

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	<u>Arun</u> District Council FAO: Ray Cole
FROM:	<u>WSCC</u> - Highways Authority: Tim Townsend
DATE:	16 January 2020
LOCATION:	Land North of <u>Barnham</u> Road <u>Eastergate</u>
SUBJECT:	<u>BN/122/19/EIS</u> <u>Scoping</u> opinion.
DATE OF SITE VISIT:	n/a
RECOMMENDATION:	Advice
S106 CONTRIBUTION TOTAL:	TBA at time of submission of application.

This is the WSCC County Highway Authority (CHA) response to the Scoping Opinion prepared by WYG consultants dated November 2019 submitted for land north of Barnham Road, Barnham, Eastergate, West Sussex.

Comments included within this response about non-highways matters were made by WSP consultants working on-behalf of the Highway Authority for the A29 road alignment scheme (section between Barnham Road and the A29). As such, the case officer should still seek comments for non-highway matters from the relevant Council specialists to establish if further responses are required or are to be forthcoming. And, if not done so already, it is recommended that the LPA should also consult with Highways England as Highway Authority for the nearby A27.

General comments.

The proposed housing development and the A29 realignment are both promoted in the Local Plan and proposed for the same location in Eastergate.

The road scheme and the housing scheme are different types of development and would have some different environmental impacts. Whilst the scope of the EIA does not need to be the same, where impacts/effects are similar coordinating design and mitigation would improve the impacts of both proposed developments. This would reduce the significance of the adverse effects, which is one of the purposes of EIA.

It is also encouraged that counterparts undertaking both EIAs are in regular contact and share information.

WSCC County Highway Authority comments (in-part informed by WSP consultants working on the adjacent A29 re-alignment).

1. Under section 12.4 (paragraph 12.4.2), pages 55 and 56, reference should also be made to a Stage 1 Road Safety Audit and associated Designer's Response for relevant highway infrastructure (as defined by the WSCC Road Safety Audit Policy).

2. The scoping report submitted to inform the scoping opinion states that the housing development is:

"entirely reliant on the realigned A29 being constructed to function as a viable development".

3. This therefore assumes that the A29 realignment functions as a complete mitigation for additional traffic introduced by the housing scheme. On this basis, the housing developers have proposed that traffic and transport is scoped out of the EIA for the housing development, which is subject to the screening opinion.
4. WSCC has mandated in their screening opinion for the A29 realignment EIA, that traffic and transport is scoped in. If traffic and transport is scoped out of the housing site EIA it would therefore be incumbent on promoters of the highways scheme to assess the transport impact of the housing site as part of their EIA.
5. It is considered essential that up-to-date information and the progress of any transport assessment (undertaken outside of EIA) is shared between the housing developer and the WSCC project team and their consultants with regards to junction arrangements, access and alignment. This is to ensure that the A29 realignment effectively integrates the traffic from the housing development.
6. It is highly recommended that the same traffic model is used for both EIAs, which would also be relevant to the noise and air quality assessments.
7. The collaborative model should incorporate the impacts for Phase 1 of the A29 realignment as well as the combination of Phase 1 and Phase 2 for the A29 realignment.

WSP (non-highways) comments.

Ecology and biodiversity.

Mitigating ecological impacts is best considered across the two sites, specifically with regards to habitat fragmentation, foraging and commuting species and areas for biodiversity enhancement.

In particular:

- There would be a large loss of habitat for badgers from both schemes. Fragmentation of badger habitat is best not considered in isolation of the effects of the road scheme. On site mitigation, including a potential replacement sett, will need to be coordinated to be effective. A combined licencing application would also be needed.
- There is likely to be severance to and loss of bat habitat, along with disturbance from lighting and noise as a result of both proposed developments. A combined approach to mitigation, including considering the layout out of the development and the highway together with the housing site would minimise impact to bats from lighting and noise and there may be opportunities to improve navigational features.
- Regarding reptiles, WSCC would be keen to understand and coordinate with the housing developers chosen approach for mitigating impacts on reptiles with that

of the A29 realignment. This would lead to a more comprehensive, effective approach.

- It is likely biodiversity net gain will soon be mandated in law (in the Environment Bill) and is strongly encouraged by current planning policy. Measures to achieve biodiversity net gains on site would also benefit from a combined approach.

Landscape and visual.

- A significant change to the local landscape of Eastergate would occur as a result of both proposed developments. Co-ordinating landscape and visual assessment and landscape design, rather than undertaking an isolated approach, would benefit the place qualities of the developing area, enable a more integrated landscape/townscape to be developed, and reduce the impact of both proposed developments.
- A coordinated landscape design would consider the spatial relationship between the housing layout and the proposed scheme and aim to achieve an interactive and safe space for people and vehicles, with good place qualities.
- Access points, crossings and the linking of the sites should be discussed collaboratively to avoid the two sites becoming separate, which would have adverse landscape, community, and residential amenity impacts.

Noise and vibration.

- It is generally assumed in the A29 EIA that the housing site would consider the proposed A29 realignment with regards to traffic flow, noise and vibration.
- It is therefore assumed the design would mitigate dwellings with glazing and façade treatments to meet the relevant standards, taking account of the proposed highway.
- Collaborating and maintaining discussions about the design and layout would minimise noise and vibration impacts. This should include consideration of the spatial relationship between the housing layout and the A29 realignment, including how the dwellings are positioned relative to the highway.
- It should be noted by the housing developers that noise mitigation should additionally future-proof in both the layout of the scheme and mitigation of the dwellings, the impacts of additional traffic that would be attracted to Phase 1 of the A29 alignment by implementing Phase 2.
- Generally, co-ordinating noise mitigation measures and collaborating on design and layout would reduce the noise and vibration levels associated with both proposed developments.

Water resources, flood risk and drainage.

- The A29 and the residential drainage will be designed separately however the future cumulative impacts on the water environment will be considered in the EIA for all adjacent developments.
- Sharing of design and mitigation information will benefit both schemes to provide insight into drainage for the adjacent site.
- Attenuation pond(s) and swales features provided as part of the A29 realignment would contribute to overall greenspace coverage, benefitting the wider development and place qualities of the area.

Air Quality.

- It is recommended that up-to-date information is shared between the housing developers and the promoters of the highway scheme and their consultants.
- The highway promotor's consultants are gathering baseline diffusion tube information, which can be shared with the housing developers to ensure that consistent information is used as part of both schemes.

Conclusion.

The close proximity of the two proposed developments requires collaborative working on assessment, design, and mitigation, along with aligned EIA's and sharing of information.

This would better-allow adverse environmental impacts of both schemes to be reduced, in line with the aims of EIA.

Tim Townsend
West Sussex County Council – Planning Services