





From: Nia Russell 
Sent: 06 October 2017 15:55
To: Michael Eastham
Subject: Re: FRA v4 for BE/102/17/OUT

Michael

Thanks for your reply. I have attached Condition 11 that was proposed to be attached to the LDO for the site.

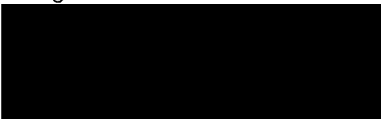
Yes, my client is very concerned about the funding submissions to the LEP which is why there is some panic over the potential delay here.

I would be very grateful if you could give consideration to the principle of conditioning this matter whilst the technical survey results are awaited and the detailed design work undertaken. I am sure that between our respective technical colleagues an appropriate wording could be agreed, based on the work done to date and that instructed to be undertaken shortly.

Kind Regards

Nia

Nia Russell
Associate
Mango Planning & Development Limited
Number One Waterton Park
Bridgend CF31 3PH



On 6 Oct 2017, at 15:42, Michael Eastham <Michael.Eastham@arun.gov.uk> wrote:

Hi Nia,

To speed everything up, please could you send me a copy of Condition 11 of the Draft LDO and if your colleagues have a similarly worded condition then I would be happy to consider that one, too.

As you know, there is a sense of urgency vis a vis the PPA but also the funding submission to the Coast to Capital LEP.

I look forward to receiving the condition(s).

Thanks

Regards,

Michael

From: Nia Russell [REDACTED]
Sent: 06 October 2017 14:46
To: Michael Eastham
Subject: Fwd: FRA v4 for BE/102/17/OUT

Michael

Further to the below, we are very concerned about the ability to get an agreement on these flooding matters in a timely manner to allow the application to be determined in accordance with the timescales of the PPA.

Charlotte doesn't seem to have either the time or resources to review this quickly to allow you to write your committee report.

As you are aware the Local Development Order, if made, would have granted permission in principle for the redevelopment of the site and a great deal of work was undertaken to inform that LDO particularly in terms of flood risk. The LDO then proposed a detailed condition (to be satisfied pre-commencement of development) (Condition 11 of the Draft LDO).

We are still of the view that having regard to the amount of work done to inform the LDO, the level of detail in our revised FRA (that is now with Charlotte for approval) and the technical surveys that have been instructed already, that this matter can be addressed through the imposition of the same or similar condition.

Please could you confirm your view/position in light of Charlotte's comments and her inability to respond quickly on this issue.

Regards

Nia

Nia Russell
Associate

<image001.png>

Begin forwarded message:

From: Charlotte Hardy [REDACTED]
Subject: RE: FRA v4 for BE/102/17/OUT
Date: 6 October 2017 at 13:02:47 BST
To: "karen jenkins" [REDACTED]
Cc: Nia Russell [REDACTED] Michael Eastham <Michael.Eastham@arun.gov.uk>, Will Marsh [REDACTED] "Arfon Hughes" [REDACTED]

Hi Karen

This is just to confirm that I did receive it yesterday and initially opened it to confirm that I could. From remembrance the document was about 100 pages, so hopefully this is the one sent.

I am working on the Local Plan today and the majority of next week so am not going to have the time to fully go over to provide any comments that may be needed until after that at the earliest I am afraid. However, if I get an opportunity and I am needing to be directed to where to look for something I may be in touch before that.

Kind Regards

Charlotte Hardy | Senior Environmental Assessment Officer, Planning, Arun District Council | Location: First Floor, Arun Civic Centre,
Maltravers Road, Littlehampton, BN17 5LP

Internal: 37794 | External: +44 (0) 1903 737794 | E-mail: Charlotte.Hardy@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk  Save the environment - think before you print. <image002.jpg>

From: karen jenkins [REDACTED]
Sent: 06 October 2017 09:47
To: Charlotte Hardy
Cc: Nia Russell; Michael Eastham; Will Marsh; Arfon Hughes
Subject: FRA v4 for BE/102/17/OUT

Charlotte,

Just a follow up from my voicemail this morning. Hopefully you received the revised FRA yesterday. If not please let me know ASAP and I will arrange to send it in an alternative format.

Many Thanks

Karen Jenkins
Director

kirksaunders

associates

w: www.kirksaunders.co.uk

a: Templegate House, 115-123 High Street, Orpington, Kent BR6 0LG

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	Condition	Reasons
	implemented prior to the commencement of any new development hereby permitted.	
11	<u>Sustainable Drainage</u> No development shall be begun until a scheme for the foul and surface water drainage for the site has been submitted to and approved in writing by the local planning authority. The scheme shall: i) Be carried out in accordance with the approved Enterprise at Bognor Regis Flood Risk Assessment (ADC/WSP) (April 2015), in particular the Indicative Surface Water Drainage Strategy and Flood Risk Management Measures ii) Specify the range of measures used to manage surface water run off including Sustainable Urban Drainage (SUDs) systems. iii) Ensure safe access and egress from and to the site iv) Demonstrate that sufficient foul and surface water capacity exists or will be provided both on and off site, to include the provision of pumping stations and access to the public sewerage system.. v) Set out pollution prevention measures including the measures used to reduce the potential for pollutants reaching ground, surface water bodies or the surface water drainage system, in particular measures for oil interception. vi) Provide for the provision and management of buffer zones alongside sensitive ecological zones, watercourses, ponds and wetland within and bounding the "red line" boundary of the LDO. vii) Include how the scheme shall be maintained and managed. viii) Include a timetable for implementation The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the Local Planning Authority. INF 4: Foul Drainage. INF 5: SUDS INF 6: Flood Risk. INF 7: Oil/Chemical Storage Tanks. INF 8:	To prevent pollution of groundwater in accordance with Arun District Local Plan policies GEN7 and GEN31. In accordance with policies GEN7 and GEN11 of the Arun District Local Plan. To ensure the satisfactory drainage of the development and ensure the implementation of pollution prevention measures. To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site. To ensure safe access and egress from and to the site. To reduce the risk of flooding from blockages to existing drainage systems.). To reduce the impact of flooding on the proposed development and future occupants. To protect and enhance ecological assets: Development that encroaches on watercourses, ponds, wetlands can have a potentially severe impact on their ecological value. This is contrary to government policy in the NPPF and the UK Biodiversity Action Plan. Land alongside watercourses, wetlands, ponds is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change.

	Condition	Reasons
	Trade Effluent. INF 9 Development within 8 metres of a main river:	
12	Construction Methods: Piling /Foundations/ Penetrative methods not permitted Construction methods that include : Piling / investigation boreholes / tunnel shafts / ground source heat pump systems using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.	To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution in accordance with the NPPF (Paras 120 and 144). To prevent pollution of groundwater in accordance with Arun District Local Plan policies GEN7, Policy GEN26 and GEN31.
13.	Land Contamination With the exception of minor works, not involving groundworks, the development shall not be occupied within the LDO area until the following phased Contaminated Land Risk Assessment has been carried out by a competent person in accordance with Defra and the Environment Agency's 'Model Procedures for the Management of Contaminated Land, CLR 11': 1. Phase 1* – a desk study and site walk over to identify all potential contaminative uses on site and to inform a preliminary assessment. If potential contamination is identified then Phase 2 shall be undertaken. 2. Phase 2 – a comprehensive intrusive investigation to identify the type, nature and extent of contamination present, the risks to users/occupiers of the development, and to inform the required remediation scheme. If significant contamination is found then Phase 3 shall be undertaken. 3. Phase 3 – the production of a Remediation Report to ensure the site is rendered suitable for its proposed use. The Remediation Report shall include works to be carried out and a programme of such works, and shall first have been submitted to	To ensure that any ground, water and associated gas contamination is identified and all necessary remediation works are carried out in the interest of the safety of the development and the environment, and to ensure the site is suitable for the proposed use To ensure that the development complies with approved details in the interests of protection of the environment and prevention of harm to human health in accordance with Arun District Local Plan policies GEN7 and GEN31. To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF. The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any