

## Shoreham Cement Works Area Action Plan Issues & Options

### Summary of Responses

#### Chapter 5C: Water & Drainage

There were a total of 6 responses to this chapter (5C). These consisted of 6 general comments on the chapter (5C) and 0 responses to the question (there were no questions attached to this section).

There were a total of 6 general comments on this chapter. These are summarised below..

#### National Agencies

There were 2 responses from the Environment Agency (one from Chichester and one from Adur/Arun). The responses cover the following issues:

1. Potential impacts on water quality in the River Adur must be considered. The proposal should consider impacts on the wider Adur and Ouse catchment as far as reasonably practicable, including how it links/contributes to the objectives in the South East River Basin Management Plan and Adur & Ouse Catchment Management Plan.
2. The site is located on the chalk aquifer, which is designated as a Principal Aquifer. This designation highlights its importance as a strategic water resource and the need for it to be protected from contamination. The area is not within a Source Protection Zone but there are two current licenced abstractions associated with the cement works (licence 10/41/311002), and the River Adur runs along the western boundary of the site. Therefore, controlled waters need to be protected.
3. Section 5C includes consideration of surface water drainage, and while we would encourage the use of SuDS where ground conditions are suitable, it will need to be demonstrated that it does not increase the risk of contamination being mobilised to impact controlled waters.
4. Foul water drainage is included in Section 5C, where it states there is currently no mains foul sewer connection in this location. For a development of this size, the discharge of foul water is an important consideration. Government guidance contained within the National Planning Practice Guidance.
5. We would encourage early consideration of how foul water will be managed for the proposed development and if necessary, early engagement with us if a permit is likely to be required. We note that all foul water drainage will go to the lowest point (Riverside). The impacts on the receiving waterbody (the River Adur) must be considered.
6. It is stated in the AAP (Section 5.42, page 41) "It is likely that the Riverside is suitable for housing or commercial/retail development. It may be the preferred location for the WTW or pumping station." Any works will need consideration for eel. Should a pumping station be installed, this will require eel screening to prevent eel from being drawn into the pumping station itself. Eel screening requirements will also be required for any works where pumping, land drainage or desilting activities are likely to be completed immediately in the area surrounding the River Adur.
7. We consider the site to be at very low risk of flooding from rivers and the sea with all but the western fringes of site A in Flood Zone 1. Provided development is located in Flood Zone 1, and current allowances for climate change are considered, we believe fluvial and tidal flood risk can be managed appropriately.
8. Do the plans have these failings in consideration for an upgrade or maintenance to maintain the flood defence and erosion on these parts.

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#### **District, Borough, City and County Councils**

West Sussex County Council has made comments as follows:

1. The site is, predominantly, at 'very low risk from surface water flooding'.
2. Localised Surface Water flood risk, associated management will need to be considered in detail within the specific development areas. The South Downs National Park Updated Level 1 and Level 2 SFRA identifies Shoreham Cement Works as being in an area susceptible to groundwater flooding due to the underlying geology (Alluvium deposits overlying Chalk) and its proximity to the River Adur which could result in tidal locking preventing the drainage of groundwater.
3. WSCC as the Lead Local Flood Authority concurs with the statement in the Drainage and Flood Risk Report that "The SFRA identifies that risk of groundwater flooding at the site is deemed to be 'low' overall, however, it is recommended that further investigation is carried out into the likelihood of groundwater flooding, particularly where basement development is proposed".
4. It also concurs with the recommendations regarding groundwater flooding contained in the Drainage and Flood Risk Report. The highest risk of flooding to the site now and into the future is fluvial and tidal mechanisms.

#### **Parish and Town Councils**

There were no comments.

#### **Other Organisations**

The **Shoreham District Ornithological Society** states that the higher level of discharges from new residences and facilities raises significant concerns about pollution in the river, particularly if treatment capacity is exceeded or fails. The likely higher flows from outfalls into the river Adur could impact riverside foraging habitat and the mudbank profile. The society recommends that consideration be given to avoid detrimental effects on sensitive areas, for example to the low-lying river cliff habitat where Common Sandpipers are regularly recorded and to the riverbanks and mudflats further downstream that are of high ornithological value.

**The Aquifer Partnership** commented that they would like to ensure that plans address groundwater pollution prevention, and would like to see that this development proposes no additional risk to the aquifer in terms of water quality, and no extra flood risk from hard surfaces or buildings. Good quality Sustainable Drainage (SuDS or Rainscapes) should be included in the site specification and followed through the design and construction process, including provision for ongoing maintenance. It notes the proposal of attenuation and soakaways. It would prefer the use of landscape led SuDS. Early consideration of the whole life of the drainage system, including design, construction, operation, management and maintenance of the drainage system is required. A full consideration and justification for the suggestion of locating 'highly vulnerable' development in the Riverside location is required.

#### **Individuals**

One individual/member of the public made a general comment on water supply and wastewater disposal not being up to standard and any further increase in housing and population in the area would put an impossible strain on the infrastructure, plus issues regarding Climate Change.