

[REDACTED]

From: Giacomelli, Alison (NE) [REDACTED]
Sent: 10 April 2017 15:21
To: Richard Temple
Subject: RE: P/76/16/PL Barfoots of Botley, Sefter Farm, Pagham CONSULT

Dear Richard,

Thanks for discussing this case on the phone with me today. I've tried to ring Tom Day at Chichester but he is out of the office until 19 April now.

From my reading of the application documents, the issue is potential water quality impacts on the Pagham Harbour Special Protection Area (SPA). Risk to water quality during construction can be addressed by the Construction Environment Management Plan as Tom suggests.

During operation, the Flood Risk Assessment (FRA) indicates that surface run-off from loading bays and access road will go through petrol interceptors and then the storage reservoir, and run-off from roads will go straight into the reservoir. The FRA also says that the full extent of the drainage infrastructure will be confirmed at detailed design and may include SuDS techniques. As mentioned on the phone, I am happy with

the proposed method of addressing surface water run-off from roofs and hardstanding. Though if the detailed design includes any additional SuDS measures, then that may provide further treatment and reduce the risk to the SPA further.

However, I am not clear on how any water used in the packing plant itself will be treated and discharged. I would be concerned if this were to be discharged to Pagham Rife without any treatment. Therefore, if the applicant/agent could confirm whether water used in the packing plant will be discharged to the public sewer, re-used in some way, or discharged to a SuDS system and then to Pagham Rife, that would be helpful. If the water is going to be treated on site through SuDS, I suggest that approval of the detailed design of the drainage strategy should be a pre-commencement condition, and that the strategy should demonstrate how water quality impacts on the Rife will be avoided (perhaps through reference to the water quality (chapter 26) of the CIRIA SuDS manual). This is required to show that there will not be a likely significant effect on the SPA under the Habitats Regulations. As Tom points out, it is important to have certainty over whether the water quality measures will be sufficient to avoid an impact on the SPA before work starts, so that the design can be altered if necessary.

As discussed on the phone, as the reedbed is upstream of the packing plant it will not address water quality impacts from the plant. However, if it is intercepting nutrient-laden run-off from adjacent fields which would otherwise enter the Rife, then this will be of benefit to the SPA downstream, and could be considered an enhancement.

I hope these comments are helpful.
Regards,
Alison

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