

Mr Peter Cleveland
Henry Adams

Date: 8th February 2021

Your Ref:

Please ask for: Michael Eastham

Our Ref: BN/155/20/EIS

Tel: 01903 737772

Dear Mr Cleveland,

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Scoping opinion for up to 600 residential dwellings and care home.
Land North of Barnham Road Eastergate

Scoping Opinion

I refer to your request made on 21 December 2020 for an opinion as to the scope and level of detail of the information to be provided in an Environmental Statement (ES).

You will have seen the responses to this request from the consultation bodies on the Council's website already. I do not propose to repeat them in full, but they should be read as attachments to this letter. I have attempted to summarise the comments, but they should be read in full because they provide more detail concerning the scope of the Environmental Impact Assessment (EIA) and the content of the ES. The Council's formal scoping opinion is set out below.

Proposal: "Up to 600 dwellings, a dedicated care home and public open space including recreation space and associated infrastructure and works."

Site Address: Land North of Barnham Road, Eastergate

Applicant: Barratt David Wilson

1. Classification of the proposed development and requirement for an Environmental Impact Assessment

1.1. The proposed development falls within Schedule 2, Column 1, part 10(b), as it relates to an urban development project which exceeds the thresholds of 5 hectares and 150 dwellings.

1.2. The Scoping Opinion of Arun District Council is set out below, based on the information provided in the EIA Scoping Report dated December 2020 and following a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) received on 21 December 2020. In providing this response, the Council has consulted the relevant consultation bodies.

2. Location

2.1. The site is located south of Eastergate Lane, east of Fontwell Avenue and north of Barnham Road in the Parish of Barnham and Eastergate. It is approximately 9km east of Chichester and 5km north of Bognor Regis.

3. The Site

3.1. The site comprises an area of approximately 23.389 hectares and is primarily greenfield land. It is irregular in shape and extends from the A29 (Fontwell Avenue) in the west to the B2233 (Barnham Road) in the south.

3.2. The site comprises mainly woodland, scrubland and open space. It is bisected by a public footpath (No. 318), which runs from Eastergate Lane in the north to Barnham Road in the south. The footpath is lined by trees and hedgerows.

3.3. The land to the west of the public footpath comprises woodland, scrubland and small areas of open space. There is a second line of trees and a hedgerow, also running from north to south, along a track approximately 275m west of the public footpath.

3.4. To the east of the public footpath, there is an open field with another track running from north to south in the far east of the site.

3.5. The site is bounded by farmland and open fields to the north. There is a mixture of residential and industrial uses on both sides of Eastergate Lane. The properties on the southern side of Eastergate Lane are within 200m of the site's northern boundary.

3.6. The land to the north-east of the site comprises farmland, housing and associated buildings. A farm containing commercial greenhouses and solar panels is located approximately 200m to the north-east of the site. Ryburn Farm and Stoneyfield Cottages are located approximately 400m to the north-east of the site.

3.7. The eastern boundary of the site is within 50m of houses in Murrell Gardens, Downview Road and Ewen Gardens.

3.8. Fordingbridge Industrial Site adjoins the south-eastern corner of the site and comprises around a dozen buildings.

3.9. A line of houses on the north side of Barnham Road borders the southern boundary of the site.

3.10. An area of woodland is located to the south west of the site, beyond which are more houses on Barnham Road and Fontwell Avenue.

3.11. To the west of the site, there are houses on both sides of Fontwell Avenue. The land beyond Fontwell Avenue primarily comprises farmland, with some of the land in industrial use.

4. The Proposal

4.1. The proposed development is described in paragraph 1.5.1 of the Scoping Report as "up to 600 dwellings, a dedicated care home and public open space including recreation space and associated infrastructure and works".

4.2. The Scoping Report provides additional details, including reference to the fact that the proposed development is entirely dependent on the re-aligned A29 being constructed.

5. Scope of the Environmental Statement

5.1. Every ES must provide a full factual description of the development and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible avoid the use of jargon and be written in plain English.

5.2. Every ES must also contain all of the information set out in Schedule 4 of the EIA Regulations, along with such information as is reasonably required to assess the effects of the project. The ES should therefore contain:

- A full description of the development;
- Measures to avoid/reduce/remedy significant adverse effects;
- Data to identify and assess the main environmental effects;
- An outline of the main alternatives, options and sites considered; and
- A non-technical summary.

5.3. The following sets out Arun District Council's views as to what main/significant areas will need to be considered within a forthcoming ES. It does not prevent Arun District Council from requesting further information at a later stage under Regulation 25 of the EIA Regulations, if deemed necessary.

Air Quality

5.4. The EIA Scoping Report has considered the cumulative impact on air quality from the proposed development and other developments in the locality. The Council's Environmental Health Officer has recommended that the applicant takes into account the Air quality and emissions mitigation guidance for Sussex (2020). The guidance is available to download at: <http://www.sussex-air.net/Consultation/AirQualitydocument.pdf>. It is recommended that Electric Vehicle Charging points are also considered as part of the development.

5.5. The EIA Scoping Report has scoped in a Construction Method Statement to control environmental impacts from construction and makes mention of a Construction Environmental Management Plan; this must include controls for emissions of dust.

Noise and Vibration

5.6. The Council's Environmental Health Officer has advised the proposed approach to noise assessment appears to relate to assessing impact from noise from the development on near sensitive receptors and considers the A29 as a potential noise source. Consideration must also be given to commercial/industrial noise sources surrounding the development and the potential impact on amenities of future residents of the proposed development.

5.7. The Local Highway Authority has assumed (in the A29 EIA) that the housing site would consider the proposed A29 re-alignment with regard to traffic flow, noise and vibration. It has been assumed that the design of the dwellings will feature glazing and façade treatments to meet the relevant standards, taking account of the proposed highway. Collaboration over the design and layout would minimise noise and vibration impacts. This would include consideration of the spatial relationship between the housing and the A29 re-alignment. It should also be noted that noise mitigation measures need to future-proof the impacts of additional traffic that will 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 could reduce the noise and vibration levels associated with both of the proposed developments.

Ecology

5.8. Natural England (NE) has provided detailed comments, which are appended to this Scoping Opinion. These comments include the general principles of what an ES should include (as set out in Schedule 4 of the Regulations). They also refer to the importance of assessments considering the potential cumulative effects of the development with other relevant existing or proposed developments in the area. They advise that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within the ES in accordance with the Guidelines for Ecological Impact Assessment developed by the Chartered Institute of Ecology and Environmental Management (CIEEM). It is noted that the Scoping Report proposes the use of this assessment methodology in accordance with NE's advice.

5.9. NE has advised that the proposal is located outside the buffer area and is therefore unlikely to affect an Internationally or Nationally Designated site. The ES should, nevertheless, thoroughly assess the impact of the proposals on non-statutory sites. The Scoping Report identifies two such sites within 2km, namely Fontwell Park Racecourse and Slindon Woods. There are three other sites within 2km, which contain Ancient Woodland; Stemps Wood (1.1km), West of Hedge End (882m) and Nanny Copse (1.2km).

5.10. The Council's Ecology Advisor is satisfied with the proposed content for the EIA and that it will include:

- Full ecological surveys for the site including phase one habitat surveys and subsequent protected species surveys;
- Full mitigation strategies for any species found on site;
- Consideration and safeguarding of green infrastructure and connectivity across the site (hedgerow and tree connectivity);
- Habitat enhancements on site;
- Assessments of the direct and indirect impacts on protected sites; and
- Impacts from climate change and planning for the future.

Biodiversity Net Gain will need to be considered as part of this development and the applicant will need to demonstrate how this will be achieved, in accordance with Policy ENV DM5 of the Arun Local Plan 2011-2031.

5.11. The Council's Ecology Advisor is satisfied that there is no requirement for botanical and invertebrate surveys given the paucity of the habitats present throughout the site and the fact that the habitats which are of greater ecological value within the site are to be retained (specifically the Lidsey Rife corridor and treelines/hedgerows). It is clear from the extended Phase 1 survey work that the site is not of significance in terms of habitats or opportunities for protected and notable invertebrates species / assemblages.

5.12. There would be a large loss of habitat for badgers from both the A29 re-alignment and the proposed housing. 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 required.

5.13. There is likely to be severance to and loss of bat habitat too, 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 housing development and the highway together would minimise the impact on bats from lighting and noise and there could be opportunities to improve navigational features.

5.14. Similarly, the Council's Ecology Advisor is keen to understand the housing developer's proposed approach for mitigating impacts on reptiles and to co-ordinate that with the A29 re-alignment.

5.15. Measures to achieve biodiversity net gains on site would also benefit from a combined approach.

Landscape and Visual Impact

5.16. Natural England has provided advice on the scope of the ES in relation to Landscape and Visual Impacts. It is noted that the location of viewpoints for the assessment of visual effects have already been agreed with the Council's Landscape Officer.

5.17. A significant change to the local landscape will occur as a result of both proposed developments (i.e. re-alignment of the A29 and the proposed housing). Co-ordinating the landscape and visual assessment and landscape design, rather than undertaking an isolated approach, would benefit the place qualities, enable a more integrated landscape/townscape to be developed, and reduce the impact of both proposed developments. A co-ordinated landscape design would consider the spatial relationship between the housing layout and the proposed road 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 being treated separately, which would have adverse landscape, community, and residential amenity impacts.

5.18. A Landscape and Visual Impact Assessment is required with surrounding viewpoints to be agreed and assessed from public footpaths within and beyond the site. The landscape assessment should include photomontages including long sightlines to assist with the assessment of height and massing, as well as summer and winter views; encompassing the significant views to and from the South Downs National Park. The potential impact on the location would require that landscaping be provided as mitigation towards screening and softening the development.

5.19. The EIA should include a full assessment of the potential impacts of the development on local character. A Local Character Assessment should be undertaken and used as the basis for guiding, informing and understanding the ability of the location to accommodate change and to inform positive proposals for conserving, enhancing and regenerating character as the detailed proposals are developed.

Water Resources, Flood Risk and Drainage

5.20. The Environment Agency is pleased that the water environment has been scoped into the EIA. It recommends 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 2011-2031. 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.

5.21. The site lies within Flood Zone 1. However, due to the size of the site, a Flood Risk Assessment (FRA) will need to be submitted, as referenced in the Scoping Report. The FRA will be assessed by West Sussex Council as the Lead Local Flood Authority (LLFA). It is recommended that consultation is undertaken with this authority on specific requirements for the FRA and the ES

5.22. West Sussex County Council, as the Lead Local Flood Authority, has advised that the majority of the site is at low risk from surface water flooding but is at high risk from groundwater flooding.

5.23. Reference should be made to the Lead Local Flood Authority's guide for master planning sustainable drainage into developments 'Water. People. Places.' https://www.westsussex.gov.uk/media/2270/suds_design_guidance.pdf along with the West Sussex LLFA Policy for the Management of Surface Water https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf.

5.24. Southern Water has advised that there are no public surface water sewers located within the vicinity of the site and alternative methods of disposing surface water should be investigated (e.g. soakaway, ditches or local water courses). Due to the surface water inundation issues in the Lidsey Catchment the developer should look to protect the public sewerage system from inundation and infiltration, which contribute to flooding in unfavourable conditions.

5.25. Arun District Council's Drainage Officers have advised that the hierarchy for sustainable drainage must be followed with infiltration fully investigated. Winter infiltration testing and winter groundwater monitoring must be undertaken. The applicant is advised to discuss the extent of this monitoring with officers at the earliest opportunity. Infiltration tests must be carried out in accordance with BRE356, CIRIA R156 or a similar approved method and cater for the 1 in 10-year storm between the invert of the entry pipe to the soakaway and the base of the structure. It must also have provision to ensure that there is a capacity in the system to contain below ground level the 1 in 100-year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location.

5.26. If on-site infiltration is not possible, drainage via a restricted discharge to a suitable local watercourse may be acceptable. Any discharge should be restricted to 1-year greenfield run-off rates, with a minimum rate of 2 l/s.

5.27. It is suggested that, at the earliest stage, the developer gives due consideration to the appropriate location and design of surface water drainage features to achieve the necessary capacity, water quality (via the SuDS management/treatment train), as well as ease of on-going maintenance. Surface water drainage features should also be designed in a manner that positively affects the amenity of the site. Open features, such as swales, basins and ponds, when designed correctly, can satisfy all the above aspirations as well as being easier to maintain, having longer lifespans and offering ecological advantages over subterranean features such as "plastic crate systems".

5.28. Adequate treatment of surface water must be ensured prior to discharge.

5.29. Supplementary guidance notes regarding surface drainage are located at: www.arun.gov.uk/surfacewater.

5.30. While drainage for the A29 re-alignment and the proposed housing is likely to be designed separately, the future cumulative impacts on the water environment will need to be considered in the EIA for all adjacent developments.

5.31. The County Council, as the Fire and Rescue Service, has requested that provision is made for fire hydrants to serve the new development.

5.32. In relation to foul drainage, Southern Water has advised that, due to the size of the development and to protect premises from the impact of sewage flooding, an assessment is required to ascertain an appropriate point of connection to the foul drainage network. A formal application will need to be made by the applicant or developer to Southern Water for a connection to be made to the public foul sewer.

5.33. The cumulative impact of additional foul water flows from the proposed development and from other parts of the strategic housing allocation may necessitate reinforcement of the public sewer network. In such circumstances, Southern Water and the applicant will need to work together to review whether delivery of the network reinforcement aligns with the proposed occupation of the development, as it is likely to take time to design and deliver any such reinforcement.

5.34. If the above matters are included within the relevant sections of the ES then the Scope is agreed as set out in the Scoping Report.

Climate Change

5.35. "Climate change is one of the biggest challenges facing the District as it will impact upon all local communities and businesses in the District, in particular through increased flood risk, declining water availability and increased health problems for those vulnerable to extreme temperatures." (Arun Local Plan 2011-2031, para. 13.5.1) Policy ECC SP1 states that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change.

5.36. The proposed chapter dealing with climate change is agreed as set out in the Scoping Report.

Traffic and Transport

5.37. Highways England has noted that Traffic and Transport has been scoped out and a Transport Assessment will be prepared to support the planning application for the site and appended to the ES. It is expected that the relevant parts of the ES will reflect the Transport Assessment, including Air Quality and Noise and Vibration issues associated with traffic generation and the Strategic Road Network. It has also been noted that a Construction Traffic Management Plan will be prepared to mitigate the construction impacts of the proposed development.

5.38. West Sussex County Council, as the Local Highway Authority, has commented generally that the proposed housing development and the A29 re-alignment are both promoted in the Local Plan and proposed for the same location. 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 the impacts/effects are similar coordinating design and mitigation would improve both proposed developments. This would reduce the significance of the adverse effects, which is one of the purposes of EIA.

5.39. The scoping report (paragraph 12.6.3) states that the housing development is "entirely reliant on the realigned A29 being constructed to function as a viable development". It assumes that the A29 re-alignment functions as a complete mitigation for the additional traffic generated by the housing scheme. On this basis, it has been proposed that traffic and transport is scoped out of the EIA for the housing development. The County Council has stipulated, for the A29 re-alignment EIA, that traffic and transport is scoped in. If traffic and transport is scoped out of the housing site EIA it would be incumbent on promoters of the highway scheme to assess the transport impact of the housing site as part of their EIA.

5.40. It is considered essential that up-to-date information and the progress of any transport assessment (undertaken outside of an EIA) is shared between the housing developer and the County Council's project team and their consultants regarding junction arrangements, access and alignment. This is to ensure that the A29 re-alignment effectively absorbs the traffic from the housing development. It is highly recommended that the same traffic model is used for both EIAs, which would also be relevant to the air quality and noise assessments. The collaborative model should incorporate the impacts for Phase 1 of the A29 re-alignment as well as the combination of Phase 1 and Phase 2 for the A29 re-alignment.

5.41. West Sussex County Council, as the Local Highway Authority, has requested that the information in Table 3.3 (Matrix 1) on page 12 of the scoping report be corrected. Reference is made to a planning application for the northern part of the new A29 not being submitted. This statement is now out of date as planning application WSCC/052/20 was submitted in October 2020 and is currently undetermined. As reference to the A29 (northern section) application was incorrect, the applicant should check all other entries in Table 3.3 are correct and up to date. The reference to the A29 (northern section) application in paragraph 12.3.2 is out of date and needs updating.

5.42. The proposed development has the potential to lead to impacts on railway stations and level crossings. Therefore, it is requested that the ES, or Transport Assessment includes:

- Information about the potential increase/decrease in railway journeys to and from Barnham Railway Station, particularly at peak travel times; and
- Information about the potential increase or decrease in vehicular and non-vehicular use of level crossings in the area, particularly during peak travel times.

5.43. For the reasons set out above, it would be preferable for Traffic and Transport to be included in the scope of the ES.

Access, Recreation and Green Infrastructure

5.44. Natural England has commented that the ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. Appropriate mitigation measures should be incorporated for any adverse impacts. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Natural England recommend reference be made to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate, for example, the Bognor Regis GI Framework - A Landscape & Green Infrastructure Framework Connecting Bognor Regis to the South Downs National Park, which was endorsed by the Council's Panning Policy Sub-Committee at its meeting held on 25 February 2020.

5.45. Policy GI SP1 of the Arun Local Plan 2011-2031 requires all major development to be designed to protect and enhance existing green infrastructure assets, and the connections between them, in order to ensure a joined up green infrastructure network. Development proposals must identify opportunities to connect existing green infrastructure assets with the coast, the South Downs National Park or to the District's inland villages. A key part of the strategy is to link coastal communities with the South Downs National Park.

5.46. Given the location of the site and its existing characteristics, access, recreation and green infrastructure should be included in the scope of the ES. The retention and re-instatement of existing footpaths and the creation and incorporation of new footways and cycleways to create links; and the site's urban fringes should be designed to promote the creation of a wider green infrastructure.

5.47. Quality, well-designed public open space is a requirement of Arun District Council's Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD, January 2020. Consideration should be made to the siting of open space and buffer areas and their use in integrating the site with the existing residential developments adjacent to the site.

Ground Conditions, Agriculture, Soils and Contamination

5.48. The Scoping Report (at paragraph 13.2.5) states that "An Agricultural Land Classification shows the site is located in an area which is predominantly Grade 1 agricultural land". Therefore, this chapter of the ES should consider the impacts of the proposal on the protection of the best and most versatile agricultural land (as set out in paragraph 170(b) of the National Planning Policy Framework). The ES should also demonstrate how the criteria in Policy SO DM1 of the Arun Local Plan 2011-2031 can be addressed.

5.49. Natural England has stated: "Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around

the development as result of construction activities. This affects their functionality as wildlife habitat and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution." Attention is drawn to a Code of Practice for the sustainable use of soils on construction sites (2009), published by Defra (<https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

5.50. The Environment Agency notes that the site has been identified as agricultural land and as such, the risk of gross contamination is negligible. The Environment Agency would expect at least a phase 1 desktop study/site walkover to be conducted to rule out any areas that may be affected by unexpected contamination (the proximity to old landfill sites needs to be considered), as well as identifying any hitherto unknown pathways (such as old boreholes or soakaways). The Agency would also expect the applicant to develop a strategy/procedure to deal with any unexpected contamination encountered during the construction phase of the proposed development.

5.51. The Scoping Report has made consideration for contaminated land. Whilst the report does not identify the need for a remediation strategy, the Council's Environmental Health Officer advises that a contamination watching brief should be implemented which would require works to cease if unexpected contamination was discovered, a remediation strategy to be submitted and approved in writing to the Local Planning Authority, followed by a verification report confirming effectiveness.

5.52. The site of the proposed development is located in proximity to an SPZ 1 associated with the Fontwell public water abstraction (Portsmouth Water). The abstraction is from the Chalk (Principal aquifer) which is overlain by the Lambeth Group (Secondary A aquifer) and London Clay (Unproductive aquifer) respectively (the site is underlain by London Clay) with sporadic superficial deposits (secondary aquifer) in the vicinity (the site is underlain by River Terrace Deposits). Whilst it would appear that the London Clay would provide suitable mitigation for vertical migration of contaminants, the applicant should note that the thickness and heterogeneity of this formation varies in certain areas.

5.53. The construction phase of the project also presents a potential risk to groundwater with any penetrative foundation works potentially providing pathways for contaminated material to sensitive groundwater. There is also the potential for this activity to cause turbidity which could compromise the integrity of local drinking water supplies.

5.54. The Environment Agency has commented that there is no information regarding the use of SuDS or soakaways for surface water drainage. Whilst the use of SuDS is encouraged, the viability of soakaways in this area is questionable. The use of soakaways may allow direct surface run off to be discharged into a principal aquifer, which the Environment Agency could not support.

5.55. With regards to clean roof water, the Environment Agency has no objection to this being discharged to ground. However, surface water drainage from car parking areas and roads has the potential to contain pollutants and hazardous substances. The Environment Agency would expect a risk assessment to be carried out to determine the level of treatment required prior to the water from these areas being discharged to ground. The developer is directed to the Ciria SuDs manual C753 where industry best practice is provided. It provides further information and guidance on risk assessment and the likely level of treatment needed for such sites. This can be found at <http://www.susdrain.org/>.

5.56. The applicant should also be aware of the prevalence of solution features in the area. These features not only provide preferential flow pathways for surface run off to rapidly enter the Chalk, but also enable the rapid and erratic flow of groundwater in the area. This mechanism has been noted as

active in this area and directly affects local groundwater abstractions.

5.57. Therefore, the Environment Agency would expect the applicant to submit a thorough hydrogeological risk assessment, foundation works risk assessment and drainage strategy. All these documents should consider the sensitivity of groundwater in the area.

5.58. In light of the above, it would be preferable for Ground Conditions, Agriculture, Soils and Contamination to be included in the scope of the ES.

Archaeology and Cultural Heritage

5.59. The Scoping Report notes that there is no clear evidence for archaeological remains within the site (paragraph 14.2.4), but that any buried heritage assets have the potential to be adversely impacted by the construction activities (paragraph 14.5.1). Historic England considers that the lack of evidence of archaeology is in this case, most likely to be due to a lack of previous investigation, rather than there not being archaeology present. The site lies broadly within the West Sussex Coastal Plain and it is possible that there could therefore be archaeology present from a range of periods. The archaeological potential of the area would be characterised better through diligent desk-based assessment. The Scoping Report concludes that 'identified effects' on archaeology (as a result of the development) can be mitigated through further investigation, and that effects on archaeology are considered to be limited and unlikely to result in significant effects (paragraph 14.6). Historic England does not agree with this conclusion.

5.60. Should archaeological features be identified within the development area, the impact on them from construction activities could be of a high enough magnitude to result in their total destruction (i.e. very significant effects). Should archaeology of high importance be identified, there would be a requirement for avoidance of harm, which might translate as preservation of archaeological features or deposits in situ, rather than through archaeological investigation (mitigation for their destruction).

5.61. Paragraph 199 of the NPPF supports this, noting that the ability to record evidence of the past should not be a factor in deciding whether such loss should be permitted. Paragraph 184 of the NPPF also tells us that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

5.62. Historic England has recommended that Archaeology is scoped in and assessed in accordance with national and local policy guidance. The archaeological potential of the site is currently unknown, as no baseline assessment has been provided, and as such the projected impacts of the development cannot be adequately assessed. The ES should contain a detailed archaeological desk-based review to inform understanding of significance and impacts from the proposed development.

5.63. The District Council's Archaeology Advisor agreed that it would be prudent for the ES to contain a consideration of the general potential of the area, not least as a guideline to the mitigation measures that could be required.

5.64. The District Council's Principal Conservation Officer noted that paragraph 14.2.1 of the Scoping Report stated that there are no conservation areas within 1km of the site. However, the two nearest Conservation Areas are Eastergate Square and Eastergate (Church Lane), both of which appear to be within 1km of the site. This should be confirmed.

5.65. The baseline cultural heritage assessment should include an assessment of the significance of any heritage assets identified, as well as an assessment of the impact of the proposed development upon these assets.

Lighting

5.66. The Council's Environmental Health Officer has advised that a report should be produced to cover the potential light pollution from the site, particularly with regard the South Downs Dark Sky Reserve designation. This type of report could be submitted with the planning application alongside the ES.

Items falling outside the scope of the Environmental Statement

5.67. There were no items falling outside the scope of the Environmental Statement.

6. Other Comments

6.1. Barnham and Eastergate Parish Council considers that there are inadequate existing facilities including 5 GP surgeries within 5km, and two secondary schools to accommodate the level of growth anticipated at BEW. It may be that existing facilities could somehow cope with the potential influx of 1500 or so people in this development but when all the proposed developments in the (BEW) strategic site are planning to utilise the same infrastructure then it is clear that the impact is potentially overwhelming.

I trust that the above provides you with sufficient information on the requirements for the Environmental Statement. However, should you require any further clarification, please do not hesitate to contact me.

Yours sincerely



Neil Crowther
Group Head of Planning