



Briefing Note

Project:	Woodgate Centre	Date:	October 2021
Subject:	EIA screening – supplementary information	Reference:	174103B

Introduction

- 1.1 This note provides a summary of the key environmental information provided in the technical documents submitted in support of the planning application for the Woodgate Centre, in response to Arun District Council's (ADC) request for supplementary information to support its EIA screening process (ref: AL/108/21/ESO).

Pollution and nuisances

- 1.2 An air quality assessment has been submitted in support of the planning application, looking at both construction and operational effects. The baseline air quality in the vicinity of the application site has been established through the compilation and review of appropriately sourced background concentration predictions and local monitoring data. The available data indicates that both the background nitrogen dioxide (NO₂) and the annual mean NO₂ concentration at roadside locations has not exceeded the National Air Quality Objectives (NAQOs). This supports the assumption set out in the applicant's screening (appended to the planning supporting statement) that the local air quality is good.
- 1.3 A construction dust risk assessment has been undertaken in line with IAQM guidance. It considers the risk of impacts during the construction phase in terms of nuisance dust, human health and ecological impacts. This concludes that overall, the development is considered to be high risk for nuisance dust soiling effects and low risk for particulate matter on human health. No ecological effects were identified. Appendix A of the air quality assessment provides details of the site-specific mitigation measures to be adopted during construction to reduce dust, such that the impacts are reduced to negligible. Residual construction phase effects are concluded to be not significant.
- 1.4 As agreed with ADC's air quality officer, a qualitative impact assessment has been undertaken along only the roads where the change in traffic flow exceeds the IAQM screening criteria. This concluded that the proposed development traffic would be unlikely to have a significant impact on local air quality. However, in accordance with the locally adopted Air Quality and Emission Mitigation Guidance for Sussex (2020), mitigation measures will be incorporated within the scheme to ensure that any potential impacts are minimised. In addition to 'damage cost' calculated through the guidance, sustainable travel measures are set out in the Travel Plan and any gas boilers will have an ultra-low oxides of nitrogen (NO_x) emission rating (<40mg/kWh).
- 1.5 Although not an EIA issue, the air quality assessment also considered the suitability of the site in air quality terms for the proposed development, which concluded that air quality is not a constraint to the proposed residential use.
- 1.6 A noise assessment report has been submitted in support of the planning application which consider the suitability of the site for residential use. It concludes that the use of

standard construction material (glazing and wall materials) will not result in an adverse noise effect, even with windows open. External garden noise levels will also be acceptable. The proposed development will therefore not be affected by the existing noise environment.



- 1.7 There is the potential for construction activities to generate temporary localised noise. However, the appended standard and proven construction methodologies will be implemented throughout the construction phase to ensure there are no significant effects from construction noise.
- 1.8 A ground investigations report is submitted in support of the planning application. This identified limited areas of made ground and potential sources of contaminants related to previous land uses (including agricultural use and a vehicle repair workshop). Although all soil concentrations in the made ground, topsoil and natural soils were below adopted screening levels for risk of adverse human health effects for a residential end use where tested, there were some areas of the site where access restrictions meant that ground conditions could not be fully investigated.
- 1.9 The ground investigation report therefore recommended that supplementary investigations be undertaken in some areas, including ground investigations and the testing of surface and ground water quality (as necessary). Following completion of the supplementary investigations, a remediation strategy will be prepared detailing the recommended actions to ensure risk to human health and the environment (specifically surface and ground water) is fully mitigated. Additionally, it is recommended that the construction environmental management plan (CEMP) include a specific health and safety section to consider the risk posed to construction works and set out any necessary standard mitigation, such as the use of appropriate PPE, hygiene practices and environmental monitoring. These measures will ensure that there will be no significant effects as a result of contamination.
- 1.10 Details of the proposed external lighting arrangements are set out in the Lighting Report submitted in support of the planning application. This includes measures, where appropriate, to minimise the potential for generation of light pollution. The report concludes that no light spill over 1 lux will occur horizontally beyond the boundary of the site and there will be no direct upwards lighting of the sky. Therefore, light nuisance or pollution will not occur and there will be no significant effects.

Relative abundance, availability, quality and regenerative capacity of natural resources in the area and consideration of underground elements

Ecological resources

- 1.11 The ecological assessment submitted in support of the planning application considers how the proposed development may affect the natural heritage resources of the area. The report sets out the findings of the phase 1 and phase 2 ecological survey work that was undertaken; the results can be summarised as follows:
 - The bat surveys recorded eight species using the site, with most of the activity associated with the common pipistrelle. A single soprano pipistrelle roost was recorded within one of the buildings on site
 - No signs of otter were recorded during the survey work, and this species was concluded to be absent from the site
 - Small mammal holes and trails were recorded within the vegetation of the banks of the watercourse on the east of the site, but no conclusive signs of water voles were recorded, and this species is considered unlikely to be present

- The dormouse survey confirmed the likely absence of the species
- No reptiles were recorded during the survey
- The habitats were sub-optimal for great crested newts and this species is considered unlikely to be using the site



- 1.12 The site was found to have low ecological value and, except for a single bat roost and bat foraging/commuting activity, does not support protected species.
- 1.13 Designated ecological sites in the wider area include the Singleton and Cocking Tunnels special area of conservation (SAC) (11.9km to the north west), which is designed for barbastelle bats which could be utilising the site for foraging. However, on-site habitats are suboptimal for barbastelles and only 0.1% of all bat activity registrations at the application site were recorded as this species. It is therefore considered that the proposed development would not have an adverse effect on this SAC.
- 1.14 The Duncton to Bignor Escarpment SAC is located approximately 9km to the north east. It is considered to contain habitat which is sensitive to changes in air quality (ammonia, oxides of nitrogen and sulphur dioxide). As this SAC is within 200m of the A258, and in response to a query raised by ADC, an air quality consultation response has been produced to determine if the traffic generated by the proposed development is likely to lead to changes in road traffic emissions that could affect the SAC.
- 1.15 The consultation response identifies that the proposal will result in an increase in traffic on the A258 of 12 vehicles (annual average daily traffic; AADT). This is well below the 1,000 AADT threshold set out in the Natural England guidance¹, therefore emissions associated with the 12 AADT development flow are not likely to be perceptible. The in-combination traffic emissions implications have been assessed within the South Downs National Park Authority Local Plan 2014-2033 (April 2018) Habitats Regulations Assessment (HRA). This HRA concludes *“that no adverse effects upon the SAC will occur from development provided by the Local Plan ‘in combination’ with growth from other sources.”* The South Downs HRA included consideration of the Arun Local Plan 2011-2031, in which the Woodgate Centre forms part of an allocated site. As such, no significant effects are predicted in relation to the Duncton to Bignor Escarpment SAC.

Trees

- 1.16 The arboricultural survey includes an assessment of 45 items, including 32 individual trees, ten tree groups and three hedgerows. Several trees/tree groups at the site are subject to a tree preservation orders (TPOs). Four of the surveyed items were found to be of high quality, 14 of moderate quality and 27 of low quality. The arboricultural report concludes no significant effect on trees or hedgerows.

Underground resources

- 1.17 In terms of underground considerations, there are no underground mineral resources identified for the site. In terms of underground services, a preliminary services appraisal has been submitted in support of the planning application. Service records and a utilities trace survey were used in the appraisal. This identifies a cast iron trunk water main passing centrally through the site on a north-south alignment and a public foul sewer running centrally east/west across the site. The water main is subject to an easement, which has been incorporated into open space in the masterplan for the development. No major or strategic underground gas, electricity or telecommunications services were identified within the application site, although there are local services

¹ <http://publications.naturalengland.org.uk/publication/4720542048845824>

connecting to the existing properties at the site. No significant effects are therefore predicted on underground resources.



Water environment

- 1.18 The Lidsey Rife (classified as a main river) is located on the east of the site and there are no formal surface water features within the site boundary. The site is mainly relatively flat, but slopes steeply downwards in the vicinity of the Lidsey Rife. The site is primarily in flood zone 1 with a narrow section of the east of the site in flood zone 3 (no built development is proposed within this zone), with a low risk of surface water flooding and a medium to low vulnerability to ground water flooding.
- 1.19 The drainage strategy has been designed to take account of the 1-in-100-year flood event plus a 30% allowance for climate change, in line with ADC policy, and a sensitivity check at 40% in line with Environment Agency guidance. Traditional infiltration techniques are not likely to be viable at this site due to the shallow ground water levels indicated in the on-site monitoring. It was therefore agreed with ADC that site attenuation could incorporate restricted discharge to the Lidsey Rife at a runoff rate that represents a betterment on the current situation. This will be achieved by attenuation features including lined permeable paving, swales and open storage ponds.
- 1.20 The comprehensive sustainable drainage system incorporated into the proposed development will reduce total suspended solids, heavy metals and hydrocarbons in the runoff and provide the necessary water quality treatment. Full details are set out in the flood risk assessment submitted in support of the planning application. The proposed development will not have an adverse effect in respect of flood risk and surface water drainage.
- 1.21 The sewerage undertaker for the site is Southern Water. It is anticipated that the proposed development will connect directly to the existing public sewerage network. Whilst Southern Water has confirmed that there is not currently capacity in the network to serve the development, it identified that it has a duty to provide network capacity within two years of the grant of planning permission.

Absorption capacity of the natural environment

- 1.22 Consideration of the absorption capacity of the natural environment in this context has been taken as looking at how changes to the natural environment generated by the proposal can be accommodated without causing environmental damage. This requires a review of all aspects of the natural environment, but cross refers where details have already been provided in a previous section of this supplementary information note.

Ecological elements

- 1.23 Any necessary construction mitigation requirements in relation to habitats and species on the site and in the adjacent area will be set out in the CEMP. Standard best practice construction techniques will be employed by the appointed contractor to prevent dust and spills, control runoff and sediment, and ensure that other materials (such as hydrocarbons or cement powder) are appropriately stored and handled during construction. These measures will ensure that the water quality in the watercourse on site and in the adjacent area is maintained such that any effect on associated habitats and species would be negligible.
- 1.24 Additionally, measures in terms of timetabling of construction works and establishment of tree and hedgerow root protection zones at the start of the construction period will be specified in the CEMP.



- 1.25 Standard best practice measures to avoid effects on breeding birds will also be set out in the CEMP, with works being undertaken outside the nesting season of March to August where possible. If it is necessary for works to take place in this period, a pre-construction bird survey will be undertaken to assess whether birds are nesting on the site. No works will be permitted within 50m of a nest until an ecologist has confirmed that all chicks have fledged.
- 1.26 A European protected species (EPS) licence will be obtained from Natural England as the proposal will result in the loss of the soprano bat roost. Mitigation requirements in relation to bats are identified as:
- All demolition works likely to disturb bats to be carried out during March – October
 - Toolbox talks to contractors prior to commencement and information signage to be installed
 - Prior to any demolition works, installation of a bat box on a retained tree, to remain in perpetuity
 - Building to be inspected by a licensed bat worker prior to demolition and any bats found to be removed by hand and placed within the new bat box
 - Stripping and demolition works of the area identified as a bat roost to be carried out by a licensed bat worker, using hand tools
 - All construction works to be undertaken in daylight hours to prevent disturbance of roosting, foraging or commuting bats
 - New external lighting to be hooded, directed away from vegetation (and the Lidsey Rife), using warm LED bulbs, motion activated (where appropriate) with the lowest Lux level possible for safety
- 1.27 The ecological assessment report sets out ecological enhancement measures. These focus on planting and open space, including the creation of new and improved bat foraging and commuting habitat (trees and hedgerows), sowing of wildflower meadows, and management of attenuation basins for wildlife.
- 1.28 The proposed development will lead to the loss of grazing land, but this habitat has low ecological value and the widespread availability of similar habitats in the vicinity means that no significant effects are likely on the area's habitats or protected species. The mitigation measures set out in the ecological assessment will safeguard any protected species which may be using the site. The biodiversity metric calculation (submitted in support of the planning application) identifies that the new habitat creation and enhancement measures set out in the ecological report represents a 16.05% increase in habitat units and a 382.76% increase for hedgerow units. This is more than the 10% biodiversity net gain required by the council.

Cultural heritage elements

- 1.29 The desk-based heritage assessment submitted in support of the planning application confirms that the nearest listed heritage assets lie at considerable distance from the application site, and it is therefore considered unlikely that the development will cause any harm to their fabric or historic value or cause any change to the character or qualities of their setting.
- 1.30 The assessment also considers the archaeological potential of the application site and its study area and examines the effect of any historic or existing impacts and (as far as possible) the effects of the proposal upon that potential. It was agreed with the ADC archaeology advisor that, in the absence of clearly identifiable archaeological features on the geophysical survey, further archaeological evaluation prior to submission was not

necessary. It was considered that any archaeological work deemed necessary could be carried out under the terms of a standard archaeological planning condition set out within the granting of planning consent. The proposed development will therefore not have a significant effect on either the built heritage in the wider area or any buried archaeological remains present on the site.



Trees

- 1.31 The majority of the trees on site will be retained, including all those that are classed as high and moderate quality, and those subject to TPOs. Nine trees, one hedge and three tree groups will be removed. All these items are of low quality, are not a constraint to development and the loss is more than compensated by the new tree and shrub planting which forms part of the landscape proposals.

Water environment

- 1.32 The FRA confirms that the site will conform to Defra's Non-Statutory Technical Standard for sustainable drainage systems, the CIRIA SuDS Manual and local requirements. The proposed drainage strategy will ensure that there are no adverse effects arising in relation to flood risk and surface water.

Landscape and visual

- 1.33 The proposed development will introduce new development to the site, which is currently partially undeveloped. However, the site is well related to the adjacent residential areas and the caravan park to the south and forms a natural extension to the built form in this location.
- 1.34 Whilst some local views into the site, such as those on the northern edge of the caravan park and the eastern edge of Woodgate, will change, due to the flat topography there are unlikely to be significant changes from the wider area, with any views being read in the context of the existing residential area of Woodgate. It is therefore considered that the landscape is well able to absorb the development proposed.

Extent and nature of impacts

- 1.35 As can be seen from the information set out in this document, any effects from the proposed development will be extremely localised, focused on the site and the nearby area. The potential effects identified in relation to the proposal include some which are adverse (pre-mitigation) and others that are beneficial in nature, primarily in association with enhancements being implemented by the scheme.
- 1.36 The range of mitigation measures proposed across the technical studies ensure that any residual adverse effects are not considered to be significant in an EIA context and that EIA is not required.



Appendix 1

Construction noise & vibration mitigation measures

Measures that will be implemented in order to minimise the noise and vibration impact on surrounding properties during construction are described in the following sections.

Liaison

Site neighbours that may be affected by noise and vibration will be identified and informed of:

- The proposed start date of the works
- The proposed duration of the works
- The nature of the works
- Contact details for appropriate site personnel and project personnel

During construction works, regular communication will be maintained with site neighbours, informing them of site progress and forthcoming works. A display board will be erected outside the site presenting contact details of appropriate site and project personnel.

Working hours

Construction activities shall be undertaken within the following working hours:

- 08:00 – 16:00 hours (Monday to Friday)
- 09:00 – 01:00 hours (Saturdays)
- No works on Sundays or Bank Holidays.

Any activities outside these hours will only be undertaken with prior agreement with the local authority planning and environmental health department.

Construction works methodology

At all times, construction works will be undertaken by best practicable means so as to reduce construction activity noise and vibration levels affecting neighbouring properties. As far as is practicable, it will be ensured that:

- Site activities only take place during the agreed operating hours when local ambient noise levels are generally higher, and not during quieter periods
- Noise from equipment and activities is attenuated at source, through the use of low-noise, well-maintained machinery, so as to minimise noise emissions
- Solid imperforate site hoarding (minimum surface density 5kg/m²) will be erected around the area of the works (minimum 2 metres tall), which will provide significant screening and acoustic attenuation of site activities
- Acoustic attenuation due to distance and screening of site activities will be maximised, via works programming, site hoarding and the new external façades

In particular, the following measures will be adopted where practicable:

- All deliveries/removals of materials and plant etc. will be undertaken during the working hours presented in Section 4.3.2 above
- The noisiest items of plant (e.g. generators) will be located away from neighbouring properties, and if necessary acoustic enclosures will be erected around them, in order to minimise noise emissions
- Temporary acoustic enclosures or shields will be constructed around noisy plant where necessary, in order to provide significant screening and acoustic attenuation



- Works will be programmed so as to reduce the duration of noisy activities close to neighbouring properties
- Equipment will be electrically powered from mains supply where possible, removing the need for noisy generators. If required at all, low-noise generators will be used
- Materials will be moved carefully (both manually and by machinery) in order to avoid dropping
- Screws and drills will be used as opposed to nails for erecting hoardings/enclosures etc, which will generate lower levels of noise
- Plant engines will be switched off whilst not in use, in order eradicate unnecessary noise emissions (i.e. idling will be minimised on-site)

Noise monitoring

Noise monitoring of site activities shall be undertaken at a location that is representative of the nearest noise sensitive properties. Monitoring shall be undertaken using a Type 1 sound level meter fixed to a tripod at a height of approximately 1.2 metres above ground level in free-field.

L_{Aeq} sound pressure levels shall be recorded at the monitoring position during site operating hours for an agreed duration that gives a suitable sample of the activity in question.

A report shall be prepared presenting the measured noise levels and a comparison with the agreed noise level limit.

Vibration monitoring

Monitoring of vibration associated with site activities shall be undertaken at a location that is representative of the nearest sensitive properties.

Peak Particle Velocity (PPV) vibration levels (in mm/s) shall be recorded continuously at the monitoring position during the activity in question. A report shall be prepared presenting the measured vibration levels and a comparison with the agreed noise level limits.