

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

Our ref: HA/2019/121875/01-L01
Your ref: BN/122/19/EIS

Date: 18 December 2019

Dear Sir/Madam

SCOPING OPINION FOR A RESIDENTIAL DEVELOPMENT OF UP TO 500 HOMES AND A DEDICATED BEDROOM CARE HOME. LAND NORTH OF BARNHAM ROAD, EASTERGATE

Thank you for consulting the Environment Agency on the above Scoping Opinion. Our comments are set out below.

We have reviewed the Environmental Impact Assessment (EIA) Scoping Report and overall support the issues that have been scoped in and out of the assessment. However, as a general point we recommend that the EIA considers more broadly how this development will sit with the wider allocation set out in Policy H SP1, Policy H SP 2 and Policy H SP2c Inland Arun Barnham/Eastergate/Westergate (SD5) of the Arun Local Plan. These policies sets out a number of requirements for the strategic allocation and for this site have has been further complemented by Arun District Council in the production of High Level Design Principles for the whole allocation. We would wish to see these reflected through the EIA and the wider planning application submission.

Chapter 10 – Water Resources, Flood Risk and Drainage

We are pleased that the water environment has been scoped in to the EIA.

We would recommend that full consideration is given to the site in the context of the wider allocation and the policy requirements set out in the Arun Local Plan. Notably opportunities should be considered to ensure that a comprehensive surface water management strategy is developed and takes on board recommendations from the Arun Strategic Surface Water Management Study.

Para 10.3.1 – we would recommend consultation with Southern Water with regard to the foul drainage issues.

Chapter 14 – Ground Conditions, Agriculture, Soils and Contamination

We support the conclusion that these issues can be scoped out of the EIA, however, we have the following comments that should be considered as part of the planning application submission.

The site rests upon superficial deposits of river terrace & head deposits, underlain by

Environment Agency
Portfield Depot Oving Road, Chichester, West Sussex, PO20 2AG.

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London Clay. The superficial deposits are designated as secondary aquifers whilst the London Clay is designated as an unproductive aquifer.

The site is located within Source Protection Zones 1c & 2c – which represents an area of groundwater sensitivity but is confined beneath impermeable geology. Any penetrative or foundation works would therefore cause a risk by removing the impermeable geology and exposing the sensitive aquifer beneath. Additionally, whilst the underlying bedrock is not considered a productive aquifer the area is known to be susceptible to solution features (sink holes) allowing surface water to enter the productive aquifers beneath the London Clay (Lambeth Group & Upper Chalk). These features are also known to impact the public water abstractions located to the north of the site.

The proposed site is greenfield and should be free of contamination, however, the potential exists for fly tipping of industrial and domestic waste, which in turn could increase the potential risk of land contamination. We would recommend the applicant conduct at least a phase 1 site investigation to determine any potential environmental risks on site. If any potential risks are identified then further investigation would be required.

Given that the site is located upon a source protection zone 1c/2c, we would recommend consultation with the appropriate water company (Portsmouth Water) to ascertain risk to the aquifer beneath the less productive aquifers. We would also recommend that these discussions should form the basis for a hydrogeological risk assessment which should be submitted for review alongside any planning application.

Advice to applicant

Should the applicant wish us to review any technical documents or want further advice to address any environmental issues, we can do this as part of our charged for service.

Further engagement at the pre-application stage will speed up our formal response to your planning application and provide you with certainty as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

Please do not hesitate to contact me using the contact details shown below should any queries arise from the above response.

Yours sincerely

Suzanne Greenwood
Planning Advisor

