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From: Roger Spencer <Roger.Spencer@arun.gov.uk>
Sent: 01 September 2021 09:22
To: Brenda Louisy-Johnson <Brenda.Louisy-Johnson@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: AL/87/21/PL - Oldlands Farm - external advice on land drainage

Dear Brenda,

As you are aware, with the aim of achieving the target set out in the Planning Performance Agreement for this site and overcome our (Engineering) resourcing issues, we externalised the drainage consultation process to independent consultants, Herrington Consulting Ltd.

Herringtons have provided 'Technical Note: Planning Review of Oldlands Farm, Bognor Regis', dated 27 July and this has been uploaded to the Planning system (28/7/2021) with the Description "Drainage comments from external drainage consultee Herrington.

The Herrington Note should be considered in full but I would summarise as follows.

- Whilst the principle of the outline for the development was approved (AL/58/15/OUT), there remains uncertainty regarding the technical information provided and this could have an impact on the deliverability of the scheme
- As the site lies partly in the functional floodplain, evidence should be supplied to support the appropriateness of the development with Flood Zone 3b
- More certainty is required regarding the infilling of existing ditches – not limited to volume but also habitat impacts. *It should be noted that some of this aspect is being addressed by way of the Watercourse Consenting process but Planning and Consenting do not automatically apply one to the other.*
- Recommendation of comparisons be made of pre- and post- (with mitigation) numerical modelling – this should take into account proposed culverting, the service road and the culverts beneath it
- Recommendation for further (updated) consultation with Network Rail – previous proposals did not show a ditch in close proximity and parallel to the railway embankment
- Confirmation of correct modelling values
- It was noted that greenfield runoff rates exceed rates for the 1 in 1 year return period
- Confirmation required that Qbar has been used for volume control considerations
- Lack of hydraulic locking (tide locking) results (a conflict of assumption <> observation was noted in the application)
- The application (FRA) incorrectly states that the LLFA (West Sussex County Council) has a responsibility for maintaining the ditches – requires amendment

In conclusion the Herrington Note recommends the LPA / LLFA requests additional information to ensure the drainage and flood risk mitigation measures will be viable at the detailed design stage.

Reference the 3rd BP above, the application mentions that the applicant is waiting to hear from us (Engineers); We responded in May '21 and suggested a site visit to discuss the issues. I am not aware that this suggestion has been acted upon.

We would also say that there is a lack of clarity in the some of the drawn information – this may be due to the scanning process or the way the applicant has supplied the information but it makes it difficult to assess the detail on the drawings.

In light of the above information from the independent consultant, I am at this stage unable to recommend that the drainage details are at a sufficiently developed stage to provide sufficient confidence that the application should go forward. We are, of course, open to further discussion and engagement with the Applicant's consultants to address the outstanding points listed and any issues arising. This may or may not involve further engagement of Herringtons but I would suggest it should.

Regards,

Roger Spencer
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