

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

**Our ref:** HA/2017/119575/01-L01  
**Your ref:** LU/94/17/OUT  
**Date:** 18 July 2017

Dear Sir/Madam

**OUTLINE APPLICATION WITH ALL MATTERS RESERVED FOR RESIDENTIAL RE-DEVELOPMENT COMPRISING OF 10 NO. DWELLINGS & ASSOCIATED WORKS (RESUBMISSION FOLLOWING LU/327/16/OUT) WESTHOLME NURSERY TODDINGTON LANE, LITTLEHAMPTON, WEST SUSSEX, BN17 7PP.**

Thank you for your consultation on the above application. Please quote our above reference on any other correspondence.

**Environment Agency Position**

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

**Condition**

The development hereby permitted shall not be commenced until such time as a scheme to dispose of foul drainage has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

**Reasons**

In accordance with paragraph 109 and 120 of the National Planning Policy Framework and paragraph 020 of the Planning Practice Guidance the first presumption for any development is that they should provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works. Only where having taken into account the cost and/or practicability it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible, should non-mains foul sewage disposal solutions be considered.

Environment Agency  
Portfield Depot Oving Road, Chichester, West Sussex, PO20 2AG.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

We note that this development proposes to dispose of foul drainage through an on-site package treatment plant. Considering the current location of the mains sewer network and the size of this development this approach may be appropriate, however, we are aware that the larger development at Toddington Nurseries is currently being built out in close proximity to this site. When occupied the development will provide a public mains sewer network nearer to this site which would make a connection here more appropriate.

We consider that through the reserved matters application further consideration should be given to the proposed method of foul drainage and where possible seek to connect to the public foul sewer.

**Information for applicant / LPA**

Please note that the discharge of treated sewage effluent requires a Permit from the Environment Agency under the Environment Permitting Regulations, 2010. A detailed assessment of information provided of treatment for foul drainage will be undertaken as part of the permitting process. This will include a thorough assessment of the justification for non mains drainage. The environmental acceptability of the discharge on the receiving waters will also be fully determined as part of the permitting process. An application for an Environmental Permit will be determined in accordance with Defra guidance and there are therefore no guarantees a Permit will be granted. A Permit will be refused if the environmental impacts are unacceptable or where we consider a connection to the mains sewer network is appropriate.

Yours faithfully

**Hannah Hyland**  
**Planning Specialist**

