

Sent:
To:
Subject:

11 May 2026 20:48
Planning
Response

Categories:

Comments Received

Planning Application DC/25/2114

Dear Mr Holmes

I wish to submit a further and final objection in response to the updated drainage information prepared by Aqua Terra Consultants Ltd in support of the proposed development.

The revised statement remains fundamentally inadequate in its consideration of the ecological sensitivity of the site and adjoining land. Whilst additional commentary has been added regarding surface water flows, a proposed “road-hump” mitigation feature at Church Farm Walk, and maintenance of the swale to the rear of the proposed properties, the submission continues to assess drainage solely from an engineering perspective and fails to demonstrate any meaningful consideration of the ecological impacts arising from altered runoff patterns within a highly sensitive designated landscape.

Importantly, I yet again point out that the development site sits entirely within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site (LWS). This has already been formally highlighted by Sussex Wildlife Trust, who stated that the development would result in the destruction of part of the LWS and raised specific concerns regarding indirect impacts to the remaining site through surface water runoff, pollution, and associated residential impacts.

Despite these concerns having already been clearly identified by Sussex Wildlife Trust, the updated Aqua Terra submission still fails to demonstrate:

- that the hydrological relationship between the development site and the remaining Local Wildlife Site has been properly assessed;
- that redirected surface water flows would not adversely affect sensitive meadow habitats;
- that runoff diversion onto adjoining open land would avoid increased saturation, erosion, sediment transfer, nutrient enrichment, or pollution impacts;
- or that the proposed drainage mitigation has been designed with regard to the ecological function and sensitivity of the Local Wildlife Site.

The statement repeatedly refers to runoff being diverted onto “open space”, yet fails to acknowledge that this land forms part of, or directly adjoins, an ecologically designated and highly sensitive habitat area. This omission is particularly concerning given that the applicant now explicitly proposes directing excess runoff away from engineered drainage systems and onto adjacent land.

Whilst swales are recognised as part of sustainable drainage practice, official Government and Environment Agency guidance acknowledges that surface water drainage systems can become inadequate during extreme rainfall events and under future climate change conditions. National reviews into surface water flooding have identified increased rainfall intensity, underestimated runoff, and inadequate SuDS maintenance as contributing factors to drainage failure and flooding. Given the proposed swale’s close proximity to the River Adur Water Meadows and Wyckham Wood Local Wildlife Site, insufficient evidence has been provided to demonstrate that exceedance events, prolonged saturation, overtopping, or future maintenance issues would not adversely affect the hydrology and ecological integrity of this sensitive designated habitat.

Official SuDS guidance recognises that swales require ongoing inspection, vegetation management, erosion repair, sediment removal, and maintenance access for personnel, vehicles, and machinery. However, the applicant has provided no realistic explanation as to how such maintenance access could occur across the River Adur Water Meadows and Wyckham Wood Local Wildlife Site without causing ecological harm. No details have been provided regarding the type of equipment required, whether vehicle access would be necessary during wet conditions, how soil compaction and rutting would be avoided, or whether temporary or permanent access tracks may ultimately be required. The mere assertion that access is possible “from the north” due to land ownership does not demonstrate that ecologically acceptable long-term maintenance access can be achieved.

In my view, the submission therefore fails to satisfactorily address the concerns already raised by Sussex Wildlife Trust and does not demonstrate compliance with Policies 25 and 31 of the Horsham District Planning Framework, nor with paragraphs 188 and 192 of the National Planning Policy Framework, all of which require designated ecological sites to be safeguarded from harm.

The absence of any site-specific ecological-hydrological assessment remains a significant deficiency in the application. As submitted, there is insufficient evidence to

conclude that the proposed drainage strategy would avoid adverse impacts upon the integrity, hydrology, and ecological function of the remaining Local Wildlife Site.

I respectfully request that these matters are given full and proper weight in the determination of this application.

Kind regards



Oxcroft
Church Farm Walk

Sent from my iPad