
Ansty Garden Community

Environmental Statement

Volume 2

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CHAPTER 3: EIA METHODOLOGY

3 EIA Methodology

3.1 Introduction

3.1.1 The EIA Regulations require that an EIA be undertaken for the Proposed Development and Parkland Reserve Site, and that an ES identifying impacts and associated mitigation measures must be provided to accompany the planning application.

3.1.2 For the purposes of the EIA Regulations, Regulation 18 (3) defines an environmental statement as:

"...a statement which includes at least:

- (a) a description of the proposed development comprising information on the site, design, size and other relevant features of the development;*
- (b) a description of the likely significant effects of the proposed development on the environment;*
- (c) a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;*
- (d) a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;*
- (e) a non-technical summary of the information referred to in sub-paragraphs (a) to (d); and*
- (f) any additional information specified in Schedule 4 relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected."*

3.1.3 Temple has been commissioned by the Applicant to prepare the EIA in line with the EIA Regulations and the other relevant EIA guidance and to produce this ES which is submitted with the planning application.

3.1.4 The Applicant has provided the necessary information to enable preparation of this ES. The ES will ensure that sufficient information is provided to enable Mid Sussex District Council (MSDC) to make a decision about the planning application with due regard to and in the knowledge of any likely significant environmental effects.

3.1.5 This chapter sets out the methodology used to prepare each chapter of the ES and describes the general structure and content of the technical chapters. In

particular, it sets out the process of identifying and assessing the likely significant effects of the Proposed Development and Parkland Reserve Site on the environment.

3.1.6 Further detail on how the assessment methodology is applied to each technical topic scoped into this ES is presented within the respective technical chapter or volume of this ES.

3.1.7 The ES has been prepared to comply with the EIA Regulations¹ which implement European Council Directive 2014/52/EU. The ES has also drawn on current good practice guidance in EIA, including (but not limited to) the following:

- National Planning Policy Framework (NPPF)² and associated Planning Practice Guidance³;
- The Institute of Environmental Management and Assessment's (IEMA's) 'Guidelines for Environmental Impact Assessment'⁴;
- Environmental Impact Assessment: A Guide to Good Practice and Procedures (consultation paper)⁵;
- IEMA's 'Special Report into the State Environmental Assessment Practice in the UK'⁶;
- IEMA's 'Shaping Quality Development'⁷;
- IEMA's 'Delivering Proportionate EIA'⁸;
- IEMA's 'Major Accidents and Disasters in EIA'⁹;
- IEMA's 'Effective Scoping of Human Health in Environmental Impact Assessment'¹⁰; and

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571).

² MHCLG, (2023); National Planning Policy Framework.

³ MHCLG, (2021); planning Practice Guidance.

⁴ IEMA, (2004); Guidelines for Environmental Impact Assessment.

⁵ Department for Communities and Local Government (DCLG), (2006); Environmental Impact Assessment: A Guide to Good Practice and Procedures (consultation paper).

⁶ IEMA, (2011); Special Report into the State Environmental Impact Assessment Practice in the UK.

⁷ IEMA, (2015); Shaping Quality Development.

⁸ IEMA, (2017); Delivering Proportionate EIA.

⁹ IEMA, (2020); Major Accidents and Disasters in EIA.

¹⁰ IEMA, (2022); Effective Scoping of Human Health in Environmental Impact Assessment.

- IEMA's 'Assessing Greenhouse Gas Emissions and Evaluating their Significance'¹¹.

3.2 EIA Scoping and Consultation

3.2.1 Potential environmental topics in relation to the Proposed Development and Parkland Reserve Site were evaluated, having regard to the EIA Regulations, policy, best practice and relevant guidance, as part of the scoping exercise. The scope of the EIA was then determined using professional judgement and experience. This has been carried out to confirm which topics should be included in the EIA, having regard to whether they are likely to give rise to significant effects.

3.3 The Environmental Statement Approach

Approach to the Sites

- 3.3.1 As noted in **Chapter 1: Introduction** of this ES, a separate outline planning application for Beechy Bottom Parkland Reserve (the "Parkland Reserve Site") is being submitted in parallel to the planning application for the Proposed Development. The planning application for the Parkland Reserve Site will comprise the change of use of farmland and woodland to parkland reserve to include public access and instigation of long-term management and rewilding regime, including establishment of pedestrian and cycle tracks, with new pedestrian and cycle access points off Cuckfield Road to the south and Staplefield Road to the north; proposals to include the addition of two wooden viewing platforms; and sports pitches at Beech Farm Field to remain in sports use. It is the intention for the Parkland Reserve Site to deliver off-site Biodiversity Net Gain (BNG) provision for the Ansty Garden Community planning application; as such, the planning applications are inter-linked and one would not come forward without the other. As a result, the EIA and this ES have considered both planning applications holistically.
- 3.3.2 The proposed development on the Parkland Reserve Site (as outlined above) is minimal and of a positive impact; therefore, whilst both the Site and the Parkland Reserve Site have been considered throughout, the combined effect of both schemes will be unlikely to change the assessed effects in most cases, from considering the Site in isolation. However, where the consideration of both schemes has altered the assessed effect, this is clearly presented in the

¹¹ IEMA, (2022); Assessing Greenhouse Gas Emissions and Evaluating their Significance.

technical chapters. Where no change in effect is anticipated, this is outlined in the relevant technical chapters' methodology.

Topics Scoped into the ES

- 3.3.3 The topics listed in **Table 3.1** below have been considered likely to have the potential to generate significant effects as a result of the Proposed Development and the Parkland Reserve Site; therefore, they have been scoped into the ES.
- 3.3.4 **Section 3.4** of this chapter outlines the proposed approach to these topic assessments.

Table 3.1: Topics Scoped into the EIA

Scoped In Topic Chapters
Socio-Economics (Chapter 6)
Traffic and Transport (Chapter 7)
Air Quality (Chapter 8)
Noise and Vibration (Chapter 9)
Agriculture and Soils (Chapter 10)
Ecology and Biodiversity (Chapter 11)
Climate Change Mitigation and Adaptation (Chapter 12)
Built Heritage (Chapter 13)
Landscape and Visual Impact Assessment (Volume 3)

Topics to be Scoped Out of the ES

- 3.3.5 The following topics were scoped out of the ES as standalone chapters, as they were considered unlikely to have potential to generate significant effects as a result of the Proposed Development and Parkland Reserve Site:
 - Archaeology;
 - Water Resources, Drainage and Flood Risk;
 - Ground Conditions, Minerals and Contamination;
 - Human Health;
 - Major Accidents and / or Natural Disasters; and
 - Materials and Waste.
- 3.3.6 The following sections outline a summary of the justification for scoping the above listed topics out of the ES.

Archaeology

- 3.3.7 An archaeological desk-based assessment (ADBA), to assess the archaeological potential of the Site and to examine the likely impact of the Proposed Development on any identified archaeological resource was undertaken in December 2022. It was identified that the northern part of the Site lies within Cuckfield medieval park, which is recorded as an Archaeological Notification Area (ANA) (i.e. Cuckfield ANA). The majority of the Parkland Reserve Site (particularly the centre and south) is also located within the Cuckfield ANA.
- 3.3.8 The ADBA outlines the heritage potential (and associated significance) of the Site and surrounding area. The ADBA considers that there is the potential for as yet unknown heritage assets of archaeological interest to be present within the Site; however, given the absence of previous archaeological investigation at the Site, the possibility that as yet unknown remains (particularly from the medieval and post-medieval periods) may be present on the Site cannot be discounted.
- 3.3.9 The ADBA highlights that the significance of any heritage assets that may exist on the Site cannot be determined in advance on confirmatory fieldwork; however, the available evidence from the wider study area suggests that any buried deposits present are most likely to be of no more than local or regional significance.
- 3.3.10 Based on the research undertaken as part of the ADBA and given the absence of significant previous intrusive investigation at the Site, it is possible that the Proposed Development will reveal and potentially impact on as yet unknown archaeological deposits. As the degree of past impact on any such remains is currently unknown, any groundwork will be subject to a programme of archaeological evaluation (e.g. trial trenching) and mitigation (as a planning condition) to better determine the presence or absence of remains.
- 3.3.11 Following any archaeological evaluation, the results of such evaluation will assist in formulating an appropriate further mitigation strategy, should archaeological deposits be present. Should archaeological remains be present and confirmed to be of low (local) to moderate (regional) significance, further mitigation works such as a programme of archaeological excavation and recording will likely be required to ensure the preservation by record of any threatened remains.
- 3.3.12 In view of the above and assuming that the relevant mitigation measures would be secured by way of a suitably worded planning condition (where required) and implemented, it was considered that any potential effects on archaeological deposits during construction would be offset to some extent, through excavation, recording and dissemination of the results (i.e. preservation by record), to reduce the potential construction effects on archaeological deposits to not significant.

- 3.3.13 The mitigation measures are outlined in **Chapter 15: Residual Effects and Conclusions** of this ES.
- 3.3.14 During the operation of the Proposed Development, no further groundworks will be undertaken. There would, therefore, be no direct impacts on archaeological assets within the Site during the operational phase.
- 3.3.15 The majority of the Parkland Reserve Site (particularly the centre and south) is also located within the Cuckfield ANA. Since the Parkland Reserve Site is located directly to the north-west of the Site, it is considered that the available evidence from the wider study area also applies to the Parkland Reserve and that any buried deposits present are most likely to be of no more than local or regional significance.
- 3.3.16 Based on professional judgement, given that the proposed works on the Parkland Reserve Site are minimal and low impact, with no excavation works or construction of built form proposed, it is considered that there will not be any potential for likely significant effects during construction or operation on any potential archaeological deposits (which is further detailed in **Chapter 5: The Proposed Development and Construction Overview**).
- 3.3.17 Given the above, archaeology is not considered further within the EIA or reported on in this ES.

Water Resources, Drainage and Flood Risk

- 3.3.18 The Site is located within the valley of Copyhold Gill, a tributary of the River Adur. Copyhold Gill flows in a south-easterly direction between the northern and southern areas of the Site. The Copyhold Gill is a relatively minor watercourse with a catchment area of approximately 8.7 square kilometres (km²) at this location – it is a designated Ordinary Watercourse.
- 3.3.19 Several minor tributaries of Copyhold Gill are present in and around the Site. The whole Site drains into Copyhold Gill, either directly or via one of the smaller tributaries. To the north-east of the Site lies Cuckfield Sewage Treatment works.
- 3.3.20 There are several ponds around the periphery of the Site; particularly notable is the sequence of ponds at Cuckfield Park to the north, which likely has a modulating influence on flows in Copyhold Gill within the vicinity of the Site.
- 3.3.21 The majority of the Site is located within Flood Zone 1, at low risk of flooding from rivers or sea. However, a small area in the north of the Site and along the eastern Site boundary, associated with a minor watercourse, is in Flood Zone 2.
- 3.3.22 The Proposed Development is anticipated to be built out in areas located within Flood Zone 1, with no development proposed within the narrow band of Flood Zone 2, present along Copyhold Gill. Consequently, it was considered that all

forms of flood risk to the Proposed Development can be appropriately mitigated and, therefore, the effects would not be considered significant.

- 3.3.23 An outline Drainage Strategy has been provided as part of the planning application, to demonstrate how surface water discharge from the Site will be managed appropriately. Surface water runoff from the Proposed Development will be restricted to the greenfield runoff rate and the required attenuation volume will be provided via Sustainable Drainage Systems (SuDS). It is, therefore, unlikely that there would be any significant effects with the surrounding surface water public sewers.
- 3.3.24 Whilst it is the remit of South East Water (and other water companies) to ensure sufficient water supply is provided for new developments, sustainable measures will be adopted to minimise the water demand of the Proposed Development as far as reasonably practicable. Therefore, it is considered that there will be no significant effects associated with water demand as a result of the Proposed Development. Details of water efficiency measures, to reduce water usage, are summarised in **Chapter 5: The Proposed Development and Construction Overview**.
- 3.3.25 It is likely that the Proposed Development will also result in an increase of wastewater flows; however, it is anticipated that any required upgrades to the wastewater network will be discussed with and ultimately be undertaken by South East Water, to increase the capacity of the wastewater network and enable it to accommodate any additional flows from the Proposed Development. Nevertheless, the Proposed Development will incorporate water efficiency measures to reduce as far as reasonably practicable the volume of wastewater discharged to the wastewater network. Therefore, it is anticipated that the Proposed Development will not result in a significant effect on the wastewater / foul sewer network. Details of water efficiency measures are summarised in **Chapter 5: The Proposed Development and Construction Overview**.
- 3.3.26 The majority of the Parkland Reserve Site is also located within Flood Zone 1, at low risk of flooding from rivers or sea, given its elevated landform. However, a small area in the south of the Parkland Reserve Site, associated with a minor watercourse, is situated in Flood Zone 2.
- 3.3.27 The works to the Parkland Reserve Site are minimal including the change of use of farmland and woodland to parkland reserve to include public access, including establishment of pedestrian and cycle tracks, with new pedestrian and cycle access points, include the addition of two wooden viewing platforms and the instigation of long-term management and rewilding regime. Therefore, the proposed works will not generate any additional forms of flood risk than currently existing or pressure on water resources or drainage; as such, it was

considered that there would be no likely significant effects associated with surface water runoff, water demand or wastewater generation.

- 3.3.28 Given the above, water resources, drainage and flood risk is not considered further within the EIA or reported on in this ES.

Ground Conditions, Minerals and Contamination

- 3.3.29 A Phase 1 Land Quality Desk Study was undertaken for the Site in April 2023. The majority of the Site is underlain by the Upper Tunbridge Wells Sand. The Lower Grinstead Clay, Cuckfield Stone Bed, Upper Grinstead Clay and Ardingly Sandstone Member also outcrop in both the north and south of the Site. In the south of the Site, small outcrops of the Lower Tunbridge Wells Sand and Wadhurst Clay Formation are also present. There is a small outcrop of superficial Head Deposits in the north-west of the Site, otherwise, no superficial deposits are mapped. The Site has remained undeveloped agricultural land and afforested areas throughout its history. Parts of the Site fall within a West Sussex County Council's (WSCC's) minerals safeguarding area for building stone resources, which comprises the Ardingly Sandstone Member and Cuckfield Stone Bed.
- 3.3.30 The Site has undergone limited development since the earliest OS maps and has remained agricultural. Small parts of the Site and the surrounding area have historically been subject to the small-scale extraction of building stone from the Ardingly Sandstone Member and Cuckfield Stone Bed. There are 6 recorded historical quarries across the Site, which may have been infilled by unknown materials; however, many remain as, possibly partial, depressions. One recorded landfill site is present in the north-western corner of the Site and a further landfill site is located approximately 25 m to the south of the Site, which may be associated with historic quarries. The landfill located on the Site is associated with the Cuckfield bypass (A272) and, as such, may not be located on the Site itself. In addition, the sewage treatment works located adjacent to the northern boundary of the Site is likely to be locally impacting surface and groundwater quality, albeit the discharge will be covered by an Environmental Permit. Based on this, potential sources of contamination to the Site include: potential materials infilling quarries; historic landfill sites; herbicides and pesticides from current agricultural use; and diffuse pollution from the sewage treatment works.
- 3.3.31 On the basis of the above and a preliminary risk assessment, it was considered that there is potential for moderate / low risks to human health and the wider environment. However, it is important to note that many of the sources of contamination are historical and also discrete / isolated within the vast majority of the Site, and likely to result in a low potential risk to future users and the wider environment. To mitigate the potential for any significant effects, a

suitable scoped and targeted Site investigation should be undertaken to understand the ground, groundwater and ground gas regime across the Site and to test the preliminary risk assessment. This is expected to be secured by way of a suitably worded planning condition (where required) and is outlined in **Chapter 15: Residual Effects and Conclusions** of this ES.

- 3.3.32 Whilst a Phase 1 Land Quality Desk Study has not been undertaken for the Parkland Reserve Site, given that the Parkland Reserve Site is located directly to the north-west of the Site, it is considered that the Parkland Reserve Site is underlain by a similar geology to that of the Site.
- 3.3.33 The potential sources of contamination to the Parkland Reserve Site are likely to be similar to that of the Site; however, since the proposed works on the Parkland Reserve Site are minimal and non-intrusive (as outlined in **Chapter 5: The Proposed Development and Construction Overview**), it was considered that there would be no risks to human health and the wider environment.
- 3.3.34 In view of the above, it was anticipated that the Proposed Development and Parkland Reserve Site would not give rise to significant ground conditions, minerals and contamination risks or effects. Consequently, this topic is not considered further within the EIA or reported on in this ES.

Human Health

- 3.3.35 Health is influenced by many factors (i.e. determinants of health), including (but not limited to) physical activity; diet and nutrition; housing; open space; leisure and play space; transport modes, access and connections; social participation, interaction and support; education and training; employment and income; climate change and adaptation; air quality; noise and vibration; land quality; and health and social care services.
- 3.3.36 Those that were considered likely to experience change in health as a result of the Proposed Development and the Parkland Reserve Site (i.e. sensitive receptors) included the general population, such as future residents, future users of the Site and Parkland Reserve Site, construction workers and operational / maintenance workers. Whilst IEMA's Guide to Determining Significance for Human Health in Environmental Impact Assessment¹² highlights that there could be a range of sensitivities within sub-populations, with some who are more vulnerable and less able to deal with changes (for example, being more sensitive than others), it was considered that the population and sub-populations anticipated to be affected by the Proposed Development and Parkland Reserve Site are unlikely to have an increased

¹² IEMA. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

sensitivity to health impacts. Consequently, a low sensitivity of receptor was assumed.

- 3.3.37 Further to the above, it was considered that the Proposed Development and Parkland Reserve Site will have a low magnitude of impact on elements such as (but not limited to) risk taking behaviour, air quality, water quality or availability and land quality, as the implementation of a CEMP would reduce risk taking behaviour and potential adverse effects on air quality, water quality and land quality during the construction of the Proposed Development.
- 3.3.38 However, it was considered that the Proposed Development will also have a medium magnitude of impact on elements such as (but not limited to) physical activity levels, housing need, open space and play space, transport modes and connections, community safety and noise, as the Proposed Development will promote physical activity through the provision of open space and encouragement to use sustainable modes of transport, provide a dwelling mix relative to the community need and provide affordable housing, be designed to minimise actual fear and crime, and be designed in accordance with the relevant noise standards set by policy. The Parkland Reserve Site was considered to have a low magnitude of impact on elements such as physical activity levels and open space, as the Parkland Reserve Site will promote physical activity through the provision of open space.
- 3.3.39 Given the above, in line with the generic indicative EIA significance matrix presented in IEMA's Guide to Determining Significance for Human Health in Environmental Impact Assessment¹³, it was considered that the Proposed Development and Parkland Reserve Site would not result in any likely significant effects. Although beneficial effects would likely be realised as a result of the Proposed Development and Parkland Reserve, these would be considered to be minor and not significant. Therefore, this topic is not considered further within the EIA or reported on in this ES.

Major Accidents and / or Natural Disasters

- 3.3.40 As a residential-led, mixed-use development, the Proposed Development would not be a source of hazard that could result in a major accident or disaster during operation. The same applies to the Parkland Reserve Site, as it is a primarily proposed to instigate a long-term management and rewilding regime. Measures to eliminate the risk of major accidents or disasters as a result of the construction of the Proposed Development will be outlined in a CEMP, anticipated to be set as a suitable worded planning condition.

¹³ Ibid.

- 3.3.41 A review was undertaken of potential sources of hazard in the surrounding area, that have the potential to interact with the Proposed Development and the Parkland Reserve Site.
- 3.3.42 As described above, adverse changes to water resources, drainage and flood risk were considered unlikely to be significant, as were the risks from ground conditions, minerals and contamination.
- 3.3.43 No structural, geomorphological or geochemical features were recorded on or near the Site by British Geological Survey (BGS) mapping and there were no Health and Safety Executive (HSE) Control of Major Accident Hazards (COMAH) sites in close proximity to the Site or Parkland Reserve Site.
- 3.3.44 Any increased risk of major accidents or disasters as a result of climate change has been addressed in **Chapter 12: Climate Change Mitigation and Adaptation** of this ES.
- 3.3.45 It was considered that existing design measures and standard practice will adequately control any potential major accidents and / or disasters and as such, it was considered that there would be no likely significant effects relating to this topic. Consequently, major accidents and / or natural disasters is not considered further within the EIA or reported on in this ES.

Materials and Waste

- 3.3.46 The Proposed Development will give rise to a small amount of removed waste associated with construction waste (from excavation and wastage of construction materials) and operational waste.
- 3.3.47 It is anticipated that the Parkland Reserve Site will generate even less waste than that of the Proposed Development from the wastage of construction materials, given the minimal works proposed on the Parkland Reserve Site (refer to **Chapter 5: The Proposed Development and Construction Overview** for further details).
- 3.3.48 Details of measures embedded within the design of the Proposed Development to reduce the use of materials and creation of waste have been submitted as part of the planning application.
- 3.3.49 In accordance with the principles of the Waste Management Plan for England (2013) and the National Planning Policy for Waste (2014), a principal aim during construction will be to reduce the amount of waste which is generated and exported from the Site. This will include measures such as 'just in time deliveries', the secure storage of materials and prevention of stockpiling to minimise the potential for waste. This approach complies with managing waste towards the higher end of the Waste Hierarchy, where the intention is first to prevent, reuse, recycle and as a last resort, to dispose of waste off-site as

necessary. All relevant construction contractors will be required to investigate opportunities to minimise and reduce waste generation in line with WRAP's 'Halving Waste to Landfill' initiative.

- 3.3.50 It is anticipated that the material that will be excavated from the Site will not be contaminated due to the Site's previous use. Where inert and non-hazardous material is identified, in line with the proximity principle, it is anticipated that this waste will be managed and re-used where possible. In addition, contractors will seek to manage the waste towards the higher end of the Waste Hierarchy where appropriate, in order to minimise waste being sent to landfill.
- 3.3.51 The requirement for Site Waste Management Plans was revoked on 1st December 2013, however, it is considered best practice to produce a Construction Resource Management Plan (CRMP). The CRMP outlines the ways in which the Waste Hierarchy will be adhered to and waste will be managed during excavation and construction of the Proposed Development in order to avoid environmental impacts. The CRMP will be prepared during the post planning phase, once the necessary details concerning excavation and construction are known (such as the detailed construction programme, details of appointed contractors and details of proposed construction methods). **Chapter 5: The Proposed Development and Construction Overview** outlines construction waste quantities associated with the Proposed Development.
- 3.3.52 Operational waste will predominantly be from residents and users of the schools and local centres. The Proposed Development will include provisions for waste storage facilities, which will allow for the separation of waste for recycling purposes. An Operational Waste Management Strategy will be developed for the Site during the Reserved Matters application (RMA) stage, which will set out the principles, strategy and targets for the management of waste and maximisation of recycling, in accordance with MSDC established policy.
- 3.3.53 With the mitigation measures outlined above, the Proposed Development and Parkland Reserve Site were not anticipated to substantially reduce landfill capacity in the region. IEMA guidance identifies a landfill diversion rate of 60% as a threshold for impacts of a minor magnitude. It was, therefore, unlikely that significant effects due to construction or operational waste from the Proposed Development and Parkland Reserve Site would be identified.
- 3.3.54 With regards to materials, there was not anticipated to be any significant issues in terms of availability of materials required for the Proposed Development and Parkland Reserve Site. The Proposed Development will comprise a high number of sustainable features and construction methods, with the Parkland Reserve Site implementing 'soft touch' management systems. There were, therefore, not

anticipated to be any significant effects on materials from the Proposed Development and Parkland Reserve Site.

- 3.3.55 As there were not anticipated to be any significant effects in terms of availability of materials or the production of construction or operational wastes, it was considered that materials and waste could be scoped out of the EIA. Therefore, this topic is not considered further within the EIA or reported on in this ES.

Public Consultation

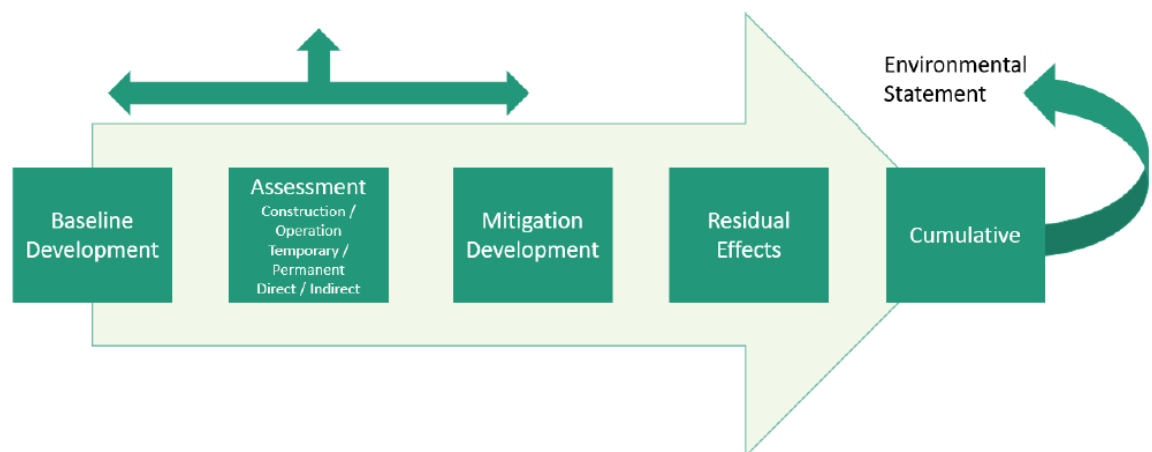
- 3.3.56 Engagement with non-statutory consultees is an on-going process as part of the design development. The process of consultation and engagement is also critical to the preparation of a comprehensive and balanced scheme, to help focus the environmental studies and to identify specific issues that require further investigation, and to understand the views of the local community. Information and views have been sought through public consultation.
- 3.3.57 Consultation and engagement events / activities included:
- A Design Review Panel, held with Design South East on 16th August 2023;
 - Public consultation held in the form of an online website, which was available between 11th September to 9th October 2023;
 - Two in-person public consultation events, held on 20th September 2023 and 23rd September 2023 at the Ansty Sports and Social Club, Deaks Lane, Ansty.
- 3.3.58 In addition to the above, a series of email correspondence and meeting were held between the project's Transport Consultant and WSCC regarding the proposed highways strategy and design between November 2022 and August 2023. WSCC were also consulted regarding the education provision to be delivered as part of the Proposed Development.
- 3.3.59 MSDC were consulted via a pre-application meeting held on 10th October 2023, to present the Proposed Development, explaining the opportunities and constraints, design evolution and rationale, parameter plans, illustrative masterplan, and design intent of the landscape, street hierarchy, built form and identity.
- 3.3.60 Further details of the public consultation events are provided within the Statement of Community Involvement, submitted as part of the planning application.

3.4 Assessment Approach

Approach to Technical Studies

3.4.1 The approach taken to the EIA process is shown in **Figure 3.1**. The general approach to the assessment establishes the baseline for each topic. Receptors and resources are identified, and their sensitivity classified. The potential impacts of the Proposed Development and Parkland Reserve Site on these receptors and resources are assessed for the construction and operational phases of the Proposed Development and Parkland Reserve Site where relevant, taking into account any embedded mitigation. Subsequently, additional mitigation measures are considered, as appropriate, allowing the likely significant residual and cumulative effects to be identified.

Figure 3.1: EIA Assessment Process



3.4.2 In order to inform the design process, the EIA studies commenced at an early stage in the development and design process of the Proposed Development and Parkland Reserve Site in 2023. The studies have been undertaken in accordance with current best practice. Specific guidance used is referenced within each of the respective technical chapters.

3.4.3 The assessments involved consultation with statutory and non-statutory bodies (where applicable, for example, with the Sussex Biodiversity Record Centre (SxBRC)), desk-based research, Site / Parkland Reserve Site inspections and surveys, impact and effect prediction and identification of mitigation measures.

3.4.4 The assessment and conclusions of the ES are based on the Proposed Development and Parkland Reserve Site, as described in **Chapter 5: The Proposed Development and Construction Overview**.

Baseline Development

- 3.4.5 The ES primarily describes environmental impacts in terms of the extent of likely change to the baseline environment. The baseline represents the environmental conditions of the Site at the time of the assessment.
- 3.4.6 For most of the technical ES chapters, this means the baseline has been taken as the existing conditions (2022-2023 – when the majority of the baseline surveys were undertaken) at the Site. However, in some circumstances (such as for climate change) it may be necessary to apply a ‘future baseline’ or a more historic one when based on population survey data. Where this has been undertaken, this has been explained and justified within the relevant technical ES chapters.

Spatial Scope

- 3.4.7 The redline boundary of the Site and Parkland Reserve Site are shown at the end of this chapter in **Figure 3.3**. Assessment study areas will vary by topic areas, according to the baseline information and the nature of likely impacts. These have been determined and outlined within each technical chapter within this ES.
- 3.4.8 The scale and layout of the outline components have been presented as scale and layout parameters. There are a number of technical aspects of the EIA where scale and layout are of particular relevance for the purposes of the assessment of environmental impacts. These are as follows: Socio Economics; Traffic and Transport; Air Quality; Noise and Vibration; and Landscape and Visual Impact.
- 3.4.9 Where appropriate, the EIA has tested the maximum extent of the developable area, so as to ensure that the worst-case environmental impacts sought for both outline approvals have been assessed by the EIA.
- 3.4.10 An illustrative masterplan has been formed based on the maximum parameters to illustrate one way in which the Proposed Development and Parkland Reserve Site could be delivered, and this has been assessed, where appropriate.
- 3.4.11 In terms of the amount of development, the planning application for the Proposed Development states a maximum Gross External Area (GEA) upper limit in respect of residential units and non-residential uses.

Temporal Scope

- 3.4.12 The ES assesses the environmental impacts of the Proposed Development and the Parkland Reserve Site during both construction and operation. The assessment compares the current and future baseline conditions (as

appropriate) to those conditions expected with the construction and operation of the Proposed Development and Parkland Reserve Site. The assessment assumes that construction starts in Q3, 2025 and ends in Q1, 2032, subject to securing planning permission and RMA consent.

3.4.13 The assessment considers the totality of the Proposed Development and the Parkland Reserve Site from construction through to operation, using the following assessment scenarios, where relevant:

- existing baseline;
- future baseline (without Proposed Development and Parkland Reserve Site);
- assessment of peak construction effects; and
- assessment of operational effects (all construction completed, the Proposed Development fully occupied and operational, and the Parkland Reserve Site operational).

3.4.14 The point at which peak construction effects are anticipated varies between assessment topics. For those assessments driven by the effects of transport, peak construction traffic is likely to lead to peak effects. For assessment topics where effects are driven by massing, effects are likely to increase over the duration of the construction period. The peak construction effects are stated within each topic chapter of this ES.

3.4.15 The assessment does not consider the demolition of the Proposed Development as it has been assumed that it will have a design life of at least 60 years and no demolition is expected within the Parkland Reserve Site.

Structure of Technical Chapters

3.4.16 Each technical chapter of the ES (**Chapters 6 to 13** and **Volume 3**) has been set out broadly in line with structure outlined in **Table 3.2**.

Table 3.2: Structure of the Technical Chapters

Technical Chapter Structure	
Scope of Assessment	Each of the technical chapters begins with an introduction to the assessment, explaining its purpose in the context of the Proposed Development, the Parkland Reserve Site and the ES, including any key topics / aspects which have been scoped in or out of the assessment.
Key Legislation, Policy and Guidance Considerations	This section includes a summary of national, regional and local policies of relevance to the environmental discipline and assessment. Where applicable, relevant legislation has also been summarised.
Assessment Methodology	This section provides an explanation of methods used in undertaking the study with reference to published

Technical Chapter Structure	
	standards, guidelines and best practice. Limitations or difficulties encountered are discussed, where relevant. This section also discusses the application of sensitivity, magnitude and significance criteria within the assessments.
Baseline Assessment and Identification of Key Receptors	This section describes and evaluates the baseline environmental conditions i.e. the current situation and anticipated changes over time in the absence of the Proposed Development and the Parkland Reserve Site. This is a critical part of the EIA process as it provides a measure against which the likely significant effects on the environment can be assessed.
Identification and Description of Changes Likely to Generate Effects	This section provides a brief description of the changes likely to generate effects during both the construction of the Proposed Development and Parkland Reserve Site, and / or the operation of the Proposed Development and the Parkland Reserve Site.
Assessment of Likely Significant Effect	This section identifies the likely significant effects on the environment resulting from the Proposed Development and the Parkland Reserve Site during construction and operational phases taking into account the embedded mitigation outlined within each of the topic chapters 6 to 13 and Volume 3. A description of the likely effects of the Proposed Development and the Parkland Reserve Site, and an assessment of their predicted significance are also provided.
Scope of Additional Mitigation Measures	One of the main aims of the EIA process is to develop suitable mitigation measures to avoid, reduce or compensate for all significant adverse effects of a project. These measures relate to all phases. This section describes the additional measures which would be implemented to mitigate against potentially significant adverse effects. Where possible, enhancement measures have been proposed.
Residual Effects	The residual effects, i.e. the remaining effects of the Proposed Development and the Parkland Reserve Site assuming implementation of the proposed embedded and additional mitigation measures, have been estimated and presented.
Cumulative Effects	This section summarises the cumulative effects of the Proposed Development and the Parkland Reserve Site in combination with identified schemes.

3.4.17 The Landscape and Visual Impact Assessment (LVIA) follows the same structure as the technical chapters listed above but is provided as a separate volume (**Volume 3**).

Assessment of Effects

- 3.4.18 The assessment of significance of effects has been undertaken using appropriate national and international quality standards. Where no such standards exist, the judgements that underpin the attribution of significance have been described. The guidelines, methods and techniques used in the process of determining significance of effects are contained within each of the topic chapters presented.
- 3.4.19 The ES considers the following periods to support the assessment of likely significant effects:
- Existing baseline (2022-2023);
 - Construction phase (2025 – 2032); and
 - Operational phase (2032).
- 3.4.20 The ES identifies the likely significant effects of construction of the Proposed Development against the 2022-2023 baseline.
- 3.4.21 The assessment of operational effects is undertaken against the future baseline in 2032 (the ‘without development’ / ‘do nothing’ scenario, see **Chapter 4: Alternatives Considered and Design Evolution**), unless otherwise stated in the individual topic chapters.
- 3.4.22 Certain topics have undertaken an assessment of peak construction effects to ensure a reasonable worst-case scenario is considered and that any conclusions are sufficiently robust to accommodate potential changes in the construction methodology. Where a worst-case scenario has been assessed, this has been set out in the assumptions and limitations section of the topic chapters (**Chapters 6 to 13 and Volume 3**).
- 3.4.23 Construction traffic is anticipated to access the Site via the A272. **Chapter 5: The Proposed Development and Construction Overview** provides further detail on the proposed construction methodology and outlines the key construction activities that are likely to generate environmental effects.

Defining Significance

- 3.4.24 The changes generated by a development project may result in outcomes which are considered to be positive or adverse, and in some cases may be considered to be neutral. Examples would include: new scheme-related noise or air pollution, changes in lighting levels, loss of habitat or topsoil, new planting and habitat re-provision, changes to the townscape, loss of surface permeability, waste production, etc.
- 3.4.25 Examples of receptors / resources that might be affected by such changes include: people (residents, passers-by, workers etc.), designated sites (Sites of

Specific Scientific Interest, Conservation Areas, groundwater protection zones etc.) and non-designated environmental resources of value.

- 3.4.26 Effects come about as the result of imposing changes on receptor / resources. The physical extent of effects (in terms of the geographical area affected, or the size of the human population affected, or the spatial extent of any protected species or habitats affected) should all be taken into account when assessing the importance of likely changes along with duration, frequency and reversibility.
- 3.4.27 Step 1 of the process of assessing the significance of an effect (i.e. the imposition of a change onto a receptor / resource) is to identify all relevant combinations of change and receptor / resource which may arise as a consequence of implementing the Proposed Development and the Parkland Reserve Site. This is most easily and clearly done by dividing the assessment by topic area and then further sub-dividing within topic areas the source and type of change (distinguishing between direct, indirect and secondary) and the receptor(s) affected by this.
- 3.4.28 Step 2 is to use professional judgement and / or appropriate best practice guidance (and taking into account specific statutory or non-statutory values and objectives as may be applicable, for example, in relation to air quality or water quality threshold values) to identify:
- The sensitivity of the receptors / resources concerned;
 - The strength (and the geographical scale at which the change is identified), duration and frequency of the likely changes; and
 - To score these components of the effect under consideration.
- 3.4.29 The duration of an effect can be assessed to be:
- Temporary (e.g. construction phase); and
 - Permanent (e.g. once the Proposed Development and the Parkland Reserve Site are completed and operational).
- 3.4.30 Where appropriate and greater precision is helpful, the following terms can also be used:
- short term (<5 years);
 - medium term (5-10 years); and
 - long term (>10 years).
- 3.4.31 Some changes will affect different receptors / resources to different degrees, and some receptors / resources may be affected by a range of potential changes (to which they may well exhibit different sensitivities). Significance

must, therefore, be judged in the context of a specific combination of change and receptor / resource sensitivity.

- 3.4.32 Generic criteria for determining the value / sensitivity of a receptor or resource based on its relative importance and its ability to accommodate change and / or recover from impacts is provided in **Table 3.3**.

Table 3.3: Criteria for Determining Value / Sensitivity

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

- 3.4.33 Generic criteria for determining the magnitude of an impact based on the strength of change, the geographical scale at which it is identified, the duration, frequency and reversibility of the change is provided in **Table 3.4**.

Table 3.4: Criteria for Determining Magnitude of Impact

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

- 3.4.34 Step 3 of the process of assessing the significance of an effect is to describe and document the outcome of Steps 1 and 2, and to judge the significance of each potential effect determined by the interaction of value / sensitivity and magnitude, whereby the effects can be beneficial, adverse or neutral.

- 3.4.35 A generic Effect Significance Matrix is set out in **Table 3.5** to assist in this judgement of significance, whereby it is generally considered that any effect greater than “minor” is considered a significant effect.

Table 3.5: Effect Significance Matrix

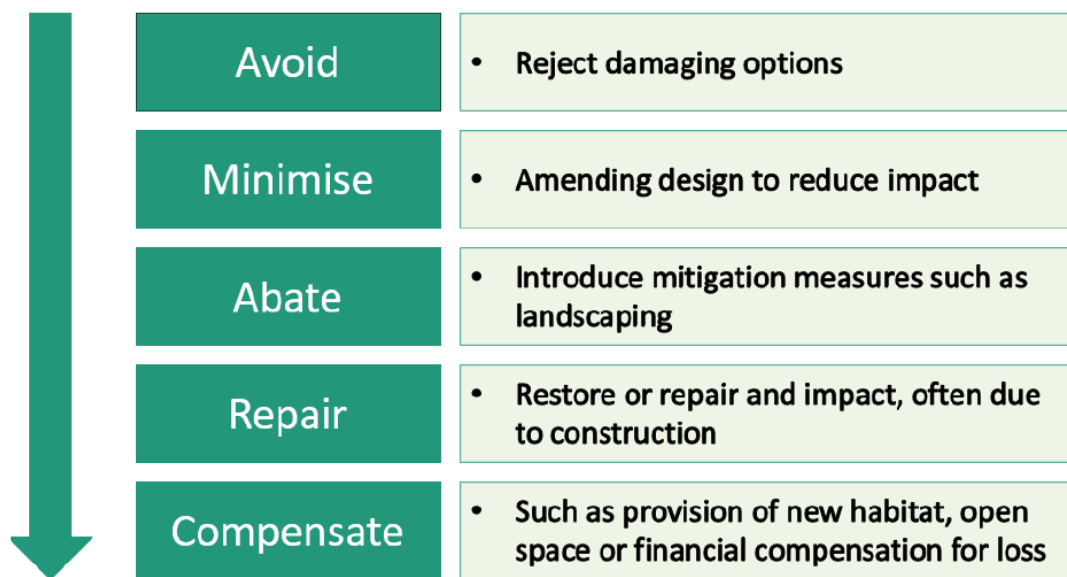
Magnitude of impact	Sensitivity		
	High	Moderate	Low
Major	Major Adverse / Beneficial	Major – Moderate Adverse / Beneficial	Moderate – Minor Adverse / Beneficial
Moderate	Major – Moderate Adverse / Beneficial	Moderate – Minor Adverse / Beneficial	Moderate – Minor Adverse / Beneficial
Minor	Moderate –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

- 3.4.36 In all cases, the author should exercise professional judgement and take account of all relevant topic specific standards, guidance and threshold in assessing the significance of an effect.
- 3.4.37 Step 4 is to record those effects which are to be treated as significant, and to identify those effects which, while not in the end deemed to be significant, may well need to be considered further in the context of cumulative effects.
- 3.4.38 The matrix presented above in **Table 3.5** is widely accepted and used within the EIA industry. The magnitude and significance criteria have been provided as a guide for technical specialists to assess effect significance.
- 3.4.39 Where discipline specific methodology has been applied that differs from the generic criteria above, this has been clearly explained within the given chapter under the heading of Assessment Methodology and Significance Criteria.

Mitigation Measures

- 3.4.40 Any potentially significant adverse effects have been considered for mitigation at the design stage and, where practicable, specific measures have been put forward. Measures have been considered based on the hierarchy of mitigation set out in **Figure 3.2**.

Figure 3.2: Mitigation Hierarchy



- 3.4.41 Where the effectiveness of the mitigation proposed has been considered uncertain, or where it depends upon assumptions of operating procedures, data and / or professional judgement has been introduced to support these assumptions.
- 3.4.42 Mitigation to be implemented during the construction and operational phases will be secured through planning conditions and obligations.
- 3.4.43 Two main types of potential mitigation measures have been assessed:
- **Embedded Mitigation** – embedded mitigation includes design/standard control measures, which have been taken into account in an initial assessment of the effects. The Proposed Development and Parkland Reserve Site have been developed in such a way that the reduction and, wherever possible, elimination of any associated significant adverse environmental effects is integral to the overall design philosophy. The embedded mitigation measures will be captured and implemented through the design of the Proposed Development and Parkland Reserve Site or provisions of a CEMP and are also presented within the technical chapters (**Chapters 6 to 13 and Volume 3**).
 - **Additional Mitigation** – further additional mitigation measures may be introduced, where appropriate, and are taken into account in the assessment of residual effects. Where it has not been possible to avoid adverse significant environmental effects, such additional mitigation and monitoring measures are discussed as applicable in the relevant technical chapter.

Residual Effects

- 3.4.44 The likely residual effects on the environment, assuming the successful implementation of the mitigation measures proposed, are identified within each assessment.
- 3.4.45 The residual effects will be assessed using the same system as described above taking account of any assessment mitigation proposals. Generally, based on the described classification and professional judgement, effects considered to be moderate or major will be deemed significant, and those considered minor, or negligible, will be deemed not significant.

Cumulative Effects

- 3.4.46 The EIA Regulations specify that the description of the likely significant effects within an ES should include *“the direct effects and any indirect, secondary, cumulative...effects”*.
- 3.4.47 There are two types of cumulative effects: Type 1, intra-project effects which are the combined effects of individual topic impacts on a particular sensitive receptor, and Type 2, inter-project effects which are the combined effects of several development schemes (in conjunction with the Proposed Development and the Parkland Reserve Site) which may, on an individual basis be insignificant but, cumulatively, have a significant effect.
- 3.4.48 The ES has given consideration to cumulative effects for schemes located within an approximate 5 km radius from the boundary of the Site and Parkland Reserve Site. Using professional judgement, it is considered that this spatial extent represents a suitable area over which any potential cumulative effects may occur. Any variations from this 5 km radius boundary within individual topic assessments are set out in the respective technical chapters. The cumulative schemes considered include:
- approved but uncompleted schemes (i.e. unimplemented or under construction); and
 - schemes for which a planning application has been submitted and which is under consideration by the consenting authorities;
 - schemes for which a request for an EIA Scoping Opinion has been submitted; and
 - for certain topics (e.g. visual impact), it may have been appropriate to include developments outside of this area of search, should those project's individual characteristics warrant it (e.g. a particularly tall building).
- 3.4.49 The EIA Regulations only require consideration of other existing and or approved schemes; however, in order for the list to remain up to date at the

time of submission, submitted applications up to two years prior to the submission of the planning applications have been considered.

3.4.50 **Table 3.6** sets out the consented and committed schemes for consideration in the cumulative effects assessments, some of which are now known to be operational and therefore form part of the existing baseline. These are also shown spatially on **Figure 3.4** at the end of this chapter.

Table 3.6: Schemes for Consideration in the Cumulative Effects Assessment

Ref. No. for Map	Development	Planning Application Reference	Summary of Development	Approx. Distance from Site (km)	Planning Status
1	The Martlets Shopping Centre, Burgess Hill, West Sussex, RH15 9NN	DM/19/3331	Demolition of multi-storey car park, public library and offices. The conversion of existing buildings and erection of new buildings to provide, additional retail floor space (Classes A1 and A3), residential units (Class C3) with undercroft car parking, a multi-screen cinema (Class D2), bowling alley (Class D2), gymnasium (Class D2), a hotel (Class C1), the reconfiguration and expansion of existing public car park, amendments to the site access, public realm improvements including landscaping, and other associated works (revision of DM/15/3858 and DM/18/1580).	3.8	Planning permission granted 02.07.2021.
2	Land At And Adjacent To The Former Sewage Treatment Works, Fairbridge Way, Burgess Hill, West Sussex, RH15 8BF	DM/19/1895	Outline application for the development of the former sewage treatment works to provide up to 325 dwellings (Use class C3) with associated access, landscaping and associated infrastructure.	2.3	Planning permission granted 29.06.2021.
3	Land East Of Keymer Road, Burgess Hill, West Sussex	DM/22/1837	Screening Request for the Proposed Construction of a Residential Development of approximately 300 dwellings and associated infrastructure.	5	Screening Opinion issued 29.06.2022.

Ref. No. for Map	Development	Planning Application Reference	Summary of Development	Approx. Distance from Site (km)	Planning Status
4	Hurst Farm, Hurstwood Lane, Haywards Heath, West Sussex, RH17 7QX	DM/22/2272	Outline application with all matters reserved except for access for the erection of up-to 375 new homes, a two-form entry primary school, burial ground, allotments, open space with associated infrastructure, landscaping and parking areas. 'Amended land use, building heights parameters and access plans, and additional information regarding drainage, agricultural land classification, highways matters and burial ground and water quality received 20th February 2023.'	3.35	Planning application validated 19.07.2022. Pending consideration.
5	Land To The West Of Freeks Lane, Burgess Hill, West Sussex, RH15 8DQ	DM/18/0509	Residential development comprising up to 460 dwellings, public open space, recreation areas, play areas, associated infrastructure including roads, surface water attenuation and associated demolition (outline application with all matters reserved except for principal means of access from Maple drive.	2.3	Planning permission granted 24.07.2019.
6	Burgess Hill Northern Arc, Cuckfield Road, Burgess Hill, West Sussex	DM/18/5114	Comprehensive, phased, mixed-use development comprising approximately 3,040 dwellings including 60 units of extra care accommodation (Use Class C3) and 13 permanent gypsy and traveller pitches, including a Centre for Community Sport with ancillary facilities (Use Class D2), three local centres (comprising Use Classes A1-A5 and B1, and stand-alone community facilities within Use Class D1), healthcare facilities (Use Class D1), and employment development comprising a 4 hectare dedicated business park (Use Classes B1 and B2), two primary school campuses and a secondary	1.5	Planning permission granted 04.03.2019.

Ref. No. for Map	Development	Planning Application Reference	Summary of Development	Approx. Distance from Site (km)	Planning Status
			school campus (Use Class D1), public open space, recreation areas, play areas, associated infrastructure including pedestrian and cycle routes, means of access, roads, car parking, bridges, landscaping, surface water attenuation, recycling centre and waste collection infrastructure with associated demolition of existing buildings and structures, earthworks, temporary and permanent utility infrastructure and associated works.		

Allocated Sites

3.4.51 It is noted that there are a number of sites that have been allocated in the emerging Local Plan, relating to housing land supply, within a 5 km radius of the Site. However, where the sites have been allocated for less than 150 dwellings, these have not been taken into consideration within the cumulative effects assessment, as they are not considered to be significant development schemes and, therefore, able to give rise to cumulative effects.

3.4.52 The potential allocated sites which could be considered within the cumulative effects assessment include the below. However, they have not been considered within the cumulative effects assessment as the EIA Regulations require that a cumulative assessment be based on ‘other existing and approved projects’ (i.e. committed developments – those with permission or with resolutions to grant) at the point of determination.

- DPH18: Land at Foxhole Farm, Bolney – draft allocation for 200 dwellings; and
- DPH22: Land at LVS Hassocks, London Road, Sayers Common – draft allocation for 200 dwellings.

‘Significant’ Sites

3.4.53 In terms of ‘significant’ sites allocated for housing within the emerging Local Plan, those within 5 km of the Site include DPSC1: Land to the West of Burgess Hill (located approximately 2.92 km from the site, for approximately 1,400 dwellings on 67.7 ha of land). This will have been included within the WSCC’s

strategic traffic model, which has formed the basis of the traffic data that has been taken into consideration for the traffic and transport, air quality and noise and vibration assessments. Consequently, the 'significant' site has been inherently considered within the traffic and transport, air quality and noise and vibration cumulative effects assessments.

- 3.4.54 With regards to the socio-economics, agriculture and soils, ecology and climate change mitigation and adaptation cumulative effects assessments, the 'significant' site noted above has not been taken into account, as the EIA Regulations require that a cumulative effects assessment be based on 'other existing and approved projects' (i.e. committed developments – those with permission of with resolutions to grant). Committed developments are included in cumulative effects assessment to allow a level of meaningful assessment in the various different topics. This is to enable the outputs of the cumulative effects assessments to be reasonable representations of the future scenario, therefore understanding the potential for significant cumulative effects, and allowing appropriate mitigation to be considered.
- 3.4.55 If the 'significant' site was included as part of the cumulative effects assessments, it would result in significant cumulative effects for most of the topic chapters of this ES, as it would likely generate significant effects in isolation. This would, therefore, negate the ability to undertake a meaningful and realistic cumulative assessment.
- 3.4.56 Given the above, the 'significant' site allocated for housing within the emerging Local Plan, located within 5 km of the Site, has not been taken into consideration within the cumulative effects assessment for socio-economics, agriculture and soils, ecology and climate change mitigation and adaptation.

Interactive effects

- 3.4.57 Interactive effects are also considered in the ES. Interactive effects arise where a receptor experiences multiple effects of the Proposed Development and the Parkland Reserve Site (often across different environmental topics), and where the effect of one topic alters the experience of the effect of another topic. Common examples of these include:
- the combined nuisance effect of increased traffic, noise and air pollution, and adverse visual impacts during construction;
 - changes to ground conditions and water levels and the resultant impact on archaeological remains; and
 - increased demand on open space exacerbated by effects that would worsen the experience of using current amenity spaces.

3.5 Assumptions and Limitations

3.5.1 The principal assumptions that have been made and any limitations that have been identified in preparing the ES are set out in each technical chapter.

General assumptions include the following:

- assessments primarily assume the baseline conditions in 2022-2023 when the majority of the baseline surveys were undertaken;
- current surrounding land uses do not change, with the exception of the cumulative developments identified;
- assessments are based on published sources of information and primary data collection. Sources are provided as necessary;
- assessments are based on the description of the Proposed Development and Parkland Reserve Site and the anticipated construction methodology and programme summarised in **Chapter 5: The Proposed Development and Construction Overview**;
- the design, construction and operational phases of the Proposed Development and the Parkland Reserve Site will satisfy minimum environmental standards, consistent with contemporary legislation, practice and knowledge;
- planning permissions, when granted, will contain conditions that will control disturbance during construction and operation, and be sufficient to limit the development to that which has been assessed in the EIA;
- any future development of the Site and the Parkland Reserve Site, beyond the Proposed Development and the Parkland Reserve Site to which this ES relates, will be determined through separate planning applications and is not assessed within this ES;
- the construction information on which the assessments are derived, are based on the best information available at the time of writing and represent a reasonable scenario of how the Proposed Development and the Parkland Reserve Site may be implemented; and
- subsequent to the modelling studies being carried out for some of the technical disciplines, the Proposed Development and the Parkland Reserve Site have incorporated minor design amendments. Where this is the case, the results presented in the ES have been adjusted to best reflect the Proposed Development and the Parkland Reserve Site and this is noted within the limitations and assumptions section of the individual technical chapters.

3.6 Objectivity

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

Figure 3.3: Sites' Location Boundaries

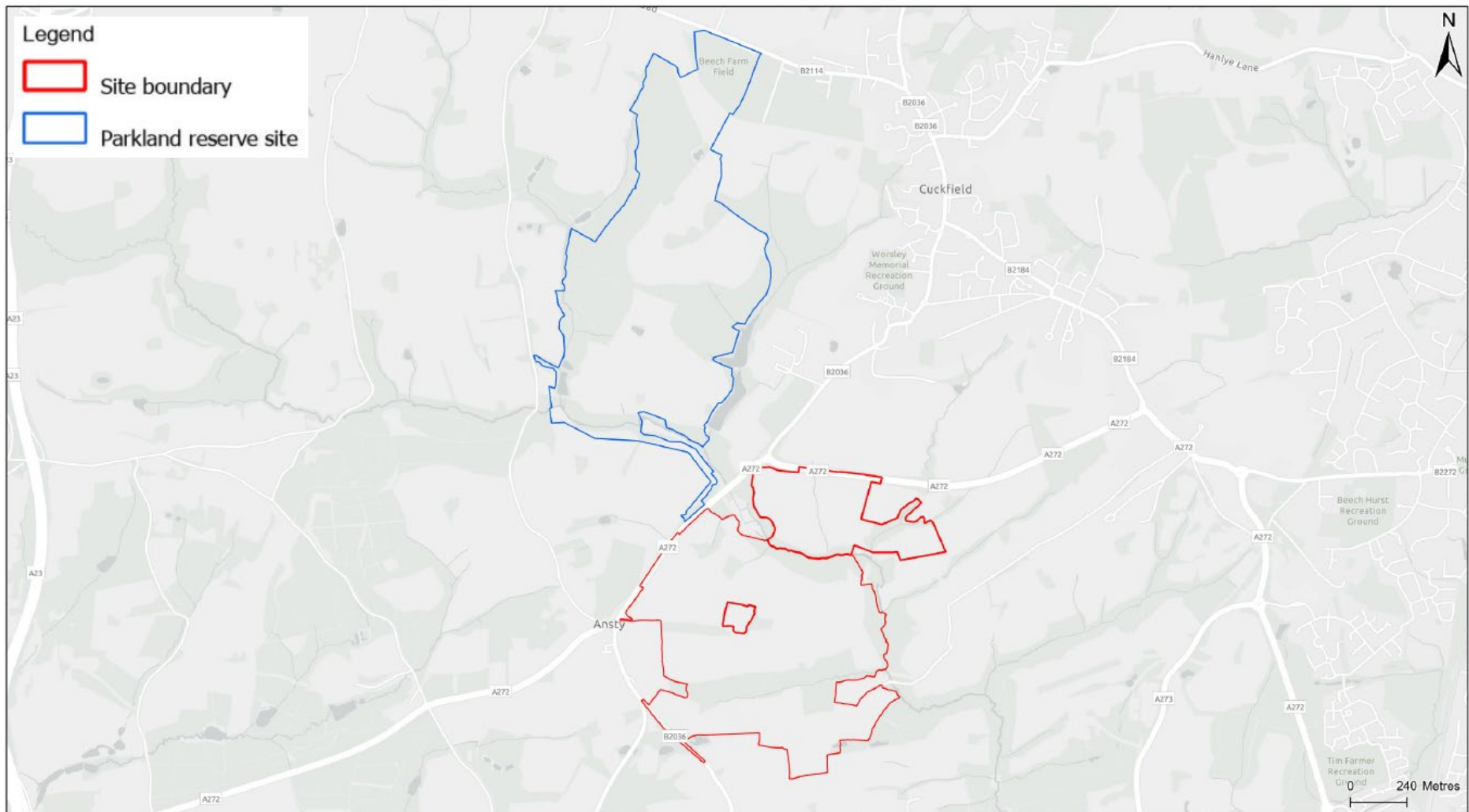


Figure 3.4: Cumulative Schemes

