

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

Our ref: HA/2021/123314/01-L01
Your ref: F/7/21/PL
Date: 05 July 2021

Dear Sir/Madam

BUILDING A NEW 1.28 HA HIGH-TECH GLASSHOUSE, RESERVOIR AND PARKING AREA ADJACENT TO THE EXISTING 6 HA GLASSHOUSE, RESERVOIR AND NURSERY AREA

WICKS FARM FORD LANE FORD BN18 0DF

Thank you for consulting the Environment Agency on the above application.

Environment Agency Position

In the absence of an acceptable 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 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular:

- There has been no consideration for flood plain compensation
- There is no indication of the capacity of the reservoir in the submitted Flood Risk Assessment (FRA). Our initial calculations suggest that this would be classed as a Large Raised Reservoir. Subsequently, we would require further details of how this proposal would be planned, designed and constructed in accordance with the Reservoir Act requirements. This includes appointing an All Reservoir Panel Engineer as a construction engineer to oversee and supervise building the reservoir
- A large raised Reservoir will require an understanding of what will be at risk if there is an uncontrolled discharge of water (especially with relation to the railway line and subsequent embankments), an on-site plan to manage a reservoir incident and ongoing maintenance and supervision
- The reservoir should be constructed in accordance with the Small embanked reservoirs CIRIA Guidance 161 (side slopes 1 in 3 and a crest width of 3 metres)

Environment Agency
Environment Agency Depot Canal Walk, Romsey, Hampshire, SO51 7LP.

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and there should also be details of the overflow arrangement

Current guidance can be found here: <https://www.gov.uk/guidance/reservoirs-owner-and-operator-requirements>

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 on any revised FRA submitted and we'll respond within 21 days of receiving it.

Advice to Local Planning Authority/Applicant

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), 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 are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency 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.

Charged advice service

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Should you have any further queries please do not hesitate to contact me.

Yours faithfully

Miss Hannah Brothwell
Sustainable Places Advisor

