

## **Arun District Council responded to Highways England's Scoping Consultation on 1 April 2021.**

Below is the narrative from that response, for your information:-

I make the following comments on behalf of Arun District Council in response to the Scoping Consultation.

### Flood Risk & Drainage

- The scheme should take account of the influence(s) that the new road, its corridor and construction impacts would have on groundwater – particularly but not exclusively, in terms of existing flow paths.
- Diverting flows (in aquifers or watercourses) may impact existing watercourses and any restriction of flow (damming) could increase flood risk on the upstream side and depletion of flow on the downstream (effects on abstraction points).
- There are source protection zones along the route which would need to be accounted for and measures taken to avoid contamination or fluctuation of resource availability.
- There is a general line of springs along the existing A27 route.
- Dealing with surface water run-off should be dealt with as local to the point of impact as possible – translocation of water to adjacent rife and stream catchments may have an effect on water chemistry of the receiving watercourse.
- Ideally, the run-off should be subject to the same hierarchy that we deal with surface water on normal developments – i.e., first infiltrate, followed by controlled discharge to watercourse and then controlled discharge to a sewer/drain. I assume that Highways England will have guidelines for storm intensity etc. to be dealt with in highway situations, so our current guide of 100 year + 40% climate change may not be applicable but this should be taken as a starting point for assessing allowable discharges.

Whilst these issues relate to the road and its construction, the matter of mitigation measures must also be borne in mind and all of the above may be relevant in that respect.

Works to watercourses will require either Consent (from Arun having delegation from WSCC as LLFA) or an Activity Permit (from the EA if the watercourse is designated Main River). Criteria for these 'permissions' should be ascertained from the relevant authorities.

Suitable treatment of run-off prior to discharge is essential if downstream pollution is to be avoided. Retention / detention ponds should be designed to be safe and sufficient.

Long-term borehole monitoring is essential if an understanding of groundwater in the area is to be fully understood and accounted for. I understand that this is being initiated within the Ground Investigations currently getting underway. I understand that some prior 'snap-shot' monitoring has been undertaken but it is essential that continuous pan-season monitoring is undertaken.

There are series of limestone solution features (dolines) in the Fontwell area – these should be identified and assessed for how the new road might impact upon them (or vice versa).

The Environment Agency will be best placed to comment upon flood risk in the River Arun corridor. Road proposals should complement efforts of flood risk reduction in the short, medium and long

term. The overall impacts of the choice between embankment or viaduct for the river crossing should take account of tidal, fluvial and pluvial risk (and in combination).

We are aware that the cabling from the proposed Rampion Windfarm extension will cross the new road before its connection point with the National Grid at Bolney. It would be sensible for the promoting authorities to liaise and agree mutual arrangements re ducting provision etc.

Network Rail and Littlehampton Harbour Board must be consulted. The former in respect of the rail crossing and the latter for underbridge clearances etc as the river is within Harbour limits up to the Queen Street bridge in Arundel. I understand that the Harbour Board is in discussion with the delivery team to maximise the beneficial use of the river/harbour during the construction phase – this is to be applauded.

### Landscape

In general, the report has covered in depth the obvious and main points which we would be requiring to have included within the scoping report. Sections 8-9 have provided a good level of detail re content, methodology potential effects and mitigation. The hydrology aspect we will leave to engineers to comment.

The benefits of the scheme will inevitably come at some environmental cost, which the Environmental Impact Assessment will seek to highlight.

Arun will be looking for assurances from the scoping report to address in particular;

- Habitat protection particularly any interface with Ancient woodland. Appreciation of the legacy of any physical attributes i.e. Trees/ancient hedgerows.
- Mitigation for landscape/habitat loss. Net gain or betterment in the proposed scheme. Unavoidable tree loss to be addressed with new planting which over time will be required to improve the diversity and resilience of the local tree population, considering climate change and new and emerging threats from pests and diseases impacting our trees. The opportunity to introduce genetic diversity within the mitigation plans, which may help to increase climate resilience in the long term.
- Visual impact to the wider surrounds, landform and visual character. Impact on the SDNP to the north and impact on local areas of special landscape character. Impact on existing settlements and the necessary mitigation, to also include visual impact of mitigation associated with any noise barriers deemed to be required.
- Landscape creation, habitat replacement, landscape severance and connectivity across the A27 to be considered and addressed within the scheme's mitigation proposals.
- The effect of the proposals on Arun's evolving landscape and the interface with planned and known upcoming development in this area.

The above whilst not exhaustive would be points of significant landscape impact that we would be looking for the report to address.

### General Issues

- Heritage and Conservation - impact on setting of CA, listed buildings and on ancient monuments and archaeology, non-designated assets and impact on the setting of Arundel.

- Biodiversity and habitats - designated national and local habitats rare species (Bats) and the broader Biodiversity Opportunity Areas and Pagham Harbour SPA and Arun Valley SPA/SAC.
- Impacts on the landscape - sensitivity of the South Downs National Park as well as its setting - light (night skies), noise and vibration pollution as well as dust, emissions and air quality, carbon reduction and modal shift and renewable energy sources.
- Sustainable construction and sourcing and transport of materials.
- Rights of way, severance of communities and access for Non-Motorised Users , disability (all users) and wildlife and Green Infrastructure networks/corridors.

Regards,

Nigel Lynn, Chief Executive, Arun District Council