

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

Environmental Statement Addendum

December 2023

The Southern Consortium (C.C. Projects, Ashmarden Limited and
Hanbury (PM) Limited)

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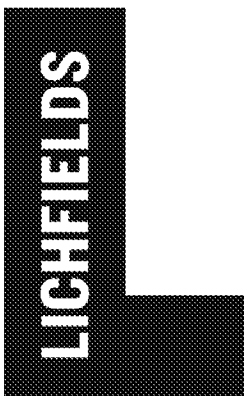
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1.0 Introduction and Purpose

- 1.1 This Environmental Statement Addendum ('ES Addendum (December 2023)') has been submitted on behalf of the Southern Consortium, consisting of C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited, together the 'Applicants'. It provides further information in relation to the Land at Barnham, Eastgate and Westgate (BEW Parcel SC) Environmental Statement ('the ES (January 2022)'). The ES (January 2022) relates to residential-led development (the 'Proposed Development') on land forming the northern section of the Barnham, Eastergate and Westergate Strategic Allocation (being BEW Parcel SC1) within the adopted Arun District Council ('ADC') Local Plan (here on referred to as the 'Application Site').
- 1.2 The ES (January 2022) accompanied an outline planning application (with all matters reserved except for the A29 realignment) submitted to ADC (ref. BN/11/22/OUT) and which was validated on the 4 February 2022. This ES Addendum (December 2023) should be read in conjunction with the ES (January 2022).
- 1.3 Following the submission of the ES (January 2022), a number of comments have been received from statutory and non-statutory consultees, some of which have requested the provision of further environmental information in order to assess the Proposed Development. This ES Addendum (December 2023) provides a response to relevant requests made in relation to the ES (January 2022) and, where required, either provides this information or identifies why additional information is not required. Tables 1.1 and 1.2 below describe the information scoped into this ES Addendum (December 2023) and its relationship to the ES (January 2022).
- 1.4 No formal request pursuant to Regulation 25 of the 2017 EIA Regulations (ref 1) has been issued by ADC in relation to the ES (January 2022). However, this document has been prepared and should be considered pursuant to Regulation 25.
- 1.5 In addition to this, a number of representations have been made in relation to the planning application, but these relate to planning issues and have no bearing on the assessment contained in or conclusions of the ES. These representations are therefore not considered as part of this ES Addendum (December 2023).

The Application Site and Proposed Development

- 1.6 The Application Site red line boundary, identified on the plan at Appendix A1 of the ES (January 2022), has been updated to include additional land to provide for a flood compensation scheme, located on the western banks of the Lidsey Rife. Further commentary on this is provided at paragraph 1.8 and within Section 3. An updated red line boundary is at **Appendix 1** of this ES Addendum (December 2023). This increases the Application Site area by 1.89ha to 94.5ha
- 1.7 No significant updates have been made to the proposals as presented within Chapter C of the ES (January 2022). As such, the description of development remains the same as presented within the ES (January 2022), and is repeated below for information:

“Outline planning permission (with all matters reserved except for the A29 realignment) for the demolition of existing structures and mixed use development to provide residential dwellings (Use Class C3), care home/senior living accommodation (Use Classes C2/C3), flexible retail and community floorspace (Use Classes E/F2/sui generis), a primary school, plus associated open space, landscaping, drainage and all other associated ancillary works; and realignment of the A29 and early connection to existing A29, including construction of a new road carriageway, junctions and associated infrastructure.”

1.8 However, several minor changes to the Proposed Development have been made in response to representations received during the determination period and the effects of these changes are considered in this ES Addendum (December 2023). These are set out below.

- 1 Following discussions with the EA during the determination period, the application plans have been amended to include an area of floodplain compensation where the Lidsey Rife floodplain is impacted by the proposed A29 crossing. It is estimated that 2,643m³ of compensation would be displaced as a result of the bridge approach embankments being partially located within the floodplain. The compensation feasibility drawing at Appendix 6 of the updated FRA (ES Addendum (December 2023) Appendix 6 – Updated Flood Risk Assessment) shows that 2,768m³ of compensation could be provided on the western banks of the Lidsey Rife i.e., a net increase in floodplain volume. This additional site area is included within the Applicant’s wider land holding. A small amendment to the Application Site red line boundary has been made to accommodate this. This approach allows the flood compensation scheme to be included within the proposals as part and parcel of the scheme, and has been discussed and agreed with ADC.
- 2 The detailed access drawings (ES January 2022 Appendix C1) have been updated in response to WSCC Highways comments, as set out in Table 1.1 and **Appendix 2**. For completeness, Table 1.1 includes the complete set of the Approved Drawings: WSCC Approved Submission. However, the table also makes a distinction between those Planning Submission Drawings for Approval and other supporting documents.

Table 1.1 Updated Access Drawings

Drawing Title	Drawing Number	Revision Number (as per Jan 2022 ES)	Revision Number of replacement drawing
Planning Submission Drawings – A29 General Arrangements for Approval			
Masterplan Highway Corridor including Junctions	A13394-PF-ZZ-XX-DR-CD-00001	P05 (10.01.22)	P09 (19.09.23)
A29 Link Road General Arrangement Sheet 1 of 10	A13394-PF-ZZ-XX-DR-CD-00100	P06 (10.01.22)	P010 (19.09.23)
A29 Link Road General Arrangement Sheet 2 of 10	A13394-PF-ZZ-XX-DR-CD-00101	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 3 of 10	A13394-PF-ZZ-XX-DR-CD-00102	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 4 of 10	A13394-PF-ZZ-XX-DR-CD-00103	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 5 of 10	A13394-PF-ZZ-XX-DR-CD-00104	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 6 of 10	A13394-PF-ZZ-XX-DR-CD-00105	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 7 of 10	A13394-PF-ZZ-XX-DR-CD-00106	P06 (10.01.22)	P09 (12.05.23)
A29 Link Road General Arrangement Sheet 8 of 10	A13394-PF-ZZ-XX-DR-CD-00107	P06 (10.01.22)	P10 (12.05.23)
A29 Link Road General Arrangement Sheet 9 of 10	A13394-PF-ZZ-XX-DR-CD-00108	P03 (10.01.22)	P06 (12.05.23)
A29 Link Road General Arrangement Sheet 10 of 10	A13394-PF-ZZ-XX-DR-CD-00109	P03 (10.01.22)	P06 (12.05.23)
A29 Level Principles for Approval			
A29 Link Road Earthworks and Construction Extents Sheet 1 of 8	A13394-PF-ZZ-XX-DR-CD-00400	P05 (10.01.22)	P09 (19.09.23)
A29 Link Road Earthworks and Construction Extents Sheet 2 of 8	A13394-PF-ZZ-XX-DR-CD-00401	P05 (10.01.22)	P08 (12.05.23)
A29 Link Road Earthworks and	A13394-PF-ZZ-XX-DR-CD-00402	P05 (10.01.22)	P08 (12.05.23)

Construction Extents Sheet 3 of 8			
A29 Link Road Earthworks and Construction Extents Sheet 4 of 8	A13394-PF-ZZ-XX-DR- CD-00403	P05 (10.01.22)	P08 (12.05.23)
A29 Link Road Earthworks and Construction Extents Sheet 5 of 8	A13394-PF-ZZ-XX-DR- CD-00404	P05 (10.01.22)	P08 (12.05.23)
A29 Link Road Earthworks and Construction Extents Sheet 6 of 8	A13394-PF-ZZ-XX-DR- CD-00405	P05 (10.01.22)	P08 (12.05.23)
A29 Link Road Earthworks and Construction Extents Sheet 7 of 8	A13394-PF-ZZ-XX-DR- CD-00406	P05 (10.01.22)	P08 (12.05.23)
A29 Link Road Earthworks and Construction Extents Sheet 8 of 8	A13394-PF-ZZ-XX-DR- CD-00407	P05 (10.01.22)	P08 (12.05.23)
Lighting Contours for Approval			
A29 Link Road Street Lighting and Lighting Contours Design	A13394-PF-ZZ-XX-DR- CD-00600	P03 (10.01.22)	n/a
A29 Link Road Street Lighting and Lighting Contours Design	A13394-PF-ZZ-XX-DR- CD-00601	P03 (10.01.22)	n/a
A29 Link Road Street Lighting and Lighting Contours Design	A13394-PF-ZZ-XX-DR- CD-00602	P03 (10.01.22)	n/a
Tree Plans – Supporting Documents			
A29 Link Road Tree Constraints Plan Sheet 1 of 13	A13394-PF-ZZ-XX-DR- CD-00100	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 2 of 13	A13394-PF-ZZ-XX-DR- CD-00101	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 3 of 13	A13394-PF-ZZ-XX-DR- CD-00102	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 4 of 13	A13394-PF-ZZ-XX-DR- CD-00103	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 5 of 13	A13394-PF-ZZ-XX-DR- CD-00104	P03 (10.01.22)	n/a

A29 Link Road Tree Constraints Plan Sheet 6 of 13	A13394-PF-ZZ-XX-DR-CD-00105	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 7 of 13	A13394-PF-ZZ-XX-DR-CD-00106	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 8 of 13	A13394-PF-ZZ-XX-DR-CD-00107	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 9 of 13	A13394-PF-ZZ-XX-DR-CD-00108	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 10 of 13	A13394-PF-ZZ-XX-DR-CD-00109	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 11 of 13	A13394-PF-ZZ-XX-DR-CD-00110	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 12 of 13	A13394-PF-ZZ-XX-DR-CD-00111	P03 (10.01.22)	n/a
A29 Link Road Tree Constraints Plan Sheet 13 of 13	A13394-PF-ZZ-XX-DR-CD-00112	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 1 of 12	A13394-PF-ZZ-XX-DR-CD-00113	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 2 of 12	A13394-PF-ZZ-XX-DR-CD-00114	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 3 of 12	A13394-PF-ZZ-XX-DR-CD-00115	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 4 of 12	A13394-PF-ZZ-XX-DR-CD-00116	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 5 of 12	A13394-PF-ZZ-XX-DR-CD-00117	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 6 of 12	A13394-PF-ZZ-XX-DR-CD-00118	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 7 of 12	A13394-PF-ZZ-XX-DR-CD-00119	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 8 of 12	A13394-PF-ZZ-XX-DR-CD-00120	P03 (10.01.22)	n/a

A29 Link Road Tree Removal and Retention Plan Sheet 9 of 12	A13394-PF-ZZ-XX-DR-CD-00121	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 10 of 12	A13394-PF-ZZ-XX-DR-CD-00122	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 11 of 12	A13394-PF-ZZ-XX-DR-CD-00123	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan Sheet 12 of 12	A13394-PF-ZZ-XX-DR-CD-00124	P03 (10.01.22)	n/a
A29 Link Road Tree Removal and Retention Plan	A13394-PF-ZZ-XX-DR-CD-00125	P03 (10.01.22)	n/a
Issued as part of Design Summary Document (alongside Planning Submission) – All Supporting Documents			
Scheme Overview	A29 Full Layout	D (14.02.22)	H (12.05.23)
A29 Link Road A29-4 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00500	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road A29-5 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00501	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road A29-9 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00502	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road A29-11 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00503	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road A29-13 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00504	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road A29-14 Roundabout Audit	A13394-PF-ZZ-XX-DR-CD-00505	P04 (10.01.22)	P07 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 1 of 10	A13394-PEF-ZZ-XX-DR-CD-00501	P08 (13.01.22)	P11 (21.09.23)
A29 Link Road Highway Drainage Layout Sheet 2 of 10	A13394-PEF-ZZ-XX-DR-CD-00502	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 3 of 10	A13394-PEF-ZZ-XX-DR-CD-00503	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 4 of 10	A13394-PEF-ZZ-XX-DR-CD-00504	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 5 of 10	A13394-PEF-ZZ-XX-DR-CD-00505	P08 (13.01.22)	P10 (12.05.23)

A29 Link Road Highway Drainage Layout Sheet 6 of 10	A13394-PEF-ZZ-XX-DR-CD-00506	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 7 of 10	A13394-PEF-ZZ-XX-DR-CD-00507	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 8 of 10	A13394-PEF-ZZ-XX-DR-CD-00508	P08 (13.01.22)	P10 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 9 of 10	A13394-PEF-ZZ-XX-DR-CD-00509	P08 (13.01.22)	P11 (12.05.23)
A29 Link Road Highway Drainage Layout Sheet 10 of 10	A13394-PEF-ZZ-XX-DR-CD-00510	P08 (13.01.22)	P10 (12.05.23)
A29 Geometry Standards	A13394-SK030		B (October 2021)
General Arrangement Single Span Bridge (NR)	A13394-PEF-ZZ-XX-M2-S-000001	P04 (14.01.22)	P08 (11.05.23)
Initial Bridge Options 30m Single Span Frame Abutment	A13394-PEF-ZZ-XX-M2-S-000003	P04 (14.01.22)	P07 (12.05.23)
Post planning drawing Issue – All Supporting Documents			
Swept Path Analysis Refuse Vehicle [insets 1-6]	A13394-PF-ZZ-TR-DR-CD-00001	-	P00 (March 2022)
Swept Path Analysis Refuse Vehicle [insets 7-13]	A13394-PF-ZZ-TR-DR-CD-00002	-	P00 (March 2022)
Lidsey Farm/Lidsey Caravan Park Swept Path Analysis	A13394-PF-ZZ-SK-DR-CD-00004	P00 (25.10.22)	P02 (12.05.22)
Hanbury Link Existing Landfill and Summer Barn Swept Path Analysis	A13394-PF-ZZ-SK-DR-CD-00005	P00 (25.10.22)	P02 (12.05.22)
Lidsey Farm Existing Manoeuvres Swept Path Analysis	A13394-PF-ZZ-SK-DR-CD-00006	P00 (31.10.22)	P02 (12.05.22)
BEW Development Masterplan Railway Crossing Review	A13394-PF-ZZ-SK-DR-CD-00007	P00 (31.03.23)	P01 (12.05.22)

Main A29 Route Junction Access Swept Path Analysis	A13394-PF-ZZ-SK-DR-CD-00008		P01 (19.09.23)
A29 Link Road A29-4 Roundabout Swept Path Analysis	A13394-PF-ZZ-XX-DR-CD-00700	P00 (20.06.22)	P02 (12.05.22)
A29 Link Road A29-5 Roundabout Swept Path Analysis	A13394-PF-ZZ-XX-DR-CD-00701	P00 (26.07.22)	P02 (12.05.22)
A29 Link Road A29-9 Roundabout Swept Path Analysis	A13394-PF-ZZ-XX-DR-CD-00702	P00 (26.07.22)	P02 (12.05.22)
A29 Link Road A29-11 Roundabout Swept Path Analysis	A13394-PF-ZZ-XX-DR-CD-00703	P00 (26.07.22)	P02 (12.05.22)
A29 Link Road A29-13 Roundabout Swept Path Analysis	A13394-PF-ZZ-XX-DR-CD-00704	P00 (26.07.22)	P02 (12.05.22)
Hanbury Link Road Lidsey Road Roundabout tracking	A13394-PF-ZZ-XX-DR-CD-00705	P00 (26.07.22)	P02 (12.05.22)
Proposed TRO Changes on existing Lidsey Road as part of new A29 Alignment	A13394-SK035	P00 (08.09.22)	P03 (12.05.22)
Southern Water Access Swept Path Analysis	A13394-SK036	P00 (12.12.22)	P01 (12.05.22)
Existing A29 Visibility Splays	A13394-SK043		P01 (12.05.23)
Departure From Standards Drawings – All Supporting Documents			
Departure from Standard Form 1	A13394-PF-ZZ-SK-DR-CD-01000		P00 (23.06.23)
Departure from Standard Form 2	A13394-PF-ZZ-SK-DR-CD-01001	P00 (23.06.23)	P01 (17.07.23)
Departure from Standard Form 3	A13394-PF-ZZ-SK-DR-CD-01002		P00 (23.06.23)
Departure from Standard Form 4	A13394-PF-ZZ-SK-DR-CD-01003		P00 (23.06.23)
Departure from Standard Form 6	A13394-PF-ZZ-SK-DR-CD-01004	P00 (23.06.23)	P01 (17.07.23)
Departure from Standard Form 5	A13394-PF-ZZ-SK-DR-CD-01005		P00 (23.06.23)

Departure from Standard Form 7	A13394-PF-ZZ-SK-DR-CD-01006		P00 (17.07.23)
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The above listed revised access drawings include the following amendments to the detailed design of the A29:

- a Updated proposals to align with the Barnham Road Roundabout being delivered by WSCC;
 - b Narrowing of road carriageway to 6.75m, reducing to 6.5m at signalised crossings;
 - c Independent uncontrolled crossings now include 3m wide central island;
 - d Cycleways changed to two-way both sides of the carriageway with width increased to 3m each side of the road in line with LTN 1/20;
 - e Cycleway provision onto the carriageway introduced at Barnham Roundabout and Lidsey Road Roundabout;
 - f On both the bridge over the railway line and the bridge over the Lidsey Rife, verge increased to allow for potential highway widening in the future to 7.3m;
 - g Two lane exits from roundabouts reduced to single lane exits.
 - h Removal of left-in, left-out ('li-lo') side road junctions and replacement with ghost island junctions removing central barrier;
 - i Side road priority changed to cycle priority (in accordance with LTN 1/20);
 - j Alterations to 'Green Link' (upgrading the existing Public Right of Way) on the northern side of Hanbury Link Roundabout to clarify that the scheme does not include privately owned land;
 - k Changes to the location of controlled and uncontrolled crossings, especially around approaches to intermediate roundabouts;
 - l Proposed Southern Water access enlarged in line with Southern Water's proposed improvements to existing facilities;
 - m Changes to proposed works on Lidsey Road including to reflect the agreed 40mph design speed;
- 3 As a result of the updates to the Access Drawings, the following drawings and design documents have also been updated, which can be found at **Appendix 3**.

Table 1.2 Other Updated Drawings and Design Documents – For Approval

Drawing/Design Document Title	Drawing Number/Reference	Revision (as per Jan 2022 ES)	Revision of replacement drawing
Land Use Parameter Plan	00605B_PP01	ES January 2022 Appendix C1 P1	ES Addendum (December 2023) Appendix 3 P2
Building Heights Parameter Plan	00605B_PP03	ES January 2022 Appendix C1 P1	ES Addendum (December 2023) Appendix 3 P2

Drawing/Design Document Title	Drawing Number/Reference	Revision (as per Jan 2022 ES)	Revision of replacement drawing
Landscape and Green Infrastructure Parameter Plan	00605B_PP04	ES January 2022 Appendix C1 P1	ES Addendum (December 2023) Appendix 3 P2
Access and Movement Parameter Plan	00605B_PP07	ES January 2022 Appendix C1 P1	ES Addendum (December 2023) Appendix 3 P3
Development Areas Parameter Plan	00605B_PP05	ES January 2022 Appendix C1 P1	ES Addendum (December 2023) Appendix 3 P2

Review of Statutory Consultee Comments

- 1.9 The table below provides a summary of the statutory and non-statutory consultee representations received of relevance to the ES (January 2022); noting which require a response within this ES Addendum (December 2023). Representations received which do not relate to the ES (January 2022), or simply outline that the consultee has no objection, have not been included.
- 1.10 An informal response to all planning and technical statutory consultee comments was submitted to ADC on 15 July 2022 to provide an interim update to the outstanding planning and EIA issues to the case officer. This ES Addendum (December 2023) formally updates the information contained in the ES (January 2022).

Table 1.3 Review of relevant statutory consultee comments received since the submission of the ES (January 2022)

Consultee	Summary of comments received in response to the ES (January 2022)	Response to comments within the ES Addendum (December 2023)
WSCC Highways	WSCC Highways has issued seven rounds of comments on the transport modelling and design of the realigned A29. (1) 7 April 2022: WSCC requested justification of the design speed of 30 miles per hour; confirmation of no departure from design standards; further information on the design of crossing points, arrangement of the pedestrian and cycle link beneath the bridge structure, bridge design and junction designs along the A29 realignment; and clarification on the modelling. WSCC sought clarification on how the other land parcels within the allocation had been accounted for in the highways modelling and also requested	Responses to these comments are provided in Section 2 (Transport) below.

	modelling for the opening year and interim/intermediate years of development. (2) 10 May 2022: Further clarification was sought on the detailed design of the A29 realignment regarding the design of cycle lanes, roundabouts, crossing points and the relationship of the proposed southern tie-in with the existing A29 and an adjacent industrial unit. (3) 20 October 2022: Further clarification on the departures from standard and/or relaxations at both southern tie-in and Hanbury Link tie-in and the types of crossings and locations were sought. (4) 9 & 15 November 2022: Further clarification on set-back of crossings, cycle routes, new Stage 1 RSA required for cycleway, speed surveys were sought. (5) 23 November 2022: Further clarification sought on circulatory carriageway widths for internal roundabouts and roundabout geometry. (6 & 7) 28 March & 12 April 2023: Further clarification sought on set-back of crossings, cycle tie-ins, Lidsey Rife bridge, visibility splay at Lidsey Farm Roundabout, street lighting and cycle routes.	
National Highways	National Highways sought clarification on details within the Transport Assessment (ES January 2022 Appendix D1) on trip generation, trip distribution and traffic modelling, reserving comment on technical matters until these matters are addressed. Pell Frischmann responded on these matters. The details of these responses are contained in Table 2.1 below. Based on the latest NH response, it is considered that the NH comments have been addressed, and the Client is only awaiting a revised list of proposed conditions from NH.	Responses to these comments are provided in Section 2 (Transport) below.
Environment Agency	The Environment Agency provided an initial response to the application dated 28 March 2022. The comments referred to taking account of the latest climate change allowances within the Flood Risk Assessment and the need for floodplain compensation measures associated with the crossing over the Lidsey Rife. A second response, dated 28 November 2022 reiterated the concerns over the impact on the floodplain from the proposed Lidsey Rife crossing of	Responses to these comments are provided in Section 3 (Water Environment) below.

	the A29. Comments related specifically to the need for further assessment and a peer review of the hydraulic model. Pell Frischmann undertook consultation with the Environment Agency from March 2022 to November 2023. This work included a peer review of the hydraulic model, carried out by a team at the Environment Agency. The Environment Agency has provided an additional response dated 20 July 2023 which confirmed the model is acceptable for use within the Flood Risk Assessment (FRA) and maintained the Environment Agency's position in relation to floodplain compensation.	
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Scope and Structure of the ES Addendum

- 1.11 The issues addressed in this ES Addendum (December 2023) are only those that relate to the environmental topics scoped into the EIA process and that either seek clarification on matters identified in the ES (January 2022) or where the provision of a response to an issue may affect the assessment undertaken or conclusions reached.
- 1.12 Following analysis of the consultation comments reviewed above, it has been determined that additional information should be provided as part of this ES Addendum (December 2023) in respect of the following:
- Transport (updating Chapter D of the ES (January 2022)); and
 - Water Environment (updating Chapter K of the ES (January 2022)).
- 1.13 In addition, consideration has been given to:
- 1 Whether the minor change to the Application Site red line boundary (incorporating flood compensation into the scheme to address Environment Agency comments), could give rise to any implications for the remaining environmental topics within the ES (January 2022), and affect the assessment undertaken or conclusions reached – and as such should be scoped into this ES Addendum (December 2023).
 - 2 Whether the proposed highway scheme amendments, to address consultation comments received, could give rise to any implications for the remaining environmental topics with the ES (January 2022), and affect the assessment undertaken or conclusions reached – and as such should be scoped into the ES Addendum (December 2023).
- 1.14 Table 1.4 provides a summary of this consideration and whether additional information should be provided as part of this ES Addendum (December 2023).

Table 1.4 Review of implications for ES (January 2022) following proposed scheme amends

Environmental Topic	Consideration	Scoped in/out of ES Addendum
Transport and Accessibility (Chapter D)	Additional information to be provided to address consultation comments received. The minor change to the Application Site red line boundary will not affect the assessment or outcomes of the transport technical assessment contained within the Transport Assessment (TA) and Framework Travel Plan (FTP) - which have been reviewed and signed-off by WSCC Highways – and as such will not affect the conclusions reached in the Transport and Accessibility chapter of the ES (January 2022). It is noted that the TA and FTP include figures depicting the previous Application Site red line boundary. These are for indicative referencing purposes only and do not impact on the outcomes of the transport technical assessment. Additional information is not required with respect to the minor red line boundary change.	Scoped in – to account for consultee responses received.
Landscape and Views (Chapter E)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on the range of landscape and visual receptors. Whilst the amendments will result in an additional attenuation feature within the landscape, the landscape and visual effects will remain as predicted in the Landscape and Views Chapter of the ES (January 2022). No additional information is required.	Scoped out
Ecology (Chapter F)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on the ecological effects at the Application Site as a result of the Proposed Development. The flood compensation area and associated works will comprise reprofiling of an area of arable land, to be returned either to its existing arable condition or to grassland. The arable land is a habitat of very low / negligible ecological value and distanced from the Lidsey Rife. There would be no material change in terms of the value of the habitat in this area. As such, the works are unlikely to lead to any change to the predicted likely significant effects, and conclusions reached, insofar as this relates to designated sites, habitats or protected species as assessed in the ES (January 2022).	Scoped out

Environmental Topic	Consideration	Scoped in/out of ES Addendum
	Following a review of the latest Google Earth imagery (April 2023), the Application Site does not appear to show any material change since the last survey work at the site. No additional information is required.	
Air Quality (Chapter G)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on air quality. Whilst reprofiling of land for the flood compensation area will entail earthworks, this will not change the assessment or the outcomes of the Construction Dust Assessment undertaken for the ES (January 2022). As such, the conclusions reached in the Air Quality chapter remain the same. No additional information is required.	Scoped out
Noise and Vibration (Chapter H)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on noise and vibration. With respect to operational impacts, noting the outcomes of the traffic assessment have not changed, the assessment and conclusions reached in the Noise and Vibration chapter of the ES (January 2022) remain the same. With respect to construction impacts arising from the additional earthworks associated with the flood compensation area, the list of assumed plant equipment considered as part of the ES (January 2022) includes the equipment likely to be used for the earthworks. In addition, the flood compensation area is not located any closer to identified sensitive receptors. As such, the assessment and conclusions reached in the Noise and Vibration chapter of the ES (January 2022) remain the same. No additional information is required.	
Historic Built Environment (Chapter I)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on heritage.	Scoped out

Environmental Topic	Consideration	Scoped in/out of ES Addendum
	The amendments will not have any implications on the heritage assessment or conclusions reached in the Historic Built Environment chapter of the ES (January 2022). No additional information is required.	
Archaeology (Chapter J)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on archaeology. The amendments will not have any implications on the archaeology assessment or conclusions reached in the Archaeology chapter of the ES (January 2022). No additional information is required.	Scoped out
Water Environment and Drainage (Chapter K)	Additional information to be provided to address consultation comments received.	Scoped in – to account for consultee responses received.
Socio economics (Chapter L)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on socio economics. The amendments will not have any implications on the socio economics assessment or conclusions reached in the Socio economics chapter of the ES (January 2022). No additional information is required.	Scoped out
Climate Change Resilience (Chapter M)	A review of the proposed scheme amendments and minor change to the Application Site red line boundary has been carried out relative to the effects on climate change resilience. The proposed amendments will result in an improvement to the flood risk strategy. These changes are considered to have no material effect on the assessment contained in or findings of the Climate Change Resilience chapter of the ES (January 2022). No additional information is required.	Scoped out

1.15

This ES Addendum (December 2023) should be read alongside the updated Non-Technical Summary which supersedes Volume 3 of the ES (January 2022).

- 1.16 In conclusion, there is no requirement to submit additional environmental information in relation to the following environmental matters and the information provided in the original ES (January 2022) provides the most up to date position:
- Landscape and Views (Chapter E of the ES (January 2022))
 - Ecology (Chapter F of the ES (January 2022))
 - Air Quality (Chapter G of the ES (January 2022))
 - Noise and Vibration (Chapter H of the ES (January 2022))
 - Historic Built Environment (Chapter I of the ES (January 2022))
 - Archaeology (Chapter J of the ES (January 2022))
 - Socio economics (Chapter L of the ES (January 2022))
 - Climate Change Resilience (Chapter M of the ES (January 2022))
 - Cumulative Schemes (Chapter N of the ES (January 2022))
- 1.17 The sections addressing each of the matters scoped into the ES Addendum (December 2023) have adopted the following structure for consistency and completeness:
- **Response to Consultation Comments** – setting out, in tabular form, the issues raised by various respondents and to which a response is being provided, and a summary of any additional consultation or liaison with the relevant respondent to clarify the scope of information required and where the information has been provided in this ES Addendum (December 2023); and
 - **Resultant Updates to the ES (January 2022)** – where any responses set out above give rise to a need to otherwise reconsider any of the assessment undertaken in or conclusions of the ES (January 2022) then these are set out as appropriate.
- 1.18 Where there is no change to the assessment or conclusions of the ES (January 2022) then this is stated in each chapter for the avoidance of doubt.

Updated Legislative and Policy Context

- 1.19 To the extent to which it is relevant to the process of EIA, the technical sections of the ES Addendum (December 2023) include a brief summary of updates to policy relevant to establish the context within which the Proposed Development has been brought forward.
- 1.20 No updates have been made to National or Local Policy relevant to the overall process of EIA.

EIA Methodology, Processes and Difficulties

- 1.21 Amendments to any methodologies and processes, and any difficulties associated with the obtaining of the supplementary environmental information provided in this ES Addendum (December 2023) are stated where relevant within the technical sections. These amendments should be read in conjunction with the information provided in the ES (January 2022).
- 1.22 There have been no particular additional difficulties in preparing this ES Addendum (December 2023) to be highlighted.

Availability of Document

- 1.23 A paper or electronic (memory stick) copy of the full ES, including this ES Addendum (December 2023), can be obtained from:
- Lichfields, The Minster Building, 21 Mincing Lane, London, EC3R 7AG
 - Tel: +44(0)20 7837 4477
- 1.24 A request for a paper copy of the full ES, including this ES Addendum (December 2023) will be subject to reasonable copying and printing charges. A memory stick can be provided free of charge.
- 1.25 Information on the planning application and the ES can also be viewed at <https://www.arun.gov.uk/>, or during the opening hours of ADC at the following address:
- Arun District Council, Maltravers Road, Littlehampton, West Sussex BN17 5LF
 - Tel: 01903 737756
- 1.26 Those wishing to view copies of the ES in person at the offices of ADC are advised to check the current arrangements regarding access prior to attending the address noted above.
- 1.27 All comments on the ES (and the planning application) should be issued directly to ADC.

2.0

Transport

2.1

This section reviews consultation responses identified in Table 1.3 above received in respect of the assessment provided at Chapter D of the ES (January 2022). It also considers whether any changes are required to the assessment undertaken or conclusions provided in the ES (January 2022).

Representations Received Relating to the ES (January 2022)

2.2

The representations received are outlined above in Table 1.3. Table 2.1 sets out responses to those comments.

Table 2.1 Representations received relating to the ES (January 2022) and response provided

Consultee	Summary of comments received in response to the ES (January 2022)	Response to comments within the ES Addendum (December 2023)
WSCC Highways	Round one comment received 7 April 2022: Comments sought justification of the design speed of 30 miles per hour; confirmation of no departure from design standards; further information on the design of crossing points, arrangement of the pedestrian and cycle link beneath the bridge structure, bridge design and junction designs along the A29 realignment; and clarification on the modelling.	A response was issued on 17 May 2022 which provided updated documents and further information to address the comments. These reflected the pre-application advice that had been received from WSCC prior to submission. With respect to the highways modelling, WSCC sought clarification on how the other land parcels within the allocation had been accounted for in the modelling and also requested modelling for the opening year and interim/intermediate years of development. The response set out what the modelling included and the quantum of development on other land parcels within the allocation. It also explained that the modelling demonstrates that the scale of development proposed (1,250 homes) can be accommodated in the 2031 scenario and therefore on this basis the development can be accommodated in the years preceding this.
WSCC Highways	Round two comment received 10 May 2022: Further clarification was sought on the detailed design of the realignment A29 regarding the design of cycle lanes, roundabouts, crossing points and the relationship of the proposed southern tie-in with the existing A29 and an adjacent industrial unit.	A response was issued on 24 June 2022 which clarified the design approach to these matters and provided vehicle tracking where requested to assist WSCC in considering the design further.

WSCC Highways	Round three comment received 20 October 2022: Further clarification on the departures from standard and/or relaxations at both southern tie-in and Hanbury Link tie-in and the types of crossings and locations were sought.	A response was issued on 1 November 2022 which clarified the design approach to these matters. Further information was provided, as appended to the response. As requested, PF identified visibility splays on all proposed junctions and junction approaches and indicated where the appropriate 120m visibility could not be achieved. Departures from standard were noted as: On Hanbury Link roundabout southbound, visibility is below the 120m threshold required (68m achieved). On Lidsey Roundabout, visibilities are below the 120m threshold (41m achieved on the southbound approach and 90m achieved on the northbound approach). Following the workshop with WSCC on 9th November 2022, the design was amended to remove the proposed zebra crossings across the A29 near the junctions and replaced these with uncontrolled crossings with refuges at specific points related to bus stops. Signal controlled crossings had previously been proposed at the 'desire line' for pedestrians, but these were replaced with the uncontrolled crossings mentioned above. A series of drawings were provided showing the updated crossing provision and locations.
WSCC Highways	Round four comment received 9 and 15 November 2022: Further clarifications on the set-back of crossings, cycle routes, new Stage 1 RSA required for cycleway and speed surveys were sought.	A response was issued on 2 February 2023 which clarified these matters, as such addressing the distributions/positions of uncontrolled/controlled crossings, road design and layout and cycleways and associated provisions. The acknowledgement of an updated Stage 1 RSA and additional speed surveys was established during this round of comments, which are later resolved.
WSCC Highways	Round five comment received 23 November 2022: Further clarification was sought on circulatory carriageway widths for internal roundabouts and roundabout geometry.	A response was issued on 5 December 2022 which clarified these matters. One of the main issues was around the width of the circulatory carriageway on certain roundabouts. PF confirmed that regarding the point on circulatory widths at roundabouts, the Design

		Manual for Roads and Bridges (DMRB) standard CD116 section 3.6 indicates the width of the circulatory carriageway for normal or compact roundabouts shall be between 1.0 and 1.2 times the maximum entry width, excluding any overrun area. The roundabout A29-5 has 4 arms with varying entry widths, being: - Arm A – A29 North entry width = 6.78m - Arm B – East Link entry width = 6.52m - Arm C – A29 South entry width = 6.3m - Arm D – West Link entry width = 6.26m Therefore, the circulatory carriageway can be between 6.78 and 8.14m (being between 1.0 and 1.2 times the A29 North entry width). The proposed width is 8.14m. Roundabout A29-4 which has 4 arms with varying entry widths being: - Arm A – A29 North entry width = 6.34m - Arm B – East Link entry width = 6.23m - Arm C – A29 South entry width = 6.36m - Arm D – West Link entry width = 6.32m Therefore, the circulatory carriageway can be between 6.36m and 7.63m (being between 1.0 and 1.2 times the A29 South entry width). The proposed width is 7.63m.
WSCC Highways	Round six and seven comments received 28 March and 12 April 2023: Further clarification sought on the set-back of crossings, cycle tie-ins, Lidsey Rife bridge, visibility splay at Lidsey Farm Roundabout, street lighting and cycle routes.	A response was issued on 6 & 24 April 2023 which clarified these matters. Updated general arrangement drawings for approval and supporting text have been prepared to address comments outlined by WSCC Highways. The updated drawings respond to WSCC Highways comments.
National Highways (NH)	NH has sought clarification on details within the Transport Assessment (ES January 2022 Appendix D1) on trip generation, trip distribution and traffic modelling, reserving comment on technical matters until these matters are addressed.	Following a meeting with SYSTRA (on behalf of NH) and PF on 3 December 2022, PF produced a Technical Note (TN) in response to NH's comment on 22 November 2022. The TN addressed comments in relation to turning movements at the A27/Fontwell Avenue roundabout, providing visual representation of the queue lengths at the junctions within the study area and details of the mitigation schemes.

		Following the submission of the TN on 22 November 2022, WSCC required further information and on 16 December 2022 PF produced a TN in response to these comments. The TN addressed comments in relation to turning movements at the Rowan Way/A259/A29 and Saltbox/A29/A259 roundabouts. Following a meeting with SYSTRA (on behalf of NH) and PF on 18 April 2023, PF produced a TN in response to NH comment on 10 May 2023. The TN provided the traffic modelling results of sensitivity testing at the Bognor Road Roundabout, using a LinSig model provided by SYSTRA. In an email from SYSTRA (on behalf of NH), sent on 1 June 2023, NH asked PF to demonstrate that the modelled length of the queue on the A27 (W) arm at Whyke Road Roundabout would be manageable. PF produced a TN on 13 June 2023 to address this concern. The TN demonstrated that the modelled length of the queue on the A27 (W) arm would be manageable and would not block an access point, or lead to issues with sighting of the rear of the queue that would increase the risk of vehicle collisions. On 6th October 2023, NH lifted its holding objection and now “recommend that conditions should be attached to any planning permission that may be granted”. With this NH proposed a list of conditions. PF have queried two of the conditions as they relate to the Whyke and Bognor Road Roundabouts, to which BEW is not meant to make contributions according to the Arun Apportionment Study. Currently the client is awaiting a set of revised recommended planning conditions from NH.
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- 2.3 Full details of the responses to clarifications WSCC Highway and National Highways comments are contained within **Appendix 4**.

Updates to the ES (January 2022)

Updated Policy Context

- 2.4 There are no updates to the Policy Context detailed in Chapter D of the ES (January 2022).

Updated Assessment Methodology and Significance Criteria

- 2.5 There are no updates to the Methodology detailed in Chapter D of the ES (January 2022).

Updated Baseline Conditions

- 2.6 There are no updates to the Baseline Conditions detailed in Chapter D of the ES (January 2022).

Updated Potential Effects

- 2.7 There are no updates to the Potential Effects detailed in Chapter D of the ES (January 2022).

Additional Mitigation Measures

- 2.8 There are no updates to the Mitigation Measures detailed in Chapter D of the ES (January 2022).

Updated Residual Effects

- 2.9 There are no updates to the Residual Effects detailed in Chapter D of the ES (January 2022).

Summary and Conclusions

- 2.10 WSCC Highways and National Highways provided comment on the ES (January 2022). Their concerns raised are summarised below:

Round one comment received 7 April 2022:

- 2.11 Comments sought justification of the design speed of 30 miles per hour; confirmation of no departure from design standards; further information on the design of crossing points, arrangement of the pedestrian and cycle link beneath the bridge structure, bridge design and junction designs along the A29 realignment; and clarification on the modelling.

Round two comment received 10 May 2022:

- 2.12 Further clarification sought on the detailed design of the realignment of the A29 regarding the design of cycle lanes, roundabouts, crossing points and the relationship of the proposed southern tie-in with the existing A29 and an adjacent industrial unit.

Round three comment received 20 October 2022:

- 2.13 Further clarification on the departures from standard and/or relaxations at both southern tie-in and Hanbury Link tie-in and the types of crossings and locations were sought.

Round four comment received 9 and 15 November 2022:

- 2.14 Further clarification on the set-back of crossings, cycle routes, new Stage 1 RSA required for cycleway, speed surveys were sought.

Round five comment received 23 November 2022:

- 2.15 Further clarification sought on the circulatory carriageway widths for internal roundabouts and roundabout geometry.

Round six and seven comment received 28 March and 12 April 2023:

- 2.16 Further clarification sought on the set-back of crossings, cycle tie-ins, Lidsey Rife bridge, visibility splay at Lidsey Farm Roundabout, street lighting and cycle routes.
- 2.17 National Highways has sought clarification on details within the Transport Assessment (ES January 2022 Appendix D1) on trip generation, trip distribution and traffic modelling, reserving comment on technical matters until these matters are addressed.
- 2.18 A summary of the responses to the above comments are contained in Table 2.1 with the supporting documentation found at **Appendix 4**, including the updated drawings, as listed in Table 1.1, and detailed WSCC Highway and National Highways comments and responses outlined within Table 2.1.
- 2.19 The baseline conditions, and assessment of potential effects remain unchanged from that set out within the ES (January 2022). There are no additional mitigation measures proposed (this position is agreed with WSCC Highways and National Highways), and as such, the residual likely significant effects also remain unchanged from those set out within the ES (January 2022).

3.0 Water Environment

- 3.1 This section reviews consultation responses identified in Table 1.3 above received in respect of the assessment provided at Chapter K of the ES (January 2022). It also considers whether any changes are required to the assessment undertaken and conclusions provided in the ES (January 2022).

Representations Received Relating to the ES (January 2022)

- 3.2 In response to the submitted information, the Environment Agency provided an initial objection to the application in a letter dated 28 March 2022. The letter outlined two primary concerns, detailed as follows:
- 1 The FRA fails to take the impacts of climate change into account; and
 - 2 The FRA fails to outline floodplain compensation related to the Lidsey Rife bridge.
- 3.3 PF provided a detailed response to these comments in a note dated 5 October 2022 (document ref: 100148-PEF-ZZ-XX-RP-YE-000400), contained within **Appendix 5** of this ES Addendum (December 2023). The note confirmed that the FRA (as submitted) included key sections on the impacts associated with climate change that were applicable at the time of the submission of the ES (January 2022). Since submission, industry guidance included within the Planning Policy Guidance (PPG), has been updated (August 2022). The note confirmed that the FRA has been considered against this updated guidance, and the change in guidance does not affect the assessment carried out, including the assessment of baseline conditions or level of risk posed to the Application Site as climate change allowances have been considered.
- 3.4 Furthermore, the note provided a response to the comments on the need for floodplain compensation, confirming that the FRA submitted with the ES (January 2022) included hydraulic modelling, which demonstrated that there would be no significant change to flood levels as a result of the proposed A29 bridge over the Lidsey Rife. The note also set out that other crossing options were explored in the FRA, as part of the submitted Bridge Options Report contained within the FRA, which concluded that other types of span were not technically feasible or viable.
- 3.5 The Environment Agency then provided a further response dated 28 November 2022, on the need for the hydraulic model to undergo a peer review process to confirm its suitability in order to assess whether compensation measures would be necessary.
- 3.6 PF submitted the hydraulic model for peer review in April 2023 and two rounds of comments were received. The final Modelling Report, together with the latest peer review log sheet is included at **Appendix 6** of this ES Addendum (December 2023), contained within the updated FRA.
- 3.7 The Environment Agency has since confirmed that the hydraulic model is suitable for use within the FRA. But in July 2023 requested site-specific floodplain compensation details be put forward as potential mitigation. PF completed this exercise and determined that the principles of floodplain compensation would be achievable within the catchment with

further details provided within the accompanying FRA, briefly comprising an amendment to the red line boundary and definition of a floodplain compensation proposal.

- 3.8 Whilst some key modelling parameters have changed, the floodplain extent remains materially the same to that assessed in the FRA submitted with the ES (January 2022). The FRA has been updated (**Appendix 6**) to include consideration of information pertaining to floodplain compensation and the flood model approved by the Environment Agency, and so the conclusions of the originally submitted FRA remain consistent with the updated FRA. Any specific changes are noted within the Modelling Report.

Updates to the ES (January 2022)

Updated Policy Context

- 3.9 There are no significant updates to the Policy Context detailed in Chapter K of the ES (January 2022). The Environment Agency guidance on climate change allowances was updated in May 2022, however this relates to changes to peak rainfall allowances, along with other guidance, which does not affect the principles applied to the ES (January 2022) submission documents. The updated FRA confirms the latest climate change allowances for peak river flows have been considered, which do not materially change the conclusions of the submitted FRA.

Updated Assessment Methodology and Significance Criteria

- 3.10 There are no updates to the Methodology detailed in Chapter K of the ES (January 2022).

Updated Baseline Conditions

- 3.11 The hydraulic modelling, which defines the floodplain of the Lidsey Rife, has been updated. This has been considered as part of the peer review of the model by the Environment Agency, described at 3.3 to 3.8 above. These changes do not give rise to any material alteration to the baseline conditions at the Application Site identified in the ES (January 2022).

Updated Potential Effects

- 3.12 The revised modelling has quantified a change to flood levels within the floodplain associated with the A29 crossing over the Lidsey Rife, however the impact in terms of changes to flood risk elsewhere remains insignificant. Therefore, the potential effect set out in Chapter K of the ES (January 2022) remains unchanged.

Additional Mitigation Measures

- 3.13 Additional mitigation in the form of floodplain compensation has been considered and the principle has been demonstrated to be feasible within the amended red line boundary proposed near to the A29 crossing to facilitate these works.
- 3.14 This compensation would be provided in the form of level-for-level compensation and completed through a cut and fill exercise involving an amount of earth movement. The submission demonstrates a feasible solution, but this should be fixed as part of technical submissions for the A29 crossing, to be determined as part of a suitably worded condition.
- 3.15 This compensation would provide additional floodplain volume for that lost as part of the development of the A29 crossing. The assessment of the compensation required is based

upon a worst-case scenario i.e. accommodating the likely highest level of compensation that may be required.

3.16 Based on this assessment the Proposed Development can incorporate adequate floodplain compensation to mitigate any likely significant effects.

3.17 The detailed design of the proposed floodplain mitigation is proposed to be secured by a condition.

Updated Residual Effects

3.18 Due to the addition of floodplain compensation as part of mitigation, the residual effects of the A29 crossing have changed.

3.19 During construction, the construction management processes, and pollution prevention measures to be put in place would provide adequate mitigation such that the residual impacts from the A29 crossing and construction of floodplain compensation can be sustainably managed and mitigated. The residual effect would therefore be of **minor adverse significance**.

3.20 During operation the effects associated with the A29 crossing and the floodplain compensation are considered to be **minor beneficial** given the inherent mitigation by design, as well as providing additional floodplain volume above the existing available volume, further reducing the risk of flooding within the catchment.

Summary and Conclusions

3.21 The Environment Agency provided comment on the ES (January 2022) as submitted, stating two concerns: the use of appropriate climate change allowances in the Flood Risk Assessment; and consideration of flooding compensation measures for the proposed A29 crossing over the Lidsey Rife.

3.22 The point concerning the use of climate change allowances has been addressed within the response provided by PF (5 October 2022), which clarified what climate change allowances were applied to the FRA submitted with the ES (January 2022).

3.23 Contained within this same response, PF provided further commentary on the findings of the hydraulic modelling study as detailed within the FRA submitted with the ES (January 2022), which findings had concluded that floodplain compensation measures are not required.

3.24 The hydraulic model submitted with the ES (January 2022) has undergone a peer review process, with rounds of comments received from the Environment Agency and subsequently addressed by PF in March and June 2023. Although the hydraulic model has been updated, the overall modelled floodplain extent has not materially changed, as such the baseline conditions and potential effects remain unchanged from that set out within the ES (January 2022).

3.25 However, floodplain compensation is proposed within the Application Site boundary (as revised) and the modelling has demonstrated that this will mitigate the effects of the A29 crossing and provide beneficial effects. Whilst the construction phase residual effects would remain the same, due to the additional floodplain volume that would be provided through

the provision of compensation, the residual effect during the operational phase would become minor beneficial.

4.0 Summary and Conclusions

- 4.1 This ES Addendum (December 2023) has been prepared on behalf of C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited, together the 'Applicants', and reviews whether the findings of the ES (January 2022) remain the same in the context of minor design changes and comments received from consultees since submission of the ES (January 2022).
- 4.2 The conclusions reached within this ES Addendum (December 2023) are consistent with those identified within the ES (January 2022), noting the following:
- 1 With respect to transport and accessibility, the baseline conditions and potential effects remain unchanged from those set out within the ES (January 2022). There are no additional mitigation measures proposed (WSCC Highways and NH have agreed that none are required), as such the residual effects also remain unchanged from those set out within the ES (January 2022).
 - 2 With respect to the water environment and drainage, the baseline conditions and construction phase potential effects remain unchanged from those set out within the ES (January 2022). Floodplain compensation is proposed as part of the mitigation in relation to the A29 Lidsey Rife crossing. Due to the additional floodplain volume that would be provided through the provision of compensation, the residual effect for the A29 crossing during the operational phase would become minor beneficial.
- 4.3 There have been no changes to the assessment or conclusions detailed in the ES (January 2022) with regard to Landscape and Views, Ecology, Air Quality, Noise and Vibration, Historic Built Environment, Archaeology, Socio economics, or Climate Change Resilience.
- 4.4 No likely significant adverse effects in EIA terms have been identified in relation to the Proposed Development when taking into consideration the range of mitigation measures identified within the ES (January 2022) and those additional mitigation measures recommended within this ES Addendum (December 2023).

5.0 **Abbreviations, Definitions and References**

Abbreviations

- ADC Arun District Council
- BEW Land at Barnham, Eastgate and Westgate
- EIA Environmental Impact Assessment
- ES Environmental Statement
- FRA Flood Risk Assessment
- FTP Framework Travel Plan
- LTN Low Traffic Neighbourhood
- NH National Highways
- PF Pell Frischmann
- PPG Planning Policy Guidance
- TA Transport Assessment
- TN Technical Note
- WSCC West Sussex County Council

Definitions

- 5.1 Statutory Consultee – As defined within Regulation 2 of the 2017 EIA Regulations, this is considered to include ‘any body which the relevant planning authority is required to consult, or would, if an application for planning permission for the development in question were before them, be required to consult by virtue of article 18 (consultations before the grant of permission) of the Order or of any direction under that article’.

References

- 1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017