

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

Our ref: HA/2024/125722/05-L01
Your ref: AL/11/24/OUT
Date: 04 April 2025

Dear Sir/Madam

FURTHER MODELLING INFORMATION SUBMITTED - HYBRID APPLICATION CONSISTING OF: 1) OUTLINE PERMISSION FOR ALL MATTERS RESERVED (EXCEPT ACCESS) FOR UP TO 400 NO DWELLINGS AND ASSOCIATED WORKS AND 2) FULL PLANNING PERMISSION FOR ALTERATIONS TO SITE ACCESS OFF WESTERGATE STREET AND THROUGH PINE CLOSE AND EAST-WEST LINK ROAD INCLUDING A BRIDGE OVER THE LIDSEY RIFE. THIS APPLICATION ALSO LIES WITHIN THE PARISH OF BARNHAM, FALLS WITHIN STRATEGIC SITE SD5, CIL ZONE 1 (ZERO RATED), AFFECTS THE SETTING OF LISTED BUILDINGS, AFFECTS THE CHARACTER AND APPEARANCE OF THE EASTERGATE CHURCH LANE CONSERVATION AREA, AFFECTS PUBLIC RIGHTS OF WAY. THIS APPLICATION IS THE SUBJECT OF AN ENVIRONMENTAL STATEMENT LAND EAST OF WESTERGATE WESTERGATE

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

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

Environment Agency position

We are supportive of ensuring that all properties are outside of the design flood extent, and of the decision to raise all properties by 0.15cm. We are also supportive of placing attenuation basins outside of the design flood extent. This should be confirmed to the Environment Agency in writing at full application stage.

We would agree that as mentioned, an 8m access to be provided alongside the Lidsey Rife would be welcomed. We would also note that it is likely that any outfalls into the Lidsey Rife, as well as the crossing, would require a Flood Risk Activity Permit, the

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: [REDACTED]
www.gov.uk/environment-agency
Cont/d..

details of which are included below within this response.

We are pleased to confirm the model has been reviewed and is now considered suitable for use in this study but may need further review if there are design changes.

A sensitivity test has been undertaken for baseflow on Westergate Stream with results presented in the supplied March 2025 Addendum report. It is noted that there may be future design changes to the proposed bridge on Westergate Stream. If further modelling is being undertaken to assess this, it is recommended that baseflow/an initial water level is included on Westergate Stream to better understand potential impacts in this area.

However, we **maintain our objection** to this application as there outstanding concerns not addressed in the Flood Risk Assessment. Therefore in the absence of an acceptable flood risk assessment (FRA) we object and request further information.

Reason

The current submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change planning practice guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess the flood risks posed by the development.

In particular, the FRA fails to provide details of the required floodplain compensation.

‘Addendum 2 to the Hydraulic modelling report – February 2025’ states, *“Although the modelling does demonstrate very small increases in flood levels as a result of the proposed crossing over the Lidsey Rife, we would like to propose that the same compensation storage is provided, in accordance with your agreed volumes with the adjacent proposed development. Our development and the adjacent proposed development share the proposed crossing over the Lidsey Rife and we will work together to ensure that level to level compensation storage is provided in areas outside the 100 year plus climate change envelope.”* No details of the proposed floodplain compensation has been provided.

Our response on 11th March 2024 stated *“Notwithstanding the above we will need to see either a clear indication of what floodplain compensation is required as part of the development or evidence that this is not required through a submitted model”*

The signed off model shows that there is a need for floodplain compensation.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above, includes a detailed plan to deliver the appropriate level of floodplain compensation.

Advice to Applicant

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)

- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission
-

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on [REDACTED]

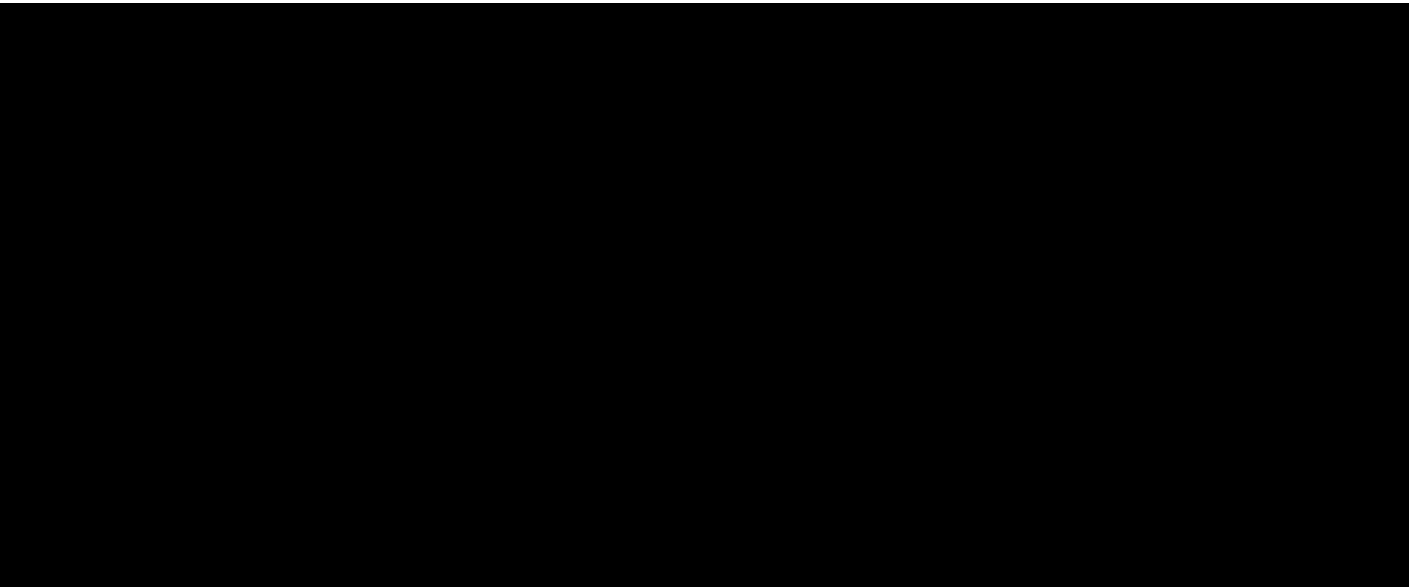
The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

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

[REDACTED]
[REDACTED]



Arun District Council, Civic Centre, Maltravers Rd Littlehampton, West Sussex, BN17 5LF www.arun.gov.uk

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-----Original Message-----

From: 
Sent: 04 April 2025 18:06
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Environment Agency Response to: AL/11/24/OUT

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The proposal has been reviewed and I enclose the Environment Agency's comments on:
Land East of Westergate Westergate

LPA ref: AL/11/24/OUT

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