

Mr N Crowther
Arun District Council
Planning Policy
1, Arun Civic Centre Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2010/109365/01-L01
Your ref: BN/6/10
Date: 01 April 2010

Dear Mr Crowther

**OUTLINE APPLICATION WITH SOME MATTERS RESERVED FOR 36 NO.
HOUSES. (THIS APPLICATION IS A DEPARTURE FROM THE DEVELOPMENT
PLAN)
THE LILLIES HOLIDAY PARK YAPTON ROAD BARNHAM PO22 0AY**

Thank you for consulting us on the above planning application. Please quote our reference number on any correspondence.

Environment Agency position

Having reviewed the information submitted we currently object to the proposal as submitted on water quality and flood risk grounds. Our reasons are set out in more detail below:

Reason 1: Flood Risk

The Flood Risk Assessment (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. This is further supported by Policy GEN9 of the Arun District Local Plan.

In particular, the submitted FRA fails to provide a satisfactory method of surface water disposal.

The Yapton and Barnham areas are known to suffer from very high groundwater levels. As a result soakaways do not normally function effectively. The FRA uses assumed soakage rates and there is no evidence that permeability testing has been carried out (which must be done during the wet winter months). No other method of surface water disposal has been identified in the FRA should permeability testing mean that soakaways are inappropriate at this location.

Reason 2: Water Quality

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
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The proposed development involves a connection to the main foul sewerage system which may pose an unacceptable risk of pollution to water quality.

Insufficient information has been submitted to demonstrate that there will be no increase in flows as a result of the development. We note that paragraph 4.2.11 of the submitted Flood Risk Assessment states that no increase in foul flows are anticipated. However, a comprehensive analysis of existing and proposed flows are required to demonstrate this and enable any potential impact to be assessed.

Our response is based on the precautionary principle as advocated in PPS23.

Government policy as set out in Planning Policy Statement 23 notes the key role that the planning system plays in determining the location of development which may give rise to pollution, either directly or indirectly, and in ensuring that other uses and developments are not, as far as possible, affected by major existing or potential sources of pollution. Furthermore Policy GEN9 of the Arun District Local Plan states that Planning permission for development which will materially increase foul discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development.

There are significant problems with the sewer network in Barnham. The existing sewer line between Barnham and Lidsey Waste Water Treatment Works cannot cope with the flows in it and this has resulted in untreated sewage entering the nearby watercourse in 2009 and in further incidents this year.

The Barnham Rife leads into the Lidsey Rife which is a failing waterbody as defined by the Water Framework Directive and detailed in the South East River Basin Management Plan. This piece of European legislation places an obligation on planning authorities and other co-deliverers to not allow any detriment to the quality of watercourses. We believe that the issues with capacity in the existing foul sewer network upstream of the sewage works are a contributory factor to the degraded status of the water body.

We understand Southern Water through Atkins are currently investigating the ongoing problems with the network, and would suggest they are also consulted on this application.

If you are minded to grant the application contrary to our objection we wish to be re-consulted on the application as conditions and further information will apply.

I trust that the above comments are satisfactory but if you require any further information please contact me.

Yours sincerely

Miss Catherine McLeod
Planning Liaison Officer

Direct dial 01903 703858

Direct e-mail planning.southdowns@environment-agency.gov.uk

cc Ivon Blumer Architects

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