

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

Our ref: HA/2020/122644/01
Your ref: BN/112/20/EIS
Date: 30 October 2020

Dear Sir or Madam,

ENVIRONMENTAL SCOPING OPINION FOR UP 1,500 DWELLINGS, COMMUNITY FACILITIES, LOCAL CENTRE (SHOPS AND SERVICES), A PRIMARY SCHOOL AND ASSOCIATED PLAYING FIELDS AND EARLY YEARS PROVISION (NURSERY).

LAND AT BARNHAM, EASTERGATE AND WESTERGATE.

Thank you for consulting the Environment Agency on the above Scoping Opinion.

We have reviewed the EIA Scoping Report (September 2020) and our comments are set out below.

Overall we are generally pleased with the scope of the report and the range of topics that have been proposed to be included within the Environmental Statement (ES). We have provided some more detailed comments on two aspects of significance for the site (flood risk and ecology) below.

Flood Risk

Based on the Environment Agency flood maps and records for the area of interest, the vast majority of the site is shown to be within Flood Zone 1, apart from areas adjacent to the Main River watercourses, which are within Flood Zone 3.

The most notable element of the proposal, in conjunction with the flood zone, is for the route of the new road. **Clear span crossing(s)** of river(s) would be our preferred choice, but also ensuring that any loss of fluvial floodplain compensation be replicated (level for level) elsewhere.

At the time of writing, it is understood that flood modelling is to be provided to inform the Flood Risk Assessment (FRA) at the hybrid planning application stage. It is also important to note that drainage from this area discharges to sea, and is therefore subject to tide lock. Furthermore, as there is very little gradient on these ditches, during periods of prolonged rainfall, the dispersal of water from the catchment is a slow process, and field waterlogging an associated issue with the catchment. The FRA should cover this issue.

Environment Agency
Oving Road, Chichester, West Sussex, PO20 2AG.
Customer services line: [REDACTED]
www.gov.uk/environment-agency

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As part of the development proposals, early discussions have taken place with us and the Applicant's representatives regarding flood defence improvements, which are to be incorporated into the development and secured by way of a developer contribution in conjunction with a legally binding agreement. This will not only benefit the site itself, but also bring improvements to the Aldingbourne Rife drainage catchment as a whole.

Reference is made to in the Scoping Report (section 12.27) to an intention to daylight and remove an existing culvert (School Stream). We would welcome and support this proposal from a flood risk perspective.

Ecology and the Water Environment

We agree that the relevant issues of ecology and the water environment have been scoped in to the ES. We make the following general comments around our particular areas of concern:

- Extensive Phase 1 surveys and specific surveys for protected species, including Water Voles, will need updating nearer to construction.

Full mitigation strategies will need to be developed for inevitable impacts upon the Water Vole population in the Lidsey rife.

- We are pleased to see the proposed retention of the Lidsey Rife and the development of a linear park along its length. A plan should be developed to increase connectivity across the development site for biodiversity, including hedgerow planting/filling and possible crossing points for mammals on the road network.
- As proposed Biodiversity Net Gain must be sought in line with section 174 of the National Planning Policy Framework and current legislation. Ideally, at least 10% net gain should be delivered.
- Similar to our comments in regard to flood risk above, we support the use of clear span bridges wherever possible rather than culverts, and hope to also see the inclusion of the proposed daylighting of the School Stream taken forward into development on an ecological basis as well.
- Any created wetland habitat on site that permanently holds water should be designed to support a wide range of aquatic species, including suitable habitat for Water Voles.
- We note that there is no mention of aquatic species beyond Water Voles and a lack of Great Crested Newts in the footprint. The rife will hold fish species in particular numbers of European Eel which are protected (European eel are listed as Critically Endangered by the IUCN's red list of Threatened Species and are afforded protection under UK legislation from entrapment or injury under the Eels (England & Wales) Regulations 2009). The ES should consider this with regard to water quality and potential pollution during the construction phase.

Advice to the Applicant

Flood Risk Activity Permits

Any works or proposed structures in under or over the Lidsey or Barnham Rife Main Rivers, or within 8 metres of the bank edges (including in regard to works to remove the existing culvert), will require a Flood Risk Activity Permit (FRAP) from us under the Environmental Permitting (England and Wales) Regulations 2016.

It must be borne in mind that any future FRAP applications will need to carefully consider ongoing and future watercourse maintenance activities undertaken by us under our permissive powers, and those of the riparian landowners.

Further details about FRAPs can be found on the gov.uk website using the following link:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Applicant should note that such permit(s) are separate to and in addition to any planning permission granted. The granting of planning permission does not necessarily lead to the granting of a permit.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully,

Mrs Sophie Brown
Sustainable Places Advisor

