

4 Environmental Assessment Methodology

4.1 Introduction

4.1.1 This chapter of the Environmental Statement (ES) sets out the approach taken to the Environmental Impact Assessment (EIA) of the project. The chapter also includes details of the consultation undertaken to date and the overall approach to the assessment of the likely effects of the project. Further details of topic specific methodologies, such as survey methods, are provided in each topic chapter of this ES.

4.2 Scoping and Consultation

Scoping

4.2.1 Scoping is the process of identifying the issues to be addressed during the EIA process. Scoping is an important preliminary procedure, which sets the context for the EIA process.

4.2.2 Regulation 15 of the EIA Regulations allows an applicant to request that the local planning authority sets out its opinion (known as a Scoping Opinion) as to the issues to be addressed in the ES. Whilst there is no formal requirement in the EIA Regulations to seek a Scoping Opinion prior to submission of an ES, it is recognised as best practice to do so.

4.2.3 In order to produce an adequate and focused EIA, and in the interests of transparency, a formal request for a Scoping Opinion was submitted to West Sussex County Council in November 2015, in addition to topic specific consultations with the relevant bodies. A Scoping Opinion was provided by the Council on 15th December 2015.

4.2.4 A copy of the Scoping Request and resulting Scoping Opinion are included as Appendices 4.1 and 4.2 respectively. Responses were received from the following organisations:

- A local resident and member of the Britaniacrest Residents Liaison Committee and community representative for Station Cottages, Station Road, Warnham;
- DMH Stallard, on behalf of Liberty Property Trust (the developers of the North Horsham Allocation);
- Environment Agency;
- Gatwick Airport Aerodrome Safeguarding;
- Horsham District Council;
- Langhurstwood Road Residents Group;
- Natural England;
- Warnham Parish Council;
- West Sussex County Council (WSSC) - Strategic Planning - Environment & Heritage;
- WSSC - Strategic Planning – Ecology; and
- WSSC - County Highways.

Additional Consultation and Publicity

- 4.2.5 Consultation with interested parties has been undertaken during the development of the project. This section of the ES summarises consultation undertaken with stakeholders with regard to the EIA process.
- 4.2.6 In addition to the formal scoping consultation detailed above, the project team has undertaken consultation with, or requested information from a number of organisations. Details of the organisations contacted, the comments received and how these have been considered in the ES, are set out in the individual topic chapters.
- 4.2.7 In addition to the formal scoping request to the planning authority and other topic specific consultations noted above and within specific chapters, Britaniacrest Recycling Ltd has undertaken an extensive programme of stakeholder engagement prior to the submission of the application to ensure that stakeholders were fully informed of the proposals and were given the opportunity to input into the design elements and the identification of key issues to be addressed through the EIA process.
- 4.2.8 Full details of this process are provided in the Statement of Community Involvement included at Appendix 4.3 and in summary included:
- A liaison committee was held, and continues to be held between Britaniacrest and the local community called the Community Liaison Group (CLG). The CLG had already been established prior to proposals emerging for the new development. Consequently, it was possible to build on the existence of the liaison group to develop the community liaison on the 3Rs Facility. Britaniacrest commenced communications on the proposed development in January 2016. Communication with the public at large commenced in October 2016 and included two sets of two-day exhibitions. These were accompanied on both occasions by information leaflets, called Britania Bulletin that were posted directly to the nearest residences. Britaniacrest has given consideration to comments received throughout the process, together with various other communications with local residents, businesses, councillors and officers. The prime objective of the pre-application communications programme was to provide the community with necessary information about the proposed development and planning application, and to answer questions and respond to concerns. This community engagement over time shaped the proposed development taking into account the opinion made by residents and the councils overwhelmingly wishing the building height to be as low as possible. This involved significant engineering redesign of the facility and a reduction % in height from the 2016 design has been achieved.
 - Communication with Elected Members: Britaniacrest gave elected members the opportunity to ensure that they were fully briefed on the proposals, the timing of exhibitions and the availability of formation so that Members could respond knowledgeably to residents if asked.
 - Engagement with Resident Community: Stakeholders were identified and made aware of the proposals by:
 - Briefings at the CLG: As described above.
 - Newspaper adverts: To raise the maximum possible awareness of the proposed development it was decided in consultation with the Liaison Group to advertise the public exhibitions in the District Post and the West Sussex County Times. The West Sussex County Times is a paid for paper which has a circulation of around 45,000 weekly readers in West Sussex. <http://www.jplocalbusiness.co.uk/about/?ref=WSC>. For the 2016 exhibition adverts were placed in the District Post on 30th September and in the West Sussex County Times on 6th October. For the 2018 exhibition, adverts were placed in the District Post on 19th January, and in the West Sussex County Times on 18th January and 25th January.
 - Facebook posts: To broaden and diversify the audience reached, Britaniacrest posted an advertisement regarding the forthcoming exhibition on the Britaniacrest Facebook page, which has 179 followers, on September 30th 2016. This received 25 likes and was shared 3 times by

the local community and remained on the top of their Facebook page newsfeed. The Britaniacrest advert post was also shared by the Horsham community Facebook page on the 1st October 2016, which has a greater following of 27,006 people. Horsham contains approximately 21,000 households and has a population of 49,000, making this is a substantial outreach into the local Horsham community.

- A dedicated website page: The Britaniacrest website (<http://www.britaniacrestrecycling.co.uk>) has been in operation for a number of years and has incorporated information about the site since August 2015 titled "Wealden Works", and can be found on: <http://www.britaniacrestrecycling.co.uk/wealden-works-clg>. The website also includes a dedicated page about the proposed development of the application site on: <http://www.britaniacrestrecycling.co.uk/wealden-works-dp> including an advert about the public exhibition, site specific newsletter and graphic panels.
- Newsletter: Britaniacrest produced an A4 newsletter titled 'Britania Bulletin'. The first issue was circulated in early October 2016 to inform people about the 3Rs Facility and invite residents, businesses and all those interested to the public exhibition to find out more. A second Britania Bulletin was produced in January 2018 to update people on how the feedback given at the last exhibition has changed the new proposals and provide summarised information about the final submission and invite readers to attend the public exhibition, which took place over two days in late January 2018.
- A leaflet drop: a leaflet drop of the Britania Bulletin issue 1 newsletter was undertaken to all homes in Langhurstwood Road and Station Road. This distribution took place on the 5th October 2016. Prior to the second exhibition, the area of distribution was increased to include properties in Mercer Road, Bell Road, the east side of Church Street and Wyvern Place, in Warnham. All businesses in Langhurstwood Road also received the Britania Bulletin.
- Mailing List: A mailing list was started in August 2015 to ensure everyone who expresses a wish is kept informed about the site. Initially details pertaining to the Community Liaison Group were provided. Mailings will now also provide updates such as the Britania Bulletin newsletter. This is for the benefit of local residents in particular, so there is no need for them to keep checking the website to see if there is any new information on the 3Rs project. This mailing list is being added to all the time and will continue to ensure all those who want to be informed are kept up-to-date.
- Public Exhibition and Graphic Panels: An exhibition was held at the Roffey Millennium Hall, Crawley Road, Horsham, on 7th October 2016 between 5pm and 7pm and 8th October 2016 between 10am and 1pm. A further exhibition was held at the Roffey Millennium Hall, Crawley Road, Horsham, on 26th January 2018 between 5pm and 7pm and 27th January 2018 between 10am and 1pm. Information panels were exhibited informing of the development, and images of these were also placed on the website. Copies of the latest newsletter were also available at the exhibition and for viewing and downloading from the website along with the advert. Key staff were on hand to show visitors around the information panels and to answer their questions. There was also supporting literature, maps and photomontages giving potential views from various locations, including views from local residential properties.
- Engagement with the Local Business Community: Local business neighbours in the Langhurstwood Road Wealden Brickworks industrial area, which are the immediate neighbours of the applicant site were also contacted.

4.3 Scope of this Environmental Statement

- 4.3.1 Taking account of the nature, size and location of the project, the information provided within the Scoping Opinion and other consultation responses provided throughout the EIA process, the following topics have been identified as key issues to be considered within the ES:

- Landscape and Visual Assessment;
- Traffic and Transport;
- Air Quality and Odour;
- Noise and Vibration;
- Archaeology and Cultural Heritage;
- Hydrology and Flood Risk;
- Hydrogeology and Ground Conditions; and
- Ecology and Nature Conservation.

4.3.2 Table 4.1 sets out the contents of this ES.

Table 4.1: Contents of this ES

Structure of ES	
Non-Technical Summary	Summary of the ES using non-technical terminology
Volume 1: Text	
	Glossary
Chapter 1	Introduction
Chapter 2	Site Description and Description of Development
Chapter 3	Need and Alternatives Considered
Chapter 4	Environmental Assessment Methodology
Chapter 5	Landscape and Visual Assessment
Chapter 6	Traffic and Transport
Chapter 7	Air Quality and Odour
Chapter 8	Noise and Vibration
Chapter 9	Archaeology and Cultural Heritage
Chapter 10	Hydrology and Flood Risk
Chapter 11	Hydrogeology and Ground Conditions
Chapter 12	Ecology and Nature Conservation
Chapter 13	Population and Health
Chapter 14	Summary of Mitigation and Monitoring
Volume 2: Figures	
Including all figures and drawings to accompany the text.	
Volume 3: Appendices	
Including specialist reports forming technical appendices to the main text.	

4.3.3 Table 4.2 summarises some of the key environmental related concerns/topics raised through feedback received from the consultation process and sets out where the issues are addressed in the ES. Details of comments received within the formal Scoping Opinion and how these have been considered in the ES are set out in the individual topic chapters.

Table 4.2: Topic Areas Identified During Public Consultation

Topic Area	Location with ES
Site Selection	Chapter 3: Need and Alternatives Considered (also considered in the Planning Statement)
Need	Chapter 3: Need and Alternatives Considered (also considered in the Planning Statement)
Operational Details	Chapter 2: Site Description and Description of Development
Construction Details	Chapter 2: Site Description and Description of Development See also construction effects section of topic chapters (Chapters 5-13)
Visual Impact	Chapter 5: Landscape and Visual Assessment
Traffic	Chapter 6: Traffic and Transport
Air Quality	Chapter 7: Air Quality and Odour Chapter 13: Population and Health
Noise	Chapter 8: Noise and Vibration
Safety & Pollution Control	Chapter 2: Site Description and Description of Development Chapter 7: Air Quality and Odour
Potential impacts to groundwater	Chapter 11: Hydrogeology and Ground Conditions
Potential Cumulative Impacts with other developments	Topic chapters (Chapters 5-13)
Regulation	Chapter 2: Site Description and Description of Development
Community Liaison	Chapter 4: Environmental Assessment Methodology (see also Statement of Community Involvement)

Climate Change

Climate Change Resilience

- 4.3.4 Resilience to future climate change has been considered during the design process. The design has taken into account, for example, future flood risk and resilience to extreme weather events. The conceptual surface water drainage strategy for the project demonstrates that surface water run-off can be practicably managed, mimicking existing flows rates and, where possible, providing a betterment. Attenuation would comprise a mix of techniques including permeable paving and underground storage in line with SuDS guidance (Appendix 10.1). Further details are provided in Chapter 2 (Site Description and Description of Development) and Chapter 10 (Hydrology and Flood Risk).

Changes to Future Environmental Conditions

- 4.3.5 Consideration of predicted changes in baseline environmental conditions, including changes resulting from climate change, has been set out within each ES topic chapter (Chapters 5 to 13), where robust information is available at the time of writing. Details are provided in the methodology section of this chapter.
- 4.3.6 The assessment of effects for each topic has taken into account identified trends or changes predicted to arise as a result of climate change.

Effects of the Project on Climate

- 4.3.7 Atmospheric emissions associated with use of the project are assessed within Chapter 7 (Air Quality) of the ES. These include emissions from construction traffic. An evaluation of the effect of the project on greenhouse gases is provided in Appendix 2.3.

Topics Scoped Out of the EIA Process

- 4.3.8 Effects on other aspects of the environment are not likely to be significant. The topics scoped out of the assessment are summarised below.

Planning Policy

- 4.3.9 A chapter on planning policy context is not included in the ES. The draft guidance on EIA from the Department for Communities and Local Government 'EIA: A Guide to Good Practice and Procedures' (DCLG 2006) (paragraph 155) states that there is no requirement to provide chapters on planning and sustainability in Environmental Statements. A separate Planning Statement has been submitted with the planning application and the environmental topic chapters within the ES each set out the policy context relevant to that topic.

Material Assets

- 4.3.10 The EIA Regulations refer to 'material assets', including architectural and archaeological heritage. The phrase 'material assets' has a broad scope, which may include assets of human or natural origin, valued for socio-economic or heritage reasons. Material assets are in practice considered across a range of topic areas within an ES, in particular the population and historic environment chapters. These topics are included within this ES. Therefore, no separate consideration of material assets is considered necessary.

Radiation and Heat

- 4.3.11 Given the nature of the proposed development, no significant radiation or heat effects are anticipated and these effects have been scoped out of the assessment.

Aerodrome Safeguarding:

- 4.3.12 Whilst the site is located within the designated Aerodrome Safeguarding zone of London Gatwick Airport, the proposed height of the stack is clear of the takeoff/landing zones and the outer horizontal surface zone. The facility has been designed to ensure that the development does not compromise the operational integrity and safety of the airport and therefore the requirement for a specific ES chapter assessing aerodrome safety has been scoped out.

- 4.3.13 In addition, the following issues have been scoped out of specific topic chapters:

- Chapter 6: Traffic – A quantitative assessment of operational traffic has been scoped out on the basis that the facility would not result in an increase in operational traffic over and above that permitted for the existing Waste Transfer Station operations at the site.
- Chapter 7: Air Quality and Chapter 12: Ecology and Nature Conservation – The requirement for an assessment of the potential effects of emissions to air on nature conservation sites has been scoped out given that there are no nationally or internationally designated sites within 10 km of the site and that the Warnham Local Nature Reserve is located more than 1 km downwind of the site.
- Chapter 7: Air Quality - A detailed assessment of operational vehicle-related emissions has been scoped out on the basis that the proposed development would not generate a substantial number of traffic movements when compared with the approved development.
- Chapter 8: Noise and Vibration – A quantitative operational vibration assessment has also been scoped out as significant operational vibration effects are considered unlikely.
- Chapter 9: Archaeology – The need for intrusive archaeological surveys has been scoped out given that previous work at the site demonstrated that there was little or no potential for archaeological remains to be present within the site.
- Chapter 11: Hydrogeology and Ground Conditions - An intrusive ground investigation has been scoped out given the information that already exists in relation to the site.

- Chapter 13: Population and Health – Consideration of socio-economics effects, as no significant effects on population or employment are considered likely (as agreed at the scoping stage).
- 4.3.14 Further details regarding the rationale and agreement to scope out these issues is provided in the relevant topic chapters.

4.4 Environmental Assessment Methodology

Relevant EIA Guidance

- 4.4.1 The EIA process has taken into account relevant government or institute guidance, including:
- Department for Communities and Local Government (2014) Planning Practice Guidance at <http://planningguidance.planningportal.gov.uk>;
 - Department of the Environment, Transport and the Regions (DETR) (1997) Mitigation Measures in Environmental Statements. HMSO;
 - Highways Agency et al. (2008) Design Manual for Roads and Bridges, Volume 11, Section 2, Part 5. HA 205/08;
 - Institute of Environmental Management and Assessment (2004) Guidelines for Environmental Impact Assessment;
 - Institute of Environmental Management and Assessment (2011) The State of Environmental Impact Assessment Practice in the UK. Special Report;
 - Institute of Environmental Management and Assessment (2015a) Environmental Impact Assessment Guide to Shaping Quality Development;
 - Institute of Environmental Management and Assessment (2015b) Climate Change Resilience and Adaptation; and
 - Institute of Environmental Management and Assessment (2016) Guide to Delivering Quality Development.
- 4.4.2 Other topic specific legislation and good practice guidance, including the National Planning Policy Framework (DCLG 2012), has been considered and details of these can be found in the topic chapters within this ES.

Key Elements of the General Approach

- 4.4.3 The assessment of each environmental topic forms a separate section of this ES. For each environmental topic in this ES, the following are addressed:
- Assessment methodology;
 - Description of the environmental baseline conditions (existing and future conditions);
 - Identification of likely effects and evaluation and assessment of the significance of identified effects, taking into account any measures designed to reduce or avoid environmental effects which form part of the project and to which the developer is committed;
 - Identification of any further mitigation measures envisaged to avoid, reduce and, if possible, remedy adverse effects (in addition to those measures that form part of the project); and
 - Assessment of any cumulative effects with other developments planned in the area.

Methodology and Assessment Criteria

- 4.4.4 Each topic chapter provides details of the methodology for baseline data collection and the approach to the assessment of effects. Each environmental topic has been considered by a specialist in that area.
- 4.4.5 Each topic chapter defines the scope of the assessment within the methodology section, together with details of the study area, desk study and survey work undertaken and the approach to the assessment of effects. The identification and evaluation of effects has been based on the information set out in the project description contained within Chapter 2 of this ES, EIA good practice guidance documents and relevant topic-specific guidance where available.

Description of the Environmental Baseline Conditions (Including Future Baseline Conditions)

- 4.4.6 The existing and likely future environmental conditions in the absence of the project are known as 'baseline conditions'. Each topic based chapter includes a description of the current (baseline) environmental conditions. The baseline conditions at the site and within the study area form the basis of the assessment, enabling the likely significant effects to be identified through a comparison with the baseline conditions.
- 4.4.7 The baseline for the assessment of environmental effects is primarily drawn from existing conditions during the main period of the EIA work in the period 2015 to 2018.
- 4.4.8 The baseline for the assessment should represent the conditions that will exist in the absence of the project at the time that the project is likely to be implemented. The anticipated start date for construction is 2019. The programme would be of approximately three years duration (including enabling works). Full operation of the site has been assumed to take place in 2022. Further information about the construction programme assessed as part of the EIA process can be found in Chapter 2 of this ES.
- 4.4.9 Consideration has been given to any likely changes between the time of survey and the future baseline for the construction of the project from 2019 and for operation of the project from 2022. In some cases, these changes may include the construction or operation of other planned developments in the area. Where such developments are built and operational at the time of writing and data collection, these have been considered to form part of the baseline environment. Where sufficient and robust information is available, such as expected traffic growth figures, other future developments have been considered as part of the future baseline conditions. In all other cases, planned future developments are considered within the assessment of cumulative effects.
- 4.4.10 The consideration of future baseline conditions has also taken into account the likely effects of climate change, as far as these are known at the time of writing. This has been based on information available from the UK Climate Projections project (UKCP09), which provides information on plausible changes in climate for the UK (Environment Agency and Met Office, 2016) and on published documents such as the UK Climate Change Risk Assessment 2017 (Committee on Climate Change, 2016).
- 4.4.11 Climate data from the UKCP09 database has been compiled for a 25 km² grid square containing the site, based on a medium emissions scenario. Mean air temperature and annual average precipitation data for the period 2020 to 2079 have been used to inform the consideration of how environmental conditions may change at the site and within the study area in future.

Mitigation Measures Adopted As Part of the Project

- 4.4.12 The EIA process is an integral part of the project appraisal and design process. During the EIA process, environmental issues have been taken into account as part of an ongoing design process. The process of EIA has therefore been used as a means of informing the design.
- 4.4.13 The project assessed within this ES therefore includes a range of measures that have been designed to reduce or prevent significant adverse effects arising. In some cases, these measures result in enhancement

of environmental conditions. The assessment of effects has taken into account measures that form part of the project and to which the applicant is committed.

- 4.4.14 The topic chapters set out the measures that form part of the project and that have been taken into account in the assessment of effects for that topic. These include:
- Measures included as part of the project design (sometimes referred to as primary mitigation);
 - Measures to be adopted during construction to avoid and minimise environmental effects, such as pollution control measures. These measures would be implemented through the Construction Environmental Management Plan (CEMP); and
 - Measures required as a result of legislative requirements.

Assessment of Effects

- 4.4.15 The EIA Regulations require the identification of the likely significant environmental effects of the project. This includes consideration of the likely effects during the construction, operation and decommissioning phases of the project. This is based on consideration of the likely magnitude of the predicted impact and the sensitivity of the affected receptor. The process by which effects have been identified and their significance evaluated is set out within each individual topic chapter.

Sensitivity or Importance of Receptors

- 4.4.16 Receptors are defined as the physical or biological resource or user group that would be affected by a project. For each topic, baseline studies have informed the identification of potential environmental receptors. Some receptors will be more sensitive to certain environmental effects than others. The sensitivity or value of a receptor may depend, for example, on its frequency, extent of occurrence or conservation status at an international, national, regional or local level.
- 4.4.17 Sensitivity is defined within each ES topic chapter and takes into account factors including:
- Vulnerability of the receptor;
 - Recoverability of the receptor; and
 - Value/importance of the receptor.

Magnitude of Impact

- 4.4.18 Impacts are defined as the physical changes to the environment attributable to the project. For each topic, the likely environmental impacts have been identified. For each topic the likely environmental change arising from the project has been identified and compared with the baseline (the situation without the project). Impacts are divided into those occurring during the construction and operation phases.
- 4.4.19 The categorisation of the magnitude of impact is topic-specific but generally takes into account factors such as:
- Extent;
 - Duration;
 - Frequency; and
 - Reversibility.

Significance of Effects

- 4.4.20 Effect is the term used to express the consequence of an impact (expressed as the 'significance of effect'). This is identified by considering the magnitude of the impact and the sensitivity or value of the receptor.

- 4.4.21 The magnitude of an impact does not directly translate into significance of effect. For example, a significant effect may arise as a result of a relatively modest impact on a resource of national value, or a large impact on a resource of local value. In broad terms, therefore, the significance of the effect can depend on both the impact magnitude and the sensitivity or importance of the receptor.
- 4.4.22 Significance levels are defined separately for each topic. Unless separately defined in the topic chapters, the assessments take into account relevant topic specific guidance, based on the following scale and guidance:
- Substantial: Only adverse effects are normally assigned this level of significance. They represent key factors in the decision-making process with regard to planning consent. These effects are generally, but not exclusively, associated with sites or features of international, national or regional importance that are likely to suffer the most damaging impact and loss of resource integrity;
 - Major: These beneficial or adverse effects are considered to be very important considerations and are likely to be material in the decision-making process;
 - Moderate: These beneficial or adverse effects may be important, but are not likely to be key decision-making factors. The cumulative effects of such factors may influence decision making if they lead to an increase in the overall adverse effect on a particular resource or receptor;
 - Minor: These beneficial or adverse effects may be raised as local factors. They are unlikely to be critical in the decision-making process, but are important in enhancing the subsequent design of the project; and
 - Negligible: No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.
- 4.4.23 The terms minor, moderate, major and substantial apply to either beneficial or adverse effects. Effects may also be categorised as direct or indirect, secondary, short, medium or long term, or permanent or temporary as appropriate.
- 4.4.24 Each chapter defines the approach taken to assessment of significance. Unless set out otherwise in each topic chapter, effects assessed as moderate or above are considered to be significant in terms of the EIA Regulations within this assessment.

Further Mitigation and Future Monitoring

- 4.4.25 Where required, further mitigation measures have been identified within topic chapters. These are measures that could further prevent, reduce and, where possible, offset any adverse effects on the environment.
- 4.4.26 Where relevant and necessary, future monitoring measures have been set out within the topic chapters.

Assessment of Cumulative Effects

- 4.4.27 The EIA Regulations require consideration of cumulative effects, which are effects on a receptor that may arise when the project is considered together with other proposed developments in the area.
- 4.4.28 The cumulative effects of the project in conjunction with other proposed schemes have been considered within each topic chapter of the ES. Other developments considered within the cumulative assessment include those that are:
- Under construction;
 - Permitted, but not yet implemented;
 - Submitted, but not yet determined; and

- Identified in the Development Plan (and emerging Development Plans - with appropriate weight being given as they move closer to adoption) recognising that much information on any relevant proposals will be limited.

4.4.29 It is noted that developments that are built and operational at the time of submission are considered to be part of the existing baseline conditions.

4.4.30 Details of the developments included as part of the cumulative assessment are provided in Appendix 4.4.

Interrelationships

4.4.31 Each topic chapter considers whether or not there are any inter-related effects with other topics included within the EIA that have not already been considered in order to identify any secondary, cumulative or synergistic effects.

Summary Tables

4.4.32 Summary tables have been used to summarise the effects of the project for each environmental topic.

4.5 References

Committee on Climate Change (2016) UK Climate Change Risk Assessment 2017.

Department for Communities and Local Government (DCLG) (2006) Environmental Impact Assessment: A Guide to Good Practice and Procedures – A Consultation Paper.

Department for Communities and Local Government (2012) National Planning Policy Framework.

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