



Mr S Davis
Planning Officer
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

13 February 2025

Dear Mr Davis

Application AL/137/24/RES – Land to the rear of Meadow Way, Westergate – Additional submission regarding surface drainage.

In reference to the above reserved matters application, Aldingbourne Parish Council submitted an objection to this 20.01.25 but reserved the right to respond further once missing information on a referenced drainage statement was uploaded to the ADC planning portal. We therefore would make the following comments on this aspect of this application:-

Aldingbourne Parish Council is disappointed to note the November 2024 91 page "Drainage Statement" was not provided by the applicants' agent until 16 January 2025 (appearing on the Arun District Council planning portal on 21 January).

The "Statement" prepared by CTP is very largely a re-submission of the statement prepared by Motion in 2022 and relied on in support of the original application for outline permission and subsequent Appeal.

The limited new material addresses concerns expressed by WSCC but not those of Aldingbourne Parish Council and in particular does not address the failure to comply with ANP policies EH1 (vi) and EH5 (a) - increased risk of groundwater/surface water flooding.

ANP policy EH5 (a) refers to *"additional risk of flooding either to the development site or other land, arising from the carrying out or use of the development/" (our emphasis).*

The 2022 Drainage Statement (as now re-submitted) used data from borehole tests in the summer of 2022 (an unusually dry period) yet still showing groundwater levels so high as to require the inclusion in the proposal of attenuation ponds and raised levels within the development. Subsequent borehole data in 2023 and 2024 has shown, as would be expected, substantially higher groundwater levels since 2022.

The run-off from the groundwater into the existing open ditch will be substantially increased by surface water from the developed site including the discharge from the attenuation ponds. The proposal necessitates a culvert under the site access road where it crosses the ditch. This does not comply with WSCC policy not to culvert existing open water courses - especially one that will include the additional site surface water.

While CTP refer in the new material within the Statement to having "mapped" the existing ditch there does not appear to be any data as to the overall capacity of the existing ditch, or the ability of the existing ditch to cope with the increased volumes of groundwater and surface water run-off. This is surely critical to the viability of the proposal to discharge into the existing ditch. Whatever the expected volumes prove to be, there will be substantially greater volumes in the ditch than today as a Greenfield site. This inevitably increases the risk of surface water flooding at the new culvert under the access road.

The ditch then flows under the A29 towards the Rife drainage system to the east and south. Here there is an unquestionable increase in the risk of flooding in an area that EA designate as "High Risk of Flooding from Surface Water".

Aldingbourne Parish Council submit the latest Drainage Statement and plans marked "for approval" do not comply with ANP policy EH5.

As noted, the borehole data from 2023 and 2024 indicate site groundwater at higher levels than the 2022 data used in the outline planning application and subsequent Appeal.

Aldingbourne Parish Council submit that the applicant in this re-submission has not provided clear evidence to demonstrate the proposed site drainage and SUDS are adequate for the normal ground levels recorded in 2023 and 2024 rather than the unusually dry period in 2022. The current data not that used in 2022 should be the basis for the analysis of this Reserved Matter.

Yours sincerely

Marie Singleton
Parish Clerk /RFO