

***Mallards
Eastergate Lane
Walberton
BN18 0BA***

Mr Neil Crowther
Group Head of Planning
Arun District Council
By email: neil.crowther@arun.gov.uk

27th May 2021

Dear Mr Crowther

WA/32/21/PL

Please register this as an objection to the above planning application and upload this letter and WSCC Flood pages to the planning portal.

ADC yellow planning notices

Please note that several have been placed in West Walberton Lane but just one in Eastergate Lane outside a house nearly 100 yards from the proposed entrance on opposite side of road. There is no sign close to the site entrance or on the gate.

ADC description

Land at West Walberton Lane, BN18 0QF is misleading when access is from Eastergate Lane, BN18 0BA

Application form

6 Undeveloped land – occasional grazing. This field was continuously grazed from at least 1980s till 2019

11 Flood risk assessment The proposal WILL increase flood risk in Eastergate Lane, Walberton Green, Walberton Pond, Burch Grove and Barnham Lane

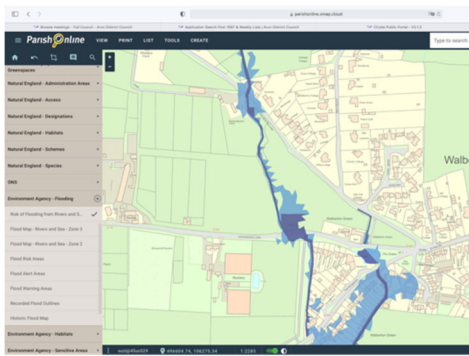
Planning Statement

We agree with the points made by Arun DC in all the pre-apps. The site is not suitable for development. Particularly Environment ENV DM5.

Landscape Details App 2-5

Drawing P20-2233_06

Walberton Parish Council would need to give permission to open access from the site on to The Green and to our knowledge has not been approached.



Flooding map

Note the houses at the eastern end of Eastergate Lane have all been subject to flooding (2000 and 2012) and are rated high risk. The gov web site link highlights the large number of properties in this area at high risk of flooding – about 50. Eastergate Lane, Walberton Green, Burch Grove, 1 to 26 Oaktree Cottages, Barnham Lane.

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/postcode>

The flood water from Kelsey and Pennycress flows into the back gardens of The Bungalows, Barnham Lane.

In addition, Roselands at Walberton Green and 1 Oaktree Cottages, Barnham Lane are also subject to frequent flooding. Photo outside Roselands - November 2019.

The Environment Agency and WSCC highways are both called out on numerous occasions.



The eastern area of the site within the conservation area is also prone to flooding which has been ignored in the application. This photo shows horses in this area. This puts both Mulberry Barn and Mallards at risk of flooding.

WSCC 14 May response contradicts their attached report (WSCC 2014 flood – pages 5-6 and 9) which shows the whole area south of the site at risk of flooding.

Their report includes this photo of the flooding on the site.

Pages 5 - 6 and 9 clearly demonstrate the flood risk in this area.

Development of this site will exacerbate the flood risk.



Access Eastergate Lane is a 40 mph limit at the proposed access point with limited visibility both west and east. The junction to the west is 5 way with frequent near miss accidents. This junction is also prone to flooding – photo 2012.

The access to the development is almost opposite the well-used Walberton to Barnham cycle path and would make crossing Eastergate Lane more dangerous.



Policies

Arun

C SP1 "Countryside" states that residential development in the countryside outside the BUAB will not be permitted unless in accordance with policies in the Plan which refer to a specific use or type of development. It is noted that none of these relate to the proposed development at the application site.

As this site lies outside the nearest BUAB, it is categorised as being within the countryside and the scheme would therefore conflict with Local Plan Policies SD SP2 and C SP1

Walberton Parish Neighbourhood Plan

The Plan is part of the Development Plan having passed referendum on 6th May 2021 and therefore is to be used when determining planning applications for Walberton

This application site was rejected by residents in 2016 and the AECOM report for the updated N Plan agreed with Arun's HELAA assessment that the site was undevelopable.

Arun allocated Walberton parish a figure of 60 dwellings for their updated Neighbourhood Plan. The Plan has exceeded this number and is proposing delivering a total of 65 homes. The 2017 Plan Proposals Map (page 52) showed 9 sites, of which 7 have already been or about to be completed. Walberton Parish therefore has a track record of delivering the requisite housing.

The application is contrary to these policies: -

VE4 Conservation Areas.

The Conservation areas at Walberton Village and Walberton Green are important both historically and visually, it is important that development that might affect views into and out of the villages and the setting of buildings are strictly controlled.

VE6: Protection of Watercourses

This development has watercourses in 3 sections. In addition, there is a ditch along the length of the Eastergate Lane section which should be kept clear for water to flow freely in to Walberton Pond. The pond has recently been adversely affected by overflow from the development at Sunny Corner. The Environment Agency and Arun DC were both involved.

VE7 Surface Water management

We consider this would be breached by any consent since the scheme does not aim to reduce the overall level of flood risk.

Groundwater Level Monitoring

The applicant did not conduct the required monitoring between October and March. Only 29th November to 11th March. They also mislead ADC by stating the site was to be for 21 not 30 homes.

In situ Infiltration Testing letter – 18 February 2021. This refers to Paul Cann's (ADC) emails and additional requirements. This photo shows that the SA1 and SA2 are not located in the locations shown on the plan.



GA5 Traffic Management Proposals that significantly increase the level of traffic within the villages will be resisted.

Transport assessment

Traffic counts in September 2020 will be an incorrect assessment of 'normal' flow due to the pandemic.

Trip generation for 30 dwellings – only 12 am peak period vehicle and 2 pedestrian departures/11 pm peak period vehicle and 2 pedestrian arrivals. How can these figures be correct when one can reasonably assume 2 cars per house, so 60 vehicles on the estate? There is virtually no local employment so everyone will have to commute.

Pages 29 and 30 – illegible nonsensical data – completely unacceptable. Page 46 – footways, ditches and barriers – we note that these are referred to in relation to an OUTLINE application – which this is not, so more detail is required.

There is minimal public transport in the immediate locality - infrequent buses which do not allow anyone to take the bus anywhere to work a normal day.

The applicant refers to a Post Office and the Flintcroft Surgery. The Post Office has been gone for more than 5 years, and the surgery for more than 2 years. These references are misleading.

Please note that Highways England state that the Fontwell roundabouts are already over capacity. There is no demonstration of nil impact in the assessments.

The A29 bypass proposal will exacerbate delays in exiting Eastergate Lane to Fontwell Avenue.

VE10 2020 Biodiversity Corridors

Schedule 5 map reference 3 shows this site with a biodiversity corridor leading south, which incorporates a chalk stream that is designated as a NERC priority habitat. This corridor and Gap is designated as a Green Infrastructure Corridor by Arun DC.

VE13 Distinctive Views and Vistas

See view 1 in evidence base. As the land slopes uphill, the dwellings will be highly visible from the conservation area and The Green.

HP1 2020 Bult Up Area Boundary

The site is outside the BUAB and therefore conflicts with not only Walberton N Plan but also Arun DC and SDNP policies.

Policy H SP3 - Rural housing and exception sites

This development does not fulfil these criteria, such as local housing need as this is already exceeded with the sites at Avisford Grange, Fontwell Meadows, and new sites in our NP.

We regret to note that at the time of writing, there is no response showing from either the Arun Conservation Officer or the Environment Agency.

We notice that a new applicants document was uploaded on the 26th May – does this mean that a fresh consultation period will start again from that date?

Thank you for taking our comments in to consideration when reviewing this application which we trust that you will refuse.

Yours sincerely

[Unsigned – sent by email](#)

Mr M Hughes and Mrs S Clark

Local Flood Risk Zone (LFRZ)	
Storyboard	Area Name
LFRZ_003	Walberton Village
Lead Partner	West Sussex CC
LFRZ Area (ha)	12.56

Originator
Will Rust (11/12/2013)
Checker
Matt McDonald (20/12/2013)
Reviewer
Neil Kirsopp (26/06/2014)

Part 1: Preliminary Investigation: Assessment of Predicted flood risk.

Flood Source	Predicted Risk
Pluvial flooding	High
Fluvial flood Risk	High
Ground water flood risk	Medium
Public Sewer Flooding	High

Pluvial Flood Receptors (1 in 30)	
No. Commercial	0
No. Residential	0
Total	0

Fluvial Flood Receptors (Zone 2)	
No. Commercial	1
No. Residential	50
Total	51

No. of Hydraulic sewer incidents (Category 4 SIRFs) in vicinity	44
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LFRZ Priority at Part 1	High
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Part 1: Conclusions
Area at risk from flooding from all main sources.

Mapping Key

Areas susceptible to Groundwater flooding
Indicates the likelihood of flooding from a Groundwater source. Measured as a percentage proportion of a 1km square that is susceptible to groundwater flood (emergence). Data from the Environment Agency.

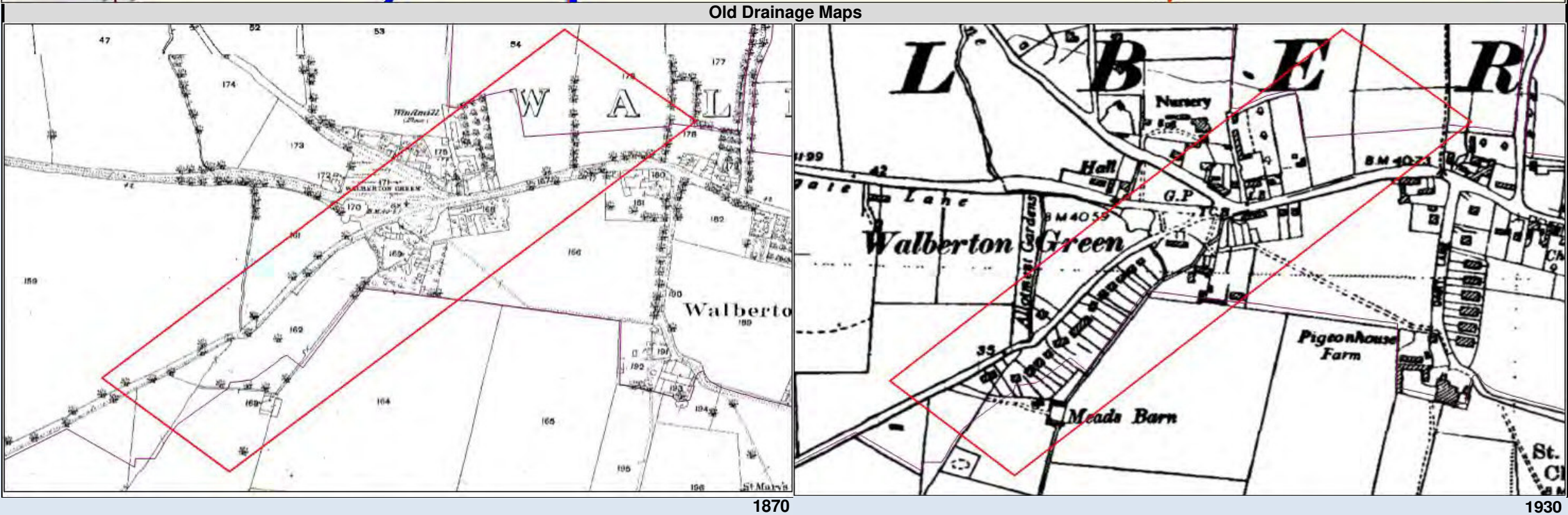
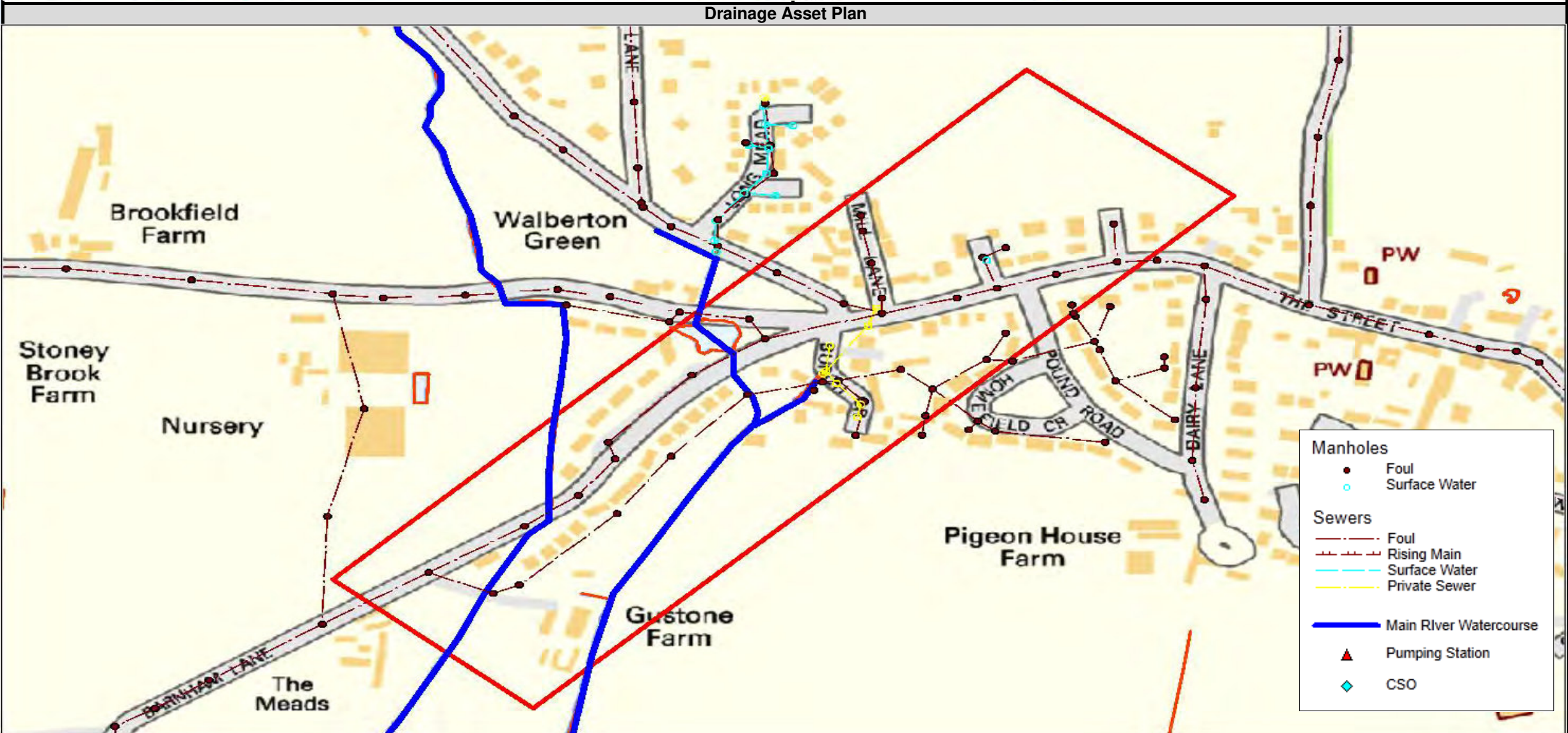
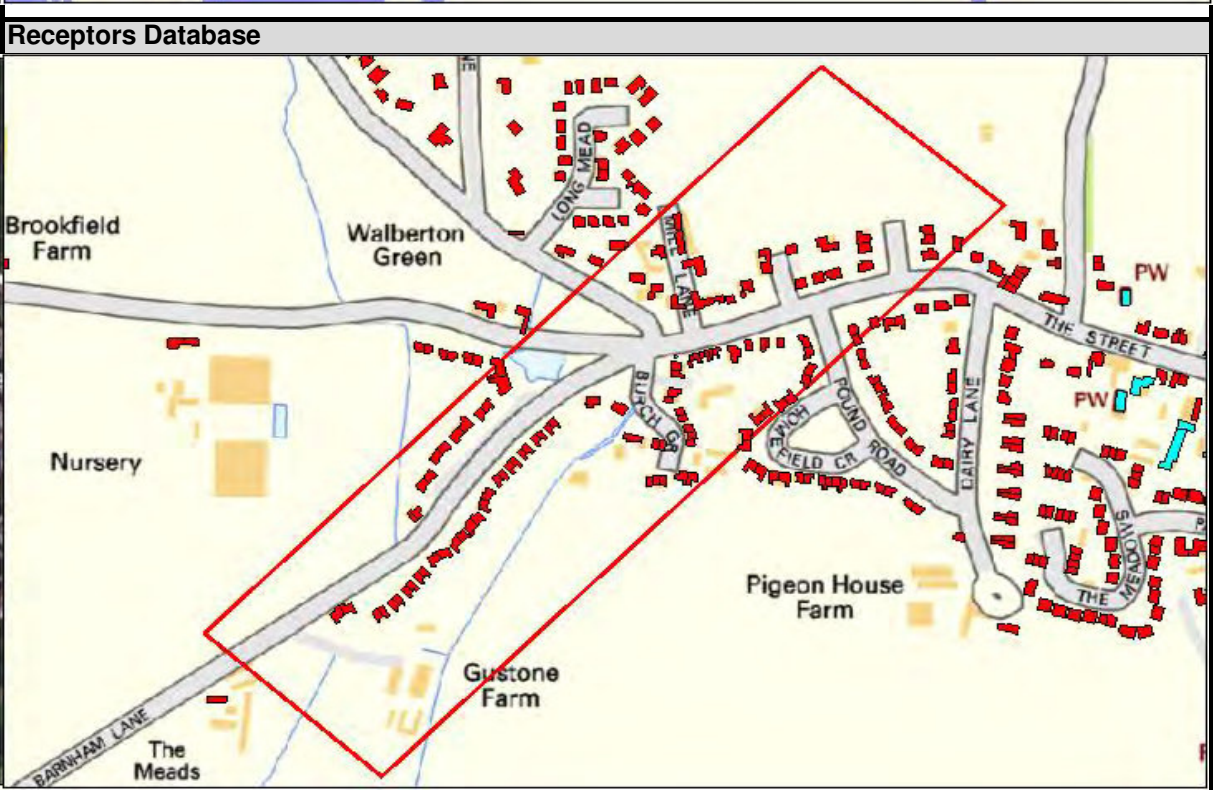
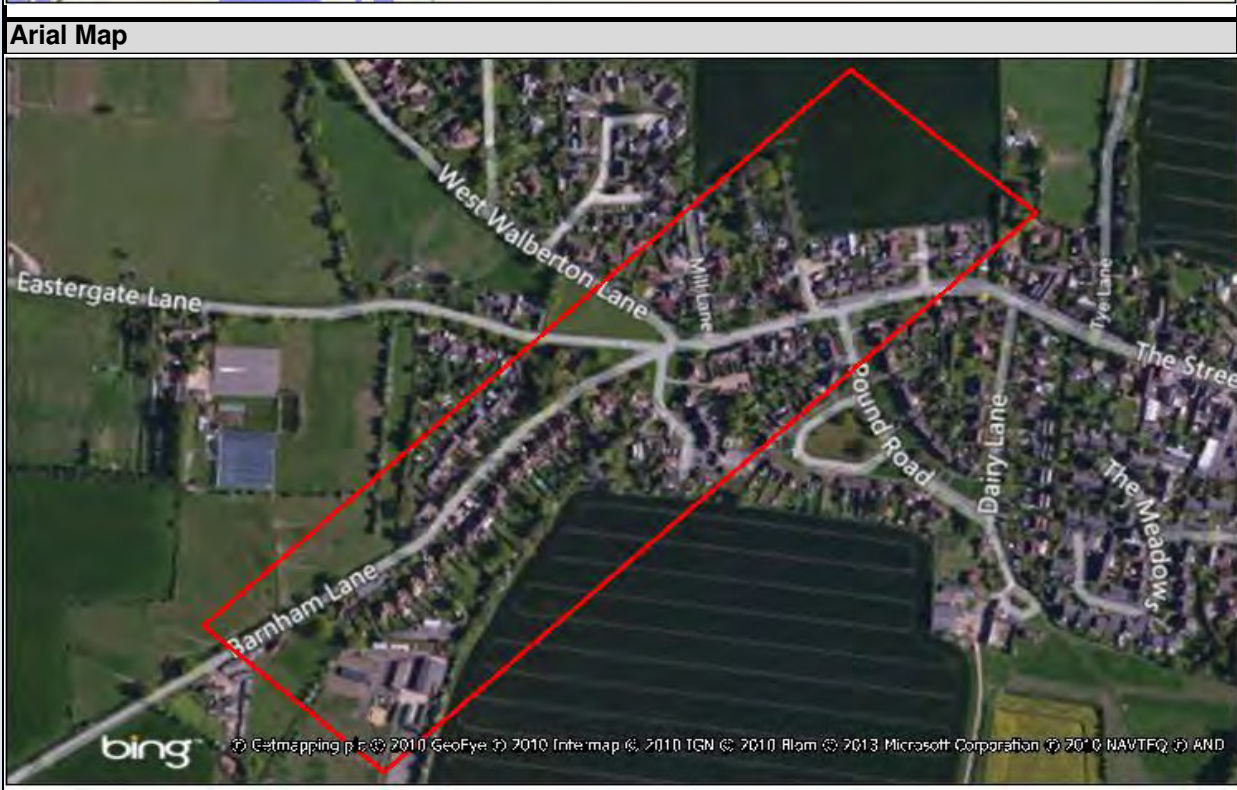
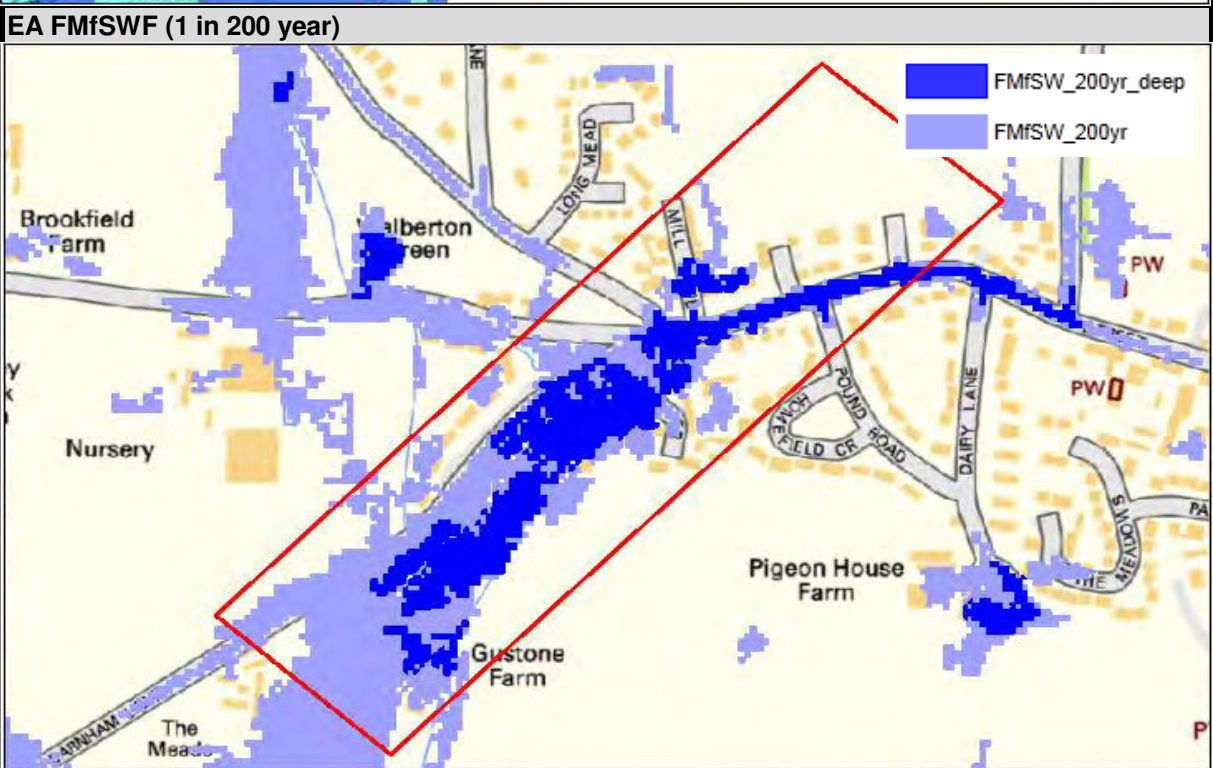
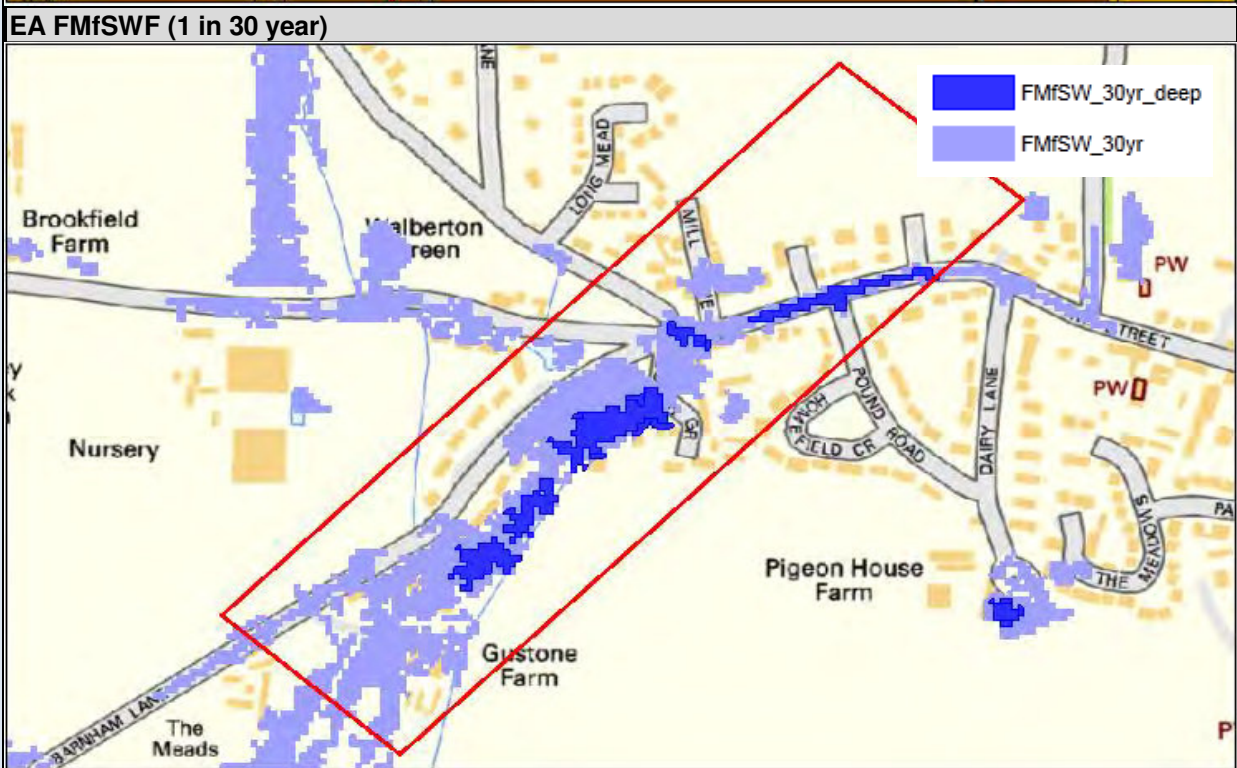
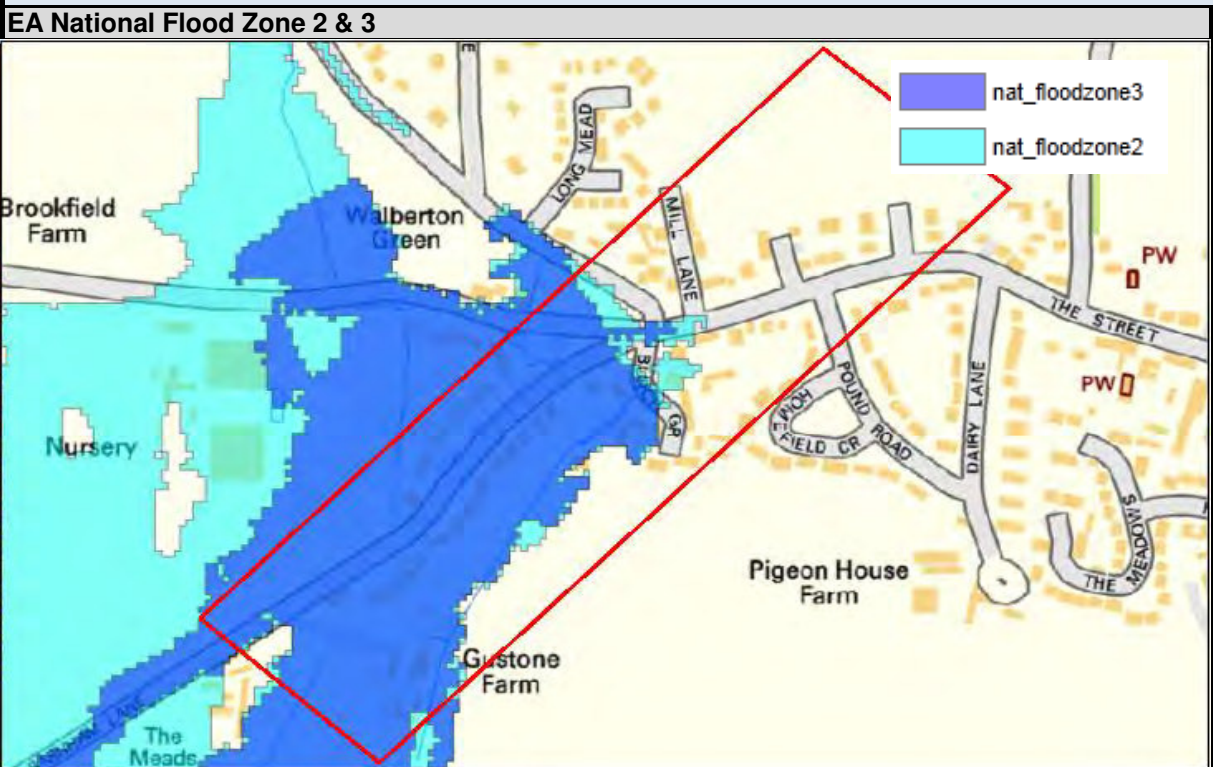
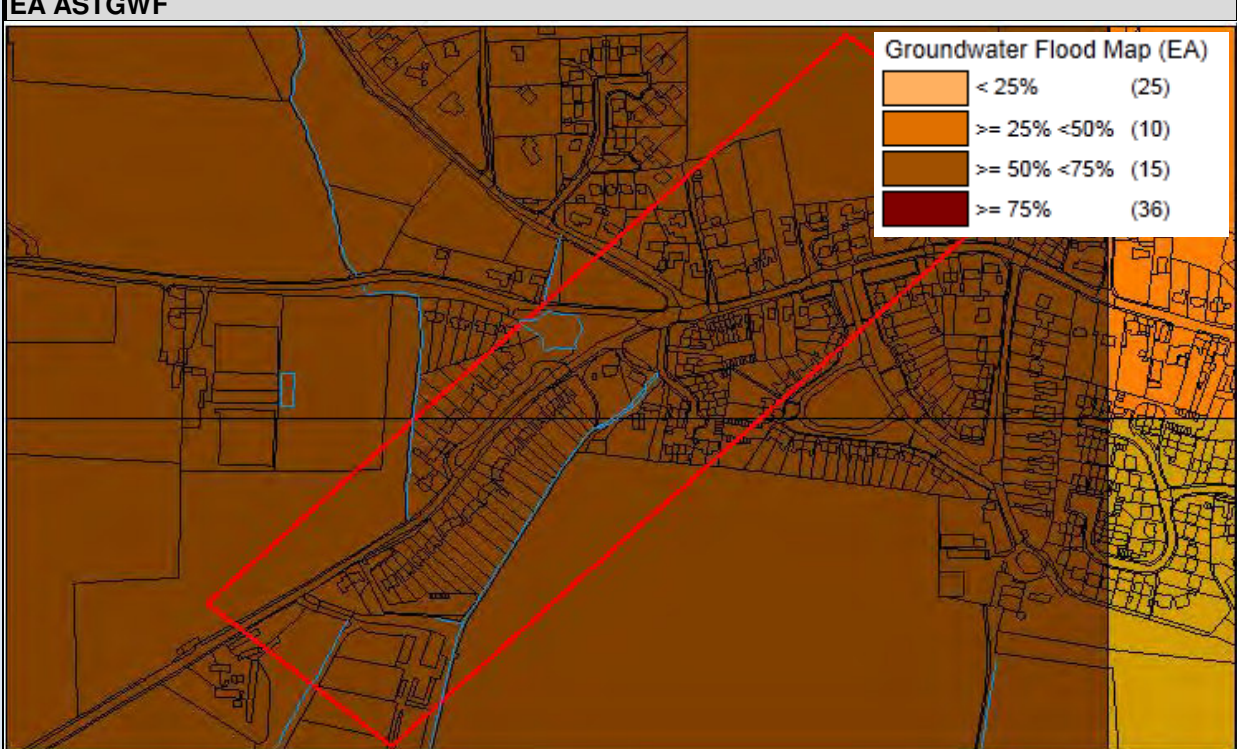
EA National Flood Zones (Flooding from a Fluvial and Tidal sources)
Flood Zone 3: Indicates the areas that have a 1% annual probability of flooding from fluvial (river) sources or a 0.5% annual probability from tidal flooding (assuming no flood defence measures are in place) in any year.
Flood Zone 2: Indicates the areas that have a 0.1 - 1% annual probability of flooding from fluvial (river) sources or a 0.1% annual probability from tidal flooding (assuming no flood defence measures are in place) in any year.

EA Flood Maps for Surface Water Flooding
1 in 30 year: Indicates the areas that have a 3.33% annual probability of flooding from surface water (pluvial flooding).
1 in 200 year: Indicates the areas that have a 0.5% annual probability of flooding from surface water (pluvial flooding).

Terminology Key

AEP (%)	Annual Exceedance Probability: The percent probability that a flood extent will be met or exceeded in any given year.
Fluvial flooding	Flooding from a river source
Pluvial flooding	Flooding of the land surface before water enters any drainage system or river.
Receptors	Potential properties, services or assets at risk of flooding.

Predicted Flooding Data:



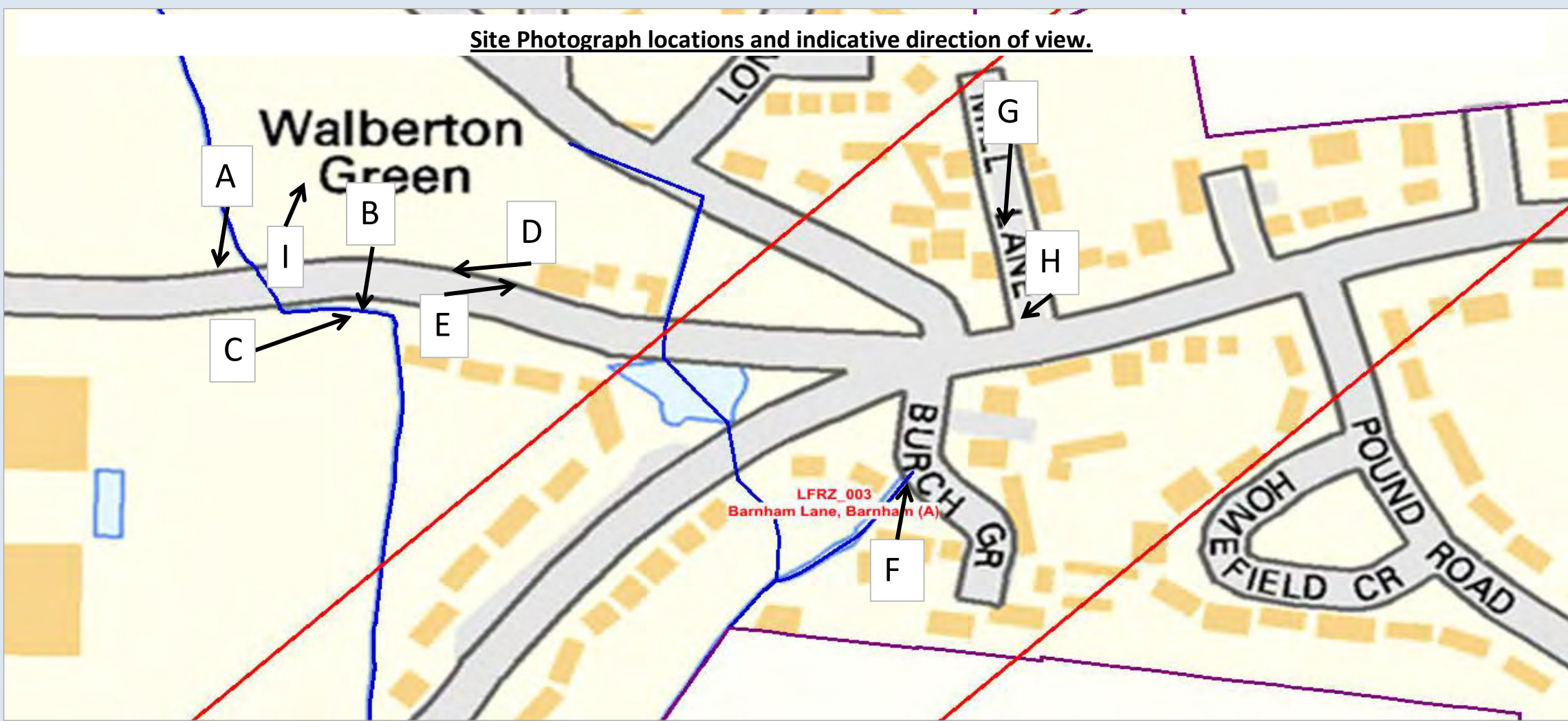
Part 2: Historical Needs

History of Flooding (from Resident engagement)
Flooding as been reported on a regular basis as sourcing from the fields to the north of the village, and the village pond. A report written by the Warberton Parish Council Flood Task Force indicates that flooding is largely winterbourne, with the exceptions of the June/July 2012 extreme event, resulting from prolonged rainfall. Key areas of identified risk are: Barrack Row, Eastergate Lane, The bungalows, Burch Grove, Walberton Green and Walberton Lane.

History of Flooding (from SWMP Partners)
Sewer flooding has been reported in the area following heavy rainfall. Hydraulic overload of the public sewer system has been confirmed by Southern Waters SIFR data and hydraulic model of the wastewater sewer system. Anti Flood Devices are in situ to mitigate sewer flooding at some properties in this LFRZ.

Part 3: Site Assessments	
Site Visit Date	11/11/2013
Site Notes following survey and engagement with residents	
EASTERGATE LANE (EAST): Regular flooding of road. Culvert to the West of the village centre under capacity + flows flood into road and travel down to properties and East towards the village pond. Small holding ditch west of properties along Eastergate Lane with culvert to village pond (primary route of flow). Stop logs creating an overflow to a (est) 600 m dia PVC conduit running under fields to south of properties. Holding ditch and feeding ditches are heavily silted (secondary flow route). BARRACK ROW + THE STREET: Frequent flooding at junction of Barnham Lane and The Street. Flow from ditch in Mill Lane exceeds capacity of culvert under The Street and floods the highway and into properties. Pluvial flow also routes from Field Close and North Pound and routes west towards Barrack Row. Regular RTU after heavy / prolonged rainfall. BURCH GROVE: Village pond exceeds weir and floods into street. Combination of this, and flooding from The Street affects properties in north Burch Grove. BARNHAM LANE: Water pools in back gardens and does not drain. No known flooding directly from Rife in back gardens. Flooding from the Village Pond after prolonged rain routes down Barnham Lane towards properties on the south of the road. RTU reported at these properties.	
Drainage Condition	
Highway Drainage	unknown
Public Sewers	SWS data is available for review.
	Ditches appear relatively clear with the exception of Westergate Lane, although most ditches are silted to an extent.
Stream and ditches	
Initial assessment of Flood Mechanism	
Flooding Area	Assessment
Eastergate Lane (East)	Culvert under Eastergate Lane and holding ditch arrangement often exceeded and surface water routes east along Eastergate lane towards the village pond. Driveways are sloped towards properties. Loss of holding capacity due to siltation and tree litter.
Walberton Lane	This appears to be largely runoff from fields to the north and incapacity of the culvert running under the road to the west of the village. Exceeded flow from the rife then routes down Walberton Lane.
Barrack Row + The Street	Runoff from the fields to the North of The Street enters the ditch along Mill Lane and runs down the roads of Field Close and North Pound. This water pools along The Street at Barrack Row and routes South West towards The Green. Given no nearby evidence of Infiltration on CCTV records, it is assumed that surface water is entering the foul system via manhole covers,
Burch Grove	A combination of the The Street mechanism and overspilling from the village pond adding to surface water collection. Water cannot drain due to saturated ground.
Barnham Lane	Main mechanism appears to be overspilling of the village pond and routing of flow down Barnham Lane, in addition to pluvial waters. Rife at backs of properties is not a reported issue.
Quick Wins or Notional Solutions	
No obvious quick wins. Possible solution for exceedance of Village pond is to reinstate 600 mm dia culvert to west of village as stream and utilize field as storage: would relieve pressure off village pond and afford attenuation of floodwater locally, without passing flows downstream. Possible requirement to lower land in field to avoid flooding Eastergate lane properties. Remeandering unlikely due to resultant increase in sediment load and erosion risk to properties. Bund in field to the north east of the village may provide attenuation and reduction in overland flows entering into the village from this source. Additional works that may contribute would be de-silting and clearing of pond and ditches to ensure unimpeded flow through the LFRZ.	
Part 3: conclusions / recommendations	
Recommend extending LFRZ_003 boundary to include properties in Eastergate Lane. Driving mechanisms appear to be overland flow from fields to the North of the village exceeding the various drainage ditches and culverts. Water cannot route away due to the poor gradient and saturated ground.	
Flood Source	Updated Risk
Pluvial flooding	High
Fluvial flood Risk	High
Ground water flood risk	Medium
Public Sewer Flooding	High
Based on the driving mechanism for flooding	
LFRZ Priority at Part 3	High

Site photographs	
A 	B  C 
D 	E 
F 	G  H 
I 	

Site Photograph locations and indicative direction of view.	
	

Originator
Will Rust (11/12/2013)
Checker
Matt McDonald (20/12/2013)
Reviewer
(00/01/1900)

Terminology Key	
AEP (%)	Annual Exceedance Probability: The percent probability that a flood extent will be met or exceeded in any given year.
Fluvial flooding	Flooding from a river source
Pluvial flooding	Flooding of the land surface before water enters any drainage system or river.
Receptors	Potential properties, services or assets at risk of flooding.

The map shows the Choller area with a red rectangle highlighting the location of the proposed treatment plant. The legend indicates the following symbols:

- Manholes:**
 - Foul
 - Surface Water
- Sewers:**
 - Foul
 - .-.- Rising Main
 - Surface Water
 - Private Sewer
- Main River Watercourse:**
 - ▲ Pumping Station
 - ◆ CSO

History of Flooding (from Resident engagement)	History of Flooding (from SWMP Partners)
Conversations with residents along Barnham Lane indicate flooding from foul manholes in the highway after prolonged rainfall at winter time. Floodwaters remain in the highway for up to four weeks after the storm event and do not drain away. Fields at back of properties also experience waterlogging and pluvial flooding. Worst recent storms: Winter 1999, Summer 2012	Properties at risk from sewer flooding. Multiple reported incidents of flooding from hydraulic incapacity or servability. Unmaintained ditch alongside road – ditch overflows and also affects discharge of highway drainage system. Ditch on northern side of track to North Choller Farm has been filled (vehicular crossing). Some of the highway drainage system in Barnham Lane may discharge into this ditch but outfall is assumed buried. This situation may be contributing to the flooding problem.

Site Visit Date		05/11/2023
Site Notes following survey and engagement with residents		
Area is very flat, with highway ditches running along each side of the road - these appear poorly maintained and overgrown. Rife runs behind properties to West of Barnham Lane. Residents report standing water in road and fields behind properties after prolonged rainfall. Surface water may not be able to drain due to ditch being infilled and/or culvert under field entrance being crushed by heavy farm machinery. Water also rises from foul manholes in road and floods property curtilage. RTU experienced at properties.		
Drainage Condition and Maintenance		
Highway Drainage	WSCC clean highway gullies on an annual basis	
	Occasional 24-hour tankering operations provided by Southern Water Services	
Public Sewers	unknown	
Stream and ditches	unknown	
Initial assessment of Flood Mechanism		
Flooding Area	Assessment	
	Rear of properties: Ground saturation and runoff Front of properties: Flooding from foul manholes in road and routing of flow into road depressions and properties. Highway ditches not operating to convey water away. Possible infiltration into the nearby sewer system or unknown servability issues.	
Barnham Lane		
Quick Wins or Notional Solutions		
Investigate the ditch that flows from the highway toward the rife adjacent to the property and establish the reason for the pooling in Photo A. If this is due to a collapsed culvert at the field entrance (possibly due to heavy machinery), this could be reinstated to allow flow to resume, thus reducing surface water flood risk.		
Part 2: conclusions / recommendations		
Hydraulic assessment to determine mechanism for sewer flooding in roads. Possible improvement of ground / surface drainage conveyance to pond to remove standing water.		
Flood Source	Updated Risk	
Pluvial flooding	Medium	
Fluvial flood Risk	Low	
Ground water flood risk	Medium	
Public Sewer Flooding	High	
Based on the driving mechanism for flooding		
LFR2 Priority at Part 3		
Low		

Site photographs

A

Waterlogged and flooded areas behind properties at Barnham Lane after prolonged rainfall. Water is slowly draining overland to a pond behind the hedgerow.

Site Photograph locations and indicative direction of view.