

Appendix 1.5

Arun District Council Scoping Opinion



Mr G Wilson
Drivas Jonas
85 King William Street
London
EC4N 7BL

Your Ref:

Our Ref: BE/140/07/EIS/KW/jw

PLANNING
- 4 DEC 2007
RECEIVED

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex, BN17 5LF
Tel: (01903) 737500
Fax: (01903) 716019
DX: 57406 Littlehampton
Minicom: (01903) 732765
e-mail: planning@arun.gov.uk

3rd December 2007

Please ask for:
Keith Wheway
Planning Services
Direct Line: (01903) 737794

Dear Mr. Wilson

The Town & Country Planning (Environmental Impact Assessment) (England and Wales) (Amendment) Regulations 1999
Scoping Opinion Request
Scoping Opinion for mixed use business park comprising up to 19,500 sq.m. of Use Class B1 and up to 4,500 sq.m. of Use Class A1
Land at Oldlands Farm, Bognor Regis

I refer to your application for a Scoping Opinion for the above development.

It is the view of the Local Planning Authority that an Environmental Statement should contain the following items scoped below:-

- (a) Archaeology
- (b) Ecology and Nature Conservation
- (c) Water Resources
- (d) Transport Issues
- (e) Noise
- (f) Air Quality
- (g) Landscape and Visual Issues
- (h) Agricultural Land
- (i) Utilities Infrastructure
- (j) Climate Change
- (k) Cumulative Impact (including other major developments in the area)
- (l) Soils and Land Contamination
- (m) Sustainability

Continued....

Ian Sumnall Chief Executive, Strategy Director • **Colin Rogers** Services Director • **Nigel Croad** Resources Director

www.arun.gov.uk



• Environmental Health
• Littlehampton and Bognor Regis Customer Services Help Points

I attach copies of replies that have been received from all consultees and the District Council's consultant which comprises part of this Scoping Opinion that explain the above items more fully and the necessary matters that need to be addressed.

I hope this information is of assistance to you.

Yours sincerely

A large black rectangular redaction box covering the signature of Keith Wheway.

Keith Wheway
Team Leader (West)

Enc



03/12/2007

SCOPING OPINION

MIXED USE BUSINESS PARK AT OLDLANDS FARM, BOGNOR REGIS

INTRODUCTION

Drivers Jonas has requested a Scoping Opinion in relation to development proposals at Oldlands Farm, comprising a business park and grocery store.

A screening opinion issued by Arun District Council on 25th September 2007 identified the proposed development as an EIA development as defined by the EIA Regulations¹. The development proposed falls within the description at paragraph 10(b) of Schedule 2 to the EIA Regulations and meets the criterion in column 2 of the table in that Schedule.

SITE DESCRIPTION

The site comprises undeveloped agricultural land situated in Shripney on the northern outskirts of Bognor Regis.

The site forms an area of land bounded by the Southern Cross Industrial Estate to the south with undeveloped agricultural land to the north and east. Buildings associated with Oldlands Farm are situated adjacent to the south eastern corner of the site. The A29 Shripney Road forms the western boundary, beyond which is a caravan park. A further caravan park is situated approximately 250m south-west of the site boundary, beyond the roundabout and a unit within the industrial estate.

A railway line runs past the site in a south south-westerly direction, approximately 125m from the site boundary at its closest point. A disused runway is located approximately 400m further south-east of the site.

CHARACTERISTICS OF PROJECT

The proposals are for a mixed-use employment scheme, comprising a business park (Use Class B1) of up to 19,500 sqm gross floorspace and a retail grocery store (Use Class A1) of up to 4,500 sqm net sales area. In addition the proposals include new highway, servicing infrastructure and landscaping. In total, the proposal site has an area of approximately 8ha.

¹ Town & Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999

SCOPE OF EIA

The scope of the Environmental Impact Assessment (EIA) should be considered in conjunction with detailed comments made by consultees and attached to this scoping opinion.

The scope of the EIA for individual topics is set out under their headings in this section. The general approach which should be followed for all topics is set out under "General", below.

General**Scheme Alternatives**

The Environmental Statement (ES) should present scheme alternatives that have been considered during the development of the scheme design. The principal environmental effects of the alternatives should be presented.

Temporal Scope

The EIA should assess environmental impacts associated with both the construction (including demolition and site preparation works) and operational phases of the development; where appropriate, assessment concerning the operational phase should consider effects in the opening year and ten years after opening. Where appropriate, the temporal scope of environmental effects should be defined in terms of duration and frequency of events.

Spatial Scope

The spatial scope of environmental effects should be defined.

Assessment of Effects

Environmental effects should be assessed against defined significance criteria which take into consideration the scale of the effect, the importance of the receptor and the policy context. Any uncertainty in predictions should be identified.

Mitigation

Where potentially significant adverse environmental effects are identified mitigation measures should be fully investigated; those proposed should be described in the ES. The residual environmental effects that will remain after implementation of mitigation measures

should be assessed. The views expressed by the statutory consultees should be taken into account during the scheme design stage, particularly with regard to mitigation of adverse environmental effects.

SUSTAINABILITY

Sustainability should be addressed in the ES; in particular how the proposals intend to deliver sustainability with regard to Planning Policy Statement 1: Delivering Sustainable Development. The issues that should be addressed include:

- Conserving energy, materials and other resources
- Reducing waste
- Sustainable transport
- Community and local economy
- Enhance the natural environment, particularly in relation to biodiversity.

COMMUNITY AND SOCIO-ECONOMIC

The community and socio-economic section of the ES should consider:

- Policy context at national, regional and local level
- Construction employment
- End use employment
- Spending effects
- Effects on economic development.

It is assumed a Retail Impact Assessment will accompany the planning application.

ARCHAEOLOGY AND CULTURAL HERITAGE

Field investigations of the proposed development site should be undertaken as part of the archaeological assessment.

The Archaeology and Cultural Heritage section of the ES should consider the effects of the proposals on geo-archaeology, below ground archaeology, historic buildings and historic landscape.

The archaeological assessment should:

- Identify statutory and non-statutory constraints on and in the immediate vicinity of the site

- Gather information about archaeological resource and historic land use from documentary and cartographic sources
- Report on the findings of field investigations
- Report on and evaluate any resources on the site
- Assess the potential for unrecorded resource on the site.

The archaeological assessment should be carried out in accordance with the Standard and Guidance for Desk-Based Assessment issued by the Institute of Field Archaeologists (IFA 2001).

ECOLOGY AND NATURE CONSERVATION

As part of the ecological assessment the following surveys should be completed:

- Phase 1 habitat survey of the site
- Protected species survey where suitable habitat is identified (including, for example, great crested newts, reptiles, water voles, badgers and bats)
- Follow-on surveys identified by the Phase 1 habitat survey and review of existing biodiversity records; e.g. birds surveys, botanical surveys or invertebrate surveys.

The Ecology section of the ES should include:

- A review of existing biodiversity data relevant to the site and its locality
- Habitats and species present on site and their status
- Assessment of the ecological connectivity of the site and its relationship with surrounding habitats
- Identification of where valuable habitats will be threatened, and how they will be protected and enhanced
- Any protected species that will be affected by the proposals including the species concerned, population level at the site, direct and indirect effects on that species and whether impact is licensable.

The ecological impact assessment should be in accordance with the Institute of Ecology and Environmental Management Guidelines for Ecological Impact Assessment in the UK². In carrying out the assessment, attention should be paid to objectives and targets set out in the local Biodiversity Action Plan.

² Institute of Ecology and Environmental Management (2006) Guidelines for Ecological Impact Assessment in the United Kingdom (version 7 July 20)

WATER RESOURCES

This section of the ES should consider surface water and ground water quality, surface water and ground water quantities and flood risk.

According to Environment Agency maps and records the site is in a flood risk area and the area is known to suffer from poor drainage. The Water Resources section of the ES should include:

- Risks presented by and control of drainage during construction
- A Flood Risk Assessment (FRA) from all potential flooding sources
- Assessment of the site drainage including its effects on off-site drainage.
- Assessment of risk posed to surface and groundwater resources

The FRA should investigate all forms of flooding and how surface water is to be managed in accordance with the guidelines within Planning Policy Statement 25 – "Development and Flood Risk" (PPS 25)

TRANSPORT

The Transport section of the ES should report the findings of a Transport Assessment (TA) of the scheme. The scope of the TA should follow the West Sussex County Council Transport Assessment Methodology and be agreed with the highway authority. The scope of the TA should enable assessment of environmental effects due to traffic generation that will be caused by the proposals, e.g. noise and air quality effects.

NOISE and VIBRATION

A noise survey should be undertaken at selected locations which are representative of noise receptors that may be affected by the proposed scheme or traffic generated by it.

The Noise and Vibration section of the ES should consider:

- Construction noise and vibration
- Noise due to traffic generation
- Noise due operation of the proposed scheme.

Criteria for the assessment of noise should, where appropriate, have regard to the following documents:

- Planning Policy Guidance Note 24: Planning and Noise, 1994 (PPG24)

- The Calculation of Road Traffic Noise (CRTN); Department of Transport, Welsh Office: 1988
- British Standard 8233:1999. Sound insulation and noise reduction for buildings - Code of practice
- BS 4142: Method for rating industrial noise affecting mixed residential and industrial areas: 1997
- BS5228:1997 Noise and Vibration Control on Construction and Open Sites, Part 1
- Design Manual for Roads and Bridges
- World Health Organization (WHO) Guidelines for Community Noise.

AIR QUALITY

The existing air quality at the site and surrounding locality should be modelled using existing air quality data with respect to nitrogen dioxide and fine particles (PM₁₀).

The Air Quality section of the ES should consider:

- The effect of construction activities on local air quality with respect to PM₁₀ and dust
- The effect of proposed scheme and traffic generated by it on local air quality.

Air quality should be assessed against national air quality standards and objectives, where they exist. The methodology employed should comply with that set out in the Design Manual for Roads and Bridges. The assessment should encompass all roads where traffic generated by the development will increase traffic flows by 10% or more, and junctions where queuing is anticipated.

LANDSCAPE AND VISUAL

The Landscape and Visual section of the ES should consider:

- Landscape character
- Landform
- Landcover, including trees and woodland
- Landscape pattern
- Public rights of way
- Visual amenity
- Important view corridors
- Skyline
- Obtrusive light

The assessment should:

- Define the zone of visual influence for the scheme
- Establish landscape character
- Identify sensitive landscape and visual receptors
- Assess landscape impacts during winter and summer

The assessment should consider impacts during construction, following completion of the scheme and 15 years after completion; and should have regard to the following guidance:

- Institute of Environment Management and Assessment / Landscape Institute, Guidelines on Landscape and Visual Assessment, 2002
- Countryside Agency and Scottish Natural Heritage Landscape Character Assessment, Guidelines for England and Scotland, 2002
- Institute of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, 2002.

AGRICULTURE

The Agriculture section of the ES should consider the effect of loss agriculture land with respect to:

- Soil resources and agricultural land classification
- Farm viability.

UTILITIES INFRASTRUCTURE

The ES should consider if additional infrastructure, i.e. water, gas, electricity and telecommunications, will be necessitated by the proposals and what environmental impacts will result.

WASTE

The ES should consider materials and on-site waste management practices during the construction and operational phases of the development. A waste management plan for the site should be outlined.

SOIL CONDITIONS AND CONTAMINATION

The assessment should include a desk study and risk assessment into the potential presence of contamination on-site, which may be mobilised as a result of the development.

Cumulative and Combined Effects

The EIA should include assessment of effects that may result from:

- The scheme in combination with other committed developments or known future activities that will occur in the scheme's zone of influence
- A single receptor being effected by two separate environmental aspects, e.g. the combination of air quality and noise effects on a single residential property.

Date: 22 November 2007
 Our ref: SU90
 Your ref: BE/140/07/EIS



Howard Cheadle
 Arun District Council
 Arun Civic Centre
 Maltravers Road
 Littlehampton
 West Sussex BN17 5LF

Phoenix House
 33 North Street
 Lewes
 East Sussex
 BN7 2PH

Dear Mr Cheadle

T 01273 476595
 F 01273 407930

Environmental Impact Assessment Scoping Report for Land at Oldlands Farm Bognor Regis

Thank you for your letter of 1 November regarding the above.

Recent case law¹ and guidance from the Office of the Deputy Prime Minister² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Natural England therefore advises that the Environmental Impact Assessment (EIA) should give full consideration to:

1. Landscape Character and Designated Areas

To ensure that the proposed scheme does not adversely affect the character of the surrounding countryside, we recommend that consideration should be given to the following aspects in the environmental impact assessment:

- The potential impact of the scheme on the landscape character and visual amenity of the surrounding area.
- The detailed design of the proposal should seek to respect and enhance local character and distinctiveness, and use appropriate materials and designs in all new built features.

Landscape and visual impacts

Natural England would wish to see details regarding local landscape character areas mapped at a scale appropriate to the development site and any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects on the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We strongly advocate the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2002. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change, and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed. Guidance on LCA, published by the Countryside Agency and Scottish Natural Heritage, is available at:

http://www.countryside.gov.uk/LAR/Landscape/CC/landscape_character_assesment.asp.

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* (April 2004)

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England would encourage all new development to consider the character and distinctiveness of the area, with the design and outlay of all elements of a proposed development reflecting local design characteristics and wherever possible using local materials. The Environment Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

2. Access and Recreation

Natural England would encourage any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks or urban fringe areas should also be explored to help promote the creation of a wider green infrastructure. To this end, relevant green infrastructure strategies put in place by local authorities should be incorporated where appropriate.

3. Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation (Natural Habitats &c.) Regulations 1994.

We strongly recommend that surveys for protected species (including, for example, great crested newts, reptiles, water voles, badgers and bats) should be carried out within the area affected by the development.

If any protected species are found the Environmental Statement should include details of:

- The species concerned;
- The population level at the site affected by the proposal;
- The direct and indirect effects of the development upon that species;
- Full details of any mitigation or compensation that might be required;
- Whether the impact is acceptable and/or licensable.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out by suitably qualified and, where necessary, licensed, consultants.

The great crested newt, dormouse and all species of bats are European protected species such that it is illegal to intentionally kill, injure or otherwise disturb them. If any of these species are found to be present you should also consult Natural England's Wildlife Management and Licensing Unit in Bristol (Tel. 0845 6014523) about licensing implications before any work can proceed.

4. Other features of nature conservation interest, e.g. habitats and species identified within the UK and Kent Biodiversity Action Plans.

Natural England advises that a habitat survey (analogous 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. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether BAP priority habitat);
- The direct and indirect effects of the development upon those habitats and species;

- Full details of any mitigation or compensation that might be required.

The development should avoid adversely impacting the most important wildlife areas within the site, and should if possible provide opportunities for overall wildlife gain.

5. Cumulative and in-combination effects.

The EIA should include an impact 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 the availability of information):

- a. Existing completed projects
- b. Approved but uncompleted projects
- c. Ongoing activities
- d. Plans or projects for which an application has been made and which are under consideration by the consenting authorities
- e. 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.

Please do not hesitate to contact me if you require any other information.

Yours Sincerely

Elaine Webster

Government Team

Tel: 01273 407931

Email: Elaine.webster@naturalengland.org.uk

Mr K Wheway
Arun District Council
Arun Civic Centre (1) Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: SX/2007/103052/01-L01
Your ref: BE/140/07/EIS
Date: 21 November 2007

Dear Mr Wheway

**SCOPING OPINION FOR MIXED USE BUSINESS PARK COMPRISING UP TO
19500SQM OF CLASS B1 AND UP TO 4500SQM OF USE CLASS A1
LAND AT OLDLANDS FARM, BOGNOR REGIS**

Thank you for your letter dated 1 November.

I can now give the following information which should be provided as part of the Environmental Statement (ES) in connection with the above site:

Ecology

The Ecology section of the Environmental Statement for the proposal should include:

- Assessment of the impact of the development during the construction and operation phases.
- Phase 1 habitat survey and protected species survey for the site, with follow up surveys where appropriate.
- Assessment of the ecological connectivity of the site and its relationship to surrounding habitats.
- Identification of where valuable habitats will be threatened, and how they will be protected and enhanced. Where any habitat loss is envisaged, like-for-like compensation is expected.
- Enhancement measures for biodiversity should be identified, to ensure a net gain in biodiversity value. This should include sustainable building measures such as Sustainable Drainage Systems (SuDS) and green roofs

Environment Agency
Saxon House, Little High Street, Worthing, West Sussex, BN11 1DH.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..

and walls, direct creation of habitats and enhancement of existing measures. Attention should be given to the ecological connectivity of the site, allowing the connection of habitats and the movement of species through and around the site. This can be considered along with amenity provision.

We are particularly concerned with wetland habitats and species, and expect these (existing and potential) to be given due attention within the report.

Flood Risk

According to agency maps and records the site is shown to be within a flood risk area and the area is known to suffer from poor drainage and the ditch networks are poorly maintained

A Flood Risk Assessment (FRA) and drainage strategy will be required which will need to investigate all forms of flooding and how surface water is to be managed in accordance with the guidelines within Planning Policy Statement 25 – "Development and Flood Risk" (PPS 25)

Advice on undertaking FRA's is on the website www.pipernetworking.com and further information on SuDS can be found in annex F of PPS25, the PPS25 Practice Guide, in the CIRIA C522 document Sustainable Drainage Systems-design manual for England and Wales and the Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS. The Interim Code of Practice is available electronically on both our web site at: www.environment-agency.gov.uk and CIRIA's web site at: www.ciria.org.uk

Protection of Controlled Waters

The assessment should include a desk study and risk assessment into the potential presence of contamination on site which may be mobilised as a result of the development.

It is known that a shallow groundwater table exists in the area, with sub artesian conditions being encountered to the south of the site. Any assessment on water resources should explore this potential condition and identify mitigation measures during and after construction to protect water resources.

Section 5.29 should include PPS23 Planning and Pollution Control.

Water Features

The identification of potential impacts should extend to the consideration of any water features (ie. wells, boreholes, springs, streams or ponds) in the area, including licensed and unlicensed abstractions.

Construction

Consideration for materials and on-site waste management practices during the construction stage should be included.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Cont/d..

Yours sincerely

HELEN TIER
Planning Liaison Officer

Direct dial 01903 703862

Direct fax 01903 215884

Direct e-mail TierH@environment-agency.gov.uk

End



ARUN DISTRICT COUNCIL
RESOURCES DEPT

19 NOV 2007

ACTION... Copy to Keith, Stephen C.,

MEMO

19 November 2007

FROM: Tracy Coleman, Senior
Environmental Assessment Officer

TO: Howard Cheadle, Head of Planning
Services

**Re: Town & Country Planning (EIA) (England & Wales) (Amendment) Regulations 1999
Consultation on Request for a Scoping Opinion**

**Scoping opinion for mixed use business park comprising up to 19,500 sqm of Use Class B1
and up to 4,500 sqm of Use Class A1
Land at Oldlands Farm, Bognor Regis**

The following comments are made in relation to the Environmental Statement Scoping Report, dated October 2007, in respect to the above Request for a Scoping Opinion.

The Scoping Report includes a scoping summary which outlines the results of a scoping exercise undertaken. This summary indicates the potential environmental effects considered and whether there is likely to be a significant effect from the implementation of the proposed development project. An analysis of the scoping summary indicates that the issue of climate change has not been considered and, given the inclusion of 'climate' within the EIA Regulations as a factor to be considered, I feel that this topic should be explicitly reported upon in the Environmental Statement.

Following the scoping summary the Report provides greater detail of what will be included in the final Environmental Statement. An analysis of this information has raised the following concerns:

Ecology and Nature Conservation

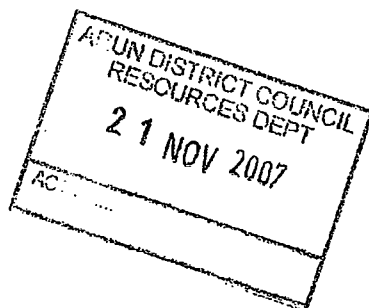
It is apparent from the report that the assessment of the effects of the proposed development project on ecological and nature conservation features will be based solely on a desk survey and that no field survey will be undertaken. The assumption made is that the reason for this is related to the timescales allocated for the preparation of the final Environmental Statement and that this does not allow for field studies to be undertaken at the appropriate time e.g. spring/summer. However, the inclusion of field studies to ascertain the true ecological structure of the site and surrounding area will provide a more comprehensive baseline which will feed into the determination of avoidance or mitigation measures. The concentration on desk studies relating to protected species and sites has the potential to overlook important habitats or microclimates that could be affected by the proposed development project. It is therefore suggested that field surveys are included in the methodology for the assessment on ecology and nature conservation.

The rest of the Scoping Report appears to cover other potential effects in sufficient detail, but advice relating to this should be sought from relevant environmental agencies.

Should you require any further advice or information relating to the Request for a Scoping Opinion, please do not hesitate to contact me.

Regards

Tracy Coleman



MEMO

21 November 2007

FROM:
 Brian Holland
 Engineering Services
 Direct Line 01903 737815

TO:
 Keith Wheway
 Planning Services
 Your Ref: BE/140/07/EIS

**The Town and Country Planning (Environmental Impact Assessment)(England and Wales) (Amendment) Regulations 1999
 Consultation on Request for a Scoping Opinion**

**Scoping opinion for mixed use Business Park comprising up to 19,500 sq m of Use Class B1 and up to 4,500 sq m of Use Class A1
 Land at Oldlands Farm, Bognor Regis.**

Keith

With reference to the request of 1st November 2007 for comments on the above application:

Generally, shouldn't the EIA include an outline of the main alternatives considered by the applicant and an indication of the main reasons for his choice, taking into account the environmental effects?

Section 3.3 and Table 1; I consider that 'Waste & Recycling' would have a permanent Operation Phase effect, considering the proposed use of the land, and it warrants a chapter on the impact of both Construction and Operational waste and any mitigating measures, e.g. emphasizing on recycling, re-use etc.

Section 5.26 should be extended to assess the effects of the development on the existing drainage pattern in the area.

With regard to section 5.27 & 5.28, mention should be made of an assessment of the incorporation of the various forms of Sustainable Drainage Systems (Suds) with regard to operational site drainage and control of pollution.

Water Resource impacts listed in 5.28 should be extended to include flooding from groundwater, rainfall and coastal sources, particularly in the Operation scenario.

Should there be a requirement for inclusion in the EIA of an assessment of how the long term 'carbon footprint' of the development can be minimised, ie by use of solar panels, grey water, wind generated energy etc., perhaps this is proposed to be included as part of the 'Sustainability' chapter.

I also note the reference (4.16) to the cumulative effects of all the developments within this area. How will this be addressed relative to all projects? For instance, construction of the

Keith Wheway

From: James.Neave@westsussex.gov.uk
Sent: 19 November 2007 14:21
To: Keith Wheway
Cc: John.Mills@westsussex.gov.uk; Don.Baker@westsussex.gov.uk
Subject: BE/140/07/EIS Scoping

Dear Mr Wheway,

Scoping Opinion for mixed use business park compromising up to 19'500 sqm of Use Class B1 and up to 4,500 sqm of Use Class A1. Land at Oldlands Farm Bognor Regis.

In the absence of any specific proposal details, the framework for the Environmental Statement would appear to cover the likely main impacts. The only comment I would have is that there does not appear to be any inclusion of alternative sites studied by the applicant (and reasons for their final choice).

I have passed this document on to the WSCC Ecologist (Don Baker) and Archaeologist (John Mills) who will comment to you via email if considered necessary.

Regards,

James Neave - Planner
(01243) 756864

—
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<http://www.star.net.uk>

21/11/2007

**WEST SUSSEX COUNTY COUNCIL
HIGHWAYS AND TRANSPORT SERVICES CONSULTATION**

DATE: 20th November 2007

**FROM: Ian Gledhill TO: Arun District Council
FAO: Keith Wheway**

SUBJECT: BE/140/07/EIS - Scoping opinion for mixed use business park comprising up to 19,500 sqm of Use Class B1 and up to 4,500 sqm of Use Class A1.

Land at Oaklands Farm, Bognor Regis, West Sussex

CONSULTATION DATE: 2nd November 2007

RECOMMENDATION:

**Advice
Objection**

**Modification
No Objection**

**More Information
Refusal**

TAD contribution: £

WSSC Highways have now received a copy of the scoping assessment for the Transport Assessment, hence it is considered appropriate to keep the detail in respects of the required TA within the actual EIA to a minimum. Nevertheless, I would offer the following comments,

Para 5.39 refers to a study "defined by those links where traffic flows will increase by more than 30%, or in sensitive areas where traffic flows are likely to increase by more than 10%." Whilst this is OK for consideration of environmental impacts from traffic such as noise and air quality, the study area for highway capacity impacts will be required to follow the WSSC Transport Assessment Methodology and consider all junctions with a net increase in traffic flow of 30 vehicles or more at either peak traffic hour.

Likewise the years for assessment for highway capacity and delay issues are those from the National and WSSC guidance on TA's i.e. opening year and also 5 years from application, whereas para 5.42 proposes opening year for assessment of environmental impacts from traffic.

Further the thresholds for scale of change referenced in para 5.45 are OK for issues such as noise but must not be applied to traffic delays or transport demand and mode shifts, where guidance on TA's on thresholds for analysis and on definitions of material impacts must be used.

As a further general point, it would be appropriate to include within the EIA that the TA is to follow the WSSC Transport Assessment Methodology.

It is also duly noted that the EIA scoping study does not mention the housing development (known collectively as Site 6) or the Bognor Regis Relief Road. Due consideration must be given to the impacts of these developments within the EIA.

**Ian Gledhill
Development Planning**

Keith Wheway

From: Mark.Taylor@westsussex.gov.uk
Sent: 12 November 2007 17:18
To: Keith Wheway; Howard Cheadle
Subject: Request for Scoping Opinion - Land at Oldlands Farm, Bognor Regis (ref BE/140/07/EIS)

Dear Keith,

Further to Arun District Council's letter of 1st November enclosing a copy of the Scoping Report prepared by Drivers Jonas I offer the following comments:

The Scoping Report fully recognises that Archaeology and Cultural Heritage should be addressed in the preparation of the Environmental Statement and Table 1 (page 3) identifies the fact that the effect of the construction phase upon archaeology could be significant, negative and permanent.

The aims and objectives of the proposed assessment method are set out in section 5.8 and 5.9 of the report. In practice, what is proposed is a 'desk based assessment' and 'walkover' survey of the application site. This approach will synthesise current knowledge of the application site and its potential (which should also consider the geo-archaeological potential of the site which sits on a spur of land at the confluence of the alluvial deposits of the Aldingbourne Rife and Ryebank Rife but may also contain evidence of the early prehistoric land form). However, a desk based assessment stops considerably short of the quality of evaluation data which can be obtained by field survey involving trial archaeological trenches and as a 'best practice' approach I commend this course of action in order that the Environmental Statement can inform the determination of the Outline Application with answers to the mitigation strategy to be adopted and whether or not preservation *in situ* of important buried remains needs to be considered. PPG16 provides a reminder that it is open to developers to submit such a report based on field investigations and policies in the Structure Plan (CH7) and Arun Local Plan (AREA16 and 17, amplified by the SPG on Archaeology) sustain this approach.

As it happens, the archaeological evaluation of the Felpham Site 6 land area partially overlaps with the indicated area of the application site in the Drivers Jonas report. In particular, the north western corner of the site, adjacent to the A29 was covered by the field evaluation undertaken by Wessex Archaeology in December 2006 and and early 2007. In one of the trenches (no. 235 in the Wessex Report of March 2007) Romano-British material indicative of a possible small settlement or farmstead was found together with an earlier linear feature considered to be Bronze Age. The Roman material included pottery, fired clay, burnt flint associated with ditches and post hole features. It is impossible to characterise the likely pattern of historic settlement activity for the rest of the Oldlands Farm site from just one trial trench but it illustrates the importance of direct physical intervention in refining the assessment and evaluation process and commenting upon proposals from a position of knowledge.

In summary, I would advise that while the Environmental Statement will clearly include a Desk Based Assessment of the potential impact upon archaeology as a minimum I would recommend that a Field Evaluation should be undertaken at the earliest opportunity and that consideration should be given to moving directly to this level of survey (if need be incorporating DBA and field evaluation results in one report) to enable the ES to be fully informed on the Cultural Heritage impacts.

Yours sincerely,
Mark Taylor, Senior Archaeologist

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13/11/2007

Keith Wheway

From: Graham Evans
Sent: 09 November 2007 11:55
To: Keith Wheway
Subject: BE/140/07/EIS - request for scoping opinion

Keith

No comments - proposed assessments for noise and air quality are satisfactory,

Regards

Graham Evans
Senior Environmental Health Officer
X 37694

PS:- Scoping Report returned in internal mail.

12/11/2007