

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

**Our ref:** HA/2025/127095/02-L01  
**Your ref:** BE/112/25/OUT  
**Date:** 01 December 2025

Dear Planning Officer,

**OUTLINE APPLICATION WITH SOME MATTERS RESERVED (EXCEPT  
ACCESS, LAYOUT AND SCALE) FOR 3 NO CLASS E LIGHT INDUSTRIAL  
UNITS AND ASSOCIATED LANDSCAPING. LAND AT HEATH PLACE BERSTED  
PO22 9SL**

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 **object** to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and planning practice guidance (PPG). We recommend that planning permission is refused on this basis.

**Reasons**

NPPF Annex 3 classifies development types according to their vulnerability to flood risk. PPG Table 2 provides guidance on which developments are incompatible with certain Flood Zones. This site lies partially within Flood Zone 3b functional floodplain, which is land defined by PPG as having a high probability of flooding.

The proposed development is classed as less vulnerable in accordance with Annex 3 of the NPPF. Table 2 of PPG makes it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

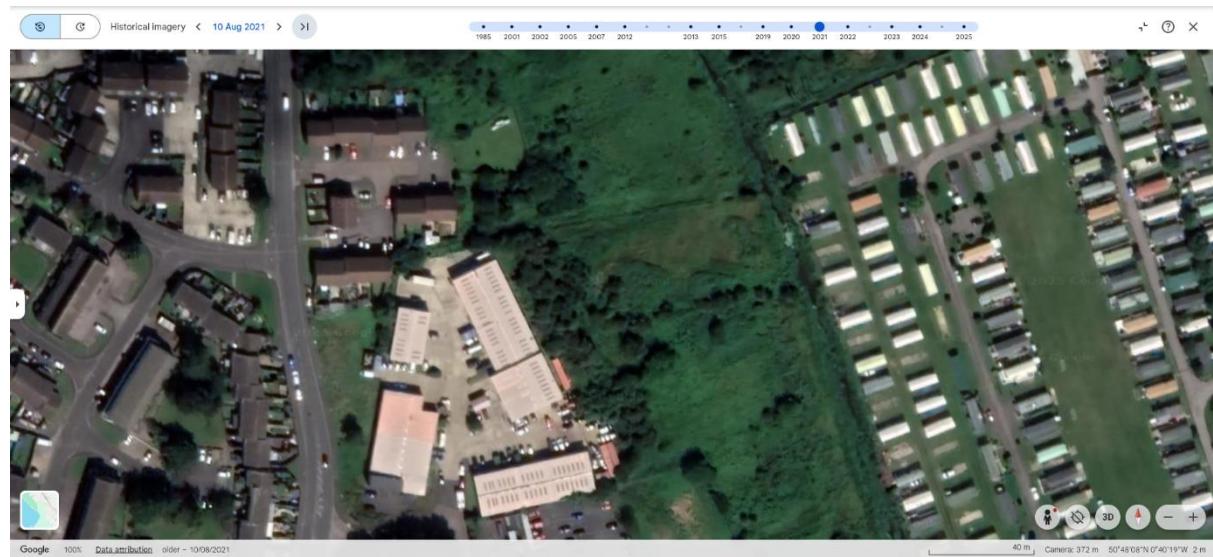
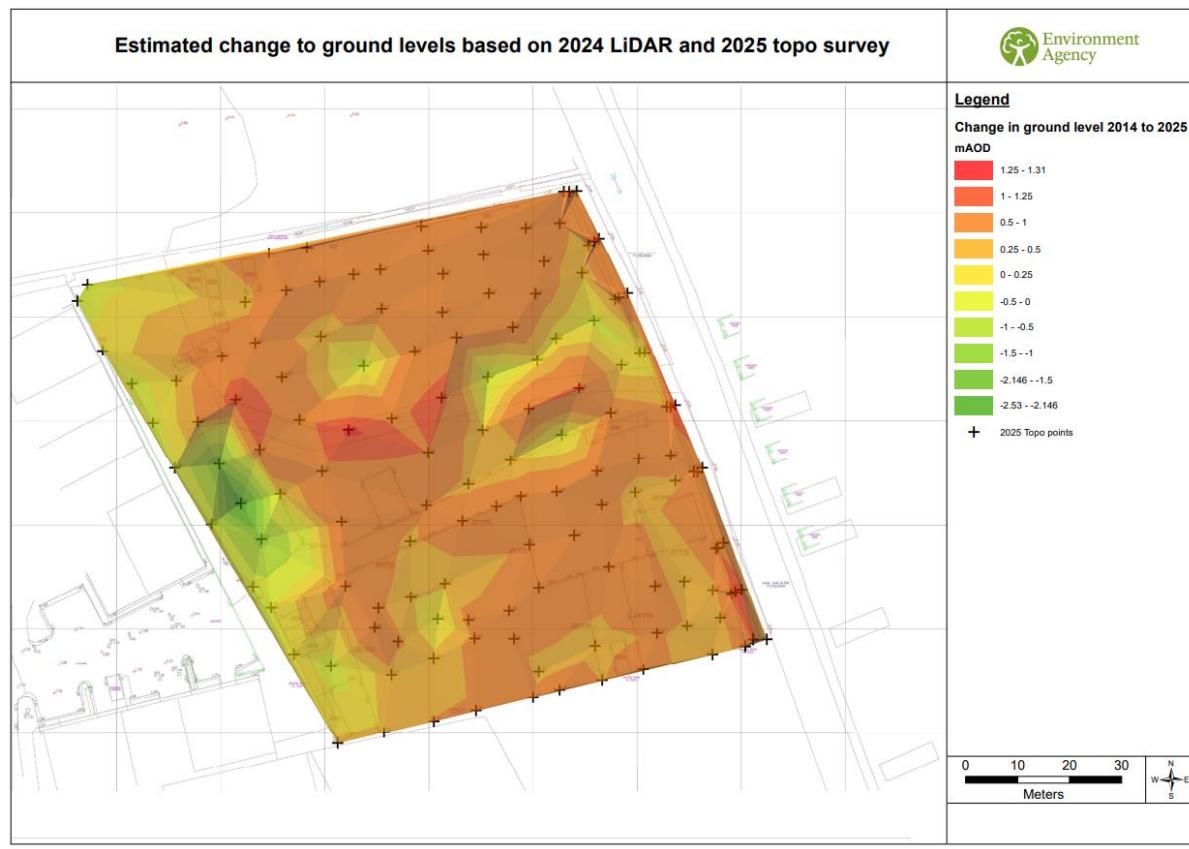
When comparing the topographic survey provided by the applicant (Drawing ref Oak\_24-147) with 2014 LiDAR data, it appears much of the site has been raised by 0.5-1m. As mentioned above, part of this site is identified as functional floodplain. These areas have been raised by 0.5-1.25m. This has likely removed floodplain storage and would displace water during a flood event resulting in increased flood risk elsewhere. This is further evidenced by the fact that the 2015 5% flood model levels are lower than the current ground levels. The new ground levels are above the 5% flood level as they were raised after the model was built. The land raising on site appears to also include an unpermitted flood bund running adjacent to the Aldingbourne Rife. A notice was served requiring the removal of the imported materials, as this activity was not permitted. See map and photos below. The Notice was not complied with, and the Environment Agency successfully prosecuted the responsible party. Despite this, the topographic survey provided shows the ground levels are still significantly higher than the original 2014 ground levels.

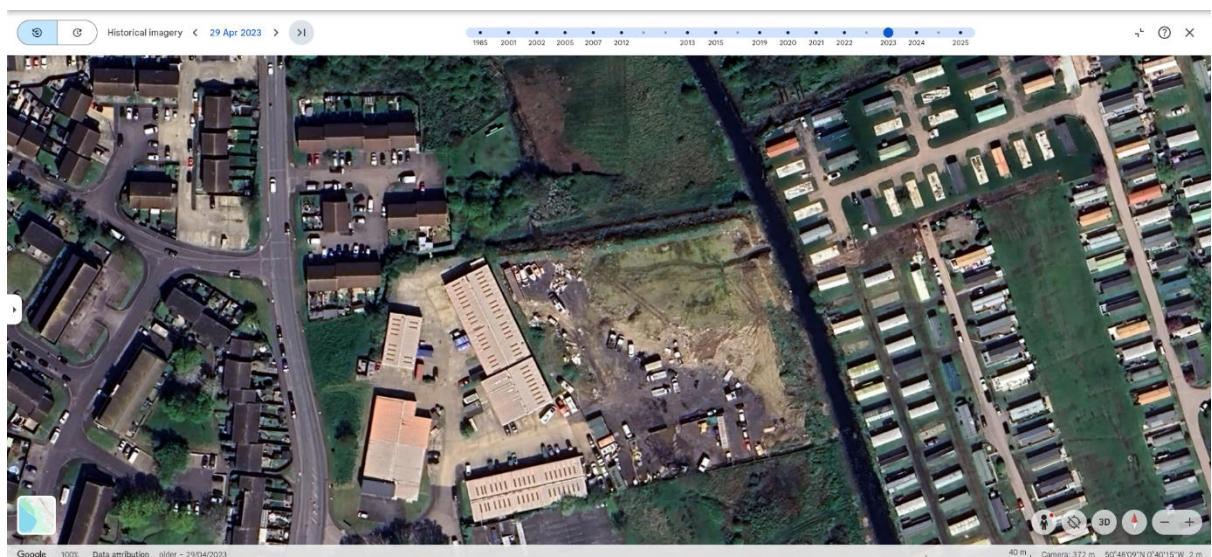
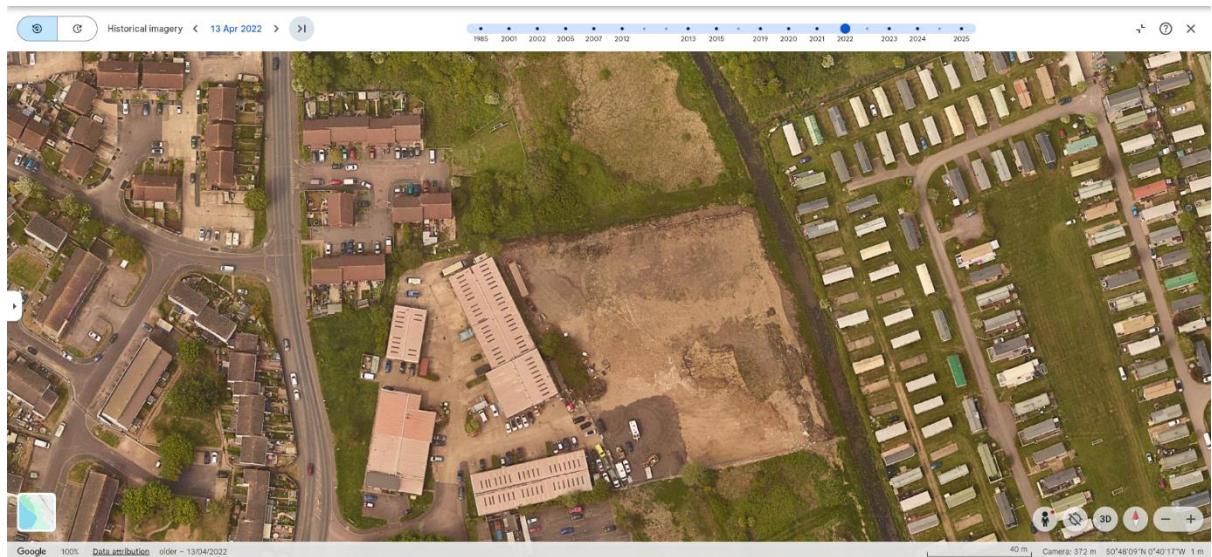
We can see that the compensation volume has been calculated for the piers and columns for the 3 buildings. The volume has been quoted as 0.5825m<sup>3</sup>, partly due to the shallow depths expected beneath the buildings. The flood modelling that produced those depths used the 2014, pre land raising, ground levels. As such, while the ground levels are raised above the 2014 levels, the locally available flood modelling is not suitable for use.

### **Overcoming our objection**

To overcome our objection, the applicant should restore the site ground levels to the original levels or provide adequate level for level floodplain compensation up to the design flood event including climate change to offset the loss of storage through land raising. Level for level compensation should be located as near as possible to where the loss of flood storage has occurred, to ensure the floodplain remains hydraulically linked. The development site and surrounding areas are largely within Flood Zones 2 and 3. As a result, we do not believe that the requisite floodplain compensation could be provided for the development proposed.

Furthermore, once the above has been rectified, the applicant should recalculate the required floodplain compensation and provide details of how this will be provided.





Drone photo captured 7<sup>th</sup> November 2023 showing unpermitted flood bund (Provided by WSCC)

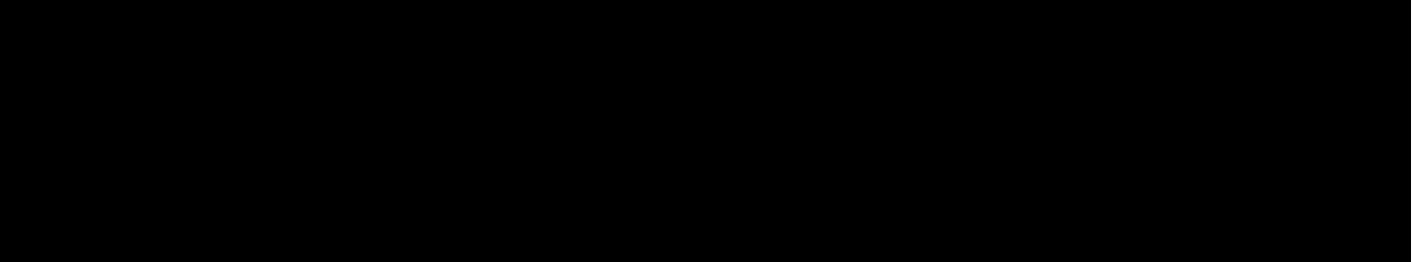


Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

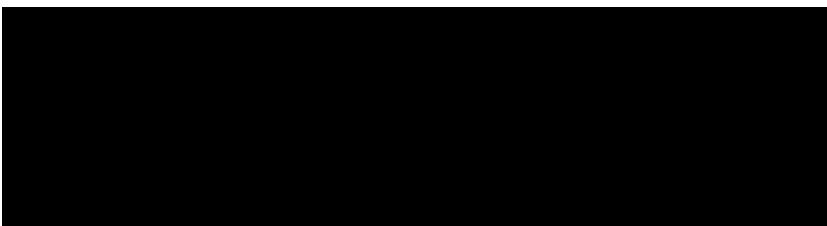
Yours faithfully

**Mrs Sophie Brown**  
**Sustainable Places Planning Advisor**

[REDACTED]  
[REDACTED]



PL- consultation- Environment Agency response



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Littlehampton, West Sussex, BN17 5LF

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### Our priorities...



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**From:** Simon Davis <Simon.Davis@arun.gov.uk>

**Sent:** 02 December 2025 17:17

**To:** Planning.Responses <Planning.Responses@arun.gov.uk>

**Subject:** FW: BE/112/25/OUT - EA Response

Please add this Consult Response

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**From:** Sophie Brown [REDACTED]

**Sent:** 01 December 2025 16:51

**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>

**Subject:** BE/112/25/OUT - EA Response

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Hi Simon,

As discussed please see attached our response. Because my response includes images I have had to pdf and send through email as oppose to through the usual route. Please accept my apologies for any inconvenience.

Kind regards

Sophie

**Sophie Brown**

Planning Specialist, Sustainable Places Solent and South Downs  
**Environment Agency** | Oving Road, Chichester, West Sussex, PO20 2AG

[REDACTED]  
[REDACTED]  
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**Creating a better place  
for people and wildlife**



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