

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

Our ref: HA/2017/119264/01-L01
Your ref: BE/27/17/DOC
Date: 11 April 2017

Dear Sir/Madam

APPLICATION FOR APPROVAL OF MATTERS RESERVED BY CONDITION IMPOSED UNDER BE/120/15/OUT RELATING TO CONDITIONS 5-SURFACE WATER DRAINAGE, 6- MAINTENANCE & MANAGEMENT OF SUDS SYSTEM, 7- CONSTRUCTION MANAGEMENT PLAN, 8-PILING & FOUNDATION DESIGNS & 11- CONTAMINATION.

FORMER LEC REFRIGERATION SITE, SHIPNEY ROAD, BOGNOR REGIS, PO22 9NG.

Thank you for your consultation regarding the above which was received on 24 March 2017.

Environment Agency Position

Condition 5 and Condition 6

We have reviewed the surface water drainage scheme and maintenance plan. Sufficient pollution prevention measures have been incorporated into the scheme to minimise the impact upon the water environment. The maintenance plan is very detailed and provides assurances that the drainage scheme can be managed appropriately to reduce pollution.

We therefore support the proposals and recommend the discharge of condition 5 and 6 attached to the planning permission BE/120/15/OUT.

Condition 7 - Construction Management Plan (CMP)

We cannot recommend the discharge condition 7 attached to the planning permission BE/120/15/OUT. Further pollution prevention measures and details need to be incorporated in to the CMP.

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

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The CMP provides very basic pollution prevention measures during construction. In particular, the proposed disposal of wheel wash water to ground presents a risk to groundwater quality, and the following should be addressed:

- There should be no discharge of any silty water without prior treatment to settle or remove suspended solids. If acknowledged that activities will be generating silty water, suitable means to treat the water before discharge should be identified.
- Run-off should be collected in a sump, with settled solids removed regularly and water recycled and reused where possible.
- In addition to surface water, the CMP has only one line entry for the storage of chemicals oils and fuels. No pollution prevention measures have been detailed regarding their use and in particular there is no Pollution Incident Plan and measures if a pollution incident occurs how this will be dealt with.

Though withdrawn, the guidance document working at construction and demolition sites: **PPG6** Pollution Prevention Guidelines provides a lot of advice to prevent pollution from development such as this.

In addition to this, Construction industry research and information association (CIRIA) - Environmental Good Practice on Site, 3rd Edition, 2010 is also a useful guide.

Condition 8 and Condition 11

We can recommend the discharge of conditions 8 and 11 attached to the planning permission BE/120/15/OUT.

We have reviewed the submitted information in relation to the proposed development and have the following detailed comments:

The site is reported to have been used as an administrative building to the LEC Refrigeration Factory. The manufacturing activities were undertaken to the south of the site where the Sainsbury's superstore is now located.

The Enzygo Ltd Ground Investigation report dated August 2016 provides a summary of the groundwater investigations undertaken at the former Widdowson building. This involved soil and groundwater sampling across the site.

The report states remedial works was agreed and that Environment Agency confirm that the site no longer poses potential risk to controlled waters (groundwater and surface water) from shallow soils. The deep Chalk aquifer beneath the site and surrounding area is reported to be impacted by chlorinated solvents originating from the LEC Factory. In addition to this no additional monitoring or remediation of the solvents within the Chalk Aquifer is identified by the Environment Agency.

It should be noted that the Widdowson Building was not part of any redevelopment works at the time and none of the conclusion made by the Environment Agency are associated with the Widdowson Building. Therefore the above statements are not related to this site.

It is noted that very low levels of chlorinated solvents were identified within soil samples in addition to the reported low levels of PAH and hydrocarbons. However, overall do not pose a significant risk to the water environment and we do not require any specific

remediation to be carried out based on the environmental setting and proposed development and end use.

We support the recommendation made in the report for a discovery strategy if further contamination is identified during any works. We also agree to the proposed piling works based on the assessment carried out. We agree that the piling proposals do not present a significant risk to the water environment.

It should be noted that there is widespread chlorinated solvent contamination in groundwater across the area. In addition to this there are some areas that have not been fully investigated and there may be sources of solvent contamination that may be continuing to pollute the groundwater. The Widdowson building is not believed to be one of these areas.

Should you have any further queries please do not hesitate to contact me on the number below.

Yours faithfully

Mrs Charlotte Lines
Senior Planning Advisor



cc WYG