

Horsham District Council
Planning team
Park North
North Street
HORSHAM
West Sussex
RH12 1RL

Our ref: HA/2023/125468/01
Your ref: EIA/23/0007
Date: 13 November 2023

Dear Planning team (FAO: Jason Hawkes),

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING OPINION REQUEST IN RELATION TO THE PROPOSED WEST OF IFIELD DEVELOPMENT.

Thank you for consulting the Environment Agency on the above Scoping Opinion. We have reviewed the submitted 'EIA Scoping Opinion Request Report' (dated 17 October 2023) and our comments are set out below in relation to matters within our remit.

Fluvial flood risk

The submitted Scoping Opinion report includes a chapter (chapter 13) on surface water and flood risk. It is welcomed that these aspects are scoped into the Environmental Statement as, due to the nature of the flood risk at the proposed development site, it is essential this element is assessed in detail and any development designed to ensure the development is safe for its lifetime without increasing the risk of flooding elsewhere.

Although the chapter is generally high level in its detail, paragraph 13.6.2 states that a Flood Risk Assessment (FRA) will be prepared for the proposed development, providing an assessment of flood risk from all sources, along with the identification of any mitigation works required to manage the flood risk throughout the lifetime of the proposed development whilst ensuing flood risk elsewhere is not increased. The submission of an adequate site-specific FRA is an essential document to support the proposed development, especially considering the proposal for a new bridge crossing the River Mole, the access road crossing the floodplain and flood compensation storage areas.

In addition, the FRA must:

- Consider the cumulative impacts of this development on other areas up and downstream of the proposed development.
- Take into account the most up-to-date climate change allowances. These can be found on the gov.uk website - [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/flood-risk-assessments-climate-change-allowances).
- Consider flood risk across the lifetime of the development, which for residential is

100 years (noting that paragraph 4.3.1 refers to a design life of 60 years).

- Fully cover the risk to flooding throughout the lifetime of the development, so it should refer to the construction phases to demonstrate that flood risk will not be increased at any time during the duration of works at the proposed development site.
- Consider development within the functional floodplain/Flood Zone 3b, taking into account the most up-to-date guidance on the definition of Flood Zone 3b.
- Flood storage compensation should be on a level-for-level basis and hydraulically and hydrologically linked.

We would direct the Applicant to review the [Planning Practice Guidance for Flood risk and coastal change](#) which was updated in August 2022 for further guidance on site specific FRAs.

We would expect any new bridge to be clear span, being a bridge that requires no bed or bank reinforcement and no support in the watercourse.

Please note that this development and the associated works on the site will require a permit from us under the Environmental Permitting (England and Wales) Regulations 2016 from us for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the designated main rivers. This type of permit is called a 'Flood Risk Activity Permit'. Further details about Flood Risk Activity Permits can be found on the gov.uk website using the following link –

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

The Lead Local Flood Authority should be consulted on all matters relating to surface water flood risk.

River corridors

We welcome the reference to buffers of between 25m to 30m being provided along river corridors and water bodies (paragraph 7.6.1) as this will bring multiple environmental benefits in terms of water management, water quality, habitat creation and biodiversity. We would encourage the buffer zones to be as natural as possible, include native planting and not include any structures within them.

Table 13.4

We note that Table 13.4 incorrectly reflects the current WFD classification of the River Mole as 'good'. The table should be in line with paragraph 13.4.10.

If you have any queries regarding the above information, please do not hesitate to contact the advisor identified below.

Yours faithfully,

Environment Agency – Solent & South Downs

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