

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

Our ref: HA/2019/121404/03-L01
Your ref: WA/48/19/RES
Date: 29 September 2020

Dear Sir/Madam

AMENDED AND NEW PLANS - APPROVAL FOR RESERVED MATTERS FOLLOWING OUTLINE PERMISSION WA/22/15/OUT COMPRISING 400 NEW HOMES (INCL. AFFORDABLE), 360SQM OF RETAIL SPACE (A1 TO A3), 152SQM OF COMMUNITY SPACE (D1 TO D2 & INCLUDING RETENTION & REFURBISHMENT OF 12SQM 'OLD SMITHY'), DEMOLITION OF REMAINING BUILDINGS TO ARUNDEL ROAD ALONG WITH PUBLIC OPEN SPACE, LEAP, MUGA, ALLOTMENTS, CAR & CYCLE PARKING, DRAINAGE & ASSOCIATED WORKS - THIS SITE ALSO LIES WITHIN THE PARISH OF EASTERGATE LAND TO THE EAST OF FONTWELL AVENUE FONTWELL

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency Position

We have reviewed the Drainage Strategy and SUDS Statement (June 2020). This development is sited in a very sensitive groundwater location, with part within a source protection zone 1 and the remaining area in a source protection zone 2. We support the use of the CIRIA SuDS Manual and the Simple Index Approach to calculate the pollution prevention measures required and the need for a Maintenance Plan in any application to discharge the condition.

We would like to highlight the requirement for the applicant to demonstrate why a deep system is the only feasible option and to justify why a shallower system could not be installed.

Our position statement is copied below but given how shallow the groundwater is, there is the potential for a direct discharge, which we would be strongly against and unlikely to

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.



support given the proximity to Portsmouth Waters abstraction.

The Environment Agency will only agree to the use of deep infiltration system for surface water or sewage effluent disposal if the developer can show that all of the following apply:

- The discharge to groundwater is indirect (with the exception of clean uncontaminated roof water to ground*
- There are no other feasible disposal options such as shallow infiltration systems or drainage fields/mounds that can be operated in accordance with the appropriate current British Standard 6297:2007 A1:2008.*
- The system is no deeper than required to achieve sufficient soakage*
- Acceptable pollution control measures are in place*
- Risk assessment demonstrates that no unacceptable discharge to groundwater will take place – in particular inputs of hazardous substances to groundwater will be prevented*
- There are sufficient mitigating factors or measures to compensate for the increased risk arising from the use of deep structures*

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

