

From: Michael Eastham <Michael.Eastham@arun.gov.uk>

Sent: 01 October 2020 16:02

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

Subject: FW: A/110/20/RES Land South of Water Lane Angmering Ap/17/OUT for the Bridge over the Black Ditch providing access to the approved development.

Please upload onto Ocella the email below which is a further response from a local resident to **A/110/20/RES**.

Thanks,

Michael

Michael Eastham
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From: Geoff Gibbs [REDACTED]

Sent: 01 October 2020 15:55

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

Subject: Fwd: A/110/20/RES Land South of Water Lane Angmering Ap/17/OUT for the Bridge over the Black Ditch providing access to the approved development.

I made this supplementary representation on A/110/20/RES some days ago after further information became available. It has not appeared on your website so far and I would be pleased if this would happen.

Separately there has been correspondence about the legibility of the modelling report and now it has been established that there is a colour copy can this version of the report be put on your website also.

Thanks

Geoff Gibbs

----- Forwarded message -----

From: **Geoff Gibbs**

Date: Fri, 25 Sep 2020 at 11:41

Subject: RE: A/110/20/RES Land South of Water Lane Angmering Ap/17/OUT for the Bridge over the Black Ditch providing access to the approved development.

To: Michael Eastham <michael.eastham@arun.gov.uk>, Planning <planning@arun.gov.uk>

With regard to Planning Application A/110/20/RES further information and correspondence has become available since I submitted my representation.

This is one of two Reserved Matters Applications submitted recently for this site following A/99/17/OUT and I have already made a further representation on A/109/20/RES. Neither the outline application, nor the two reserved matters applications, have satisfied 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.'

However, the consultation responses from your Council's drainage engineer and the Environment Agency have given me some hope that the aim to reduce flood risk overall can be achieved by constructing this access road which might otherwise be carried by the bridge covered by this application on a embankment through which Black Ditch flows are actively (rather than passively) controlled.

Your Council's drainage engineer said:-

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.

The Environment Agency said:-

Advice to Local Planning Authority / Applicant

The Environment Agency are presently part of ongoing discussions with Barnett David Wilson, Stantec, West Sussex County Council and Arun District Council with a view to replacing the bridge option with a box culvert, for the purpose of providing additional flood storage, as part of a local Flood Alleviation scheme for the village of Angmering.

This box culvert option will require an additional/revised Flood Risk Assessment (FRA) to demonstrate that:

- a) the additional storage is available,
- b) third parties shall not be affected by increased flood risk and
- c) whether this option could compromise the SUDS scheme in particular, the point of discharge location.

The FRA would have to be submitted by WSCC as part of the existing planning application, and will be submitted as an addendum to the said application.

Environment Agency
Guttsbourne House Chelworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/government/organisations/environment-agency

I am unclear who would promote the 'box culvert' option mentioned in the Environment Agency response. I say this because the Environment Agency response says, with regard to the box culvert:-

The FRA would have to be submitted by WSCC as part of the existing planning application, and will be submitted as an addendum to the said application.

I find this confusing because there is already an 'Applicant' for works on the site and, the Environment Agency, not WSCC as the Lead Local Flood Authority, has Powers on a Main Rivers, which is what the Black Ditch is at this location.

Clarity as to what may be going to happen in this regard is important to the public. An option that significantly manages flood risk downstream of this site must be taken seriously.

It is worth remembering that, in their response to A/99/17/OUT, the Environment Agency said, as 'Advice to LPA / Applicant':-

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 Environment Agency clearly recognised and understood, at that stage, the problems that Angmering faces, and the flood risk reduction opportunities this development offered.

In recent correspondence on A/109/20/RES, (this same site), the Applicant's agent has stated:-

'For clarification the Flood Risk Assessment (FRA) was approved at outline planning in its entirety. The FRA included a drainage strategy drawing, Sth-301-001 A, as well as a whole chapter on surface water drainage.'

Yesterday I checked your Decision on A/99/20/OUT and now provide a snip of it below. I read this as stating that flood risk and surface water management is a Reserved Matter that the Applicant must satisfy at this stage. As I see it nothing involving flood risk or drainage was *'approved at outline stage in its entirety.'*

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No development approved by this planning permission shall take place until such time as a detailed Flood Risk Assessment and surface water drainage strategy has been submitted to, and approved in writing by the local planning authority. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme.

Reason: According to the Environment Agency Flood Map for Planning, the proposed development is almost entirely within Flood Zone 1, apart from the most northerly part of the site where a very small section lies within Flood Zone 3, in accordance with Policy D DM1 and Policy W DM2 of the Arun Local Plan.

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 still concur with that request and 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 repeat that your Council’s own drainage engineer has said this in her comment:-

‘We therefore do not recommend this application is approved at this time as proposals may fundamentally change.’

Please do not determine this Application until an alternative, that could offer a real benefit to Angmering, is properly evaluated.

Finally, I am still waiting to be able to view a readable copy of the EdenvaleYoung modelling report of 2008 for Water Lane, Angmering. Please can I see one?

Geoff Gibbs

45 Chantryfield Road

ANGMERING

25 September 2020