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Sent: 18 March 2026 14:40
To: Planning
Subject: Formal Objection – Foul Drainage and Swale Overflow Risk to Sensitive Wildlife (Application DC/25/2114)

Categories: Comments Received

Dear Mr. Holmes

I understand from my neighbour that he has spoken to you recently and that you are willing to accept further comments re. Planning Application DC/25/2114 especially as the Flood Risk Assessment and Outline Drainage Strategy and ECE Planning report have only just appeared on the public portal....giving me the opportunity to respond so I thank you for taking the time to read my email below.

I have reviewed the Flood Risk Assessment and Outline Drainage Strategy for planning application DC/25/2114 and wish to formally object to the proposed drainage and foul water strategy. The proposal fails to comply with relevant planning policy and environmental legislation, including the National Planning Policy Framework (NPPF) and the Water Environment (Water Framework Directive) Regulations, which require development to avoid adverse impacts on designated sites and protected habitats.

The site lies entirely within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site, an area of high ecological importance. A watercourse at the base of the site drains the wet meadows and feeds a tributary of the River Adur, forming part of a chalk-influenced hydrological network. This feature is integral to the ecological function of the Local Wildlife Site. Any discharge, overflow, or contamination from the proposed system would pose a direct and unacceptable risk to this watercourse and downstream environmentally sensitive stream habitats.

The hydrology and flood risk assessment confirms that in extreme or blocked conditions, exceedance flows will be directed to the swale, and once capacity is exceeded, water will spill into the open fields to the north—within the Local Wildlife Site. A surcharged outfall scenario (4.76 m aOD, 1% AEP with climate change allowance) similarly results in overflow into the same area. This demonstrates that overflow into ecologically sensitive land is not merely theoretical, but an anticipated outcome under certain conditions.

Furthermore, the report acknowledges that “there is always a residual risk of flooding due to more extreme events or blockage of structures.” This clearly indicates that the system cannot guarantee

containment. As such, the possibility of swale overflow or failure of the pumped sewage system remains, with a consequent risk of contaminated water entering the surrounding sensitive environment.

The report also states that “groundwater poses the only source of flood risk,” however this does not account for the risk of surface or grey water runoff, particularly given the sloping nature of the site. In the event of swale overflow or failure of the pumped system, water could flow directly downhill into the immediately adjacent fields, which are hydrologically connected to the Local Wildlife Site and its watercourses.

Of particular concern is that these same adjacent sloping fields have been identified as the area intended to deliver the development’s 10% biodiversity net gain. This creates a clear and fundamental contradiction: the land proposed for ecological enhancement is also the area most at risk of receiving contaminated runoff and overflow. This raises serious concerns regarding the effectiveness, credibility, and deliverability of the biodiversity strategy.

The site also supports protected biodiversity, including Barbastelle bats. Even minor contamination could harm the local insect population, which forms a critical foraging resource for these bats. Pollution events could therefore result in lasting ecological damage, affecting both designated biodiversity enhancement areas and the wider ecosystem.

The proposed foul drainage strategy is inherently less resilient than a gravity-fed system, as it relies entirely on mechanical and electrical pumping infrastructure, creating a clear single point of failure. A dual pump system provides limited redundancy but does not prevent failure in the event of blockage, overload, or downstream restriction. Under such conditions, there remains a clear risk of sewage backing up and overflowing into the surrounding environmentally sensitive areas. Pump malfunction, power outage, blockage, or capacity exceedance could result in sewage backup or uncontrolled discharge. Pumping stations are widely recognised as being vulnerable to clogging from non-flushable materials such as wet wipes and debris, which can significantly impair performance or lead to system failure. Such incidents are well documented and demonstrate that these risks are not hypothetical but occur in practice.

The reliance on a privately maintained system raises further concerns regarding long-term management, accountability, and contingency planning. The submission provides insufficient evidence that robust, enforceable maintenance, monitoring, and emergency procedures will be secured over the lifetime of the development, leaving the risk of untreated sewage release inadequately controlled.

Even minor contamination could irreversibly harm protected flora, invertebrates, and wildlife, particularly within a sensitive and hydrologically connected habitat. The proposal does not demonstrate that this risk has been adequately avoided in accordance with the mitigation hierarchy.

In summary, the proposed drainage and foul water system is inappropriate for this sloping and environmentally sensitive site. It relies on pumped infrastructure prone to failure, allows for

acknowledged exceedance and overflow into ecologically important land, presents a clear risk of contamination to designated wildlife habitats and watercourses, and undermines the stated objective of delivering biodiversity net gain.

As such, the proposal appears to conflict with the Environment Act 2021, the NPPF, and the Water Framework Directive Regulations, all of which require development to avoid environmental harm and protect ecological integrity.

Yours faithfully

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Sent from my iPad