

Amber Willard
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

19th June 2026
Our Ref: D2380
Planning Ref: BN/64/26/PL

Dear Amber,

RE: HILL VIEW, EASTERGATE LANE, EASTERGATE PO20 3SJ

We write in response to Barnham & Eastergate Parish Council's response (15th June) in relation to the above planning application. BP Civils is responding on the applicant's behalf, as their appointed civil engineering consultant, assisting in flood risk and drainage matters in respect of this application.

BP Civils has prepared a drainage strategy (D2380/DS2.0) which incorporates sections on flood risk. It would appear that the parish council may not have referred to this report as the drainage strategy report covers most, if not all, of the points raised.

The parish council states *'that enhancement of the wastewater facilities should be completed prior to consideration of supporting this application.'* It is assumed that the parish council is making reference to Southern Water's network in relation to this point. This is not how the process works, or can work. Southern Water will monitor planning applications and proposed works and will programme improvements based on approved development to ensure that upgrades, where necessary, are targeted to areas that specifically require it.

In order to connect to Southern Water's network, applicants/developers are obliged to make financial contributions under S106 of the Water Industry Act 1991. These financial contributions, in part, fund necessary network improvements and upgrades.

The site is situated within the Lidsey Wastewater Treatment Catchment Area. The drainage strategy details the issues associated with this locally, and specifically how the proposed development will provide betterment, if assumptions are proven to be correct. This is detailed within Section 9 of the drainage strategy report.

Southern Water is currently undertaking its largest ever investment programme for the period spanning 2025-2030 (Asset Management Period 8 - AMP8). AMP8 is the eighth five-year regulatory cycle governing the water and wastewater industry in England and Wales.

The applicant is not responsible, or in a position of any authority, to enforce or implement infrastructure improvements on behalf of third-party statutory undertakers. The applicant, therefore, should not be penalised in respect of this planning application on the basis of the parish council's opinion that improvements should be completed prior to consideration of supporting this application. For the reasons outlined above, the existing framework does not allow for this.

The parish council also states that no development should take place in areas at risk of flooding. The drainage strategy provides commentary on flood risk (Section 5) and confirms that the site is located in Flood Zone 1. Commentary is provided in respect of surface water flood risk and specifically a localised low point of the site. The risk of flooding is assessed as being 'Very Low' from all of the sources of potential flood risk considered, with clarification and context provided in respect of the localised low point of the site and surface water flood risk.

The exception test is not applicable in relation to the proposed development as "More Vulnerable" development (as defined in PPG Flood Risk and Coastal Change) is acceptable in Flood Zone 1. Please refer to Section 6 of the drainage strategy report.

The parish council makes reference to requirements when proposing surface water discharge off-site. The proposed drainage strategy relies on infiltration, therefore surface water will be managed fully within the confines of the site. The surface water drainage strategy has been developed in accordance with the National Standards for SuDS (June 2025) and current design standards.

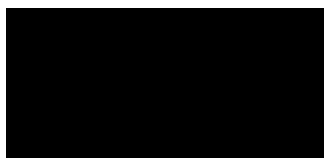
In respect of flood risk and drainage matters, the parish council closes in stating '*all development proposals must demonstrate that sewage infrastructure cannot release into or be infiltrated by, surface water.*'

Foul and surface water drainage will be dealt with by separate, dedicated systems in relation to the proposed development. Foul water will drain to Southern Water's public foul water sewer, with surface water draining via infiltration methods and techniques in accordance with the relevant drainage hierarchies. No surface water is proposed to drain to any part of a foul drainage system.

We trust that these points of clarification will assist in addressing and alleviating the concerns of the parish council.

Should you wish to discuss any point in further detail, please do not hesitate to contact me.

Yours sincerely,



Stuart Burnett
Associate Director, BP Civils