

From: Amanda Scholes on behalf of Planning.Responses
Sent: 19 June 2017 12:19
To: Planning Scanning
Subject: FW: Land West of Bersted - Scoping Opinion
Attachments: dps1.pdf

Hi
This is the right one .
Mandy

From: Claire Potts
Sent: 19 June 2017 12:07
To: Planning.Responses
Subject: FW: Land West of Bersted - Scoping Opinion

Please upload this response from the EA to BE/65/17/EIS.

Thanks

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Strategic Development, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37698 | External: +44 (0) 1903 737698 E-mail: claire.potts@arun.gov.uk
Visit Arun's web site at www.arun.gov.uk  Save the environment - think before you print.

Sent: 19 June 2017 12:05
To: Claire Potts; Planning.Responses
Subject: Land West of Bersted - Scoping Opinion

Apologies for confusion – EA response which was sent to you last week on 13th June.

Thanks,

Hannah

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

Our ref: HA/2017/119464/01-L01
Your ref: BE/65/17/EIS
Date: 13 June 2017

Dear Sir/Madam

SCOPING OPINION FOR MIXED USE DEVELOPMENT TO INCLUDE UP TO 2300 NEW HOMES, UP TO 10HA OF EMPLOYMENT LAND, A 3 FORM ENTRY PRIMARY SCHOOL, A LOCAL CENTRE & ASSOCIATED INFRASTRUCTURE LAND WEST OF BERSTED, BOGNOR REGIS

Thank you for your consultation requesting an EIA Scoping Opinion on the above site. We have reviewed the documents and have the following comments to make.

We are pleased to see that the Environmental Statement will include chapters on the water environment; ecology and nature conservation; and ground conditions and contamination and be supported by key documents including Foul and Surface Water Drainage Strategies, Ecology Surveys, Flood Risk Assessment and Phase 1 Geo-Environmental Desk Study.

We would wish to make the following specific comments on issues within our remit.

Water Environment

As drafted the Scoping Report (para's 5.27, 5.34 and 5.35) makes reference to PPS25 which is no longer valid. References and further work on the Flood Risk Assessment should refer to the National Planning Policy Framework and its associated Practice Guidance.

The site lies within Flood Zone 1, however, due to the size of the site a Flood Risk Assessment (FRA) will need to be submitted as referenced in the Scoping Report.

The FRA will be assessed by West Sussex County Council, as the Lead Local Flood Authority (LLFA) and we recommend that you consult with them on any specific requirements for the FRA and the Environmental Statement. The FRA for this site, particularly with regards to the drainage strategy will be a major consideration. There are high groundwater levels, poor permeability soils, and a limited number of watercourses available for disposal of surface water and a flat topography. Groundwater monitoring will be required as part of the drainage study.

It is also noted that within the site boundary, there are existing above ground reservoirs, used for irrigation purposes. An assessment of these reservoirs as part of the FRA will be needed, both in terms of their future use, present safety and should the embankments fail, the route and depth of flooding determined.

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

We would also recommend that a flood risk and drainage masterplan for the entire site is produced and not one that makes assessments based on development phases.

Revisions to climate change allowances came into force on the 19 February 2016. When undertaking FRA's, surface water run-off calculations should be assessed based on a 1 in 100 year flood event plus 20% for design and 40% for exceedance events. For fluvial flooding 45% should be added to the 1 in 100 flood. The website <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> gives more information on the revisions.

Ecology and Nature Conservation

We broadly support the proposed methodology set out in the Scoping Report. We also support the inclusion of a Construction Environmental Management Plan for the construction phase in order to reduce adverse effects on species and habitat.

We agree with the proposed biodiversity survey list and as part of our remit have particular interest in the results of surveys for wetland species such as GCN and water vole. As we are principally concerned with these wetland species, we would want to see that there is no loss of wetland habitat in the form of ditches, ponds or wetland features as a result of the development. Justification must be given for any loss and we would expect at least like for like compensation should this be the case.

Existing Nature Conservation features currently found within the site such as mature trees, hedgerows & watercourses should be retained wherever possible and incorporated into the site design in order to retain a continuous corridor for wildlife throughout the development. We would wish wildlife considered through the design of the drainage strategy and for this to take opportunities to ensure it is beneficial for wildlife.

On a site as large as this, opportunities for enhancement to the natural environment and the provision of green infrastructure should be considered at an early stage.

Ground conditions and Contaminated Land

We support the inclusion of this section and that the Environmental Statement will identify all risks from contamination and ensure that appropriate action, including remediation where necessary, will be taken to address these risks.

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

Yours faithfully

Hannah Hyland
Planning Specialist, Environment Agency



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