

# 10 GOOD REASONS

## WHY WE SHOULDN'T BE BUILDING ON MALLING BROOKS

### From the Lewes Coalition

**Planning application number** LW/07/1608

**Applicants name:** Terracotta Properties (Malling Brooks) Ltd

**Proposal:** Planning Application for erection of seven units including B1, B2 and B8 together with long-stay car park (70 spaces) and associated landscaping

**Site:** Land East of Malling Estate, Brooks Road, Lewes, E. Sussex.

**Grid reference:** TQ4210

**The Malling Brooks planning application to build industrial units, an office block and a large car park on a greenfield site defies common sense and ignores expert evidence. It will increase flood risk and create unnecessary buildings.**

1. **It is a valuable part of the natural flood plain:** Malling Brooks is one of the last remaining parts of Lewes's natural flood defense system. Any construction on it would only increase, not decrease, flooding in its vicinity.
2. **Flood risk here is complex:** To call the area a 'protected cell' is misleading: the new flood defense protects it from *river* flooding. The site remains vulnerable to significant flooding from other sources behind the new flood defense — springs and streams discharging often heavy loads of water from the surrounding chalk hills as well as the accumulation of ground water and drainage overflow into the lowest point in the Malling Brooks.
3. **Climate change** in the coming decades is projected to increase peak rainfall. This will increase the probability of flooding from the river and other sources and increase the chance of failure of existing and proposed drainage systems and flood defenses (according to the government's Department for Environment and Rural Affairs (DEFRA) reporting results of the *Lewes Integrated Urban Drainage Pilot Study June 2008*)
4. **Increased flood risk:** Paving over and building on the Malling Brooks wetland which currently acts like a sponge to absorb fluctuating ground water levels will create a new surface water problem. It could also cause a new artesian threat to existing and future buildings, whereby trapped and pressurized water would be pushed out of drains, gullies and ditches at a fast rate.
5. **Developer's flood risk assessment is inadequate:** Lewes is about to produce a Strategic Flood Risk Assessment (SFRA) which will cover the whole district and not just this site. This will give a context for individual planning applications. Because the SFRA is not ready yet, the onus is on the developer to produce their own Flood Risk

Assessment which, by its very nature, is inadequate because the entire drainage system of the development site and the surrounding area is interconnected.

6. **Developer's flood risk assessment is flawed:** The developer's Flood Risk Assessment was prepared by someone whose only professional qualification is an HNC in construction and was prepared from a desktop study. This directly contravenes government guidelines which state that flood risk appraisals should be 'undertaken under the supervision of an experienced flood risk management specialist' (PPS25). Much research has recently been undertaken into the behaviour of water in chalk topography and this has not been taken into consideration when preparing this flood risk assessment.
7. **Development on this site is not needed** – there are empty industrial units in the vicinity and on the North Street site. In addition, the original application was made in order to relocate light industrial units from North Street to Malling Brooks. Both sites are owned by Charles Style, who has recently announced he is not going ahead with the main development. Thus the original purpose of this planning application is no longer valid.
8. **Evacuation and flood mitigation plans** for the site are not convincing. Lives and livelihoods would be endangered by the development.
9. **National Park status should support an alternative development of the site as a community amenity** which would preserve its flood amelioration role whilst providing a green lung in the centre of the industrial estate. A new vision of The Brooks as a nature reserve would be a better use of the site.
10. **We should have the courage to make 'brave land use' decisions as recommended by DEFRA** : planning authorities should 'reinstate the floodplain and start to provide 'green corridors' for surface water drainage. This is in order to manage, in a sustainable manner, the increase in flood risk envisaged in the DEFRA's climate change sensitivity assessment.' (*Lewes Integrated Urban Drainage Pilot Study June 2008*)

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