

From: Amanda Scholes on behalf of Planning.Responses
Sent: 03 December 2020 09:14
To: Planning Scanning
Subject: FW: Planning Consultation on: BN/126/20/WS

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Save the environment - think before you print.

From: Joanne Lewis <Joanne.Lewis@arun.gov.uk>
Sent: 01 December 2020 15:53
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/126/20/WS

I refer to the above application and make the following comments on the submitted documents;

Air quality

- Sussex Local Authorities have produced their own guidance on air quality and planning which can be found here <https://sussex-air.net/Reports/SussexAQGuidanceV.12020.pdf> I can not find any reference to this document in the Environmental Statement and it does not appear that an emissions mitigation calculation has been carried out as required.
- Table 6-13 and Figure 6-2 of the report incorrectly shows that ADC have an NO₂ diffusion tube (Bog13) sited at Beechfield Park. This is incorrect, Bog13 is located on Rowan Way at approximate grid reference 493409 101228. This may have an effect on the result of the assessment. Figure 6-2 also appears to show an NO₂ diffusion tube at the Nags Head which is also incorrect.
- As far as I understand it the area immediately to the south of the proposed scheme as shown in Figure 3.1 has been allocated for future residential development. However the air quality assessment does not appear to have identified this area as a potential receptor (Figure 6-4) and as such no modelling of pollutant levels has taken place for these planned new homes.

- Whilst I would not anticipate significant differences in the modelled pollutant levels in this area it is important that they are covered as part of the assessment because should modelled levels be higher than anticipated, mitigation at an early stage will be more effective.

Noise

- I can not see the modelled noise levels within the report or any of the raw data which would usually be submitted in an acoustic report.
- Section 7.6.12 states that the number of properties with potential to qualify under the Noise Insulation Regs has been identified but I can not see which properties these are or what recommendations there would be for increased noise insulation or what noise levels this could achieve.
- Section 7.6.14 sets out the number of properties which will be affected by noise of various levels in the short term and long term scenarios. It also states that in the short term scenario, night time noise levels inside homes will be within the guides set out by BS 8233. There is no similar reference to night levels in the long term scenario despite the number of dwellings affected by an increase in noise greater than 5dB being larger in the future years scenario as shown in tables A7.4.1 and A7.4.2. This should be addressed.
- There is no mention as to whether noise levels during the day will achieve the levels set out in BS 8233 either inside the dwellings or in the outside amenity space at these dwellings. I would like to see that the modelled noise levels for both scenarios meet the levels set out in BS8233 for both day and night times at all properties. If this is not achievable further mitigation should be considered.
- Whilst I appreciate the noise levels are below the SOAEL and the number of affected properties is relatively small a moderate increase in noise at some properties seems to have been discounted as unimportant in the overall noise situation where many dwellings will have an improvement or only a minor increase in noise levels. There does not seem to be any mitigation planned for those properties that are most adversely affected, especially in the long term.

Geology and Soils

The contaminated land specialist has provided the following comments;

Having reviewed Chapter 12 Geology and Soils of WSP's Environmental Statement (ref.: 70060779/Version 1, dated: October 2020), the majority of the content is satisfactory, however, there are some aspects which the applicant/consultant could please confirm:

- sections 12.1.2 and 12.3.6 state that geotechnical ground investigations, including contamination testing, will be undertaken and following this, a more detailed assessment of risk undertaken. Section 12.9.4, however, states that the risk to construction site workers has been categorised as 'low' and section 12.9.5 goes on to state that 'standard mitigation' will be required as part of the CEMP. It is appreciated that the published risk rating is based on previous data; will the risk assessment be updated following the intrusive investigation and remediation measures outlined as required?
- please may the rationale for including the human health risk assessment in the CEMP be explained? The risk assessment doesn't really sit within a CEMP as the contamination element is predominantly a risk assessment and not a management document and whilst there are overlaps, they are formed under separate legislation and codes of practice, etc..

Also, the authors and associated signatures (on the quality control page) seem to be mismatched.

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

Joanne Lewis

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

Sent: 30 October 2020 10:50

To: EHPlanningConsultations <EHPlanningConsultations@arun.gov.uk>

Subject: Planning Consultation on: BN/126/20/WS

To: **Environmental Health - Planning consultation**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/126/20/WS

Registered: 29th October 2020

Site Address: Land to the North of Eastergate and North West of Barnham PO22 0DF

Grid Reference: 495154 105524

Category: West Sussex Cons

Description of Works: Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the construction of a 1.3km single carriageway with a 3m wide shared cycleway/footway, 2.5m wide central island, one uncontrolled pedestrian crossing with a central island to enable users of the PRoW to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and associated works. This application will be determined by West Sussex County Council.

The Council has been consulted on the above application which is being determined by West Sussex County Council. In this case, Arun District Council is acting as a statutory consultee and can only resolve to 'object' or 'not object' or make a comment as the responsibility for making a formal determination rests with the county council.

The documents can be viewed at:

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

[Click here to access West Sussex County Council web site and use search boxes to find the application.](#)

Should you have any comments to make, these should be sent by replying electronically to planning.responses@arun.gov.uk by **13th November 2020**.

Please be aware that any comments you may make will be available to view on our website so please do not insert personal details or signatures on your reply.

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

FLCONREG3 (OD8) 2020