

RE: BE/15/26/PL - Land East of Heath Place, Bersted, West Sussex, PO22 9SL: Environment Agency Position

Dear Sir / Madam

We are writing in response to the initial EA comments on planning reference BE/15/26/PL, dated 02 April 2026.

The EA comments state:

The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- *take the impacts of climate change into account:*
 - *Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 0.1% AEP fluvial flood event. Consequently, the development proposes inadequate flood storage compensation.*

The use of under croft car parking at ground floor level has been proposed at other sites within the Aldingbourne Rife catchment area. Our local position is that, while in some cases they allow water to flow freely and will therefore not be classed as voids, they do not remove the need for floodplain compensation entirely. Therefore, loss of floodplain area to accommodate large supporting pillars/posts for these structures, should still be adequately compensated.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

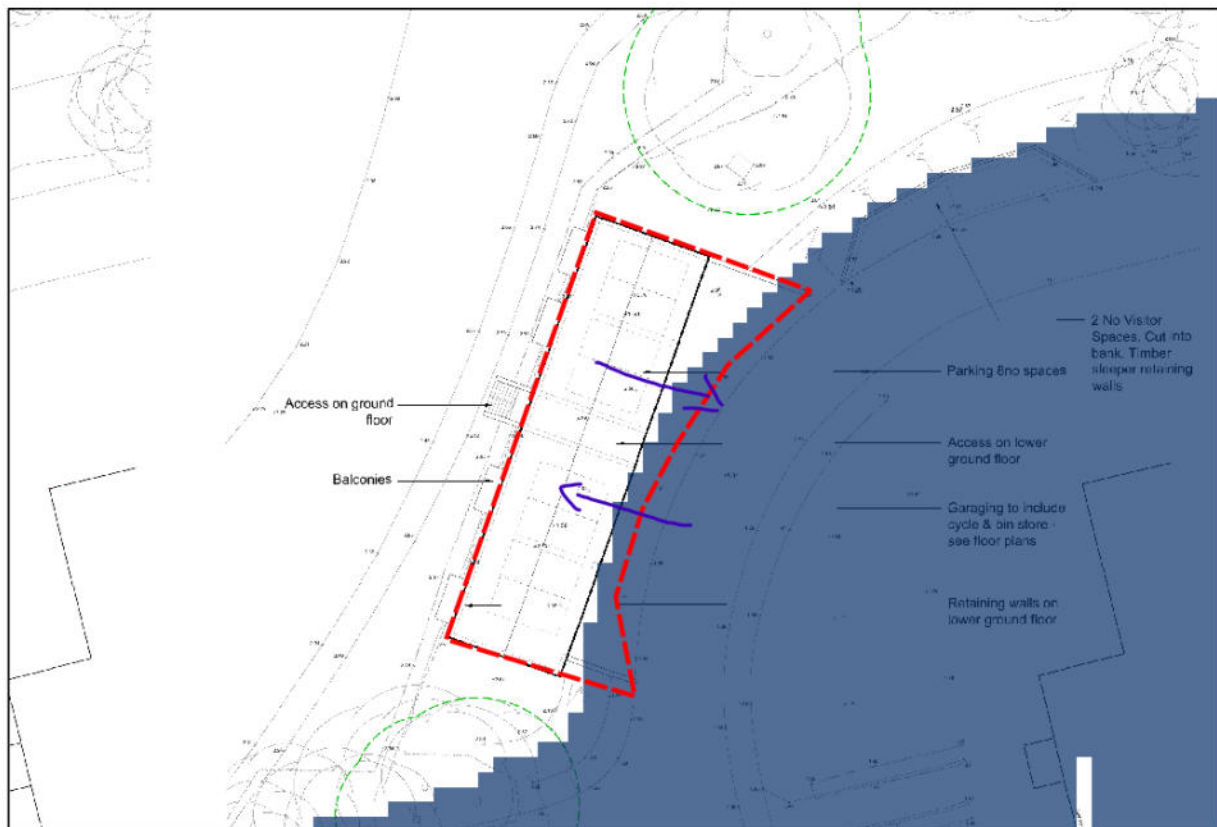
Our response to these comments is provided below:

As identified in the FRA, the flood level for the 1000 year fluvial (and fluvial combined) is 2.03m AOD. The residential uses are at 4.20m AOD, which is 2.17m above this level. Therefore, the development is

resilient to the 1000 year event and occupants will be safe from flooding for the lifetime of the development.

It is acknowledged that undercroft car parking does not remove the requirement for compensation entirely. However, in this instance some important factors are being overlooked in the EA's response:

- The site is located on the edge of the floodplain and therefore there is no overland flow or flow pathway through the building. Water will rise on Heath Place and enter the site through the open front then recede the same way, as indicated by the purple arrows on the image below.



- The front of the building is largely open apart from two supporting pillars (totalling 0.45m²) and the stairwell.
- The car parking area is to be lowered to have a FFL similar to that of Heath Place (1.40m AOD) to allow car access. Currently, the land levels in this area are circa. 2.50m AOD.
- Therefore, as highlighted within the FRA already, levels are being lowered from outside the floodplain into the 1000 year floodplain – **which will increase floodplain capacity.**

- The car parking areas either side of the stairwell total 108m² and 90m². Lowering these two areas to 1.40m AOD will provide an additional 66.96m³ and 55.80m³ floodplain storage, respectively. (108x0.62=66.96. 90x0.62=55.80)
- The stairwell totals 23m² and the two supporting pillars in the front total 0.45m². Accounting for these within the floodplain calcs means 14.26m³ and 0.279m³ of flood water would be displaced.
- Overall, there will be an increase in floodplain capacity of approximately 108.221m³ during the 1000 year flood event.
- Given the significant increase in floodplain capacity, there is no additional requirement to provide additional compensatory flood storage on site.

We trust this information is sufficient to address the comments. If you need any further information, please don't hesitate to contact.

Kind Regards,

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