

Arun District Council - Development
Control

Reference: PA-0000287/01
Customer reference: BE/15/26/PL
02 April 2026

Erection of a 3-storey building comprising of under-croft car parking and bicycle store, 2 floors of 4 No self-contained flats on each (8 No flats in total) with pedestrian access formed onto Ash Grove. This application is in CIL Zone 4 (Zero Rated) as flats.

Land East of Heath Place, Bersted, PO22 9SL.

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation BE/15/26/PL.

Environment Agency position

In the absence of an adequate flood risk assessment (FRA) **we object** to this application and recommend that planning permission is refused.

Reason(s)

The 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 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.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice to Local Planning Authority (LPA)

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in National Planning Policy Framework (NPPF) footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal. If your LPA is not subject to the 'presumption in favour of sustainable development' you can disregard this paragraph. If our objection on flood risk grounds [delete as is subsequently withdrawn, you can also disregard this paragraph.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with Paragraph 019 of the 'Determining a planning application' Guidance (Ref. ID: 21b-019-20190315), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

If you have any questions regarding our response, please contact

[REDACTED]

Yours sincerely,

Victoria Hindmarsh,

[REDACTED]

creating a better place
for people and wildlife



[REDACTED]

From: Elaine Walby on behalf of Planning.Responses
Sent: 02 April 2026 12:21
To: Planning Scanning
Subject: FW: BE/15/26/PL - EA response
Attachments: Response 01-04-2026.pdf

PL- Consultation- Environment Agency response

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

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

To register to receive notification of planning applications in your area please go to <https://www1.arun.gov.uk/planning-application-finder>

Our priorities...



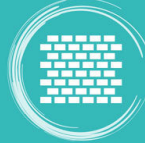
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: PlanningSSD [REDACTED]
Sent: 02 April 2026 07:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: BE/15/26/PL - EA response

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.



Erection of a 3-storey building comprising of under-croft car parking and bicycle store, 2 floors of 4 No self-contained flats on each (8 No flats in total) with pedestrian access formed onto Ash Grove. This application is in CIL Zone 4 (Zero Rated) as flats
Bersted PO22 9SL

Dear Planning Officer,

Find attached a Planning Application response to your consultation 'BE/15/26/PL'.

We have outlined any objections, conditions or informatives that are necessary for your application. if you have any questions regarding our response, please contact [REDACTED]

Yours sincerely,
Victoria Hindmarsh

[REDACTED]

Teville Gate House, 25 Railway Approach, Worthing, West Sussex BN11 1UR

This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.