

Adur & Worthing Councils - Development
Control
Richmond Road, Worthing, BN11 1LF

Reference: PA-0010035/01
Customer reference: AWDm/0628/26
18 August 2026

Full planning application for a mixed-use development comprising 123 dwellings and commercial floorspace together with associated parking, landscaping, open space and drainage [Land at Durrington Gasworks].

Land between Sword Street and Martlets Way Worthing West Sussex.

Dear Planning Officer,

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 **no objection** to the proposal **provided that the following conditions be attached to any planning permission granted**, and that the details in relation to these conditions be submitted and approved by the Local Planning Authority.

Condition 1 – Remediation strategy

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

- 1. A preliminary risk assessment which has identified:**
 - **all previous uses;**
 - **potential contaminants associated with those uses;**
 - **a conceptual model of the site indicating sources, pathways and receptors; and**

- **potentially unacceptable risks arising from contamination at the site.**
- 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.**
 - 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.**
 - 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.**

Any changes to these components require the written consent of the local planning authority.

The scheme shall be implemented as approved.

Reasons for condition 1

The submitted information demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

The proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with P2: Ground conditions, 3 of the National Planning Policy Framework.

Without this condition we would object to the proposal in line with P1: Planning for clean and safe places, 1, iii of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 2 – Verification report

Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reasons for condition 2

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with P1: Planning for clean and safe places, 1, iii of the National Planning Policy Framework.

Condition 3 – Previously unidentified contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reasons for condition 3

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with P1: Planning for clean and safe places, 1, iii of the National Planning Policy Framework.

Condition 4 – Deep foundations including piling

Deep foundations, including piling, using penetrative methods shall not be carried out other than with the written consent of the local planning authority.

The development shall be carried out in accordance with the approved details.

Reasons for condition 4

To ensure that the proposed deep foundations do not harm groundwater resources in line with P1: Planning for clean and safe places, 1, iii of the National Planning Policy Framework.

Condition 5 – Surface water scheme

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

The scheme shall be implemented as approved.

Reasons for condition 5

To ensure that any final drainage scheme does not pose a risk to groundwater or any other controlled water receptors, from mobilising contamination at this site.

Further comments for the Applicant and Local Planning Authority

We reviewed the submitted desk study. Whilst largely satisfactory in terms of assessing the risks, there are some areas where more work will be required as part of future works to determine/manage the risks to controlled waters (surface and/or groundwater).

The key areas where more work will be required to fully assess risks:

- **Limits on the groundwater conceptual model**, including limited assessment of groundwater flow direction, hydraulic gradients, migration pathways.
- **Limited assessment of contaminant fate and transport**, particularly for gasworks contaminants such as PAHs, phenols, cyanides and hydrocarbons, and their potential to impact groundwater and migrate.
- **Contamination beneath infilled gas tank** – what levels of contamination are beneath the infilled gas tanks? What proposals are there to assess this?
- **No groundwater quality data presented**, the report references previous groundwater monitoring installations and the site's history of potentially contaminating activities, but no groundwater quality data is currently submitted.

- **PFAS has been identified as a potential contaminant of concern**, but limited details are provided for any PFAS sampling, assessment or justification for screening it in/out. It would be our view that some targeted PFAS sampling should be undertaken, but we would not expect general site wide tested.
- **Limited justification for the conclusion that contamination is localised**, particularly with respect to potential groundwater impacts beneath the former gasworks and sewage treatment areas.
- **Groundwater monitoring recommendations are not clearly linked to identified pollutant linkages or risk to controlled waters**, making it difficult to determine whether the proposed work is sufficient to characterise risks to the Principal Aquifer.

We would appreciate further information being submitted in relation to the above points in due course.

If you have any questions regarding our response, please contact planningssd@environment-agency.gov.uk.

Yours sincerely,

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