

Arun District Council - Planning Policy
MALTRAVERS ROAD,
LITTLEHAMPTON, BN17 5LF

Reference: HA-2024-126389/02
Customer reference: LU/301/24/PL
30 July 2026

**Approval of details reserved by condition under LU/301/24/PL relating to condition 3-
Verification Report of Remediation.**

Former Gasholder Harwood Road Littlehampton BN17 7AU

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation LU/301/24/PL.

We have reviewed the submitted validation report, but are not able to agree to the discharge of the validation condition, based on the contents of the report. Details for reasoning is provided below.

We welcome the remediation works undertaken at the site and acknowledge that the works have resulted in betterment and a reduction in residual risks to controlled waters associated with the former gasworks site. The verification report demonstrates that a substantial proportion of the remediation strategy has been implemented, including excavation and removal of contaminated materials from the identified remediation areas, installation of the clay cut-off wall within Area C, reinstatement using imported materials, and completion of the proposed groundwater monitoring programme.

We note that verification sampling undertaken within Area C (former retort house / NAPL source area) identified residual contamination within some validation samples, including observations of tarry liquid with sheen within the northern boundary excavation prior to installation of the clay cut-off wall. However, the report does not describe or record the presence of gross contamination or recoverable NAPL remaining within the excavation base or sidewalls following completion of the remedial works and cut-off wall. Furthermore, the excavation and reinstatement works undertaken within Area C appear broadly consistent with the requirements



and objectives of the approved remediation strategy, which sought to remove gross contamination and reduce risks to controlled waters through source removal and installation of the clay cut-off wall. On this basis, we are satisfied that this element of the remediation has been completed broadly in accordance with the approved strategy.

However, we remain concerned regarding the remediation works undertaken within Area B (the former below-ground gasholder tank). The approved remediation strategy required excavation of the tank contents and removal of the steel gasholder structure. During the works, the report indicates, that following instruction from a project manager the steel tank walls and base were retained in situ.

The report further records that:

“Two pockets of tar were observed to be leaching through the made ground adjacent to the locally broken-down cast-iron tank wall.”

This observation is of particular concern, as it indicates the potential presence of gross contamination associated with, or beyond, the retained gasholder structure. By retaining the former gasholder structure in situ, it has not been possible to verify the condition of material immediately outside the tank walls, nor to demonstrate whether gross contamination remains present in these areas or the extent of any such areas. Consequently, we consider this to be a significant departure from the approved remediation strategy. The available information does not provide sufficient evidence to demonstrate that contamination associated with this principal source area has been adequately characterised, removed, or rendered acceptable from a controlled waters perspective.

Whilst we acknowledge the significant betterment achieved by the wider remediation works and agree that the works have reduced risks to controlled waters across much of the site, we are unable to conclude that the remediation objectives for Area B have been satisfactorily achieved. As such, we are unable to accept the verification report in its current form.

We therefore require the applicant to provide a strategy to address this issue, and provide verification that no significant contamination remains beyond the tank walls.

If you have any questions regarding our response, please contact

[REDACTED]

Yours sincerely,

Suz Greenwood,

[REDACTED]

[REDACTED]

Romsey Depot, The Gables, Canal Walk, Romsey, Hampshire, SO51 7LP

[REDACTED]

From: Elaine Walby on behalf of Planning.Responses
Sent: 31 July 2026 16:40
To: Planning Scanning
Subject: FW: LU/301/24/PL - EA response
Attachments: Response 30-07-2026.pdf

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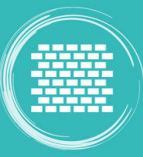
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From: [REDACTED]
Sent: 30 July 2026 13:10
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: LU/301/24/PL - EA response

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Approval of details reserved by condition under LU/301/24/PL relating to condition 3- Verification Report of Remediation.

Former Gasholder Harwood Road Littlehampton BN17 7AU

Dear Planning Officer,

Find attached a Planning Application response to your consultation 'LU/301/24/PL'.

We have outlined any objections, conditions or informatives that are necessary for your application. if you have any questions regarding our response, please contact

[REDACTED]

Yours sincerely,
Suz Greenwood

[REDACTED]

Romsey Depot, The Gables, Canal Walk, Romsey, Hampshire, SO51 7LP

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