

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

Our ref: HA/2021/123836/02-L01
Your ref: WA/32/21/PL
Date: 14 February 2022

Dear Sir/Madam

***RESPONSE DOCUMENT SUBMITTED TO OBJECTION COMMENTS* -
ADDITIONAL INFORMATION - CONSTRUCTION OF 30 NO. DWELLINGS
TOGETHER WITH ASSOCIATED ACCESS, PARKING, PUBLIC OPEN SPACE &
LANDSCAPING LAND AT WEST WALBERTON LANE, WALBERTON, BN18 0QF.**

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

The additional submitted information does not satisfactorily address our earlier concerns regarding the placement of the proposed compensation area within the floodplain. We therefore **maintain our objection**.

The information supplied suggests an ecology pond would be located within the compensation area. No information has been supplied to detail how the level of this pond will be managed during periods of heavy rain so that it does not reduce the effective volume of the compensation ahead of a design flood event. There has been no mention of planned maintenance of the clay lining to ensure there will be no groundwater ingress in the future. The impact this will have on groundwater levels is not within our direct remit or expertise, but nevertheless is an important consideration for managing flood risk for this development. Prior to deciding this application we recommend that consideration is given to the impact of this proposal on groundwater levels in the area and the Lead Local Flood Authority is consulted.

The proposed compensation is not level for level and so would require planned maintenance. Over the 100 year lifetime of the development we consider it unlikely that the full compensation volume would still be available in the design event.

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

www.gov.uk/environment-agency

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Very little detail has been provided regarding compensation volumes. No information has been provided regarding the volume lost to land raising and the overall balance after the provision of compensation. The documents provided state that the volume calculations have been carried out in PDS ground modelling software. We would need to see the outputs from these calculations including a table showing volume lost to volume gained and overall balance.

This objection is in line with the National Planning Policy Framework (NPPF) paragraph 159 which directs inappropriate development away from areas at high risk of flooding and ensures that development in those areas should be made safe for its lifetime without increasing flood risk elsewhere.

Overcoming our Objection

We consider that to **overcome our objection** the scheme would need to be redesigned to keep the proposed development and flood compensation out of flood zone 3. This may require the application to reduce the number of proposed units at this site. If this cannot be achieved, we are likely to maintain our objection.

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

