

Mr Neil Crowther
Arun District Council
Development Control
1, Arun Civic Centre Maltravers Road
Littlehampton, West Sussex
BN17 5LF

Our ref: HA/2010/108965/02-L01

Your ref: BN/27/09/

Date: 10 February 2010

Dear Mr Crowther,

OUTLINE APPLICATION FOR DEMOLITION OF ALL EXISTING BUILDINGS/STRUCTURES & REDEVELOPMENT WITH UP TO 100 DWELLINGS (INCLUDING UP TO 40 AFFORDABLE HOMES) TOGETHER WITH ASSOCIATED OPEN SPACE, LANDSCAPING & ACCESS IMPROVEMENTS

Thank you for your consultation request regarding the application above.

Environment Agency position

The submitted Flood Risk Assessment (FRA) is not considered to be sufficient in this instance and we therefore **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason

The FRA submitted with this application does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development

In particular:

- The FRA identified the risk of groundwater flooding to the site and a 'probability for the groundwater to emerge to the surface', but this risk is not quantified and therefore it cannot be assessed whether the recommended mitigation is sufficient.
- The applicant proposes to connect to the public sewer. We are not aware of any surface water sewers in the area. It is also unclear whether Southern Water would accept flow from a SuDS system. This would need to be discussed with them. However it seems likely alternative methods of surface water disposal will need to be found.
- The OS map does show a ditch on site. It is unclear whether this ditch exists and whether it is part of a wider ditch network. This should be investigated as it would provide an option for surface water disposal.

We would point out that under Approved Document H of the Building Regulations, the surface water disposal hierarchy should be followed, in that disposal to surface water sewer should be the last option if infiltration and outfall to a watercourse are not practical.

- The FRA states that surface water will be disposed via a SuDS system. Oversized pipes are not a SuDS system. In addition, it is not clear who would take over the maintenance of these as they would not be designed in line with 'sewers for adoption'. Section 6B of the FRA states the SuDS and sewer network would be maintained by the owners, but it is not clear who the owners are and what arrangements would be made to ensure long term maintenance. SuDs are required

This objection is not an objection 'in principle' to the site being developed, but one 'unless/until' such information is received to show that the surface water issues can be adequately resolved. I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely,

Miss Kate Attrill
Senior Area Planning Officer

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