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From: Michael Eastham <Michael.Eastham@arun.gov.uk>
Sent: 30 September 2020 12:47
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: A/109/20/RES and A/110/20/RES

Please upload onto Ocella the email below and the attachment which comprise a further consultation response from **Angmering Parish Council** to reserved matters applications **A/109/20/RES** and **A/110/20/RES** relating to Land South of Water Lane, Angmering.

Thanks,

Michael

Michael Eastham
Principal Planning Officer,
Planning Department

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From: Katie Herr [REDACTED]
Sent: 30 September 2020 11:55
To: Michael Eastham <Michael.Eastham@arun.gov.uk>
[REDACTED]

Subject: A/109/20/RES and A/110/20/RES

Hi Michael,

Please see the below representation and attached information.

Please add both documents to the above applications on the portal.

We would welcome any feedback.

Kind Regards

Katie

Failure to meet Arun Local Plan Policy W DM2 Flood Risk

Following your engineer Laura Gibbon's response to B/DWH dated 22 September 2020, Angmering Parish Council would like to add to their representations.

APC have continually raised concerns about the risk of flooding from development north and south of Water Lane and support Arun Engineer's suggestion (A/109/20/RES) to explore a culverted embankment option as part of the wider Angmering Flood Alleviation Scheme (FAS).

We would expect the replacement of the proposed bridge by a culverted embankment to require the submission of new hydraulic modelling data and a Flood Risk Analysis (FRA). However, since this has not been decided yet, we wanted to make our position perfectly clear on what we believe to be serious deficiencies in the hydraulic modelling data used for the bridge (A/109/20/RES), roundabout (A/110/20/RES) and the A/99/17/OUT FRA.

It is our view that neither application provides convincing evidence that flood risk to others will not be increased.

A/109/20/RES and A/110/20/RES not only split the development site covered by A/99/17/OUT in two, but do not share the same underlying hydraulic modelling data. This is despite the fact that fluvial and surface water behaviour across the entire site is interlinked, and the impact of the encroachment of a roundabout and bridge onto the Black Ditch catchment (floodplain) will ultimately dictate the overall site layout and drainage strategy.

- **A/109/20/RES** site layout and drainage strategy is based on the A/99/17/OUT FRA, which used old EA 2010 hydraulic modelling results and EA Product 4 Historic Flood Data, which comes with the following caveat: *“Please note that our records are not comprehensive. We would therefore advise that you make further enquiries locally with specific reference to flooding at this location.*

Currently the Environment Agency can only supply flood risk data relating to the chance of flooding from rivers or the sea. However you should be aware that in recent years, there has been an increase in flood damage caused by surface water flooding or drainage systems that have been overwhelmed.”

- **A/110/20/RES:** Edenvale Young Associates (EVA) Modelling Report is competent in its execution as far as it goes, but Appendix A Hydrology (Technical Note) regards historic local flood data as *“not relevant to this study”*, so it appears no attempt was made to identify information from observed historic flood events to calibrate the model or do a “reality check” on predicted Climate Change levels.

The 2018 EVA modelling Technical Note was used to ‘prove’ no adverse effect from encroachment into the Black Ditch catchment from the roundabout, and then again in 2020 by Stantec to do the same for the bridge. It achieved its aims in both respects.

The Black Ditch catchment in the north of the site acts as a flood plain and is a key component in managing flood risk along the 2.6km watercourse covered by EVA and the EA Angmering Flood Alleviation Scheme (FAS). However, neither report believes it is important enough to validate its Climate Change predictions against the observed and well documented recent flooding events in Angmering in 2002 and 2012.

An EA requirement is that hydraulic modelling should be repeatable and that *“Calibration, verification and performance testing should be carried out to understand the model performance with observed flows, observed rainfall, and forecast rainfall”*. Regular winter water levels and recorded flood events show Angmering to be at risk from a 1 in 5 to 1 in 10 year flood event. This further highlights our concerns about the integrity of the FRA, which predicts the catchment has a 1000 year (0.1 Annual Exceedance Probability) of flood risk.

If real data for the catchment is available including date and timed photographs then it must be relevant, and according to the EA’s **“Requirements for completing computer river modelling for Flood Risk Assessments Guidance for Developers”**, the model should have been calibrated against these observed

events. Such local information exists, was made available to Arun, WSCC LFFA and the EA and is provided in the attached document.

The EA consultation response says *"the EA are satisfied that based on the flood modelling there will be no significant flood storage loss"*. However, there is no evidence that the EVA flood modelling has been calibrated to take into account the storage available when measured against the regularly observed normal winter water levels in the Black Ditch catchment. See Appendix C in the attached document.

Also, what impact does that "small flood storage loss" from the roundabout and bridge have on the catchment areas north and south of Water Lane, when the model is used to replicate the water levels observed following heavy rainfall on 5 March this year as it enters the Weavers Hill culvert? Photographic evidence of this event can be seen in the attached document and was sent to the WSCC LLFA.

For the reasons stated above, we believe the modelling data to be incomplete.

Kind Regards

Angmering Parish Council

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Angmering Parish Council

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