



**Cove Communities**

# Medmerry Holiday Park

Environmental Statement – Non-Technical Summary

663871

**NOVEMBER 2023**



## GENERAL NOTES

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**Figure 1.1:** Site Location

**Figure 3.1:** Proposed Site Layout

# 1 INTRODUCTION

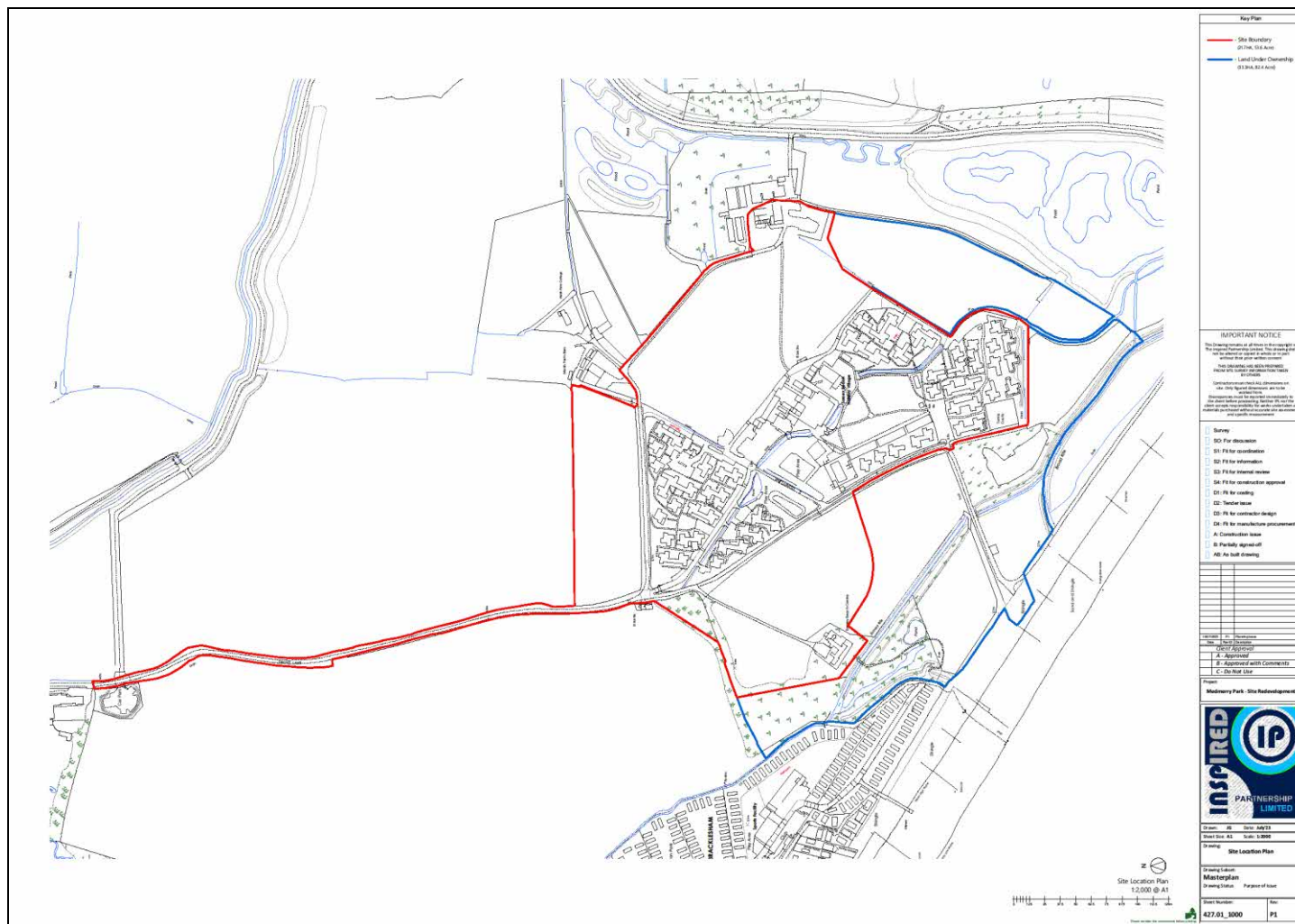
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## 1.1 Background to the Non-Technical Summary and Proposed Scheme

- 1.1.1 This is the Non-Technical Summary (NTS) of the Environmental Statement (ES) for the proposed Medmerry Holiday Park, a holiday lodge development including ancillary amenity facilities in Chichester. The ES reports on the findings of the Environmental Impact Assessment (EIA) for the Proposed Development, and this NTS summarises the key findings.
- 1.1.2 The NTS describes the Proposed Development in non-technical language, identifying the likely effects it may have on people and the surrounding environment. It describes the mitigation measures proposed by the applicant to avoid or reduce potential adverse effects that have been identified. It explains how environmental issues will be managed during the construction (including demolition of the existing buildings), operation and decommissioning of the Proposed Development.

## 1.2 Introduction to the Proposal

- 1.2.1 Cove Communities (hereafter 'the Applicant') is proposing a holiday lodge development including ancillary amenity facilities on the existing Medmerry Holiday Park in Chichester (hereafter 'the Proposed Development').
- 1.2.2 The Proposed Development comprises the phased demolition, redevelopment and refurbishment of Medmerry Park to provide 308 holiday lodges, wetland lakes, amenity lake and beach, central village hub, boathouse, children's play and picnic area, adventure playground, adventure golf and paddle tennis, beachside pool, stables, tennis courts and playing field, back of house maintenance area, associated landscaping, drainage facilities, car parking, access roads and habitat enhancement areas.
- 1.2.3 The Proposed Development is located approximately 9.8 km south of Chichester. The site lies on the existing Medmerry Park Holiday Resort. The existing site comprises of 33.3 ha within the parish of Earnley, close to Bracklesham and the Witterings (**Figure 1.1**).



**Figure 1.1: Application boundary**

1.2.4 The following terminology in **Table 1.1** was adopted throughout the ES.

**Table 1.1: Terminology Adopted throughout the ES**

Term	Explanation
the Proposed Development	Refers to the proposed residential-led mixed use development and associated infrastructure.
the Site	Refers to everything within the application red and blue line boundary.

### 1.3 Project Team

1.3.1 The Applicant has appointed RSK Environment Ltd (RSK), an experienced environmental consultancy, to coordinate the preparation of the ES which accompanies the application for planning consent to Chichester District Council (CDC). The teams that contributed to the ES were a combination of RSK Group consultants and other consultants appointed separately by the client. Those that input into the main chapters of the ES are listed below, along with the aspect(s) of the ES that each team contributed to:

- RSK Biocensus (biodiversity)
- RSK Geoscience (land and soil; material assets and waste)
- Herrington consultants (water)
- DAS Ltd. (cultural heritage)
- ClewsLA (landscape and visual)
- RSK Nature Positive (climate)
- RSK Environment (air)
- Lichfields UK (socioeconomics)
- RSK Acoustics (noise and vibration)
- ITP Ltd. (transport and access)

Other elements of the design and assessment were led by other team members and information from those workstreams has been included or referred to within the ES where necessary.

## 2 PLANNING PROCESS

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### 2.1 Consents and Applications

- 2.1.1 The Applicant is seeking to secure approval for the Proposed Development by way of a hybrid planning application under the Town and Country Planning Act to the relevant planning authority, which is CDC.

### 2.2 Environmental Impact Assessment

- 2.2.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require the Applicant to assess the likely significant effects on the environment for certain types of project. A screening opinion (to determine whether or not a project requires an EIA) was not requested from CDC since it was decided by the Applicant to submit an ES on a voluntary basis.
- 2.2.2 The ES documents the outcome of the EIA. The purpose of the ES is to ensure that any effects on the environment are fully understood and are taken into account during the design, consenting and authorisation process. The findings of the ES are outlined within this NTS.

#### **Scoping and Consultation**

- 2.2.3 As pre-application discussions with CDC had taken place, along with the feedback from a previous, refused, planning application for the site, a scoping opinion was not requested.
- 2.2.4 The Applicant has undertaken consultation with key consultees in regard to scheme design and the EIA, including meeting with CDC Officers.
- 2.2.5 The Applicant has also undertaken extensive pre-application consultation with local communities. Public information and consultation strategies have included newsletters with feedback forms, media and social media coverage, community drop-in events, and direct engagement with locally elected representatives and local community/interest groups. Further information on the activities that were undertaken, and the outcomes of this engagement, are described in **Chapter 4** of the ES, with full details in **Appendix 4.2: Statement of Community Involvement**.

#### **Approach to EIA**

- 2.2.6 An EIA is a systematic process, outlined below, undertaken to identify, predict and evaluate the environmental effects of proposed developments.
- 2.2.7 It should be noted that for the Proposed Development, different technical assessments adopt this same broad approach, but vary in the detail of how they are applied, such as study areas, established guidance or assessment criteria.

#### *Existing Environment*

- 2.2.8 Baseline studies including desk-based research and field surveys have been completed in order to collect data relating to the characteristics of the existing environment. This enabled the identification of environmental sensitivities that could be affected by the Proposed Development.

#### *Potential Impacts*

- 2.2.9 The characteristics of the Proposed Development, including the project infrastructure, construction, operation and decommissioning activities, and Schedule of Mitigation, have been considered to identify potential impacts on the existing environment.
- 2.2.10 The following types of impacts have been considered within the EIA: direct impacts and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.
- 2.2.11 Following the assessment of identified potential impacts, additional mitigation measures were identified, where necessary, to eliminate, minimise or manage the potential environmental effects.
- 2.2.12 The significance of residual effects, which are those remaining after mitigation measures have been considered, has been presented in the findings of the ES.
- 2.2.13 Any significant residual effects that the EIA identifies are key to understanding the outcome of the EIA process, because these are given the greatest weight by decision makers and stakeholders when considering an application for consent.



## 3 PROJECT DESCRIPTION

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### 3.1 Existing Environment

- 3.1.1 Medmerry Park is in the countryside a short distance away from Manhood Peninsula's southern coastline. Whilst Proposed Development is in a rural location, the edges of East Wittering and Bracklesham are located immediately to the west, separated by a watercourse and the vacant fields of Medmerry Holiday Park.
- 3.1.2 Bracklesham is a suburb of East Wittering and is located c. 830 m north-west of the Proposed Development with the East Wittering centre located c. 2.5 km north-west. The smaller towns of Earnley and Almodington are located c. 1.1 km and 1.9 km north respectively. These settlements consist of a mix of residential, commercial, and holiday properties with camp sites dotted in the surrounding area.
- 3.1.3 A public footpath (PRoW no. 55) bisects the Site, leading to the beach which is located south of the site boundary. Agricultural fields bound the north, east and west edges of the Proposed Development with Bracklesham Caravan and Boat Club adjacent to the south-west boundary.
- 3.1.4 The Proposed Development is not situated in a designated site however, it is located adjacent to Bracklesham Bay Site of Special Scientific Interest (SSSI) and 2.8 km from Pagham Harbour Special Protect Area (SPA). The fields surrounding the Site are predominately owned by RSPB forming part of the Medmerry Compensatory Habitat and is functionally linked to the Chichester and Langstone Harbours SPA.

### 3.2 The Proposed Development

- 3.2.1 The Proposed Development went through a number of design iterations to reduce potential environmental impacts. The alternative design and infrastructure layouts included a variety of layouts based around masterplan principles and site capacity for open space. **Chapter 2** of the ES Volume 1 (the main text) includes a more detailed description of the design evolution.
- 3.2.2 The main components of the Proposed Development will comprise the following two elements:
- Phased demolition, redevelopment and refurbishment of 308 holiday lodges.
  - Construction of wetland lakes and an amenity lake and beach.
  - Refurbishment of existing amenity facilities and provision of, central village hub, boathouse, children's play and picnic area, adventure playground, adventure golf and paddle tennis, beachside pool, outdoor amenity area, back of house maintenance area, associated landscaping, drainage facilities, car parking, access roads and habitat enhancement areas.
- 3.2.3 The Proposed Development will be constructed over a number of phases. The full construction of the Proposed Development is anticipated to take approximately 6 years.
- 3.2.4 The Proposed Development masterplan is illustrated on **Figure 3.1**.



Figure 3.1: Proposed Masterplan

# 4 ENVIRONMENTAL IMPACT ASSESSMENT SUMMARY

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## 4.1 Introduction

- 4.1.1 This section outlines the predicted environmental effects of the Proposed Scheme. Detailed assessments are included in **Chapters 6 – 18** of the main text in Volume 1 of the ES.

## 4.2 Biodiversity

- 4.2.1 Comprehensive ecological baseline information was collected through desktop studies and a full suite of field surveys conducted over several years following recognised standard methodologies. The data has been analysed to identify the relevant ecological features that would be sensitive to significant effects arising from the Proposed Development.
- 4.2.2 From the early stages of the project design development, an iterative process of a constraints-led design was employed, whereby ecological information was utilised to avoid impacting potentially important ecological features where possible, as embedded mitigation. The project design has evolved to incorporate changes to limit habitat loss, reduce construction and operational related disturbance, and involve the creation of valued habitats that would in turn provide positive impacts for not just ecology but for visual amenity as well. Additionally, the provision of a Construction and Environmental Management Plan (CEMP) based on best practice standard construction guidance will act to minimise and avoid construction related impacts on ecological features.
- 4.2.3 Internationally designated sites identified within 10 km of the Proposed Development include two Special Protection Areas (SPA), two of which are also designated as Ramsar sites, and one Special Area of Conservation (SAC). This also includes the Medmerry Reserve Compensatory Habitat which lies directly adjacent to the Site on the east. An initial screening of a Habitat Regulations Assessment (HRA) undertaken deemed that provided mitigation is implemented as part of the Proposed Development in accordance with a CEMP and project design embedded mitigation, then significant adverse effects on the integrity of any internationally designated sites would not occur. Measures included within the CEMP are those stated as best practice standard construction and operation guidance and are more than likely to avoid and prevent significant effects to the integrity of the designated sites.
- 4.2.4 Other sensitive ecological features include two nationally designated sites (high importance/sensitivity), the water vole, reptile, bat, and bird population assemblages (medium importance/sensitivity), the majority of habitats (including hedgerows), amphibians, invertebrates (low importance/sensitivity), as well as badgers and other mammals (negligible importance/sensitivity) and invasive non-native species which were all brought forward for assessment of effects.
- 4.2.5 In the absence of mitigation, adverse **Moderate** significant effects were predicted for:
- Loss of hedgerow habitat.
  - Loss of potential roost sites for bats due to the demolition of existing buildings.
  - Loss of potential roost sites for bats due to the removal of trees.
  - Mortality of bats roosting in buildings and trees.

Loss and fragmentation of breeding habitat for birds due to the demolition of existing buildings.

Incidental mortality of water voles during construction.

Damage to water vole burrows during construction.

Disturbance and displacement of water voles during construction.

- 4.2.6 Mitigation measures for the above include re-planting, habitat improvements, nest box installation, sensitive construction working practices, pre-construction surveys and any necessary license applications and associated species-specific mitigation.
- 4.2.7 Enhancement measures will be delivered as part of the Proposed Development to ensure an overall positive effect on ecological features and a Biodiversity Net Gain (BNG) is achieved. The BNG assessment identified a post-development gain of 6.06%, with a 185.46% gain in hedgerows, and a 37.85% gain in linear aquatic features. Such enhancement measures include lowland meadow creation, wetland creation, grassland creation and enhancement, hedgerow planting and enhancement, scrub enhancement, pond creation and enhancement, woodland planting, bee poles, bat boxes, habitat piles, and education signage boards. A Landscape and Ecological Management Plan (LEMP) will be produced to outline the long-term objectives and targets of the enhancement measures, along with prescriptions for management and monitoring.
- 4.2.8 Considering the scope for effects from the Proposed Development, and the importance and sensitivities of the ecological features, it is deemed that the mitigation measures will be sufficient to avoid significant effects with no more than **Minor adverse** residual effects anticipated as a result of construction. Additionally, further enhancements would ensure that the project has an overall positive effect on those sensitive ecological features identified within this assessment as well as biodiversity as a whole, leading to overall **Minor beneficial** residual effects during operation.

## 4.3 Land and Soil

- 4.3.1 The chapter assesses a range of potential effects associated with the design, construction and operation of the Proposed Development in relation to ground conditions and contamination, including:

Existing contamination in soil or groundwater.

Health effects to people (construction workers, site occupiers and neighbours) from construction activities.

Health effects to people (site occupiers and visitors) from any contamination during occupation.

Health effects to flora and fauna both on and off site from construction activities and during occupation of the Proposed Development.

- 4.3.2 The assessment of ground conditions has involved the review and collation of information pertaining to the current condition of the land and soils at the site and the potential risks they could pose to the environment and future site users. Further information has been established from a review of relevant environmental database information and the preparation of Phase 1 desk study report (PRA) dated March 2023.

- 4.3.3 Sensitive environmental and other receptors identified within the PRA study include:

Current and future site users – residents, site users, workers, visitors, holiday residents etc.

Current and future site users - public open space users, commercial/industrial workers.

Current adjacent site users – residential, commercial, public open space users.

Current and future buildings, utilities, infrastructure, and services.

Groundwater within the underlying Earnley Sand Formation bedrock classed as a Secondary A aquifer, and secondary undifferentiated aquifer within the superficial deposits.

Surface water features located on-site, which flow towards Stilts Pond immediately southeast of the site boundary and RSPB Medmerry Nature Reserve, which comprises the marshlands beyond and to the east of the site.

- 4.3.4 It was found that there was no risk to the majority of the site from ground contamination. However, the area around the set of derelict structures has potential for ground contamination risk. Although, no obvious surface staining or spillages were visible the amount of ‘fly-tipping’ present means that potential contamination in this area cannot be ruled out. Therefore, further surveys have been recommended prior to demolition and construction.

#### **Potential impacts during construction:**

- 4.3.5 *Construction Workers:* Construction workers are considered to be of a high sensitivity, however, since possible contamination is potentially localised and exposure is likely to be limited, the effect is considered to be **Moderate adverse**. The wearing of appropriate PPE by construction workers is considered to further mitigate this effect.
- 4.3.6 *Neighbouring properties:* Due to the likely localised nature, and potentially negligible concentrations harmful materials in the fly-tipped area, it is considered that construction works will not lead to a significant release of soil dust that would impact neighbouring land/properties located to the west of the site. Mitigation measures would be implemented during the works to further reduce any potential risk. It is therefore considered that the magnitude of the effect is **Negligible**.
- 4.3.7 *Groundwater and surface waters:* Spillage of fuel oils stored on-site has the potential to impact groundwater and surface water. Therefore, any storage of fuels will be carried out in line with current best practice (i.e. in water-tight units, located away from watercourses, within spill protection equipment etc.). It is therefore considered that the magnitude of the effect is **Minor adverse**.
- 4.3.8 Contaminants getting into the underlying groundwater or enter nearby drainage ditches during construction works is considered to be unlikely, given the absence of identified contamination. Asbestos is immobile and will not impact groundwater or surface waters. The magnitude of the effect is considered to be **Negligible**.

#### **Potential impacts during Operation:**

- 4.3.9 *Future site users:* Further testing will be carried out to fully characterise the risk from within the development area where residential accommodation is to be constructed. Whilst future site users are considered to be a high sensitivity receptor, the potential for exposure is low, giving rise to a **Moderate adverse** effect.
- 4.3.10 *Building Services:* It is considered unlikely that building structures, utilities and services would be laid in areas of contaminated soil. As a consequence, the effect is considered to be **Negligible**

#### **Summary**

- 4.3.11 Overall, impact of the change in land use is assessed as **Insignificant to Minor Adverse** and considered **Not Significant**.

- 4.3.12 The impacts for the contaminated land and the geology beneath the site will be **Insignificant** or **Low** and considered **Not Significant** at this time.

## 4.4 Water

- 4.4.1 The baseline conditions have been appraised using publicly available datasets in combination with site-specific surveys and assessments. It has been identified that Medmerry Holiday Park is located within Flood Zones 2 and 3 and associated with flooding from the Park Rife and from the Sea.
- 4.4.2 At present, the existing development discharges surface water at an unrestricted rate into the Park Rife, with undeveloped areas of the Site discharging informally into the series of ditches around the site. Foul water generated by the Site currently is drained to a pumping station that pumps effluent to a public sewer to the west of the site.
- 4.4.3 The assessment of potential effects has been supported through the preparation of a Flood Risk Assessment (FRA), Surface Water Management Strategy (SWMS) and Foul Water Management Strategy (FWMS). The assessments have been undertaken in accordance with local and national policy, in consultation with statutory consultees and is supported by detailed site-specific numerical flood modelling to appraise the risk of flooding from both the sea and the Park Rife.
- 4.4.4 During the construction phase of the development, potential significant effects were identified as the risk of pollutants generated onsite discharging to the Park Rife and the risk of construction surface water runoff generation. These effects will be mitigated by the implementation of a Construction and Environmental Management Plan (CEMP) which will developed under planning condition.
- 4.4.5 The FRA, flood modelling and drainage strategies (surface and foul water) have all been produced in accordance with guidance and to be granted planning consent, a number of mitigation measures are required to be included within the design of the Proposed Development and are therefore considered to be embedded into the design. As a result of these embedded mitigation measures, operational effects are expected to be considered **Not Significant**.
- 4.4.6 Water Quality and Consumption and the details of lake construction and management (for both the activity lake and decorative lakes) will be subject to detailed design to meet ongoing statutory requirements. As a result, effects would be expected to be considered **Not Significant** in relation to this element.
- 4.4.7 With the inclusion of the embedded mitigation measures and the development of a CEMP under planning conditions it is concluded that residual effects are expected to be **Not Significant** in relation to the topic of Water.

## 4.5 Cultural Heritage

- 4.5.1 There are no listed buildings within the proposed development area. Two non-designated buildings of moderate historic interest lie outside the Proposed Development boundary. There will be no impact on these buildings and there will be **Minor / Negligible** impact on their setting as a result of development.
- 4.5.2 A full and comprehensive review of archaeological and built heritage assets is presented within the Desk Based assessment (**ES Volume 3 Appendix 9.1**). It concludes the Site has low to moderate potential for archaeology to be present for all periods. It is noted that previous archaeological investigations undertaken within the Lower Sussex Coastal Plain have yielded unexpected discoveries of archaeological activity from the later prehistoric

periods (from the Bronze Age and Iron Age periods) through to the Romano-British period.

- 4.5.3 It is considered possible that similar, and unexpected, archaeological activity and finds may be encountered on this Site, despite the low archaeological potential suggested by the DBA study. Therefore, it is suggested that a program of archaeological investigation, post determination, though undertaken in advance of development within sub-site phased development areas, should be undertaken. This may be secured by implementation of an appropriately worded Condition.
- 4.5.4 It is considered that the mitigation measures will be sufficient to avoid potential impacts with no more than **Minor adverse** residual effects anticipated as a result of construction and is therefore considered **Not Significant**.
- 4.5.5 Additionally, site focused investigation (undertaken by Condition) would ensure that the project has an overall positive effect on enhancing archaeological understanding of the site resulting in minimally a **Minor beneficial** residual effect as a result of construction.

## 4.6 Landscape

- 4.6.1 The site is located on the South coast in West Sussex, within Chichester District on the coastal frontage to the east of Bracklesham.
- 4.6.2 The assessment has identified that the Proposed Development could have some adverse landscape and visual effect, of which a small number are considered to be significant. Where significant effects have been identified these would be upon receptors either within the Site itself or immediately adjacent.
- 4.6.3 The embedded mitigation measures provide beneficial opportunities for the Site and integration of the proposals into the wider area, having the potential to deliver benefits for landscape enhancement in keeping with local landscape character for the area.
- 4.6.4 The key transformation onsite will be to lessen the density of the development and really focus on creating a well landscaped and ecologically enhanced park. Improvements to the rife corridor was one of the main drivers for the design. As a regionally important feature moving development away from this feature and strengthening the planting in and around it has greatly improved the habitat and also its legibility within the landscape. Alongside this new aquatic landscapes, woodland planting, tree and hedges will transform the site.
- 4.6.5 Impact to the landscape character, on every level, has been assessed and is considered **Not Significant**.
- 4.6.6 Due to the relatively low quality of the existing park, and the landscape led, sensitive approach to master-planning, visual impact is considered **Not Significant**.
- 4.6.7 The only areas of significant impact proved to be temporary construction effects, which are short term. Through use of additional mitigation measures, the effect has been reduced to **Not Significant**.

## 4.7 Climate

- 4.7.1 This assessment addresses the effects of the Proposed Development upon the climate (i.e., emissions of greenhouse gases: GHG) and the resilience of the Proposed Development to future climate change.

### GHG Assessment

- 4.7.2 To undertake the GHG assessment, data associated with the construction and operation of the Proposed Development was required. This comprised site plans, anticipated floor

areas of assets, industry build ups and online guidance/studies. Expected GHG emissions from these activities and the embodied carbon of materials used in construction were quantified using a calculation-based methodology.

- 4.7.3 The GHG assessment predicted emissions of 18,548 tCO<sub>2</sub>e for the construction of the Proposed Development, 83,505 tCO<sub>2</sub>e for the operation of the Proposed Development across a 60-year life span, and 123 tCO<sub>2</sub>e for decommissioning. Compared to the emissions from the current site, the Proposed Development is estimated to contribute to 38,899 tCO<sub>2</sub>e more emissions across a 60-year lifespan. This figure has been compared to the extrapolated carbon budget of the Chichester Local Authority area and found to be low in magnitude (between 0.26% and 0.7% across 5-yearly carbon budgets). Overall, the development is considered to have a **Minor adverse** effect on the climate and is therefore considered to be **Not Significant**.
- 4.7.4 A range of measures have been considered in order to mitigate the effects of the development from both a construction and operational perspective. For example, it is expected that the project will develop a Construction Environmental Management Plan to contain standard environmental protection measures to mitigate the effects of GHG emissions during construction. Operationally, over 70% of emissions may be expected to arise from visitor travel. To mitigate against this all parking spaces will have the capacity for EV charging, and owners will be encouraged to utilise this capability.

#### **Climate resilience**

- 4.7.5 For the climate vulnerability assessment, present baseline climate data was obtained from the UK Met Office. The future baseline climate data was obtained from UK Climate Projection (UKCP18) probabilistic (25 km) projections.
- 4.7.6 The vulnerability assessment identified several climate risks relating to the construction and operation phase. The majority of the risks were deemed **Negligible** to **Minor**, with some identified as being a **Moderate** significant impact which is considered **Not Significant**. **Moderate** residual effects with regards to the impact of climate change on the Proposed Development relate predominantly to the risk of coastal flooding to the site, in combination with predicted increased overall precipitation, and increased extreme precipitation events. These hazards become more likely in the medium- to long-term operation of the Proposed Development. A Flood Risk Assessment has been undertaken as part of the ES that covers the risk of flooding in more detail.
- 4.7.7 An example of possible measures to mitigate and adapt to climate change risks during operation include regular assessment of the condition and integrity of the buildings as well as to assess the condition of vegetation cover. Moreover, during construction, regular monitoring should be undertaken, and an Incident Response Plan should be developed to identify the correct policies and procedures to follow in the case of potential pluvial and coastal flooding.

## **4.8 Air**

- 4.8.1 The Site is located in an area where the main source of air pollution is likely to be road traffic emissions. The principal pollutants relevant to this assessment are considered to be NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, generally regarded as the most significant air pollutants released by vehicular combustion processes, or subsequently generated by vehicle emissions in the atmosphere through chemical reactions.
- 4.8.2 CDC currently has two declared Air Quality Management Areas (AQMAs), the nearest is the Chichester St Pancras AQMA, which is approximately 10 km north of the Proposed Development, hence the Site is not located within or near an AQMA and no air quality



monitoring stations are located within close vicinity (within 2 km) of the Proposed Development.

### **Construction Phase**

- 4.8.3 The potential effects during the demolition and construction phases include fugitive dust emissions from site activities, such as demolition, earthworks, construction and movement of construction vehicles on the local road network.
- 4.8.4 During the construction phase, site-specific mitigation measures, as detailed in the Air Quality Technical Appendix, will be implemented. With these mitigation measures in place, the effects from the construction phase are predicted to be **Not Significant**.

### **Operational Phase**

- 4.8.5 Detailed dispersion modelling of traffic emissions has been undertaken for the Proposed Development. An operation year assessment for 2025 traffic emissions has been undertaken to assess the potential exposure of the existing and proposed sensitive receptors to air pollution. All existing and proposed receptor locations, including at the nearby Bracklesham Bay SSSI, air pollutant concentrations are predicted to meet the National Air Quality Objectives and guidelines. It is therefore predicted that the effects from operation will be **Not Significant**.

## **4.9 Material Assets and Waste**

### **Materials**

- 4.9.1 During construction there will be a demand for raw materials that will have an adverse effect of reducing supplies, though recycled materials will be used where practical to reduce this demand.
- 4.9.2 The use of prefabricated lodges will significantly reduce the demand for materials and the reuse of suitable inert materials on site will significantly reduce any need for soil, stones and aggregates.
- 4.9.3 The effect of the proposed development upon materials is not considered significant at any stage. Before mitigation, the development is judged to have a “**Slight to Moderate**” adverse effect on natural resources. This is reduced to only a **Slight** adverse effect following the suggested mitigation measures.

### **Construction Waste**

- 4.9.4 Construction and demolition waste comprises of wastes arising from the construction and demolition phase and is likely to be made up of mainly inert materials such as soils, stone, concrete, brick and tile. There will also be non-hazardous elements in this waste stream such as wood, metals, plastics, cardboard and residual household-like waste. Hazardous elements will mainly consist of asbestos containing materials but may also consist of some treated woods and chemicals that might be used in the construction process (i.e., some adhesives, sealants, paints etc.).
- 4.9.5 The quantities of waste generated during the demolition phase have been difficult to estimate based on the information that is currently available. In order to determine this a pre-demolition survey will be undertaken to determine the types and quantities of waste generated during demolition activities associated with the Proposed Development.
- 4.9.6 The use of pre-built/pre-fabricated buildings on site will significantly reduce the quantity of waste generated during the construction of the 308 proposed lodges. It is also expected

that the majority of excavated waste produced during earthworks will be reused on site, assuming it is suitable.

- 4.9.7 Even before mitigation measures are implemented the impact of waste generated during the construction phase is not expected to be significant with the significance of effect judged to range from neutral for non-hazardous landfills to moderate for inert landfills. Following mitigation the residual effect to both receptors is expected to be **Slight**.

#### **Operational Waste**

- 4.9.8 The intention will be to ensure that all operational waste is diverted away from landfill towards alternative methods of waste reuse, treatment and disposal. The generation of operational waste is deemed to be **Not Significant** at any point. Mainly due to the quantities that are likely to be produced. Prior to mitigation the effect was deemed to be **Slight** and after mitigation the effect remained as **Slight**.
- 4.9.9 To support **ES Chapter 13** on Material Assets and Waste an Outline Waste Management Plan has been prepared. This plan outlines in more detail how waste will be managed at the development. This plan can be updated as more details of the development become available.

## **4.10 Socioeconomics**

- 4.10.1 The key features of the demographic and economic conditions in Chichester and the Chichester 013 MSOA are summarised as follows:

The population of Chichester is ageing, with the number of residents aged 65 and older expected to increase by 43.7% and the number of residents aged between 16 and 64 expected to decrease by 5.3% between 2021 and 2039.

Economic activity amongst residents aged between 16 and 64 in Chichester (67.7%) is lower than the South East region (80.4%) and England (78.7%) averages.

The unemployment rate in Chichester (3.8%) is similar to the England average (3.7%) but higher than the average for the South East region (3.0%).

Within Chichester 013 MSOA, there is a particular concentration of workers in the accommodation and food services sector, accounting for 14.9% of total employment. The sector accounted for 9.5% of employment in Chichester, 7.2% in the South East, and 7.4% in England.

Chichester is one of the 35% best performing (least deprived) local authorities in England. Chichester LSOA 013B, where Medmerry Holiday Park is located, is within the 35% best performing LSOAs in England.

#### **Predicted effects**

- 4.10.2 The most significant economic impacts of the proposed development will be:

A capital investment of c. £57.8 million.

Temporary construction work equivalent to 110 FTE direct construction jobs per annum during an overall build period of 6 years and 10 months. Additionally, 122 indirect and induced FTE jobs during the construction period.

A contribution of £19.7 million per annum in total (direct, indirect and induced) GVA to the South East economy from direct and indirect/induced jobs during the construction period.

Following completion, the creation of an additional 38 jobs in the low season and 70 jobs in the high season (equivalent to 41.1 FTE jobs on an annualised basis) at the Park.

New direct employment at the Park will support an additional 23.0 indirect and induced FTE jobs in the South East, of which 15.6 FTE jobs will be based in Chichester.

A contribution of £2.2 million per annum in total (direct, indirect and induced) GVA from new employment created at the Park.

The total new expenditure from visitors at the proposed development is expected to be £1.9 million per annum. This would support a total of 35.5 new FTE jobs in the region.

- 4.10.3 The Proposed Development represents a **Significant** new capital investment in the area, which will provide employment opportunities during construction and once operational. It will help to retain and attract visitor expenditure to the local area, thereby supporting further employment (**Table 4.1**).
- 4.10.4 Were the Proposed Development not to proceed, this could have adverse impacts in social and economic terms. A “do nothing” option would neglect an opportunity to contribute towards key tourism objectives, whilst leaving the current holiday park in a condition that does not meet the needs of the changing tourism industry.

**Table 4.1: Summary of socioeconomic effects.**

Topic	Nature of effect	Timescale	Significance of effect
Construction jobs	Beneficial	Temporary	<b>Major</b>
Operational jobs	Beneficial	Long-term	Moderate
Expenditure	Beneficial	Long-term	Moderate
Labour market	Beneficial	Long-term	Moderate
Deprivation	Beneficial	Long-term	Minor

## 4.11 Noise and Vibration

- 4.11.1 An unattended environmental sound survey was undertaken at four locations within the site between Tuesday 4<sup>th</sup> and Tuesday 11<sup>th</sup> April 2023 in order to determine the existing ambient sound climate at the site.
- 4.11.2 Assessment criteria have been proposed based on relevant guidance and standards.

### Construction phase

- 4.11.3 An indicative construction noise and vibration assessment has been undertaken for the site. With the Construction Environmental Management Plan (CEMP) and the proposed Best Practicable Means (BPM) in place, it is likely that the impact would be **Negligible /**

**Minor and Not Significant** at all the receptors, and therefore no additional mitigation is proposed.

#### **Operational phase**

- 4.11.4 An acoustic model of the site has been developed based on the survey data and the traffic information provided by the transport consultants.
- 4.11.5 Based on the modelling results, appropriate internal noise levels can be achieved during both the daytime and night-time periods across the site without the requirement for any specific mitigation. The predicted sound levels in external amenity areas are likely to meet the proposed criterion without specific mitigation measures across the site. The impact of existing noise levels across the site on proposed receptors are therefore **Not Significant**.
- 4.11.6 The change in noise levels as a result of traffic generated by the Proposed Development has been assessed in order to determine any noise effects on existing receptors. The results of the assessment show that the changes in noise levels due to the changes in road traffic are likely to be acceptable at all noise sensitive receptors and no specific mitigation is proposed. The impact of the change in noise levels due to the change in traffic number on existing receptors are therefore **Not Significant**.
- 4.11.7 Following concerns raised by the adjacent Royal Society for the Protection of Birds Medmerry Nature Reserve, the potential noise impact from the proposed open amenity area on the RSPB reserve and the Bracklesham Bay Site of Special Scientific Interest have been assessed. The calculated sound levels from the open amenity area are likely to be below the levels recommended in the Waterbird Disturbance Mitigation Toolkit, at the boundary of the receptors. The noise impact on birds is therefore likely to be low at both the SSSI and the RSPB reserve and therefore **Not Significant**.
- 4.11.8 There is no fixed plant proposed associated with the operation of the site, and therefore an assessment in accordance with BS4142 for any new plant items has not been undertaken. However, as requested by the environmental health department, an assessment of the potential noise impact from the storage facilities to the east of site has been undertaken. Based on the survey results, it is likely that the storage facilities will have a low impact on the Proposed Development without specific mitigation. The impact is therefore considered to be **Not Significant**.

## **4.12 Transport and access**

- 4.12.1 The Transport and Access chapter sets out the effects of the Proposed Development at Medmerry Holiday Park on the environment both during construction and operation. The effects are assessed based on the Site's current baseline travel behaviour and accessibility.
- 4.12.2 As part of the planning application process, a pre-application submission was made, with consultee responses from both Chichester District Council and West Sussex County Council. A key theme throughout the pre-application responses related to a previous, refused 2019 planning application; as such this has been taken into consideration.
- 4.12.3 It is anticipated that the operational effects of the Proposed Development will be **Negligible** as the number of units between the extant permission (granted in 2016 for holiday use of 308 units) and proposed development is not changing, therefore the number of vehicle trips would remain the same. The largest combined effect will be experienced during the construction period. This will be the period where traffic to the

Site will be at its highest level, as traffic during the operational period will remain similar to the extant permission.

- 4.12.4 During the construction period, where traffic to the Site is greatest, there is a potential increased risk of delay for other road users and traffic which may in turn have an impact upon road safety for more vulnerable road users.
- 4.12.5 However, the construction traffic that will be present will be subject to the accompanying Construction Traffic Management Plan which details construction routes for HGVs and ensures that traffic accesses the Site outside of peak traffic hours and away from sensitive receptors where their interaction with vulnerable groups would be greater. This will lower the effects of any additional traffic on the local road network that could impact aspects such as road safety. Following mitigation, the Proposed Development will have **Minor adverse** impact during the construction phase.
- 4.12.6 Due to scale, proximity and potential construction traffic impact; two cumulative sites are identified in this chapter. These two developments comprise a 100-dwelling housing development in Earnley (20/03125/OUT) which was approved by appeal in August 2022; and the demolition of Earnley Concourse buildings and replacement with 32-dwellings (19/02493/OUT) which was approved by appeal in May 2022.
- 4.12.7 As such, there are likely to be inter cumulative construction effects when considering both the Proposed Development and the proposed 100- dwelling and 32- dwelling housing developments. The construction programme for these proposed housing developments are not known, but there may be crossover whereby all sites are under construction.
- 4.12.8 As such, the Construction Traffic Management Plan for the for Medmerry Holiday Park seeks to mitigate the construction effect of transport where possible. Clear communication and liaison with the Local Highway Authority (LHA) will seek to ensure any potential impact on the local highway network will be minimised.

## 4.13 Other Issues

- 4.13.1 Due to the nature of the Proposed Development, there would not be any impacts or risk of Major Accidents and Disasters, Heat and Radiation, Transboundary, or Arboriculture effects.

## 4.14 Cumulative effects

- 4.14.1 Cumulative effects can arise from the combined effect on a given receptor or resource of other committed development projects when considered in combination with the Proposed Development. For example, a proposed industrial plant may be predicted to generate low levels of emissions to air, but when such emissions are considered in combination with predicted emissions from a nearby proposed bypass, this may result in exceedances in air quality standards.
- 4.14.2 Cumulative effects can also arise from the interaction of two or more environmental effects associated with the proposed scheme on a given receptor or resource. For example, a residential receptor may be exposed to air quality degradation and increased noise levels from a project that singly may be deemed acceptable, but in combination may result in an unacceptable level of nuisance.
- 4.14.3 The following types of cumulative effects have been considered in accordance with the EIA Regulations 2017 and best practice guidance:

Intra-project combined effects – the interaction and combination of different environmental residual (post-additional mitigation) effects from within the Proposed Development affecting a receptor; and

Inter-project cumulative effects – the combined residual (post-mitigation) effects of the Proposed Development and other projects on a single receptor/resource, considering the deviation from the baseline conditions at common sensitive receptors/resources as a result of changes brought about as a result of the Proposed Development in combination with one or more other approved (committed) developments.

#### **Intra-project cumulative**

- 4.14.4 Utilising the worst-case scenario, intra-project cumulative effects have been assessed to understand the overall cumulative impact using the outcome of each ES topic. There will likely be an overall **Moderate** impact during the construction phase and a **Minor** impact during the operational phase and therefore intra-project effects would be **Not Significant**.

#### **Inter-project cumulative**

- 4.14.5 Inter-project cumulative effects have been assessed using the short-listed developments within 1 km of the site. The list only includes any approved (committed) development within a 1 km radius of the Site involving the construction of more than two dwellings. Overall, it was assessed that inter-project effects would be **Not Significant**.

## 5 CONCLUSIONS

5.1.1 A summary of the overall impact of the development on each environmental factor is detailed in below. As a result, it is anticipated that the project’s impact is **Not Significant** with the exception in terms of Socio-economics which is anticipated to provide a **Significant** benefit.

**Table 5.1: Summary of the residual impact of the Project Development on each environmental factor.**

	Construction	Operation	Significance
<b>Biodiversity</b>	Minor	Minor Beneficial	Not Significant
<b>Land and Soil</b>	Minor	Negligible	Not Significant
<b>Water</b>	Negligible	Negligible	Not Significant
<b>Cultural Heritage</b>	Minor	Negligible	Not Significant
<b>Landscape</b>	Moderate	Minor	Not Significant
<b>Climate</b>	Minor	Minor	Not Significant
<b>Air</b>	Negligible	Negligible	Not Significant
<b>Material Asset and Waste</b>	Minor	Minor	Not Significant
<b>Socioeconomics</b>	Major beneficial	Moderate Beneficial	<b>Significant</b>
<b>Noise and Vibration</b>	Minor	Minor	Not Significant
<b>Transport and Access</b>	Minor	Negligible	Not Significant