

[REDACTED]

From: Amanda Scholes on behalf of Planning.Responses
Sent: 28 September 2018 10:01
To: Planning Scanning
Subject: FW: A/114/18/PL

From: Anita Gardner
Sent: 28 September 2018 09:08
To: Planning.Responses
Subject: FW: A/114/18/PL

[REDACTED]

Anita Gardner | Principal Planner, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

[REDACTED]

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From: Geoff Gibbs [mailto:geoff.m.gibbs@gmail.com]
Sent: 27 September 2018 08:04
To: Planning; Anita Gardner
Subject: A/114/18/PL

Application A/114/18

I **object** to this planning application on a number of grounds. I am sending this by e mail since I have been unable to make the objection on your system.

1 Piecemeal nature of proposal This appears to be another application for part of the site covered by the application A/27/16 substituting what appears to be a materially different and denser development of part of the area covered by A/27/16. I believe that surface water drainage remains to be resolved for A/27/16. Because of this and a range of other unresolved matters the impact of the development of the whole area covered by A/27/16 must be considered in its entirety and not in a piecemeal way. For this reason I **object** to Application A/114/18.

2 Transport impacts This application would appear to generate vehicle and other movements associated with staff, visitors and deliveries on inadequate roads, including narrow housing estate roads that struggles to cope with current traffic. The information provided is misleading in that the local bus does not operate a Sunday and on other days, the last bus, eastbound to travel beyond Worthing is at about 5 pm and the last bus westbound is at about 6 pm. Because of both the adverse impact that additional vehicle movements will have on the community and the limited period of bus operation (for visitors and staff) I **object** to Application A/114/18.

3 Increased risk of flooding to others from site runoff In this regard I **object** to this application A/114/18 on similar grounds to my objection to A/27/16. In my objection to A/27/16 I made it clear then that because of the quite dreadful flooding that Angmering has experienced in the past and most recently in 2002 and 2012 there must be no further inappropriate development of the Black Ditch catchment both in Angmering and upstream of Angmering.

BS 8533:2011 'Assessing and managing flood risk in development – Code of practice' and various Planning and Construction Guidance documents (including NPPF) make it clear that new development should especially **not** increase flood risk to others. Specifically BS8533 states "There should be no increase in the risk of flooding as a result of the proposed development."

I mentioned above two particular flooding events. In March 2002 water running off the proposed development site (along with surface water from elsewhere) flowed along Water Lane and Station Road to enter the Black Ditch at the rear of the village hall flooding a number of properties on the way. I attach at the end of this objection a first photograph I took at the time from the highway at the corner of the proposed development site looking towards the village centre in 2002. In June 2012, in another flooding event, the inadequate conveyance capacity of the culverted watercourse under Water Lane became clear by surface water emerging from a culvert manhole in the road. This water, along with other surface water runoff again flowed along the road to re-enter the Black Ditch at the rear of the village hall again flooding a number of properties on the way. I attach a second photograph I took of this in 2012 looking towards the proposed development site. I am surprised that in the submitted documentation there is no mention of the 2002 and 2012 flooding events while other Angmering flooding events are mentioned.

I understand the Applicant proposes to manage runoff from the developed site by onsite infiltration. In my view if, in particularly wet conditions, surface water runs off sites in this area then, if the existing site is yet further developed beyond the A/27/16 proposals there will be even less opportunity for the water to soak into the ground. This suggests to me that runoff from the site will then be more frequent and of a greater magnitude for a given rainfall event. If water leaves the proposed development site it will have difficulty entering the Black Ditch as the 2002 picture shows and further, because of the inadequate conveyance capacity of the Black Ditch culvert, increased flows in the culvert will mean increasing amounts of floodwater escaping from the manhole as happened in my 2012 picture with resultant property flooding to others.

It would appear that development of the entire A/27/16 site is now being pursued as two separate entities and I, and others, find this confusing. As outlined in 1 above the totality of the proposals for the entire site needs to be explained including the cumulative risk implications for others.

I have endeavoured to study local flooding issues but find what is being proposed difficult to follow.

Application A/27/16 included a document named '*site investigation report*' while the current Application A/114/18 contains a document named '*ground investigation*'. As far as I can see these are the same document of over 200 pages dated 2015 and because of this I will repeat what the document '*Ground investigation*' in A/114/18 particularly says:-

'SOAKAWAY TESTING

Soakaway testing was carried out in the Head strata encountered at the site. The tests were undertaken within a standpipe installation in BH2 to provide indicative infiltration results broadly following the principals of BRE Digest 365 'Soakaway Design'. Testing was not undertaken in BH3 as this standpipe was flooded at the time of our visit.

The infiltration results ranged between 4.0×10^{-3} m/s and 6.6×10^{-3} m/s.'

It then says:-

'SOAKAWAY TESTING

Soakaway tests provided indicative infiltration results between 4.0×10^{-3} m/s and 6.6×10^{-3} m/s. The ground conditions at the site however include a chaotic mix of granular soils with varying amounts of clay and clay soils, which are likely to be effectively impermeable. It is therefore recommended that supplementary tests are undertaken in machine excavated trial pits in order to more accurately determine the capability of the soils to dispose of storm water using ground infiltration systems.

The Environment Agency does not approve soakaways in contaminated ground. The elevated results for PAHs and lead at this site are within Made Ground soils at shallow depths and should not be allowed to directly infiltrate into soakaways in contact with the aquifer beneath.

Consideration will however be necessary to shallow groundwater entries, particularly in the southern parts of the site, and to avoid promoting slope instability if such a drainage solution is sought. In this respect, we recommend shallow soakaways up slope or near buildings should be avoided.

Groundwater entries and and more cohesive soils may prevent the effective use of soakaways at depth.'

I have seen no evidence of 'machine excavated pits' or 'supplementary tests' mentioned being undertaken despite a considerable period elapsing since the 'ground investigation' report of A/114/18 was drafted in 2015.

The Decision notice for A/27/16 additionally states:-

'Winter groundwater monitoring to establish highest annual groundwater levels and Percolation testing to BRE 365' or similar approved, will be required to support the design of any Infiltration drainage.'

I have also seen no evidence of this happening to date.

Thus it is clear that the essential investigative work necessary to demonstrate that the infiltration proposed will not result in an increase in flood risk to others has not been undertaken.

Drainage Engineers realise there is a hierarchical requirement for dealing with surface water with infiltration as the first choice. Thus the document 'SURFACE AND FOUL DRAINAGE STRATEGY 3834/01 REVB' for A/114/18 is worrying. It is a drawing and in an area where infiltration may be proposed it has the note:-

'Should infiltration not be feasible, details of existing ditch to be further assessed to confirm feasibility of a connection. Connectivity subject to approvals by LLFA and relevant drainage board.'

A statement such as this seems premature since it appears that insufficient work has been undertaken so far to demonstrate the efficacy or otherwise of infiltration. Should discharge to the 'existing ditch' (which ultimately flows into the Black Ditch upstream of the culvert), be considered it will be necessary to provide attenuation storage on site to limit the discharge to greenfield rates and it has not be indicated where such storage will be located.

I drafted the above in the absence of the document described as 'surface water drainage strategy' dated 23/08/2018 on your website index. I assume the document 'Surface Water Drainage Strategy and Phase 1 Flood Risk Assessment' dated 20th September 2018 is this missing document.

Further documents were then published on your website on 21/09/2018 described as 'ENGINEERS COMMENTS (DRAINAGE)' and 'WSCC FLOOD RISK MANAGEMENT TEAM'.

The remaining part of my item 3 of this objection takes account of these last three documents.

The document 'Surface Water Drainage Strategy and Phase 1 Flood Risk Assessment' reproduces part of the 'Ground investigation' of A/114/18.

The document 'Surface Water Drainage Strategy and Phase 1 Flood Risk Assessment' merits a detailed commentary in my opinion:-

Page 4

This states that the groundwater table depth is 2.5 metres below ground level. I believe there is insufficient evidence to confirm this and, indeed, elsewhere it is stated that a standpipe was flooded at the time indicating a

water table at ground level. Surely the groundwater table depth must be determined using a technique including monitoring over an extended period as required by your Council's own drainage engineering staff.

Again there is a statement:-

'In absence of infiltration discharges to the ditch bounding the site.' To consider discharge to a water body it is necessary to demonstrate that infiltration is not feasible. This has not been done. It must be demonstrated that such discharge does not increase flood risk to others. This would require onsite attenuation to restrict offsite discharge to greenfield rates.

I do not understand why the stated predevelopment flow rates for the 30 and 100 year events are so similar.

Page 10

Paras 4.15 and 4.20 refer to flooding in *'1980, and again in 1981'*. The most serious recent flooding has been on 2002 and 2012 and considerable evidence of this exists and my two photographs illustrate these recent floods.

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Para 4.28 states that the groundwater risk of flooding to the site is moderate and from this it can be deduced that the groundwater risk of flooding from this site to others once developed must be of concern to others.

Page 17

Paras 5.3 to 5.5 again discuss the results of the limited infiltration investigation undertaken. The infiltration rates obtained using the testing that did not follow the BRE 365 standard are here replaced with a *'more conservative rate'* but no evidence to support the selection of this rate this is provided. Surely the infiltration rates must be determined using an approved investigation technique including monitoring over an extended period as required by your Council's own drainage engineering staff.

Para 5.5 confirms this. I believe all of this needs to be undertaken prior to determination of the application.

Para 5.6 again worryingly mentions the possibility of runoff discharge into a *'local watercourse'*.

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Para 7.1 confirms that *'.....adequate measures are required ...to ensure that surface water is dealt with at source and the flood risk on/off site is not increased...'* I see no evidence of this at this stage.

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Para 8.6 of Conclusions states:-

'It is necessary to confirm the infiltration rates to BRE 365 'Soakaway Testing' standard prior to the detailed design phase and the proposed drainage strategy presented herein reassessed thereafter. Should infiltration prove to be unfeasible for the proposed site, it is recommended that runoff form [sic] [likely to be 'from'] the site be discharged into a local watercourse bounding the site to the south. The discharge rates into the ditch should not exceed greenfield runoff rates, if feasible.' Clearly proper infiltration investigation must be undertaken and every effort made to establish an infiltration arrangement that will work. Should that not be possible any other arrangement must **not** increase flood risk to others.

Arun Council's own drainage engineers have commented upon this application in the document *'ENGINEERS COMMENTS (DRAINAGE)'*.

This includes eminently sensible requirements of the hierarchical list of destinations for surface water runoff.

It also requires that the investigative work should be undertaken in accordance with BRE 365, CIRIA R156 or similar approved method and that there should be adequate winter groundwater monitoring to determine the highest winter ground water table.

None of this yet seems to have happened.

West Sussex County Council has commented upon this application in the document '*WSCC FLOOD RISK MANAGEMENT TEAM*'

It recommends that the application is reviewed is reviewed by the Arun District Council Drainage Engineer.

It then says:-

'Development should not commence until finalised detailed surface water drainage designs for the site, based on sustainable drainage principles, for the development have been submitted to and approved in writing by the Local Planning Authority.'

I was disappointed that they did not object to this application. Had I professionally reviewed this application on this matter I would have objected on the basis that the supplied information was inadequate to determine the matter. Flood risk to others is such a serious matter that it should not be left to condition.

Summary of item 3.

I **object** to the application on the grounds that it has not been demonstrated that the development will not increase flood risk to others. I believe this matter is so serious it should not be left to condition and the application should be refused if it is not demonstrated that flood risk to others will not increase flood risk to others.

4 Increased risk of foul sewage flooding to others While this is a matter for Southern Water to comment upon I have seen foul sewage emerging from a manhole on the sewer system in Water Lane to the west of this site to which I assume the foul sewage from this site will drain. If this new development is connected to the existing foul sewerage system without improvements to the system this is likely to become worse. The final photograph shows sewage escaping from the manhole in May 2018. I **object** to the application unless measures are implemented to prevent any increase in foul sewage flooding.

Please consider this objection seriously. I have known the area for some years and take highway, drainage, wastewater and flooding issues seriously.

G Gibbs
45 Chantryfield Road
ANGMERING

September 2018



