

Mr D Easton
Arun District Council
Arun Civic Centre (1) Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2018/120913/01-L01
Your ref: F/19/18/EIS
Date: 06 December 2018

Dear Mr Easton

SCOPING OPINION FOR DEVELOPMENT OF UP TO 1,500 DWELLINGS, UP TO 37,000 SQM OF EMPLOYMENT FLOOR SPACE, A LOCAL CENTRE INCLUDING RETAIL, COMMERCIAL AND COMMUNITY FACILITIES, PRIMARY SCHOOL, NURSERY, A CARE/RETIREMENT HOME, HEALTHCARE FACILITIES, PUBLIC OPEN SPACE, NEW SPORTS PITCHES AND FACILITIES, & ASSOCIATED ACCESS, INFRASTRUCTURE, LANDSCAPE & ANCILLARY WORKS

FORD AIRFIELD FORD

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

According to our Flood Map for Planning (Rivers and the Sea) the site is located mainly in Flood Zone 1 (Low Risk) with a small portion along the northern boundary in Flood Zone 3 (High Risk).

We would expect the Flood Risk Assessment (FRA) to consider flooding from rivers and the sea as well as a range of other sources (for example surface water, groundwater, drains/ordinary watercourses) and to demonstrate how flood risk will be managed now and over the development's lifetime, taking climate change into account.

Please note that UKCP18 was published on 26th November 2018. UKCP18 is the official source of information on how the climate of the UK may change over the rest of this century. The UKCP18 projections replace the UKCP09 projections.

The allowances in 'Flood risk assessments: climate change allowances' (<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>) (published Feb 2016) are still the best national representation of how climate change is likely to affect flood risk for:

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line [REDACTED]
www.gov.uk/environment-agency

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- peak river flow
- peak rainfall intensity

Research that is due to be published in 2019 may result in changes to these allowances.

West Sussex County Council (the LLFA) and Arun District Council engineers should be consulted throughout the planning process to provide additional information on localised flooding problems and the surface water drainage strategy.

The previous use of the proposed development site as a WWII Former Airfield presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive at this location because the proposed development site is located upon the Newhaven Chalk Formation which is designated a principal aquifer. In addition groundwater is likely to be relatively shallow, approximately 5 meters below ground level.

We have reviewed the EIA Scoping Report dated November 2018. We support the statement in section 2.3 for the requirement for ‘further investigation to fully characterise the ground conditions across the site’. We note that this is to be scoped out of the ES. While the investigations to date have not identified significant levels of contamination, the previous use of the site as a Former Airfield presents a medium risk of contamination which could be mobilised during the redevelopment of the site and result in pollution of controlled waters. We would advise that a full intrusive site investigation, remediation and verification strategy are included as required in order to mitigate the risks to groundwater.

National Planning Policy Framework (NPPF) paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of 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).

Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development (in line with Paragraph 121 of the NPPF). Our minimum requirements for submission with a planning application are a desk study and preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may be required for submission with a planning application for sensitive land use types or where significant contamination or uncertainty is found.

The National Planning Policy Framework does take a precautionary approach to land contamination and therefore it is not unreasonable for the local planning authority (LPA) to request an up to date history of the site from the developer in order to ensure that they can be satisfied that any investigations and proposed remediation are effective and necessary. Ultimately it is for the developer to satisfy the LPA and therefore the LPA should have the final say on the requirements for documents submitted for planning applications.

The developer should address risks to controlled waters from contamination at the site, following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.”

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with:

- BS 10175:2011 A1:2013 *Code of practice for the investigation of potentially contaminated sites.*
- BS ISO 5667-22:2010 *Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points*
- BS ISO 5667-18:2001, BS 6068-6.18:2001 *Water quality. Sampling. Guidance on sampling of groundwater at contaminated sites*

The proposed content of the ES states that section 14 will include an assessment of the effects on water quality from drainage. We support this and advise that provision needs to be made for the drainage of both foul and surface water to ensure the appropriate mitigation measures are taken to protect the underlying aquifer.

Foul water should be discharged where reasonably possible to the public foul sewer. If connection to the mains is not feasible and discharge associated with this development will require an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2016, from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted. Additional 'Environmental Permitting Guidance' can be found at: <https://www.gov.uk/environmental-permit-check-if-you-need-one>.

Whilst we would not object to the use of SuDs, suitable levels of pollution prevention measures need to be implemented into the drainage design to ensure that groundwater and drinking water supplies are protected. Ciria SuDs manual C753 provides details on industry best practice. 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/>

The scoping report does not mention the risks to water quality from piling this should be considered as piling and 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. If piling is to be installed on site we would require a piling risk assessment to be submitted to guarantee that the development will not present unacceptable risks to groundwater resources.

Yours sincerely

Miss Suz Greenwood
Planning Advisor, Environment Agency

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