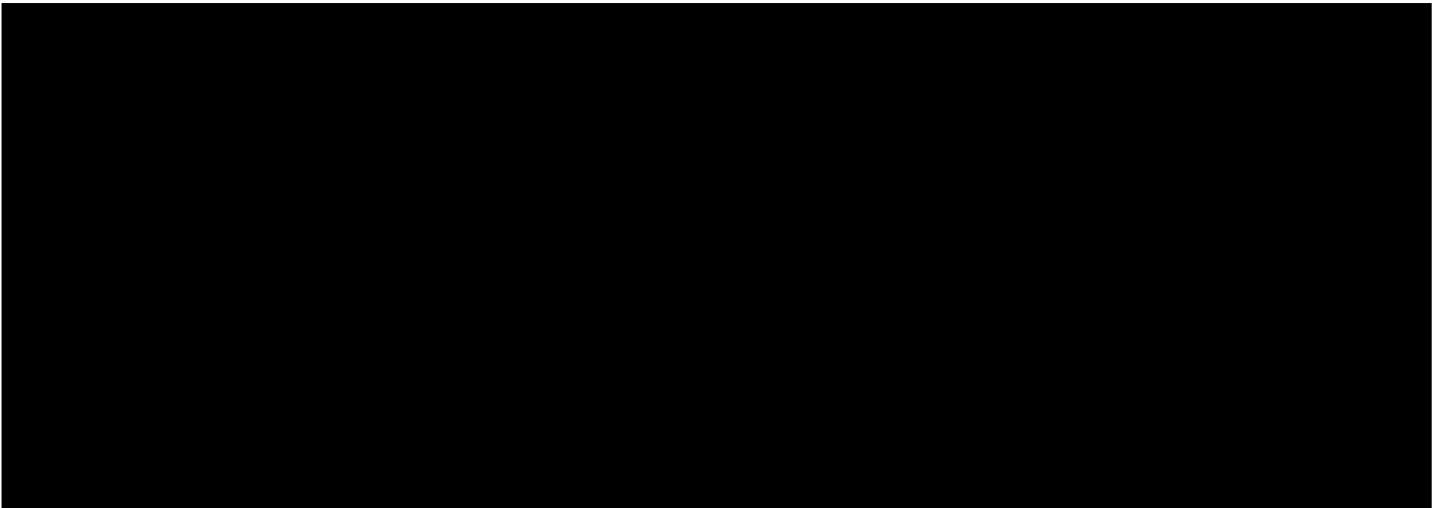


From: Joanne Lewis <Joanne.Lewis@arun.gov.uk>
Sent: 23 October 2020 12:59
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/112/20/EIS

I refer to the above consultation on the Environmental Scoping Opinion and confirm that I have reviewed the following sections of the report specifically in order to comment from an Environmental Health perspective;

- Air Quality
- Noise and Vibration
- Ground Conditions and Soils

Air Quality

- I am disappointed to see that no real monitoring of air quality is planned as part of the EIA. The Council's two closest air quality monitoring sites are in Barnham and at the level crossing in Westergate. However, these are new sites which have only been in existence since January 2020 and have been disrupted by Covid 19 so there is very little real data from the area. I would therefore recommend that baseline data is gathered from the area through real monitoring rather than relying on predictions and modelling. Monitoring locations should be approved by the Council Environmental Health Team prior to commencement.

- Traffic data used in the modelling should be based on worst case scenario figures and be projected into the future so that we are not faced with an air quality problem a few years after completion.
- The rerouting of the A29 is going to bring a major new road source close to the proposed housing and this raises significant concerns from both air quality and noise perspectives. I would therefore expect to see careful site layout planning to ensure that new residents are not exposed to unacceptable air quality and that projected increases in traffic levels over future years once the road and housing are fully occupied are taken into consideration to ensure that air quality objectives will not be breached within a few years of completion.
- The Government has plans to introduce new air quality targets as part of the Environment Bill, including objectives for PM2.5. Although these objectives are not yet known it would be useful for the air quality assessment to include PM2.5 in the area during operation as well as construction phases.
- An application should also include mitigation measures to reduce road traffic in the area including but not limited to electric vehicle charge points for every home with a drive or garage as well as public charging points for residents without allocated parking and visitors as well as at all businesses and community facilities e.g. school, community centres. The Council's existing requirements can be found in the Arun District Council Electric Vehicle Infrastructure Study (November 2017).
- There is no mention in the document of any assessment of odour from the sewage treatment works close to the southern site boundary. It is not clear from the maps whether any housing is proposed in this area of the site but if it is an odour assessment will be required. If no housing is proposed in this area this should be made clear so that odour can be discounted as a potential issue.

Noise and Vibration

- I have concerns about cumulative noise from road and rail sources affecting residents of the new development and the noise assessment should ensure that it takes into account all potential noise sources in combination.
- Environmental Health would expect to see that the submitted noise assessment includes a scheme that proves internal noise levels within all new residential properties will conform to the "Indoor ambient noise levels for dwellings" guideline values specified within Table 4 under section 7.7.2 of BS 8233:2014 and demonstrates that the external noise levels within the curtilage of residential units will conform to the "Design criteria for external noise" upper guideline value of 55 dB LAeq,T as specified within section 7.7.3.2 of BS 8233:2014.
- Noise assessments should also include noise and vibration from any proposed or existing pumping stations and electrical sub stations which may impact the noise environment.

Ground Conditions and Soils

- The site is adjacent to some areas of land which have been identified as potentially contaminated and would require further investigation before development.
- Providing a report which follows the Methodological Approach set out in section 15.9 of the submitted EIA Scoping Report is submitted alongside the planning application it is acceptable for this to be scoped out of the EIA.

Please note that I work part time and my working hours are usually 09.30 – 14.45 Tuesday – Friday.

Joanne Lewis

Senior Environmental Health Officer,
Environmental Health

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 03 October 2020 10:49

To: EHPlanningConsultations [REDACTED]

Subject: Planning Consultation on: BN/112/20/EIS

To: **Environmental Health - Planning consultation**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/112/20/EIS

Registered: 23rd September 2020

Site Address: Land at Barnham, Eastergate and Westergate

Grid Reference: 494767 104607

Category:

Description of Works: Environmental scoping opinion for up 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields and early years provision (nursery).

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Consultation on Request for a Scoping Opinion

An application has been lodged for a scoping opinion. The Council has to respond in writing stating what information needs to be provided as part of an Environmental Statement that might be required in connection with the proposed development.

The development is described in the attached plans and written material:

[Click here to view documents available on our website](#)

[Click here to view the status of the application.](#)

I would be grateful for your electronic comments made on the website or by emailing to planning.responses@arun.gov.uk by **24th October 2020**.

Please be aware that any comments you may make will be available to view on our website

Please note the importance of the scoping opinion to any subsequent Environmental appraisal process. If you are in any doubt as to what is being requested please see the above regulations.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

James Cross

Planning Case Officer- Arun District Council

Telephone: 01903 737784

Email: james_cross@arun.gov.uk

PLCONEIS (ODE) 2020