Cove Communities

Sustainability Statement

Medmerry Holiday Park

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GENERAL NOTES

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1 INTRODUCTION

1.1 RSK Environment Limited (hereafter referred to as 'RSK') has been instructed by Cove Communities (hereafter 'the Applicant') to produce this Sustainability Statement in support of a planning application to Chichester District Council for the redevelopment of Medmerry Park Holiday Village for holiday chalets and various ancillary facilities (hereafter 'the Proposed Development').

1.2 In accordance with the pre-application planning advice received by Chichester District Council on September 2022, Local Plan Policy 40: Sustainable Construction requires the production of a Sustainability Statement for all new dwellings or new non-domestic buildings. The document hereby presented is aimed to demonstrate how the Proposed Development meets the requirements of this local policy.

1.3 Chapter 1 briefly provides the context of the Proposed Development and the aim and purpose of this Sustainability Statement. Chapter 2 sets out relevant environmental sustainability planning policy requirements at the national and local levels to which this statement relates. Finally, Chapter 3 presents an appraisal of the sustainability performance of the proposals and how this performance accords with Local Plan Policy 40.

2 PLANNING POLICY FRAMEWORK

2.1 The planning policy framework on both national and regional tiers has been reviewed in order to identify those relevant policies that provide guidance to assess the sustainability credentials of the proposed development.

National Planning Policy Framework (July 2021)

2.2 The National Planning Policy Framework (hereafter 'NPPF') sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. NPPF provides a wider framework from which local planning policies are formulated and therefore it is paramount to identify the most significant content of the NPPF to understand the sustainability requirements contained in Local Plan Policy 40.

Section 2. Achieving sustainable development

2.3 Paragraph 7 sets out that the purpose of the planning system is to contribute to the achievement of sustainable development in line with international legal commitments such as the pursuance of the United Nations (UN) 17 Global Goals for Sustainable Development in the period to 2030.

2.4 Paragraph 8 stipulates that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:

a) an economic objective– to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective– to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective– to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".

2.5 Following the principles of sustainable development, the remainder of the NPPF addresses in more detail the main key topics and provides specific principles and requirements that both policymaking and decision-making should be based on.

Section 9. Promoting sustainable transport

2.6 Paragraph 110 states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

2.7 Paragraph 112 goes on to say that within this context, applications for development should, among other factors:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Section 12. Achieving well-designed places

2.8 Paragraph 130 sets out the general requirements for achieving well-designed places and advises that planning decisions should ensure that new development:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 133 stipulates that design-makers should have access to, and make appropriate use of, tools and processes for assessing and improving the design of development in line with the requirements listed above. One of them is the design toolkit 'Building for a Healthy Life'.

Section 14. Meeting the challenge of climate change, flooding and coastal change

2.9 Paragraph 154 states that new development should be planned for in ways that:

a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

2.10 Paragraph 167 confirms that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. It goes on to say that development should only be allowed in areas at risk of flooding where, in the light of this assessment it can be demonstrated that:

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;

d) any residual risk can be safely managed; and

e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Section 15. Conserving and enhancing the natural environment

2.11 Paragraph 174 advises that planning decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

2.12 Paragraph 180 provides further detail and sets out the principles that local planning authorities should follow when assessing proposals and making planning decisions where the natural environment is a key material consideration.

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable existing compensation strategy; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Section 16. Conserving and enhancing the historic environment

2.13 Paragraph 194 advises that, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

2.14 It goes on to state that the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

2.15 This Paragraph also confirms that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

2.16 Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed

against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Chichester Local Plan (2014-2019)

2.17 The Chichester Local Plan: Key Policies provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District.

2.18 Echoing the presumption in favour of sustainable development as set out in the NPFF, this Plan seeks to balance the economic, social and environmental dimensions of sustainable development. It does this by:

- Identifying development opportunities and infrastructure required to support and foster business enterprises and entrepreneurship;
- Providing opportunities to create new homes and jobs for present and future generations, with accessible facilities that support the needs of strong, vibrant and healthy communities; and
- Protecting and enhancing the unique and special qualities of our environment.

2.19 Policy 40 – Sustainable Design and Construction is essential in providing the appropriate framework to assess proposals and achieve the protection and enhancement of both built and natural environments, in other words, the third strategy of the LDP is to achieve sustainable development as listed above.

2.20 In particular, Policy 40 is aimed at ensuring that new development achieves high environmental standards, be appropriately designed for the site and its setting, and adaptable for long-term use. The supporting text of this policy provides the context in which this policy needs to be set up.

2.21 The implementation of appropriate mitigation and adaptation measures will be encouraged to the developers in order to address the potential impact of climate change. For instance, development should use sustainable design and construction methods, such as those that contribute towards energy conservation and efficiency, water efficiency, waste reduction, and material recycling and reuse. The underlying approach is to make an efficient use of limited resources. To do so, it is acknowledged that there is a need for a cross-sector collaboration across other Council departments, agencies, institutions and non-government stakeholders for reducing the impact upon the environment and therefore tackle the effects of climate change.

2.22 The supporting text of Policy 40 also highlights the role of the energy efficiency for new developments. Sunlight is a good source of energy that contributes to reduce the consumption of conventional fuels. By means of layout and orientation, passive solar design should be incorporated into new development as far as practicable. Likewise, building related energy consumption is also a significant contributor for higher energy efficiency. The need to achieve higher levels of energy efficiency and locally produced clean, low carbon and renewable energy related to new development is an important aspect of sustainable construction. However, sustainable construction for new and refurbished buildings incorporates more than just aspects of energy use. It also relates to other environmental impacts that buildings and inhabitants cause, for example,

on water drainage and usage, waste generation and the use of unsustainable materials in construction.

2.23 The aims of Policy 40 can be achieved when development for all new dwellings or for new non-domestic buildings demonstrate compliance with the specific requirements set out below.

- How the proposal aims to protect and enhance the environment, both built and natural. Where this is not possible, how any harm will be mitigated;
- The proposal achieves a minimum of 110 litres per person per day including external water use;
- New development complies with Building for Life Standards or equivalent replacement national minimum standards, whichever are higher, by ensuring it is accessible to all, flexible towards future adaptation in response to changing life needs, easily accessible to facilities and services; and takes into account the need for on-site waste reduction and recycling;
- Where appropriate, the proposals apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and the use of re-used or recycled materials;
- Energy consumption will be minimised, and the amount of energy supplied from renewable resources will be maximised to meet the remaining requirement, including the use of energy efficient passive solar design principles where possible;
- The proposals include measures to adapt to climate change, such as the provision of green infrastructure, sustainable urban drainage systems, suitable shading of pedestrian routes and open spaces and drought resistant planting/landscaping;
- The historic and built environment, open space, and landscape character will be protected and enhanced;
- The natural environment and biodiversity will be protected and/or where appropriate provision will be made for improvements to biodiversity areas and green infrastructure;
- The development is appropriate and sympathetic in terms of scale, height, appearance, form, siting and layout and is sensitively designed to maintain the tranquillity and local character and identity of the area; and
- The reduction of the impacts associated with traffic or pollution (including air, water, noise and light pollution) will be achieved, including but not limited to the promotion of car clubs and facilities for charging electric vehicles.

3 SUSTAINABILITY APPRAISAL

Introduction

3.1 This chapter reports an appraisal of the development proposals against the requirements of Policy 40 – Sustainable Design and Construction as laid out within Chichester Local Plan (2014-2019).

3.2 Policy 40 was aimed and accordingly worded at achieving towards the provision of permanent buildings (in particular residential dwellings) and consequently some of the policy criteria may not apply, or, apply to a lesser or different extent to a proposal of this nature. The wording of this policy acknowledges that there can be some flexibility in the standards detailed within the criteria above depending on the scope of development.

Sustainability Appraisal

3.3 To ascertain the compliance of the Proposed Development with Policy 40, the proposals have been assessed against each of ten criteria listed in this policy as follows:

3.4 **How the proposal aims to protect and enhance the environment, both built and natural. Where this is not possible, how any harm will be mitigated**

3.5 It is evidenced through the criteria below how the proposals in detail can protect the environment and has identified the significant impacts and how these can be appropriately mitigated or compensated in accordance with the relevant planning policies, regulations and best practices.

3.6 In terms of natural environment, the impact of the Proposed Development would result in the loss and/or fragmentation of some habitats and species such as hedgerows, bats and birds. These impacts shall be appropriately mitigated by means of a Construction Environmental Management Plan (CEMP), seasonal surveying of birds and bats, and the installation of nest boxes, among others. Once mitigation has been implemented, the due regard to the natural environmental is followed by enhancement measures for ecology assets. For instance, a Biodiversity Net Gain (BNG) Assessment will indicate the degree of ecology enhancement based on calculations. Likewise, a Landscape and Ecological Management Plan and measures for habitat enhancement and creation will have an overall positive effect on ecological features.

3.7 Landscaping will also contribute to mitigate the impact of the Proposed Development upon the landscape character of the area. Potential landscape and visual impacts have been considered throughout the undertaking of a Landscape and Visual Impact Assessment (LVIA). These impacts have been subsequently addressed by means of embedded mitigation in the design of the Proposed Development, including planting bunds along the northern and southwestern boundaries and retention and enhancement of existing vegetation and natural features.

3.8 During the design process of the Proposed Development, the scheme was envisaged to replace the existing 308 lodges with 308 new lodges so that it would represent no increase of holiday units on site that would have created a greater visual impact.

3.9 The massing of the new lodges has been mitigated by siting and orienting the units in strategic locations in relation with topography and landscaping features. In doing so, the roofscape will be less prominent from most of the viewpoints from adjoining land towards the site.

3.10 In respect of materiality, the holiday units will have a façade of sealed natural wood cladding with feature local stone for under crofts that will reflect the surrounding environment of the site.

3.11 **The proposal reduces average water consumption to 110 litres per person per day including external water use.**

3.12 The proposed development will provide significant reductions in water usage per person; providing modern sanitary fittings, which by nature are more efficient than the existing low-quality fittings seen throughout the site, and by introducing water saving measures such as aerators to taps and shower regulators. Units will be provided with high quality fittings, which will assist with the drive to reduce water consumption on site through introducing measures to surpass the minimum standards in each case.

3.13 For the holiday lodges specifically, it has been estimated that a total of 725 guests would be on site each day across the year (based upon average occupancy rate and 4 beds approx. per lodge for 242 lodges), each using 130 litres of water per day for the existing site (the latter as advised by the CDI water report). For the Proposed Development, it has been assumed that a total of 870 guests would be on site each day (this is based on a 20% increase in the number of beds available in comparison to the existing site) and each using 110 litres of water per day. The rate of water consumption therefore is in line with sustainability policy and building regulations.

3.14 **New development will be designed to Building for Life Standards or equivalent replacement national minimum standards, whichever are higher by ensuring it is accessible to all, flexible towards future adaptation in response to changing life needs, easily accessible to facilities and services; and takes into account the need for on-site waste reduction and recycling.**

3.15 To assist with the creation of new high-quality accommodation, which is designed to surpass the minimum statutory standards, the development has been designed to the principles set out in the Building for Life 12 Standards; further considering the creation of a successful scheme which is better for people and nature, whilst integrating with the local context and community.

3.16 The evolution of the masterplan considers the criteria set out within the standards and makes allowances in the design to ensure that the development suitably addresses the need for high-quality, considered accommodation and built form which has the opportunity to last for generations to come, adapting to the needs of the evolving household. The following is considered accordingly:

3.17 Connections – The masterplan evolution has relied on the connectivity of the site and its integration with its immediate and wider local setting, to create a sustainable development with direct links to the village of Earnley and surrounding area.

3.18 Facilities and Services – The existing development lacks material amenities and facilities which would support the current visitor numbers on site, however, considered in the

redevelopment, accommodation is supported by a series of new facilities which are spread throughout the site to provide access in close proximity.

3.19 Public Transport – Public transport is not readily available to residents of the site; however, the new masterplan development would see additional offers such as bicycle storage and provision for walking routes which would assist with reducing reliance on personal vehicles.

3.20 Provision of accommodation– The proposed re-development will provide a selection of two, three and four bed lodges in both premium and standard layouts in order to provide a wider selection of accommodation offers on site.

3.21 Character – In order to integrate the development of the site with its surrounding community, the built form and landscape has been designed to align with the local vernacular, creating a homogenised development which is tied to its location.

3.22 Working with the Site and its Context – Due to the site's sensitivity, the enhancement of the site has a particular focus on the development of the existing landscape, wildlife habitats, vegetation and existing built form – enhancements are seen in all cases, with a significant push to evolve the scheme to provide a positive outcome.

3.23 Creating Well Defined Streets and Spaces – The highway layout within the site is dictated by the existing topography and the layout of new accommodation seen throughout the site. In order to create successful layouts, all circulation on site is considered for pedestrian use, considering the street-scene from street level.

3.24 Easy to Find your Way Around – As part of the masterplan evolution and delivery it is proposed that new signage is included throughout the site to direct residents to the relevant areas whilst providing additional information and wayfinding to landmarks which surround the site i.e., the adjacent reserve and East Wittering coastline.

3.25 Streets for All – The sites circulation is considered for pedestrian use at all times, and as such, traffic calming measures are proposed to provide safe spaces for all residents to occupy.

3.26 Car Parking – All accommodation is provided with private parking, in addition to a selection of spaces being made available next to each site facility. In order to ensure that users with reduced mobility are catered for, accessible bays will be provided in public spaces throughout the site.

3.27 Public and Private Spaces – The majority of the site is made available to residents with the exception of staff and facilities areas which are clearly separated with fencing and planting in addition to clear signage. In general, all back of house facilities are included within the back of house area, a new purpose made area which will be closed off to the public.

3.28 External Storage and Amenity Space – Each unit of accommodation is provided with external storage for bicycles and bins, in addition to secure bicycle storage being made available in public spaces throughout the site.

3.29 In respect of on-site waste reduction and recycling, the proposals also include a comprehensive strategy for waste and recycling management during the phases of construction and operation.

3.30 An Outline Waste Management Plan (OWMP) has been produced to calculate estimates of waste arisings from the Proposed Development. The OWMP can be read in Appendix 13.1, ES Volume 3.

3.31 The choice of material resources and opportunities for waste reduction have been considered during the initial design phase and will be considered further during the detailed design phase of the Proposed Development. The waste hierarchy illustrates that implementing waste minimisation at the reference initial and detailed design phases are the most effective options for reducing waste generated by a Proposed Development.

3.32 The material resources required for the construction, demolition and excavation for the Proposed Development will consist of Type 1 subbase, pavement, concrete, steel and grout. Although the reuse of materials within the Site will be maximised, raw materials will still be needed for the construction works. Detailed forecasts of material resources required at the site will be refined as the development progresses.

3.33 The current proposed cut and fill analysis for the site show 56,494 m^3 of material will need to be cut from the Site. However, to achieve the levels on site 56,700 m^3 of fill material will be required. The intention is to reuse all suitable site-won material on Site.

3.34 It is proposed that all individual lodges will be constructed offsite in a factory prior to being transported to site for final assembly. Currently it is anticipated that the foundation for each lodge will comprise of a concrete pads. This strategy will further reduce the requirement for construction material at the site and the generation of waste.

3.35 With regards to recycling during the operation of the holiday park, there is a need to ensure that waste is removed from the Proposed Development and back of house areas for hygiene purposes. The OWMP provides an overview on how operational waste will be managed at the Proposed Development to comply with regional requirements.

3.36 Calculations showing the expected waste arising from the proposed lodges have been undertaken. These calculations use figures that the council has reported to DEFRA. Further calculations to show the quantity of waste that will be generated by the activities undertaken in the boathouse, facilities building, and maintenance building (non-residential) have also been provided. These calculations are based on tables provided within BS5906 and are known to be conservative. The actual quantities of waste generated by non-residential activities at the site will be determined only once the site is fully operational.

3.37 The magnitude of impact is determined as follows. For the 308 lodges, the total estimated solid waste is 8,983 litres/week. The amount of waste separated for recycling, composting and reuse (2020-2021) is 44.5%. The recyclable waste is 3,997.8 litres/week and residual waste is 4,985.2 litres/week. For the non-residential buildings, the total estimated waste is 4,675 litres/week. In a worst-case scenario, all waste including all recyclables would be sent to landfill.

3.38 To reduce the effects from both construction and operational waste, mitigation measures are explained in further detail within the Outline Waste Management Plan (Appendix 13.1, ES Volume 3). These measures include reducing waste and materials, and ensuring reuse and recycling options and targets are in line with local and national legislation, policy and guidance. Best practice measures outlined should allow the developer to achieve material and waste savings and reduce any associated environmental effects.

3.39 Internal waste storage areas will be designed into all lodges to enable occupants to segregate their waste and store it temporarily prior to transferring it to the external communal waste areas.

3.40 When considering external storage requirements for waste, it is anticipated that several communal waste storage areas will be provided across the site to ensure that they are sited within the appropriate distance of each lodge. The size of each communal waste storage area will depend upon the number of lodges it services but will contain at least one x 1,100 litre bin for recyclable waste and 1 x 1,100 litre bin for residual waste.

3.41 The 308 lodges would therefore require a total of 68 x 1,100 litre bins for residual waste; and 68 x 1,100 litre bins for recycling bins. Weekly collections are being proposed to be undertaken at the site.

3.42 Occupiers are responsible for moving waste from individual lodges to communal waste areas. Park staff will then collect containers once a week and replace them with empty ones.

3.43 In respect of non-residential buildings, it is expected that a single waste storage area will be provided for the storage of non-residential waste at each of the different facilities on site. Site staff will be responsible for collecting and bulking up the waste generated by the different facilities and activities on the park. Central storage of recycling and residual waste is most likely to be provided within the back of house compound to ensure that it is kept away from residents/users of the park.

3.44 It is assumed that the collection of non-residential waste will be undertaken by external waste management contractors. It will be the responsibility of the landlord/site management to arrange for refuse and recycling to be collected from their premises.

3.45 Waste collection frequency will be dependent upon the volume of waste generated, the storage method used (e.g., balers, bins, compactors etc) and the schedule agreed with the waste contractor.

3.46 **Where appropriate, the proposals apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and the use of re-used or recycled materials.**

3.47 To further reduce the impact of a development of this magnitude and assist with the protection of the immediate unique setting of the proposed development; new lodges are proposed to apply sustainable design principles, providing comfortable spaces whilst offering a general enhancement in the quality of accommodation on site.

3.48 New accommodation units are proposed to be constructed off-site in a factory setting, allowing for the controlled construction of units with lower environmental impact. The proposed construction route will not only reduce pollution, waste and emissions, but shall also assist in shortening the construction period significantly over traditional construction methods, therefore reducing impact on the existing development and the need to redirect guests for extended periods.

3.49 Each lodge will be considered to minimise environmental impact through the responsible purchasing of materials, waste management and reduction, and through providing transport efficiencies associated with the modular construction of the units.

3.50 The Outline Waste Management Plan (OWMP) can be read in Appendix 13.1, ES Volume 3. This plan contains a range of measures and good practices to undertake the re-use of existing materials for the re-development of the site into the new holiday park.

3.51 During the demolition phase, options for the reuse of material will be explored by the site. For instance, any asphalt lifted, treated and then reused on site is not regarded to be waste assuming certain conditions can be met (treatment can occur either on site or elsewhere).

3.52 Efforts will be made to ensure that all non-hazardous waste aggregate and soil from the excavation works is re-used on site. Much of this waste will be used to level out the ground in specified areas to prepare the ground for construction.

3.53 Vegetation removed from site will be reused where possible. Examples of reuse include the creation of habitats for wildlife and the chipping of any vegetation to create mulch.

3.54 With regards to the construction phase, the construction of prefabricated buildings within a factory has the advantage of preserving materials by reducing exposure to weather. Also, the factory is better able to ensure that materials are appropriately sized and fit for purpose, and this results in a significant reduction of offcuts and damaged materials. It has been suggested by some sources that off-site production of buildings can reduce waste by as much as 90%, though this will likely depend upon the factory and the nature and size of the building. This approach will further reduce the requirement for construction material at the site and the generation of waste.

3.55 **Energy consumption will be minimised and the amount of energy supplied from renewable resources will be maximised to meet the remaining requirement, including the use of energy efficient passive solar design principles where possible.**

3.56 Energy consumption has been extensively addressed in Chapter 11 – Climate, of the ES. Several measures are recommended to mitigate greenhouse gas (GHG) emissions as part of the operation of the Proposed Development, as listed below. Priority should be made to target visitor travel, as these emissions represent over 75% of total operational emissions:

- The use of air-sourced heat pumps consistent with the forthcoming ban related to the installation of gas boilers in residential properties which comes into force in 2025.
- The electrification of heat and cooking within the homes will lead to reduced operation emissions and take advantage of future grid decarbonisation. Lodge owners will be encouraged to sign up for renewable electricity tariff.
- Consideration of on-site renewables, e.g., solar, wind. For instance, it is envisaged that the installation of roof-mounted solar panels might be an option for the lodge buyers.
- All parking spaces will have the capacity for EV (Electric Vehicle) charging, and owners should be encouraged to install EV charging points in convenient locations on-site.
- Ensure any on-site or company vehicles are fully electric.
- Specify maximum energy efficiency plant and appliances (e.g., for office use, laptops generally use significantly less energy than equivalent desktops; ensure purchase of

residential appliances of D rating or above). For any appliance, ensure that lifecycle cost (not just up-front capital cost) is taken into account at the procurement stage.

- Encourage the running of appliances on energy-efficient modes.
- Consider energy efficient building HVAC (20°C is a typical appropriate heating-season target temperature, while 25°C should be acceptable as a cooling setpoint on warm days). Ensure HVAC isn't running in empty units.
- Use LED lighting with motion-sensors, timers and daylight compensation is in place where viable (focus on most used areas first).
- Ensure submetering at core locations to identify specific times and causes for high energy use to better target energy reduction efforts.

3.57 **The proposals include measures to adapt to climate change, such as the provision of green infrastructure, sustainable urban drainage systems, suitable shading of pedestrian routes and open spaces and drought resistant planting/landscaping.**

3.58 The EA 'Flood Map for Planning' shows that the majority of the Medmerry holiday park site is located within Flood Zone 2 and 3, with small areas of the site currently located within Flood Zone 1. The areas shown to be located within Flood Zones 2 or 3 are located within an area at risk of flooding from either the sea, or the Park Rife and/or Earnley Rife during an extreme rainfall event or a combination of these sources.

3.59 Detailed numerical flood modelling has been undertaken. The modelling findings reveal that the Medmerry holiday park site at present could be subject to flooding from both sources, with the tidal modelling showing a greater impact on the existing development.

3.60 The Medmerry holiday park site currently contains 308 holiday units which drain at an unrestricted rate into the Park Rife. Undeveloped areas of the site at present are assumed to drain informally to the series of ditches across the site which subsequently drain into the Park Rife and Earnley Rife.

3.61 In view of the existing and predicted flood risk on site, flood mitigation measures are proposed to reduce the risk of the development being flooded and ensure that the development does not have an adverse impact on flood risk elsewhere.

3.62 These measures have been designed for the entire lifetime of the development, from the early phase of demolition and construction to the operational phase of the holiday park.

<u>Demolition and Construction Phase</u>

3.63 *Construction and Environmental Management Plan (CEMP)*

A CEMP will be produced following the best practice guidance of pollution control from construction sites and will include:

- Designated areas for washing down equipment or vehicles.
- Appropriate storage areas for materials and potential hazards.
- Temporary pollution control interceptors such as spill kits and plant nappies.
- An emergency response plan in the event of a pollution incident.

3.64 *Construction Drainage Design Plan*

The CEMP will also include a Construction Drainage Design Plan which will identify the required devices to prevent construction surface water run-off.

Operational Phase

3.65 *Application of the Sequential Approach at a Local Scale*

3.66 The sequential approach to flood risk management can also be adopted on a site basis during the design of the proposals. The replacement units have been set back from the coastline on the higher parts of the site. In doing so, the proposed new lodges are located in the centre and northern parts of the holiday park away from the lowest areas of the site to the south and surrounding the Park Rife.

3.67 *Raising Floor Levels & Land Raising*

3.68 The proposed scheme represents an improvement of the existing development on the site by way of siting the new lodges further away from the coastline on higher land. Furthermore, it could even argue that no flood mitigation measures are required given that there is no net increase of holiday letting units due to the Proposed Development.

3.69 Notwithstanding this, the scheme has been designed following the best practice principles for flood risk and climate change mitigation. The scheme will incorporate a combination of land and floor level raising across the site to ensure that all the replacement lodges have an internal floor level raised above the worst-case design tidal flood level of 4.44m AOD

3.70 *Flood Resistance and Resilience*

3.71 Whilst flood resistance or ‘dry proofing’ is aimed to prevent flood water from entering the buildings, flood resilience or ‘wet proofing’ allows the ingress of flood water to the building subject to careful internal design.

3.72 All the new lodges will be elevated to the design tidal flood level and therefore internal flooding would not be expected even during an extreme event. Nevertheless, it is recommended that flood resistance and resilience measures be included up to 600mm above the design flood level as a precautionary approach to manage the impact of flooding during any exceedance events.

3.73 It is not possible to elevate the retained commercial elements in the centre of the holiday park or to alter land levels around the existing Park Rife for ecological reasons. As such, it is recommended that flood resistance and resilience measures be retrofitted into these buildings and included within any new commercial elements onsite to manage the impact of flooding.

3.74 *Flood Warning*

3.75 The EA operate a flood forecasting and warning service in areas at risk of flooding from rivers or the sea, which relies on direct measurements of rainfall, river levels, tide levels, in-house predictive models, rainfall radar data and information from the Met Office. This service operates 24 hours a day, 365 days a year.

3.76 Whilst the probability of an event of sufficient magnitude to cause floodwaters to reach the levels discussed in this report is very low, the risk of such an occurrence is always

present. It is therefore recommended that the occupants of the site sign up to the EA's Flood Warning Service.

3.77 In addition to signing up to this service, a Flood Warning and Evacuation Plan (FEP) has been prepared and will be distributed to the staff of Medmerry Holiday Park and the occupants of the lodges after the re-development. The FEP includes the following information:

- Areas of the site that are above the predicted flood level and will therefore be used as a safe haven until floodwaters recede.
- Detailed site plans that identify emergency access routes through the site.
- Information to site staff and residents on flood warning procedures.
- Emergency contact numbers and other site-specific information that will enable staff to manage the impacts of a flood event.

3.78 Further details of the FEP are available on Appendix 8.4, ES Volume 3.

3.79 **The historic and built environment, open space, and landscape character will be protected and enhanced.**

3.80 A desk-based assessment has been carried out to identify the potential effects of the Proposed Development with respect to archaeology and built heritage assets within the site and its immediate area.

3.81 Greenstone mace-head in Earnley Parish, recorded post medieval/modern drainage ducts and a geoarchaeological survey associated with Medmerry Flood Relief scheme constitute evidence of archaeological significance. Chapter 9 - Cultural Heritage concluded that their significance is low/possibly moderate and the magnitude of the impact by the development is negligible/none. No mitigation is deemed necessary; however, this could be discussed with the Historic Environment team within Chichester District Council as the planning application process goes on.

3.82 The following built heritage assets have been identified within the study area: Marsh Farm, New Barn and Marsh Barn, all of them non-designated. Furthermore, the Earnley Conservation Area hosts the following Grade II Listed Buildings: Earnley Parish Church, Earnley Place, Earnley Manor, and an old Telephone Kiosk which is non-designated.

3.83 In light of the minimal impact of the development to these built assets, the proposed mitigation will be limited to a traffic management plan to be implemented during the construction works.

3.84 The design of the proposals has also factored in the impact of the development upon the landscape character of the site and its wider area. In particular, Chapter 10 of the Environmental Statement provides details about how the significance and the effects of change resulting from the masterplan proposals have been identified and assessed in relation to the landscape character and visual amenity.

3.85 Where substantial and negative impacts have been anticipated along the lifetime of the development, a mitigation strategy has been produced which will contribute to reduce these impacts to the extent that they will not be significant. As a result of that, the Proposed Development will be appropriate in landscape and visual terms.

3.86 The landscape mitigation has two aspects: primary (strategic design) and secondary (landscape features within the proposals).

3.87 As described in ES Chapter 2, the LVIA process and potential visibility has been a key factor in influencing the layout as primary mitigation. Connections to the wider landscape, both physical and visual, have been analysed and the masterplan tailored to ensure the development presents well and reinforces any potential links which would benefit the local area.

3.88 ES Chapter 10 - Landscape includes a list of embedded mitigation measures which has been set out as the design process of the development evolved in successive iterations. Potential landscape and visual impacts have been considered from the outset and mitigation to address them has been embedded into the design of the Proposed Development. Without the embedded mitigation, development on the site would have created a far greater impact. These mitigation measures are as follows:

- Removing all development including clearance of existing development from the southern areas of the site; and relocating to less sensitive areas within the site as well as increasing the landscape buffering to the SSSI and coast.
- Creating planted bunds along the northern and southwestern boundaries to visually screen the Proposed Development.
- Retaining and enhancing existing vegetation and natural features, such as the rife, in key areas and reinforcing where necessary.
- Creating individual characters to each part of the Proposed Development which tie in with the site context and strengthen the desirable features found in the locality.
- Ensuring the site reuses all excavated material onsite to avoid muck-away traffic.

3.89 **The natural environment and biodiversity will be protected and/or where appropriate provision will be made for improvements to biodiversity areas and green infrastructure.**

3.90 ES Chapter 6 - Biodiversity assesses the current ecological baseline characteristics of the Medmerry holiday park site, including the determination of the importance of ecological features present. This chapter also evaluates the potential significance of impacts from the Proposed Development on ecological features, including potential impacts during the construction and operational stages. As a result, mitigation and enhancement measures are also proposed to minimise the potential for impacts from the Proposed Development on ecological features and deliver biodiversity enhancements where possible.

3.91 The following ecology features were identified as sensitive subject to subsequent detailed assessment of effects: internationally and nationally designated sites for conservation; habitats and flora; amphibians; badgers and other mammals; bats; birds; invertebrates; reptiles; water voles; and invasive non-native species (Japanese knotweed).

3.92 Mitigation was provided at the early stages of the project design development. Ecological information was utilised to avoid impacting potentially important ecological features where possible. This embedded mitigation was based on retaining areas of greater importance to ecological features in the design development including waterbodies, woodland, scrub, and hedgerows.

3.93 During the construction works, it is envisaged that best practice measures will be adopted to minimise potential construction impacts on ecological features. These will be detailed within a Construction Environmental Management Plan (CEMP). An Ecological Clerk of Works (ECoW) will be appointed to address issues relating to ecological features during construction, as shall be described within the CEMP.

3.94 Furthermore, the use of artificial lighting during construction would be avoided wherever possible. Where lighting would be required, directional lighting (i.e., lighting which only illuminates work areas and not nearby habitat features) would be used to prevent overspill.

3.95 To achieve noise prevention, all plant and machinery will comply with Noise Emission in the Environment for use Outdoors Regulations 2001 (as amended). The contractors shall control noise on the working areas in accordance with BS 5228, Noise Control on Construction and Open Sites. If required, acoustic barriers or screens will be erected around construction works in sensitive areas.

3.96 In terms of habitat clearance, measures to protect trees will include the installation of tree protection barriers around the root protection zones of retained trees and hedgerows. Where essential works are required within the root protection zones, ground protection will be installed following consultation with a qualified arborist.

3.97 Moreover, removal of suitable bird nesting habitat would ideally be conducted over the winter months between October and February to avoid the breeding bird season. Any required vegetation clearance within suitable reptile habitat will follow a cautious approach to avoid killing or injuring individuals.

3.98 Taking into consideration the embedded mitigation as described above, detailed assessment of potential effects on ecological features was undertaken assuming the construction and operation phases. The outcome is that no effect is anticipated during the operation of the development in the presence of embedded mitigation, and the following ecological features have been identified as having significant effects during the construction works.

Table 3.1: Potential construction impact of the Proposed Development on ecological features.

Ecological Feature	Potential impact of the construction of the Proposed Development	
Hedgerow	Habitat loss and degradation	The 26.9% loss of hedgerows to facilitate the construction of the project will be offset through the provision of 1.88km of hedgerow planting and 0.37km of hedgerow enhancement. This includes 1.32km of hedgerow planting along Drove Lane. This is likely to sufficiently offset the hedgerow loss habitat within the Site and additionally lead to a 185.46% net gain in hedgerow habitat as part of the Proposed Development.
Bats	Loss of potential roost sites due to the demolition of	The loss of the existing built structures within the Site, and the loss of some existing trees has the potential to lead to a loss of roosting habitat for bat species. It should be noted that bat activity within

	existing buildings. Loss of potential roost sites due to the removal of trees	the Site was generally recorded in low numbers and so a significant roost is not expected to be present. Additionally, activity was largely restricted to the boundary linear features rather than the areas around the buildings. Nevertheless, pre-construction roost characterisation surveys will be undertaken to ascertain the presence of any roosts and their character (i.e., species, size, maternity roost, day roost etc.), based upon best practice guidance (Collin, 2016). If roosts are found to be present, then detailed and appropriate mitigation and compensation would need to be designed. This would include consultation with Natural England and, due to the legislative protections for bats, would most likely require a European Protected Species Mitigation License (EPSML). The nature of such mitigation and compensation measures would be dependent on the character of the roost(s) present and would be assessed on a case-by-case basis. Such measures would reflect the character of the roost with temporal considerations to construction. For example, if a maternity roost is identified from pre-construction surveys, then the demolition of the buildings/felling of the trees would take place outside of the maternity season to avoid direct impacts. Alternatively, if a hibernation roost is discovered then demolition and/or felling would take place outside of the hibernation season for bats. In order to compensate for any loss of roosts, measures such as the erection of specifically designed bat mitigation buildings would be considered in suitable locations within the Site.
Birds	Loss and fragmentation of breeding habitat for birds (urban) due to the demolition of existing buildings	The loss of the existing built structures within the Site has the potential to significantly impact nesting bird species which habitually use built structures such as these. Barn swallows, house sparrows, and starlings have all been recorded nesting within the built areas of the Site. While it could be argued that this would only be a temporary impact as the majority of the buildings will be replaced, new buildings are likely to be built with totally sealed surfaces in comparison to the 'nooks, crannies and voids' present in older dilapidated buildings present within the Site. It should initially be noted that the demolition of buildings with known nesting evidence will be undertaken outside of the nesting season for birds, as would be described within a CEMP. If this is not possible, then demolition will be delayed until

		young have fledged with a species-specific disturbance buffer zone put in place, in compliance with the Wildlife and Countryside Act (1981) (as amended). In order to compensate for the loss of nesting habitat within the new buildings, integral nest boxes will be erected according to best practice guidance set out within The British Standards Institution (BSI) Standards Publication B2 42021:2022 (2022). Siting bird boxes for cavity-nesting bird species within the built environment helps to complement mitigation and biodiversity net gain strategies and helps to support the bird populations using these boxes. There are a range of integral nest boxes recommended by the BSI that: • Are suitable for most construction methods; • Conform to building regulations; • Are typically maintenance-free and remain usable for the lifetime of the building; • Are less prone to predation; • Are more thermally stable; • Are manufactured from sustainable materials; and • Are easily and unobtrusively built into the fabric of buildings without compromising either the structure or the overall aesthetics. The design and location of the integral nest boxes will conform to guidance set out by the BSI standards, ensuring appropriate positioning on buildings, locations around the Site, and appropriate materials and dimensions used. To provide a general-purpose integral nest box that serves a number of species, the dimension and shape of entrance holes will be a minimum of 30 x 65 mm. Such boxes will accommodate the following urban dwelling species: swift (*Apus apus*), starling, great tit (*Parus major*), blue tit (*Cyanistes caeruleus*), and house sparrow. Swallows can be accommodated for by using commercially available man-made swallow cups which will be positioned in open access structures, such as pergolas, verandas, open entrance lobbies, open-side car ports, or in suitable open-sided structures. To provide new and enhanced opportunities for nesting, the number of integral nest boxes to be installed within the Site will equal the number of dwellings (i.e., lodges) (BSI B2 42021:2022, 2022) with the ratio of integral nest boxes to buildings

		equalling 1:1. In practice this means that some buildings could receive more than one box reflecting the suitability of locations within the Proposed Development. In addition to the integral nest boxes, external nest boxes will also be incorporated; however, these will not be included within the 1:1 next box to building ratio. External next boxes could target species such as barn owl (*Tyto alba*), kestrel (*Falco tinnunculus*), stock dove (*Columba oenas*), Jackdaw (*Corvus monedula*), black redstart (*Phoenicurus ochruros*) etc. A bird box installation plan will be produced under a condition of planning and will cover the installation of the integral next boxes and the external next boxes (conforming to BS 42020). The installation plan will also include details for the selection, siting, positioning and installation of the boxes, specifically including: • The total number to be installed within the Medmerry holiday park site; • Design specifications of the boxes, referencing the manufacturer and model; • Site plan figure detailing the locations of the boxes on the specific buildings; • Building elevations showing the positions on each building where boxes are to be installed; and • Figure detailing the relationship between green infrastructure and the locations where integral next boxes are to be installed, illustrating access to suitable natural resources (including food, water, and nesting material).
Habitats	Incidental mortality Damage to burrows Disturbance and displacement	Construction activities (primarily demolition) taking place in close proximity to ditches inhabited by water voles have the potential to cause damage to burrows, incidental mortality, and disturbance / displacement. In order to not cause an offense under the Wildlife and Countryside Act (1981) (as amended), measures are to be implemented to mitigate these potential impacts. The avoidance of such potential impacts has been prioritised in the first instance through the implementation of embedded mitigation at the design phase. Taking this into consideration, it is likely that only demolition activities have the potential to give rise to significant effects. In order to mitigate such potential impacts, sensitive working practices will be implemented as described within a CEMP, to avoid damage to burrows, incidental mortality, and disturbance/

		displacement. Such practices would include demolition of buildings and removal of hardstanding areas by hand or with handheld machinery. The provision of an Ecological Clerk of Works (ECoW) will help to enforce such practices through a watching brief and delivery of toolbox talks as well marking out burrows and delineating sensitive areas of the watercourses. The aim of this mitigation strategy is to avoid the use of displacement and trapping and translocation strategies, since such would be disproportionate to the scale of impact. Such strategies are likely to cause more impacts to the water vole population than the demolition activities themselves. Nevertheless, in order to avoid a potential offence under the Wildlife and Countryside Act (1981) (as amended), if it becomes apparent that damage to water vole burrows cannot be avoided, then a displacement strategy will be employed, obtaining a displacement license from Natural England. In order to facilitate this strategy, watercourses with no presence of water voles would be modified and improved in the interest of the species. This is because areas further downstream already contain high population densities of water voles and owing to the species being territorial in nature, would likely not be successful. Improving watercourses with no recorded presence of water vole will allow the temporary displacement from affected areas into these improved watercourses in the period during construction. Watercourses that could undergo habitat enhancement need to be linked to the affected watercourses and as such could include Watercourse 2, 7, 9, 14, and the northern aspect of 5 which recorded no water voles. Such enhancements would include scrub and shade control, appropriate planting, and bank management. A large focus of the project design was to increase and safeguard the available habitat for water voles within the Site, owing to the species' declining conservation status and its stronghold within the local area. With that in mind, it is proposed that the rife running through the centre of the Site will be improved for water voles. This current watercourse has exposed banks and is managed to keep the grass short with little food availability for water voles (reeds and rushes). The planting of reeds and rushes will not only increase food availability but also create cover and act as a filtration system to clean the water. The 7 m buffer implemented during construction will be used to create better terrestrial habitat for the water vole population and act to limit recreational disturbance on the banks.

		Additionally, signage boards will be erected to educate visitors on the conservation of water voles and what they can do to limit disturbance. These enhancement measures will ensure that the Proposed Development leaves a positive legacy for water voles and wider biodiversity.

3.99 Considering the scope for effects from the Proposed Development, and the importance and sensitivities of the ecological features, it is deemed that the mitigation strategy described above will be sufficient to avoid significant effects with no adverse residual effects anticipated.

3.100 Once mitigation has been appropriately designed, further enhancement is proposed to 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.

3.101 The enhancement strategy consists of a set of measures as detailed in Table 3.2 below.

Table 3.2: Details of enhancement strategy measures.

Enhancement Strategy Measure	Detail
Biodiversity Net Gain (BNG Assessment)	In accordance with ecological best practice and the requirement to achieve a Biodiversity Net Gain (BNG), enhancements will be delivered to ensure the Proposed Development has an overall positive effect on ecological features. This is further detailed within the Biodiversity Net Gain (BNG) assessment report (ES Volume 3 - Appendix 6.8: Biodiversity Net Gain Assessment Report). An assessment of the pre- and post-development condition of the Site was undertaken. Post-development enhancement measures would aim to improve the condition of the existing habitats present and create new, higher ecologically valued habitats. The majority of biodiversity net gain from the Proposed Development will be achieved by off-site enhancements of habitats, most notably the modification of 8.8 ha of other neutral grassland, and planting of 1.32 km of hedgerow along Drove Lane. Further descriptions of the proposed habitat enhancements and creation are provided below. The BNG report identified the Proposed Development would yield a post-development gain of 6.06%, considering the proposed enhancement measures. A 185.46% gain in hedgerows and 37.85% gain in linear aquatic features would also result from the Proposed Development. This would not reach the 10% minimum threshold dictated by the Environment Act (2021) and the Chichester Local Plan. Further enhancement measures would therefore be required off-site to help achieve this threshold, with ongoing discussions with local stakeholders, including the nearby RSPB Medmerry Reserve, to consult on a landscape approach to achieving

	the full 10% biodiversity net gain for the Proposed Development.
Landscape and Ecological Management Plan	To prescribe further the proposed enhancement measures, a Landscape and Ecological Management Plan (LEMP) will be produced to outline the long-term objectives and targets for the enhancement measures, along with prescriptions for management and monitoring methods and responsibilities to achieve such aims. The plan will incorporate the enhancement of retained habitats and the creation of new habitats of ecological value, as detailed in the BNG assessment. The LEMP will include the following elements: • Details of the current condition and status of the Site and an outline of features that are of ecological interest; • Identification of specific objectives and measurable targets relating to the management of the Site and enhancement of its wildlife interest; • Activities which will be undertaken to manage the land to achieve the objectives and targets; and • The mechanisms to monitor progress and plan review to ensure the management plan remains up-to-date and relevant throughout its duration.
Habitat enhancement and creation	The following measures are also part of the BNG assessment to offset any habitat loss or alteration resulting from the Proposed Development, and to further enhance the Site and/or adjacent land for ecological features. The LEMP will ensure that they establish successfully and deliver long-term benefits to biodiversity to achieve a biodiversity net gain. • Creation of lowland meadow • Creation of 4.2ha of lowland meadow in two fields within the off-site enhancement area • Creation of 0.98ha and enhancement of 4.6ha of other neutral grassland in good condition. • 1.88km of hedgerow planting and 0.37km of hedgerow enhancement • 2.13ha of scrub enhancement through more appropriate management • Creation of 2.22ha of ‘priority pond habitat’ and 0.78ha of ‘non-priority pond habitat’ • Planting of 4.71ha of broadleaved woodland • Bee pole provision • Bat box provision • Habitat piles • Education signage boards Further details of the measures are available in ES Volume 1, Chapter 6 - Biodiversity.

3.102 **The development is appropriate and sympathetic in terms of scale, height, appearance, form, siting and layout and is sensitively designed to maintain the tranquillity and local character and identity of the area; and**

3.103 The main elements of the Proposed Development will include:

- 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, stables, tennis courts and playing field, back of house maintenance area, associated landscaping, drainage facilities, car parking, access roads and habitat enhancement areas.

3.104 Although there will be an increase of bedspaces by 158, the form of the Proposed Development will be sympathetic with the existing environment. The scheme will replace 308 lodges with 308 lodges so there would be no increase of holiday units on site that would have created a greater visual impact.

3.105 Taking into account the raising of levels due to flood risk mitigation, the resulting ridge heights of the holiday units will appear less prominent. The built environment will be less dense and interspersed with landscaping trees and the orientation of the units will be such that the roofscape will be less visible.

3.106 In respect of materiality, the holiday units will have a façade of sealed natural wood cladding with feature local stone for under crofts that will reflect the surrounding environment of the site.

3.107 **The reduction of the impacts associated with traffic or pollution (including air, water, noise and light pollution) will be achieved, including but not limited to the promotion of car clubs and facilities for charging electric vehicles.**

3.108 Whilst it is not anticipated that a significant proportion of holidaymakers will choose to arrive initially on foot or by bicycle, the holiday park's location will offer a wide range of options for active travel as a leisure activity during visitors' stays, therefore reducing the need for holidaymakers to travel away from the site by car to access services, facilities and tourist sites.

3.109 The site benefits from its proximity to RSPB Medmerry nature reserve and the continuous beach front along the coast, which are major attractors for the holiday park.

3.110 There is a well-established network of walking and cycling routes near the holiday park crossing the peninsula. The park is accessible and bordered by a Public Right of Way (PRoW) along its western boundary. This lane follows a fully surfaced private lane directly between the park and the village of Earnley. The proposals will also improve the existing surface and passing bays.

3.111 A link to Bracklesham is also provided via the beach which runs directly from the holiday park to Bracklesham and onwards. Equally, this also provides access to the neighbouring RSPB site and forms part of a longer circular route taking in the reserve.

3.112 The nearest recognised cycle route is Salterns Way, which follows the western coast of the Manhood Peninsula from Chichester to East Head. National Cycle Network route 88 follows the eastern coast and joins route 2 near Chichester.

3.113 The locations set out in Table 3.3 are frequented by visitors and are accessible by foot and cycling.

Table 3.3: Locations accessible by foot and cycling frequented by visitors to Medmerry Park.

Destination	Distance	Walking time	Cycling time
East Wittering Beach	0.4 km	5 min	1 min
East Wittering	3.8 km	45 min	12 min
West Wittering	6.0 km	1 hr 15 min	18 min
Chichester Harbour	7.7 km	1 hr 34 min	23 min

3.114 Access to the holiday park using public transport is limited due to its rural location. The nearest bus stops are located at the junction of Clappers Lane and Bracklesham Lane, approximately 1.8 km from the park, and are served by the frequent number 52 and 53 services to Chichester. The services operate as 'lollipop' routes with service number 52 completing a clockwise circuit and service number 53 completing an anticlockwise circuit. Combined, the two services provide up to four services an hour to Chichester.

3.115 Chichester railway station is located approximately 12 km from the holiday park and provides access to frequent services from London and along the south coast. There is no direct connection from the rail station to the site however a bus connection via a change at Bracklesham facilitates a limited degree of access. Chichester rail station also provides a taxi rank which can take users directly from the station to the site.

3.116 The reliance on motor vehicles will not be only reduced by strategic design but also by the provision of infrastructure for sustainable modes of travel. For instance, lodge buyers could have the benefit of having EV charging point installed at the car parking spaces of the lodges.

3.117 The EVs are not only anticipated for the lodge users and the holiday park car fleet used by the staff will be completely electrified.

4 CONCLUSIONS

4.1 For the purpose of the EIA process, an Environment Statement (ES) has been produced to identify and assess the extent of likely significant environmental effects of the development upon the environment. Most of the information contained in the ES has informed the policy assessment on how the proposals comply with the requirements of LDP Policy 40.

4.2 Whilst it is acknowledged that the development could result in some significant impacts upon the environment, a wide range of mitigation measures and where possible enhancement measures would be accordingly implemented to prevent any unacceptable impact. As a result, the development would achieve a high commitment with the principles of sustainable development.

4.3 The design of the new holiday park would exceed the minimum statutory standards as the scheme will comply with Building for Life Standards.

4.4 The appearance and massing of the lodges will be sympathetic with the nature of the site and the local character of the area. The landscape character and visual amenity will not result adversely harmed by reason of the Proposed Development providing the implementation of embedded mitigation. Likewise, cultural heritage has been taken into account and no unacceptable impact will occur providing that mitigation is implemented.

4.5 The prefabricated/modular construction of the lodges and the provision of renewable energy-based technologies will contribute to minimise GHG emissions during the construction and operation of the development. A robust waste and recycling management strategy will supplement the sustainability performance of the development.

4.6 Any impact upon the natural environment and biodiversity has been extensively assessed to the extent that it can be concluded that no unacceptable impact will occur subject to the adequate provision of mitigation measures. Furthermore, enhancement measures will be also implemented to exceed the set-off approach of mitigation measures.

4.7 Flood risk and water pollution have been also addressed during the phases of construction and operation. A risk-based strategic approach has been followed in accordance with planning policies. Furthermore, embedded mitigation for flood resistance and resilience is proposed to minimise any impact during the lifetime of development on the safety of holiday park users.

4.8 Sustainability in movements and transportation has been also achieved by both strategic design and embedded measures such as ensuring the viability of the installation of EV charging infrastructure.

4.9 In light of the above, the proposed development has been carefully designed to respect the environment of the site and its wider area. This Sustainability Statement demonstrates that the development is of a high sustainability profile given the full compliance of the proposals with the criteria of LDP Policy 40 and, in turn, the relevant NPPF provisions.

REFERENCES

Ministry of Housing, Communities and Local Government., (20 July 2021), 'National Planning Policy Framework (NPPF)'

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Cove Communities., (August 2023).,'Medmerry Holiday Park Environmental Statement (Volumes 1 and 3)'