

Arun District Council
Development Control
1, Arun Civic Centre Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2018/120451/01-L01
Your ref: AL/45/18/PL
Date: 14 June 2018

Dear Sir/Madam

SIDE EXTENSION TO ENCLOSE EXISTING PLANT/ MACHINERY

GLOBAL TECHNOLOGIES RACING LTD DENMANS LANE FONTWELL BN18 0SU

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency Position

We consider that planning permission should only be granted to the proposed development as submitted if the following planning conditions are imposed as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that any contamination identified during the construction works is fully characterised and assessed.

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Advice to Local Planning Authority/Applicant

This site is located close to the boundary of the Lambeth Group and the Chalk, these are overlain by Storm Beach and Head deposits. It lies within a Source Protection Zone 1 for the Eastergate abstraction, which lies approximately 630m south of the site. Therefore this site is very sensitive with regards to any development and groundwater must be protected against pollution.

The proposed development site appears to have been the subject of past industrial activity which poses a *low* risk of pollution to controlled waters. There is no current evidence to suggest that there is any contamination from the current and historical activities on site. However we recommend that developers should:

1. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
2. Refer to the Environment Agency Guiding principles for land contamination for the type of information that is required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

1. Refer to the contaminated land pages on GOV.UK for more information.

Following a site visit we are satisfied with that only clean roof water runoff will be draining to ground. Whilst the application makes reference to a cess pit we understand that foul water is held in a tank and removed from site. Therefore we have no concerns regarding drainage from this application and have the following general advice regarding drainage, given the sensitivity of groundwater beneath this site.

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

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

