

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

**Our ref:** HA/2019/121101/01-L01  
**Your ref:** CM/4/19/PL  
**Date:** 01 March 2019

Dear Sir/Madam

**Construction of a crematorium comprising of a crematorium building & associated structures, car parking, access & landscaped spaces. This application is a departure from the development plan**

**Land South of the A259, Grevatt's Lane, Climping, BN17 5RE**

Thank you for consulting the Environment Agency on the above application.

#### **Environment Agency Position**

We have **no objection** to the proposed development as submitted, **subject to the inclusion of the following 4 conditions**, in any permission granted.

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

#### **Condition 1 - Previously Unidentified Contamination**

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 a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

#### **Reason**

To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

#### **Condition 2 - Piling**

Piling & investigation boreholes using penetrative methods shall not be carried out other

Environment Agency

Canal Walk, ROMSEY, Hampshire, SO51 7LP.

Customer services line: [REDACTED]

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

**Reason**

To protect the principal aquifer from contamination in line with paragraph 170 of the National Planning Policy Framework.

**Condition 3 - Non-mains drainage**

The development hereby permitted may not commence until a foul water drainage scheme has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented as approved and completed prior to the development being brought into use.

**Reason**

To ensure that the proposed non-mains drainage system does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework.

**Condition 4 – Implementation of Flood Risk Assessment**

The development shall be carried out in accordance with the submitted flood risk assessment (ref 402.05324.00005 version 4 January 2019) and the mitigation measures it details

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

**Reason**

To reduce the risk of flooding to the proposed development and future occupants in line with section 9 of the Planning Practice Guidance of the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

**Advice to Local Planning Authority/Applicant**

Non mains drainage

We have reviewed the Planning Statement and support the comments in section 6.59 that foul water will be discharged to a Package Treatment Plant and drainage field. This makes reference to the Drainage Strategy but we have been unable to locate this on the planning portal. We support the use of an adequately sized and designed drainage field in line with BS6297:2007.

The applicant should note groundwater flow rates within Chalk can be in excess of 1km/day which would increase the risk to any groundwater abstraction.

Please note that this development may require an Environmental Permit, a variation of an existing permit or an exemption from an Environmental Permit from the Environment Agency. The applicant must ensure that the operations at the site are in accordance with the Environmental permitting regulations 2008. The applicant is advised to contact the national Customer contact centre on [REDACTED]

The need for an environmental permit is separate to the need for planning permission. The granting of planning permission does not necessarily lead to the granting of a permit.

Groundwater

The site is green field and is located upon River Terrace deposits overlying undifferentiated Chalk, designated as a principal aquifer in the area.

There is a groundwater abstraction within 500m of the site and there is the potential for solution features within the Chalk beneath the site.

#### Piling

Piling & investigation boreholes using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways.

Groundwater is particularly sensitive in this location because the proposed development site is located upon a Principal aquifer.

#### Flood Risk

According to Environment Agency flood maps, the proposed development is sited within the far extremities of a tidal flood risk area.

Whilst the FRA has assessed tidal flood risk impacts based on a breach in the defences at Climping, the actual risk to the site would be from a breach in the defences at Elmer.

Climate change figures for 2115 (4.94mAOD) are almost identical, and furthermore the Elmer sea defence frontage is to be further upgraded this year, so the development is better protected from this frontage.

However on the basis, that the proposal is assessed based on the absence of defences provided that the building can be made flood resilient in accordance with the <http://www.communities.gov.uk/publications/planningandbuilding/improvingflood>

With regards to fluvial flood risk we acknowledge that the risk is low. However the most southerly part of the site could be prone to waterlogging during periods of prolonged rainfall.

The site is bounded to the south by the Ryebank Rife a classified 'main river' under the jurisdiction of the Environment Agency and subject to its byelaws. Any works in under or over the Ryebank Rife (including hedge and tree planting) or within 8metres from the bank edges, a Flood Risk Activity Permit (FRAP) will be required. For further information, and to obtain any necessary permit forms, please contact [REDACTED]

Similarly to the west of the site there is an 'ordinary watercourse'. It is noted that the site entrance will need to cross this watercourse, and there are also proposals to construct a new ditch on the layout plan SC-CLMPG-V1-XX-DR-K-0500, for which the detail is unclear.

Any works in under or over the said ditch or within 3-5metres from the bankside edges, a flood Defence consent will be required from the Lead Local Flood Authority (LLFA)

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

**Miss Suz Greenwood**  
**Planning Advisor, Environment Agency**

End