publicly available datasets. The results of the detailed field survey will be reported in the ES and will supersede the provisional baseline.
- 9.3 Provisional ALC mapping identifies the Site as undifferentiated Grade 3, indicating good to moderate quality agricultural land. The nearest available detailed ALC survey data—located around Billingshurst—indicates a predominance of Subgrade 3b land, with smaller areas of Subgrade 3a and isolated pockets of Grade 2. While this provides a useful indication of likely land quality, the actual distribution of grades within the Site will be confirmed through the detailed survey.
- 9.4 The Site is underlain by the Weald Clay Formation, comprising predominantly mudstones (including shales), with subordinate siltstones, sandstones, shelly limestones, and ironstones. Several bands of more prominent sandstone occur across the Site. No superficial deposits are mapped. These geological conditions influence soil texture, drainage characteristics, and the agricultural versatility of the land.
- 9.5 Soil mapping indicates that the Site is largely associated with the Wickham 5 soil association. These soils typically comprise silty clay loam or clay loam over slowly permeable clay, resulting in profiles that are often waterlogged for extended periods in winter (typically Wetness Class IV). In areas where sandstone is present at shallow depth, soils may be better drained, with profiles more characteristic of Wetness Class II or III. These variations will be examined in detail during the field survey to determine their influence on ALC grading and soil resource management.
- 9.6 The Site and surrounding landholdings comprise a mixture of low-intensity agricultural, non-agricultural and ancillary land uses. Agricultural activity is currently undertaken on a largely informal basis, including seasonal grazing and cutting under licence, and areas of arable cultivation on parcels east and northwest of the railway. Additional land is managed periodically through topping or grazing for maintenance purposes. A deer park is present within the wider estate, although this is operated on a part-time basis and is not understood to form part of a primary commercial enterprise. Farm buildings within the Site are predominantly used for storage, with some former agricultural infrastructure long unused. Other areas, including residential curtilage associated with Steepwood House and

equestrian uses, are not in active agricultural production. Overall, the baseline is characterised by fragmented, low-intensity agricultural use interspersed with non-agricultural land uses and licences, rather than a single cohesive or intensive agricultural operation

Study Area

- 9.7 The study area comprises all of the agricultural land within the Site boundaries.

Sensitive Receptors

- 9.8 At this stage, the receptors which have the potential to experience significant impacts and which will be considered within the assessment are as follows:

- Agricultural land, including the potential for BMV quality; and
- Soil resources.

Scope of Assessment

Potential Significant Effects

- 9.9 The Development has the potential to result in the following impacts during the construction stage which could lead to significant effects:

- Permanent loss of agricultural land; and
- Loss of or damage to soil resources.

Non-Significant Effects

- 9.10 The following impacts are not considered to lead to significant effects and consequently will be scoped out of the assessment:

- **Agricultural Land and Soil Resources (Completed Development)** - effects on agricultural land and soils will arise during the construction phase, when land is taken out of agricultural use and soil resources are stripped, handled and redistributed or otherwise affected by groundworks. As no further disturbance to agricultural land or soil resources is anticipated once construction is complete, no separate significant effects are expected during the completed development phase.
- **Agricultural landholdings and enterprises** - The Site and surrounding landholdings are not considered to support a commercially significant or intensive agricultural enterprise such that likely significant environmental effects on an agricultural business would arise. The majority of land within the ownership is operated on a low-intensity or incidental basis, including seasonal grazing and cutting under licence to a third party, ad hoc arable use, and periodic land management for maintenance purposes rather than commercial productivity. Elements such as the deer park are managed on a part-time basis and are not understood to form part of a primary agricultural livelihood, while the farmyard buildings are largely in storage use, with former agricultural infrastructure (including a meat processing plant) long redundant. Other areas, including residential curtilage and equestrian facilities, are either non-

agricultural in character or expected to be reconfigured within the wider estate. Taken together, this indicates that agricultural activity is ancillary, fragmented and of limited economic significance. In this context, and in the absence of any identified reliance on the land for a viable or sustained agricultural business, the Development is unlikely to give rise to likely significant effects on agricultural businesses, and this topic can therefore be scoped out of the EIA.

Assessment Methodology

Baseline Characterisation Approach

Desk Study

- 9.11 The assessment will be informed by a desk-based study which will include a review of the following sources:
- Provisional¹ and published² (where available) detailed ALC mapping;
 - Published information on soil types⁴ and underlying geology³;
 - Site-specific agro-climatic data⁵; and
 - Information from the Applicant's estates team.

Survey

- 9.12 A Site survey will be undertaken across the agricultural land at the Site following the established guidelines for classifying agricultural land, as summarised in Natural England's Technical Information Note (TIN049)⁵².
- 9.13 All areas of built development will be surveyed at a detailed density of one observation per hectare, which is the density recommended by Natural England and which would amount to around 110 observations. Areas proposed for open space, including civic spaces, parks, play areas and natural spaces which would not be permanently sealed by built development, are proposed to be surveyed at a lower density of around one observation per four hectares, which will amount to approximately seven additional observations.
- 9.14 At each observation point the following characteristics will be assessed for each soil horizon up to a maximum of 120 cm or an impenetrable layer: soil texture; stone content; colour (including localised mottling); consistency; structural condition; free carbonate; and depth.
- 9.15 A number of soil samples will also be submitted for laboratory determination of particle size distribution, pH, organic matter content and nutrient contents (P, K, Mg).

⁵² Natural England. Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049). Available online: <https://publications.naturalengland.org.uk/publication/35012?category=9001>

Method

Demolition and Construction

- 9.16 The effects on agricultural land are assessed according to the area of land affected, either permanently or temporarily, and the grade of that land within the ALC system. The potential effects of on soil resources are determined according to the texture, and to the degree and reversibility of disturbance the resource is expected to be subject to.
- 9.17 The assessment would be based on professional judgement applied to reasonable assumptions relating the method, nature and extent of the direct and indirect effects on agricultural and soil resources.

Completed Development

- 9.18 All effects on agricultural land and soil resources are anticipated to occur during the construction phase of the Development. Completed Development effects are proposed to be scoped out.

Assessment Criteria

- 9.19 The criteria for determining the resource sensitivity and magnitude of change to agricultural land and soil receptors have been derived from guidance published by IEMA (now ISEP)⁸ and are presented in Tables 9.1 and 9.2 respectively.

Table 9.1: Sensitivity Criteria

Sensitivity	Agricultural Land	Soil Resources
High	Grade 1 and Grade 2	Clay, silty clay, sandy clay, heavy clay loam, heavy silty clay loam.
Medium	Subgrade 3a	Medium clay loam, medium silty clay loam, sandy clay loam
Low	Subgrade 3b	Sand, loamy sand, sandy loam, sandy silt loam, silt loam
Negligible	Grade 4 and Grade 5	Not applicable

Table 9.2: Magnitude Criteria

Magnitude	Agricultural Land	Soil Resources
Major	More than 20 hectares	The soil displaced from development is unable to fulfil one or more of the primary soil's functions.
Moderate	5 – 20 hectares	The soil displaced from development mostly fulfils the primary soil functions off-site or has a reduced capacity to fulfil the primary functions on-site.
Minor	Less than 5 hectares	The soil displaced from development mostly fulfils the primary soil functions on-site.
Negligible	Less than 0.1 hectares/no discernible loss	The soil retains its existing functions on-site.

- 9.20 The sensitivity and magnitude criteria are then combined to deduce the likely effect of the Development on each receptor, in accordance with the standard EIA approach.

Approach to Mitigation

Demolition and Construction

- 9.21 There are no measures available to mitigate the direct and permanent loss of agricultural land. However, the siting of built development in areas of lowest quality land available within the Site would be explored where possible.
- 9.22 Secondary mitigation is available to minimise effects on soil resources, primarily through the implementation of a Soil Resources Management Plan (SRMP), which would set out best practice measures for handling and managing the soil resources, and through a commitment to retain the soil resource on-site or identify an appropriate re-use off-site. A SRMP would be secured through the Outline CEMP.

Completed Development

- 9.23 There are no additional mitigation measures available for the completed Development.

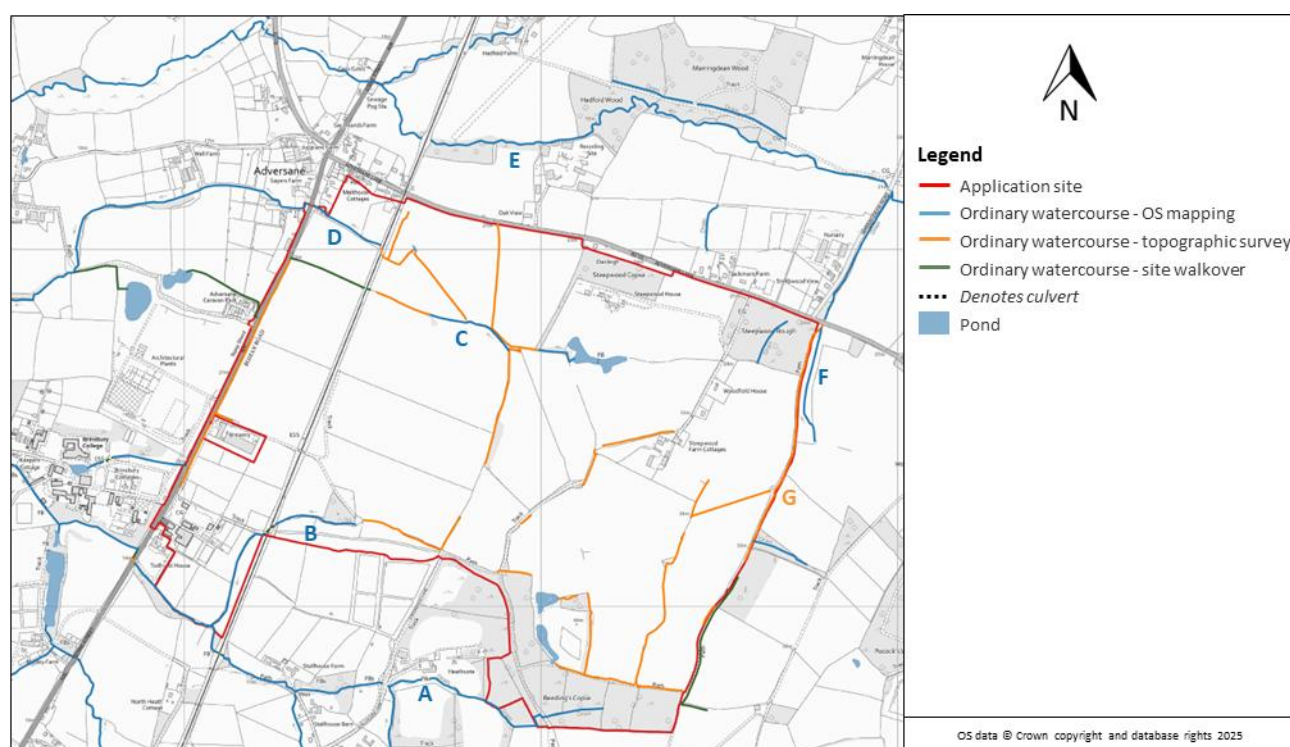
10 Water Resources and Flood Risk

Key Baseline Considerations

Surface Water

- 10.1 A number of watercourses/drainage ditches are located within or in the vicinity of the Site as illustrated in Figure 10.1. This shows that the Site and surrounding area are traversed by a network of predominantly unnamed ordinary watercourses and drainage ditches, forming a localised drainage system that ultimately discharges to the River Arun. The River Arun flows south 2.1 km west of the Site and is a designated main river (shown on Figure 2.2 and Figure 2.3).
- 10.2 A principal watercourse originates within the south-east of the Site and flows westward along the southern boundary, receiving flows from several smaller tributaries that arise within and adjacent to the Site. Several of the watercourses are routed through existing ponds and overland channels before rejoining the wider network downstream. Numerous minor ditches and drainage features are also present across the Site, which discharge directly or indirectly into this system.
- 10.3 Overall, the baseline hydrological environment is characterised by a series of interconnected, small-scale watercourses influenced by culverts and crossings, forming a linked drainage network within the Arun catchment. The Wey and Arun Canal is located c. 2 km west of the Site.
- 10.4 The Site is located within the catchment of the 'Arun (U/s) Pallingham' water body (Water Body ID: GB107041017950) which was assessed in 2022 under the Water Framework Directive (WFD) as having an ecological status of 'Moderate'. As of 2022, the chemical status did not require assessment. There are no other WFD defined surface waterbodies within the vicinity of the Site or upon which the Development would impact. The

Figure 10.1: Location of Surface Waterbodies



Hydrogeology

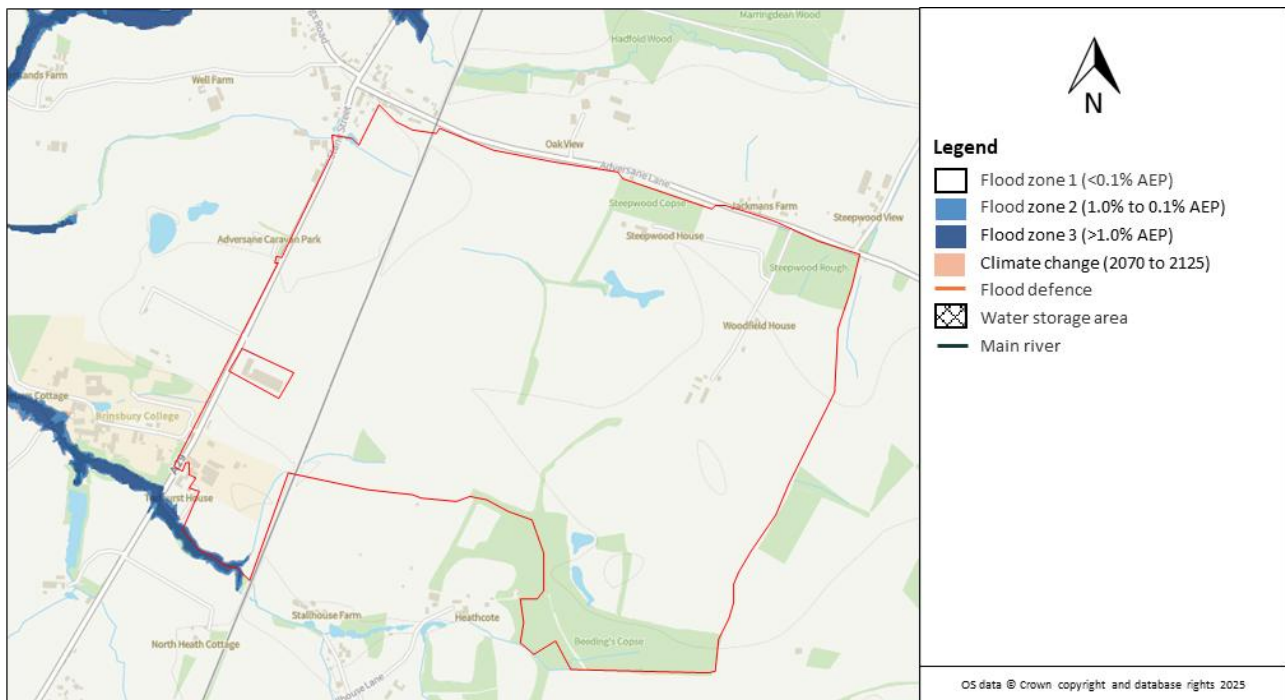
- 10.5 The National Geoscience Data Centre's Single Onshore Borehole Index holds records of one borehole in the west of the Site, within the vicinity of Hepworth Brewery. This indicates the presence of sandy clay to 3.0 m below ground level (bgl) underlain by clay to 21.0 m bgl and clay with interbedded bands of sandstone to 61.5 m bgl.
- 10.6 British Geological Survey (BGS) mapping of surface geology indicates the underlying bedrock formation comprises mudstone and areas of sandstone (Weald Clay Formation). No superficial deposits are recorded. According to the MAGIC website the mudstone bedrock at the Site is classified as unproductive whilst the sandstone bedrock is classified as a Secondary A aquifer.
- 10.7 The Site is not shown to be located within a designated Groundwater Source Protection Zone (GSPZ) or Drinking Water Safeguard Zone for groundwater; however, it is within a Drinking Water Safeguard Zone for surface water (ID: SWSGZ4317).
- 10.8 The areas of sandstone bedrock at the Site are classified as a high groundwater vulnerability risk level and the Site is located within a nitrate vulnerability zone (NVZ) for surface water (ID: S523 - River Arun (/s Pallingham) NVZ).

Flood Risk

- 10.9 The Environment Agency (EA) Historic Flood Map and Figure A4 of the Level 1 Strategic Flood Risk Assessment – Final Report (September 2024) ('Recorded Flood Outlines') indicate that there are no records of flooding at the Site.

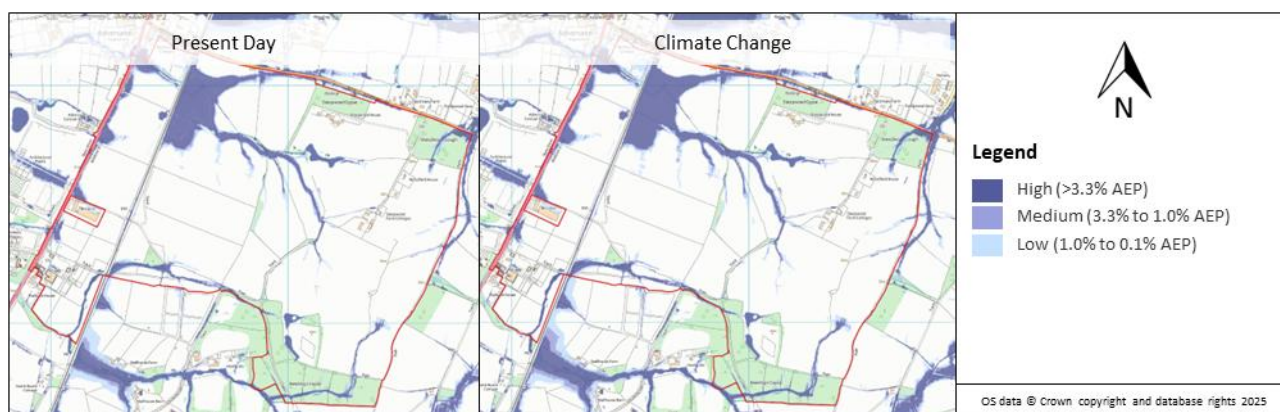
- 10.10 The EA Flood Map for Planning (FMfP) (Flood Zones 2 and 3) dataset, as shown on Figure 10.2, indicates the Site to be located in Flood Zone 1 (defined as land having a 'low probability' of flooding from rivers, i.e. a less than 0.1% annual probability). A small strip of land along the south-western boundary is indicated to be located in Flood Zone 2 ('medium probability', i.e. between 1.0% and 0.1% annual probability) and Flood Zone 3 ('high probability', i.e. 1.0% or greater annual probability); however, the area of risk is relatively confined.

Figure 10.2: Flood Map for Planning (Flood Zones 2 and 3)



- 10.11 Figure 10.3 shows areas within the Site and surrounds at risk of surface water flooding based on EA mapping. Surface water flood risk across the Site and surrounding area is generally localised and associated with existing watercourses, drainage features and topographic low points. Areas of elevated risk are identified within the south-east and south-west of the Site, linked to existing drains and ponds, although these are relatively confined. Additional areas of surface water ponding occur in the north-west and along the western boundary, influenced by overland flow pathways and drainage ditches, with further minor flow routes present in the north-east. Climate change modelling indicates a marginal increase in flood extent, with typical maximum flood depths generally less than 0.6 m, except in more pronounced ponding areas in the north-west and along key drainage channels.
- 10.12 The EA dataset indicates that the Site is not at risk of flooding from reservoirs or the Wey and Arun Canal. The 2024 SFRA indicates that the overall risk of groundwater flooding at the Site is Class 4, defined as Negligible Risk: chance of less than 1% annual probability of occurrence.

Figure 10.3: Long Term Flood Risk (Surface Water)



Land Drainage

- 10.13 The Site currently comprises predominately greenfield land, except for small, developed areas in the north-east and south-west. The Soilscales dataset produced by the Cranfield Soil and AgriFood Institute, indicate that soil conditions at the Site and within the surrounding area are described as slowly permeable seasonally wet loamy and clayey soils. LiDAR data indicates that ground levels are highest in the east of the Site, falling to the north-east, north-west and south-west. Given the topography and ground conditions at the Site, surface water runoff would be expected to infiltrate where conditions allow and flow overland to the west and north-east.

Wastewater and Potable Infrastructure

- 10.14 Southern Water records indicate that a public foul sewer, serving part of Adversane is present in the north-west of the Site. The sewer conveys domestic foul water from a number of dwellings to Adversane pumping station c. 235 m north of the Site.
- 10.15 Southern Water records indicate that a 300 mm diameter water main is present in the western part of the Site, running parallel with the railway line. Water mains are also present in the A29 Stane Street to the west and Adversane Lane (B2133) to the north.

Study Area

- 10.16 The study area for the assessment will include the Site and the associated downstream water features likely to be affected by the Development. The study area will cover 2 km from the Site as this represents the hydrological zone of influence. Receptors will also include those below ground including groundwater bodies.

Sensitive Receptors

- 10.17 At this stage, the receptors that have the potential to experience significant impacts and which will be considered within the assessment are as follows:
- Surface water and groundwater bodies, including the River Arun, ordinary watercourses, drainage ditches and existing ponds:

- Flood risk receptors, including existing and proposed buildings and infrastructure, site workers (during construction), and future site users and surrounding communities and businesses (completed development), new residents, visitors, employees and existing local residents (completed development);
- Wastewater and potable water infrastructure; and
- Regional water resources and supply capacity.

Scope of Assessment

Potential Significant Effects

- 10.18 The Development has the potential to result in the following impacts which could lead to significant effects:

Demolition and Construction

- Deterioration in surface water and groundwater quality arising from contaminated runoff and/or temporary changes to surface water drainage patterns and pathways;
- Increased risk of flooding to people, plant, adjacent roads and properties due to an increase in runoff due to soil compaction, temporary presence of impermeable areas and drainage disruption;
- Risk of flooding from watercourses and surface water to site workers; and
- Impacts on wastewater infrastructure associated with construction activities and new connections.

Completed Development

- Changes to groundwater levels and flow beneath the Site;
- Increased risk of flooding to people, adjacent roads and properties due to development or raising of ground levels within areas considered to be at risk of flooding and the subsequent displacement of floodwaters and flood storage;
- Increased surface water runoff (volume and rate) due to an increased impermeable area, leading to:
 - Changes in flow within existing watercourses; and
 - Deterioration in surface water runoff quality due to an increase in impermeable areas and traffic volumes.
- Changes to the surface water drainage regime and flow pathways across the Site and surrounding area;
- Increased risk of blockage to existing watercourses and drainage infrastructure leading to a change in flood flow dynamics and an increase in flood risk;
- Impacts on wastewater infrastructure capacity and potential pollution of receiving watercourses; and
- Increased demand for potable water supply.

Non-significant effects

- 10.19 Natural England officially withdrew its Position Statement on water neutrality for the Sussex North Water Supply Zone in October 2025. Consequently, new development proposals and planning applications are no longer required to demonstrate water neutrality or offset water consumption. Water consumption will be considered in the ES although a Nutrient Neutrality Assessment is not required.

Assessment Methodology

Baseline Characterisation Approach

Desk study

- 10.20 The desk-based study will be informed by a review of the following sources:
- Soilscales, Soil and AgriFood Institute, Cranfield University, www.landis.org.uk/soilscales;
 - National Geoscience Data Centre's Single Onshore Borehole Index, <https://www.bgs.ac.uk/products/onshore/SOBI.html>;
 - BGS Mapping of Surface Geology, <https://www.bgs.ac.uk/map-viewers/geindex-onshore/>;
 - MAGIC, Natural England, <https://magic.defra.gov.uk/MagicMap.html>;
 - Topographical Survey - Survey undertaken by Maltby Surveys Ltd in July 2017 and December 2025;
 - EA LiDAR, <https://environment.data.gov.uk/survey>;
 - EA Historic Flood Map, <https://data.gov.uk/dataset/76292bec-7d8b-43e8-9c98-02734fd89c81/historic-flood-map>;
 - EA FMfP, <https://flood-map-for-planning.service.gov.uk/>;
 - EA Long Term Flood Risk, <https://check-long-term-flood-risk.service.gov.uk/postcode>;
 - Local Flood Risk Management Strategy: 2025 - 2030, West Sussex County Council, July 2025;
 - Level 1 Strategic Flood Risk Assessment Update, Horsham District Council, September 2024;
 - Strategic Flood Risk Assessment, Horsham District Council, January 2020;
 - Preliminary Flood Risk Assessment, West Sussex County Council, May 2011; and
 - Southern Water asset data for foul and potable water infrastructure; and Site walkovers undertaken by Weetwood Services Ltd on 3 November 2025 and 5 February 2026.

Survey

- 10.21 A site survey is not proposed to be undertaken as the information collected/to be collected through the desk study review and site walkover (see above) is considered to be sufficient for informing the assessment.

Method

Demolition, Construction and Completed Development

10.22 To fully assess the effects of the Development the following will be undertaken:

- **Baseline review:** Collation and review of available data and information relating to surface water quality, flood risk and drainage conditions within and surrounding the Site;
- **Policy and guidance review:** Review of relevant legislation, policy and guidance, including that published by the Ministry of Housing, Communities and Local Government, Defra, the EA, CIRIA, and relevant regional and local authorities (including Strategic Flood Risk Assessments);
- **Consultation:** Engagement with key stakeholders, including the EA, WSCC (Lead Local Flood Authority), HDC and Southern Water (sewerage undertaker and water supply authority);
- **Water quality assessment:** Evaluation of potential impacts on surface water and groundwater bodies, including consideration of WFD quality elements;
- **Flood Risk Assessment (FRA):** Assessment of flood risk to the Site from all identified sources, and the potential effects of the Development on flood risk elsewhere;
- **Surface Water Drainage Assessment (SWDA):** Assessment of baseline drainage conditions and potential changes to the surface water regime arising from the Development, including the preparation of an outline drainage strategy incorporating sustainable drainage systems (SuDS); and
- **Foul Water Drainage Assessment (FWDA):** Preparation of a foul water drainage strategy for the Development, informed by consultation with Southern Water.

Assessment Criteria

- 10.23 The significance of any identified effect during the construction phase and as a result of the completed Development would be determined with regard to the status, extent or spatial scale, duration, probability/likelihood and magnitude of the impact and the sensitivity of the receptor.
- 10.24 The significance of the impact would be established through the evaluation of the above elements as informed by the baseline conditions and would ultimately be determined through professional judgement.
- 10.25 The need for any mitigation measures to address adverse effects or enhance positive effects would be considered as appropriate for the construction and operational phases of the proposed Development.

Approach to Mitigation

- 10.26 It is anticipated that potential effects on surface water, hydrogeology, flood risk, land drainage, wastewater and potable water arising from the Development will be mitigated

through a combination of embedded and additional measures implemented during both the construction and operational phases. These measures will be informed by the findings of the Flood Risk Assessment and supporting drainage strategies.

Demolition and Construction

- 10.27 During the demolition and construction phase, mitigation will focus on the control of runoff, prevention of pollution and management of temporary drainage conditions. Measures are expected to include:
- Implementation of best practice construction measures as set out within the Outline CEMP, including pollution prevention controls, sediment management and appropriate surface water management techniques in accordance with EA guidance;
 - Use of silt traps, settlement features and/or temporary drainage controls to prevent sediment-laden runoff entering watercourses;
 - Management of temporary drainage and overland flow pathways to avoid increasing flood risk during construction; and
 - Provision of sealed facilities for foul water generated by temporary welfare uses, with removal from site by a licensed contractor.

Completed Development

- 10.28 During the operational phase, mitigation will be delivered through the design of the Development, including:
- Setting finished floor levels above the design flood levels, with appropriate climate change allowance and freeboard;
 - Implementation of a surface water drainage strategy incorporating sustainable drainage systems (SuDS) to control runoff rates and volumes, manage exceedance flows and improve water quality;
 - Provision of a long-term management and maintenance regime for drainage infrastructure and watercourses;
 - Development of a foul water drainage strategy, in consultation with the sewerage undertaker, to ensure adequate capacity and appropriate management of foul flows; and
 - Incorporation of water efficiency measures to reduce potable water demand.
- 10.29 The proposed measures to mitigate flood risk and the strategy for the management of surface water runoff will be developed in accordance with national and local planning policy, guidance and technical standards, the requirements of the WFD and based upon professional experience and judgement. This will ensure that the Development will be safe from flood risk and will not increase flood risk elsewhere for its lifetime, taking climate change and the vulnerability of its users into account, with betterment provided where possible.

11 Landscape and Visual

Key Baseline Considerations

- 11.1 A Preliminary Key Views Analysis has been undertaken to inform the scope of the Landscape and Visual impact assessment, and this is provided in **Appendix 2**.
- 11.2 The Site and immediate area are not subject to any landscape quality designations. The South Downs National Park (SDNP) lies approximately 1.5km to the west, but there is no significant intervisibility between the Site and the SDNP because of the intervening topography and mature vegetation. The village of Adversane and its associated Conservation Area with listed buildings abuts the northwestern corner of the Site.
- 11.3 The settlement boundary of Billingshurst lies approximately 3km to the north. The northern boundary of the Site is formed partly by Adversane Lane (B2133) and the western boundary is formed by the A29 Stane Street. It comprises large to medium sized, gently undulating fields in agricultural use. Other land uses within the Site include the working Steepwood Farm buildings, Steepwood House and its parkland, several areas of woodland (some of which are designated as Ancient Woodland), a deer park area and several ornamental ponds. There are several drainage ditches draining from east to west and some ponds associated with the field boundaries. The Site is crossed in the west by the Arun Valley Line railway. The landscape context of the Site is gently undulating. Other land uses in the vicinity of the Site include Brinsbury College and Equine Centre, a plant nursery and the Hepworth Brewery.
- 11.4 Landscape Character Assessment has been undertaken by Natural England, WSCC and HDC. Within the WSCC Landscape Character Assessment (2005) the Site is located within Landscape Character Area LW5 'Southern Low Weald'. Within the HDC Landscape Character Assessment (2003) as Landscape Character Area J1 'Billingshurst and North Heath Farmlands'.
- 11.5 There is a network of existing PRoWs that run through the landscape; these predominantly cut through the open fields and along farm tracks. Steepwood Lane, a bridleway, cuts through the Site and connects Stall House Lane with Adversane Lane. Another PRoW passes along the eastern boundary of the Site, connecting to Gay Lane in the south.

Study Area

- 11.6 The Study area for the assessment will be up to 3km from the Site boundary but primarily focussing on an area within 1km of the Site. This study area has been determined based on the observations from several Site visits in both winter and summer months along with desk-based research and studies including an initial Zone of Theoretical Influence (ZTV) (refer to Appendix 2 - Preliminary Key Views Analysis for further details. The final study area will be informed by an updated ZTV which will be based on the maximum building heights and Parameter Plans.

Sensitive Receptors

- 11.7 At this stage, the receptors which have the potential to experience significant impacts will be considered within the assessment are as follows:

Landscape Receptors

- The local landscape character and its key components, including relevant landscape character areas and their key components such as topography, landform, built form, woodland, tree cover, movement corridors and open space; and
- The Site and its immediate setting, including its character and key components such as topography, built form, woodland, trees, hedgerows, waterbodies and open spaces.

Visual Receptors

- Users of PRow within, adjacent to and surrounding the Site, including routes from which views of the Development are available;
- Residential receptors, including nearby communities and properties with potential views of the Site;
- Users of transport corridors, including road and rail routes within the study area; and
- People at places of work, education and recreation within the area where views of the Site may be experienced.

Scope of Assessment

Potential Significant Effects - Demolition and Construction and Completed Development

- 11.8 The Development has the potential to result in the following impacts which could lead to significant effects during the demolition and construction stage and from the completed Development:

Landscape Effects

- Temporary and permanent changes to landscape character within the Site and its immediate setting, including alterations to key characteristics such as settlement pattern, built form, land use, vegetation structure and landscape pattern;
- Effects on the wider landscape, including relevant Landscape Character Areas (LCAs) and the relationship between built development and the surrounding rural or undeveloped landscape;
- Loss or alteration of landscape elements and features that contribute to character, including topography, woodland, trees, hedgerows, waterbodies, open spaces and movement corridors; and
- Effects on the setting, special qualities and perceptual attributes of designated landscapes, where these contribute to landscape value and character, including the South Downs National Park.

Visual Effects

- 11.9 Changes to the character and amenity of views experienced by identified visual receptors, including those set out in the Preliminary Key Views Analysis (Appendix 2).
- 11.10 Consideration will also be given to the potential for nighttime effects on landscape character.

Assessment Methodology

Baseline Characterisation Approach

- 11.11 The baseline and assessment approach will follow the procedures set out in the 'Guidelines for Landscape and Visual Impact Assessment', Third Edition (GLVIA3) published jointly in 2013 by the Landscape Institute and IEMA (now ISEP).
- 11.12 A landscape and visual appraisal of the Site has already been undertaken, informed by a desk-based study and Site visits. These will be updated as appropriate but included:
- Published landscape and planning material relevant to the Site. This includes review of the Initial Landscape Appraisal (Allen Pyke Associates, 2017 and updated in 2019) which accompanied the Applicants' Local Plan representations;
 - Initial ZTV of the proposed Development (based on a blanket building height of 15.5m above ground level);
 - Further site visits to undertake the baseline visual appraisal together with an assessment of local landscape character, taking representative photographs, identifying local character types, confirming the zone of visual influence and key receptors, and establishing any potential seasonal differences in views; and
 - Engagement with HDC Landscape Officer on detailed scope and approach to the assessment.
- 11.13 20 representative viewpoints have been proposed to assess the effects on visual receptors. These have been selected in publicly accessible locations and generally where the greatest potential effects are anticipated to be experienced. The viewpoint locations (as shown on Figure 5 in Appendix 2) have been agreed with the HDC Landscape Officer and represent a wide range of receptors, providing a 'sample' of the potential effects from the locality.
- 11.14 The Landscape and Visual Impact Chapter will be set out in two parts (Parts 1 and 2):
- 11.15 **Part 1** will identify the baseline conditions for the assessment and determine the sensitivity of landscape character areas and visual receptors to include the following:
- Relevant policy and legislative framework – strategic and non-strategic landscape planning policies and designations;
 - Landscape context and setting for the Site - landscape features, topography, PRoWs etc;
 - Landscape character assessment of the Site and its setting against the national/local context and, if required, provide a finer grain appraisal of local character to identify 'character pattern', 'condition' and 'value' of each character area;

- Assessment of on-site landscape features to identify 'character', 'condition' and 'value' of each feature' and merits of retention;
- Assessment of the visual relationship between the Site and the agreed surrounding visual receptors to identify 'receptor types', 'nature of each view' and the 'value of each view'; and
- Description of the 'susceptibility to change' and 'sensitivity' of each character area, landscape feature and visual receptor, which will include those who live, work and visit the Site or adjacent landscape.

11.16 **Part 2** will present receptor sensitivity with the predicted magnitude of change to determine the significance of landscape and visual effects, and identify whether these are beneficial, adverse or neutral in direction.

11.17 The assessment will consider effects at three key stages of the Development:

- Construction phase, representing the period of greatest temporary change and disturbance;
- Year 1 (winter), representing the completed development in a near-term scenario, including limited establishment of mitigation planting and reduced vegetative screening; and
- Year 15 (summer), representing a mature stage of the development when mitigation planting is established and long-term residual effects can be assessed.

11.18 This approach enables the assessment of both temporary and permanent effects, including the influence of seasonal variation and the likely effectiveness of mitigation over time. Cumulative effects with other relevant committed developments will be assessed separately at each stage.

11.19 A series of visualisations will be prepared to support the assessment, illustrating the proposed Development from representative viewpoints. These will be prepared in accordance with relevant best practice guidance and will be proportionate to the scale of likely effects. Details of the proposed approach to visualisations will be agreed with HDC.

Assessment Criteria

11.20 The following process will be used to determine the significance of effects:

- Describe the landscape proposals, landscape and urban design objectives and associated landscape mitigation treatments evolved during design development to minimise or avoid potential effects on landscape character, landscape features and visual amenity;
- Describe the potential effects and 'magnitude of change' for each local character area, site landscape feature and visual receptor to determine the 'significance' rating of each effect and its direction; and
- Describe and assess the cumulative effects on local character areas and visual receptors of the Development in combination with other cumulative schemes.

- 11.21 The assessment will adopt a precautionary ('worst-case') approach in determining effect significance. Where visual receptors include inaccessible private properties, assessment will undertake from the nearest publicly accessible viewpoint, supplemented by professional judgement to represent likely views from sensitive locations (e.g. upper storey windows and private amenity areas) where appropriate. Field survey work will generally take place in winter months, but where this is not possible the assessment will account for seasonal variation by assuming reduced screening during winter conditions, thereby reflecting a reasonable worst-case ZTV and associated effects.
- 11.22 The assessment of landscape character, landscape features and visual effects will be undertaken using defined criteria and professional judgement, supported by a structured methodology. Individual components will be assessed and categorised using a consistent scale (e.g. high, medium, low or substantial, moderate, minor, negligible), which are then combined to derive overall ratings of susceptibility, sensitivity and significance of effects.
- 11.23 Susceptibility to change will be derived by combining either: landscape character type and condition; or visual receptor sensitivity and the nature of the view using the matrix set out in Table 11.1.

Table 11.1: Landscape and Visual Susceptibility to Change

Character / Receptor Ranking	Landscape & Visual Susceptibility		
<i>High / Type A</i>	High	High	Medium
<i>Moderate / Type B</i>	High	Medium	Low
<i>Low / Type C</i>	Medium	Low	Low
	<i>Good / High</i>	<i>Moderate / Medium</i>	<i>Poor / Low</i>
	Condition / Nature of View		

- 11.24 Sensitivity to change will be determined by combining the value of the landscape or visual receptor with its susceptibility to change, as presented in Table 11.2.

Table 11.2: Sensitivity to Change

Landscape / Visual Value	Sensitivity to Change		
<i>Exceptional / High</i>	High	High	Moderate
<i>Moderate</i>	High	Moderate	Low
<i>Poor / Low</i>	Moderate	Low	Low
	<i>High</i>	<i>Medium</i>	<i>Low</i>
	Landscape / Visual Susceptibility		

- 11.25 The significance of landscape and visual effects will be determined through the combination of receptor sensitivity and the magnitude of change arising from the proposed Development, including the influence of embedded design measures and mitigation. This process is set out in Table 11.3.

Table 11.3: Significance of Effects

Sensitivity	Significance of effects			
<i>High</i>	Substantial	Substantial	Moderate	Minor / Neutral
<i>Moderate</i>	Substantial	Moderate	Minor	Neutral
<i>Low</i>	Moderate	Minor	Minor	Neutral
	<i>High</i>	<i>Medium</i>	<i>Low</i>	<i>Negligible/None</i>
	Magnitude of Change			

Effects will be identified as beneficial, adverse or neutral, having regard to the direction of change and the extent to which the proposed development affects existing landscape character or visual amenity. This judgement will be informed by a balanced consideration of the assessment criteria set out in Table 11.4.

Table 11.4: Quantifying the Direction of the Significance of Effects

Beneficial Criteria (+)	
▪ Fits well with scale of landform &/or pattern of an area / view ▪ Increases attributes or enhances in contribution to an area/setting / view ▪ Enhances balance of elements in an area/view or sense of tranquillity ▪ Provides ability to include adequate or appropriate mitigation ▪ Complements local/national planning policies or guidance to protect an area's character or a view	
Adverse Criteria (-)	
▪ Out of scale with landform &/or pattern of an area/view ▪ Loss of attributes or deterioration in contribution to an area/setting/view ▪ Disrupts balance of elements in an area/view or sense of tranquillity ▪ Lacks ability to include adequate or appropriate mitigation ▪ Conflicts with local/national planning policies or guidance to protect an area's character or a view	
Neutral	
▪ Where there is no discernible change to an area's character or a view ▪ Where there is no positive or negative affect on an area's character or a view	

Approach to Mitigation

Demolition and Construction

- 11.26 Measures to protect retained landscape features and minimise temporary adverse effects on landscape character and visual amenity during demolition and construction will be secured through standard good practice. These measures will be set out within the Outline CEMP and will include, as appropriate:
- Installation of tree protection fencing in accordance with relevant standards;
 - Use of site hoarding and screening to limit visual intrusion;
 - Careful siting and management of construction compounds, storage areas and access routes; and
 - Implementation of best practice measures to minimise disturbance to soils, vegetation and landscape features.

Completed Development

- 11.27 Mitigation will be primarily delivered through embedded design measures, secured through the detailed design (detailed component), parameter plans and accompanying Strategic Design Cde (outline component) informed by the LVIA. The design of the Development will respond to the local landscape context and character, including:
- Retention and protection of key landscape features, such as mature trees and hedgerows, wherever practicable;

- Careful control of the extent, form and distribution of built development, including maximum building heights, informed by the findings of the LVIA;
- Delivery of a robust green infrastructure framework to provide visual containment and integration of the development within the surrounding landscape; and
- Provision of multifunctional landscape features, delivering benefits for landscape character, biodiversity, recreation and climate resilience.

11.28 This will include structural landscape planting, comprising native woodland, hedgerows and tree belts, to reinforce landscape structure and filter views of the development over time.

11.29 An Outline LEMP will accompany the planning application. This will set out the principles for the long-term establishment, management and maintenance of landscape and ecological features, ensuring that the green infrastructure are successfully delivered and function as intended over the lifetime of the Development.

12 Biodiversity

Key Baseline Considerations

- 12.1 Baseline ecology surveys are ongoing, with surveys commencing in July 2025 to inform the evolving masterplan.

Designated Sites

- 12.2 There are no statutory or non-statutory nature conservation sites within or adjacent to the Site. Five internationally designated sites lie within 10km of the Site as shown on Figure 12.1 including:
- The Mens SAC – c. 2.5 km west of Site. Annex I habitat – Atlantic acidophilous beech woodland. Annex II qualifying species – Barbastelle bats.
 - Arun Valley SAC / SPA / Ramsar – c. 4 km south of Site. Annex II species – Ramshorn snail. 1.6% of the UK population of Bewick's swan *Cygnus columbianus bewickii* and regularly used by over 20,000 waterfowl. The site is of outstanding ornithological importance for wintering waterfowl and breeding waders.
 - Ebernoe Common SAC – c. 7.74 km west of Site. Annex I habitat - Atlantic acidophilous beech woodland. Annex II qualifying species – Barbastelle and Bechstein's bats.
- 12.3 Eight nationally important SSSIs lie 5km of the Site; the closest comprising the Upper Arun SSSI, c. 2km west of the Site, which is designated for assemblages of breeding dragonflies including a number of rare species and diverse riverine flora. Figures 12.1 and 12.2 show the location of international and national designated sites.
- 12.4 The Site lies within multiple Impact Risk Zones (IRZ) for designated sites, including The Mens SAC / SSSI, Arun Valley SAC / SPA / Ramsar, and Upper Arun Valley SSSI. The Site at c. 2.5km east of the The Mens SAC and c. 7.74 km from Ebernoe Common SAC, and therefore falls within the defined 6.5 km Key Conservation Area of The Mens SAC and within the 12 km Wider Conservation Area of the Ebernoe Common SAC as defined within the Sussex Bat SAC Protocol⁵³ (SDNPA/NE joint guidance). As such, habitats within and surrounding the Site may function as supporting foraging and commuting habitat for SAC bat populations and will require consideration within the HRA process.
- 12.5 There are 16 non-statutory sites of local importance, including 14 Local Wildlife Sites (LWS) and two Designated Road Verges (DRV); the closest comprising the Northwood Farm Fen and Brinsbury College LWS located c.500m west of the Site.

⁵³ South Downs National Park Authority / Natural England (2017). *Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol*. Final Draft.

Figure 12.1: International Ecological Designated Sites

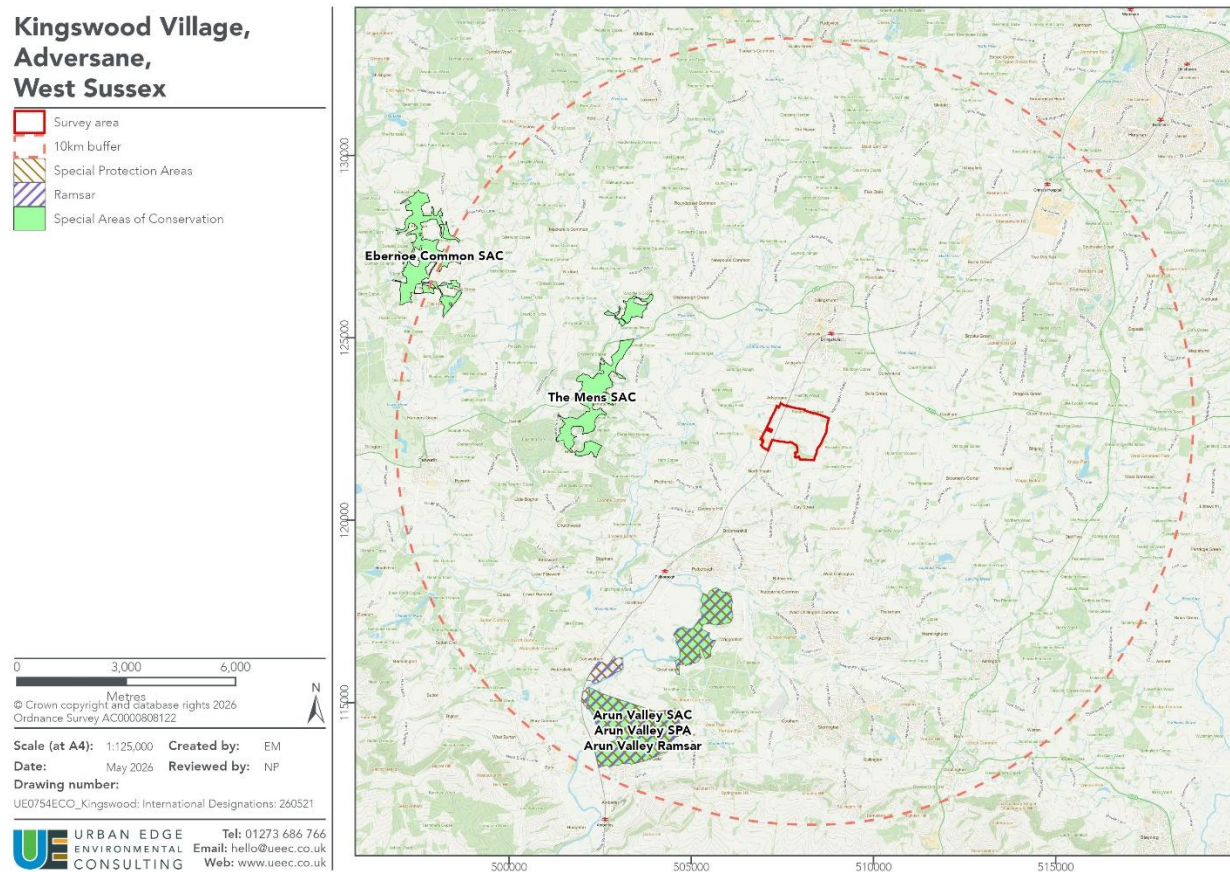
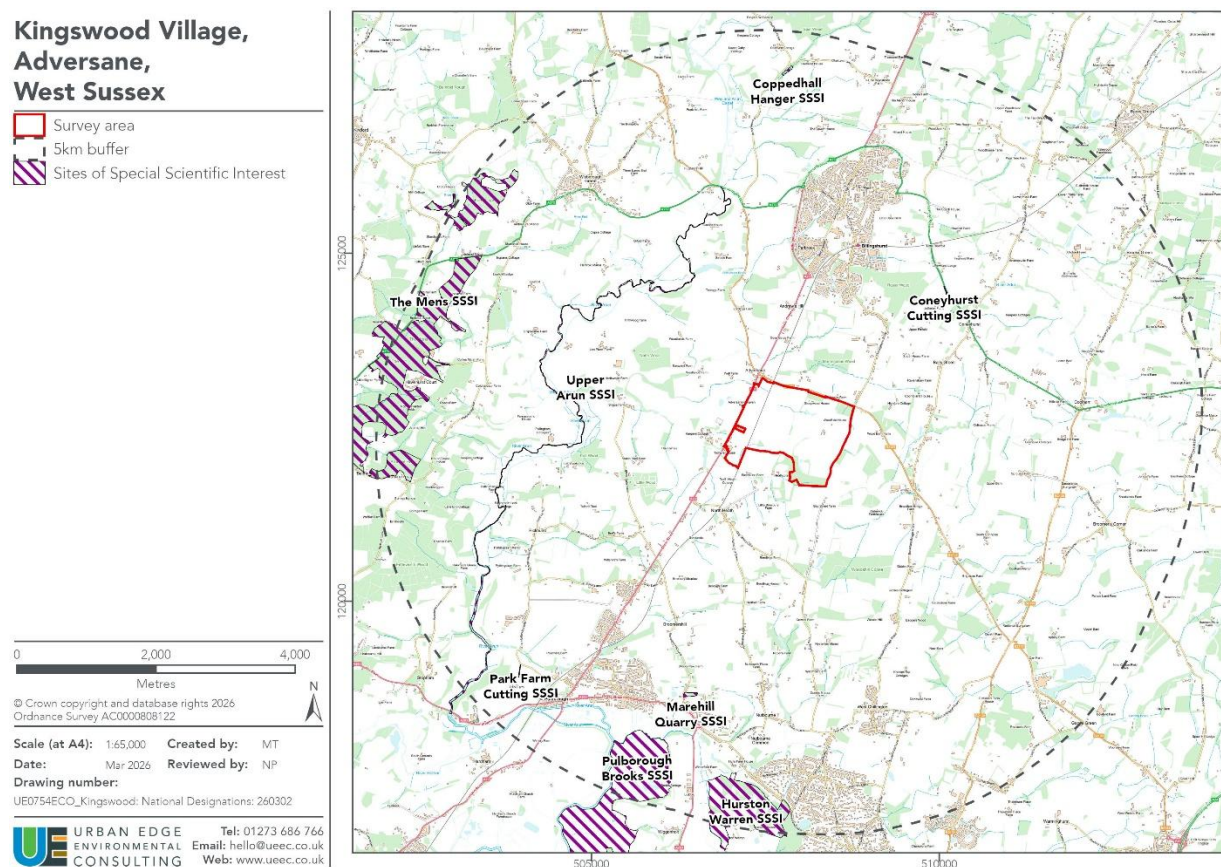


Figure 12.2: National Ecologically Designated Sites



12.6 Ecological surveys are ongoing, although desk-based studies and surveys to date show the Site supports or has potential to support a range of protected and notable fauna:

- **Amphibians** - Records of common amphibians and Great Crested Newt (GCN) are present in the wider area. Suitable terrestrial habitat for GCN are present on Site;
- **Birds** - Records of notable breeding species within the wider area. On-site habitats provide suitability for Priority Species (e.g. dunnoek, skylark, dunnoek, lesser spotted woodpecker, cuckoo and nightingale) and Schedule 1 species (e.g. barn owl). There is limited suitability for overwintering bird assemblages, although woodland habitats may support common wintering species.
- **Bats** - At least 13 species recorded in the wider area, including Barbastelle. The Site is c. 2.5 km east of The Mens SAC. Some buildings and numerous trees within the Site have potential for roosting bats. Surveys to date confirm use of the Site by species including brown long-eared, pipistrelle and serotine. The Site also includes a well-connected network of woodland and hedgerows providing high-quality foraging and commuting habitat, including potential links to nearby SACs.
- **[REDACTED]**
- **Dormouse** - Suitable habitat is present within the Site (connected woodland and hedgerows).
- **Reptiles** - Widespread species are recorded locally and suitable habitat is present across the Site for common species.
- **Water vole / otter** - Suitable ditch habitat is present within the Site for water vole. Habitats offers limited suitability for otter.
- **Invertebrates** – the Site has moderate potential overall, with higher value habitat including woodland, hedgerows, ponds and less improved habitats. Habitat is also suitable for notable species such as brown hairstreak.
- **Other protected, rare or notable species** - Records of hedgehog, brown hare, harvest mouse, pole cat and Eurasian red squirrel were returned from within the desk-study search zone. The Site contains habitats suitable for these species, including grassland, woodland, hedgerow and scrub.
- **Flora** - The Site is generally of limited botanical interest due to intensive management, although Bluebell is recorded within the woodland. Other notable species may be present in less improved habitats.

12.7 The Site is largely dominated by habitats subject to intensive farming practices. The western extent includes a series of large open croplands, with cattle / horse-grazed pasture forming the north-western boundary and an equestrian centre in the south-west. The south / east includes a large deer park, surrounded by a series of agricultural fields containing grassland crops and further areas of cattle pasture. Croplands, improved and poor semi-improved grasslands equate to an area of approximately 138 ha.

12.8 Notable habitats within the landscape include large areas of woodland. Approximately 28ha of Lowland Mixed Deciduous Woodland was recorded (a Habitat of Principal Importance (HPI)⁵⁴), of which c.11ha comprises irreplaceable Ancient Woodland. The larger extents of

⁵⁴ Natural Environment and Rural Communities Act 2006

woodland fall along the Site boundaries with narrower sections separating fields within the Site.

- 12.9 The Site contained an extensive hedgerow network equating to over 8.5km, including 34 linear features. They typically comprised of native woody species, often species rich and incorporating mature trees, with some supporting ditches. The vast majority of hedgerows within the Site were considered to qualify as HPI.
- 12.10 In addition to trees located within hedgerows, distinct tree lines and individual specimens are present throughout the Site. In addition to the biodiversity value provided by the corridors of habitat formed by hedgerows / tree lines, a number of the trees on-site were considered likely to be Veteran trees during the walkover survey. Veteran trees are both irreplaceable and of high intrinsic ecological value.
- 12.11 Four parcels of grasslands were considered to provide a greater biodiversity due to their more semi-natural, less managed / improved nature. This mostly comprised of neutral grassland, but one area in the south-east included species typical of wet acid grassland. None of these grasslands are anticipated to qualify as HPI, but the survey was carried out in mid-summer following a period of drought, with the grasslands unlikely to have been at their best.
- 12.12 Seven ponds and four ditches were recorded on Site. None were considered to qualify as HPI and most held very little water, if any during the site survey. However, this was following a period of drought.
- 12.13 Pockets of mixed scrub and tall forbs were often found at field edges, providing small areas of structural diversity within the largely intensely managed landscape. Urban habitats recorded including developed land and residential gardens provide little intrinsic value, but may support protected species.

Study Area

- 12.14 The desk study search areas have been defined with reference to the Zone of Influence (Zoi) of the Development, in accordance with CIEEM guidance. The Zoi reflects the extent over which ecological features may be affected by impact pathways associated with the scheme, recognising that this varies depending on the nature of the receptor and impact.
- 12.15 To ensure a precautionary and proportionate assessment, the following desk study search radii have been applied:
- 10km for sites of international importance (SACs, SPA, Ramsar sites), noting some sites may also be SSSIs;
 - 5km for sites of national or regional importance (National Nature Reserves, SSSIs); and
 - 5km for sites of District and County importance (LWS) and other important habitats (e.g., NERC S41 Priority Habitats); and
 - 5km for species records (e.g., legally protected, NERC S41 Species of Principal Importance protected and other notable species).

- 12.16 Detailed species-specific surveys commenced at the Site in 2025 and are ongoing. The survey area for the more detailed surveys based on each individual survey requirement and particularly the potential Zol relevant to any potential adverse impact.

Significant Important Ecological Features

- 12.17 At this stage, the Important Ecological Features (IEF) which have the potential to experience significant impacts and which will be considered within the assessment are as follows:
- Internationally designated sites and their qualifying features, such as The Mens SAC, Arun Valley SAC / SPA / Ramsar (and associated SSSIs) and Ebernoe Common SAC;
 - The Upper Arun SSSI;
 - Irreplaceable Ancient Woodland and Veteran Trees within the Site and within 200m of the affected road network;
 - HPI within the Site such as Lowland Mixed Deciduous Woodland and Hedgerows;
 - Other notable habitats, such as acid grassland, ponds, ecologically valuable tree lines and individual (non veteran) trees;
 - Great crested newt;
 - Breeding birds;
 - Invertebrates;
 - [REDACTED]
 - Bats (roosting, foraging and commuting habitat);
 - Hazel dormouse;
 - Water vole;
 - Reptiles; and
 - Other protected, rare or notable species, such as hedgehog and brown hare.
- 12.18 The desk study search areas have been defined with reference to the Zone of Influence (Zol) of the Development, in accordance with CIEEM guidance. The Zol reflects the extent over which ecological features may be affected by impact pathways associated with the scheme, recognising that this varies depending on the nature of the receptor and impact.

Scope of Assessment

Potential Significant Effects

- 12.19 The Development has the potential to result in the following impact pathways during the construction stage which could result in significant effects:
- Potential effects on designated sites, including The Mens SAC, Ebernoe Common SAC, Arun Valley SAC/SPA/Ramsar (and associated SSSIs), and Upper Arun SSSI arising from:
 - air pollution (including dust and road traffic emissions from construction vehicles);
 - changes to hydrological regimes and water quality; and

- indirect impacts on supporting habitats within the Zol.

- Potential effects on SAC bat populations via changes to functionally linked habitat, including: degradation or loss of foraging habitat; fragmentation or severance of commuting routes; and increased artificial lighting affecting dark corridors;
- Loss or deterioration of irreplaceable habitats, including Ancient Woodland and Veteran Trees, through direct land take, root protection area incursion, or indirect effects (e.g. edge effects, compaction or pollution);
- Loss or degradation of Priority Habitats (HPI), including Lowland Mixed Deciduous Woodland and Hedgerows, through direct removal, severance or construction-related disturbance;
- Direct habitat loss and modification affecting habitats that support protected and/or notable species;
- Risk of injury or mortality to protected and notable species (e.g. bats, great crested newt, breeding birds, [REDACTED] hazel dormouse, reptiles and water vole) during site clearance and construction activities;
- Disturbance to fauna arising from noise, vibration, lighting and human activity, including disturbance to roosting, breeding or resting sites;
- Fragmentation and severance of habitats and ecological corridors, affecting movement and ecological connectivity;
- Indirect effects on habitats and species, including changes in habitat quality (e.g. dust deposition, pollution or hydrological change); and
- Introduction and/or spread of invasive non-native species (INNS) during construction activities.

12.20 The Development has the potential to result in the following impacts during the completed Development stage which could lead to significant effects:

- Potential effects on designated sites, including The Mens SAC, Ebernoe Common SAC, Arun Valley SAC/SPA/Ramsar (and associated SSSIs), and Upper Arun SSSI arising from:
 - air pollution (including atmospheric nitrogen deposition from road traffic);
 - changes to hydrological regimes, including water levels, flows and water quality; and
 - loss, degradation or fragmentation of functionally linked habitat supporting European sites;
 - indirect impacts on supporting habitats within the zone of influence; and
 - recreational pressure (where relevant - not identified as a key pathway).
- Potential effects on SAC bat populations via changes to functionally linked habitat, including: degradation or loss of foraging habitat; fragmentation or severance of commuting routes; and increased artificial lighting affecting dark corridors;
- Disturbance to irreplaceable habitats, including Ancient Woodland and Veteran Trees, arising from road traffic emissions, increased recreational use, trampling, or edge effects;

- Long-term disturbance to protected and notable species, particularly from artificial lighting, human activity and domestic pressures (e.g. pets);
- Degradation of Priority Habitats, including woodland and hedgerow networks, through increased recreational use, fragmentation or changes in management;
- Introduction and spread of invasive non-native species, including via garden planting and disposal of garden waste; and
- Indirect, long-term changes to habitat condition and ecological connectivity, including urbanisation effects (e.g. lighting, noise and edge effects).

Non-Significant Effects

12.21 The following effects are scoped out on the basis of available desk study information and field survey evidence, and in the absence of any evidence of sensitive receptors or credible impact pathways. These conclusions will be kept under review as additional survey data becomes available.

- Effects on other statutory and non-statutory nature conservation sites - due to their distance from the Site;
- Loss of habitats of low value to biodiversity – e.g. arable croplands and improved grasslands (whilst low valuable habitats, where a particular species favours this habitat, effects on such species will be fully assessed);
- Qualifying bird species for the Arun Valley SPA - Based on the distance from the Arun Valley SPA, the nature of intervening land, field size and enclosure, and the absence of habitat types typically associated with SPA qualifying bird use, the Site is not considered to be suitable functionally linked land. This conclusion is supported by desk study data and field survey evidence.
- Otter – It is considered unlikely that otter will be present within or adjacent to the Site. The nearest riparian habitat is located at least 10m from the south-western boundary, beyond an area of shortly grazed pasture. This section of river resembles an infrequently inundated ditch with little foraging and commuting suitability for otter.

Assessment Methodology

Baseline Characterisation Approach

Desk study

12.22 The desk-based study will be informed by a review of the following sources:

- The 'MAGIC' (Multi-agency Geographic Information for the Countryside) website, including Natural England Open Data;
- Sussex Biological Records Centre;
- Woodland Trust. Ancient Tree Inventory⁵⁵;

⁵⁵ Woodland Trust (2026) *Ancient Tree Inventory*. Available at: <https://ati.woodlandtrust.org.uk> (Accessed: 21 May 2026).

- Horsham Nature Recovery Network Report⁵⁶; and
- Horsham Draft Local Plan Habitats Regulations Assessment.

Survey

12.23 Baseline conditions within the Site will be determined using a combination of the following data sources and surveys:

- Preliminary Ecological Appraisal (July 2025);
- Great crested newt Habitat Suitability Index and eDNA surveys (April / May 2026);
- Arboricultural survey;
- Hedgerow Regulations surveys; (May-June 2026)
- Breeding bird surveys (April-June 2026);
- [REDACTED]
- Invertebrates scoping survey (February 2026);
- [REDACTED]
- [REDACTED]
- Bats - Ground Level Tree Assessment (February 2026); Aerial tree inspection for roosting bats (where required) (May-August 2026); Preliminary Roost Assessment (February 2026); Bat emergence surveys on buildings (May-August 2026); Bat activity surveys (August 2025-July 2026);
- Hazel dormouse surveys (April to November 2023);
- Water vole surveys (May & September 2026); and
- Reptile surveys (April / May 2026).

Method

12.24 The first step is to determine which ecological features (habitats, species, ecosystems and their functions / processes) are important (known as Important Ecological Features (IEF)). This will be informed and focussed in response to the results of surveys listed at paragraph **Error! Reference source not found..** IEFs should then be subject to detailed assessment if they are likely to be impacted by the Development. It is not necessary to carry out detailed assessment of features that are sufficiently widespread, unthreatened and resilient to project impacts such that there is no risk to their viability.

12.25 Ecological features can be important for a variety of reasons and the rationale used to identify importance is explained below. Importance may relate, for example, to the quality or extent of designated sites or habitats, to habitat/species rarity, to the extent to which they are threatened throughout their range, or to their rate of decline.

⁵⁶ Horsham District Council (2021) *Horsham District Nature Recovery Network report*. Available at: <https://www.horsham.gov.uk/climate-and-environment/climate-action-across-the-district/wilder-horsham-district/horsham-district-nature-recovery-networks/horsham-district-nature-recovery-network-report> (Accessed: 21 May 2026).

12.26 The geographical framework for assigning ecological importance follows CIEEM guidance, recognising the value of ecological features at international, national, regional (county), district and local scales, as follows:

- International and European e.g. SAC, SPA and Ramsar sites;
- National (England) e.g. SSSI and NNRs;
- County (West Sussex) e.g. LWSs, Local Nature Reserves, ancient woodlands;
- District (Horsham District) e.g. species rich and / or extensive habitats, or moderate population sizes, or species assemblages of moderate to high diversity; and
- Local (Billingshurst Civil Parish) e.g. common and widespread species with relatively moderate populations or assemblages of relatively limited diversity; and
- Negligible - Habitats or species populations were either:
 - not detected on Site;
 - the potential for them to be present is negligible; or
 - the habitat / species is present, but its presence is considered insignificant in relation to the local context of Billingshurst Civil Parish.

Impact assessment

12.27 The impact assessment follows a structured process comprising:

- identification and characterisation of impacts arising from the Proposed Development;
- application of the mitigation hierarchy (avoidance, mitigation and compensation), where required;
- assessment of residual effects following the implementation of mitigation and compensation measures; and
- identification of opportunities for biodiversity enhancement.

12.28 The assessment will identify both: the likely significant effects in the absence of mitigation; and the residual effects following mitigation. Whilst only significant residual effects are required to be reported in detail, the pre-mitigation assessment provides an important basis for identifying appropriate and proportionate mitigation measures.

12.29 The assessment will describe those characteristics of impacts that are relevant to understanding the ecological effect and determining its significance. It will consider, as appropriate: direct, indirect, secondary and cumulative impacts and whether the impacts and their effects are short, medium, long-term, permanent, temporary, reversible, irreversible, positive or negative. The assessment of impacts will then take into account the baseline conditions to describe how baseline conditions within the zone of influence will change as a result of the proposed Development and associated activities.

Characterising and quantifying impacts

12.30 The term 'impact' is defined as a change resulting from the Development activities, e.g. habitat loss, disturbance or changes to environmental conditions.

- 12.31 The CIEEM guidelines state that ecological impacts and effects should be characterised in terms of ecosystem structure and function and reference should be made, as required, to: positive, negative or neutral effects; extent; magnitude; duration; frequency and timing; reversibility; and cumulative effects. The guidelines provide a list of 'aspects of ecological structure and function to consider when predicting impacts and effects'.

Determining significant effects

- 12.32 The term 'effect' relates to the outcome of an impact, e.g. change in population size or conservation status due to habitat loss.
- 12.33 Following impact characterisation, the significance of effects will be evaluated with reference to the importance of the affected ecological feature and the nature of the effect. Significant effects are those that: affect the integrity or conservation status of a habitat or species population at a defined geographic scale; and/or affect the structure and function of a site, habitat or ecosystem. The geographic scale at which a feature is important (e.g. local, district, county) provides the context for determining the significance of the effect.
- 12.34 For the purposes of this assessment, a significant effect is one that is sufficiently important to influence decision-making, by either supporting or undermining biodiversity conservation objectives for identified IEFs. Consistent with CIEEM guidance, a significant effect does not necessarily preclude development, and may be acceptable where the mitigation hierarchy has been appropriately applied.
- 12.35 The assessment of significance is based on professional judgement, informed by established criteria where available and relevant (e.g. for air quality effects).

Cumulative Effects

- 12.36 Cumulative effects will be assessed where there is potential for the Development to interact with other plans or projects to give rise to effects that are significant in combination. This will be undertaken with reference to identified ecological receptors and established zones of influence.

Biodiversity Net Gain

- 12.37 Biodiversity Net Gain (BNG) calculations will be undertaken using the UK-wide industry accepted metric, the Natural England Statutory biodiversity metric published in 2023. This provides a transparent and robust quantitative measure of biodiversity change.

Information to Inform Habitats Regulation Assessment

- 12.38 The Applicant will provide a project-level Shadow HRA report to assess the potential for likely significant effects from the Development (alone and in combination with other plans and projects). The purpose of the Shadow HRA will be to provide information to inform HDC's Appropriate Assessment. The Shadow HRA would consider all relevant impact pathways for likely significant effects as identified in the Draft Local Plan HRA reports, including:
- Water resources: quantity, levels and flows, water quality - Arun Valley SPA/Ramsar;
 - Loss of functionally linked land - Ebernoe Common SAC and The Mens SAC (Annex II bat species);

- Air quality / atmospheric nitrogen deposition;

Approach to Mitigation and Enhancement

- 12.39 Where potentially significant effects are identified, the mitigation hierarchy will be applied in accordance with CIEEM guidance and relevant policy. This comprises a sequential approach of: avoidance of impacts where practicable; implementation of mitigation measures to reduce unavoidable impacts; compensation for any residual adverse effects; and incorporation of enhancement measures. Following the application of avoidance, mitigation, compensation and enhancement measures, the significance of residual effects will be assessed.
- 12.40 Mitigation and compensation measures will be designed to be proportionate to the geographical scale at which a receptor is determined to be important. For example, where an effect on a species population is assessed as significant at a county scale, mitigation and/or compensation will seek to maintain the integrity of that population at a county scale. This principle will be applied consistently across all ecological receptors.
- 12.41 The assessment will also identify and address relevant legislative requirements, including those relating to protected species and invasive non-native species. Where required, appropriate licensing and compliance measures will be identified.

Demolition and Construction

- 12.42 Control of effects during the construction phase through industry good practice measures within the Outline CEMP to limit direct mortality, noise/visual disturbance (including lighting); habitat degradation and pollution.

Completed Development

- 12.43 Retention and enhancement of IEFs and key ecological corridors, e.g. woodland, ponds, and hedgerows, as far as practicable;
- Landscape-scale mitigation and enhancement which is consistent with the objectives and targets of the draft West Sussex Local Nature Recovery Strategy, including landscape planting and green infrastructure;
 - Provision of strategic open space to alleviate recreational pressure on designated sites and habitats of ecological value, with more vulnerable areas within the Site protected from recreational pressure (e.g. ancient woodland);
 - Appropriate mitigation for breeding birds, including farmland species;
 - Buffers around sensitive habitats, such as ditches, ponds woodland and hedgerows;
 - Management of retained and new habitats in accordance with an Outline LEMP;
 - Enhancements for protected and Priority or threatened species; and
 - Sensitive lighting design, including dark corridors.

Limitations

- 12.44 The IEFs selected and subsequent impacts and effects have been based upon baseline surveys to date (May 2026) and professional judgement. However, the incomplete data set

currently available which informs the status of IEFs and the impacts / effects which may occur, will be updated and robustly informed once the surveys have been completed.

13 Cultural Heritage

Key Baseline Considerations

- 13.1 A site visit was undertaken in December 2025 and an Archaeological Desk Based Assessment and Heritage Statement prepared to inform scoping, informed by the West Sussex Historic Environment Record (HER). An initial buffer of 1km from the Site boundary has been applied as this is considered suitable to place heritage assets within an appropriate context and to accurately assess likely significant direct and indirect effects to cultural heritage likely to arise from the Development. A geophysical (magnetometry) survey⁵⁷ has also been carried out across the accessible areas of the Site to characterise the archaeological potential within the Site.

Built Heritage

- 13.2 There are no designated built heritage assets within the Site boundary. Within the 1km study area beyond the Site boundary there are 26 listed buildings or structures all of which are Grade II listed. Nine of these Grade II listed buildings or structures located in Adversane Conservation Area which is located immediately adjacent the north-west corner of the Site boundary.
- 13.3 Steepwood Historic Farmstead (MWS13659) is located within the Site. The farmstead buildings are not listed but have the potential to be considered as non-designated built heritage assets.
- 13.4 Oakleigh, a detached dwelling that likely dates to the late 19th century is located on the northern boundary of the Site. This building is not listed or recorded in the HER, although due to its likely date of construction has the potential to be considered as a non-designated built heritage asset.
- 13.5 Beyond the 1km study area, Conservation Areas are designated in towns and villages including Billingshurst, Pulborough and Wisborough Green.

Archaeology

- 13.6 The closest Scheduled Monument to the Site is Pallingham Manor (NHLE Ref: 1005849), c. 970 m southwest of the Site. The Site is located within a West Sussex Archaeological Notification Area (ANA) denoted for evidence of prehistoric, lithic working and mine pits, as well as later medieval and post medieval farmsteads and industrial activity (DWS8561).
- 13.7 The HER records a number of non-designated archaeological heritage assets within the Site boundary. Two of these relate to prehistoric flint finds. Similar Prehistoric findspots are also recorded in the landscape surrounding the Site.

⁵⁷ This is a non-intrusive method of surveying which measures variations in the Earth's magnetic field to detect buried features such as archaeological remains

- 13.8 The course of the Stane Street Roman road is recorded within the western part of the Site, where it runs southwest to northeast and forms the Site's western boundary. Although archaeological evidence associated with roadside settlement and other activities would be expected in the areas adjacent to the road, trial trenching on its eastern side did not reveal any such remains (EWS1069). Similarly, the recent geophysical survey did not identify any anomalies of considered Roman date within these areas of the Site.
- 13.9 Two post medieval farmsteads are recorded within the Site at Steepwood Farm in the east of the Site (MWS13659) and at West Chiltington in the southern part of the Site (MWS12789). Steepwood Farm is of probable medieval origins, based on documentary evidence from this time. A post medieval limekiln (MWS200) and a glasshouse (MWS6613) are also recorded at Steepwood Farm in the central and southeastern parts of the Site, respectively. Geophysical surveys indicate these may survive below ground.
- 13.10 There are no assets of modern date recorded by the HER in the Site. The HER records the approximate location of a World War II aircraft crash site (MWS15530), c. 330m east of the Site although it is unlikely that any remains of this plane will be present within the Site.
- 13.11 Historic Landscape Characterisation (HLC) covers and characterises the Site, where Beedings Copse in the southeastern part of the Site comprises a small area of medieval ancient semi-natural woodland (HWS862) and a larger area of modern broadleaved plantation dating to the early 20th century. Two areas of woodland are located in the northern part of the Site, adjacent to Adversane Lane. The area towards Adversane is described as medieval assart wood and ponds. The area of woodland in the north-east corner of the Site is described as regenerated woodland (HWS2905).
- 13.12 A review of historic mapping depicting the Site shows limited changes and that it was mostly in agricultural use from at least as early as the post medieval period.
- 13.13 Figures 13.1 and 13.2 present the designated and HER heritage assets within 1km of the Site boundary.

Figure 13.1: Historic Environment Record (HER) Heritage Assets (1km from the Site)

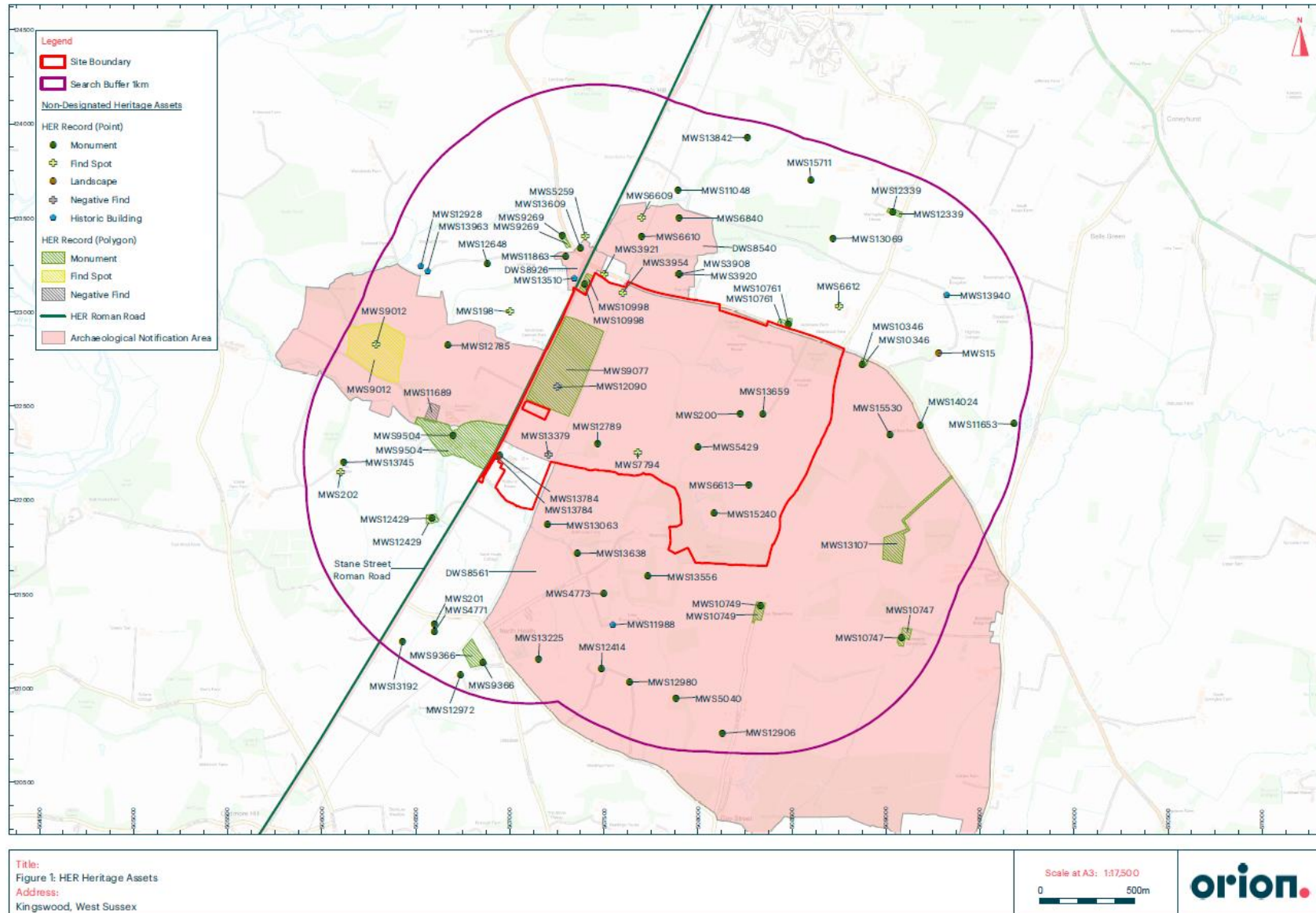
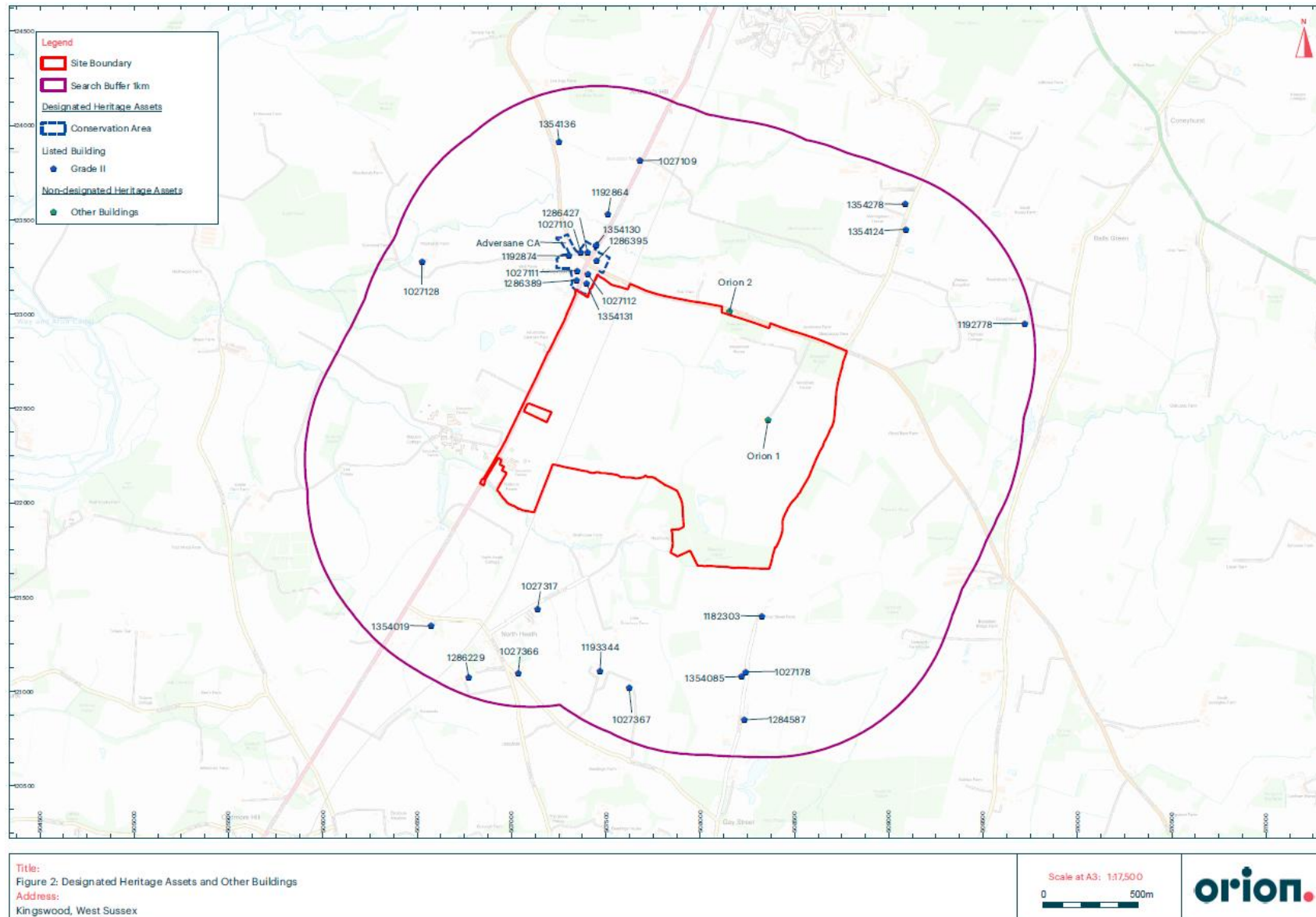


Figure 13.2: Designated Heritage Assets and Other Buildings



Study Area

- 13.14 While there is no prescribed statutory distance for defining study areas, a 1 km buffer is widely used in early-stage assessment as it provides an appropriate spatial context for identifying designated and non-designated heritage assets whose significance may be affected by the Development. This extent is sufficient to capture assets with potential for direct physical impact, as well as those where changes to setting could give rise to indirect effects. The study area will be refined, where necessary, during detailed assessment to reflect the specific sensitivities, visibility, and significance of individual heritage assets.

Sensitive Receptors

Built Heritage

- 13.15 At this stage, the following heritage receptors are considered to have the potential to experience significant effects arising from the Development and will therefore be taken forward for detailed assessment:
- Adversane Conservation Area. The designation includes several Grade II listed built heritage assets namely; Grigg's Farmhouse (NHLE 1354131); Stane Street Cottages (NHLE 1027112); The Old House (NHLE 1286395); Wayside (NHLE 1354130); Southlands Farmhouse (NHLE 1286427); Barn to South West of Southlands Farmhouse (NHLE 1027110); Juppsland Farmhouse (NHLE 1192874); The Blacksmiths' Arms Inn (NHLE 1027111); Sayers Farmhouse (NHLE 1286389). The potential for changes to the character and appearance of the Conservation Area, and to the settings of its constituent listed buildings, warrants detailed consideration.
 - Orion 1 – Steepwood Historic Farmstead (MWS13659) – An unlisted but recorded historic farmstead with potential sensitivity to changes in its rural setting; and
 - Orion 2 – Oakleigh – An unlisted historic building where the Development may give rise to setting-related effects.
- 13.16 All other designated and non-designated built heritage assets within the study area will be reviewed in the ES chapter to confirm whether any additional receptors may experience significant effects. Assets with no plausible pathway for impact will be scoped out at the ES stage with justification.

Archaeology

- 13.17 At this stage, the receptors which have the potential to experience significant impacts and which will be considered within the assessment are as follows:
- Post medieval limekiln at Steepwood Farm (MWS200);
 - Post medieval glasshouse at Steepwood Farm (MWS6613);
 - Any previously unidentified archaeological remains associated with settlement along Stane Street Roman road; and
 - Any previously unrecorded Prehistoric lithic artefacts, as per those recorded in the Site by the WSHR (MWS7794; 3954).

- 13.18 All other known archaeological assets within the study area will be reviewed as part of the ES chapter to confirm whether any additional receptors may experience significant effects. Assets with no plausible impact pathway will be scoped out at the ES stage with clear justification.

Scope of Assessment

Potential Significant Effects

Demolition and Construction

- 13.19 The Development has the potential to result in the following impacts during the construction stage which could lead to significant effects:

- Direct physical impacts:
 - Ground reduction, site clearance and enabling works that may disturb or remove archaeological deposits.
 - Excavation for foundations, services, attenuation features or re-profiling.
 - Piling or ground-improvement works causing localised disturbance or fragmentation.
 - Temporary or permanent land-take affecting known or potential archaeological remains.
- Hydrological and geotechnical impacts
 - Dewatering or changes to groundwater conditions leading to desiccation of waterlogged deposits.
 - Raising site levels or introducing made ground, altering soil conditions and preservation.
- Indirect construction-stage impacts
 - Vibration, noise, dust and artificial lighting affecting the setting or fabric of heritage assets.
 - Temporary construction compounds, haul routes, hoarding and welfare facilities altering ground conditions or heritage settings.

Completed Development

- 13.20 During the completed development stage, the Development has the potential to give rise to the following impact types, which may result in significant effects on cultural heritage receptors:

- Changes to the rural setting for designated and non-designated built-heritage assets, arising from the introduction of new built form and associated activity. The heritage assets to be considered in this assessment will be informed by the outcome of traffic and noise modelling, and the final ZTV once available;
- Increases in noise, lighting and traffic-related disturbance, potentially affecting the setting, character or experience of nearby heritage assets;

- Changes to key views into, out of, or across the Adversane Conservation Area, and views contributing to the significance of designated and non-designated buildings; and
- Alteration of groundwater conditions, which may affect the preservation of waterlogged or deeply buried archaeological deposits.

Non-Significant Effects

- 13.21 The following potential effects are not considered likely to result in significant impacts and are therefore proposed to be scoped out of the assessment:
- 13.22 Visual and setting effects on heritage assets located beyond the 1 km study area - a site visit and desk-based review of the wider landscape confirmed that, due to distance, topography and substantial intervening vegetation, no designated or non-designated heritage assets outside the 1 km radius have a plausible visual or setting relationship with the Site. As such, no significant effects are anticipated on assets located beyond this extent. However, this would be subject to review based on the final ZTV.

Assessment Methodology

Baseline Characterisation Approach

- 13.23 The cultural heritage assessment will comprise a baseline study including an archaeological desk-based assessment (DBA), geophysical survey, and a built heritage statement, followed by a programme of targeted archaeological evaluation to support the planning application. The scope and timing of all works will be agreed in consultation with the local authority's archaeological and conservation advisors. The desk-based assessment will draw on the following sources:
- West Sussex Historic Environment Record (HER);
 - WSCC Land Management Guidance and West Sussex Historic Landscape Characterisation studies and HDC Conservation Area Appraisals;
 - National Heritage List for England (NHLE);
 - Local planning policy designations, including Conservation Areas, ANAs;
 - The National Archives;
 - The British Library;
 - Site inspection and walkover survey;
 - Historic mapping including tithe/enclosure and Ordnance Survey regression;
 - LiDAR data and aerial photography;
 - Results of geophysical survey; and
 - Published and unpublished archaeological and heritage sources.
- 13.24 A site visit was undertaken in December 2025. This included a walkover of the Site, PRowS in the vicinity and an assessment of designated and potential non-designated heritage assets within the 1km study area. The wider environs of the Site area (beyond the 1km

study area) were also assessed for heritage assets that may have the potential to be impacted by the Development.

- 13.25 Geophysical (magnetometry) survey has been carried out across the accessible areas of the Site to further characterise the archaeological potential within the Site. The results of the geophysical survey will be incorporated into the forthcoming archaeological desk-based assessment. It has been agreed with the County Archaeologist that archaeological trial trenching would be secured by planning condition but would not be required for determination of the planning application.

Method

Demolition / Construction and Completed Development

- 13.26 Effects will be assessed using a staged process that will:
- Identify and assess the importance (of significance in NPPF terms) of the heritage assets;
 - Identify and assess the magnitude of impact to the heritage assets; and
 - Assess the significance of effects which considers the importance and magnitude of effect.
- 13.27 The assessment will also be informed by the landscape and visual assessment photographic viewpoints.

Cumulative Effects

- 13.28 The cumulative assessment will assess likely significant construction and completion cultural heritage effects around the Development, factoring in the influence of relevant cumulative schemes.

Assessment Criteria

- 13.29 Significance criteria will have regard to the Design Manual for Roads and Bridges (DMRB) Volume II, Section 3, Part 2, LA 104 and the following policy and guidance:
- NPPF (Chapter 16; as amended);
 - Relevant HDC Local Plan policies and guidance;
 - Ancient Monuments & Archaeological Areas Act 1979
 - Chartered Institute of Archaeologists (CifA) guidance, including Standard Guidance for Historic Environment Desk-Based Assessments (Updated 2017);
 - WSCC's Sussex Archaeological Standards 2019; and
 - Planning (Listed Building and Conservation Areas) Act 1990;
 - Historic Environment Good Practice Advice in Planning Note: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015);

- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Historic England 2017); and
- Historic England, 2019, 'Statement of Heritage Significance: Analysing Significance in Heritage Assets', Historic England Advice Note 12.

Approach to Mitigation

Demolition / Construction

- 13.30 Where practicable, archaeological remains of significance and historic landscape features would be preserved in situ and incorporated into the final design as embedded mitigation. During the construction phase, measures would be implemented to minimise potential indirect effects on the setting of nearby heritage assets. In particular, construction activities would be undertaken in accordance with agreed working hours, thereby reducing potential impacts arising from noise, vibration and artificial lighting. Details of mitigative strategies will be outlined in the CEMP and CTMP.

Completed Development

- 13.31 Cultural heritage impacts, such as effects on the setting of heritage assets, will be minimised through good design. An area of open land / pasture will be maintained in the Site's north-west corner where it abuts Adversane Conservation Area, creating a landscape buffer.
- 13.32 Similarly, the Development will retain and enhance several areas of existing trees and vegetation across the Site, which will aid in filtering new built form in views from the surrounding landscape including Adversane Conservation Area. Mitigation within the Site will be secured through detailed design, the Parameter Plans, Strategic Design Code and Outline LEMP.

14 Climate Change

14.1 Climate change in the context of EIA can be considered broadly in two parts:

- The impact of greenhouse gas emissions (GHGs) caused directly or indirectly by the Development, which contribute to climate change; and
- The potential impact of changes in climate on the Development, which could affect it directly (climate risks) or could modify its other environmental impacts (inter-related effects).

Key Baseline Considerations

Greenhouse Gas (GHG) Emissions Assessment

14.2 The Site comprises agricultural land situated to the east of the A29 Stane Street, south of Adversane. The landscape predominantly comprises open agricultural fields interspersed with belts of trees, established hedgerows, and small pockets of woodland. Buildings associated with the Brinsbury College Equine Centre are located in the south-western part of the Site.

14.3 In its current condition, the Site generates only limited baseline emissions, primarily those associated with agricultural practices, low levels of vehicle activity and energy demand linked to the Equine Centre. Carbon sequestration is provided by existing vegetation on Site.

14.4 For the purposes of the EIA, the GHG baseline emissions are considered to be zero, to enable a conservative approach to the assessment.

Climate Change Risk (CCR) Assessment

14.5 Historic climate averages during the 1991 – 2020 for the closest available climate station to the Site, which is North Heath climate station, approximately 1km south of the Site, obtained from the Met Office website⁵⁸ state the following:

- Average annual maximum temperature was 15.50°C;
- Warmest month on average was July (mean maximum temperature of 23.31°C);
- Coldest month on average was January (mean maximum temperature of 8.55°C);
- Average total annual rainfall was 858.70mm;
- Wettest month on average was October (average monthly rainfall of 103.33mm); and
- Driest month on average was May (average monthly rainfall of 46.86mm).

⁵⁸ Met Office (2026) Location Specific long-term averages [Online] Available here: <https://www.metoffice.gov.uk/research/climate/maps-and-data/location-specific-long-term-averages/gcpdj5hby> Accessed 24/03/2026

- 14.6 The EA Flood Map for Planning indicates the Site to be located in Flood Zone 1 (defined as land having a 'low probability' of flooding from rivers, i.e. a less than 0.1% annual probability). The EA Historic Flood Map also indicates that there are no records of flooding at the Site. There is an area of Low (1.0% to 0.1% AEP) to High (greater than 3.3% AEP) risk of surface water flooding in the south-east and south-west of the Site. Further information in relation to flood risk is set out in Chapter 10 of this Scoping Report.

Study Area

GHG Emissions Assessment

- 14.7 The GHG emissions assessment study area includes the Site and extends to include activities that occur beyond the Site boundary, such as the production of materials required for agricultural purposes on Site. As GHG impacts are global and cumulative with all other sources of emissions, no specific geographical study area has been defined
- 14.8 Given that climate change is a global issue, an assessment of the proposed Development's GHG emissions will be made at the 'national' scale in line with ISEP Guidance⁵⁹ on assessing GHG emissions (through assessing the significance of effects in the context of the appropriate UK Carbon Budgets⁶⁰) and the indicative sector budgets within the Carbon Budget Delivery Plan⁶¹.

CCR Assessment

- 14.9 UKCP18 data provided by the UK Met Office⁶² will be utilised for the 25 km grid cell within which the Site is located, although the area of influence for potential climate vulnerability impacts is expected to be limited to the Site and the immediate area around this.

Sensitive Receptors

GHG Emissions Assessment

- 14.10 GHG emissions have a global effect rather than directly affecting specific local receptors to which levels of sensitivity can be assigned. The global climate will therefore be treated as a single receptor. Given the global scale and severe consequences of climate change and limited recoverability, the receptor sensitivity is considered to be high.

CCR Assessment

- 14.11 The CCR assessment will consider effects on the Development over its lifetime which includes the following receptors:
- Future users and occupants;

⁵⁹ ISEP (2026). Assessing Greenhouse Gas Emissions and Evaluating their Significance 2.1: Supplemental Guidance.

⁶⁰ CCC (2025). The Seventh Carbon Budget. Advice for the UK Government. [Online] Available here: <https://www.theccc.org.uk/publication/the-seventh-carbon-budget/#post-49721-Toc187753764> Accessed: 24/03/2026

⁶¹ DESNZ (2023) Carbon Budget Delivery Plan. [Online] Available here: <https://assets.publishing.service.gov.uk/media/6424b2d760a35e000c0cb135/carbon-budget-delivery-plan.pdf> Accessed: 24/03/2026

⁶² Met Office (2018). UKCP18 [Online]. Available here <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index> Accessed: 24/03/2026

- Built infrastructure and utilities;
- Ecology, landscape and planting (including soil where relevant);
- Water environment (e.g. potable water, drought)

Scope of Assessment

Potential Significant Effects - GHG Emissions Assessment

- 14.12 The assessment will adopt whole-life carbon emission boundaries (i.e. defining the scope of emissions) that align with the Greenhouse Gas Protocol^{Error! Bookmark not defined.} and Publicly Available Standard (PAS) 2080: Carbon Management in Infrastructure^{Error! Bookmark not defined.} across the full lifecycle of the proposed Development (Modules A – D, i.e. construction, operation, maintenance, and end-of-life).
- 14.13 The GHG Protocol^{Error! Bookmark not defined.} categorises direct and indirect emissions into three broad scopes:
- Scope 1: all direct GHG emissions;
 - Scope 2: indirect GHG emissions from the generation of purchased electricity, heat or steam; and
 - Scope 3: other indirect emissions, such as the extraction and production of purchased materials and fuels, electricity-related activities not covered in Scope 2, outsourced activities, waste disposal etc.

Demolition and Construction

- 14.14 During demolition and construction GHG emissions would be generated from the following activities which have the potential to cause significant effects:
- Scope 1: direct emissions from enabling activities, land clearance and construction processes such as emissions resulting from the combustion of fuels in vehicles, plants or equipment used for construction of the proposed Development;
 - Scope 2: emissions associated with electricity needed for welfare and other facilities; and
 - Scope 3: embodied carbon from purchased materials required to construct the Development, waste processing and disposal, and any associated water use.

Completed Development

- 14.15 During operation of the completed Development, GHG emissions would be generated from the following activities which have the potential to cause significant effects:
- Scope 1: released directly by the entity being assessed, e.g. from combustion of fuel.
 - Scope 2: caused indirectly by consumption of imported energy, e.g. from generating electricity supplied through the national grid, for example for heating and lighting.
 - Scope 3: caused indirectly in the wider supply chain, e.g. the embodied carbon in materials, transportation, or the disposal of waste products.

Potential Significant Effects - CCR Assessment

Demolition and Construction

- 14.16 The Development may be vulnerable to climate risks such as heatwaves, droughts and flooding events. Receptors such as site works, temporary construction compounds and site access are considered to be the main receptors to these risks, some of which will be more susceptible to climate change than others depending on a range of factors.

Completed Development

- 14.17 During operation, the completed Development may be vulnerable to climate risks such as flooding, drought and increasing temperatures. Future users of the Development, such as residents or workers are considered to be the main receptor to these risks, some of which will be more susceptible to climate change than others depending on a range of factors such as age and existing poor health. Proposed infrastructure, such as roads, buildings and proposed planting are also considered to be key receptors to climate risks and will be explored in the ES.

Cumulative Effects

GHG Emissions Assessment

- 14.18 ISEP GHG Guidance identifies that all global cumulative GHG sources are relevant to the effect on climate change. For this reason, the ISEP GHG Guidance recommends that effects of GHG emissions from specific cumulative projects should not be individually assessed, as there is no basis for selecting particular cumulative projects that have GHG emissions over others. By its nature, the contextualisation of GHG emissions to the national carbon targets incorporates cumulative contributions of other GHG sources which make up that context. Therefore, a separate cumulative assessment will not be undertaken for the GHG assessment.

CCR Assessment

- 14.19 There are no cumulative climate vulnerability and resilience effects between the Development and other approved developments in the surrounding area, as the identified potential effects and mitigation measures are specific to the Development. Inter-related effects with other impact pathways due to climate change in the future baseline will be assessed where applicable in each other environmental topic chapters.

Non-Significant Effects

- 14.20 Decommissioning – The Development has not been designed with a specific end-of-life, or decommissioning timeframe. Technology and methodologies for decommissioning are therefore not yet known. As a result, the emissions and environmental impacts associated with end-of-life stages are considered to be highly uncertain at this stage. Decommissioning would reasonably be expected to occur after the 2050 net zero legally binding target for the UK. It is therefore reasonable to assume that the Development be compliant with future regulations and good practice standards for decommissioning activities that consider a net zero economy. This could be in the form of the use of alternatives to fossil fuels, utilising forms of low-carbon technology and transportation.

- 14.21 Maintenance and Refurbishment - Given the expected UK trajectory of decarbonisation to 2050, future maintenance and refurbishment is likely to have substantially lower carbon intensity than the initial construction stage and so is not proposed to be assessed separately.
- 14.22 Soil carbon sequestration - The baseline agricultural land use is not a significant carbon stock, as discussed above. Where possible, existing hedgerows and trees would to be retained and incorporated in landscaping for the Development, and further landscape planting is proposed. On this basis, no significant loss of carbon stocks (in soils or vegetation) are expected and assessment of land use change is proposed to be scoped out.

Assessment Methodology

Baseline Characterisation Approach

- 14.23 A desk-based study will be undertaken to establish the baseline for the Site, which will include a review of the following data sources:
- Met Office historic climate data;
 - Google Maps;
 - UK local authority GHG inventory;
 - UK Carbon Budget Orders;
 - Indicative sectoral carbon budgets from the Carbon Budget Delivery Plan; and
 - Environment Agency (EA) Flood Map for Planning (2024).

Method

- 14.24 Several standards and guidance documents have been used to inform the GHG emissions and CCR assessment methodology and potential mitigation measures.
- Environmental Impact Assessment (EIA) Guidance on assessing greenhouse gas emission and significance⁶³;
 - EIA Guidance on Climate Change Resilience and Adaption⁶⁴;
 - Publicly Available Standard (PAS) 2080:2023 Carbon management in Infrastructure (British Standards Institute⁶⁵;
 - World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI) Greenhouse Gas Protocol guidance⁶⁶, the 'GHG Protocol'; and

⁶³ ISEP (2026). Assessing Greenhouse Gas Emissions and Evaluating their Significance 2.1: Supplemental Guidance.

⁶⁴ ISEP (2020). Climate Change Resilience and Adaptation [Online]. Available here: <https://www.iema.net/media/mabhqino/iema-eia-climate-change-resilience-june-2020.pdf> Accessed: 12/01/2026

⁶⁵ British Standards Institute (BSI) (2023). 'PAS 2080:2023 Carbon management in Infrastructure'. BSI Standards Limited.

⁶⁶ WBCSD and WRI (2019). 'The GHG Protocol: Reporting Matters.' WBCSD, Geneva and WRI, Washington DC.

- UK Climate Change Projections 2018 (UKCP18) Guidance: How to use the UKCP18 Land Projections⁶⁷.

GHG Emission Assessment

- 14.25 The assessment approach draws upon ISEP guidance^{Error! Bookmark not defined.} and professional judgement as a competent professional. ISEP guidance identifies that all GHG emissions contribute to a negative environmental impact and contribute to climate change, thus might be considered significant. It therefore suggests the impact of a development on climate should be based on its potential to emit GHGs.
- 14.26 The metric for assessing the carbon emissions is units of CO₂ equivalent (CO₂e). This allows the use of the Global Warming Potential (GWP) for the emissions of seven key GHGs, including carbon and methane, to be expressed in terms of their equivalent GWP as a mass of CO₂e.
- 14.27 The GHG emissions will be calculated by multiplying activity data by the relevant carbon factor. The equation is as follows:

$$\text{Activity data} \times \text{carbon emissions factor} = \text{carbon emissions}$$

- 14.28 Carbon Factors will be sourced from recognised industry databases, such as the Government's greenhouse gas reporting The Department of Energy Security and Net Zero (DESNZ) Activity data⁶⁸⁶⁹ will be based on project information available at the time of assessment. Where information is not available, a qualitative assessment will be undertaken instead.

Defining Significance

- 14.29 There is currently no industry – wide agreed threshold of carbon emissions which, if exceeded, can be defined as significant or potentially significant. The ISEP GHG Guidance^{Error! Bookmark not defined.} acknowledges that emissions of any scale contribute cumulatively to global climate change, the consequences of which has potential to lead to significant effects.
- 14.30 The ISEP GHG Guidance^{Error! Bookmark not defined.} states that the significance of the impact of GHG emissions should be determined by considering whether a project contributes to reducing GHG emissions relative to a comparable baseline, consistent with a trajectory towards net zero by 2050. The trajectory towards net zero is mandated within the relevant carbon budget through which the specific activity falls.
- 14.31 There is an absence of significance criteria or defined threshold for determining the significance of effects resulting from GHG emissions in EIA. Significance of effect is

⁶⁷ Met Office (2018) UK Climate Projections, UKCP18. [Online] Available here: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index> Accessed: 12/01/2026

⁶⁸ DESNZ (2026) UK Territorial Greenhouse Gas Emissions Statistics [Online] Available here: <https://www.gov.uk/government/collections/uk-territorial-greenhouse-gas-emissions-statistics> Accessed: 24/03/2026

⁶⁹ DESNZ (2025) Local Authority Territorial GHG Emissions Estimates. [Online] Available here: <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F686539026569be0acf74db5a%2F2005-23-uk-local-authority-ghg-emissions.xlsx&wdOrigin=BROWSELINK> Accessed: 24/03/2026

therefore determined using professional judgement as a ‘competent professional’, and consideration of the following elements:

- Appraisal of the Development’s emissions in the context of national, local and sector emissions through establishing the current and future baseline. The net lifecycle GHG emissions of the Development will be contextualised against the UK Carbon Budgets (UK Government, 2011, 2016, and 2021), the indicative 7th carbon budget⁷⁰, and the indicative Industry sector Carbon Budgets⁷¹.
- ISEP EIA Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance; and
- How the Development has embedded design features to reduce GHG emissions and committed to identified opportunities for mitigation in the Development’s design and delivery.

14.32 The UK has set a legally binding GHG reduction target for 2050 which, according to the Climate Change Committee (CCC), is compatible with the magnitude and rate of GHG emission reductions required in the UK to meet the goals of the Paris Agreement. Given this, ISEP guidance^{Error! Bookmark not defined.} states that:

‘the crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero.’

14.33 The assessment will apply the following significance criteria in Table 14.1 that is set out in the ISEP GHG guidance^{Error! Bookmark not defined.}.

Table 14.1: GHG Significance Criteria

Significance	Criteria
Beneficial	The project’s net GHG impacts are below zero and it causes a reduction in atmospheric GHG concentration, whether directly or indirectly, compared to the without-project baseline. A project with beneficial effects substantially exceeds net zero requirements with a positive climate impact.
Negligible	The project’s GHG impacts would be reduced through measures that go well beyond existing and emerging policy and design standards for projects of this type, such that radical decarbonisation or net zero is achieved well before 2050. A project with negligible effects provides GHG performance that is well ‘ahead of the curve’ for the trajectory towards net zero and has minimal residual emissions.
Minor Adverse	The project’s GHG impacts would be fully consistent with applicable existing and emerging policy requirements and good practice design standards for projects of this type. A project with minor adverse effects

⁷⁰ CCC (2025). The Seventh Carbon Budget. Advice for the UK Government. [Online] Available here: https://www.theccc.org.uk/publication/the-seventh-carbon-budget/#post-49721-_Toc187753764 Accessed: 13/01/2026

⁷¹ DESNZ (2023) Carbon Budget Delivery Plan. [Online] Available here: <https://assets.publishing.service.gov.uk/media/6424b2d760a35e000c0cb135/carbon-budget-delivery-plan.pdf> Accessed: 12/01/2026

Significance	Criteria
	is fully in line with measures necessary to achieve the UK's trajectory towards net zero.
Moderate Adverse	The project's GHG impacts are partially mitigated and may partially meet the applicable existing and emerging policy requirements but would not fully contribute to decarbonisation in line with local and national policy goals for projects of this type. A project with moderate adverse effects falls short of fully contributing to the UK's trajectory towards net zero.
Major Adverse	The project's GHG impacts are not mitigated or are only compliant with do-minimum standards set through regulation, and do not provide further reductions required by existing local and national policy for projects of this type. A project with major adverse effects is locking in emissions and does not make a meaningful contribution to the UK's trajectory towards net zero.

- 14.34 Effects that are described as 'Minor Adverse' or 'Negligible' are determined to be 'Not Significant' and effects that are described as 'Moderate Adverse' or 'Major Adverse' are determined to be 'Significant'. All beneficial effects are determined to be 'Significant'.

Temporal Scope

- 14.35 GHG emissions will be quantified for the construction and operational phase of the Development. At this stage construction is anticipated to begin in 2028 and completed in 2045. The Development is anticipated to have a long design life, which, for the purpose of this assessment, is assumed to be 60-years. However, it is anticipated that the operation will extend beyond this timeframe. The final assessment years will be set out in the ES.

Limitations and Assumptions

- 14.36 There are inherent assumptions and limitations within GHG assessments. Industry guidance and carbon factor data highlighted within the above sections will be utilised to enable the best estimate of GHG emissions for the Development. The assessment will depend on the quality of the Development activity data available at the time of the assessment, which will require assumptions to be made due to the part hybrid nature of the Development. Any assumptions will be made to generally reflect a cautious 'worst-case' scenario.

CCR Assessment

- 14.37 An assessment that is proportionate to the hybrid nature of the planning application will be undertaken (inclusive of detailed and outline elements). At the detailed design stage, the Applicant will comply with appropriate legislation and policy requirements including the Building Regulations that are in force at the time to avoid or minimise potential effects from the Development on climate and future proof the Development to be resilient to a changing climate.
- 14.38 In lieu of a prescribed methodology, the CCR assessment will follow the categorisation of climate risks identified by the Committee of Climate Change in its 'Independent Assessment of UK Climate Risk'^{Error! Bookmark not defined.} This will draw upon and inform other reports, such

as the FRA, Energy and Sustainability Strategy, and Outline LEMP as they set out the design principles that address and respond to the anticipated uncertainties within the predicted future climate models. In addition, a summary of the sustainability and energy provisions included within the Development will be provided.

- 14.39 The CCR assessment will use the UK Climate Change Projections 2018 (UKCP18) provided by the UK Met Office^{Error! Bookmark not defined.}. UKCP18 uses Representative Concentration Pathways (RCPs) to develop projections and consider factors such as economic activity, population growth and land use change, which will result in a different range of global mean temperature increases. RCP 8.5 represents the highest emissions scenario, and this is considered the most appropriate scenario for assessing the impact of climate change on the Development, to provide a suitable conservative approach.
- 14.40 ISEP CCR guidance^{Error! Bookmark not defined.} recommends that the climatic baseline should consider extremes in short-term weather events, such as heatwaves; long-term climatic variability, such as seasonal changes in precipitation; and average climate norms, such as ambient temperature.
- 14.41 A review of the following data will be undertaken:
- Average Summer Precipitation (% change);
 - Average Winter Precipitation (% change);
 - Average Annual Precipitation (% change);
 - Maximum Average Summer Temperature;
 - Maximum Average Winter Temperature; and
 - Annual Mean Temperature.

Defining Significance

- 14.42 There is no nationally adopted method for assessing and determining significance of climate change impacts within EIA. The assessment approach will therefore draw upon guidance from ISEP and professional judgement as a competent professional). This includes the consideration of whether the effect is temporary or permanent.
- 14.43 The significance of the CCR assessment findings is determined as a function of the likelihood of a climate change impact occurring (in combination with the sensitivity of the receptor) and the consequence to the receptor if the impact occurs. Effects that are described as 'Minor Adverse' or 'Negligible' are determined to be 'Not Significant', and effects that are described as 'Moderate Adverse' or 'Major Adverse' are determined to be 'Significant'.

Temporal Scope

- 14.44 UKCP18 provides climate change projections up to 2100 in the UK. Therefore, this assessment will assume projections for 2100 as the most far-reaching projection and is considered to be appropriate for the design life of the Development.

Limitations and Assumptions

- 14.45 The climate change risk and resilience assessment utilises the latest information sources available at the time of submission. New climate information is published regularly as more in-depth analysis of climate change is completed, which may supersede the information used to inform the submitted assessment.
- 14.46 The assessment itself is largely qualitative, with the exception of assessment relevant to drainage assets and flood risk, which can be informed by the Environment Agency climate change allowances for increases in peak river flow and rainfall intensity.
- 14.47 There is often uncertainty in the relationship between changes in climate hazards and the respective response in terms of the Development performance. This uncertainty will be assessed qualitatively.

Approach to Mitigation

Demolition and Construction

- 14.48 Construction phase GHG emissions would be minimised through the Outline CEMP which would include targeted carbon-reduction measures such as use of low-emission or electric plant where feasible; anti-idling controls; efficient site layout to reduce plant movements; sourcing materials locally where practicable; and minimising waste generation and maximising reuse of demolition arisings.
- 14.49 An Outline CTMP will set out measures to reduce transport-related emissions, including consolidation of deliveries, routing strategies to minimise travel distances, and support for low-carbon transport modes for construction workers.

Completed Development

- 14.50 The Development will incorporate energy-efficient design in accordance with Building Regulations and relevant best-practice standards. Measures to reduce operational energy demand may include high-performance building fabric, low-carbon heating systems, efficient lighting, and smart energy controls. Climate resilience features such as Sustainable Drainage Systems (SuDS), biodiversity-led landscaping, and the measures set out in the Outline Landscape and Ecology Strategy will also support long-term carbon and climate performance.
- 14.51 The Development will promote low-carbon travel by providing a connected network of footpaths and cycle routes, secure cycle parking, and integration with local public transport. These measures are intended to reduce reliance on private vehicles and support mode shift to active and sustainable travel.

15 Non-Significant Topics

Introduction

- 15.1 In accordance with the EIA Regulations, an Environmental Statement (ES) is required to report only the *likely significant environmental effects* of a development. The approach to this scoping exercise has been informed by current Planning Practice Guidance (PPG), which emphasises that an ES should focus on the *main* or *significant* effects, avoiding unnecessary detail on matters unlikely to result in significant environmental change.
- 15.2 Based on the findings of the scoping study, the topics listed below are not anticipated to give rise to significant environmental effects as a result of the Development. These topics are therefore proposed to be **scoped out** of the EIA and will not be assessed in detail or as stand-alone chapters within the ES:
- Materials and Waste;
 - Ground Conditions and Contamination;
 - Light Pollution;
 - Microclimate, including Wind, Daylight, Sunlight, Overshadowing and Solar Glare;
 - Major Accidents and Disasters;
 - Utilities;
 - Aviation; and
 - Human Health.
- 15.3 The rationale for scoping these topics out is provided in the sections below. Where reliance is placed on standard embedded or committed mitigation measures, these are identified.

Materials and Waste

- 15.4 The Site is predominantly agricultural, with a small number of residential and commercial buildings, and is therefore expected to generate low levels of waste. There are no known historic landfills on the Site and no safeguarded waste management sites identified within the Werst Sussex Minerals and Waste Local Plan within 5km of the Site.

Demolition and Construction

- 15.5 In line with IEMA guidance, the upstream environmental effects associated with the extraction, processing and manufacture of construction materials cannot be meaningfully assessed within the EIA, as these impacts occur outside the Site boundary and are already regulated through national and international supply-chain standards. These effects cannot be reliably quantified at this stage due to the dispersed nature of material sourcing, although effects are unlikely to be significant.
- 15.6 Efficient material use during construction would be addressed as part of the Sustainability and Energy Strategy. Related effects—such as embodied carbon, transport of materials

and energy use—will be assessed within the relevant ES chapters, including the Transport and Access, and Climate Change. No constraints on material availability are anticipated, and the scale of material demand is not expected to affect regional supply chains.

- 15.7 On this basis, significant effects from the consumption of material resources during construction is considered unlikely.
- 15.8 The Development will apply the waste hierarchy (prevent → reuse → recycle → recover → dispose). Construction waste will be managed in accordance with the Environmental Protection Act Duty of Care, relevant legislation and recognised industry best practice. An **Outline Site Waste Management Plan (SWMP)**, which would cover demolition, excavation and construction (CD&E) phases, will be secured through the Outline CEMP.
- 15.9 Demolition waste—anticipated to comprise soils, inert materials, concrete, brick and metals—will be minimised through design and reuse where feasible. Given the limited extent of existing buildings, demolition waste volumes are expected to be low
- 15.10 Construction waste will also arise from excavation and building activities. Given the greenfield nature of the Site, significant volumes of hazardous or contaminated soil arisings are not expected. Construction waste streams are anticipated to have high potential for diversion from landfill, and overall volumes are unlikely to materially affect regional waste management capacity. Waste minimisation principles will be embedded within the design process, and estimated waste quantities will be reported in the ES in accordance with the EIA Regulations.
- 15.11 The SWMP will set out responsibilities, procedures, targets and record-keeping arrangements, supported by additional controls secured through the CEMP. A **Materials Management Plan (MMP)** will also be secured by planning condition for both the outline and detailed components to support the safe testing, tracking and reuse of excavated materials in accordance with the CL:AIRE Definition of Waste Code of Practice. With these measures in place, significant effects from demolition and construction waste are not anticipated.

Completed Development

- 15.12 Material use associated with routine maintenance during the operational phase cannot be meaningfully quantified at this stage and is expected to be low in volume. Such use is not anticipated to give rise to significant environmental effects. Operational waste will comprise typical municipal and commercial waste streams, which will be managed through the local authority's collection service or via commercial waste contractors, depending on the end-use.
- 15.13 The Site is within the Brick Clay Resource Minerals Consultation Area (MCA) and 'Gas Authority Licenced Block' within the West Sussex Joint Minerals and Waste Local Plan. Small areas within the Site are also subject to 'Waste Infrastructure Consultation Area' and a 'Minerals Infrastructure Consultation Area'. A separate Mineral Resource Assessment will be prepared to accompany the planning application in line with Minerals and Waste Safeguarding Guidance.

- 15.14 The UK Oil & Gas PLC exploration well at Broadford Bridge, located approximately 400 m east of the Site, has been inactive for several years and remains in care-and-maintenance status. No production activities are taking place.
- 15.15 An Outline Operational Waste Management Plan (OWMP) will accompany the planning application. The OWMP will set out the overarching principles to ensure that the site layout and building design incorporate adequate provision for waste storage, segregation and collection. It will also define the minimum design and management standards that future occupiers must meet to ensure waste is handled safely, efficiently and in accordance with the waste hierarchy. The OWMP will include estimated operational waste arisings based on the proposed land uses.
- 15.16 No safeguarded waste sites or safeguarded waste transport routes are expected to be adversely affected by either the construction or operation of the Development. West Sussex County Council (WSCC), as the Waste Planning Authority, is responsible for ensuring sufficient waste management capacity across the county and for identifying where new facilities may be required. The adopted Waste Local Plan allocates six strategic waste sites (Policy W10), and WSCC's 2024 review confirms that the Plan remains effective and does not require updating. The Applicant will continue to engage with WSCC during the pre-application process to understand any implications for county-wide waste infrastructure capacity and to agree appropriate mitigation where necessary.
- 15.17 With appropriate on-site waste infrastructure, design measures aligned with the waste hierarchy, and compliance with the OWMP, the Development is not expected to result in significant adverse effects on local or strategic waste management infrastructure.

Ground Conditions and Contamination

- 15.18 A Phase 1 Geo-Environmental Assessment (December 2025) and Factual Geotechnical Ground Investigation has been carried out on the Site (2020).
- 15.19 Historical mapping indicates that the majority of the Site remained undeveloped till present day with railway line crossing Site from north to south at the central area. Several farms were present across the Site. A small limekiln was located at southeast part of the Site up till 1896 together with a wind pump and reservoir from the early 1900s. Farm development extended within the southern part of the Site boundary during 1970s.
- 15.20 A review of geological mapping indicates that the Site is partially underlain by Alluvium, Head deposits along watercourses in the south, Arun Terrace Deposits are present within limited area at the northwest. The whole Site is then underlain by bedrock of Weald Clay Formation (Mudstone and Sandstone). The Environment Agency classifies the superficial deposits of Alluvium and Arun Terrace Deposits as Secondary A Aquifer and Head deposits as Secondary Undifferentiated Aquifer. Bedrock of Weald Clay Formation (Sandstone) as Secondary A Aquifer and Weald Clay Formation (Mudstone) as unproductive stratum. Previous ground investigation works at the limited area of the Site (north) indicated standing water levels ranging between 0.33m bgl and 1.55m bgl.
- 15.21 The Site lies outside of any Groundwater Source Protection Zones (SPZ) therefore, the groundwater underlying the Site is deemed to be of low sensitivity. Due to the relatively

impermeable geology (Weald Clay) underlying the Site, infiltration into the ground is currently proposed. As such, there is very limited scope for the Development to have any detrimental impact upon groundwater quality or groundwater recharge over the lifetime of the Development.

- 15.22 No historic landfills are present within the Site. The closest are c. 85m north of the Site.
- 15.23 During the site walkover, no significant contamination sources were recorded to be present on-Site. Potential sources of contamination are limited to: agricultural land, made ground (associated with farms, dirt tracks, commercial units, reservoir and wind pump), limekiln, stockpiled soils, railway tracks, electricity substation and alluvium deposits (ground gas). Localised contamination may be present therefore limited ground investigation works would be undertaken prior to construction (to be secured by planning condition).
- 15.24 As reported in the Phase 1 Geo-Environmental Assessment, when considered in the context of the conceptual site model, the Development is considered to pose a moderate/low risk to human health, which is principally through ground gas and vapour risk and potential soil contamination within limited areas of the Site. The risk posed to controlled waters is predominantly considered to be low.
- 15.25 Standard pollution-prevention and environmental protection measures will be secured through the Outline CEMP, alongside planning conditions, to ensure that the Development does not give rise to unacceptable risks from land contamination, ground gases, or pollution of air or water during construction or operation. These measures will be consistent with relevant legislation, guidance and best practice. Should further intrusive investigations identify any localised ground stability or contamination issues, an appropriate mitigation strategy will be prepared at the detailed design stage to ensure the Development is not placed at unacceptable risk and does not adversely affect the surrounding environment.

Light Pollution

- 15.26 Light Pollution refers to the adverse effects of artificial lighting on the environment, human receptors and the night sky. It includes any form of unwanted, inappropriate or excessive artificial light that results in:
- Sky glow – brightening of the night sky over inhabited areas;
 - Light spill / trespass – light falling where it is not intended or needed (e.g., into homes or ecological habitats);
 - Glare – excessive brightness causing visual discomfort or reduced visibility; and
 - Clutter – bright, confusing or excessive groupings of light sources.
- 15.27 The Site is currently largely undeveloped and therefore experiences a low baseline lighting environment. Existing light sources are limited to vehicle headlights and street lighting associated with Adversane Road (B2133) to the north and the A29 Stane Street to the west. Potentially sensitive receptors include nearby residential properties, users of PRoW, highway users, and ecological receptors associated with woodland, hedgerows and waterbodies.

- 15.28 Temporary lighting will be required during demolition and construction, particularly during winter months. Such lighting will be controlled through standard measures secured within the Outline CEMP, including directional lighting, time controls and avoidance of unnecessary spill. Construction-phase lighting effects on ecological receptors will be assessed within the Ecology ES chapter, with mitigation designed in accordance with the Bat Conservation Trust (BCT) and Institution of Lighting Professionals (ILP) Guidance Note 08/23 Bats and Artificial Lighting at Night (or subsequent updates).
- 15.29 The completed Development will incorporate a modern, efficient and well-controlled external lighting scheme designed in accordance with relevant British Standards, ILP guidance and CIBSE best practice. An Outline Lighting Strategy will accompany the hybrid planning application to demonstrate how lighting will be designed to minimise obtrusive light, glare and sky glow. This will be appended to the ES as it will inform other assessments, notably Biodiversity and Landscape and Visual Impact.
- 15.30 Lighting design principles will be embedded within the Outline Lighting Strategy, informed by input from the project ecologist, landscape architect, heritage and transport consultants. This will ensure that lighting is appropriately located, directed and controlled to avoid significant adverse effects on landscape character, visual receptors, heritage assets, ecological features and the night sky. Any residual lighting effects will be assessed within the relevant ES chapters, including Landscape and Visual Impact, Cultural Heritage and Biodiversity.
- 15.31 Floodlighting associated with external sports pitches would be located away from sensitive receptors where practicable and designed to minimise light spill and glare. Such lighting would be subject to detailed design controls to ensure compliance with ILP guidance and to avoid unacceptable effects.
- 15.32 Given the low baseline lighting environment, the adoption of best-practice lighting design, and the controls secured through the Outline CEMP and planning conditions, significant light pollution effects are not anticipated. As noted above, any topic-specific lighting effects will be assessed within the relevant ES chapters rather than through a standalone Light Pollution chapter.

Microclimate - Wind, Daylight, Sunlight, Overshadowing and Solar Glare

- 15.33 Based on the emerging masterplan, the Development is not of a height or density that would typically give rise to significant wind microclimate, daylight, sunlight or overshadowing effects. Built form will be set back from existing residential properties, ensuring that any changes to daylight, sunlight or overshadowing at off-site receptors would be negligible. The scale and massing of the Development also mean that wind-related comfort or safety effects at existing receptors are not anticipated. Appropriate buffers and open-space corridors will be incorporated to avoid overshadowing of sensitive ecological habitats.
- 15.34 There are no prescribed significance criteria for assessing solar glare; therefore, professional judgement has been applied to determine whether the Development could give rise to meaningful effects. Potentially sensitive receptors include road users on Adversane Road (B2133) to the north and the A29 Stane Street (A29) to the west, as well as on-site vehicle operators. The nature of the Development is such that significant solar glare effects

are unlikely. Where reflective surfaces are used, e.g. photovoltaic panels, they are unlikely to cause visual distraction or temporary disability glare for receptors.

Major Accidents and Disasters

- 15.35 Paragraph 8 of Schedule 4 to the EIA Regulations requires the ES to include a description of the likely significant effects of the Development arising from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the Development. Where relevant, this should include measures to prevent or mitigate significant adverse environmental effects and information on preparedness for, and response to, such events.
- 15.36 The IEMA Quality Mark Primer on 'Assessing Risks of Major Accidents / Disasters in EIA'⁷² defines major accidents and disasters as follows:
- Major accident: *'Events that threaten immediate or delayed serious environmental effects to human health, welfare and/or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events.'*
 - Disaster: *'May be a natural hazard (e.g. earthquake) or a man-made/external hazard (e.g. act of terrorism) with the potential to cause an event or situation that meets the definition of a major accident.'*
- 15.37 The IEMA Primer states that *'major accidents and/or disasters can be scoped out of the assessment if you can clearly demonstrate that: 1. there is no source-pathway-receptor linkage of a hazard that could trigger a major accident and/ or disaster or potential for the scheme to lead to a significant environmental effect; or 2. all possible major accidents and/or disasters are adequately covered elsewhere in the assessment or covered by existing design measures or compliance with legislation and best practice.'*
- 15.38 A screening exercise of potential major accidents and disasters has therefore been undertaken considering the nature of the Site and the Development and this is presented in Table 15.1. General risks arising from typical external environmental and anthropogenic hazard sources have been considered from the UK National Risk Register⁷³. The key hazards and risks in the Register have been reviewed and for those considered relevant to the Development, the potential effects on receptors within and outside of the Site have been considered in determining whether the aspect should be scoped into the EIA.

⁷² IEMA, 2020. Major Accidents and Disasters in EIA: An IEMA Primer. September 2020.

⁷³ HM Government, Cabinet Office. National Risk Register 2025. Published 16 January 2025. Available at: https://assets.publishing.service.gov.uk/media/67b5f85732b2aab18314bbe4/National_Risk_Register_2025.pdf

Table 15.1: Major Accidents and Disasters: Screening Review

Hazard	Environmental Receptor	Resultant Impact	Scope in / Scope Out
Natural Hazards (Disasters)			
Flooding (surface water, fluvial, groundwater)	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / infrastructure.	Scope Out – The Development is located primarily within Flood Zone 1 however there are areas of surface water flooding within the Site. ES chapter on Water Resources and Flood Risk will consider flood risk to and from the Development, including surface water flood risk, drainage design and resilience measures. A separate major accidents and disasters assessment is therefore not required in respect of flooding.
Extreme Weather (storms, heatwaves, drought, high winds)	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / infrastructure.	Scope Out – Climate-related risks such as overheating, storm damage, and resilience to severe weather are relevant to the design and operation of the Development, but these matters are addressed through the Climate Change chapter and through the design process. They are not expected to give rise to separate likely significant environmental effects requiring a standalone ES chapter on major accidents and disasters.
Wildfires	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / infrastructure	As above.
Technological / Industrial Accidents (Major Accidents)			
Road Traffic Accidents	Human receptors and local road users	Potential injury or loss of life to people, and damage to property / infrastructure. Potential pollution events.	Scope Out – Traffic incidents on the surrounding highway network may give rise to temporary local disruption, but these would be managed through established

Hazard	Environmental Receptor	Resultant Impact	Scope in / Scope Out
			emergency and highways response procedures and are not expected to result in likely significant environmental effects requiring separate assessment under this topic. Transport-related environmental effects associated with the Development itself are addressed in the Transport and Access, Air Quality, and Noise and Vibration chapters.
Rail incidents - derailment, fire	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / infrastructure associated with a rail incident.	Scope out - The railway is an existing operational asset regulated by Network Rail and the wider rail safety regime. The Development (including the railway bridge) will be designed in consultation with Network Rail to maintain safe operation of the line, including the proposed bridge interface. Rail incidents are low-likelihood events managed through established rail safety, maintenance and emergency response procedures, and are not expected to give rise to likely significant environmental effects requiring separate assessment in the ES.
Aircraft incidents	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / development infrastructure arising from an aircraft incident.	Scope out - Hadfold Farm Airstrip is a small private grass airstrip approximately 170 m north of the Site, understood to support limited general aviation / microlight activity. Although an aircraft incident could theoretically result in injury to people and damage to development infrastructure, such events are very low likelihood. The Development would not materially alter the

Hazard	Environmental Receptor	Resultant Impact	Scope in / Scope Out
			operation of the airstrip or introduce a credible pathway to increase aviation risk. Any aviation safety matters would be addressed through the design and planning consultation, where necessary.
Utilities failure (gas, electricity, water, sewerage)	Human and sensitive ecological receptors	Potential injury or loss of life to people, and damage to property / development infrastructure	Scope out – The Development will be designed and constructed in accordance with relevant legislation, Building Regulations and fire safety standards. Utility infrastructure will be designed, diverted or protected as necessary, and utility providers have established emergency response procedures.
COMAH Sites / Major hazardous pipelines	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / development infrastructure	Scope out - No COMAH establishments have been identified in the vicinity of the Site, and no major hazardous pipelines are known to affect the Site.
Oil and Gas Extraction hazards	Human receptors and Development infrastructure	Potential injury or loss of life to people, and damage to property / development infrastructure	Scope out - Broadford Bridge well is inactive and in care-and-maintenance. No active hydrocarbon extraction or processing is being undertaken within or close to the Site.

15.39 This review confirms that:

- No standalone major accidents and disasters assessment is required.
- Relevant risks are low likelihood, regulated separately, or assessed elsewhere in the ES.
- No COMAH sites, major hazardous pipelines or other credible external hazards have been identified nearby.

Utilities

15.40 An initial utility search and utility strategy have been undertaken for the Development. This identifies the potential presence of existing electricity, gas, water, foul sewer and telecommunications infrastructure within or adjacent to the Site, including apparatus

associated with SSEN, SGN, UK Power Networks, Southern Water and BT/Openreach. Existing utility assets are primarily located along the Site boundaries and within highway corridors, although some infrastructure may cross parts of the Site.

- 15.41 The Development will be designed to account for existing utility constraints and to incorporate appropriate easements, stand-offs, diversions and protective measures where required. These principles will be agreed with the relevant statutory undertakers and reflected in the evolving utility strategy.
- 15.42 Utility infrastructure for the Development, including electricity, potable water, foul drainage and telecommunications, will be provided through new and/or upgraded connections as necessary. Full fibre broadband will be provided to new homes. Potable water demand and foul drainage will be considered within the Water Resources and Flood Risk chapter of the ES.
- 15.43 Significant effects in relation to utilities are not anticipated. Where relevant, utility-related effects, including those associated with potable water, foul drainage and physical utility connections, will be considered within the relevant technical chapters of the ES. On this basis, a standalone ES chapter on utilities is proposed to be scoped out.

Aviation

- 15.44 Hadfold Farm Airstrip is a small private unlicensed grass airstrip located approximately 175 m north of the Site, understood to serve limited light aircraft and microlight activity. It is not a commercial airport or safeguarded aerodrome.
- 15.45 Brighton City Airport and London Gatwick Airport are located approximately 21.4 km south-west and 24.8 km north-east of the Site respectively. The Site does not fall within any airport safeguarding or public safety zone associated with either.
- 15.46 In view of the limited scale of the nearby private airstrip, the distance from commercial airports, and the absence of any identified safeguarding or other aviation constraint affecting the Site, no likely significant environmental effects arising from aircraft activity are anticipated. Aircraft-related effects are therefore proposed to be scoped out of the ES.

Electromagnetic Interference

- 15.47 New electrical plant including substations within the Site would be designed in accordance with the relevant British Standard in force at the time (e.g. BS EN 62041:2010) which sets specific limits for electro-magnetic fields.
- 15.48 No major sources of electro-magnetic fields (such as high voltage transformers or electricity transmission line/cables) are proposed as part of the Development.

Human Health

- 15.49 Since the inclusion of population and human health within the EIA Regulations in 2017 (as amended), a number of guidance documents have clarified the role of health in EIA. In

particular, current IEMA guidance (now ISEP) confirms that human health is a distinct topic from population, with the latter generally addressing demographic and socio-economic matters. Human health in EIA is concerned with the potential for likely significant effects on health outcomes or health determinants, taking account of the nature, scale and location of the proposed development and the characteristics of the affected population.

- 15.50 Collectively, current guidance supports a proportionate, risk-based approach to health in EIA, under which health effects should be scoped in only where there is a realistic potential for likely significant effects on population health. In particular:
- Public Health England (2017) notes that scoping should usually result in most potential health issues being legitimately scoped out of EIA;
 - IEMA (2017) states that the scoping of population and human health should focus on whether potential impacts are likely to be significant;
 - IAIA (2020) advises that health assessment should be proportionate and that effects not likely to significantly influence population health should be scoped out; and
 - IEMA (2022) confirms that, where there is no potential for likely significant population health effects, human health should be scoped out of the EIA.
- 15.51 The IEMA Guide to Determining Significance for Human Health in Environmental Impact Assessment (2022) sets out a framework for considering the wider determinants of health and for identifying where health effects may be both likely and significant. The guidance emphasises that the assessment should be proportionate, evidence-based and focused on material health outcomes. It also recognises that many potential health pathways can be scoped out where:
- there is no credible pathway to significant health effects;
 - the relevant effects are already assessed within other technical topics; or
 - embedded design measures and secured mitigation mean that significant health effects are not likely to arise.
- 15.52 Table 15.2 considers the relevant wider determinants of health in the context of the Development and demonstrates that, consistent with IEMA/ISEP guidance and other recognised good practice, there is no basis for identifying a separate likely significant effect on human health requiring a standalone ES chapter. Human health is therefore proposed to be scoped out as a separate topic, while relevant determinants and pathways will be addressed, where appropriate, within the relevant technical chapters of the ES. Health determinants have been considered with regard to sensitive populations and health inequalities.

Table 15.2: Health Effect Approach using Relevant Wider Determinants

Categories	Wider Determinants of Health	Commentary
Health related behaviours	Physical activity	Scoped in via Socio-economics, Transport and Access, and Landscape and Visual Impact. The Development has potential to support active travel and access to open space through walkable neighbourhood design, pedestrian and cycle infrastructure, and provision of open space. These pathways are considered through the relevant topic chapters. No separate likely significant effect on population health is identified requiring standalone health assessment.
	Risk taking behaviour	Scoped out as a separate determinant. The Development does not introduce uses or activities likely to materially influence risk-taking behaviours at population level. Construction and operational safety risks will be managed through standard health and safety legislation, design measures and the CEMP. No likely significant population health effect is identified.
	Food environment, diet and nutrition	Scoped out as a separate determinant. While the Development may include local retail and growing space, it is not expected to materially alter diet and nutrition at population level. No likely significant health effect is identified.
Social Environment	Housing	Scoped in via Socio-economics. The Development has potential to influence health through the provision of market and affordable housing, including effects associated with housing availability and quality. These effects will be assessed in the Socio-economics chapter.
	Relocation	Scoped in via Socio-economics. The displacement of existing uses and any associated effects on livelihoods, access or community stability will be considered within the Socio-economics chapter.
	Open space, leisure, play and access to nature	Scoped in via Socio-economics and addressed through Design and Green Infrastructure strategy. The Development will provide open space, play and recreation opportunities. The adequacy of provision and any mitigation requirements will be assessed through the relevant application documents and ES chapters. No separate likely significant health effect is identified.
	Transport modes, access and connections	Scoped in via Transport and Access. The Development has potential to influence health through changes in accessibility, connectivity and opportunities for active travel. These pathways will be assessed in the Transport and Access chapter and through the Travel Plan framework.
	Access to services and amenities	Scoped in via Socio-economics and addressed through Design. The Development will provide a range of local services

Categories	Wider Determinants of Health	Commentary
		which will be defined to be readily accessible by all. No separate likely significant health effect is identified.
	Community safety	Scoped out as a separate determinant. Community safety considerations will be addressed through design measures, including natural surveillance and Secure by Design principles. No separate likely significant population health effect is identified.
	Community identity, culture, resilience and influence	Scoped out as a separate determinant. While community engagement and place-making are relevant to design development, the Development is not expected to give rise to likely significant effects on community identity, culture, resilience or influence at a population level.
	Social participation, interaction and support	Scoped out as a separate determinant. The Development may support social interaction and community cohesion through mixed-use and shared spaces, but no likely significant population health effect is identified requiring separate assessment.
Economic Environment	Education and training	Scoped in via Socio-economics. The Development may influence health through effects on education capacity, skills development and training opportunities. These matters will be assessed in the Socio-economics chapter.
	Employment and income	Scoped in via Socio-economics. The Development may influence health through employment generation, income and economic participation. These effects will be assessed in the Socio-economics chapter.
Bio-physical environment	Climate change mitigation and adaptation	Addressed via Climate Change and Water Resources and Flood Risk. The Development's resilience to overheating, flooding and extreme weather, and its contribution to climate mitigation, will be considered in the relevant ES chapters. No separate likely significant health effect is identified beyond those pathways.
	Air quality	Addressed through Air Quality. Potential health effects associated with changes in air quality will be assessed in the Air Quality chapter. The need for mitigation will be identified where necessary. No separate human health assessment is considered necessary unless likely significant population health effects are identified.
	Water quality or availability	Addressed through Water Resources and Flood Risk. Potential health-related pathways associated with water quality, water availability and flood risk will be considered in the relevant ES chapter. Embedded mitigation and water efficiency measures will be incorporated as appropriate. No separate likely significant health effect is identified.
	Land quality	Addressed through land contamination / ground conditions reporting. Potential risks associated with land quality will be addressed through the relevant technical reports and remediation

Categories	Wider Determinants of Health	Commentary
		measures, if required. No separate likely significant population health effect is identified.
	Noise and vibration	Addressed through Noise and Vibration. Potential health-related effects associated with construction and operational noise and vibration will be assessed in the Noise and Vibration chapter. Mitigation will be incorporated where necessary. No separate human health assessment is proposed unless likely significant population health effects are identified.
	Radiation	Scoped out as a separate determinant. No credible source-pathway-receptor linkage relating to radiation has been identified.
Institutional and built environment	Health and social care services	Scoped in via Socio-economics. The Development may influence demand for primary healthcare and related services. This will be assessed in the Socio-economics chapter, including any mitigation where necessary.
	Built environment	Scoped out as a separate determinant. The built environment will be designed in accordance with relevant accessibility, inclusivity and design standards. No separate likely significant health effect is identified beyond those addressed through design and other ES topics.
	Wider societal infrastructure and resources	Scoped out as a separate determinant. No likely significant health effects have been identified in relation to wider societal infrastructure and resources beyond those already considered through housing, transport, community infrastructure and socio-economics.

15.53 On this basis, human health is proposed to be scoped out as a separate ES chapter. This is because no separate likely significant effects on population health have been identified that would require standalone assessment within the EIA. Relevant health pathways and wider determinants of health will instead be considered, where appropriate, through the technical assessments already scoped into the ES.

15.54 Notwithstanding this, and to support a comprehensive consideration of health in the built environment, a standalone Health Impact Assessment (HIA) will be submitted with the planning application. The HIA will be informed by relevant public health and healthy place-making guidance and will identify measures to maximise beneficial health outcomes and minimise potential adverse effects.

Appendix 1 - Initial Long List of Cumulative Schemes

No.	District	Application Reference	Development Description	Status	Distance to Site
Within 2km					
1	Horsham	DC/24/1581	Outline planning application for up to 79 Dwellings (including affordable homes) with all matters reserved except for access.	Permitted 09 Dec 2025	1.46km N
2	Horsham	DC/24/0031	Hazardous Substance Consent for the storage of upto 49 tonnes of Liquefied Petroleum Gas (LPG)	Permitted 1 April 2025	1.9km NE
Within 10km (Granted)					
3	Horsham	DC/14/0590	Residential development of up to 540 dwellings and 54 retirement living apartments, associated vehicular, cycle and pedestrian access, drainage and landscape works (Outline)	Outline Application Granted 25 June 2015. Several NMAs, RMAs, Discharge of Conditions submitted. Most Recent NMA (DC/24/0772, Granted June 2024) submitted for new development description. Part Built Out.	7.4km NE
4	Horsham	DC/24/1289	Proposed construction, operation and maintenance of a Battery Storage Energy System (BESS) with associated Infrastructure and works including highway access, landscaping and bio-diversity enhancements.	Granted 03 March 2025	6.4km E
5	Horsham	DC/22/2077	Demolition of existing building and the erection of 3no buildings to provide flexible industrial and storage and distribution floorspace (Use Class B2/B8) and ancillary office floorspace, with associated hard and soft landscaping, car and cycle parking, supporting infrastructure and retention of existing attenuation pond.	Granted 04 June 2024. NMA Granted 10 July 2025 (DC/25/0860) for removal of reference to '3no 'units in the descriptio of development'	8.9km NE
6	Horsham	DC/23/2172	Construction and operation of a solar photovoltaic farm and associated infrastructure including transformers, inverters, DNO Substation, customer switchgear, security cameras, fencing, access tracks and landscaping.	Granted 24 May 2024	10km E
7	Horsham	DC/16/1919	Provision of a community building, 2 x football pitches, a cricket pitch, 2 x tennis courts, a multi-use games area (MUGA), a skate park, a LEAP-NEAP with associated access, parking and landscaping works (application for approval of Reserved Matters following outline approval DC/14/0590)	Granted 08 March 2017. Mostly built, further pitches remaining.	7.4km NE
8	Horsham	DC/22/0302	Demolition of existing warehouse buildings and redevelopment to provide employment units for a flexible range of employment uses (Use Classes E(g)(iii), B2 and/or B8) erection of ancillary offices, together with the provision of yard areas, parking, landscaping and associated works	Granted 14 April 2023	7.9km NE
9	Horsham	DC/21/2321	Outline planning permission (with all matters reserved except for means of access from Glebelands) for the demotion of existing structures and the redevelopment of the site with a residential development scheme of up to 170 dwellings, a countryside park, associated earthworks and infrastructure	Granted 07 July 2023. RMA Validated 28 Jan 2025 (DC/24/1676, Awaiting Decision)	3.2km SW
Within 10km (Pending)					
1-	Horsham	DC/25/1697	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).	Validated 05 November 2025, Pending Decision	3.8km N
11	Horsham	DC/26/0266	Demolition of existing buildings and the redevelopment of the site to provide 150 dwellings, including affordable housing, land for the community land trust, works to public right of way and associated landscaping, open space and infrastructure.	Validated 16 February 2026, Pending Consideration	4.6km SE
12	Horsham	DC/26/0366	Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.	Validated 03 March 2026, Pending Consideration	7.4km NE
13	Chichester	22/02346/OUT	Outline application for a wellbeing and leisure development comprising up to 121 holiday units; the construction of a spa with accommodation of up to 50 bedrooms; the conversion of the former clubhouse into a restaurant and farm shop; the formation of a new vehicular access from Foxbridge Lane, new internal roads, footpaths, cycle routes and car parking areas; the construction of a concierge building and new hard and soft landscaping, including the formation of new ponds. All matters reserved except for means of access.	Validated 14 September 2022, Pending Consideration	8.3km NW

14	Chichester	25/00658/FUL	Proposed construction, operation and decommissioning of a solar farm and associated infrastructure.	Validated 27 March 2025, Pending Consideration	5km NW
15	Chichester	25/01686/OUT	Outline planning application (with all matters reserved except for access) for a mixed use site accommodating 223 new homes, Class E uses and supporting infrastructure.	Validated 22 July 2025, Pending Consideration	8.8km NW
16	Horsham	DC/23/0406	Demolition of existing buildings and erection of 152 dwellings, all-weather sport pitch, sports pavilion and allotments; with associated access, landscaping, open space and infrastructure (amended plans to the community / sports provision to provide 1 full-size all-weather pitch and a larger pavilion)	Validated 03 March 2023, Pending Consideration	6.7km SE
Nationally Significant Infrastructure Projects (NSIP)					
17	Multiple	EN010117	Offshore wind farm with up to 90 wind turbines, associated foundations and all the electrical infrastructure required to transmit the power into the national electricity network at Bolney in Mid Sussex.	Granted 4 April 2025	10km S
N.B Site Allocations will be also be reviewed and assessed where applicable. Site Allocations will be derived from either the Adopted Local Plan or Emerging Local Plan.					

Appendix 2 – Preliminary Key Views Analysis

KINGSWOOD VILLAGE ADVERSANE

PRELIMINARY KEY VIEWS ANALYSIS

Prepared on behalf of
Our Place

MAY 2026



KINGSWOOD VILLAGE, ADVERSANE

PRELIMINARY KEY VIEWS ANALYSIS

CLIENT: OUR PLACE SUSTAINABLE DEVELOPMENT LTD

REFERENCE: 3407-APA-ZZ-XX-RE-L-9001

STATUS: FOR PLANNING

REV	DESCRIPTION	DATE	BY/CHK
P00.01	First Draft	21/08/25	TB/JH
P00.02	Red line updated	25/11/25	TB
P00.03	Red line updated	27/11/25	TB
P00.04	Red line and views updated	13/02/26	TB
P00.05	Views update	13/02/26	TB
P01	Additional views added	15/05/26	TB

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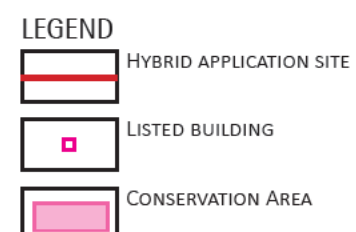
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Figure 2: Aerial Photograph



representative views were taken for inclusion in this document. The Site visit was undertaken with the ZTVs and background research to hand and with consideration of the proposals being considered on the Site.

- 1.9 The height and density of development will vary across the masterplan as illustrated by Figure 1. But for the purposes of the ZTV a proposed development height of 15.5m has been tested across the masterplan area.
- 1.10 The parameters will be finalised as the masterplan evolves through the planning process and the ZTV will be updated for a future planning application as part of a full Landscape and Visual Impact Assessment (LVIA).
- 1.11 The LVIA would provide a comprehensive analysis of the planning policy relevant to the Site and would be carried out in accordance with a methodology which aligns with the latest Guidance, including:
 - The Landscape Institute's Guidance for Landscape and Visual Impact Assessment (GLVIA 3),
 - An Approach to Landscape Character Assessment, October 2014, Natural England
- 1.12 It will also consider any additional relevant resources or Design Guidance put forward by Horsham District Council

Site Location and Context

- 1.13 The Site is a broadly square stretch of countryside from west to east that abuts Stane Street (A29) which passes through Adversane and links the settlements of Billingshurst to Pulborough. The settlement boundary of Billingshurst lies approximately 3km to the north and Pulborough is approximately 3.5km to the south. The South Downs National Park (SDNP) lies approximately 1.5km to the south west.

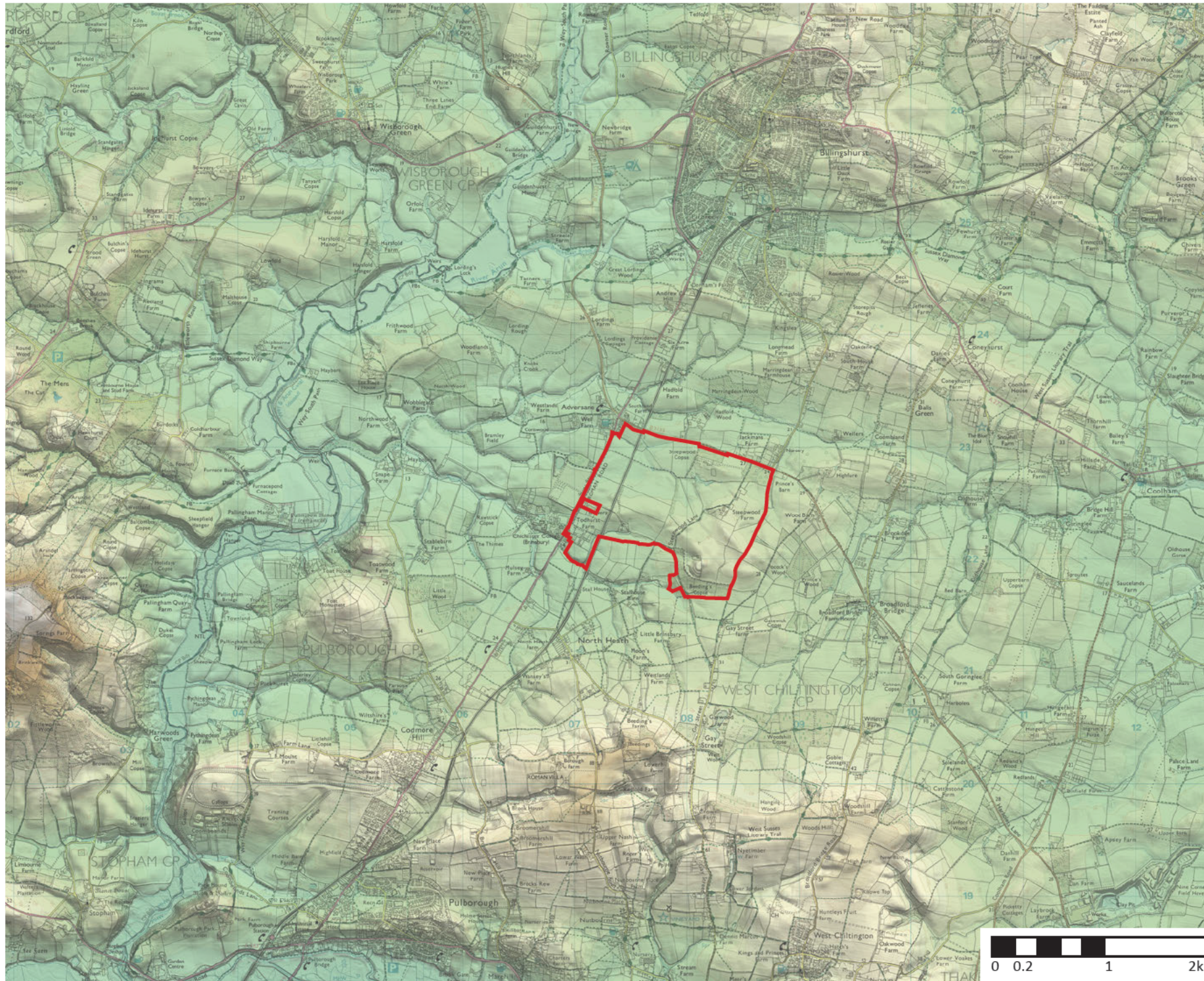


Figure 3: Topography Plan

2.0 ANALYSIS

Terrain Analysis

- 2.1 A topographical analysis of the Study Area demonstrates that the Site is located on relatively level ground which generally slopes down from east to west towards the river Arun.
- 2.2 Some areas have locally steeper topography, mainly in the south east around Steepwood Lane where there is also a high point.
- 2.3 Land within the immediate context of the Site is also relatively level. However, beyond 1-2Km the land generally rises, notably steeply in the south and south west and more gently in the north.

LEGEND

Elevation Shading [metres AOD]

<= 5	60 - 65	120 - 125
5 - 10	65 - 70	125 - 130
10 - 15	70 - 75	130 - 135
15 - 20	75 - 80	135 - 140
20 - 25	80 - 85	140 - 145
25 - 30	85 - 90	145 - 150
30 - 35	90 - 95	> 150
35 - 40	95 - 100	
40 - 45	100 - 105	
45 - 50	105 - 110	
50 - 55	110 - 115	
55 - 60	115 - 120	

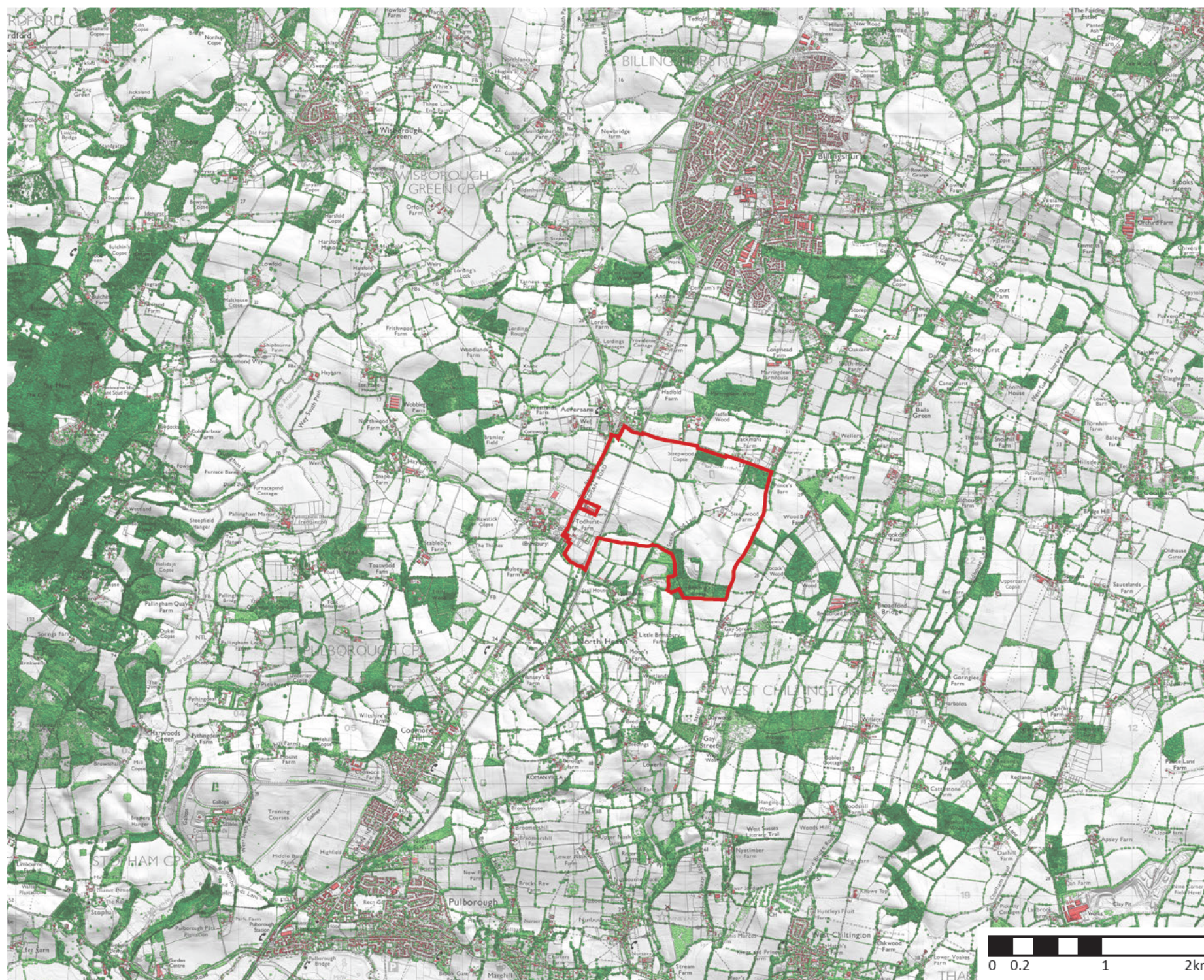


Figure 4: Buffer Plan

Buffer Analysis

- 2.4 An analysis of buffers which includes hedgerows, shaws, trees, woodland, buildings and built -up areas reveals a strong and dense pattern of vegetated field boundaries with areas of woodland across the Site and the wider landscape

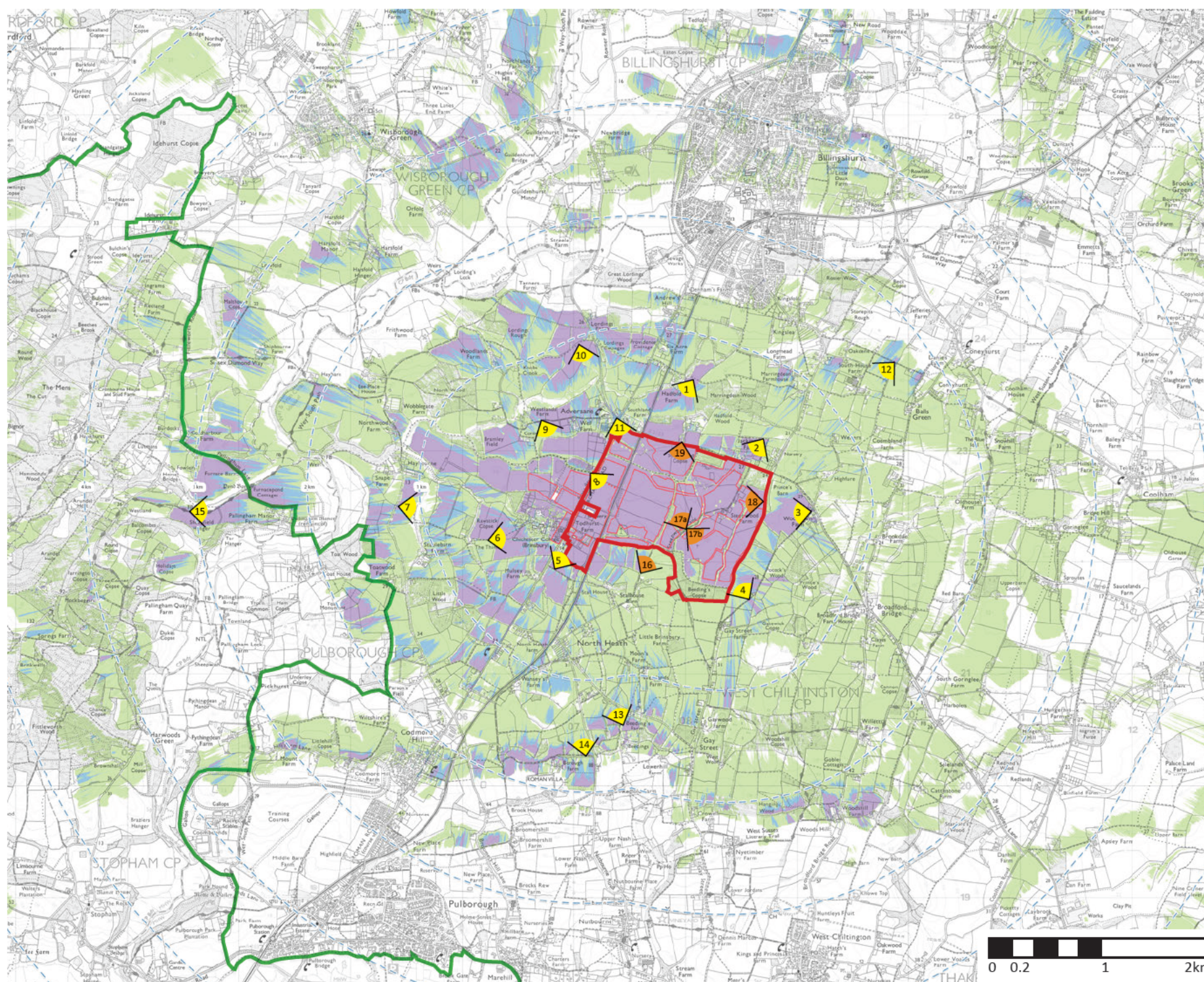


Figure 5: ZTV for Hybrid Application Site

Zone of Theoretical Visibility (ZTV)

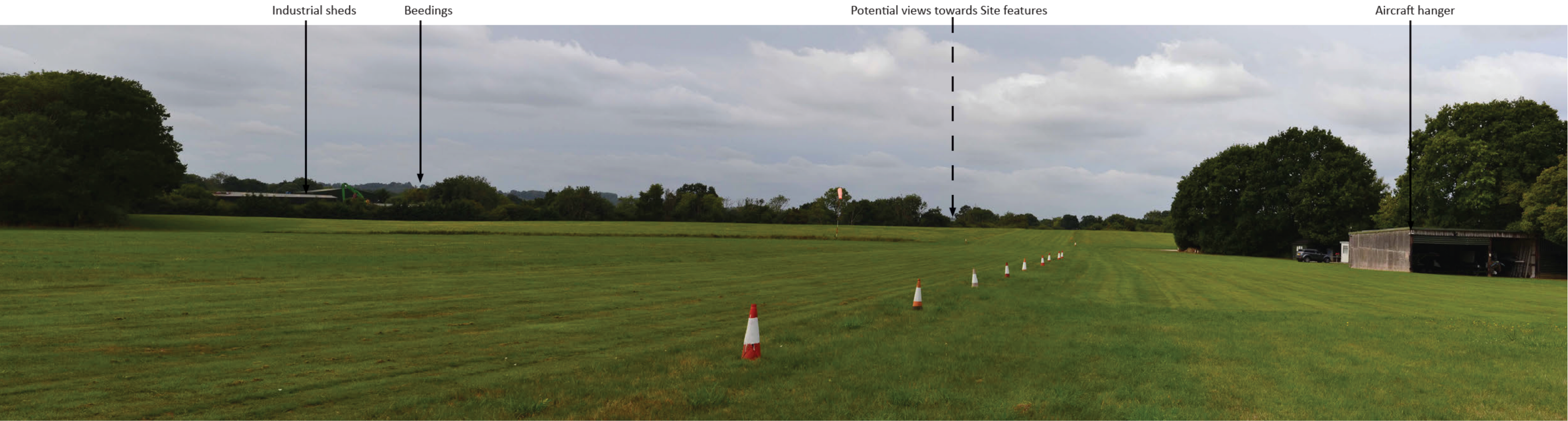
- 2.5 The ZTV (Figure 5) considers the topography and surrounding buffers (vegetation and build form). View locations have then been selected from the most sensitive of receptors including, PRoW, heritage assets and nearby residential properties.
- 2.6 The adjacent ZTV plan shows where at least one reference point representing the Site proposals will be visible. Areas of purple indicate the highest level of visibility where parts of the Site and or its proposals will be seen and areas of blue where those parts of the Site and its proposals will be either partially visible or glimpsed. Areas of green indicate the potential for filtered views in winter months when the vegetation is limited.
- 2.7 The ZTV indicates that majority of views are expected to be within the immediate landscape around the Site. There is also the potential for views from areas of higher ground to the south, west and north, but these are generally beyond 1km.
- 2.8 The Site and wider landscape was visited based upon this ZTV analysis and a selection of views are provided on the following pages and include those from within 1km of the Site (near distance) and 2km to 3km (mid distance). It was difficult to see the Site in views beyond 1km as expected by the limited visibility indicated by the ZTV. The topography and mature vegetation within the landscape restrict views beyond 3km.
- 2.9 Following consultation with Horsham District Council additional views have been requested from PRoW within and nearby the Site and from Adversane Lane.

LEGEND

	HYBRID APPLICATION SITE		1KM DISTANCE OFFSETS FROM THE SITE BOUNDARIES
	LAND FROM WHICH THE PROPOSED DEVELOPMENT WILL BE VISIBLE		SOUTH DOWNS NATIONAL PARK (SDNP)
	LAND FROM WHICH THE PROPOSED DEVELOPMENT WILL HAVE PARTIAL OR GLIMPSED VIEWS		VIEW LOCATIONS
	LAND FROM WHICH THE PROPOSED DEVELOPMENT MAY HAVE FILTERED VIEWS IN WINTER MONTHS		ADDITIONAL VIEW LOCATIONS REQUESTED BY HDC

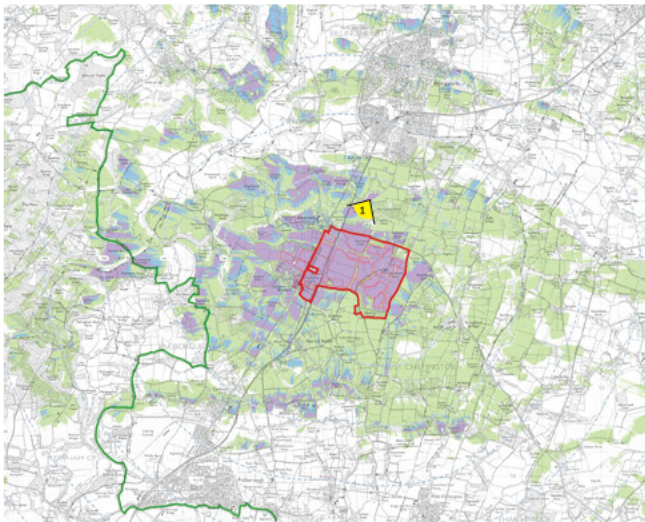
3.0 KEY VIEWS

Near Distance Views (Within 1km)



VIEW 1: PRow (BIL 1320/3) at Hadfold Farm Airstrip

- 3.1 View 1 is approximately 500m north of the Site, part way along the PRow. The experience on the PRow varies along the route which follows an east-west alignment and includes a busy road, railway line, isolated properties, some light industrial use an airstrip all within the context of agricultural land. Part of the mature vegetation within the Site and its boundaries is only visible form a short section of the PRow as it crosses the grass airstrip. The users attention will divert to the airstrip but otherwise will be focused on the route ahead of them and not towards the Site.
- 3.2 The proposed development has the potential to be visible, but will be in the context of the heavily treed landscape. It will not significantly detract from any high scenic quality.
- 3.3 View 1 is representative of near distance views.



Key Plan (NTS)

Near Distance Views (Within 1km)

Woodland on northern boundaries of Site

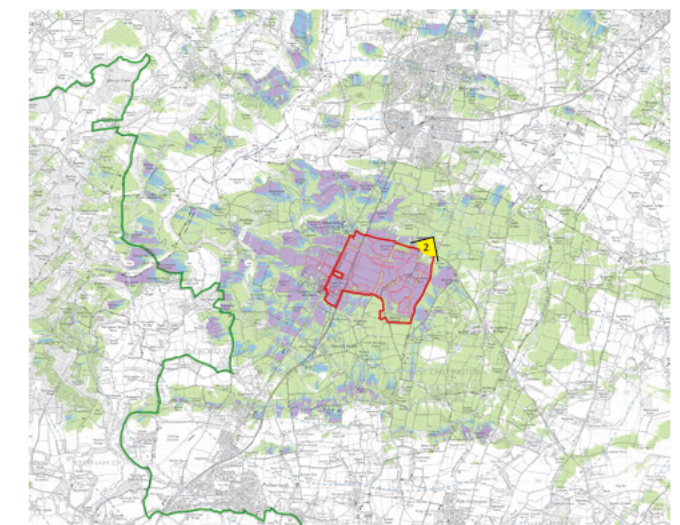
Area for highest potential to see the proposal

Woodland on northern boundaries of Site



VIEW 2: PRoW (BIL 1323/1) at Jackmans Farm

- 3.4 View 2 is approximately 100m north of the Site, part way along this PRoW which zig-zags north from Adversane Lane following mature field boundaries. The experience along the PRoW varies along the route and includes a busy rural road, isolated properties, paddocks and woodland and is a generally well enclosed route. Part of the mature vegetation within the Site and its boundaries is only visible from a short section of the PRoW around Jackmans Farm. The users attention is focused on the route of the PRoW.
- 3.5 The proposed development has the potential to be visible, particularly between the two blocks of woodland, but will be in the context of the heavily treed landscape and isolated residential and farm buildings along Adversane Lane. It will not detract from any high scenic quality.



Key Plan (NTS)

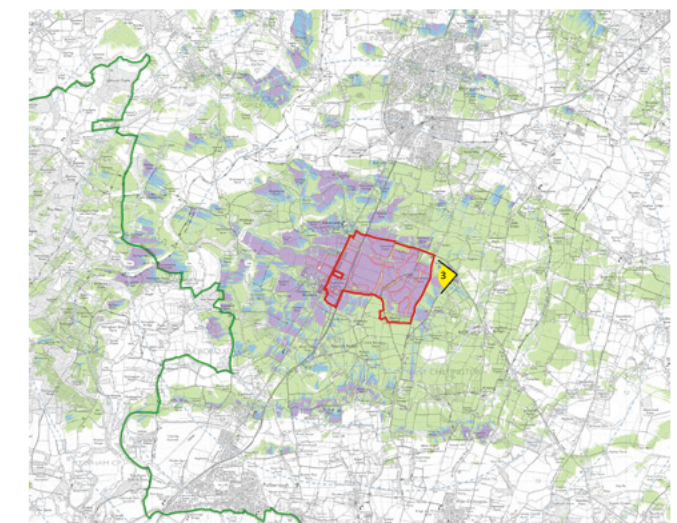
Near Distance Views (Within 1km)



VIEW 3: PRoW (WEC 2324/1) at Wood Barn Farm

- 3.6 View 3 is approximately 400m east of the Site and is representative of the narrow and glimpsed views from the public rights of way that run parallel to the Sites eastern boundary (the other WEC 2300/2 is adjacent to the eastern boundary) through a largely pastoral landscape with isolated farms and agricultural buildings. It is also representative of views that residents will have from Wood Barn Farm.
- 3.7 The mature vegetation along the Site boundaries are visible along the northern and southern sections of this PRoW with topography screening views in the central section. There are views of the Site and farm buildings through gaps in the boundaries which is most notable at Wood Barn Farm where a restricted but long view is possible in to part of the Site at Steepwood Farm.

- 3.8 There will be a notable change within these views with the proposed development. However appropriate landscape mitigation could be incorporated to screen the development.



Key Plan (NTS)

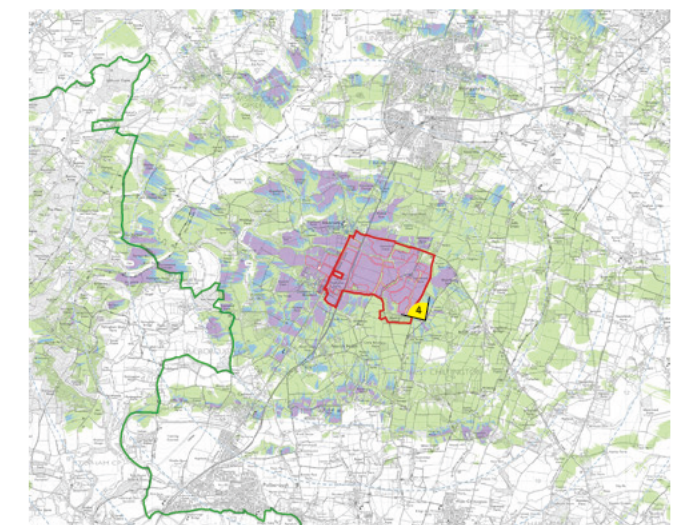
Near Distance Views (Within 1km)

Glimpsed view of part of the Site



VIEW 4: PRoW (WEC 2324/1) at Gay Street Farm

- 3.9 This view is from the southern section of the PRoW and views of the Site are generally more restricted by the intervening mature vegetation.
- 3.10 Refer to the View 3 for further commentary.



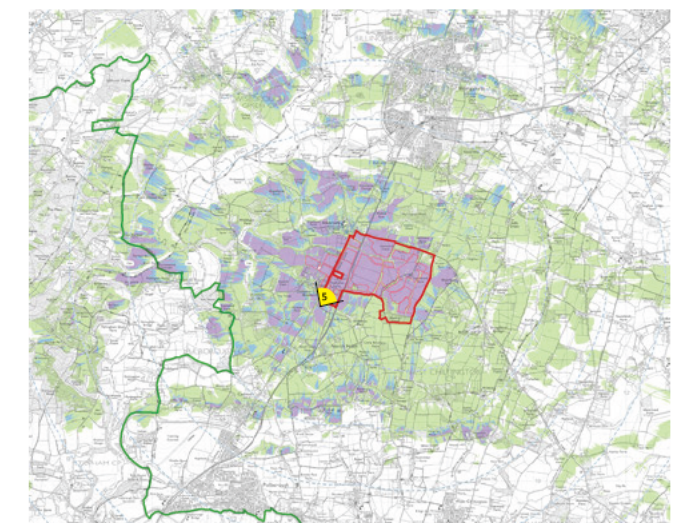
Key Plan (NTS)

Near Distance Views (Within 1km)



VIEW 5: PRoW (PUL 1998/1)

- 3.11 View 5 is approximately 50m south of the Site and is representative of the narrow and glimpsed view from the PRoW that runs parallel to the Sites southern boundary through a largely pastoral landscape with isolated farms and agricultural buildings.
- 3.12 The view is oblique and largely screened by the mature boundary vegetation, except for a gap where large agricultural sheds can be seen. There is potential for a notable change in views depending on the proposals for this southern parcel, but appropriate mitigation could screen this.



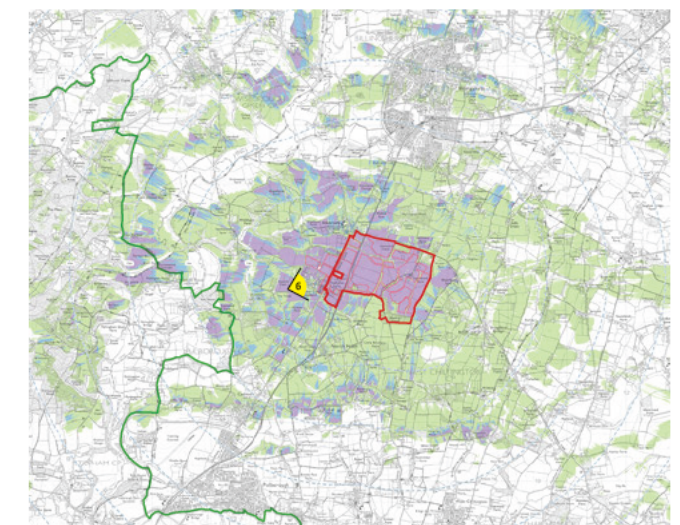
Key Plan (NTS)

Near Distance Views (Within 1km)



VIEW 6: PRoW (PUL 1984/1) The Thines

- 3.13 This view is taken from the PRoW as it passes through Brinsbury Campus. The Site is not visible from this point but would come into view as the PRoW approaches the A29 and the Sites western boundary. The campus buildings which can be seen through the mature trees range from agricultural, educational and to residential which give the sense of an urban rural/edge location.
- 3.14 Users are unlikely to experience a change in the view along the majority of this PRoW but will become aware of the proposals as they approach the A29. This will be experienced in the context of the campus.



Key Plan (NTS)

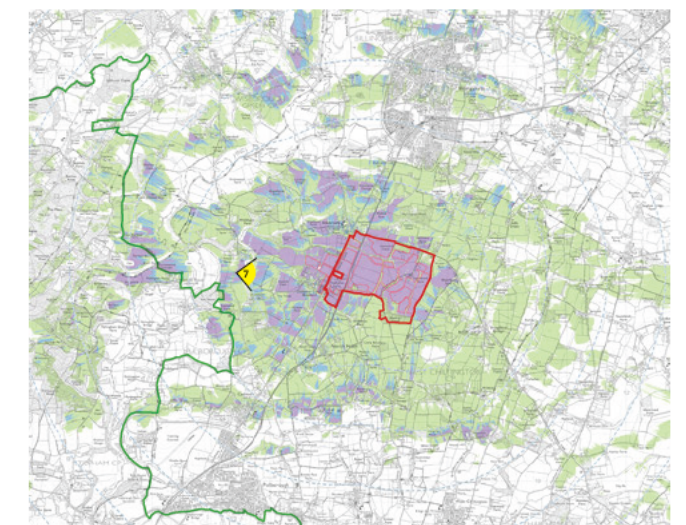
Near Distance Views (Within 1km)

Site not visibel beyond the horizon



VIEW 7: PRoW (PUL 1984/2) Black Gate Lane

- 3.15 This view is taken from the PRoW at Black Gate Lane. The Site is not visible as the mature field boundaries prevent long views.
- 3.16 Users are unlikely to experience a change in views along this section of the PRoW.



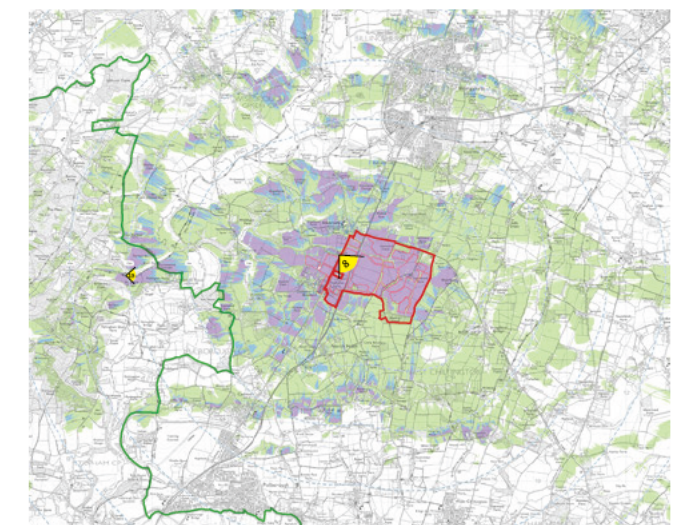
Key Plan (NTS)

Near Distance Views (Within 1km)



VIEW 8: PRoW (BIL 1305/2) Adversane Caravan Park

- 3.17 This PRoW west of the Site is generally well enclosed by boundary hedges and views out are limited. The Site is mainly experienced as the PRoW meets the A29 with a panoramic view either over the clipped boundary hedge or filtered through it. Part of this route sits alongside a caravan park.
- 3.18 Users would experience a notable change at this point of the PRoW especially in winter views as they emerge on to the A29. However there is potential to provide appropriate mitigation.



Key Plan (NTS)

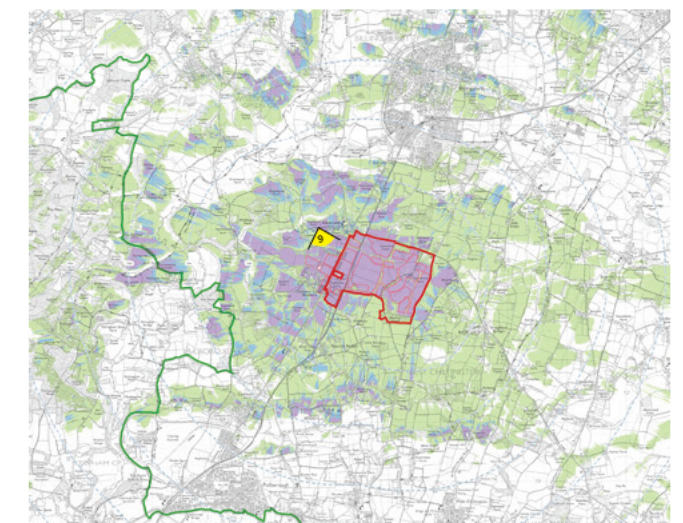
Near Distance Views (Within 1km)

Potential glimpsed views of mature trees/hedgerows on Site in distance



VIEW 9: PRoW (BIL 1301/1) Well Farm

- 3.19 View 9 is approximately 500m northwest of the Site, part way along this PRoW which follows an east - west route from Adversane. The experience along the PRoW varies along the route and includes a busy road junction at Adversane, the village and its buildings, pastoral fields and isolated farm. It is difficult to see the Site, but part of the mature vegetation within the Site is potentially visible in the distance.
- 3.20 The proposed development has the potential to be visible, but will be in the context of the heavily treed landscape and isolated residential and farm buildings along this route. It is unlikely to detract from any high scenic quality.



Key Plan (NTS)

Near Distance Views (Within 1km)

Glimpsed views of mature trees/hedgerows on Site

Beedings

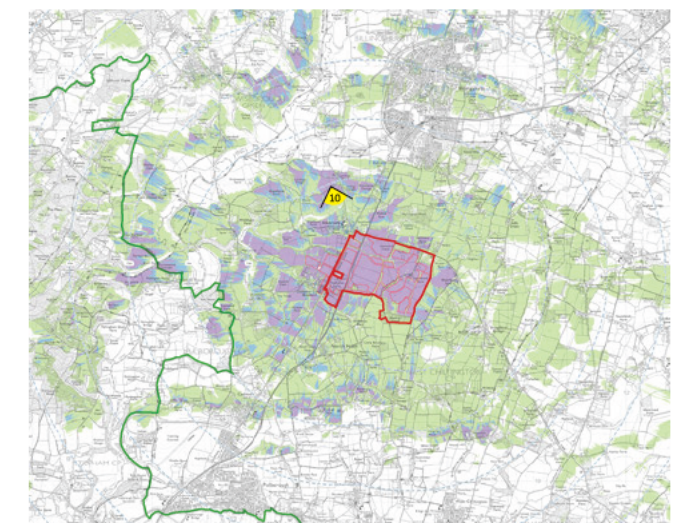
Farm buildings

Toat Monument and SDNP



VIEW 10: PRow (BIL 1304/2) Lordings Farm

- 3.21 View 10 is approximately 800m north of the Site, part way along this PRow which follows an east - west route from Stane Street. The experience along the PRow varies along the route and includes a busy 'A' road, arable fields and isolated farms. It is difficult to see the Site, but part of the mature vegetation within the Site is visible.
- 3.22 The proposed development has the potential to be visible, but will be in the context of the heavily treed landscape and isolated residential and farm buildings along this route. It is unlikely to detract from any high scenic quality although the SDNP and Toat Monumnet forms part of the panoramic view.



Key Plan (NTS)

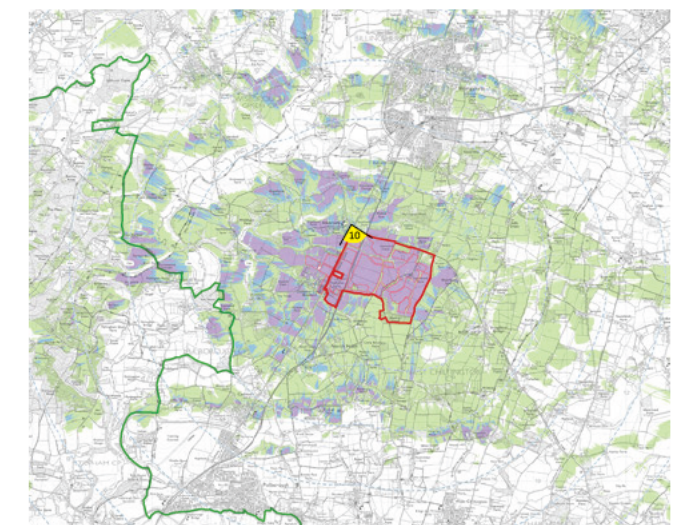
Near Distance Views (Within 1km)

Vegetation on northern boundary of Site



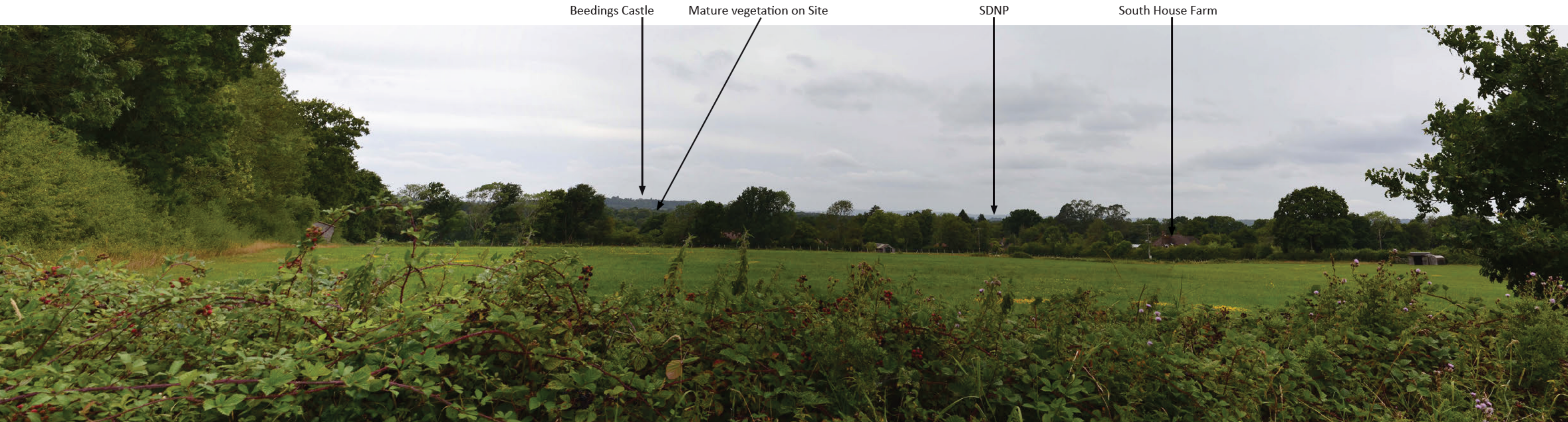
VIEW 11: Residents in Adversane (Conservation Area)

- 3.23 View 11 is representative of views residents will have from Adversane which is a Conservation Area and borders the Site. Residents closest to the Site and in particular along Adversane Lane will experience a notable change in the views, while the change will be less from within the centre of the village where this photograph was taken.
- 3.24 The proposals have the potential to be sympathetically integrated into the edge of Adversane where built form in views is already a key element.



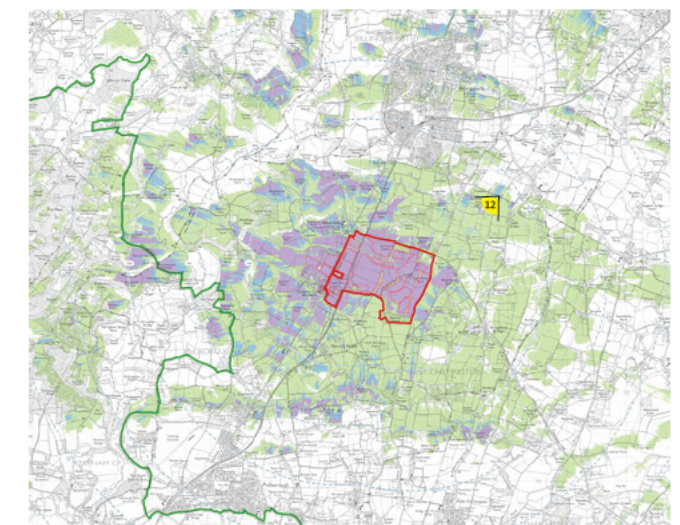
Key Plan (NTS)

Mid Distance Views (Within 2-3km)



VIEW 12: PRoW (BIL 1927/3) Balls Green

- 3.25 View 12 is over 1.5km from the Site boundary along this PRoW which follows an east-west route. The PRoW is partly at a higher elevation than the majority of the Site which allows partial and glimpsed views of mature vegetation on the Site.
- 3.26 Residential properties and farm buildings can be seen through the vegetation in the mid ground. High points at Beedings and within the SDNP are glimpsed on the horizon, but much of the view is screened by intervening trees and mature hedgerows.
- 3.27 The proposed development has the potential to be partly visible, but will be in the context of the heavily treed landscape and isolated residential and farm buildings in the mid-ground. It is unlikely to detract from any high scenic quality.



Key Plan (NTS)

Mid Distance Views (Within 2-3km)

Toat Monument within the SDNP

The Site

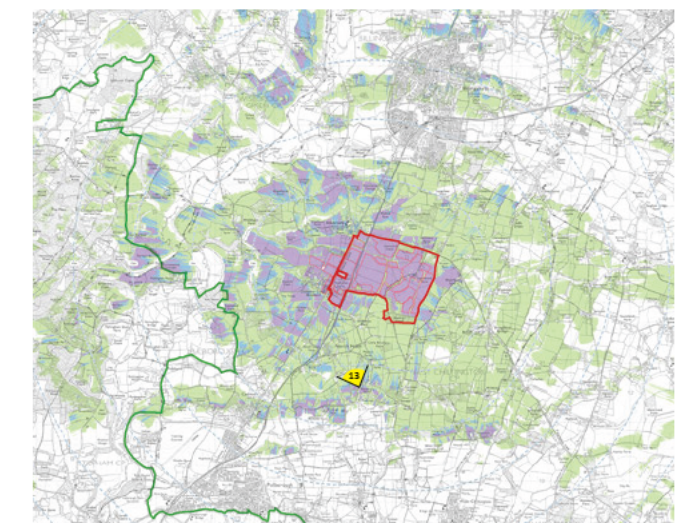
Architectural Plants



VIEW 13: PRoW (PUL 2318/1) Beeding's Farm

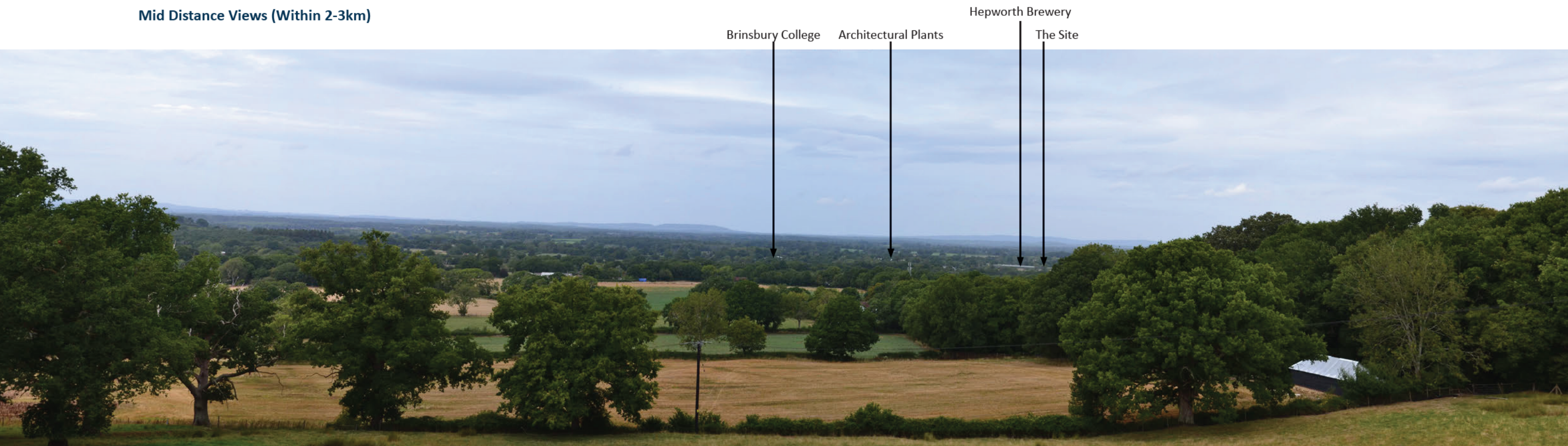
- 3.28 View 13 is over 1.5km from the Site boundary along this PRoW which follows north-south route from high to low ground, south of the Site. There is a restricted and glimpsed view of parts of the Site near Stane Street in the mid distance which mainly consist of the Sites mature trees and hedgerows. Views are generally well screened by the topography and mature vegetation within the landscape.
- 3.29 The SDNP and the Toat Monument are recognisable features on the horizon and there are glimpsed views of residential properties and agricultural buildings amongst the heavily treed landscape.
- 3.30 The proposed development will be partly visible, but in the context of the heavily treed landscape and isolated residential and farm buildings in the mid-ground. It is unlikely to detract from any high scenic quality in the long-term, but appropriate mitigation planting

and heights of proposed buildings should be carefully considered to maintain a balance of elements within the view.



Key Plan (NTS)

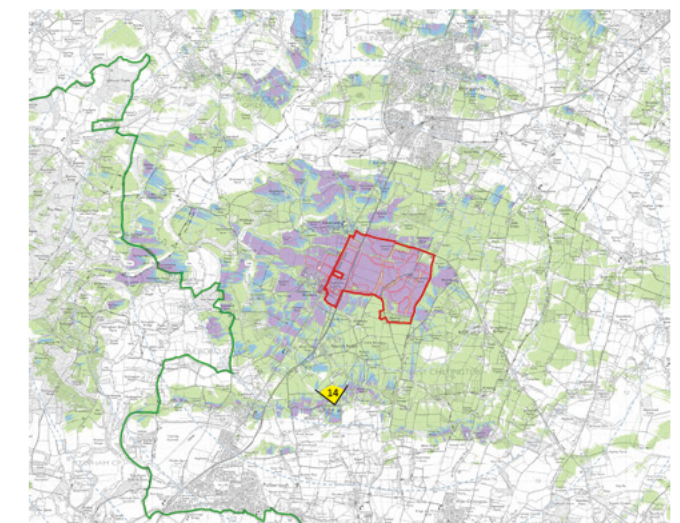
Mid Distance Views (Within 2-3km)



VIEW 14: PRoW (PUL 2311/1) Borough Farm

- 3.31 View 14 is over 1.8km from the Site boundary along this PRoW which follows an east-west route along a ridge of high ground south of the Site. There are restricted and glimpsed views of parts of the Site near Stane Street in the middle distance which mainly consist of the Sites mature trees and hedgerows. Views are generally well screened by the topography and mature vegetation within the landscape.
- 3.32 There are glimpsed views of residential properties and agricultural buildings amongst the heavily treed landscape. The SDNP and Surrey Hills National Landscape are recognisable features on the distant horizon
- 3.33 The proposed development will be partly visible, but will be in the context of the heavily treed landscape and isolated residential and farm buildings in the mid-ground. It is unlikely to detract from any

high scenic quality in the long-term, but appropriate mitigation planting and heights of proposed buildings should be carefully considered to maintain the elements within the view.



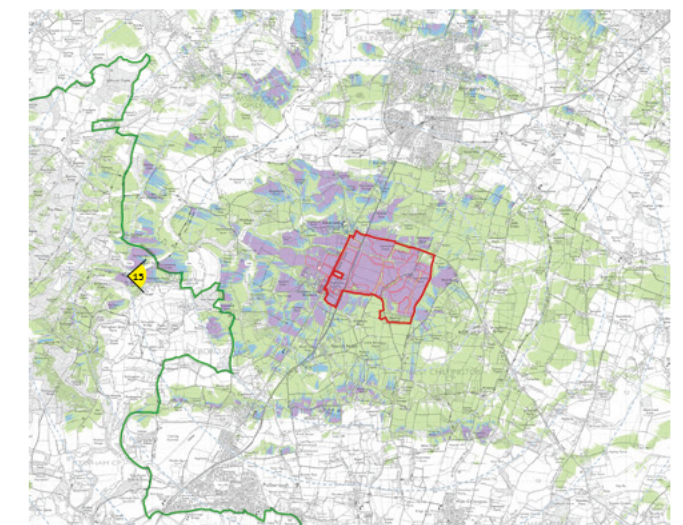
Key Plan (NTS)

Mid Distance Views (Within 2-3km)



VIEW 15: Wey-South Path PRoW (WIG 773/6)

- 3.34 This view is over 3km from the Site and representative of views from within publicly accessible areas of the SDNP. It was not possible to identify the Site or its features. Toat Wood, mature field boundaries and the topography screen views to the Site.
- 3.35 The proposals are unlikely to detract from any high scenic quality.



Key Plan (NTS)

Additional Requested Views

Mature trees on southern boundary of the Site

Site

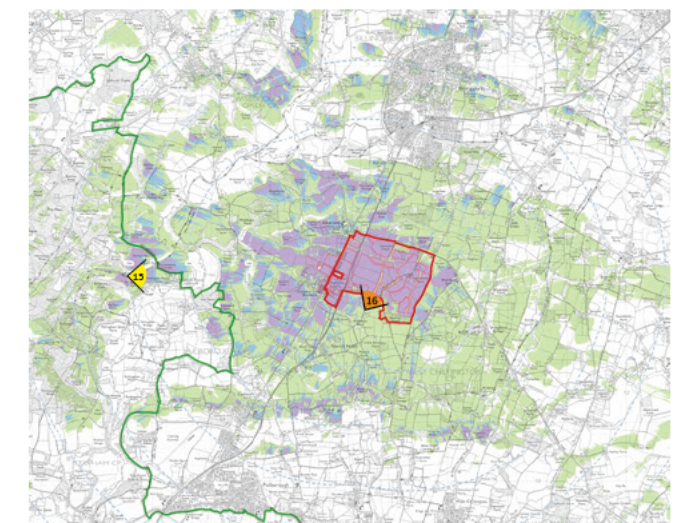
Bridleway (PUL 2299/1)



VIEW 16: PRoW (PUL 2299/1 and WEC 2299/3)

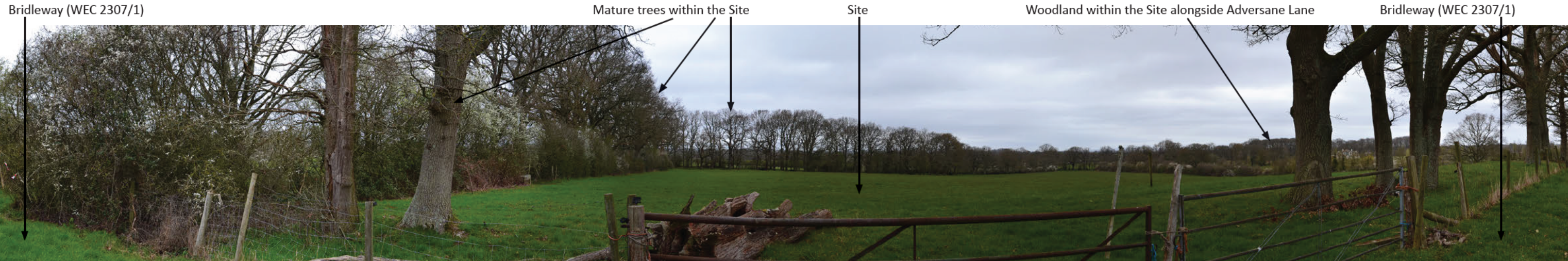
- 3.36 This view is approximately 250m south of the Site looking in a north to north westerly direction along the bridleway through a rural landscape. The western parts of the Site (green fields) and associated hedgerows form the horizon. The view is glimpsed through gaps in the hedgerows along the bridleway and the southern boundary of the Site. The mature woodland screens any views of the eastern areas of the Site.
- 3.37 The view is experienced along the middle section of the bridleway, with increased filtering of views closer to the Site. Further filtered views are possible where the bridleway runs parallel to the Site boundary.
- 3.38 There will be a notable change within these views with the proposed development. However appropriate landscape mitigation could be

incorporated to increase the filtering of views although it is unlikely to be completely screened from all vantage points.



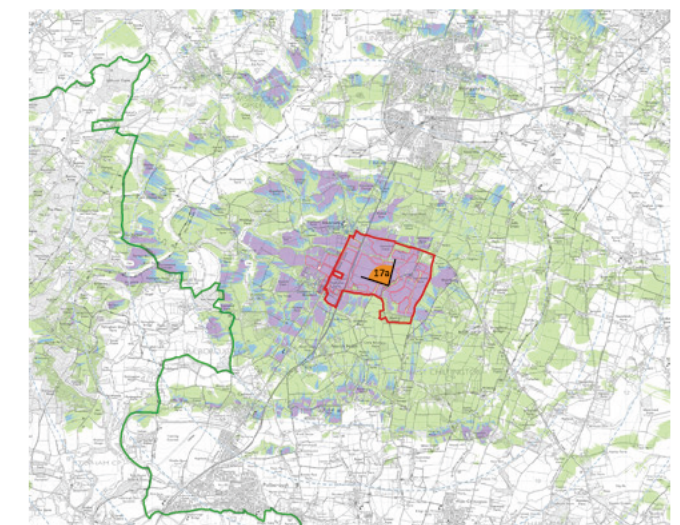
Key Plan (NTS)

Additional Requested Views



VIEW 17a: PRow (WEC 2307/1)

- 3.39 This view is from within the Site looking west from the bridleway. Views are largely open and panoramic over paddocks, but existing mature hedgerows and tree belts often contain and restrict longer views.
- 3.40 The bridleway passes through the Site, south to north through a rural and semi parkland landscape. The mid to northern section passes through Steepwood Farm and its associated yard, buildings and machinery. There are occasional longer views, especially from higher points to the distant landscape.
- 3.41 There will be a notable change within these views with the proposed development. Landscape mitigation could be incorporated to include development offsets and buffers to soften the transition to built form.



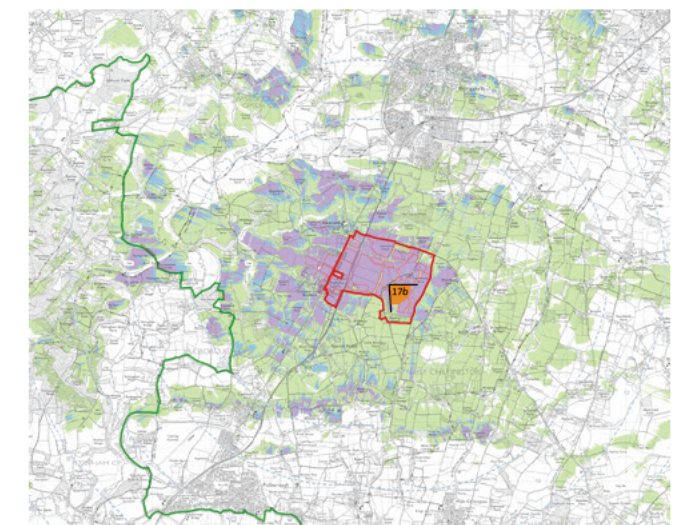
Key Plan (NTS)

Additional Requested Views



VIEW 17b: PRoW (WEC 2307/1)

- 3.42 This view is from within the Site looking east from the bridleway. Views are largely open and panoramic over paddocks, but existing mature hedgerows, tree belts and topography often contain and restrict longer views.
- 3.43 The bridleway passes through the Site, south to north through a rural and semi parkland landscape. The mid to northern section passes through Steepwood Farm and its associated yard, buildings and machinery. There are occasional longer views, especially from higher points to the distant landscape.
- 3.44 There will be a notable change within these views with the proposed development. Landscape mitigation could be incorporated to include development offsets and buffers to soften the transition to built form.



Key Plan (NTS)

Additional Requested Views

Bridleway (WEC 2300/2)

Site

Steepwood Farm

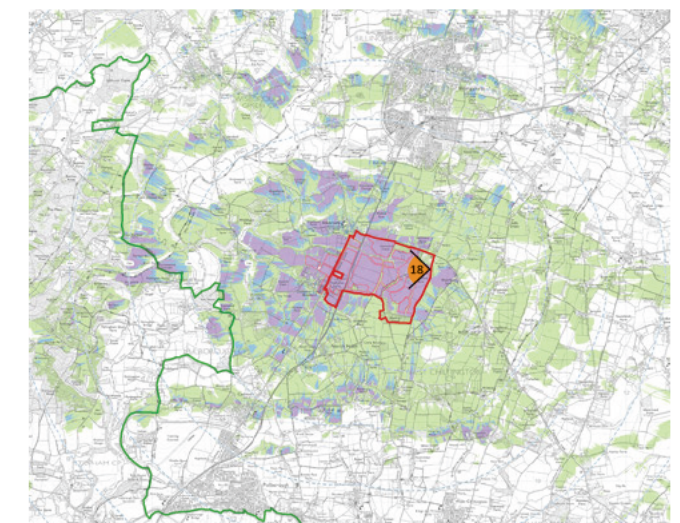
Steepwood Lane (Bridleway WEC 2307/1)

Mature woodland on Site



VIEW 18: PRoW (WEC 2300/2)

- 3.45 This view is from within the Site looking west from the bridleway. Views are largely open and panoramic over and through a semi parkland landscape, except towards the south where the bridleway falls outside of the Site and a mature hedgerow filters views.
- 3.46 Blocks of woodland at the north eastern and south eastern corners of the Site largely screen views. Mature hedgerows, tree belts and topography often restrict longer views including views of the western areas of the Site. Steepwood Farm is visible from northern sections of the bridleway.
- 3.47 There will be a notable change within these views with the proposed development. Landscape mitigation could be incorporated to include development offsets and buffers to soften the transition to built form.



Key Plan (NTS)

Additional Requested Views

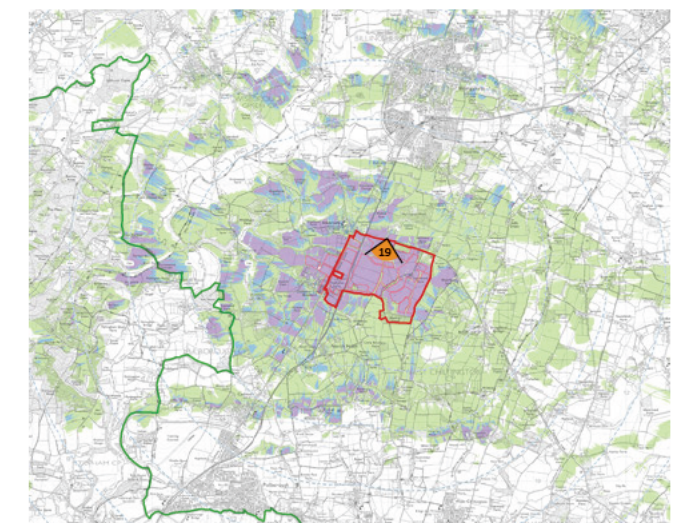


VIEW 19: Adversane Lane (Oak View)

- 3.48 This view is from Adversane Lane and representative of views from road users and residents at Oak View along the mid section of Adversane Lane alongside the Site boundary. The mature boundary hedge filters and screens views from low seated vehicles and ground floor windows but views are largely open and panoramic from higher seated vehicles and first floor windows.
- 3.49 Mature hedgerows, tree belts and woodland often restrict any distant views which are largely contained to the fore-ground and mid-ground. The relatively busy road and its traffic is a notable feature.
- 3.50 Further east, dwellings within Adversane prevent any views of the Site and the mature woodland and tree belts largely screen any views between Steepwood Copse to the junction with Marringdean

Road.

- 3.51 There will be a notable change within these views with the proposed development. Landscape mitigation could be incorporated to include development offsets and buffers to filter and screen views.



Key Plan (NTS)

4.0 CONCLUSION

- 4.1

This note was prepared as the first step of understanding the potential visual effects associated with the proposed masterplan of Kingswood Village. Its is intended to be a working document to inform the ongoing evolution of the masterplan and for engagement with the relevant stakeholders and Horsham District Council (HDC).
- 4.2

It is prepared on the basis of an initial concept masterplan with defined areas of residential, employment, education and open space uses. In coordination with the design team it assumes certain building heights based upon the density within each area of the masterplan areas.
- 4.3

This pre-application note has selected views that are considered most representative of the range of visual effects likely to be experienced across the Study Area and are not exhaustive. HDC and the SDNP have been consulted to provide comment on the suggested views, with HDC requesting the additional views (16 to 19). It may be necessary to engage with the parish councils of Billingshurst, Pulborough and West Chiltington where near distance views will be experienced.
- 4.4

The most notable visual effects will be experienced by residents and users of public rights of way within the Site boundaries or in close proximity to them. These are generally within 0.5km of the Site, where the mature vegetation across the landscape has less of a screening effect.
- 4.5

Views beyond this tend to be from the higher ground to the south including the SDNP and are generally restricted by the topography and mature vegetation across the wider landscape and the Site. Views from within publicly accessible areas of the SDNP are greatly restricted and it is unlikely there would be significant residual adverse effects on any highly scenic views within the area.
- 4.6

Notwithstanding the Site and the immediate receptors, it can be concluded that the proposals have the potential to be introduced without any significant harm to the visual amenity of the wider landscape.
- 4.7

Although the masterplan is in concept form, it proposes a well designed and high quality environment that will create beautiful and attractive places to live, contributing positively to views. It also demonstrates that landscape mitigation could be provided as part of the proposals to limit any local effects where they are considered necessary.