

[REDACTED]

Sent: 17 August 2026 14:56
To: Planning
Subject: IMPORTANT NEW FINDINGS DC/25/2114
Attachments: MAINTENANCE ACCESS.pdf
Categories: Comments Received

**PROPOSED SWALE MAINTENANCE ACCESS ACROSS FLOOD-PRONE
LOCAL WILDLIFE SITE LAND IS
NOT DEMONSTRATED TO BE PRACTICALLY DELIVERABLE**

Dear Mr Holmes

I wish to raise a fundamental practical flaw in the applicant's proposed arrangements for maintaining the swale.

The applicant's own drainage strategy states:

"Access for maintenance of the swale will be possible from the north due to the extensive land ownership to the north of the Site."

Land ownership does not demonstrate that practical maintenance access exists.

The applicant's own documents establish that:

- The swale is an integral part of the development's surface-water drainage and treatment system and requires regular, continuing maintenance.

- The maintenance schedule requires monthly litter and debris removal, grass cutting, vegetation management, inspection and clearance of inlets, outlets and overflows, inspection for ponding, compaction and silt accumulation, together with periodic sediment removal and remedial works.
- Carrying out those operations over the lifetime of the development will inevitably require maintenance equipment and vehicles, including the means of removing accumulated silt, vegetation, litter and other material from the drainage system.
- The applicant expressly proposes that access for this maintenance will be from the north.
- Yet the applicant's own Flood Risk Assessment acknowledges that this **northern land is liable to flooding**.
- In the modelled surcharged-outfall scenario, the assessment states that this "results in flooding from the swale of 33.3m³" and confirms:

"Flooding from the swale would spill into the field to the north, which would already be inundated due to the fluvial event."

- This is the same field across which the applicant proposes maintenance access to the swale.
- That northern field also forms part of the River Adur Water Meadows and Wyckham Wood Local Wildlife Site. Taking maintenance vehicles across flooded or heavily waterlogged LWS land presents an obvious risk of rutting, soil compaction and damage to its vegetation and ground conditions.

The practical contradiction is therefore stark:

How are the vehicles and equipment required to maintain the swale supposed to cross the northern field when that field is flooded or heavily waterlogged — precisely when inspection, clearance or remedial work to the drainage system may be most important?

The assertion that access is possible simply because there is "***extensive land ownership to the north***" does not answer that question. Ownership is not access, and it certainly does not demonstrate a viable year-round maintenance route across flood-prone LWS land....or as shown on the attached map how can access be made **without removing part of an important tree/mixed shrub habitat to the north east of the land**.

The swale is not an optional landscape feature. It is essential drainage infrastructure upon which the development relies. If the applicant cannot demonstrate how that infrastructure can actually be accessed and maintained under the conditions its own Flood Risk Assessment predicts, then the drainage strategy has not demonstrated a workable long-term solution.

This is not a minor detail to be resolved later by a management company. It is a fundamental design requirement which should have been resolved before the scheme was put forward.

The applicant has identified the maintenance requirement, identified access from the north, and identified that the same northern land can be inundated. What it has failed to demonstrate is how those three facts can practically coexist.

In my view, that is a fundamental flaw in the drainage strategy and one which cannot simply be deferred to condition or left for somebody else to solve after planning permission has been granted. The application should be assessed on whether the drainage system proposed now is demonstrably workable and maintainable for its lifetime. On the evidence submitted, it is not.

Yours faithfully



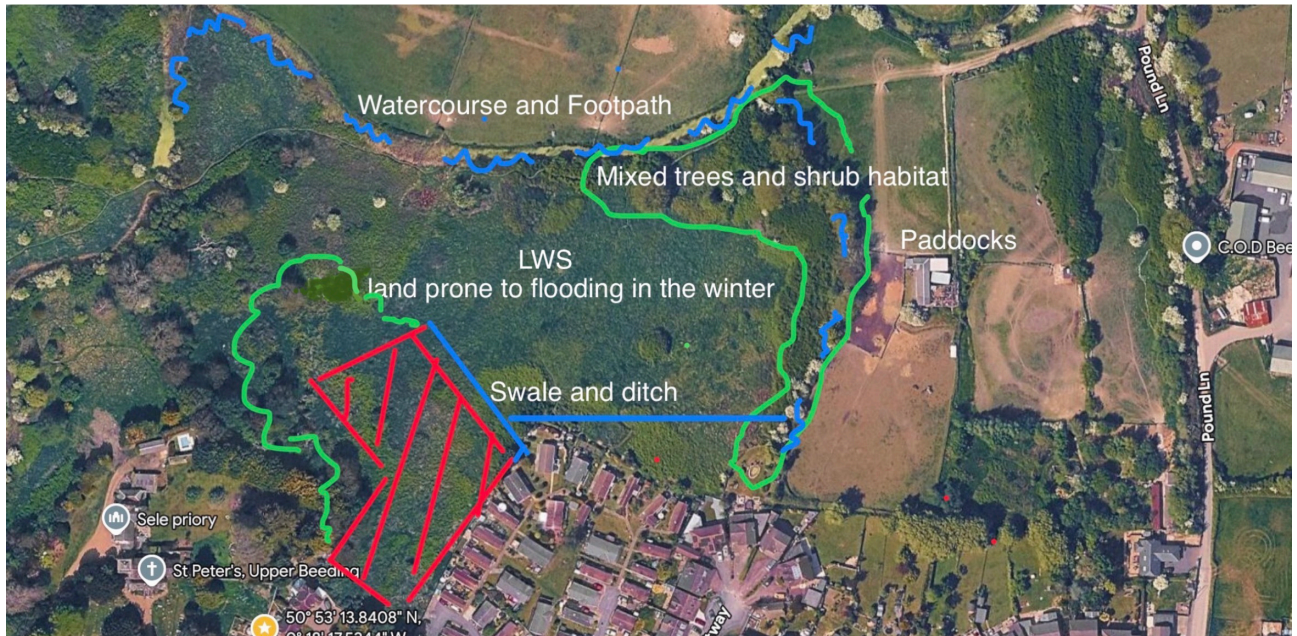
Oxcroft

Attached map....two pages

Sent from my iPad

Maintenance access route 'from the north' ?

Question.....How do Maintenance vehicles transverse through a mixed tree shrub area without causing any harm or damage to this habitat that is fully within the Local Wildlife



Site.

No Access from South.....note residents parking in Church Farm Walk at bottom left.

