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Your Ref: EN010117

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Please ask for:
Neil Crowther

Our Ref:

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Dear Planning Inspectorate

Rampion 2 Offshore Wind Farm – Response to the Examining Authority’s Written Questions (Deadline 3)

This letter provides Arun District Council’s (ADC) response and comments to the Examining Authority’s Written Questions at Deadline 3, where applicable to ADC, for Rampion 2 Offshore Wind Farm.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours

[REDACTED]

Neil Crowther
Group Head of Planning

Arun District Council

Arun District Council's Response to Examining Authority's Written Questions

ExA Questions - Construction, Operation and Decommissioning Matters			Arun District Council's Response
COD 1.1	<p>Commitments Register</p> <p>Horizontal Directional Drilling (HDD)</p> <p>Natural England</p> <p>Environment Agency</p> <p>Forestry Commission</p> <p>South Downs National Park Authority (SDNPA)</p> <p>The Woodland Trust Sussex Wildlife Trust</p> <p>West Sussex County Council (West Sussex CC)</p> <p>Horsham District Council (Horsham DC)</p> <p>Arun District Council (Arun DC)</p>	<p>Provide a response to the Applicant's statement in the Applicant's Responses to Relevant Representations, J3 [REP1-017] on page 416 that:</p> <p><i>"Commitment C-5 (Commitments Register [APP-254] (provided at Deadline 1 submission) has been updated at the Deadline 1 submission to clarify that Horizontal Directional Drill (HDD) or other trenchless technology will be deployed in accordance with Appendix A: Crossing Schedule of the Outline of Construction Practice [PEPD-033] secured via Required 22 within the Draft Development Consent Order [PEPD-009]. The Applicant will not switch to open-cut trenching at these locations. The appropriate realistic Worst-Case Scenario has been assessed in the ES. Note, that in the unlikely event that another trenchless technology is deployed at a specific crossing, this would require demonstration that there are no materially new or materially different environmental effects. Any change will need to be approved by the relevant planning authority through amendment to the stage specific Code of Construction Practice and Crossing Schedule."</i></p> <p>Explain whether there are any remaining concerns on the reliance on HDD or other trenchless technology at the locations specified by the Applicant in the Crossing Schedule in Appendix A of the Outline of Construction Practice [PEPD-033] to be secured via Required 22 within the Draft DCO [REP2-002].</p>	<p>ADC has no further concerns regarding this issue from a biodiversity perspective.</p>
COD 1.7	<p>Decommissioning</p> <p>The Applicant</p>	<p>The Applicant</p>	<p>ADC has no comments on the recycling or reuse of the wind turbine materials at the decommissioning stage.</p>

	<p>MMO</p> <p>Natural England</p> <p>The Environment Agency</p> <p>Relevant Planning Authorities</p>	<p>Provide an Outline Decommissioning Plan for the offshore infrastructure, as requested by Natural England [REP2-038, Page 3].</p> <p>Explain plans in place to follow the waste hierarchy at the decommissioning stage, particularly any plans on how the wind turbine materials might be reused or recycled.</p> <p>The Environment Agency / Natural England / MMO / Relevant Planning Authorities</p> <p>Comment on expectations for recycling or reuse of the wind turbine materials at the decommissioning stage.</p>	
<p>ExA Questions - Draft Development Consent Order (Draft DCO) and Draft Deemed Marine Licence (Draft DML)</p>			<p>Arun District Council's Response</p>
<p>DCO 1.18</p>	<p>Schedule 1, Part 3 Requirements 10, 12 and 16</p> <p>Horsham DC</p> <p>Arun DC</p> <p>West Sussex CC</p> <p>SDNPA</p> <p>Mid Sussex DC</p>	<p>Provide a response on the Applicant's amendments to the draft DCO submitted at Deadline 2 [REP2-002] in which the definition of "Commence" in Article 2 and a number of Requirements have been amended in respect to "carving-out" onshore site preparation works for the onshore Works.</p>	<p>ADC seeks the definition of 'commence' to include onshore preparation works (other than surveys), ecological mitigation, temporary hardstanding, or the erection of welfare facilities.</p> <p>ADC expects that onshore site preparation works are included (and not 'carved out') in Requirements, particularly given onshore preparation works have been updated to include temporary hardstanding, or the erection of welfare facilities. It is ADC's view that this also applies to Requirement 14.</p>
<p>DCO 1.19</p>	<p>Schedule 1, Part 3 Requirement 14</p> <p>The Applicant</p> <p>Horsham DC</p> <p>Arun DC</p>	<p>There are concerns from relevant planning authorities over the provisions of this Requirement and the reliance on the provisions contained within the Biodiversity Net Gain (BNG) Strategy Information document, Appendix 22.15 to Chapter 4 of the ES [APP-193]. The ExA notes the Applicant's responses to West Sussex CC [REP2-020] and SDNPA [REP2-024] in respect to the wording within the Requirement and the BNG Strategy</p>	<p>Reference to the outline biodiversity net gain (BNG) information comprising Appendix 22.15 in Requirement 14 of the draft DCO does not provide clarity of securing BNG within Arun.</p> <p>ADC advise that the current Requirement 14 wording should be amended to include the addition of a Habitat Management and Monitoring Plan securing</p>

	<p>West Sussex CC</p> <p>SDNPA</p> <p>Mid Sussex DC</p>	<p>Information document. However, the ExA is concerned that the BNG Strategy Information document may not contain the required evidence or clarity that BNG can be achieved, and accordingly Requirement 14 is not adequate in its current guise.</p> <p>Interested Parties are asked to review the questions contained in BD (below) and consider whether Requirement 14 needs amending and suggest appropriate wording.</p>	<p>biodiversity net gain for 30 years. Please also refer to DCO 1.18 above regarding the wording for Requirement 14.</p>
ExA Questions - Biodiversity		Arun District Council's Response	
BD 1.1	<p>Biodiversity calculations</p> <p>The Applicant</p> <p>Natural England</p> <p>SDNPA</p> <p>West Sussex CC</p> <p>Horsham DC</p> <p>Arun DC</p> <p>Mid Sussex DC</p>	<p>For The Applicant</p> <p>a) Volume 4, Appendix 22.15 of the ES [APP-193] states metric 4.0 version of the biodiversity metric has been used to calculate the biodiversity baseline and present planned BNG outcomes. Confirm that this was the latest version at the time of submission.</p> <p>b) The ExA requests the BNG metric spreadsheet used for the calculations is submitted into the Examination.</p> <p>For Natural England, SDNPA, West Sussex CC</p> <p>c) It is noted that the latest metric is now the Statutory Biodiversity Metric. Explain whether the calculations need to be updated using the latest version.</p> <p>d) Is there agreement on the biodiversity baseline presented in Appendix 22.15 Biodiversity Net Gain information [APP-193] for the:</p> <p>i. Total number of baseline units calculated for the worst-case realistic scenario.</p> <p>ii. Total number of units lost to the Proposed Development.</p>	<p>ADC seeks clarity on the BNG calculations within the Arun area, as this breakdown has not been provided to understand the units lost at the local level. Clarity would be provided by submission of the BNG metric spreadsheet.</p> <p>ADC expects BNG to be delivered within or close to the Development Consent Order Limits (in line with the principles of BNG) within Arun in accordance with the mitigation hierarchy.</p> <p>ADC would expect that the BNG statutory metric is used to update the BNG results.</p> <p>ADC feels clarity does not exist for the BNG calculations within the Arun area as the metric spreadsheet has not been provided.</p>

		e) Confirm whether clarity exists on how the calculations have been done and is there agreement on the methodology and the spatial areas for which the calculations have been presented?	
BD 1.2	<p>Mitigation Hierarchy</p> <p>Natural England</p> <p>SNDPA</p> <p>West Sussex CC</p> <p>Horsham DC</p> <p>Arun DC</p> <p>Mid Sussex DC</p>	Confirm that the Applicant has adequately followed the mitigation hierarchy in respect to no biodiversity net loss and biodiversity net gain.	ADC is satisfied that reasonable measures have been taken to avoid harm to statutory sites and priority habitats and species.
BD 1.5	<p>Alignment with National and Local BNG Plans, Policies and Strategies</p> <p>Horsham DC</p> <p>Arun DC</p> <p>West Sussex CC</p> <p>Environment Agency</p> <p>SDNPA</p>	<p>a) Confirm that the proposal for BNG aligns with and complements relevant national or local plans, policies and strategies including the Local Nature Recovery Strategy or other relevant local plans, policies or strategies.</p> <p>b) Confirm that the mitigation hierarchy has been adequately followed to avoid then mitigate then compensate, in that order, in respect to biodiversity.</p>	<p>ADC would like to see a commitment and clear mechanism to provide BNG at the local (District) level in line with Policy ENV DM5 of the adopted Local Plan. Without BNG in the District and, given the lack of clarity on BNG, the Project is not considered by ADC to be compliant with ADC's policy.</p> <p>ADC considers that the Applicant has adequately followed the mitigation hierarchy in relation to mitigation and compensation.</p>
BD 1.6	Clear Differentiation between Delivery of Compensation and Enhancement.	Concern has been raised by SNDPA [REP1-049], Sussex Wildlife Trust [RR-381], Horsham DC [REP1-044] and Natural England [RR-265] regarding the transparency between delivery of compensation for the	ADC would like further clarity on BNG in the Arun area. Table 4-5 on page 24 of Volume 4, Appendix 22.15 of the ES APP-193 does not sufficiently provide clarity as the metric spreadsheet has not been submitted. ADC

	<p>Natural England</p> <p>SDNPA</p> <p>West Sussex CC</p> <p>Horsham DC</p> <p>Arun DC</p>	<p>Proposed Development i.e. no net loss of biodiversity and biodiversity enhancement of 10% i.e. 10% biodiversity net gain (BNG). The Applicant states it has used the Natural England BNG metric tool to calculate the units required for both [APP-193].</p> <p>a) Explain whether Table 4-5 on page 24 of Volume 4, Appendix 22.15 of the ES APP-193, provides a sufficiently clear and transparent explanation of how many units of each type are required and is there agreement on the number of units to achieve no net loss and 10% net gain.</p> <p>b) Comment on whether no double-counting is clear between activities planned to deliver mitigation, compensation, enhancement and net gain.</p> <p>c) Is further explanation required? If so, please specify what is needed.</p>	<p>would seek to review the statutory metric for Arun area before being able to make comment on b).</p> <p>The Table 4-5 on page 24 of Volume 4, Appendix 22.15 of the ES APP-193 shows a net loss of biodiversity units for all unit types across the Project. It is not clear how many units of each habitat type would be lost within the Arun area.</p> <p>Volume 4, Appendix 22.15 of the ES APP-193 states they will secure 67 habitat units, 7 hedgerow units and 1 river unit across the whole Project. Evidence to the number of units to achieve no net loss and 10% net gain is not clear for the Arun area and therefore further explanation is requested.</p> <p>Further information is required as to how 10% BNG will be achieved and secured in Arun. ADC seek a Biodiversity Gain Plan and Habitat Management and Monitoring Plan to cover the Arun area to be secured.</p>
ExA Questions - Climate Change			Arun District Council's Response
CC 1.2	<p>Climate Resilience - Depth of HDD at Climping Beach</p> <p>The Applicant</p> <p>The Environment Agency</p> <p>Clymping Parish Council</p> <p>Arun DC</p>	<p>Is there agreement that Commitment C-278, which states a minimum depth of 5m is maintained when passing beneath Climping Beach SSSI, provides sufficient depth of HDD to be climate resilient to coastal erosion.</p>	<p>The Environment Agency is the operating authority for this section of coastline. ADC therefore refer to the comments provided by the Environment Agency on flood and erosion risk. However, ADC has provided some informative information below.</p> <p><u>Informative information</u></p> <p>ADC cannot see that agreement can be reached by simply a "5m minimum" as this will not adequately address the risks highlighted. ADC's rationale being that Elevation (Z) changes with respect to Easting (X) and Northing (Y). It is therefore possible that if the cable were to mirror the existing elevation, the cable could foreseeably be as high as 0 Ordnance Datum</p>

			<p>Newlynn (ODN) in areas. This would be inappropriate, as if erosion were to occur, the cable could become exposed.</p> <p>ADC therefore suggestion that this is reconsidered. It would be more appropriate to state the depth relative to ODN as this is the vertical datum used for the Ordnance Survey i.e the HDD will follow an approximate drive line of (X) below ODN.</p>
ExA Questions - Flood Risk			Arun District Council's Response
FR 1.7	<p>Flood Risk Related to the Entire Proposed Development</p> <p>West Sussex CC Horsham DC</p> <p>Arun DC</p> <p>The Environment Agency</p>	<p>Comment on any outstanding concerns regarding flood risk related to the Proposed Development as a whole, other than the Oakendene site raised in questions FR1.2 to FR1.4, related to but not limited to:</p> <p>a) The quality of and conclusions from the Applicant's Site-Specific Flood Risk Assessment [APP-216], including the approach to, application of and conclusions from the Sequential and Exception Tests.</p> <p>b) Whether the information in the FRA is credible, fit for purpose, proportionate to the degree of flood risk and appropriate to the scale, nature and location of development and takes the impact of climate change into account.</p> <p>c) Whether the development has been steered towards areas with the lowest area of flood risk from all sources of flooding.</p> <p>d) Whether or not the Proposed Development would increase flood risk elsewhere.</p> <p>e) Whether or not there would be a net loss of floodplain storage.</p>	<p>As stated above, this section of coastline is managed by the Environment Agency, located in Flood Zone 3. Therefore, detailed examination of the Flood Risk Assessment (FRA) is outside of ADC's remit. ADC therefore refer to the comments provided by the Environment Agency and West Sussex County Council (WSCC) as the Lead Local Flood Authority.</p> <p>However, the following observations have been made;</p> <ul style="list-style-type: none"> • Within Section 2.3 and Annex A, the document refers to byelaws. Four types of watercourse permission may be required: <ul style="list-style-type: none"> o Ordinary Watercourse consent – See WSCC (Lead Local Flood Authority). Consents administered by ADC on their behalf. o Internal Drainage Board Consent – See Environment Agency. o ADC Byelaw Consent. o Main River Consents – Environment Agency • In figure 26.2.4 "Fluvial Flood Extent", Rope walk and the area south of the A259 on Littlehampton West bank is not shown to be at risk; this is incorrect. The flood cell that covers this area is at risk of flooding from the sea and the river and should be reflected as such in both drawings.

ExA Questions – Historic Environment			Arun District Council's Response
HE 1.3	Heritage Assets Arun DC	Comment upon the Applicants responses to paragraph 2.1.20 of table 2.1 [REP1-017] and response to LIR paragraphs 9.21 & 9.22 [REP2-021] that 45-47 South Terrace is scoped out of effects (table 5.1 Appendix 25.7 settings assessment scoping report vol 4 ES) [APP-213].	<p>No. 45-47 (also identified as 6 St Augustine's Road) (along with 39-44) South Terrace have been scoped out as a result of their distance. However, these buildings have an association with the sea, which is the reason that the buildings were initially constructed – as part of the development of Littlehampton as a seaside resort.</p> <p>As stated in the Local Impact Report, the wind turbine generators would be permanently in views towards the seascape and would result in significant negative visual effects on the coastline of the District. As a result, it is not clear why some of the closest listed buildings would be discounted at stage one. However, the Applicant's response now includes consideration of 45-47 South Terrace (6 St Augustine's Road). ADC would consider it as a Less than substantial harm.</p>
HE 1.4	Locally Listed Buildings Arun DC	Comment upon the Applicants' conclusions on the magnitude of change on The South Terrace Area of Character and the locally listed buildings at 48-95 South Terrace & 16 Granville Road at table 2-1 response to paragraph 2.1.20 [REP1-017] and response to LIR paragraphs 9.21 & 9.22 [REP2-021].	<p>Paragraph 2.1.20 of Table 2.1 [REP1-017] and paragraphs 9.21 [REP2-021] confirms that the Area of Character was not included within the initial assessment, although the adjacent conservation area was assessed. This was therefore a matter of consistency.</p> <p>It is noted that the Area of Character has since been assessed in the Applicant's response to ADC comments in the Local Impact Report. This assessment identifies that the magnitude of change would be the same as for the neighbouring conservation area. Just because the heritage assets are of local importance; it does not reduce the scale of the impact upon their significance i.e. their heritage interest. The majority of the South Terrace has been identified as a variety of heritage assets, albeit in with different classifications – one part is a conservation area with listed and locally listed buildings, whilst the remainder consists of Area of Character and locally</p>

			<p>listed buildings (non-designated heritage assets). As a result, ADC believe that the effect of the Project on the Area of Character would be the same as the neighbouring conservation area.</p> <p>In heritage terms, once any harm has been identified, the level of impact/harm should then be identified. This is then assessed against any public benefits. The current level of impact could be described as being Less than substantial harm – as identified in national policy.</p>
HE 1.5	Heritage Assets Arun DC	Comment upon the Applicant's conclusions on the magnitude of change and resulting significance of effect of the compounds for work numbers 8, 9 and 10 in response to paragraphs 9.4 and 9.7 [REP2-021] upon the Heritage Assets identified in the above LIR paragraphs [REP1-039].	<p>ADC largely agree with the magnitude of change and resulting significance of effect set out in the Applicant's response to the Local Impact Report.</p> <p>ADC notes that moderate adverse effects have been identified as 'Not Significant' in the Applicant's response, although the significance criteria in Table 25-26 of Chapter 25 of the ES identifies moderate as 'potentially significant'. Whilst it is acknowledged that the works would be 'temporary' – the level of time that the compounds would be present, particularly Climping Compound, is not a matter of a few weeks, and the impact would be experienced for some time. The temporary nature should not affect the level of impact. The impact should be assessed on the impact that the compound would have on that element of setting which is considered to contribute towards the significance of the heritage asset.</p> <p>For information, the NHLE reference of The Old Vicarage in the Applicant's response to paragraph 9.4 [REP2-021] is incorrect. The correct NHLE reference is 1027641.</p>
ExA Questions – Noise and Vibration			Arun District Council's Response
NV 1.7	Construction Noise and Vibration	Respond to the Applicant's response contained in [REP2-021] to the issues raised in the LIR [REP1-039], [REP1-044] and [REP1-046] respectively, with regard to	ADC has no further comments regarding noise and vibration following the Applicant's response and further discussions with the Applicant.

	<p>Arun DC</p> <p>Horsham DC</p> <p>Mid Sussex DC</p>	<p>the impact of construction noise and vibration from the Proposed Development on receptors. List any outstanding concerns and provide recommendations for addressing them.</p>	<p>We welcome an outline Noise and Vibration Management Plan being produced for the Examination, to include outline proposals for monitoring and complaints procedure.</p> <p>ADC has requested the potential to secure its cost recovery of monitoring of noise impacts as part of a Section 106 to ensure that the mitigation and monitoring undertaken is acceptable in planning terms and in line with the DCO. No progress has been made on this request.</p>
<p>ExA Questions – Terrestrial Ecology</p>			<p>Arun District Council's Response</p>
<p>TE 1.3</p>	<p>Terrestrial Ecological Surveys and Mitigation for the Whole of the Landward part of the Proposed Development</p> <p>Horsham DC</p> <p>Arun DC</p> <p>Natural England</p> <p>The Environment Agency</p>	<p>Comment on whether remaining concerns exist regarding:</p> <ul style="list-style-type: none"> a) the quality of terrestrial ecological surveys in general undertaken by the Applicant for the whole of the landward part of the Proposed Development? b) the conclusions the Applicant has come to for the terrestrial ecological assessments for the whole of the landward part of the Proposed Development. c) the extent to which the appropriate guidelines and methodologies have been followed by the Applicant when undertaking relevant terrestrial surveys for the whole of the landward part of the Proposed Development. d) the quality and likely effectiveness of the mitigation the Applicant is proposing for potential impacts on terrestrial ecology for the whole of the landward part of the Proposed Development. 	<p>ADC has no further comments.</p>
<p>TE 1.11</p>	<p>Protected Species - Bat Surveys</p>	<p>The Applicant</p> <ul style="list-style-type: none"> a) The ExA requests an update to the Terrestrial Ecology chapter of the Environmental Statement 	<p>ADC has no further concerns regarding the updated bat surveys and mitigation measures.</p>

	<p>The Applicant</p> <p>Natural England</p> <p>Relevant Planning Authorities</p> <p>The Environment Agency</p> <p>SDNPA</p>	<p>[APP-063] to include the information from the document submitted into the examination at the PEPD relating to bat activities, [PEPD-029] Environmental Statement Volume 4, Appendix 22.18: Passive and active bat activity report 2023 Date: January 2024 Revision A.</p> <p>b) State if the information this report provides changes any of the conclusions in the Terrestrial Ecology chapter of the Environmental Statement [APP-063].</p> <p>Natural England, the Environment Agency, Relevant Planning Authorities and SDNPA.</p> <p>c) Confirm if the proposed mitigation measures for bats described in the Outline Landscape and Ecological Management Plan [APP-232] are adequate. If not, are there any other approaches that you consider would be effective in terms of mitigation measures for bats.</p>	
TE 1.26	<p>Amberley Mount to Sullington Hill SSSI and Sullington Hill Local Wildlife Site</p> <p>Natural England</p> <p>Arun DC</p> <p>The Environment Agency</p> <p>SDNPA</p>	<p>The Applicant has stated that surface works through the Sullington Hill Local Wildlife Site (LWS) are being avoided through use of a trenchless crossing.</p> <p>Respond, if required, to the decision of the Applicant to scope out the Amberley Mount to Sullington Hill SSSI, particularly in light of the proximity of the Proposed Development red line boundary to the SSSI and/or the evidence submitted into the Examination at Deadline 1 by Grahame Rhone Kittle [REP1-100] including the discovery of a nationality scarce spider.</p>	ADC has no comment as the Amberley Mount to Sullington Hill SSSI is outside ADC area.
TE 1.28	<p>Potential Terrestrial Ecological Impact</p>	<p>The Applicant</p>	<p>Arun has no other designated sites that would be directly impacted by the Project.</p>

	<p>The Applicant</p> <p>The Environment Agency</p> <p>Natural England</p> <p>Relevant Planning Authorities</p> <p>SDNPA</p>	<p>a) The ExA requests the Applicant to state the estimated worst case duration range for construction activities for:</p> <ul style="list-style-type: none"> i. a 1 kilometre (km) length of open cut cable corridor ii. a trenchless crossing of a watercourse, PRoW or small track <p>b) The ExA requests the Applicant to provide worst case construction duration times marked on a plan in sections along the whole of the cable route, in as much detail as possible. For sections where the time of year construction is undertaken would be a significant consideration, such as sensitive ecological areas, mark on the plan which months or season the construction work is proposed to be undertaken.</p> <p>The Environment Agency, Natural England, Relevant Planning Authorities, SDNPA</p> <p>c) In addition to the Commitment made to seasonal restriction of construction work at Climping Beach (C-217), comment on whether there are any other sensitive areas.</p>	
TE 1.30	<p>Impacts to Ecologically Important and Sensitive Sites: Climping Beach SSSI, Littlehampton Golf Course and Atherington Beach LWS, Sullington Hill LWS, and Ancient Woodland at</p>	<p>Requirements 22 and 23 of the draft DCO [REP2-002] secure a CoCP and onshore Construction Method Statement. The onshore Construction Method Statement (at 2b) restricts access within these sensitive sites.</p> <p>Provide a response to these proposed Requirements, stating any outstanding concerns.</p>	ADC has no further concerns.

	<p>Michelgrove Park and Calcot Wood.</p> <p>Natural England</p> <p>The Environment Agency</p> <p>SNDPA</p> <p>West Sussex CC</p> <p>Forestry Commission</p> <p>Horsham DC</p> <p>Arun DC</p>		
TE 1.33	<p>Stage Specific Landscape and Ecological Management Plans (LEMPs)</p> <p>The Applicant</p> <p>The Environment Agency</p> <p>Local Authorities</p>	<p>The Applicant has stated in the OLEMP [APP-232] that:</p> <p><i>“stage specific LEMPs will be produced by the appointed Contractor(s) following the grant of the Development Consent Order (DCO) and prior to the relevant stage of construction. This will be produced in accordance with this Outline LEMP for approval of the relevant planning authority, prior to the commencement of that stage of works. The stage specific LEMPs for the onshore substation and National Grid Bolney substation extension works shall be developed and submitted for approval alongside the detailed design of this infrastructure.”</i></p> <p>Applicant</p> <p>a) If a significant period elapses between the surveys undertaken for protected species and the start of construction, explain whether it is the intention to re-survey features prior to construction and would the findings be</p>	<p>ADC has no comment regarding a) and b).</p> <p>For c) ADC would advise that if a period greater than one season passes between the stage LEMP and construction then re-surveys for protected species would be required.</p>

		<p>included in the updated stage specific Landscape and Ecological Management Plans.</p> <p>The Environment Agency and Relevant Planning Authorities</p> <p>b) Comment, if required, on the approach put forward by the Applicant regarding the stage specific LEMPs. Explain if concerns remain and what approach is recommended.</p> <p>c) Comment, if required, on the durations between surveys and construction.</p>	
ExA Questions – Water Environment		Arun District Council’s Response	
WE 1.4	<p>Private Water Supplies</p> <p>The Applicant</p> <p>Arun DC</p> <p>The Environment Agency</p>	<p>The Applicant</p> <p>In response to Arun DC’s point 4.14 in its LIR [REP1-039] regarding the monitoring of private water supplies, the Applicant’s responses states:</p> <p><i>“...any additional PWSs identified in the close vicinity of the Proposed Development post-consent will be considered for inclusion in the PWS water quality monitoring programme implemented by environmental measure C-253 in Table 26-20 of Environment Statement Chapter 26: Water environment, Volume 2 of the ES [APP-067] and also the Outline Code of Construction Practice [PEPD-033] secured through Requirement 22 of the Draft Consent Order [PEPD-009].”</i></p> <p>a) The ExA would like to further understand on what basis these water supplies would be considered for inclusion in the water quality monitoring programme.</p>	<p>ADC consider that an appropriate distance would be a minimum of 250m (this equates to an SPZ2 groundwater protection zone).</p> <p>ADC consider that both private and public water supplies meeting this definition should be included in the water quality monitoring programme.</p>

		<p>b) Quantitatively define the phrases “in close vicinity of the Proposed Development” mentioned above and “in proximity of the Order Limits” in Commitment C-253 of the Commitments Register [REP1-015].</p> <p>c) Confirm that Commitment C-253 of the Commitments Register includes both microbial and chemical parameters within the water quality monitoring programme.</p> <p>d) Confirm how long the water quality monitoring programme would continue for.</p> <p>Arun DC, The Environment Agency</p> <p>e) Explain what distance would be considered appropriate for the definition of “in proximity of the Order Limits” in Commitment C-253 of the Commitments Register.</p> <p>f) Explain whether all private and public water supplies meeting this definition, should be included in the water quality monitoring programme as default, unless agreed exempt by the Appropriate Authority.</p>	
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