

From: Simon Davis
Sent: 01 September 2026 09:55
To: 'Harriet Lobacz' [REDACTED]
Cc: [REDACTED]
Subject: FW: Land East of Wandleys Lane - WA/51/26/RES

Dear Harriet,

Please see below and attached (comments in black) representing Cllr McAuliffe's response to your hydrology comments. Please can you respond.

Kind Regards

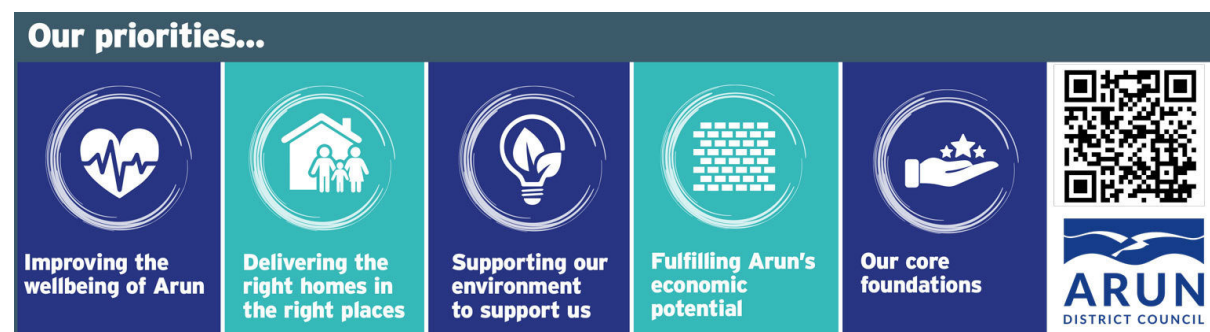
Simon

Simon Davis MRTPI
Principal Planning Officer, Directorate of Growth

T: 01903 737874
E: simon.davis@arun.gov.uk

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Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Cllr. Stephen McAuliffe <Cllr.Stephen.McAuliffe@arun.gov.uk>
Sent: 01 September 2026 08:00
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Jonathan Best <Jonathan.Best@arun.gov.uk>
Subject: RE: Land East of Wandleys Lane - WA/51/26/RES

Dear Simon,

Please accept my apologies for the delay in responding to this – all very busy atm I am afraid so less time than usual to spend on Council matters during the normal working week.

Having read the submission from Henry Adams it is extremely concerning that there does not appear to be either an understanding of the requirements of the Planning Inspector's Condition, nor is there any evidence that provides the necessary detail required to meet said Condition. Currently, the Developer has provided unsubstantiated opinion that impact will not occur. This falls short of the evidence-base required to show that development can be achieved whilst also safeguarding the ancient woodland from loss or deterioration.

In order for the Inspector's Condition requirements to be met, the developer needs to provide proven designs from similar projects that achieved ancient woodland (or perhaps other similarly irreplaceable habitats) protection that was at risk from local environmental change resulting from development and construction activities. This was stated by the Developer at the Hearing '*...as being possible and achieved elsewhere..*' and was a key factor in the Inspector's decision and inclusion of the Ancient Woodland protection Condition.

I have addressed each of the statements made in greater detail in the attached.

Regards,
Steve

Protection of existing groundwater conditions: Existing groundwater levels within the Ancient Woodland are not anticipated to materially change as a result of the development, as the proposed construction works are located outside the woodland and its designated buffer zone. The development will therefore not directly intercept groundwater within the woodland or materially alter the existing groundwater regime.

This statement fundamentally misunderstands the purpose and function of 15m buffer zone during construction and demolition. The sole function of 15m buffer zones is to prevent damage or loss of tree roots. The buffer zone is neither designed, nor intended, to minimise or prevent changes to local hydrology and maintain ancient woodland health. Therefore, the statement *‘...as the proposed construction works are located outside the woodland and its designated buffer zone the development will therefore not directly intercept groundwater...or materially alter the existing groundwater regime’*, is not a statement that can be correctly made or accurately determined at this point. The assertion that the 15m buffer is sufficient to avoid changes in local hydrology is a subjective opinion that is not currently based on any formal assessment or evidence. Government Guidance states that *‘where assessment shows other impacts are likely to extend beyond this (15m) distance, the proposal is likely to need a larger buffer zone’*. Therefore, assessments are required to determine if a larger buffer zone is needed and these not to date been undertaken by the developer for this project. A wider-scale formal assessment of the local hydrology and the interactions thereof with the ancient woodland is therefore required to determine whether a larger buffer zone than the 15m proposed is necessary.

Retention of existing surface-water inputs: Existing surface-water inputs and drainage pathways towards the woodland will be maintained. The Ancient Woodland buffer zone provides a physical separation between the development and the woodland, within which existing ground levels, ground profiles and surface-water conditions will be retained. Changes to levels, earthworks and drainage arrangements within this area will be avoided, preventing unnecessary disruption to existing runoff routes and shallow subsurface flow paths.

This statement relies heavily on the 15m buffer zone acting as the sole variable in the maintenance of local hydrology rather than acknowledging that the buffer is root

protection only. To meet the aim of the Inspector's Condition it must be demonstrated, with evidence, that the changes in levels and aspect within the site boundary as a whole, will not result in loss or deterioration of the ancient woodland through changes in local groundwater levels and soil flow regimes. The statement does not address the role of deeper water movement in this regard.

Infiltration and groundwater recharge: Where groundwater levels, soil conditions and geotechnical constraints permit, unlined rain gardens, permeable paving and other infiltration features will be maximised within the development. Clean roof water can also be directed towards suitable infiltration or recharge features located between the development and the woodland, helping to maintain local recharge without introducing concentrated flows to the woodland.

The introduction of these measures is welcomed. However, the efficacy of the proposed measures needs to be demonstrated through calculations of the water volumes lost from the soil post-development, and, the recharge potential of the measures outlined. Locations of these features, their relative contribution(s) to saturated and unsaturated flow maintenance along with modelling of soil preferential flows, would be important in determining whether the plans could be considered sufficient to maintain woodland hydrology in its current form and allow the development to proceed. In the absence of this, it is not clear how the Condition could be sufficiently met.

Diffuse drainage along the woodland interface: Where appropriate, linear infiltration trenches, filter drains, swales or recharge strips can be incorporated along the woodland interface. These features would provide a more diffuse mechanism for managing water and, where infiltration is appropriate, help maintain existing patterns of groundwater recharge rather than introducing new concentrated discharge points.

The acknowledgement in this statement that existing diffuse patterns of groundwater recharge maintenance are important for woodland health is welcomed. As set out by the developer at Hearing, confirmations were given that maintaining these diffuse interactions between landscape and woodland have been achieved at other projects. Information of where such engineering solutions have been successfully introduced elsewhere would be a powerful demonstration that the same outcomes could feasibly be achieved at this development site.

Site-specific modelling showing how the proposed flow rates and diffusion patterns will be maintained in the long-term would demonstrate that this potential impact can be reasonably managed. Confirmation that these patterns could be maintained in the absence of anthropogenic input i.e. documented details of a self-sustaining, nature-based water diffusion plan that mirrors and maintains existing flow regimes, would be necessary. If, however, it is envisaged that long-term management via human/mechanical intervention will be required on a permanent basis, this should be clearly stated. In either scenario, an approved water management and control plan will be necessary to illustrate how the flows will be maintained in the long-term.

Protection of the woodland buffer and existing flow paths: Permeable landscaped areas within the woodland buffer will be retained wherever practicable. The design will avoid unnecessary drainage infrastructure, significant earthworks, service corridors or foundations within the buffer that could intercept or redirect existing shallow groundwater or surface water flow paths. The retention of the existing levels and ground profile within the buffer is a key measure in maintaining the current hydrological relationship between the site and woodland.

The retention of existing levels and ground profiles is cited in the above statement as a ‘...key measure for maintaining the current hydrological relationship between the site and the woodland.’ It is not however identified how this will be secured, nor are there unambiguous guarantees that this will indeed be the case. For example, there is a contradiction with the above statement and the assertion given in point 1 regarding an absence of impacts within the buffer zone. In point 1, it is stated that ‘*The Ancient Woodland buffer zone provides a physical separation between the development and the woodland, within which existing ground levels, ground profiles and surface-water conditions will be retained.*’ In the above statement however, it is stated that permeable landscape within the buffer zone will be ‘...retained wherever practicable...’ intimating that non-permeable areas may be introduced should the project require them – thus rendering the assurance in point 1 void. Any introduction of non-permeable infrastructure and hard landscaping within the buffer zone would need to be modelled for ancient woodland (direct and indirect) impacts in order to meet the requirements of the Inspector’s Condition.

Control of discharge rates and erosion risk: Drainage outfalls will be designed to discharge at controlled rates, including the relevant greenfield runoff rate/QBAR where applicable. This ensures that the development does not introduce materially increased rates of discharge towards the woodland that could result in erosion, scour, waterlogging or other adverse hydrological effects. Controlled discharge also ensures that the receiving system is not subjected to concentrated flows significantly greater than those arising under existing conditions.

This approach is considered reasonable and practicable and is welcomed. Prior to the discharge of the condition, details should be secured via documentation which includes details of the planned volumes and rates as well as the mechanisms involved in maintaining those flows.

Protection of water quality: Water quality reaching the woodland is not anticipated to deteriorate as a consequence of the development. The immediate area adjacent to the Ancient Woodland will retain its existing levels, ground condition and runoff characteristics within the protected buffer. In addition, runoff generated by the development will be managed through the proposed SuDS treatment train, providing appropriate treatment before water is discharged or allowed to infiltrate.

To support the statement around there not being an anticipation of a deterioration in water quality, additional details and clarifications are necessary. Whilst it may not be anticipated that water reaching the woodland will result in deterioration, evidence that this will be the case has not been provided. It is not clear from the statement whether the developer is referring to physical quality, chemical quality or both. The available documentation identifies on-site attenuation basins but the plans do not contain information regarding the SuDS treatment train or subsequent water quality parameters of discharges i.e. expected pollutant loadings; method of treatment and their efficacy in relation to identified foreseeable pollutants; existing baseline water quality needing to be achieved (taking into account any dilution factors); potential pollution pathways and pollution prevention measures in any such pathways.

Construction dewatering and temporary works: Construction dewatering is not anticipated to materially affect groundwater or water levels within the woodland. Construction activities will be controlled through a Construction Surface Water

Management Plan (CSWMP), which will address temporary drainage, dewatering, surface-water management, ground compaction and protection of existing drainage pathways. The CSWMP will be subject to regular monitoring and inspection by an appropriately qualified consultant, with additional measures implemented if monitoring identifies an unexpected change in hydrological conditions.

As above, anticipation is not sufficient to meet the Inspector's reasons for including the Ancient Woodland protection Condition. Whilst it is agreed that a fully implemented CSWMP can be an effective method of preventing adverse impacts on water arising from construction activities, details are required. Therefore, identification of the monitoring regime will be important. Transparency of monitoring schedules, parameters being assessed and the reporting of all independent findings should be agreed prior to discharge of condition.

Avoidance of construction-related disruption: Construction activities will be planned and managed to prevent temporary works, site compounds, haul routes, excavation, compaction or temporary drainage from unnecessarily interrupting groundwater movement or surface-water flow towards the woodland. Any temporary drainage arrangements will be designed to maintain appropriate water management throughout the construction period rather than relying solely on the permanent drainage strategy.

The statement '*...unnecessarily interrupting groundwater movement...*' indicates that there will be necessary interruption of groundwater during the development. There is therefore a need to understand the details of these necessary interruptions. All activities with foreseeable potential impact on groundwater flows, that in turn have the potential to affect ancient woodland health, should be identified, risk assessed, and mitigated/removed from the risk hierarchy. Documented details of these factors would be required to satisfy the Condition e.g. contained within an evidence-based impact assessment and mitigation plan.

Monitoring and adaptive management: Where considered necessary, monitoring points and adjustable drainage controls can be incorporated into the drainage strategy to provide an opportunity to monitor groundwater or surface-water conditions and confirm that the agreed hydrological objectives are being maintained. This provides an adaptive

mechanism whereby additional mitigation can be considered if monitoring identifies an unexpected adverse change.

If measures such as monitoring points and adjustable discharge controls are to be introduced to satisfy the Condition, details of their purpose, operation and management along with rationales for their inclusion e.g. case study precedent should be provided. Whilst measures and techniques described *could* be introduced, if they are deemed necessary to meet the Condition, it should be clearly stated, where, why and how they will be introduced along with the clear confirmation that they *will* be introduced. Plans should therefore be submitted and evaluated for efficacy prior to discharging the condition.

Overall impact on the Ancient Woodland: Taking the above measures collectively, the development maintains a clear physical separation from the Ancient Woodland, retains existing levels and ground profiles within the buffer, maintains appropriate surface-water inputs and flow paths, provides opportunities for continued infiltration and recharge, controls discharge rates and water quality, and manages construction-phase risks. On this basis, the development is not anticipated to result in a material change to groundwater levels, surface-water inputs, water quality or the hydrological conditions supporting the Ancient Woodland.

This conclusion cannot be wholly supported from the statements provided. Whilst it is agreed that construction-phase risks could be effectively managed, the developer has not provided evidence through data, modelling or precedent, that maintaining the physical connection via the existing groundwater system can be achieved. This was highlighted as necessary by the Inspector and the developer assured the Inspector that this could be accomplished.

Current Government Guidance states that 15m is the minimum requirement for ancient woodland protection and changing the water table or drainage conditions can result in damage or loss of ancient woodland. Further, Government Guidance states that where assessment shows other impacts are likely to extend beyond this (15m) distance, the proposal is likely to need a larger buffer zone. Developer statements to date have not adequately assessed the necessity for a larger buffer zone in any systematic way or use of established impact zone assessment methods. Neither has the developer been able

to provide evidence demonstrating where engineering solutions have been successfully employed at other ancient woodland sites adjacent to development. Rather, the developer has sought to establish that there is no physical link nor likelihood of an adverse impact due to the existence of the minimum 15m buffer. This is contrary to the Inspector's view, the statements made at hearing and Government Guidance.

In conclusion, the developer is yet to sufficiently demonstrate, with evidence, that the development can be achieved in alignment with the Inspector's requirement to safeguard ancient woodland from loss or deterioration. Consequently, it is not clear how the Discharge of the Condition relating to Ancient Woodland protection can be given at this time.