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From: 

Sent: 14 March 2018 12:46

To: Planning.Responses

Subject: Environment Agency Response to: FG/206/17/PL

The proposal has been reviewed and I enclose the Environment Agency's comments on:
Land at Asda Superstore Littlehampton Road Ferring BN12 6PN

LPA ref: FG/206/17/PL

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

Our ref: HA/2018/120208/01-L01
Your ref: FG/206/17/PL
Date: 14 March 2018

Dear Sir/Madam

INSTALLATION OF A SIX PUMP (12 FILLING POSITION) PETROL FILLING STATION, DRIVE-TO- PAY KIOSK & ASSOCIATED WORKS INCLUDING JET WASH, AIR/ WATER SERVICES & VACUUM EQUIPMENT

LAND AT ASDA SUPERSTORE LITTLEHAMPTON ROAD FERRING BN12 6PN

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

We have reviewed the information submitted and discussed some of the design and environmental protection details with CA Design Limited and have the following comments to make.

Environment Agency Position

We consider that planning permission could be granted to the proposed development 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 recommend an objection to the application.

We ask to be consulted on the details submitted for approval to your Authority to discharge these conditions and on any subsequent amendments/alterations.

The site is underlain by a Secondary A aquifer (River Terrace Deposits) followed by a Principal aquifer (Undifferentiated Chalk Formation). Groundwater levels are also shallow within the area. The environmental sensitivity at the site is therefore considered to be very high. The future use could present potential pollutant linkages to the water environment. Consideration for the risk posed by surface water drainage will also need to be undertaken.

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

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The development hereby permitted shall not be commenced until such time as a scheme to install, monitor and maintain the underground tanks has been submitted to, and approved in writing by, the local planning authority.

The scheme shall include the full structural details of the installation, including details of excavation, the tank(s), tank surround, tertiary containment, associated pipework, monitoring system and maintenance, monitoring & sampling schedule. The scheme shall be fully implemented and the tanks and associated infrastructure subsequently maintained and monitored, in accordance with the scheme, or any changes as may subsequently be agreed, in writing, by the local planning authority.

Reason

To protect and prevent the pollution of the water environment from potential pollutants associated with proposed land uses in line with National Planning Policy Framework (NPPF; paragraphs 109, 120 and 121), EU Water Framework Directive, and Environment Agency Groundwater Protection Position Statements (2017) D2 and D3.

The proposed design of the underground tanks is inadequate. As the proposed tanks are to be developed below ground, groundwater levels may be such that they are sited below the groundwater table. We therefore recommend that the applicant addresses this environmental risk, particularly with our Position Statement D2 and present a design that mitigates against any future pollution.

The development hereby permitted shall not be occupied until such time as a validation report has been completed, which includes evidence that the tanks and associated infrastructure have been completed in accordance with the scheme approved under condition 1. The validation report should be submitted to, and approved in writing by, the local planning authority.

Reason

To protect and prevent the pollution of the water environment from potential pollutants associated with proposed land uses in line with National Planning Policy Framework (NPPF; paragraphs 109, 120 and 121), EU Water Framework Directive, and Environment Agency Groundwater Protection Position Statements (2017) D2 and D3.

The proposed design of the underground tanks is inadequate. As the proposed tanks are to be developed below ground, groundwater levels may be such that they are sited below the groundwater table. We therefore recommend that the applicant addresses this environmental risk, particularly with our Position Statement D2 and present a design that mitigates against any future pollution.

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 protect and prevent the pollution of the water environment in line with National Planning Policy Framework (NPPF; paragraphs 109 and 121), EU Water Framework Directive, and Environment Agency Groundwater Protection Position Statements (2017) A4 – A6, J1 – J7 and N7.

No drainage systems for the infiltration of surface water drainage into the ground is 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 the water environment. The development shall be carried out in accordance with the approval details.

Reason

To protect and prevent the pollution of the water environment in line with National Planning Policy Framework (NPPF; paragraphs 109, 121), EU Water Framework Directive, and Environment Agency Groundwater Protection Position Statements (2017) G1, G9 to G13, N7 and N10. The water environment is potentially vulnerable and there is an increased potential for pollution from inappropriately located and/or designed infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins.

The drainage strategy presented isn't clear and we recommend that any drainage from hazardous areas such as the forecourt are drained in to the foul sewer.

The development hereby permitted shall not be occupied until such time as a Environmental Management System (EMS) has been developed and shall be approved by the local planning authority.

Reason

To protect and prevent the pollution of the water environment in line with National Planning Policy Framework (NPPF; paragraphs 109, 121), EU Water Framework Directive.

One of the main means of showing that a facility is being operated in an environmentally responsible manner would be the incorporation of the operation control procedures in an Environmental Management System (EMS) for the facility.

The main elements of an EMS should include:

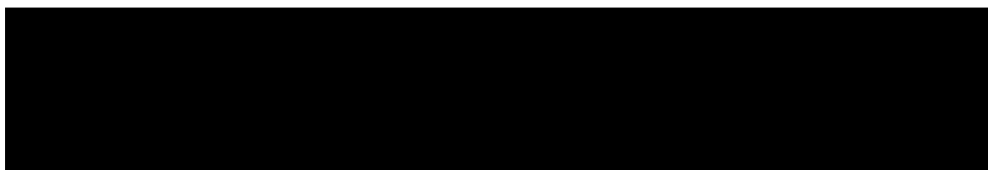
- Establishing an environmental policy
- Planning the implementation of the policy
- Implementation and operations
- Checking and corrective action
- Management review

In addition to including details of operating procedures, an EMS should include details of training and emergency response procedures and plans for upgrading the engineering requirements of the facility.

Please do not hesitate to contact me on the number below should you have any queries.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency



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