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To:
Subject:

29 April 2026 19:18
Planning
DC/25/2114

Categories:

Comments Received

Response to Updated Flood Risk Assessment and Outline Drainage Strategy

Formal Objection – Application Ref: DC/25/2114 – Church Farm, Upper Beeding

Dear Mr. Holmes

I write in response to the updated Flood Risk Assessment and Outline Drainage Strategy submitted in support of this application.

While the updated submission responds to drainage engineering comments, it does not address the site's ecological designation or the implications this has for drainage design and risk.

The submitted information fails to recognise or assess a fundamental and highly material constraint. The application site lies wholly within the River Adur Water Meadows and Wyckham Wood Local Wildlife Site, yet this designation is not acknowledged within the drainage or flood risk documentation. This omission is significant and renders the submitted information fundamentally incomplete.

Local Wildlife Sites are identified and protected through planning policy as areas of substantive ecological importance. Under the National Planning Policy Framework (NPPF), development must avoid harm to such sites and must not result in adverse impacts on biodiversity, including indirect impacts arising from changes to hydrology or water quality.

In addition, local planning policies require that development proposals conserve and enhance biodiversity and ensure that designated sites are not adversely affected.

The submitted drainage information fails to demonstrate compliance with these requirements for the following reasons:

1. Failure to recognise the designated site

There is no reference to the Local Wildlife Site within the drainage or flood risk documentation. As a result, there is no assessment of how the proposals interact with or affect this sensitive ecological designation.

2. Absence of any hydrological or ecological consideration

The site forms part of a water meadow system, where ecological value is intrinsically linked to water levels, flow patterns, and seasonal variation. The submission contains no analysis of how the proposed drainage strategy may alter these conditions.

3. No assessment of water quality impacts

There is no evidence that surface water runoff or foul drainage will be treated to a standard appropriate for discharge in or adjacent to a designated ecological site. The absence of any water quality assessment is a critical deficiency.

4. Unquantified risk from foul drainage infrastructure

The proposed reliance on a private packaged pumping station introduces a clear risk of failure, overflow, or leakage. No information is provided on contingency measures, storage capacity, or system resilience. In a location of this sensitivity, such risks are unacceptable.

The Environment Agency regularly reports pollution incidents involving pumping stations.

5. Reliance on measures unrelated to ecological protection

The measures described within the submission (including raised finished floor levels and minor bunding) relate only to flood risk to property and do not address the protection of the ecological site.

Conclusion

The application fails to demonstrate that the proposed development will avoid harm to the River Adur Water Meadows and Wyckham Wood Local Wildlife Site. The absence of any meaningful assessment of hydrological or water quality impacts means that compliance with national and local planning policy has not been established.

This is a fundamental flaw in the application.

Kind regards

[REDACTED]

Oxcroft

Church Farm Walk

Upper Beeding

Sent from my iPad