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Save the environment - think before you print.

From: Daun Johnson <Daun.Johnson@arun.gov.uk>

Sent: 25 August 2020 07:09

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: FW: A/110/20/RES LandSouth of Water Lane Angmering Approval of reserved matters following A/99/17/OUT for the Bridge over the Black Ditch providing access to the approved development.

rep

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From: Geoff Gibbs

Sent: 24 August 2020 18:11

To: Planning <Planning@arun.gov.uk>; Michael Eastham <Michael.Eastham@arun.gov.uk>

Subject: A/110/20/RES LandSouth of Water Lane Angmering Approval of reserved matters following A/99/17/OUT for the Bridge over the Black Ditch providing access to the approved development.

A/110/20/RES

Land South of Water Lane Angmering

Approval of reserved matters following A/99/17/OUT for the Bridge over the Black Ditch providing access to the approved development. This application may affect the setting of listed buildings, may affect the character & appearance of the Angmering Conservation Area & falls within Strategic Site SD9, CIL Zone 1 (Zero Rated).

I have become aware of Planning Applications A/109/20/RES and A/110/20/RES. I am writing this same objection to both Applications because they both fail to meet the opportunity of reducing flood risk overall.

The two Applications have failed satisfy NPPF guidance in the following respect:-

'What are the opportunities for reducing flood risk overall?

Local authorities and developers should seek opportunities to reduce the overall level of flood risk in the area and beyond. This can be achieved, for instance, through the layout and form of development, including green infrastructure and the appropriate application of sustainable drainage systems, through safeguarding land for flood risk management, or where appropriate, through designing off-site works required to protect and support development in ways that benefit the area more generally.'

For this reason, I believe that you should refuse both submitted Applications.

My concern may well be timely because Arun District Council's drainage engineer has commented as follows in Application A/110/110:-

'We understand from discussions with WSCC LLFA and the Environment Agency that a re-evaluation is being undertaken to establish if this crossing should be a culvert rather than a bridge in order to restrict flow and provide flood alleviation to the village downstream. We therefore do not recommend this application is approved at this time as proposals may fundamentally change.'

With regard to A/110/20/RES, Angmering parish Council, at their Planning Committee on 11th August decided to:-

'Send email to Michael Eastham to say that we are unable to comment as there is insufficient information, an extension of time is requested.'

I concur with that request.

I also believe that there should be an extension of time for A/109/20/RES since it relates to the same site and the drainage approach therein does not achieve the aim of contributing to a reduction in flood risk overall.

I objected to Application A/99/17/OUT, which covered the same site mainly on drainage and flood risk grounds.

In response to the Outline Application, the Environment Agency planning specialist made the following observation referring to wider flooding impacts off the site:-

'Advice to the LPA/Applicant

Other than the above observations, the main issues on the site relates to surface water run-off. The acceptability of the proposal will be determined by the Lead Local Flood Authority (LLFA). We note that initial comments have been made by the LLFA Drainage Engineer, where matters relating to greenfield run off, infiltration containment within

the site, SUDS design, infiltration testing etc have been highlighted, and that further detailed investigation is required.

The community of Angmering, downstream of this development is at risk of flooding from the Black Ditch. A significant contributor to flood flows is runoff from this site. A well designed SUDS scheme that significantly reduces runoff rates to the Black Ditch provides the opportunity to help reduce runoff to the Black Ditch and reduce flooding to the village.'

The second paragraph above is particularly pertinent. Firstly, it refers to the flooding problem downstream due to the inadequate conveyance capacity of the Black Ditch highway culvert. Secondly, it seems to me that if, instead of the clear span bridge proposed as part of Application A/110/20/RES, a highway embankment/dam carrying a road at the same level as the bridge deck is substituted, and the drainage calculations in A/109/20/RES are reworked to rely on attenuation online on the Black Ditch upstream of the highway embankment/dam, a more effective solution will be achieved delivering wider benefits and reducing flood risk overall.

The throttling control measure for Black Ditch flow through the dam would operate to ensure that critical water levels downstream are maintained below levels that would result in flooding. Such a system of operation is relatively easy to achieve.

This would greatly simplify the drainage attenuation requires elsewhere on the Application site since the real benefit will be achieved strategically.

It may also be appropriate to consider a more extensive scheme to also incorporate flood storage into the design of the A/280 / Water Lane roundabout financed by the proposed development north of Water Lane covered by A/40/18/OUT.

A/110/20/RES included a modelling report apparently produced in 2018 to demonstrate that the hydrological impact of the possible construction of a roundabout at the Water Lane / A280 junction would be acceptable in flood risk terms. I have assumed that this roundabout is relevant to these Applications because the Angmering North developments (North and South of Water Lane) will substantially fund these highway works.

The modelling report contains recent useful flood modelling information downstream to the village square confirming the observations of local residents. It includes maps showing flood depths for various return periods including the impact of different amounts of climate change. Unfortunately, the report reproduced on Arun's website has poor definition, which makes it impossible to discern what the flood depths on the various maps are. **I request that this 'Modelling Report' is made available on your website or otherwise at the definition it was already produced so that it can be readily understood.**

The 'Technical Note' dated 23/07/2020 in A/110/20/RES referenced this earlier 'Modelling Report'. As I understand, Stantec, have, in 2020, re-run the earlier model of 2018 to demonstrate that a clear span bridge to the Water Lane South site would have adequate freeboard over future flood levels and that flooding would not be affected by the presence of the bridge.

I append some record photographs showing local flooding.

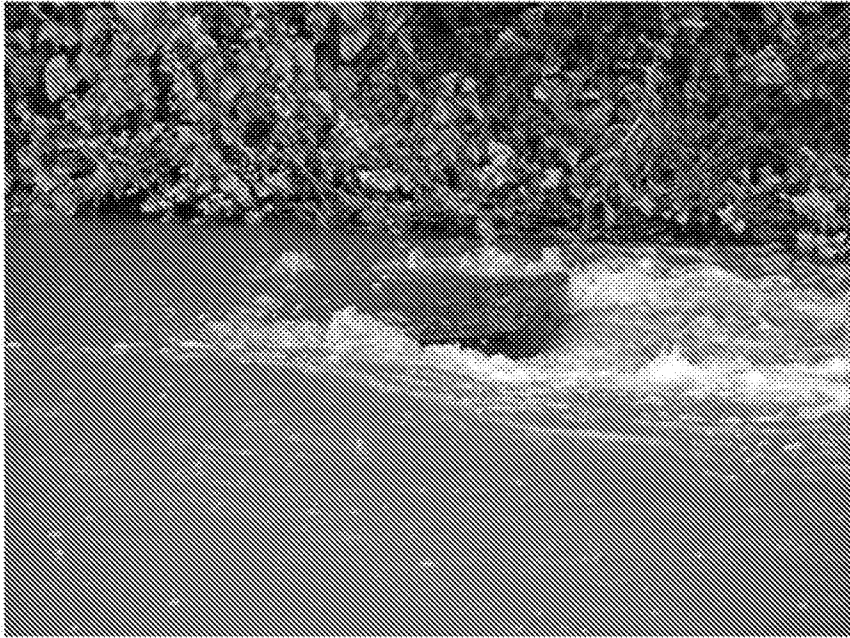
This photograph below shows residential area flooding from the Black Ditch downstream of the development site.



This photograph below shows water flowing off the area to the east on to the northern part of Weavers Hill



The photograph below shows water escaping from a manhole on the inadequate highway culvert through which the Black Ditch flows downstream of the development site.



This photograph below shows the upper part of the Black Ditch within the development site.



I send this representation as an e-mail because I have been unable to do so through your system.

Geoff Gibbs

45 Chantryfield Road

ANGMERING

24 August 2020