

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

**Our ref:** HA/2022/124004/07-L01  
**Your ref:** M/16/22/PL  
**Date:** 07 March 2023

Dear Planning Team

**FURTHER MODELLING INFORMATION: RE-CONSULTATION - LAYING OUT OF AN 18 HOLE 72 PAR GOLF COURSE, A 9 HOLE GOLF COURSE, PRACTICE GREENS AND A DRIVING RANGE INCLUDING A BUGGY COMPOUND; THE FORMATION OF A NEW ACCESS ONTO THE A259; CONSTRUCTION OF A CLUB HOUSE WITH ASSOCIATED GOLF CLUB FACILITIES; THE CONSTRUCTION OF A MAINTENANCE BUILDING AND EXTERNAL AREA OF HARDSTANDING; THE LAYING OF PARKING, NEW ROADS AND PATHS; NEW LANDSCAPE PLANTING; SURFACE WATER DRAINAGE BASINS AND WATER STORAGE RESEVOIRS; AND OTHER EARTH WORKS AND INFRASTRUCTURE. THIS APPLICATION ALSO LIES WITHIN THE PARISHES OF CLIMPING AND YAPTON, IS A DEPARTURE FROM THE DEVELOPMENT PLAN AND AFFECTS A PUBLIC RIGHT OF WAY. THIS APPLICATION IS SUBJECT TO AN ENVIRONMENTAL STATEMENT. LAND SOUTH OF GREVATTS LANE/A259 CLIMPING.**

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

We have reviewed the information as submitted and set out our position below.

### **Environment Agency Position**

Following a review of the technical note dated 7<sup>th</sup> February 2023 we are now able to remove our objection. The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk if the following planning condition is included.

### **Condition 1 of 3**

The development shall be carried out in accordance with the submitted flood risk assessment (ref 70088068-FRA-RV1 December 2021) and the following mitigation measures it details:

Environment Agency  
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

- Post development ground levels must match those provided in drawing 'Grading Plan – 04.02.22' found in the supplied hydraulic model report ref 70088068-HMR1.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

### **Reasons**

To reduce the risk of flooding to the proposed development and future occupants

To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided

The Golf Course Layout and associated buildings proposed as part of this development could have an unacceptable effect on the ecological value of the rife, ditches and water dependent habitat at this site. Which provide valuable habitat and a secure wildlife corridor for a range of species. The ecological enhancements that have been proposed will require a Landscape & Environmental Management plan to be in place. This will ensure the landscape provides a maximum benefit to people and the environment.

### **Condition 2 of 3**

No development shall take place until a landscape and ecological management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas, has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- details of maintenance regimes
- details of any new habitat created on-site
- details of treatment of site boundaries and/or buffers around water bodies
- details of future management responsibilities

### **Reasons**

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy. Development that encroaches on watercourses can have a potentially severe impact on their ecological value.

The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect an 5 metre wide buffer zone around the watercourses on site.

### **Condition 3 of 3**

No development shall take place until a scheme for the provision and management of a 5 metre wide buffer zone alongside the watercourse has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme

shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme (for example, native species)
- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan
- details of any proposed footpaths, fencing, lighting, etc

### **Reasons**

Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

This approach is supported by paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

Whilst there are still outstanding surveys for protected species on site the presumption should be that watercourses have the potential to provide habitat for, and support populations of water vole.

We support the provision of Biodiversity Net Gain as proposed for the scheme.

### **Environmental Permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

### **Culverting Consent**

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the lead local flood authority which in this instance is West Sussex County Council. It is best to discuss proposals for any works with them at an early stage.

### **Flood Warnings**

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.

For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

**Mrs Sophie Brown**  
**Sustainable Places Planning Advisor**

