

Land at Barnham, Eastergate and Westergate (BEW Parcel SC1) Environmental Statement

Chapter B: Scope and Methodology

January 2022

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B1.0 Introduction

B1.1 This chapter describes the process undertaken to identify the likely significant environmental effects giving rise to the need for Environmental Impact Assessment ('EIA'). Individual chapters (Chapters D to M, the Cumulative Impact Assessment at Chapter N, and the Mitigation and Monitoring Summary at Chapter O) then describe the specific technical methodologies adopted to identify and assess the potential environmental effects arising.

B1.2 The structure of this chapter is as follows:

- 1 Requirement for an EIA;
- 2 A summary of the process of scoping the EIA with Arun District Council ('ADC');
- 3 A review of some of the overall difficulties in the process of assessment that have arisen in carrying out the EIA. Further detail is provided in Chapters D to M where relevant and applicable;
- 4 The broad methodological approach taken for the assessment of potential environmental effects as part of this EIA, with topic specific methodologies to be detailed in chapters D to M; and
- 5 An overview of the process of consultation which has taken place to inform and assist in the process of EIA.

B1.3 The chapter should be read in conjunction with the following technical appendices provided at Volume 2 to this ES:-

- 1 **Appendix B1 - 2020 EIA Scoping Report (23 September 2020)**
- 2 **Appendix B2 - 2020 EIA Scoping Opinion (11 November 2020)**
- 3 **Appendix B3 - Cumulative assessment briefing note**
- 4 **Appendix B4 - Scoping correspondence following scheme design iterations**

B2.0 Requirement for an EIA

- B2.1 As described in Chapter A of this ES, EIA is a process undertaken in respect of certain types of development prior to the grant of planning permission.
- B2.2 The need for EIA derived from EU Directive No 2014/52/EU (Ref 1) on the assessment of certain public and private projects on the environment. The EIA Directive was first produced in 1985 as 85/337/EEC (Ref 2) and has been amended several times since. The Directive was originally incorporated into UK planning legislation in Regulations issued in 1988 with further key updates in 1999 and (for some parts of the UK including England) in 2011.
- B2.3 On 16 May 2017, the Town and Country Planning (EIA) Regulations 2017 (Ref 3) came into force in England to incorporate the requirements of the 2014 Directive into domestic legislation. On 1 October 2018, minor amendments to the Regulations came into force in the form of the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 (Ref 4). This EIA has been carried out with regard to the requirements of the 2017 EIA Regulations as updated by the 2018 Amendment Regulations (together the updated 2017 EIA Regulations (Ref 3)) and as further updated as described below.
- B2.4 On 31 January 2020 the UK officially withdrew from the European Union (EU). The updated 2017 EIA Regulations are retained as domestic legislation pursuant to the European Union (Withdrawal) Act 2018. Minor changes to the Regulations took place on 31 December 2020 pursuant to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (Ref 5). However, there is no material change to the way in which the 2017 EIA Regulations (as updated) are applied in England.
- B2.5 Further temporary amendments were made under the Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020 (Ref 6) and Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020/1398 (Ref 7). These relate to the publication of documents up to the end of 31 December 2020.
- B2.6 This ES sets out the findings of an assessment of the potential for likely significant environmental effects of the Proposed Development(s) on the basis that the Proposed Development falls within Part 10(b) of Schedule 2 of the 2017 EIA Regulations (Ref 3).
- B2.7 Part 10 (b) includes urban development projects with more than 150 dwellings.
- B2.8 For Schedule 2 developments, the 2017 EIA Regulations (Ref 3) require that an EIA is undertaken where the development is *“likely to have significant effects on the environment by virtue of factors such as its nature, size and location”*.
- B2.9 Schedule 3 of the updated 2017 Regulations (Ref 3) contains ‘selection criteria’ to be used in determining whether Schedule 2 development requires an EIA. It identifies the characteristics of the development, the sensitivity of the location and the characteristics of the potential impact as the key *‘Selection Criteria for screening Schedule 2 Development’*.
- B2.10 An EIA has been conducted in respect of the Proposed Development due to its scale and location and the nature of the potential effects arising. It considers the likelihood of significant effects arising during the construction of the Proposed Development and during its operation. Where significant adverse effects on the environment are identified, the assessment process establishes mitigation measures to prevent, reduce and, where possible, off-set the effects and monitoring measures to ensure their ongoing delivery.

B3.0 Scope of the ES

Request for an EIA Scoping Opinion

- B3.1 To assist in identifying those environmental issues requiring consideration, the 2017 EIA Regulations (Ref 3) make provision for an applicant to seek the local authority's formal opinion on the scope of the EIA (the 'scoping opinion'). The scoping opinion identifies those issues that the local authority considers may give rise to significant effects and enables the applicant to focus on the assessment on those areas.

Scoping Request (September 2020)

- B3.2 On 23 September 2020, The Southern Consortium ('the Applicant'), consisting of the C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited formally requested that ADC forms an EIA scoping opinion with respect to the Proposed Development. A copy of the request is provided at Appendix B1.
- B3.3 The request was made under Regulation 15 of the updated 2017 EIA Regulations (Ref 3) which establishes the criteria which need to be provided to assist a relevant planning authority in forming a scoping opinion. Accordingly, a summary of the likely issues, the potential effects and the proposed methodology of assessment for the identified areas of interest accompanied the request in the form of an EIA Scoping Report.
- B3.4 A red line plan was appended to the EIA Scoping Report which identified the land subject of the EIA Scoping Opinion.

Scoping Opinion (November 2020)

- B3.5 ADC consulted with both internal and external consultees as part of the preparation of its EIA scoping opinion. ADC internal consultee comments received were integrated into the main scoping opinion text, as appropriate. ADC has confirmed that the list of external consultees from whom it received comments prior to forming its scoping opinion are as follows:
- Portsmouth Water
 - Southern Water
 - Natural England
 - National Highways
 - South Downs National Park Authority
 - Environment Agency
 - West Sussex County Council (as the Highways Authority)
 - Chichester District Council
- B3.6 Copies of the external responses received were viewed from the ADC planning register using the reference number BN/112/20/EIS. Consultee comments published on ADC's website are provided at Appendix B3.
- B3.7 The scoping opinion was issued on 11 November 2020 (a copy of which is provided at Appendix B2 to this ES) and identified that the EIA should include consideration of the following matters:-
- Landscape and visual impact
 - Ground conditions, contamination and soils

- Noise and vibration
- Air quality and dust
- Water environment and drainage
- Historic environment and archaeology (as two separate ES Chapters)
- Socio-economics
- Climate change and resilience
- Ecology
- Transportation
- Cumulative impacts

B3.8 The scoping response does not confirm if any officers/ organisation were consulted or notified, but did not provide a formal response at the time of issue of the Scoping Opinion.

B3.9 As specified in the scoping opinion (Appendix B2), the scope of the EIA has also been the subject of discussion with officers at ADC and other statutory consultees and key stakeholders. Alongside issue of the scoping opinion, this has included the following pre-application meetings, focusing on different master planning issues for the Land at Barnham, Eastergate and Westergate (BEW) Strategic Allocation in the context of the Framework Masterplan, and also this outline planning application. These meetings are summarised below:

Table B3.1 Summary of pre-application meetings held

Pre- Application Meeting (ref/no)	Topic	Date
ADC Framework Masterplan pre-application meetings		
Framework Masterplan Meeting 1	Meeting to discuss the key principles and approach to be taken with respect to the Framework Masterplan.	6 th February 2020
Framework Masterplan Meeting 2	Meeting to present and discuss the initial Framework Masterplan proposals.	12 th March 2020
Framework Masterplan Meeting 3	Meeting to discuss green and blue infrastructure, sustainable transport and provide an update on the progress of the Masterplan.	7 th March 2020
Framework Masterplan Meeting 4	Meeting to discuss the east-west road land parcel.	17 th June 2020
Framework Masterplan Meeting 5	Meeting to discuss phasing and infrastructure delivery.	25 th June 2020
Framework Masterplan Meeting 6	Meeting 1 to discuss sports pitch provision and relationship with southern local centre.	13 th July 2020
Framework Masterplan Meeting 7	Meeting 2 to discuss sports pitch provision and relationship with southern local centre.	11 th August 2020
ADC Outline Planning Application Pre-Application Meetings		
Outline Application Meeting 1	Meeting to discuss a first draft of the parameter plans.	23 rd November 2020
Outline Application Meeting 2	Meeting to discuss updated drafts of parameter plans and the proposed 'Green Link' pedestrian and cycle link.	17 th February 2021
Outline Application Meeting 3	Meeting with the Leisure and Green Space officers to discuss the play space strategy.	25 th February 2021

Pre- Application Meeting (ref/no)	Topic	Date
Outline Application Meeting 4	Presentation and discussion on the transport modelling including the scenarios tested to show that the adjacent emerging schemes have been accommodated in the modelling.	22 nd April 2021
Outline Application Meeting 5	Meeting to discuss the approach to the Section 106 legal agreement.	9 th June 2021
Outline Application Meeting 6	Meeting to discuss the approach to phasing across the allocation	29 th June 2021
Advisory Group Framework Masterplan Meetings		
Advisory Group Meeting 1 (FM)	A video and audio recording of the presentation (due to Covid-19 restrictions) was provided for the Advisory Group. Members of the Group were provided with the opportunity to submit any queries/comments. These were responded to by the project team. This presentation provided attendees and members with background information, including the allocation in the Local Plan, and the initial work undertaken to prepare the Framework Masterplan.	April 2020
Advisory Group Meeting 2 (FM)	The same format as the April 2020 meeting was adopted i.e. a video and audio recording of the presentation along with the opportunity to provide comments. This presentation explained the proposed strategies developed to deliver site specific green and blue infrastructure as well as transport and connectivity.	May 2020
Advisory Group Meeting 3 (FM)	The meeting was conducted via video conferencing. A summary was provided of the proposals within the Framework Masterplan alongside the public consultation for local residents and stakeholders. This also provided an opportunity for Advisory Group members to raise any queries and for the project team to provide responses.	13 th August 2020
Advisory Group Outline Planning Application Pre-Application Meetings		
Advisory Group Meeting 1 (OPA)	A presentation was delivered which outlined plans for upcoming further consultation and sought feedback on the approach. It also provided an update on the approach to sustainability and a discussion took place concerning the emerging drainage infrastructure strategy. A question and answer session followed.	21 st January 2021
Advisory Group Meeting 2 (OPA)	A presentation was delivered that provided more detail of the emerging Outline Planning Application and a preview of the	13 th April 2021

Pre- Application Meeting (ref/no)	Topic	Date
	public consultation information. Further detail was also provided on the sustainability strategy and the latest drawing of the emerging design of the A29 realignment was presented. Discussion focused on the proposed 'Green Link' pedestrian and cycle link to the south of Barnham Road.	
Advisory Group Meeting 3 (OPA)	A review of the feedback received from the public consultation was provided alongside an overview of the planning application content. In response to queries from the April meeting on the Green Link, a briefing note including further detail on the design approach was provided.	13 th July 2021
Advisory Group Meeting 4 (OPA)	An update on the proposed phasing across the allocation was presented to the Advisory Group for review and comment. This will ultimately be appended to the Framework Masterplan.	14 th October 2021

B3.10 Meetings/correspondence has also taken place with the following key stakeholders during the preparation of the Framework Masterplan:

- 1 West Sussex County Council (education)
- 2 West Sussex County Council (highways)
- 3 Coastal West Sussex Clinical Commissioning Group
- 4 Environment Agency
- 5 Southern Water
- 6 Highways England
- 7 St Phillip Howard Catholic School
- 8 Eastergate Primary School

B3.11 For the outline planning application, alongside meetings with ADC officers, meetings have been held with statutory consultees, including:

- 1 West Sussex County Council (WSCC) Education Team to discuss the triggers and requirements for the primary school provision.
- 2 WSCC Highways Officers – please see the accompanying Transport Assessment
- 3 Environment Agency and Southern Water – please see the Environmental Statement Water Environment and Drainage chapter.

Correspondence following issue of scoping opinion

B3.12 The scoping opinion was formed in relation to the following proposal:

'Environmental scoping opinion for up to 1500 dwellings, community facilities, local centre (shops and service), a primary school and associated playing fields and early years provision (nursery).'

Immediately following issue of scoping opinion

B3.13

Following the issue of the Scoping Opinion, the following clarifications were sought with ADC. The clarifications have been addressed within the relevant technical chapter.

Table B3.2 Clarification sought from ADC following issue of Scoping Opinion

BEW Parcel SC1 Team Query	ADC clarification provided																
Cumulative approach Para 4.15 of the Scoping Opinion We would like to have a separate discussion with you on this point, and we are currently preparing a note to set out our approach to ensuring that the Proposed Development is robustly assessed within the context of the surrounding area and also within the strategic allocation. I'll contact you about this in due course.	This requirement derives from the EIA regs which requires development to take into account committed development. Our advice from our Legal Team states that whilst the term committed is set out in respect of a number of specific circumstances, we still should not overlook the impact of similar development that is coming forward which will impact upon this and vice-a-versa. You should therefore be looking to include details on land south of Barnham Road, Cala Homes and Pye Homes parcel.																
Air Quality Paragraph 4.32, bullet point 1 of the Scoping Opinion - proposed air quality monitoring strategy for the ES. We believe that a site specific monitoring survey would not assist in our assessment for the following reasons: - Any new monitoring will be conducted in a 'post-Covid19' scenario, and thus be subject to the same uncertainties as Arun's own monitoring data for 2020 – this would therefore make the monitoring no better than the three diffusion tubes deployed by the council in Barnham, "which have only been in existence since January 2020 and have been disrupted by Covid19". - From the perspective of our assessment, the only reason that monitoring data is required is to calibrate our model. It is anticipated that 2019 traffic data will be used in the baseline air quality model, which means that using 2019 air quality data would allow for consistency within our assessment and avoid issues related to Covid19. - The most sensitive areas for modelling will be those with existing air quality issues and traffic congestion i.e. Barnham, the A259 to the north of Bognor and the AQMAs in Chichester. There is already 2019 monitoring data available for these locations (Barn20, Yap19, Bog13, Bog18, extensive Chichester sites) which will be used to verify the air quality model. Differences in air quality between the monitoring sites in Bognor and Chichester and locations closer to the site, i.e. traffic flows/speeds, road type and background concentrations, will be accounted for in the model inputs.	Since my comments made in October 2020 we obviously haven't seen a return to more normal working and travel patterns yet which I had been hoping for. I am therefore inclined to agree that new monitoring at this time wont add anything to an assessment. Providing 2019 air quality monitoring and traffic data is used this should give a sensible baseline on which to base the assessment and avoid Covid 19 issues. I am therefore happy with this explanation assuming that 2019 data is used to verify the air quality model and as stated "differences in air quality between the monitoring sites in Bognor and Chichester and locations closer to the site, i.e. traffic flows/speeds, road type and background concentrations, will be accounted for in the model inputs." Please note the correct coordinates for the monitoring sites mentioned below as some of these were incorrect in the 2020 ASR published last summer. <table><tr><td>13</td><td>Rowan Way, Bognor</td><td>493408</td><td>101228</td></tr><tr><td>18</td><td>443 Chichester Road</td><td>491815</td><td>101170</td></tr><tr><td>19</td><td>B2233 Main Road</td><td>497607</td><td>103312</td></tr><tr><td>20</td><td>Barnham Road, Barnham</td><td>495950</td><td>104396</td></tr></table>	13	Rowan Way, Bognor	493408	101228	18	443 Chichester Road	491815	101170	19	B2233 Main Road	497607	103312	20	Barnham Road, Barnham	495950	104396
13	Rowan Way, Bognor	493408	101228														
18	443 Chichester Road	491815	101170														
19	B2233 Main Road	497607	103312														
20	Barnham Road, Barnham	495950	104396														

BEW Parcel SC1 Team Query	ADC clarification provided
Air Quality Paragraph 4.32, bullet point 2 of the Scoping Opinion – assessment of odour To clarify, an odour constraints assessment has been conducted by AQC, covering the whole strategic allocation. Results will be discussed briefly within the chapter for this application, which is for development of the northern section of the allocation, and we have been passed results on to the project team for the southern section of the allocation, which will be subject to a separate application.	Clarification noted. A detailed odour assessment is likely to be required for the Southern section of the allocation but more general assessment of the whole allocation should be sufficient for the northern allocation unless this raises particular concerns which would warrant further investigation.
Ecology Para. 4.64 of the Scoping Opinion - Phase 2 habitat survey in addition to ornithological (bird) surveys, botanical surveys and invertebrate surveys. We have followed up with ADC's Ecologist to clarify the need for these surveys and she has confirmed that she is content with our approach of scoping out the need for detailed invertebrate and botanical surveys at BEW. She has kindly also sent an email to yourself to confirm this point.	Noted. Please make reference to this agreement/correspondence in your ES submission for continuity purposes.
Water Paragraph 4.40 of the Scoping Opinion - wastewater treatment solutions. Discussions with Southern Water are ongoing in regards to this matter, and we have an alternative solution if capacity isn't available, which will be set out in the ES.	The solution will be for yourselves to demonstrate development can be brought forward in line with capacity. Unless detailed otherwise we'd look to phase delivery of units in line with WWT capacity.
Ecology and Water Environment Paragraphs 4.46 and 4.68-4.4.70 (inclusive) of the Scoping Opinion - reference a precautionary principle in relation to nitrate/nutrient neutrality in relevant SPAs (the Solent SPA and Chichester Harbour SPA). We have reviewed relevant guidance - relating to the Solent and Dorset Coast SPA, and the guidance doesn't apply to the Proposed Development site as it falls outside of the catchment area draining to the Solent and Chichester Harbour SPAs (map below with the site location approximately where the red star is). Can we please clarify in relation to both the Ecology and Water Environment ES chapters that impacts of nitrate/nutrient neutrality from the Proposed Development will not be assessed within these two individual chapters of the ES.	This was always noted as a potential issue arising, as it has been experienced in neighbouring District. We don't want to get caught out mid way through the application process. However, you won't need to include it as at the moment there is no evidence to suggest there are any problems with nitrate neutrality in the District of Arun at this stage.

Approach to cumulative assessment

B3.14 On 9th June 2021 a briefing note was issued to ADC for comment setting out the proposed scope for the BEW ES cumulative assessment, including the proposed approach to consideration of the wider site allocation.

B3.15 ADC provided a response on 16th June 2021 noting:

‘We can confirm that the scope is deemed acceptable. However, please note that this acceptance is given at this present moment in time and ADC reserve the right to request for additional information within the application, should this arise out of a consultee or third party representation.’

B3.16 The briefing note is appended in Appendix B3 and discussed further in Chapter N.

Following scheme design iterations

B3.17 The scoping opinion was formed on the basis that a hybrid application would be submitted in respect of the Proposed Development, with detailed design of key infrastructure relating to the Phase 2 A29 realignment and the remainder of the development being in outline. The scoping opinion confirmed that it assumed that the application would proceed on this basis.

B3.18 Following scheme design iteration, a revised approach is now being brought forward, being an outline planning application with the Phase 2 A29 realignment designed-in details. Furthermore, additional areas have been identified which may now be subject to works. For completeness, the previous maximum site boundary has been extended to include these additional areas.

B3.19 The previous maximum site boundary, submitted with the Scoping Report, comprised an area of 114.27 ha. The proposed outline redline boundary comprises an area of 92.65 ha. There are six locations where the outline redline boundary now extends beyond the previous maximum site boundary, totalling 0.046 ha.

B3.20 The works in the additional areas will be minor in scale and comprise elements of the A29 design on land south of the railway line (forming part of the ‘road zone’). The changes to the boundary do not introduce any new sensitive receptors within the site boundary and the nature of the works do not give rise to likely new significant environmental effects which were not previously identified in the Scoping Report. The changes do not impact on any of the conclusions we reached in the Scoping Report.

B3.21 With respect to the outline approach instead of a hybrid approach, no change is proposed to the content of the ES, the planning application and the level of detail to be provided or secured via the permission. The Southern Consortium remain committed to seeking detailed permission for the full length of the A29. The outline approach is considered to be clearer (compared to the hybrid approach) and ultimately achieves the same outcome of approval of a detailed road scheme.

B3.22 Formal correspondence was sent to ADC confirming this position (4th October 2021), requesting that ADC take the updated scoping boundary into account when the outline planning application and its accompanying ES is submitted (Appendix B4)

The Scope of the EIA

B3.23 In its formal EIA scoping opinion (dated 11 November 2020) (the ‘EIA Scoping Opinion’), ADC confirmed that an EIA is required for the Proposed Development, and acknowledged the general acceptability of the EIA Scoping Request (dated 23 September 2020). It is noted by the

Applicant that the EIA Scoping Opinion should be read in conjunction with the EIA Scoping Request.

B3.24 The EIA Scoping Opinion confirmed that the EIA should address the following within individual aspect chapters: -

- Landscape and visual impact
- Ground conditions, contamination and soils
- Noise and vibration
- Air quality and dust
- Water environment and drainage
- Historic environment and archaeology (as two separate ES Chapters)
- Socio-economics
- Climate change and resilience
- Ecology
- Transportation
- Cumulative impacts

B3.25 It is noted that within this ES, the technical aspect chapters have been divided and ordered as they were referred to in the EIA Scoping Request (dated 23 September 2020). However, it is confirmed that all of the environmental issues discussed in the Scoping Opinion have been covered within the ES.

B3.26 Along with discussion of the contents of these aspect chapters, the EIA Scoping Opinion prescribes a broad range of information for consideration as part of the EIA. It includes various information regarding the context of the development under the 2017 EIA Regulations (Ref 3), the wider planning submission and consideration of the application more generally.

B3.27 In accordance with the guidance set out in paragraph 38 of the EIA Planning Practice Guidance (updated March 2019)(Ref 8), the ES has been based on the Scoping Opinion and includes the information that may reasonably be required to enable the local planning authority (or Secretary of State) to come to a reasoned conclusion on the significant effects of the Proposed Development on the environment. As such, where it has become evident that a particular environmental factor is unlikely to be significantly affected by the Proposed Development and there is no need for further assessment as part of the EIA, the reasons for not undertaking such detailed assessment have been clearly set out in the ES.

B3.28 Against this background, Table B3.3 below describes how this ES responds to the EIA Scoping Opinion and identifies where and how each issue has been addressed.

B3.29 In order to keep the ES as succinct as possible, Table B3.3 below only repeats information from the Scoping Opinion where it requires a response within this ES. A copy of the full Scoping Opinion is included within Appendix B2.

Table B3.3 How ES responds to the EIA Scoping Opinion

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
Section 1: Classification of the Proposed Development and the requirement for an EIA	
Section 1 – general preamble confirming that EIA is required.	General preamble text not commented on, but acknowledged.

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
Section 2: The Site	
Paragraphs 2.1 – 2.13 comprise a description of the site and relevant environmental and policy designations.	Noted and discussed in further detail in Chapter C (Site and Scheme Description).
Section 3: Proposal	
An outline of the anticipated DoD is provided and it is noted that a Hybrid application is proposed, that the proposal includes detailed design of key infrastructure with the remainder of the development being in outline, and that a series of parameters will be established for the areas in outline. The Scoping Opinion states that it assumes the application will proceed on that basis.	The DoD is confirmed within Chapter A (Introduction and Background) of this ES, and the scheme is described in detail in Chapter C (Site and Scheme Description). An outline application (with all matters reserved except for the A29 realignment) is now proposed. Commentary is provided in this Chapter on the reason, implications and notifying ADC of this change.
The Scoping Report provided a redline plan showing the maximum extent of the application.	Following design iterations, an updated maximum extent boundary was submitted to ADC. This is discussed in further detail within this Chapter.
Section 4: Scope of the Environmental Statement	
Every ES must provide a full factual description of the development, and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible, avoid the use of jargon and be written in plain English.	Points raised have been fully addressed within all ES chapters A-O.
The ES should contain: 1 A full description of the development; 2 Measures to avoid/reduce/remedy significant adverse effects; 3 Data to identify and assess the main environmental effects; 4 An outline of the main alternatives, options and sites considered; and 5 A non-technical summary	1. The description of the development is set out in detail in Chapter C (Site and Scheme Description); 2. Mitigation measures are outlined within each technical chapter, and Chapter O (Mitigation and Monitoring) explains all measures proposed in relation to the Proposed Development; 3. Assessment and baseline data is set out and explained within each technical chapter (D-M) and within associated appendices; 4. The alternatives are set out within Chapter C; and 5. The Non-Technical Summary is Volume 3 of this ES.
Landscape and Visual Impact	
Natural England has provided advice on the scope of the ES in relation to LVIA. ADC has provided advice under separate cover on the location of the proposed viewpoints that will form the basis of the visual impact assessment.	Points raised have been fully addressed.
Comments received from the South Downs National Park Authority have concluded: - Whilst the site is 2km (at its closest) to the boundary of the South Downs National Park, it is located in the low lying coastal plain with potential for clear views from a number of high points within the SDNP according to our own View	Points raised have been fully addressed.

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
Characterisation and Analysis (2015) and accompanying cumulative Viewshed Map. - We agree with the proposed viewpoints to be considered, and in particular viewpoint 17 – Halnaker Windmill - Any work associated within the Landscape and Visual impact chapter of the Environmental Statement should explore, using evidence, how the Proposed Development will impact the setting of the SDNP, both in visual and landscape character terms. This will be a fundamental element of the baseline studies as it will help to determine the significance of a number of strands of evidence to produce a holistic understanding of the landscape character of the site and any potential impacts on the SDNP.	
Comments received from the Natural England have concluded: - The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. - The assessment should also include the cumulative effect of the development with other relevant existing or Proposed Developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescales of their progress through the planning system, cumulative impact of the Proposed Development with those proposals currently at Scoping Stage would be likely to be a material consideration at the time of determination of the planning application.	Points raised have been fully addressed.
Appendix 2 of the EIS Scoping submission details 21 viewpoints identified from a range of locations. The methodology underpinning the LVIA work has been agreed outside of this process with ADC Officers; however, this agreed methodology should be incorporated into the submitted ES.	Chapter E describes the agreed methodology.
The ES should include a night time character assessment to fully consider the impact which the development will have on the dark skies agenda.	Chapter E includes a night-time character assessment.
Whilst the Landscape Capacity of Strategic Sites in Arun District (February 2017) details the majority of the site varies from low-medium capacity, a wider area than the red line area proposed should be taken forward to fully consider the wider landscape and visual impact.	A wider area than the red line area has been considered with Chapter E.
The proposed ES should detail the inclusion of a Site Level Landscape Character Assessment, to be	A Site Level Landscape Character Assessment forms part of the assessment within Chapter E.

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
agreed with Officers. Such an assessment should be included within the submitted ES.	
Verified Visual Images/Montages (VVI/M's) included within the LVIA chapter of the ES shall be prepared in accordance with the Technical Guidance Note 06/19 on Visual Representation of Development Proposals (Landscape Institute, 17 September 2019) – as set out in the methodology in Appendix 3 of the EIS Scoping submission.	The VVMs are appended to this ES and have been prepared in accordance with the relevant technical guidance.
A Lighting Assessment will be appended to the ES and effects during the night-time will be considered in the LVIA chapter as appropriate. <i>South Downs National Park Authority:</i> - <i>The submitted EIA Scoping Report appears to scope out light pollution but it should be noted that the SDNP is designated as an International Dark Night Skies Reserve (DNS Reserve).</i> - <i>Development outside of the National Park (even when in close proximity to existing sources of sky glow) can adversely affect sky quality within the DNS Reserve</i> - <i>We would therefore advise that any lighting impacts should be assessed in terms of both the visual impact on the setting and tranquillity of the SDNP resulting from the visibility of additional luminaries in the landscape, as well as the impact the Proposed Development may have on the quality of the dark night skies of the DNS Reserve.</i>	A Lighting Assessment has been prepared and is appended to this ES. Lighting impacts, including effects during the night-time, are considered within Chapter E.
ADC will require other land within the strategic allocation outside of the control of the applicant to be given consideration; subject to relevant information being available.	This is discussed in further detail within Chapter N.
Ground Conditions and Contamination	
Environmental Health have not provided comments in respect of this EIA Scoping opinion. However, as the baseline conditions are understood to have areas of potentially contaminated land which would require further investigation before development. ADC note that providing a report which follows the Methodological Approach set out in section 15.9 of the submitted EIA Scoping Report is submitted alongside the planning application it is acceptable for this to be scoped out of the EIA.	A separate assessment considering ground conditions and contamination has been undertaken and is submitted alongside the planning application. This sits outside the scope of the EIA.
Noise and Vibration	
Comments received from Environmental Health concluded that: - I have concerns about cumulative noise from road and rail sources affecting residents of the new development and the noise assessment	Addressed in the Baseline section: Surveys have been undertaken in areas of the site that are exposed by noise from roads and the existing railway line. These have been used to assess site suitability. The combined data will also be used

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
should ensure that it takes into account all potential noise sources in combination; - Environmental Health would expect to see that the submitted noise assessment includes a scheme that proves internal noise levels within all new residential properties will conform to the “Indoor Ambient Noise Levels for Dwellings” guideline values specified within Table 4 under section 7.7.2 of BS 8233:2014 and demonstrates that the external noise levels within the curtilage of residential units will conform to the “Design Criteria for External Noise” upper guideline value of 55 dB LAeq,T as specified within section 7.7.3.2 of BS 8233:2014; - Noise assessments should also include noise and vibration from any proposed or existing pumping stations and electrical sub stations which may impact the noise environment.	when establishing glazing specifications within mitigation reports. Addressed within sections of the report that refers to operational noise. The Acoustic Façade Mitigation report at detail design stage will ensure that the glazing specification of any new dwellings will be sufficient to mitigate against traffic noise and railway noise, such that the design guidelines taken from BS8223:2014 are met. DMRB (LA111) has been followed and described throughout this chapter
The LPA requires the ES chapter on Noise and Vibration to assess the likely significant effects of the construction and operational phases of the development on the environment, with respect to noise and vibration.	This is discussed in further detail within Chapter H.
Noise levels deriving from road sources may be subject to change due to changes in traffic flows from nearby and surrounding developments. To account for these variations and changes in baseline conditions, modelling should be undertaken in accordance with the Department of Transport Calculation of Road Traffic Noise (1988; as recommended in the Design Manual for Roads and Bridges (LA111).	This is discussed in further detail within Chapter H.
Noise and Vibration assessments should be conducted in accordance with the principles set out in the National Planning Policy Framework (July 2018) or any document in succession, NPPG guidance and the Arun Local Plan (2011-2031), Guidelines for Environmental Noise Impact Assessment published by the Institute of Environmental management and Assessment in 2014.	NPPF, NPPG and the Arun Local Plan have been considered in the relevant sections of the chapter.
Construction and road traffic noise assessments, within the Environmental Statement, should be undertaken using software which meets the requirements for Quality Assurance of software for the calculation of sound outdoors, according to DIN45687 and OSP17534 Series, and fully implements the UK calculation methodologies such as Calculation of Road Traffic Noise (CRTN) and BS5228-1:2009 + A1:2014, used for construction noise predictions.	CRTN has been followed as a part of the LA111 methodology. BS5228- 1:2009 + A1:2014 has been used for construction noise predictions. Modelling has been undertaken using the Cadnaa software, which complies with the mentioned assurance requirement.

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Air Quality and Dust	
Comments received from Environmental Health concluded that: - I am disappointed to see that no real monitoring of air quality is planned as part of the EIA. The Council's two closest air quality monitoring sites are in Barnham and at the level crossing in Westergate. However, these are new sites which have only been in existence since January 2020 and have been disrupted by Covid 19 so there is very little real data from the area. I would therefore recommend that baseline data is gathered from the area through real monitoring rather than relying on predictions and modelling. Monitoring locations should be approved by the Council's Environmental Health Team prior to commencement - Traffic data used in the modelling should be based on worst case scenario figures and be projected into the future so that we are not faced with an air quality problem a few years after completion - The rerouting of the A29 is going to bring a major new road source close to the proposed housing and this raises significant concerns from both air quality and noise perspectives. I would therefore expect to see careful site layout planning to ensure that new residents are not exposed to unacceptable air quality and that projected increases in traffic levels over future years once the road and housing are fully occupied are taken into consideration to ensure that air quality objectives will not be breached within a few years of completion - The Government has plans to introduce new air quality targets as part of the Environment Bill, including objectives for PM2.5. Although these objectives are not yet known it would be useful for the air quality assessment to include PM2.5 in the area during operation as well as construction phases - An application should also include mitigation measures to reduce road traffic in the area including but not limited to electric vehicle charge points for every home with a drive or garage as well as public charging points for residents without allocated parking and visitors as well as at all business and community facilities e.g. school, community centres. The Council's existing requirements can be found in the Arun District	Points raised have been fully addressed.

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Council Electric Vehicle Infrastructure Study (November 2017) - There is no mention in the document of any assessment of odour from the sewage treatment works close to the southern site boundary. It is not clear from the maps whether any housing is proposed in this area of the site but if it is an odour assessment will be required. If no housing is proposed in this area this should be made clear so that odour can be discounted as a potential issue.	
The ES Chapter on Air Quality and Dust should take into account the wider, in-combination effects, on air quality within those nearby AQMAs.	This approach has been adopted within the Air Quality assessment within Chapter G, and the cumulative impact assessment within Chapter N.
The ES Chapter will need to give regard to the Air Quality and Emissions Mitigation Guidance for Sussex (2020) and any other relevant air quality standards and assessment criteria. The advice of Arun District Council's Environmental Health Team should be sought in formulating this chapter, including the establishment of the baseline conditions and receptor points. The LPA will require receptor points at both existing and new points within the Proposed Development to determine construction and operational effects of the development on air quality.	Points raised have been fully addressed.
The assessment methodology shall accord with that set out in the Institute of Air Quality Management's Guidance on the Assessment of Dust from Demolition and Construction. The ES will need to conclude, subject to appropriate mitigation measures commensurate with the in-combination impacts, will determine the appropriate level of mitigation required to ensure no significant effects.	Points raised have been fully addressed.
The ES chapter on Air Quality and Dust shall include an assessment on roadside pollutant concentrations and the impacts of the development-generated traffic changes. This assessment should be based on predictions deriving from the ADMS-Roads Dispersion Model and verified against local monitoring data. The model shall predict existing baseline pollutant concentrations and likely concentrations in the future, both with and without the development.	Points raised have been fully addressed.
The LPA will require the ES Chapter on Air Quality and Dust to ensure that no new homes are introduced into areas of unacceptable air quality. If the assessment suggests that such a situation will occur then the design shall be amended accordingly.	Points raised have been fully addressed.

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Water Environment and Drainage	
<i>Foul and Surface Water Drainage</i>	
Comments received from Southern Water: - Southern Water's current sewerage records show that there are foul sewers within the Proposed Development site/s. No new development/building works will be permitted to be constructed over or within 3.0 metres of the existing foul sewers. - Due to the size of the development and to protect the premises from the impact of sewage flooding, an assessment is required to ascertain an appropriate point of connection to the foul and surface water sewerage network. - Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer. - Where surface water is being discharged to our network, we require the below hierarchy for surface water to be followed which is reflected in part H3 of the Building Regulations.	Assessment confirms that assets exist within the application boundary and have been duly considered. Other items are raised in regard of appropriate methods to dispose of surface water and to engage with Southern Water in respect of identifying suitable points of connection and capacity within the foul water network.
The Water Environment and Drainage chapter in the ES shall include details on surface water and groundwater resources (quantity and quality), impacts on flood risk to the site and wider area and the existing and foul water, including sewerage infrastructure.	This is discussed in further detail within Chapter K.
The contents of Policy W DM1(3) should be fulfilled as part of a full Drainage Impact Assessment which will detail the capacity of the Waste Water Treatment Works (WWTW), in combination with other committed, anticipated and phased development. The LPA will only allow for the release of properties in line with capacity at the nearby WWTW. Sufficient evidence will be required within the ES to allow the Council to satisfy themselves in respect of this issue.	A Drainage Impact Assessment forms part of the assessment and is appended to the ES.
All evidence based documents, including the Flood Risk Assessment, shall be prepared in line with relevant planning policy and guidance shall comprise part of the Technical Appendices to the ES. This shall take into account both national and local planning policies, including local guidance (as set out in the EIS Scoping submission) related to flood risk and climate change.	A Flood Risk Assessment forms part of the assessment and is appended to the ES. The assessment has been prepared with consideration of relevant planning policy and guidance.
This Chapter of the ES, and its associated technical assessments which underpin the Chapter, should be prepared in conjunction with both the Council's relevant technical teams and Environment Agency; including, but not exclusively, their up to date mapping relevant at the time of submission.	Chapter K has been prepared in consultation with the Environment Agency, the Lead Local Flood Authority, Southern Water and Portsmouth Water.

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The EIS Scoping Opinion does not confirm whether the site falls within either a Nitrate Vulnerable Zone (NVZ) or Source Protection Zone (SPZ). Should further studies conclude that the site would affect any of these zones the ES should incorporate mitigation to be agreed with Southern Water and/or Natural England in respect of any impacts. Such impacts, if any, should take into account in-combination effects.	The Development Site sits outside any SPZ. The assessment considers potential agricultural nitrate pollution.
The LPA will require the applicants to the relevant pages of the Arun Strategic Surface Water Management Study (October 2016) which provides a framework and recommendations for surface water drainage at strategic sites. It includes information about the issues on the site, which include surface water flooding, waterlogging and high groundwater levels. The next steps and recommendations section of the Stage 3 report identifies actions which should be addressed through the ES as part of the FRA.	This is assessed within Chapter K and it's supporting Flood Risk Assessment.
Impacts on the water environment should take into account both construction phases and operational phases of the development. Consideration and evidence will be required that details how construction activities may impact upon the water environment. Such evidence shall be supported by a comprehensive mitigation strategy to ensure no site specific, nor in-combination, impacts on the water environment will result.	Points raised have been fully addressed.
The Chapter within the ES will be required to detail the mitigation strategy proposed for works which relate to Special Protection Areas and Nitrate Neutrality Zones. The ES Chapter will need to incorporate how nitrate neutrality can be achieved to provide the appropriate safeguards to any future in-combination impacts.	Points raised have been fully addressed.
Archaeology and Cultural Heritage	
Arun District Council's Archaeology Advisor comments concluded that: - I agree that an EIA for this site should include an assessment of its potential to contain structures and deposits of archaeological interest and the likelihood that these might be affected by development and to suggest suitable measures to mitigate this. - I agree that this should be undertaken as outlined in Section 11 of the scoping report.	The assessment has followed the approach set out in the scoping report.

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Arun District Council's Conservation Officer comments concluded that: - Whilst the report identifies the designated heritage assets in the local area, it fails to identify any of the non-designated heritage assets. - Arun District Council has a local list of non-designated heritage assets which consists of what it has termed Buildings or Structures of Character and Areas of Character. Both of these asset types are within a short distance of the site boundary. - It is also not clear why some listed buildings have been identified (in section 3 of the report), and others not. For instance, on Westergate street, three buildings are identified, when there are others in close proximity (such as Hop Garden Cottage). - Reference is made to both the Arun Local Plan 2011-31 and the NPPF, but it should also include references to the Planning Practice Guidance. Further, the settings of the assets should be considered in accordance with the relevant Historic England Guidance (Historic Environment Good Practice Advice in Planning: 3: The Setting of Heritage Assets). - Whilst table 10.1 is helpful for now, it reads as a general summary of the impact of the development upon the assets on an area/group basis, as opposed to on an individual asset basis. This, in turn affects the initial assessment of the impact of the development upon the individual assets. For instance, St George's Church (Grade II*), is assessed as part of the Church Lane Eastergate Conservation Area which also contains a number of Listed Buildings. Such an approach results in an overly generalised assessment of the impact, as opposed to one more specifically related to the individual assets such as the Grade II* Listed Building. It is suggested that a revised approach be considered so that the full impact on the different assets can be assessed and considered.	The assessment includes consideration of non-designated assets and sets out the rationale for identifying which assets have been included. Planning Practice Guidance has been applied to the assessment. The assessment considers potential impact on an area/group basis as well as on an individual asset basis.
The baseline for the Historic Built Environment Chapter shall follow the methodology guidelines of Industry (CIfA2014). The LPA requires built environment and archaeological data sets to be reviewed and considered into one document (the DBA) in forming the baseline conditions.	The assessment follows the specified industry guidance. A DBA supports Chapters I and J as a technical appendix.
The Chapter will be required to consider both built heritage assets and all others defined by both local and national guidance/policy (i.e. archaeological,	The assessment considers assets defined by local and national guidance.

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Scheduled Ancient Monuments and Conservation Areas).	
The Archaeology Chapter of the ES shall establish a baseline which will follow current West Sussex/East Sussex 'Industry Approved' Guidelines (2019 version) and appropriate industry (CIfA 2014) guidelines.	The baseline in the archaeology chapter follows industry approved guidance.
The baselines assessment and assessment of impacts shall take into account the document referred to in paragraphs 11.4 and 11.5 of the as part of the DBA approach. However, this should not be exclusive and additional records may be included as part of the assessment subject to confirmation by either the LPA or applicant.	The guidance and data sources set out in the scoping report have been considered for the preparation of the baseline assessment and assessment of impacts.
Socio-Economics	
The Environmental Statement shall include an assessment of the potential impacts of the Proposed Development on the recreational value of the area, together with impacts on the community living and working within the locality. This shall also be linked to the cumulative impacts section. ADC will require consideration to be given to impacts on healthcare and education within the District.	This approach has been adopted within the Socio-Economic assessment within Chapter G, and the cumulative impact assessment within Chapter N.
Climate Change and Resilience	
The Climate Change and Resilience Chapter of the ES shall establish a baseline based on the data set out in paragraph 14.3 of the submission. The applicants may wish to liaise with the LPA to ensure such an evidence base is robust and look at further data sets to assist completeness.	The assessment in Chapter M has been prepared with full consideration of recent developments on climate change including the declaration of climate change emergency by the UK Parliament last year. The chapter has outlined a number of proposed solutions to avoid, reduce or offset carbon emissions as well to strengthen the Proposed Development's resilience to a changing climate, thereby identifying a range of mitigation and adaptation measures respectively.
The subsequent methodology for assessing impact shall be based on the recommendations and best practice contained within the IEMA Principles Series: Climate Change Mitigation & EIA (2010), IEMA (2016) Environmental Impact Assessment Guide to: Delivering Quality Developments and IEMA Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating Their Significant (2017).	Best practice contained within the IEMA Principles and Guidance has been applied to the assessment.
The methodology shall fully take into account the legislative requirements as set out in paragraphs 14.4 and any successor to these at the time of submission. The methodology shall also consider the planning policies and guidance set out in paragraph 14.5 of the EIS Scoping submission.	The assessment takes account of the relevant legislation including the declaration of climate change emergency by the UK Parliament last year.

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The Chapter shall review the key anticipated CO2 emission sources for the Proposed Development, i.e. Embodied carbon in buildings (including fuel use in construction plant & associated facilities) during construction and shall adopt the fabric first approach to carbon reduction throughout the development. The Chapter shall also account for during construction and regulated/unregulated CO2 emissions from buildings during operation.	The assessment has reviewed anticipated CO2 emission sources for the Proposed Development including during construction and during operation.
Ecology	
ADC Ecologist has provided detailed comments which can be found on the EIS Scoping file. These comments include the general principles of what an ES should include: - Phase one habitat surveys and subsequent protected species surveys as required; - Mitigation strategies for any species found onsite; - Consideration and safeguarding of green infrastructure and connectivity across the site (hedgerow and tree connectivity); - Net Biodiversity Gain and how this will be achieved to meet the requirements of Policy ENV DM5; - Assessment of the direct and indirect impacts on protected sites; - Impacts from climate change and planning for the future	Points raised have been fully addressed in the Ecology Chapter.
Comments from Natural England: - Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website. - The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers. - The proposal is located outside of specific buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's	Points raised have been fully addressed in the Ecology Chapter.

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buffers for designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). - Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impacts of this would need to be considered in the Environmental Statement. - The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geo-conservation group or a local forum established for the purposes of identifying and selecting local sites. They are of country importance for wildlife or geodiversity. The ES should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. - The ES should assess the impact on all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment. - Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. - Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration... in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.	

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The above comments also refer to the importance of any assessments considering the potential cumulative effects of the proposal and in-combinations effects.	This approach has been adopted within the Ecology assessment within Chapter F, and the cumulative impact assessment within Chapter N.
The LPA will require that a habitat survey (equivalent to Phase 2) is carried out on the site in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	A Phase 2 Habitat Survey has been carried out and forms part of the Volume 2 Technical Appendices.
The Ecology Chapter in the ES shall therefore include an assessment of the likely impact on the wildlife and geodiversity interests of such sites. The assessment should include proposals and strategies for full mitigation of any impacts and if appropriate, compensation measures. Such measures shall relate to the scope set out in the EIS Scoping submission.	Points raised have been fully addressed in the Ecology Chapter.
The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the Natural England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006.	As outlined in the Ecology Chapter of the ES, detailed survey work has been undertaken to establish the current baseline at the site in respect of habitats and protected / notable species, including those included on the Section 41 list. Potential effects arising upon habitats and species as a result of the proposed development have been considered in detail, with mitigation proposed to ensure that adverse effects will be avoided, mitigated or offset.
The Chapter in the ES shall detail what measures and how these measures will allow the development to achieve at least 10% minimum biodiversity net gains. The applicants should seek to go beyond this mandatory minimum wherever possible, in accordance with Natural England best practice guidance. The mitigation hierarchy, as set out in paragraph 175 of the NPPF should be followed and firstly consider what existing environmental features on and around the site can be retained or enhanced and then what new features could be incorporated into the development proposal. The results from this shall be documented using the DEFRA Metric 2.0 calculator, to compare the ecological baseline with the proposed habitats post-development.	Given the level of detail of the Outline proposals, Biodiversity Net Gain (BNG) calculations have not been undertaken to date, on the basis that the assessment would be reliant on a series of assumptions to underpin the process, which in turn would only generate a very indicative calculation of the Development Site. Of note, given the paucity of the current baseline, and moreover the extent and diversity proposed within the site (particularly the Lidsey Rife corridor), the professional judgement of the Ecology lead anticipates that there will be a clear and demonstrable net gain. This is further discussed within the Ecology Chapter of the ES.
Nitrate neutrality: The LPA considers that the proposed approach set out in the Scoping Opinion does not fully take into account the in-combination impacts on the SPA from other nearby developments. Such an	As outlined in the Ecology Chapter, whilst the Lidsey Rife provides a hydrological connection between the site and the Solent and Dorset Coast SPA, this is not a European site which has been identified to be susceptible to potential adverse

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approach would not accord with the holistic approach which the EIA Regulations seek to consolidate. The LPA is aware of increasing nitrate levels accumulating from the west. Firstly this was experienced in the Solent SPA and has now become problematic in the Chichester Harbour SPA. Given the long build out period associated with this development, the ES should include a baseline position of the development as existing. This will allow for nitrate neutrality calculations to be undertaken should this more latterly be raised as an issue throughout the lifetime of the development. The LPA agrees that specific mitigation would not be required as part of the ES; however, baseline conditions should be identified and evidenced. This accords with the precautionary principle	effects arising due to nitrates. The site is not situated within the fluvial catchment of any of the Solent international sites (Solent Maritime SAC, Solent and Southampton Water SPA and Ramsar site, Portsmouth Harbour SPA and Ramsar site or Chichester and Langstone Harbours SPA and Ramsar site). Moreover, waste water from the site will not discharge into any watercourses which flow into these sites. On this basis, there is no potential pathway for an adverse effect to occur via nitrates to these designated sites, such that the completion of nitrate neutrality calculations is not required.
Transportation	
WSCC Highways provided the following comments: - At the start of the document, the CHA recommends that reference should be made early on to the overall build-out of circa 4,200 dwellings to cover the entire BEW allocation to cover both pre and post-Local Plan time frames. This will then give context to the development proposed. - Specifically with regard to the highway component of this Scoping Opinion (Section 5), this appears largely fit for purpose at this stage of the proposals. However, reference is made in this section to assessment cycling facilities (para 5.33), public transport (5.34) and road safety and collision data (5.35) using professional judgement. In response to this, the CHA would expect that where relevant, any applicable design standards, design guidance and best practice should also be referenced here.	This approach has been adopted within the Transport Assessment within Chapter D of the ES.
The Highways England provided comments relating to the following key points: - Any TA and EIA assessment should be undertaken in accordance with the DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development" - The TA should include a robust assessment of the vehicular impacts	This approach has been adopted within the Transport Assessment within Chapter D of the ES.

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“with” and “without” development for the horizon year (full occupation) and the end of the Local Plan period to examine the net impact of non-consented development - The EIA should demonstrate how it accords with the Design Manual for Roads and Bridges (DMRB) LA104 Environmental Assessment and Monitoring, and we note that the latter document is referenced in paragraphs 5.43 and 5.44 but not in paragraph 5.5 (Legislative and policy context) - The Scoping note should be agreed prior to commencement of the main transport study by both Highways England and West Sussex County Council as Strategic and Local Highways Authorities - We note that the Framework Masterplan included was up to 4,300 dwellings (a 1,300 dwelling increase on the previous proposal for 3,000 dwellings), where the EIA scoping report refers to 4,180, while the consultation refers to 1500 dwellings and thus clarification is required as such. - We have concerns about the implications of development traffic on the A27 Chichester Bypass. Of particular concern is the impact of the development site on the A27 Bognor Road Roundabout, and A27 Whyke Roundabout. Both junctions will need detailed consideration as part of the Transport Assessment. - The assessment of these junctions will also need to take into account Chichester District Council’s Local Plan proposals (plus committed development) and the agreed necessary junction mitigations on the A27 coupled with the cumulative impacts of Arun’s committed development that from its adopted Local Plan. It will be necessary to undertake the assessment at the end of both Local Plan periods which is currently 2031 as well as year of opening at full occupancy. - As the Chichester Local Plan mitigation schemes on the A27 Chichester Bypass only account for the impacts of Chichester’s own strategic development and deliver a ‘no worse’ than existing scenario on the highway network, it is highly unlikely that additional impacts	

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from strategic development at BEW can be accommodated without increasing the severity of congestion already encountered at these junctions. Accordingly, the Transport Assessment will need to consider appropriate highways mitigations at the A27 Bognor Road and Whyke junctions as well as measures targeted at reducing travel demand by car in favour of more sustainable transport modes. - Consideration will also need to be given to the development's impact at the other SRN junctions identified in Table 5.1, all of which were identified in the latest Arun Local Plan strategic modelling report (Systra's Enterprise Bognor Regis Transport Review of November 2017). This is considered key as the Systra Review was based upon 3,000 dwellings at BEW, where the Masterplan is now proposing 4,300 dwellings.	
The Transport Chapter of the ES should include reference to, but not exclusively, and any successor document relevant at the time of submission: - National Planning Policy Framework (NPPF) (June 2019); - National Planning Policy: Planning Practice Guidance (March 2014); - The Department for Transport's Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development; - National Planning Policy: The Strategic Road Network (SRN): Planning for the Future (2015); and - Local Planning Policy: Arun Local Plan (2012-2031)	Chapter D includes reference to these documents and their successors.
Paragraphs 5.15 – 5.18 demonstrate updated modelling that has been undertaken following this initial Local Plan ATS work. However, the submission is devoid of mention of the increase from 3,000 units to 4,300 units; an in-combination effect. Key to ensuring that both construction effects of the development can be evidenced properly is through having satisfaction of both the phasing of the wider BEW allocation. This phasing is reliant upon the delivery of the A29 which, dependent upon its delivery within the Phasing, will dictate	The approach set out in the Scoping Opinion has been adopted within the transport assessment within Chapter D, and the cumulative impact assessment within Chapter N. The housing is the outline part of application and is for up to 1,200 homes. Details are submitted for the full extent of the realigned A29 and the full build out of the site allocation has been considered to determine that the new road infrastructure through the allocated site can accommodate forecast year traffic volumes.

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when according parcels are delivered, and what the in-combination construction effects will be. ADC understand that the additional dwelling yield will be facilitated on land under the control of the Church Commissioners (the applicant of this Scoping Submission). As part of the EIA process it will be the responsibility of the applicant to demonstrate that the in-combination effects of this increased dwelling yield can be accommodated acceptably. This matter should be documented fully as part of the Transport Chapter of the ES. The LPA will require consideration to be given to the in-combination effects of the development over the total dwelling yield of 4,300 homes throughout this Plan period. The adoption of the Framework Masterplan would allow for delivery within this Local Plan period and the in-combination effects would need to consider this fully. The Transport Chapter should also consider other nearby committed development which will impact upon the junctions outlined in Table 5.1 of the submission. This will include cross-boundary working with neighbouring authorities including Chichester District Council to assess the in-combination effects of these junctions with committed development within their District. The submitted Transport Chapter shall include a section on phasing which will specifically outline the applicant's position on the delivery of the re-aligned A29. Then, using this as part of the baseline evidence, assessment scenarios for construction and operational phases of the development should then be undertaken. Should the eventuality arise whereby the re-aligned A29 is not delivered as part of an early phase and phasing of parcels should be staggered, then assessment scenarios for construction and operational phases should take into account. Ongoing discussions with both Highways England and WSCC Highways suggest that the transport mitigation package outlined in the ADC Apportionment Study will need substantial revision should the total dwelling yield of 4,300 be	The committed and planned developments (including local plan allocations) have all been included in the strategic traffic modelling. The requirements of the Transport Assessment, including cumulative impacts and junction assessment (including local plan junction mitigation schemes) was agreed as part of the scoping discussions and these have been included in the strategic and junction traffic modelling. Assessments have been undertaken for 2031 and 2038. The year of opening at full occupancy is likely to be sooner than 2038 and therefore assessing this forecast is considered to represent a robust analysis. The strategic and junction modelling has considered the operation of these junctions and further information is included in the Transport Assessment report.

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supported through endorsement of the Framework Masterplan.	
Items Falling Outside the Scope of the Environmental Statement:	
<i>Energy and Utilities</i>	
The LPA agree that there are no onerous infrastructure constraints associated with gas provision and there are no restrictions which are likely to create significant environmental effects. The LPA acknowledges that existing infrastructure is able to be designed around or diverted and upgraded where necessary. Water supply and drainage are matters falling with the Water Environment chapter of the ES. Subject to the above, Energy and Utilities can be scoped out.	Noted and agreed. Water supply and drainage is considered within the Water Environment ES Chapter.
<i>Health</i>	
It is expected that any potential health effects linked to the Proposed Development would be considered as part, and in the context, of the above chapters in the ES. Such chapters include noise, air quality and water resources. An assessment of the effect of the Proposed Development on health infrastructure and other local facilities (e.g. GPs, dentists and schools) would be included within the socio-economic ES chapter. The increased population may result in effects to the local population concerning the availability and capacity of public health services resulting from the introduction of additional residential properties which may increase demand for public health services. However, as noted above, these effects will be assessed as part of the socio-economics chapter. It is therefore considered that the likely effects on human health will be adequately assessed within other applicable	Noted and agreed. These matters are considered within the Socio-economics ES Chapter.
<i>Access, Recreation and Green Infrastructure</i>	
Access matters shall be addressed within the scope of the Transport and Accessibility Chapters of the ES. Recreation and Green Infrastructure will be considered in both the Socio-Economic	Noted and agreed. These matters are considered within the LVIA and Socio-economics ES Chapters.

Summary of Information from ADC Scoping Opinion (11.11.2020)	Response as part of the BEW Parcel SC1 ES (November 2021)
Chapters and Landscape and Visual Impact assessment. On the basis of the above, these topics will be adequately covered through the relevant sections in the ES. Therefore, a specific chapter on Access, Recreation and Green Infrastructure will not be required.	
Other Items Falling Outside of the Scope of the ES	
ADC consider that the following matters can remain scoped out of the ES for the reasons set out in the Scoping Report submission: - Agricultural Land - Waste - Risk of Major Accidents and Disasters - Daylight, Sunlight and Overshadowing - Wind Environment -	Noted and agreed.
Cumulative Impacts	
The ES should include an assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. To carry out the assessment of cumulative and in-combination effects, the following types of projects should be included (subject to availability of information): i) Existing completed projects ii) Approved but uncompleted projects iii) Plans or projects for which an application has been made and which are under consideration by the consenting authorities iv) Plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects	Chapter N has been prepared in accordance with this approach.
The LPA considers, in reference to (iv) above, that the entirety of the strategic allocation should be considered as part of the EIA based on the evidence available at the time of submission. The LPA requires this to be Scoped into the report when determining in-combination effects.	Chapter N has been prepared in accordance with this approach.
The main applications and proposals have been identified within the Scoping Report but any additional schemes that may arise after this Opinion is issued may also need to be added into the cumulative impacts.	The list of applications has been monitored since the submission of the Scoping Report, and an up to date list of applications is included within Chapter N showing which applications and proposals have been considered for the cumulative assessment.

B4.0 EIA Processes and Difficulties

- B4.1 The EIA has considered the likely environmental effects based on current knowledge of the application site and surroundings, desk top assessments, surveys and fieldwork and information available to the EIA team. Regard is given to relevant national, strategic and local planning policy and other legislation of relevance to individual topic areas. The topic-specific guidance is considered in further detail within individual chapters of the ES.
- B4.2 The EIA has been completed with reference to best practice and relevant legislation and has addressed all those matters that could reasonably be required to assess the likely significant effects of development. This includes those arising from the scheme itself as well as those temporary effects arising during the construction phase.
- B4.3 An extensive amount of the information has been available to establish the baseline position for the application site and for consultation and assessment of the likely impacts by the EIA team. The development of the design has emerged from an iterative process of assessment and development between the design and EIA team, also taking into account consultation responses.
- B4.4 The project for which planning permission is sought incorporates those revisions or modifications that are necessary or appropriate to avoid or minimise significant adverse effects on the environment. Where 'built in' mitigation is taken into account in the technical assessments, this is identified.
- B4.5 Following the Council's formal consultation on the planning application and associated ES, new issues may emerge, or practices identified which may affect the findings in this ES. Throughout the ES, the difficulties in compiling information and testing impacts or the assumptions that have been adopted are noted explicitly.
- B4.6 General difficulties relevant to this ES are as follows: -
- 1 The assessment is limited by the availability and reliability of the baseline information available at the time of assessment. No independent verification of the information presented in the baseline sources has been undertaken as part of this assessment. Furthermore, the baseline data for each aspect chapter may be subject to change over time, which could lead to the assessment being subject to statistical time lag.
 - 2 The ES is in part based on information provided by third parties (for instance baseline data). While the latest available data at the time of preparation has been used, it should be noted that many data sources are frequently updated and could be subject to change since the time of drafting or during the planning application process. Where any data from other sources have been used, it has been assumed that the information is correct.
 - 3 Information being unavailable to the team or the necessity to rely on reasonably available data in carrying out the EIA.
 - 4 Availability of accepted methodologies (e.g. there is no generally accepted criteria for assessing the significance of impacts on socioeconomics). In these situations, professional judgement, experience and agreement of other forms of assessment have been relied upon as the basis of EIA.
 - 5 The assessment of cumulative effects from the Proposed Development when considered with various other schemes in proximity to the site is only capable of being carried out based on information available at this time.
 - 6 Issues arising from the ongoing Covid19 pandemic in 2020/2021 which may have affected the ability to survey, ability to engage with key stakeholders, or visit locations. Where

specific issues are relevant to a particular technical aspect, these are identified in Chapters D to M of this ES and the measures taken to overcome these difficulties described.

B4.7 Where technical limitations and difficulties have arisen on individual topic areas, these are identified in each chapter as appropriate.

B5.0 Methodological Approach

General Approach

- B5.1 The EIA has been prepared in accordance with the requirements of the updated 2017 EIA Regulations (Ref 3) and with reference to best practice including that published by the Institute of Environmental Management and Assessment (“IEMA”). All information required to identify the likely significant environmental effects of the development, as defined by Schedule 4 of the updated 2017 EIA Regulations (Ref 3) has been provided as part of the ES. The ES also complies with the requirements of Regulation 18(3), 18(4) and 18(5) which contain requirements for environmental statements.
- B5.2 The purpose of the ES is to ensure that information on the environmental issues associated with the Proposed Development, and any mitigation or monitoring required to address adverse effects, is set out in a form to assist in decision making and for stakeholders. Consideration has been given to effects during the construction and operation of the Proposed Development and including:-
- 1 Construction – all works, activities and processes required in the demolition of structures, earthworks, preparatory works and the construction of infrastructure and buildings; and
 - 2 Operation – impacts arising during the operation and occupation of buildings within the site.
- B5.3 The potential environmental effects have been assessed for each relevant aspect by comparing the existing and likely future environmental conditions (in the absence of the Proposed Development) with the conditions that would exist if the Proposed Development is brought forward. The ES has been informed by desk studies, surveys, consultation and other investigations as recorded in Chapters D to M of this ES.
- B5.4 Due to the nature and form of the Proposed Development, which has an anticipated lifetime beyond 100 years, decommissioning effects are not relevant and have not been considered as part of this EIA.

Proposed Development Assessed

- B5.5 The development assessed (comprising both access points into the application site designed in detail and also other outline elements) is described in Chapter C of this ES. Chapter C also describes the establishment of a series of maximum parameters that have been established to allow a worst-case scenario assessment to be conducted.

Assessment During Construction

- B5.6 The EIA has assessed construction effects based on an assumed construction period, key assessment years, and an indicative phasing plan and phasing details. This information is described within the Construction Methodology set out in Chapter C of this ES. The full suite of construction information provided has not been used for every technical assessment of construction effects due to differences in methodology and relevance of information to each assessment. How each technical chapter has approached the assessment of construction phase effects is set out in Chapters D to M.

Embedded Mitigation

- B5.7 As EIA is an iterative process intended to inform the development of the Proposed Development’s design, certain mitigation measures which will reduce potentially significant

effects have been built in or 'embedded' into the design. Chapters D to M of this ES identify specific embedded mitigation measures arising in relation to the assessment of each particular technical aspect.

- B5.8 Best practice measures for mitigation will be followed when considering the methods for dealing with the environmental impacts of the Proposed Development. In addition to this, and where relevant, the EIA has also sought to identify opportunities for environmental enhancement.

Assessment of Effects

- B5.9 The updated 2017 EIA Regulations (Ref 3) require the identification of the likely adverse or beneficial significant environmental effects of the Proposed Development. This is based on a consideration of the magnitude of the predicted impacts and the sensitivity of the affected receptor. The process by which effects have been identified and their significance assessed is set out in each technical aspect in Chapters D to M of this ES. However, a general description is provided below.

- B5.10 Certain topics have deviated from the standard methodological approach and structure of assessment in order to adhere to relevant industry guidance and practice. Where this is relevant, explanation is provided in Section 3 of the relevant chapter.

- B5.11 The ES includes a clear description of the likely significant environmental effects on the environment including direct/indirect effects, secondary, cumulative, short/medium/long term, permanent/temporary and beneficial/adverse effects arising from the development. In particular, the assessment of impacts has had regard to the following:-

- The magnitude of the impact (i.e. its extent, duration, frequency and severity);
- The sensitivity of a particular receptor to a given impact (i.e. including its adaptability or the degree to which it can avoid or adapt to an impact; how tolerant it is to accommodate a particular impact; how it can recover following an impact; and how valuable, rare or important a receptor may be); and
- The probability or likelihood that an identified impact might occur (adopting a precautionary or worst case approach where necessary).

- B5.12 The identified effects have then been classified by reference to a common list of EIA significance criteria, comprising:-

- 1 Major/Substantial¹ beneficial
- 2 Moderate² beneficial
- 3 Minor³ beneficial
- 4 Negligible
- 5 Minor³ adverse
- 6 Moderate² adverse
- 7 Major/Substantial¹ adverse

- B5.13 Each technical chapter D to M relates the above criteria to its own specific methodological assessment approach and provides a clear statement on which effects are considered 'significant'

¹ Major/Substantial - considerable effects (by extent, duration or magnitude) or of more than local significance or breaching identified standards or policy

² Moderate - limited effects which may be considered significant

³ Minor - slight, very short or highly localised effects

in EIA terms. Generally, impacts identified as major/substantial or moderate are considered significant. However where a particular aspect deviates from this, this is stated.

B5.14 Predictions of impact are based on the best available data using a combination of professional judgement, expert knowledge and modelling where needed. Assumptions or limitations made in the assessment are specifically noted in Chapters D to M; this includes an explanation of any strategies taken to address known limitations.

B5.15 Mitigation measures that are identified within specific ES Chapters, and the mechanisms for monitoring their effectiveness, are consolidated and set out in a coordinated manner in a dedicated Chapter within the ES (Chapter O). This is provided to assist ADC in forming its reasoned conclusion on the planning application for BEW Parcel SC1.

Structure of Technical Assessments

B5.16 The assessment includes a consideration of relevant policy and legislation as well as comments received by consultees during the pre-submission period.

B5.17 Each technical assessment follows a consistent approach and format: -

- 1 Brief review of relevant policy and legislative context;
- 2 Confirmation of the detailed topic specific assessment methodology, consultation undertaken and confirmation on how the assessment relates to the standard significance criteria adopted for the EIA (see below);
- 3 Consideration of Baseline Conditions including an identification of sources of information, site history, current environmental conditions and future trends/anticipated changes to current conditions that could be anticipated without the scheme;
- 4 Identification of the potential effects including a summary of those resources/receptors likely to be affected, the sensitivity of those receptors to accommodate change; the degree of change resulting from the Proposed Development; the change of events or pathways linking cause to effect and a prediction of the significance of effects in terms of nature, extent and magnitude including whether it is direct/indirect, short/long term, permanent/temporary, beneficial/adverse;
- 5 The scope for incorporating mitigation measures to avoid, reduce, remedy or compensate for any identified effects;
- 6 Identification of any effects remaining after mitigation; and
- 7 Consideration of the Strategic Allocation - considered and assessed as a distinct scenario in each individual chapter, based on the Framework Masterplan, to ensure that the effects from the entire allocation are clear from the Proposed Development. This part of the assessment has been provided for contextual information to support each technical Chapter.

B5.18 The cumulative effects which could arise out of the Proposed Development when considered as part of the wider Barnham, Eastergate and Westergate (BEW) Strategic Allocation (as described in Chapter A of this ES) as well as alongside other developments within the wider area are described in Chapter N of this ES. A summary is also provided in Chapter N of any effects which may occur due to the inter-relationship between different impacts arising from the Proposed Development (or 'synergistic effects').

B6.0 Consultation and Engagement

- B6.1 In accordance with the National Planning Policy Framework (Section 3) these proposals have been subject to engagement and discussions with the Council and local community prior to the submission of the planning application. This consultation has influenced the emerging design proposals and informed the application.
- B6.2 Detailed engagement with key stakeholders with the ability to inform the process of EIA has been undertaken in the context of each technical area and is described in Chapters D to M of this ES. This section outlines how consultation has also influenced the form of development alongside the process of EIA as part of an iterative process.

Engagement with ADC and other Key Stakeholders

- B6.3 The Proposed Development has been the subject of a constructive, inclusive and responsive pre-application design and development process since February 2020. Details of the process are also provided within a Statement of Community Involvement ('SCI') which has been submitted in support of the planning application to assist ADC in its consideration of the Proposed Development.

Framework Masterplan

- B6.4 The process of engagement with ADC began with the preparation of the Framework Masterplan. This has involved a series of pre-application meetings which began in February 2020 (detailed in Table B3.1).
- B6.5 A series of pre-application planning meetings took place between February 2020 and August 2020. These covered a range of departments and disciplines, focusing on different masterplanning, design, placemaking, highways and other issues relating to the design principles for the Barnham, Eastergate and Westergate (BEW) Strategic Allocation.
- B6.6 Meetings/correspondence has also taken with the following key stakeholders and statutory consultees:
- 1 West Sussex County Council (education)
 - 2 West Sussex County Council (highways)
 - 3 Coastal West Sussex Clinical Commissioning Group
 - 4 Environment Agency
 - 5 Southern Water
 - 6 Highways England
 - 7 St Phillip Howard Catholic School
 - 8 Eastergate Primary School
- B6.7 The feedback from these pre-application discussions has informed the design principles that are set out in the Barnham, Eastergate and Westergate (BEW) Framework Masterplan, which have informed the design of the Proposed Development.

Barnham, Eastergate and Westergate (BEW) Planning Application

- B6.8 A series of pre-application meetings were also held in relation to the proposals for the Barnham, Eastergate and Westergate (BEW) outline application (see Table B3.1). These covered different

issues relating to the application material, design principles of the Proposed Development, parameter plans and phasing.

- B6.9 In addition, an Advisory Group has been set up by ADC to provide local Councillors and key stakeholders with a forum to discuss the emerging proposals for the Site Allocation. This group comprised of the following members: Councillors and Officers from ADC and West Sussex County Council, Barnham and Eastergate Parish Council, Aldingbourne Parish Council and Walberton Parish Council. The other landowners within the Site Allocation are also part of the group along with statutory consultees such as the NHS, Network Rail, Southern Water, Highways England and Sport England.

Community consultation

- B6.10 Community consultation was carried out:

- To raise awareness of local residents, members of the public, and other stakeholders in relation to the Proposed Development before the planning application is submitted, through an inclusive, accessible and transparent process;
- To understand local aspirations and key issues with regard to the application site and surrounding area; and
- To understand any key issues with the proposals, and communicate throughout the design development stage where feedback has influenced the proposals, and to use this feedback where it has identified concerns and opportunities to feed into, where necessary, the assessment process (including the EIA).

- B6.11 This public engagement took place in the following formats:

- 1 **Framework Masterplan:** A public consultation took place over a three-week period, between 5th and 26th August 2020. Due to social distancing requirements, a website was prepared which provided details on the proposals and an opportunity for people to send comments electronically via an online form or via email. A leaflet drop to approximately 4,000 households was carried out ahead of the consultation. In addition, Barnham and Eastergate Parish Council provided a link to the consultation on their own website. A Facebook page directing people to the website was also provided by The Southern Consortium. Hard copies of the website material were made available at Eastergate Hall. A notice was included in the online version of the Bognor Regis Post between 12th and 26th August at the top of their website which directed people to the consultation website.
- 2 **Outline planning application:** A public consultation took place between 19th April and 16th May 2021, which was subsequently extended until 24th May 2021 (five weeks in total). Due to Covid-19 and taking into account the latest Government guidance at the time, a website was prepared which provided details on the proposals and explained how feedback could be provided. A leaflet was issued to residents within the catchment used for the Framework Masterplan consultation (approximately 4,000 households) ahead of the public consultation. During the course of the consultation, Lichfieds was informed that some residents had not received the leaflet and so arranged for a further leaflet drop to these households and extended the consultation period as a result. The leaflet provided details of who to contact if a hard copy of the consultation material was required

- B6.12 During the pre-application engagement, presentations were also given to local councillors, parishes, the local community, local stakeholder groups and forums.

- B6.13 More detailed information on the consultation process and how the consultation comments were incorporated into the design is provided within Statement of Community Involvement submitted in support of the planning application.

B7.0

Abbreviations & Definitions

1	ADC	Arun District Council
2	AQMA	Air Quality Management Area
3	BEW	Barnham, Eastergate and Westergate
4	CDC	Chichester District Council
5	CEMP	Construction Environmental Management Plan
6	CIEEM	Chartered Institute of Ecology and Environmental Management
7	DAS	Design and Access Statement
8	DoD	Description of Development
9	EA	Environment Agency
10	EIA	Environmental Impact Assessment
11	ES	Environmental Statement
12	EU	European Union
13	FRA	Flood Risk Assessment
14	IEMA	Institute of Environmental Management and Assessment
15	LLFA	Lead Local Flood Authority
16	LPA	Local Planning Authority
17	LVIA	Landscape and Visual Impact Assessment
18	NE	Natural England
19	NVZ	Nitrate Vulnerable Zone
20	PRoW	Public Right of Way
21	SAC	Special Area of Conservation
22	SPA	Special Protection Area
23	SPZ	Source Protection Zone
24	TA	Transport Assessment
25	UK	United Kingdom
26	VVM	Verified Visual Montage
27	WSSC	West Sussex County Council

B8.0

References

- 1 EU Directive No 2014/52/EU
- 2 EU Directive No 85/337/EEC
- 3 Town and Country Planning (EIA) Regulations 2017
- 4 Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018
- 5 Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018
- 6 Town and Country Planning (Development Management Procedure, Listed Buildings and Environmental Impact Assessment) (England) (Coronavirus) (Amendment) Regulations 2020
- 7 Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011
- 8 EIA Planning Practice Guidance (March 2019)
- 9 Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition)
- 10 Arun Strategic Surface Water Management Study (October 2016)
- 11 CIEEM Guidelines for Ecological Impact Assessment (EcIA) (CIEEM, 2018)
- 12 Natural Environment and Rural Communities (NERC) Act 2006