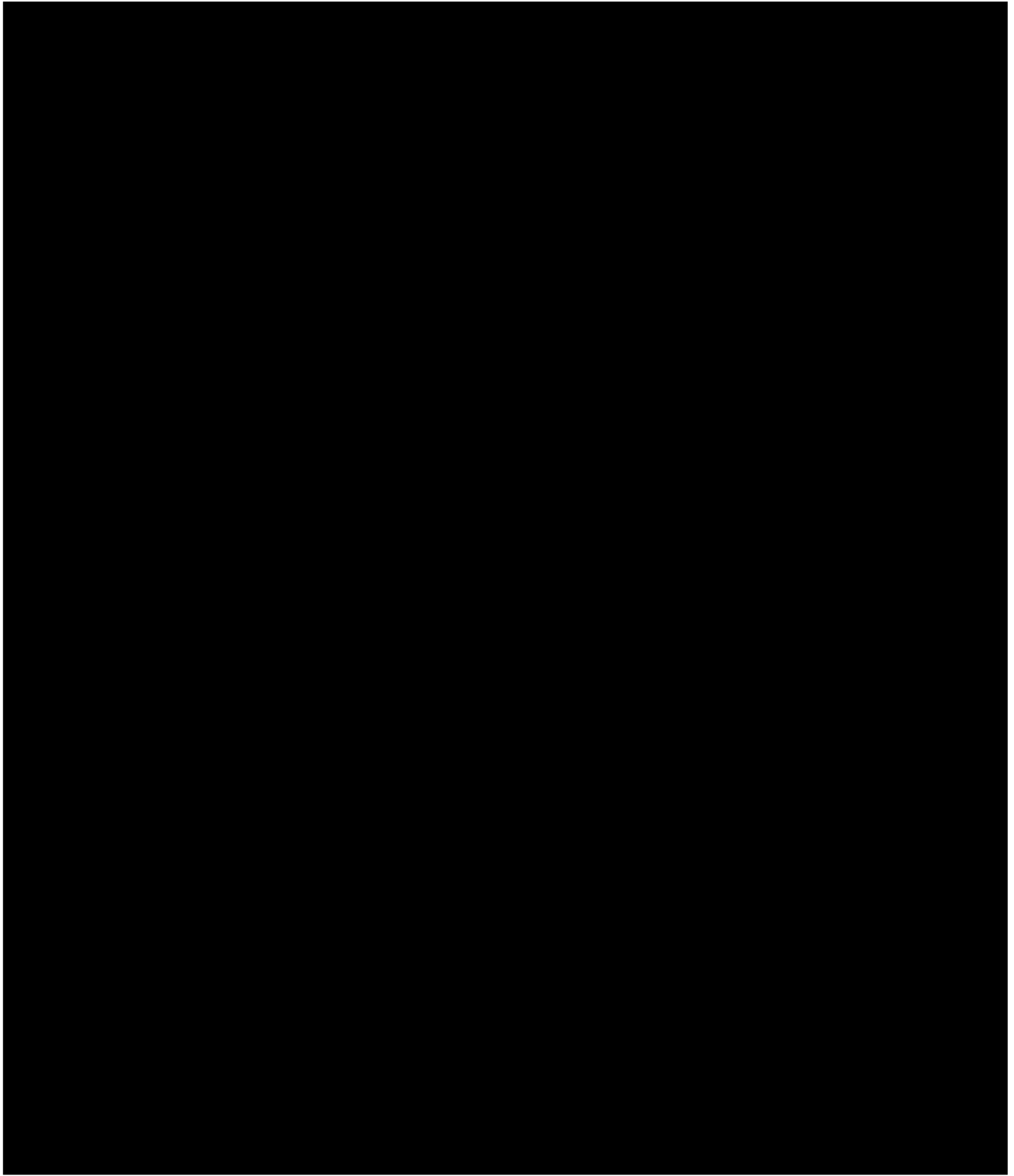




From: Anita Gardner <Anita.Gardner@arun.gov.uk>

Sent: 13 April 2022 10:10

To: Nicola Spencer <Nicola.Spencer@arun.gov.uk>

Subject: FW: EIA Screening Opinion Request - Land North of Littlehampton Academy, Littlehampton, BN17 6FE

Can this be made into a screening opinion app please?

Anita Gardner

Principal Planner

T: 01903 737529

E: anita.gardner@arun.gov.uk

Arun District Council, Civic Centre, Malltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



From: Victoria Mason [REDACTED]

Sent: 06 April 2022 16:58

To: Anita Gardner <Anita.Gardner@arun.gov.uk>

Cc: Aisling Webb [REDACTED] Matthew Small [REDACTED]

Subject: EIA Screening Opinion Request - Land North of Littlehampton Academy, Littlehampton, BN17 6FE

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Dear Anita,

I write on behalf of West Sussex Property Development LLP to request an Environmental Impact Assessment (EIA) Screening Opinion in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) from Arun District Council, with regard to the development of the Land North of Littlehampton Academy, Littlehampton, BN17 6FE.

We would be grateful if you could confirm safe receipt of this request.

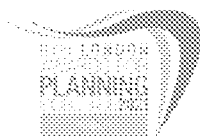
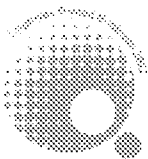
In accordance with Regulation 6 of the EIA Regulations, the attached request contains:

- A plan sufficient to identify the Site;
- A description of the development, including physical characteristics of the development and, where relevant, of demolition works;
- A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the development;
- A description of the likely significant effects of the proposed development on the environment resulting from expected residues and emissions and the production of waste, where relevant; and the use of natural resources, in particular soil, land, water and biodiversity; and
- Measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

We look forward to receiving your response within the statutory timeframe as set out in the EIA Regulations. If you have any queries in the meantime, please do not hesitate to contact me.

Kind Regards,

Victoria Mason



Victoria Mason
Assistant Consultant
[REDACTED]

[REDACTED]
www.quod.com

8-14 Meard Street
London
W1F 0EQ

Disclaimer

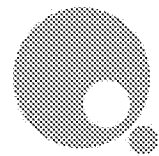
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Our ref: Q210744.EIA Screening.F
Email: [REDACTED]
Date: March 2022



Anita Gardner
Principal Planning Officer
Arun District Council
1 Maltravers Road
Littlehampton
BN17 5LF

By email

Dear Anita

Land North of Littlehampton Academy, Littlehampton, BN17 6FE

Request for an EIA Screening Opinion under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Regulation 6

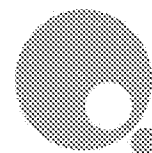
West Sussex Property Development LLP (a Joint Venture between West Sussex County Council and Lovell Partnerships) ('Applicant') intends to submit a full planning application to redevelop the Land North of Littlehampton Academy, Littlehampton, BN17 6FE ('Site') to deliver a residential development ('Development'). On behalf of the Applicant, we write to request an Environmental Impact Assessment ('EIA') Screening Opinion from Arun District Council ('Arun DC') in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended²) ('EIA Regulations').

To assist Arun DC in its adoption of a Screening Opinion, we enclose figures at Annex 1 and an EIA Screening Appraisal at Annex 2 which satisfy Regulation 6(2) as follows:

- A plan sufficient to identify the Site;
- A description of the Development, including physical characteristics of the Development and, where relevant, of demolition works;
- A description of the location of the Development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the Development;

¹ Her Majesty's Stationary Office (HMSO), 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. May 2017.

² HMSO, 2018. The Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. November 2018.



- A description of the likely significant effects of the Development on the environment resulting from expected residues and emissions and the production of waste, where relevant; and the use of natural resources, in particular soil, land, water and biodiversity; and
- Measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Existing Site and Setting

The Site is located in Littlehampton, approximately 1km north east of Littlehampton town centre. The Site is accessible by the Fitzalan Link Road, which opened to traffic in December 2021 and connects to the A259 Worthing Road approximately 80m north of the Site. The Site is an approximate u-shape parcel of land which extends to approximately 6.6 hectares ('ha'). It comprises undeveloped grassland. A Site boundary plan is provided in Annex 1 (Figure 2).

The Site is bound by Cornfield School to the north west, a recently approved residential development (currently under construction) to the north, residential properties to the north and east, grass sports pitches associated with Littlehampton Academy to the south and the Fitzalan Link Road to the west. Annex 2 provides a more detailed description of the Site and surrounds.

Planning Context

The central and western parts of the Site are together identified as a Housing Site within the adopted Local Plan. Further detail is provided within Policy 4 (Housing Site Allocations) of the Littlehampton Neighbourhood Plan which allocates the central and western parts of the Site for approximately 100 dwellings, comprising primarily 2, 3 and 4 bedroom houses, to be delivered in the period 2020-2029, subject to the provision of a new open space on land adjacent to Oakcroft Gardens.

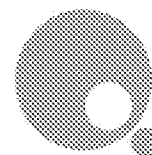
In addition to the housing allocation, the eastern part of the Site is identified as a Green Infrastructure Asset in the Littlehampton Neighbourhood Plan. Figures 1a and 1b in Annex 1 show the Local Plan and Neighbourhood Plan policy allocations.

Description of Development

The proposals are not yet fixed and are subject to ongoing design development. The Applicant is intending to submit a full planning permission for the delivery of approximately 110 new homes over approximately 4.2ha of the Site. The Development will also include a linked network of open green spaces and a carefully considered landscape strategy. An area of green space will make up the remainder of the Site. The Development will also provide supporting infrastructure, including car and cycle parking and open space.

EIA Context

The Development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations, and is therefore not a 'Schedule 1 development'. The proposals do fall within Category 10(b) of Schedule 2 of the EIA Regulations, which is applicable to 'urban development



projects'. Schedule 2 development means development of a description referred to in Column 1 of the table in Schedule 2 where:

"a) Any part of that development is to be carried out in a sensitive area; or

b) Any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development."

No part of the Development is to be carried out in a 'sensitive area' as defined in Part 1 of the EIA Regulations (i.e. a Site of Special Scientific Interest, National Park, Area of Outstanding Natural Beauty, World Heritage Site, Scheduled Monument or European Site). The thresholds for Category 10(b) projects is:

"(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or

(ii) the development includes more than 150 dwellings; or

(iii) the overall area of the development exceeds 5 hectares."

The Site area is above this threshold and therefore EIA screening is required.

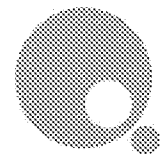
Potential for Likely Significant Effects

The Government's online EIA guidance³ for considering Schedule 2 development and the need for EIA states, *"Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment"* (Paragraph 018). The key stage in the screening process is to consider whether the Development is *"likely to have significant effects on the environment by virtue of factors such as nature, size or location"*. As required by Regulation 5(4)(c), where a relevant planning authority has to decide whether Schedule 2 development is EIA development, they must take into account the relevant selection criteria set out in Schedule 3.

Whilst the whole Site extends to 6.6ha, the built development area only extends to 4.2ha. It should be noted that this is below the category 10(b) screening thresholds, and therefore it is not anticipated that an EIA will be required.

However, given the total Site area is above the Schedule 2 10(a) threshold, an EIA Screening Appraisal has been undertaken (see Annex 2) which has considered the characteristics of the Development, including the potential for cumulative effects with other existing and approved developments.

³ Ministry of Housing, Communities and Local Government, 2020. Environmental Impact Assessment: Guidance. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>



Based on the findings of our Screening Appraisal, we find that the Development is unlikely to give rise to significant environmental effects and, as such, does not constitute an EIA development. However, we request Arun DC's Screening Opinion.

Mitigation Measures

The EIA Regulations allow mitigation measures, that would avoid or prevent what might otherwise have been significant adverse environmental effects, to be taken into account by the decision maker when considering whether a development is an EIA development. A summary of standard mitigation measures considered appropriate to mitigate effects with respect to this Development is provided below.

Construction

- Good practice construction methods; and
- A Construction Method Statement, to be approved via a planning condition.

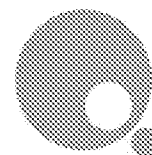
Design

- Design which positively contributes to pedestrian and cyclist accessibility (as detailed in the Design and Access Statement (DAS) to support the planning application in due course);
- Design providing public open space (as detailed in the DAS);
- Adherence to a Travel Plan;
- Surface Water Drainage Statement (to be submitted with planning application) including Sustainable Urban Drainage features (SuDS); and
- Landscaping Strategy outlining measures to improve landscape amenity and achieve Biodiversity Net Gain.

Conclusion and Screening Opinion Request

Based on the findings of our Screening Appraisal (Annex 2), we find that the Development is unlikely to give rise to significant environmental effects alone or in cumulation with other existing, approved or known forthcoming schemes and, as such, does not constitute an EIA development. However, we request Arun DC's Screening Opinion.

As you will be aware, Regulation 5(5) requires that in their screening opinion, the local authority should state: *'the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3'*. We would be grateful if you could confirm receipt of this request and therefore the start date for the 21-day decision period and that you are satisfied you have sufficient information to make your screening opinion. Should you require any further information in order to prepare your screening opinion and reasons for your decision, please do not hesitate to contact me.



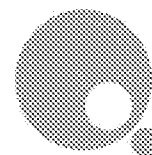
Yours sincerely,



Aisling Webb
Director

Encl. Annexes 1 and 2

cc. Matthew Small, Quod
Ben Weller, West Sussex Property Development LLP
Leanne Smith, West Sussex Property Development LLP



ANNEX 1

Figures

Figure 1a: Local Plan Proposals Map Extract

Figure 1b: Littlehampton Neighbourhood Plan Green Infrastructure Extract

Figure 2: Site Boundary Plan

Figure 3: Environmental Sensitivities

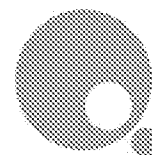


Figure 1a: Local Plan Proposals Map Extract

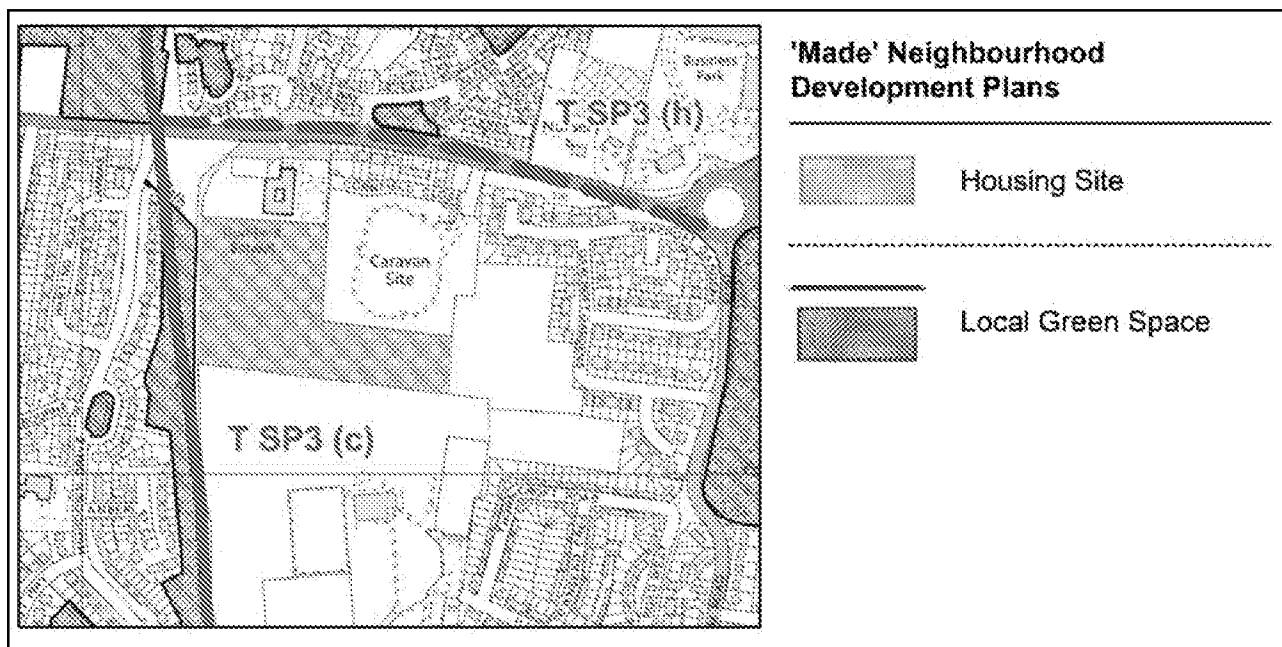
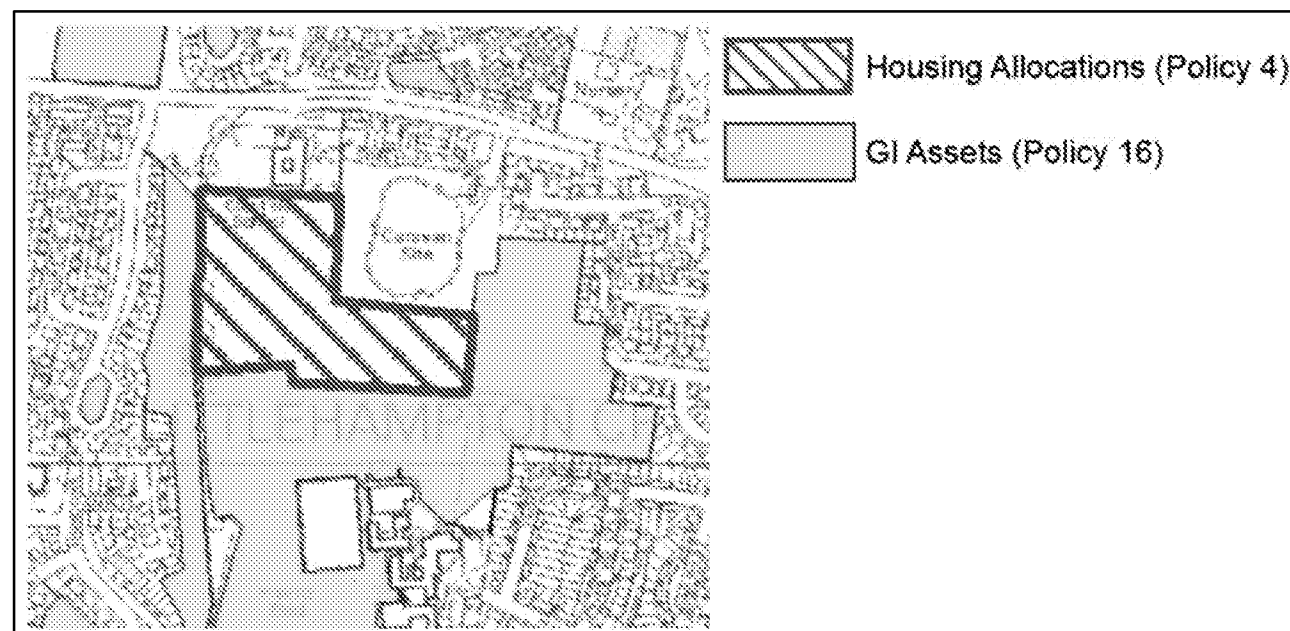


Figure 1b: Littlehampton Neighbourhood Plan Green Infrastructure Extract



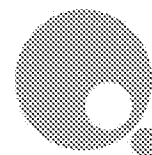


Figure 2: Indicative Site Boundary Plan



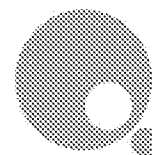


Figure 3: Environmental Sensitivities



Legend

- | | | |
|--------------------------|----------------------------------|------------------|
| 1km Buffer | Archaeological Notification Area | Flood Zone 3 |
| Indicative Site Boundary | Local Nature Reserves | Listed Buildings |
| Extent of On-Site TPO | Conservation Areas | I |
| Historic Landfill Sites | OSOI | II |
| Littlehampton Cemetery | Ancient Woodland | II* |
| Scheduled Monuments | Flood Zone 2 | |

Site Sensitivities

0 0.25 0.5 km

Scale: 1:20,000 A4 February 2021

On-site data © Crown copyright and database right 2014

9-14 Seaward Street

Littlehampton

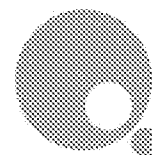
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ANNEX 2

EIA Screening Appraisal: Land North of Littlehampton Academy

Schedule 3 of the EIA Regulations sets out selection criteria that should be considered, including the characteristics of the development, its location, the type and characteristics of the potential impacts and the possibility of effectively reducing the impact. This Annex provides an appraisal of the Development with reference to these criteria.

a. Site Location and Description

The Site covers an area of 6.6ha and is centred at National Grid Reference TQ 03358 03129. It is located within the town of Littlehampton, north of Littlehampton Academy and south of Cornfield School. The Site is approximately 1 km north east of Littlehampton town centre. The Site lies within the administrative area of Arun District Council (Arun DC).

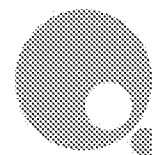
The Site comprises a U-shaped piece of undeveloped grassland.. There are a number of scattered trees within the Site boundary and many are adjacent to the northern boundary of the Site. The trees located within the east of the Site are subject to a group Tree Protection Order (TPO). No built structures are located on the Site.

The Site is bound by Cornfield School to the north west, a recently approved housing development comprising 72 new homes (Planning Ref. LU/330/18/PL) (currently under construction) to the north and north east, residential properties off Oakcroft Gardens to the east, grass sports pitches associated with Littlehampton Academy to the south and by the Fitzalan Link Road to the west.

Access to the Site will be gained from the Fitzalan Link Road. The Fitzalan Link Road connects to the A259 Worthing Road approximately 90m north of the northern boundary of the Site. Littlehampton Train Station is located approximately 1.1km south west of the Site. Littlehampton Train Station is served by Southern Rail and Thameslink services and provides services to London Bridge, Portsmouth and Bognor Regis. The closest bus stops to the Site are situated approximately 200m east of the Site on the B2187. The bus stops are served by the 700 Coastliner service which runs between Brighton and Wick.

Environmental Sensitivities

The Site is not located within a 'sensitive area' (as defined in Part 1 of the EIA Regulations) (i.e. a Site of Special Scientific Interest, National Park, Area of Outstanding Natural Beauty, World Heritage Site,



Scheduled Monument or National Site Network Site⁴) and is not subject to any statutory or non-statutory designations for nature conservation or heritage. A group TPO has been issued for the trees located within the east of the Site.

The closest heritage assets to the Site are the Grade II listed Toddington House Stables and Barn Garden Shed located approximately 480m north of the Site on Toddington Lane and the Grade II listed cottages 'Leila Cottage' and 'The Old Cottage' located on the A284, approximately 480m and 500m west of the Site. There are a number of further Grade II listed structures to the south west of the Site within the Littlehampton (East Street) Conservation Area, situated 80m south west of the Site. The Site is wholly located within a category amber Archaeological Notification Area (ANA) that is associated with the former Toddington Nurseries and surrounding area.

The closest designated site for nature conservation is the Climping Beach Site of Special Scientific Interest (SSSI), the eastern part of which is also designated as the West Beach Local Nature Reserve (LNR). The Climping Beach SSSI is located approximately 1.8km south west of the Site at its nearest point.

The Site is located within Flood Zone 1. The River Arun lies approximately 1.3km south west of the Site at its closest point. A small pocket of the Site is identified as being at low risk from surface water flooding, the remaining area is at very low risk.

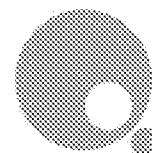
The closest sensitive receptors are the adjacent Cornfield School and Littlehampton Academy and sports fields, located to the north west and south of the Site, respectively. There are also residential properties adjacent to the north eastern and eastern boundaries of the Site and an approved residential development (Planning Ref. LU/330/18/PL) on Land South of Cornfield Close ('Land South of Cornfield Close development') is currently under construction adjacent to the north of the Site. Littlehampton Cemetery is situated approximately 100m east of the Site at its closest point.

b. Size and Design of the Development

The Applicant is seeking full planning permission for the redevelopment of the Site. The proposals are not yet fixed and are subject to ongoing design development and consultation with Arun DC, key stakeholders and the public. However, the Development is likely to comprise:

- Redevelopment of the Site comprising approximately 110 new residential dwellings (mix of houses and flats);
- Supporting car and cycle parking infrastructure; and
- Associated hard and soft landscaping works providing a linked network of open green spaces, including green space that can be accessed by the public.

⁴ The National Site Network sites, formally known as European Sites, include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).



Based on an estimated commencement of works in May 2023, the construction works are anticipated to be undertaken over 29 months, with completion targeted for October 2025.

c. Use of Natural Resources and Production of Waste

Development of the Site would, by its very nature, require the use of a range of natural and man-made construction materials to complete the build and fit-out of the scheme.

Any earthworks required to facilitate future development of the Site would generate some waste. Re-use of surplus material will be dependent on it meeting relevant specification requirements and being inert and not contaminated. Opportunities to minimise volumes of waste going to landfill would be sought by the contractors in-line with good site practice, so that construction materials are used efficiently on-site and that wastes are recovered, re-used or recycled where practicable. The use of natural materials such as ply and timber will be kept to a minimum. The removal of wastes during the construction phase may lead to some indirect localised temporary effects, e.g. disruption on the road network for other road users, dust and noise, but is not considered to be significant.

It is expected that the operational consumption of energy, water and other natural resources by the Development will be in keeping with similar residential-led developments. It is not expected to result in significant energy usage or water intensive activities and will be managed appropriately through design and consultation with the statutory utility providers to avoid any adverse impacts on their capacity to provide services. Therefore, it is considered unlikely that the Development will result in significant effects relating to the use of natural resources.

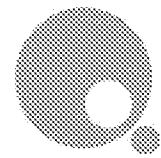
The completed Development would generate various waste streams, none of which would be hazardous or likely to give rise to significant effects. The Development will provide the necessary waste requirements based on BS 5095: 2005 and in line with Arun DC's waste and recycling storage requirements. The waste strategy for the Development will be described in the planning application supporting documentation.

Overall, it is expected that the operational consumption of energy, water and other natural resources by the Development will be in keeping with similar residential-led developments and would not be significant.

d. Socio-Economics and Human Health

During construction, the Development is likely to result in indirect and induced employment opportunities, as well as spending by the construction workforce in the local area. However, due to the size of the Development this would be a temporary beneficial effect and is not considered significant.

The Development will contribute towards Arun DC's aspirations of providing 20,000 new homes within the District, as set out in Local Plan Policy H SP1 (The Housing Requirement). In the context of the region, the provision of new homes is beneficial in contributing towards meeting local housing requirements (particularly in the context of Arun DC's recent housing supply and delivery underperformance), although it is not considered to be significant in EIA terms.



Any additional demand for social infrastructure, particularly education and healthcare because of the increase in population on-site, would be mitigated, where necessary, through financial contributions made through Community Infrastructure Levy payments and/or a Section 106 agreement agreed pursuant to the planning application.

e. Pollution and Nuisances

Transport and Access

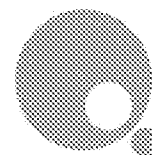
Construction traffic effects are not expected to be significant. Construction traffic routes, movements and associated effects such as driver disruption, dust and dirt would be dealt with through standard and widely used management measures. The net change in Heavy Goods Vehicles ('HGVs') and light vehicular traffic flows on the local road network during construction of the Development is not expected to be significant in the context of existing traffic flows on the surrounding highways. This is due to the scale of the Development and relative ease of access onto the strategic road network.

The Site has good public transport links. The closest bus stops to the Site are situated approximately 200m east of the Site on the B2187 (northbound and southbound). The bus stops are served by to 700 Coastliner route which runs frequently between Brighton and Wick. Additional bus stops close to the Site are located approximately 300m north east of the Site on the B2187 Worthing Road (eastbound and westbound). These stops are served by the 12 and 700 Coastliner bus routes. Route 12 runs services between Rustington and Littlehampton.

The Development is not considered to result in significant transport effects once it is complete and operational. The Development is estimated to generate circa 55 two-way vehicle movements during both the AM and PM peak hours. The Development could generate circa 552 average annual daily traffic (AADT) (24hr) vehicle movements with approximately five of these movements being undertaken by a HGV (1% of the total vehicle movements across 24 hours). However, these increases are unlikely to be significant in the context of existing traffic flows using the surrounding strategic road network that serves the Site.

The Development will utilise the recently opened Fitzalan Link Road which is adjacent to the western boundary of the Site and opened for traffic in December 2021. The Fitzalan Link Road was constructed as part of the highways improvement scheme associated with an approved residential development (ref: LU/47/11) located on Land north of Toddington Lane. Further details on the scheme are provided in table 1.

A Travel Plan will support the Development to promote the sustainable transport modes identified above and reduce the use of private cars by the future occupants. No significant effects are therefore anticipated. Additionally, the planning application will be supported by a Transport Statement which will consider the existing conditions of the local area and the proposed changes brought forward by the Development. It will also take into consideration the effect of the proposals on the local transport network.



Noise and Vibration

The Site is in a mixed-use urban area of residential, educational, commercial and retail land uses. The nearby schools and residents have been considered as sensitive receptors. The ambient noise and vibration environment is primarily influenced by road traffic sources from the nearby A259 and the B2187.

The Development is expected to be constructed in approximately 3 years (following a grant of consent). There is likely to be increased noise during the construction works, including noise resulting from construction plant and vehicles. These noise sources will be temporary and will be controlled by industry standard good practice measures including acoustic screening/site hoardings, the selection of appropriate construction techniques, and the restricted operation of certain plant and activities to agreed hours. Given the above, the existing ambient noise environment and the proposed mitigation to be employed on-site, it is not considered that the Development will result in significant noise or vibration effects during the construction phase. HGVs accessing / egressing the Site have the potential to cause highly localised vibration effects, however these effects are not expected to be significant at the sensitive receptors.

Where a receptor is affected by continuous traffic flow, significant increases in traffic flows are required to generate a 'just perceptible' change of 3dB. The volume of road traffic generated by the completed Development is not likely to increase to the extent that an increase in overall traffic noise would be perceptible. Development associated traffic will be minimised through good practice measures, including the adoption of a Travel Plan. It is therefore considered unlikely that traffic from the Development would give rise to significant effects on nearby noise sensitive receptors.

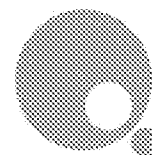
The Development will feature minimal on-site operational plant and machinery due to the nature of the proposed residential uses. Where plant is required, noise will be limited to acceptable thresholds and located away from sensitive receptors as far as practicable. Mitigation measures may include plant enclosures, screens and / or attenuated ventilation systems. It is considered unlikely that the Development would give rise to significant effects from operational plant noise.

The Development will be subject to appropriate acoustic design and glazing and ventilation principles to protect future residents' amenity. The Development will be designed to meet internal noise level requirements of BS 8233:2014, as well as Arun DC's requirements.

As such, it is not considered that there will be significant noise and vibration effects as a result of construction works or operation of the Development. Notwithstanding this, a Noise Assessment will be conducted and submitted with the planning application.

Air Quality and Odour

The Site is not located within an AQMA. The Worthing Grove Lodge/ Lyons Farm AQMA is the closest AQMA to the Site, located approximately 2.4km north east of the Site. The Worthing Grove Lodge/Lyons Farm AQMA was designated for exceedances in mean annual nitrogen dioxide (NO₂) levels. A change in traffic flows associated with the Development has the potential to affect local air quality as does temporary dust effects generated by the demolition and construction process. The



principal air pollutants of concern with respect to the Development will be NO₂ and particulate matter (PM₁₀ and PM_{2.5}).

During the construction works, the greatest potential air quality effects relate to dust nuisance. Good practice measures will be implemented to minimise and control dust at source during construction. These will be detailed through the use of method statements and include measures such as hoarding, water suppression and covering of transport vehicles. Method statements will be based on industry standard guidance published by the Institute of Air Quality Management. Given the implementation of such measures, dust during the demolition and construction phase is not expected to give rise to significant adverse effects on sensitive receptors.

Construction plant and equipment used for construction works will be modern and compliant with current EU emissions standards. With these standard practice measures in place and due to the scale of the Development, exhaust emissions during construction works are not expected to give rise to significant adverse effects. No significant effects during the construction phase are therefore expected.

Road traffic generated by the completed Development would lead to some increases in NO₂ and particulates and may therefore impact local air quality. However, as noted above, Development-generated trips are not expected to be significant and would be minimised through the implementation and promotion of sustainable travel options. Emissions are therefore unlikely to be significant in the context of existing traffic flows or lead to exceedances of air quality objective levels.

There are no sources of odour within or in close proximity to the Site that could affect future residents of the Development. As such, no significant odour effects are considered likely.

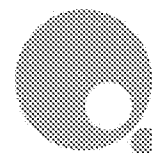
Given the residential nature of the Development, there will be minimal on-site plant and machinery. Therefore, it is not likely that the Development will involve any significant releases of pollutants or any hazardous, toxic or noxious substances into the air. In any event, such emissions would be dealt with by standard measures and conditions.

Given the above, it is considered that the Development will not give rise to significant construction or operational air quality or odour effects. Notwithstanding this, an Air Quality Assessment will be undertaken and submitted with the planning application.

Ground Conditions and Contamination

British Geological Survey maps for the area show the Site is underlain by Raised Marine Deposits (undifferentiated) (Secondary A aquifer) beneath which is the Culver Chalk Formation and Portsdown Chalk Formation (Undifferentiated) (Principal A aquifer).

A review of historical maps shows that the majority of the Site as undeveloped and broadly in its present day, greenfield form throughout the late 19th and 20th centuries. The exception is a small section in the north west of the Site which was used as a brick field in the 20th century and the mapping indicated signs of excavation associated with the brick field, which has since been filled in.



Consequently, although there is potential for contamination from the brick field, for the majority of the Site, the risk of encountering contamination associated the historical use is considered to be low.

A historical landfill site is located adjacent to the northern boundary of the Site, where the Land South of Cornfield Close 'development is being constructed. To accompany the planning application for the approved housing development, a Ground Investigation Report ('GIR') was submitted which conducted a risk assessment for the approved housing development Site. The GIR stated that the present made ground at the Daisyfields development site comprised landfilled material including brick, glass, plastics, coal, and black organic matter. The GIR also stated that there was a risk of ground gases associated with the approved housing development site's historical landfill use.

The GIR considered the risk to adjacent land uses of the approved housing development site was moderate to low in relation to contaminants of concern (Shallow Soil and Shallow Made ground); contaminants of concern (Deeper Made Ground / Infilled Ground); and Ground Gases and Vapours. The risk was very low in relation to and naturally occurring aggressive ground conditions.

Construction works will be undertaken in line with standard practice and legislative requirements to manage any isolated areas of contaminated material or ground gas, should this be encountered and minimise pollution risks to controlled waters and to human health. Prior to construction, a programme of intrusive site investigation would be undertaken with agreement of Arun DC, secured by planning condition. The results of this will be used to develop a remediation strategy if required, which would be subject to Arun DC's agreement and also secured via a planning condition. A verification and monitoring programme will also be employed if required. As such, significant environmental effects are not considered likely to occur during construction.

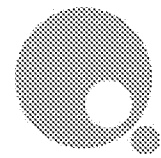
The Site is shown to be located within a low risk Radon Affected area, as defined by the Health Protection Organisation, as only 1-3% of the properties in the area are above the Action Level. As such, it is considered that radon protective measures are not necessary at this site.

On completion of the Development, much of the Site will be covered with new buildings and hardstanding, with additional mitigation measures such as petrol interceptors and bunding in place where appropriate to minimise the potential for accidental spills and contamination. As such, the risk to receptors (namely human health and ground / surface waters) is considered to be low and there would be no likely significant effects related to ground conditions or contamination from the completed Development.

Following the completion of site investigation and appropriate mitigation measures, if required, the risk to receptors is considered to be low and it is not considered likely that there would be significant effects as a result of the operation of the Development.

Water Resources, Flood Risk and Drainage

The closest watercourse to the Site is the River Arun, which lies approximately 1.3km south west of the Site at its closest point. The Site is entirely located within Flood Zone 1, whereby the annual probability of fluvial and tidal flooding is classified as having a less than 0.1% chance of flooding in a



year. A small pocket of the Site is identified as being at low risk from surface water flooding, the remaining area is at very low risk.

The Site is underlain by Principal A bedrock aquifer. The Site does not lie within a groundwater source protection zone. Potential risks to the underlying groundwater aquifer during construction will be controlled through standard measures during construction, which would be agreed with Arun DC. Whilst the completed Development will provide limited car parking facilities, and plant and machinery will be minimal, potential pollution sources within the completed Development (e.g. fuel/oil spills) will be dealt with through standard design measures. As such, the Development is not likely to result in any significant water quality effects.

With respect to surface water flood risk, construction works would begin with the levelling of the Site and the creation of a suitable plateau for development as well as the construction of any necessary attenuation features. The completed Development will incorporate a surface water drainage strategy with Sustainable Drainage Systems (SuDS) features where appropriate to control surface water discharge and ensure the Development does not give rise to significant flood risk elsewhere. As such, the Development is not likely to result in any significant flooding effects.

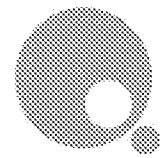
The completed Development will lead to an increased demand for potable water and foul water discharge as a consequence of the new residential and commercial uses. Water conservation measures will be incorporated. These may include such features as rainwater harvesting, reduced flow taps, smaller cistern sizes and the use of rainwater or grey water for toilets. Therefore it is not considered the effects on water demand would be significant.

Overall, no likely significant effects with respect to water resources, flood risk and drainage. Notwithstanding this, a Flood Risk Assessment and Surface Water Drainage Strategy, which will outline drainage control measures, will be submitted as part of the planning application.

f. Archaeology

The majority of the Site, with the exception of the south east section of the Site, is located within a category amber ANA. As described above, a review of historical maps shows that the majority of the Site as undeveloped and broadly in its present day form throughout the late 19th and 20th centuries. The exceptions being a small section in the north west of the Site which was used as a brick field in the 20th century and a barn known as 'South Barn' was located to the west of the Site. As such, for the majority of the Site modern development has not occurred that would otherwise have disturbed or truncated any pre-existing near-surface records, with the exception being the area used as part of the Brick Works. A review of the Historic Environment Record (HER) reveals that there have been no significant archaeological finds recorded on the Site although archaeological finds have been recorded within 500m of the Site.

As the Site is located within an ANA, further archaeological investigation will be required prior to development taking place within any given part of the Site. Therefore, a Written Scheme of Investigation (WSI) will be agreed with Arun DC outlining any pre-construction archaeological investigation works to be undertaken of the Site.



g. Built Heritage, Townscape and Visual Impact

The Site is undeveloped grassland. The Site is used by dog walkers. The topography of the Site and surrounding area is broadly flat. The immediate environment surrounding the Site is one of mixed character composed mostly of low-rise residential, retail and commercial land uses.

The Site is in close proximity to tourist attractions such as Littlehampton Pier and Harbour Park (approximately 2km south of the Site). The immediate environment surrounding the Site is one of low-rise (2-3 storey) commercial and residential properties including detached, semi-detached and terraced houses. The nearest residential receptors are those on Oakcroft Gardens, which form part of the eastern boundary of the Site.

The Site is not located within or in close proximity to an Area of Outstanding Natural Beauty (AONB).

The Development comprises a mix of 2 storey semi-detached properties and a 3 storey apartment block and is in keeping with the surrounding residential use and low-rise buildings in close proximity to the Site. The Development also retains a significant amount of greenspace adjacent to the nearest residential receptors. Therefore, it is unlikely that the Development would give rise to significant adverse townscape and visual effects.

There are no statutorily listed buildings on the Site and it is not located within a Conservation Area. There are however heritage assets in the vicinity of the Site. In order of proximity to the Site boundary, these are:

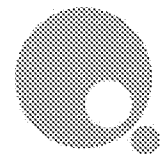
- Littlehampton (East Street) Conservation Area approximately 80m south west of the Site;
- Grade II listed Leila Cottage approximately 480m west of the Site; and
- Grade II listed The Old Cottage approximately 500m west of the Site.

The Grade II listed properties are of a low height and massing such that they are well screened by existing built structures. Similarly, as the Development is also low rise, it is unlikely to be a significant view form the existing listed properties. Therefore, it is unlikely that the Development would give rise to significant adverse effects on the site and setting of these heritage structures.

h. Biodiversity and Arboriculture

The Site is currently undeveloped grassland with trees on the boundaries. The Site is not located within a designated ecologically sensitive area. The closest statutory designated site for nature conservation to the Site is the Climping Beach SSSI which is located approximately 1.8km south west of the Site. The eastern part of the Climping Beach SSSI is also known as The West Beach LNR. The Site is considered to be of a sufficient distance from the designation to not result in significant effects.

There are 113 individual and groups of trees located on the Site, particularly along the northern boundary. All the trees on the Site are graded as category B, C or U. No Grade A trees are located on the Site. The trees on the north and north eastern boundaries of the Site are subject to a group Tree Preservation Order (TPO) (TPO Ref: TPO/LU/2/18). The proposals will require the removal of approximately 40 (the majority of which are Grade U or C). A limited number of Grade B trees will



potentially be removed; these are located on the north eastern corner of the Site where a large group of tightly growing trees are located. The removal of the Grade B trees will allow the remaining grade B trees to grow to their full canopy potential.

The removal of trees for Development will be mitigated through the planting of suitable specimens within a landscaping scheme. The completed Development will include a landscaping strategy (to be submitted with the planning application) that will deliver beneficial landscaping, tree planting and amenity spaces. This would be subject to approval by Arun DC.

To ensure the effective protection of retained trees during construction, protective measures will be installed, in accordance with BS5837: 2012 and may comprise of protective fencing and/or ground protection. Where possible, fencing would be positioned to protect the entire Root Protection Area of the retained trees in order to create a Construction Exclusion Zone. As such, it is not anticipated that there would be significant effects on arboriculture.

As outlined in the Ecology Report dated September 2021 and submitted as part of the Pre-Application, there is potential for protected species on the Site, namely: bats, small mammals, birds, reptiles and amphibians. However, this potential will be assessed through field surveys during the appropriate seasonal windows in mid-2022. Should any protected species be recorded on-site, appropriate measures will be taken in advance of the commencement of works to ensure that the population is suitably safeguarded or translocated.

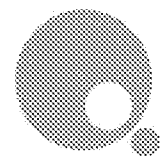
Appropriate measures will be adopted during the construction phase to limit the occurrence of adverse effects on any sensitive ecological receptors, including noise, dust and lighting effects. Consequently, it is not anticipated that the Development will result in significant ecological effects during the construction phase.

Recommendations for ecological mitigation and enhancement measures will be incorporated into the scheme design where appropriate, such as use of green infrastructure and an appropriate lighting strategy. The completed Development will include a linked network of green spaces and a carefully considered landscape strategy, which will contribute towards biodiversity net gain.

A Tree Survey and Arboricultural Report; an Ecological Impact Assessment; a biodiversity checklist, a Habitat Survey; and a Bat Survey will all be submitted with the planning application. These will include results of any additional survey works, as well as recommendations for further survey works (where applicable), to ensure arboricultural and ecological effects are identified where necessary and mitigated accordingly. Consequently, it is not anticipated that the Development will result in significant ecological effects.

I. Agriculture and Soils

The Site is not currently in agricultural use. A review of Natural England's Land Classification maps show that the land is classified as 'Non-Agricultural Land – Land predominantly in urban use'. Therefore, the Development is not going to result in the loss of agricultural land. No significant effects are therefore anticipated.



j. Microclimate: Wind

The wind climate of the Site is dominated by south westerly winds with secondary winds from the north east. Whilst the Site is predominantly composed of grass and trees, the surrounding development is relatively low rise.

The proposed scale and height of the Development is unlikely to generate wind effects within the Site and the surrounding area. On this basis, it is assumed that the Development is not likely to give rise to significant effects.

k. Microclimate: Daylight, Sunlight, Overshadowing, Light Pollution and Glare

The Site is relatively unobstructed by any nearby existing neighbouring buildings, the majority of existing surrounding buildings are low rise, at two storeys in height, with the exception of the four storey apartment blocks proposed to be built as part of the Land South of Cornfield Close development. The Development is also low-rise with the buildings on the Site two or three storeys in height in keeping with housing in the neighbouring areas. As such, it is considered that the Development would not give rise to significant effects.

Facade details for the design proposals are currently unconfirmed, but they will not have a significant reflective value and consideration of solar glare will be incorporated within ongoing design development to ensure that road users along the Fitzalan Link Road remain unaffected by the completed Development.

l. Risk of Major Accidents and Disasters

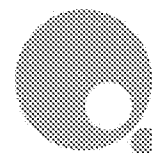
There are no Control of Major Accidents Hazards (COMAH) registered activities within or close to the Site. Construction of the Development will be undertaken in accordance with current health and safety regulations and guidance to minimise the risk of accidents. The operation of the Development will not include the use of particularly hazardous substances or technologies, and therefore the risk of a major accidents or disaster is not considered to be significant.

m. Risk to Human Health

The most significant risks to human health relate to poor ambient air quality and noise conditions. As set out above, these issues are capable of being addressed through design. The Development is not expected to introduce any activities that would affect the health of the local population. As such, no significant effects are anticipated.

n. Climate Change

It is not considered that the Development will give rise to a significant effect on greenhouse gases due to its nature of use and expectation that there would be no significant uplift in road traffic trips. The Development will incorporate appropriate climate change adaption measures designed to address the potential risks associated with climate change, including allowance for storm events in drainage design, use of durable materials, solar shading and glazing to avoid overheating. Overall, no significant increases in greenhouse gas emissions are anticipated as a result of the Development.



Cumulation with Other Development

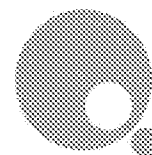
Table 1 provides a schedule of other approved development schemes (known as 'Cumulative Schemes') which have been identified in proximity to the Site. This list was principally compiled based on the proximity of the scheme to the Site (circa 1km radius), potential scale and massing in consideration of townscape, heritage and views and transport effects (which have the greatest extent of potential cumulative effect), beyond which material cumulative effects are not considered to occur.

Table 1: Schedule of Cumulative Schemes

Cumulative Scheme	Distance from Site boundary
Land South Of Cornfield Close, Littlehampton, BN17 6LD (Ref: LU/330/18/PL) Demolition of existing buildings & the erection of 77 residential homes with associated access, car parking, cycle parking, refuse/recycling storage, landscaping, earthworks & infrastructure <i>Approved August 2019 – currently under construction</i>	Adjacent to northern boundary of the Site.
Land north of Toddington Lane, Littlehampton BN17 7PP (Ref: LU/47/11/) Outline application with some matters reserved for mixed use development comprising: demolition of existing buildings and structures, up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan), up to 13,000 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre), up to 3,500 sqm of Class A local facilities, a 100 bed hotel, 60 bed care home, a new 2 Form Entry primary school, community centre, youth and leisure facilities, combined heat & power plant, extension to existing household recycling centre, landscaping, replacement and additional allotments, multi-functional green infrastructure including sports pitches (& associated changing facilities), informal open space, children's play areas, primary vehicular access from a new access from the A259 bridging over the railway line with additional access from Mill Lane & Toddington Lane. This application is the subject of an Environmental Impact Assessment. This application affects a public right of way. <i>Approved January 2013 – currently under construction</i>	Approximately 600m north of the Site.

The nature, scale and use of the Development and the cumulative schemes outlined in Table 1 is in keeping with typical urban developments. As such, it is not expected that significant cumulative effects would occur.

In the absence of mitigation there would otherwise be the potential for cumulative construction phase effects relating to traffic, air quality and noise, should these works overlap. However, such effects would be of a temporary nature and managed to an acceptable level through standard widely applied good practice environmental management measures for each scheme as that significant cumulative construction impacts are not expected.



In terms of the potential for cumulative traffic, air quality and noise effects, the exact level of traffic associated with each cumulative scheme is not known at this stage. The Development and the cumulative schemes in Table 1 are well served by the existing local strategic road network and public transport links. In addition, appropriate assessment of transport and access for the aforementioned schemes would have been undertaken in line with Arun DC's planning application requirements to ensure sufficient capacity on the existing local strategic road network and incorporate any mitigation measures, where required. No significant in-combination effects with respect to traffic and transport, air quality and noise effects are therefore anticipated.

The Development's massing and design is in keeping with developments in the surrounding urban area. As such, it is considered unlikely that the completed Development will result in significant effects in cumulation with other developments.