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From: Geoff Gibbs [REDACTED]
Sent: 17 October 2019 13:29
To: Michael Eastham <Michael.Eastham@arun.gov.uk>; Planning <Planning@arun.gov.uk>
Cc: Angmering Parish Council [REDACTED]
Subject: A/122/19

I **object** to the above Planning Application as follows:-

General

I have previously responded to a number of Arun consultations on general planning matters, your Plan making process and an earlier Application for this site (A/36/18/OUT). In all of those I have made it clear that because of the quite dreadful flooding that Angmering has experienced in the past and most recently in 2002 and 2012 there should be no further inappropriate development of the Black Ditch catchment within the parish of Angmering. Additionally, my reading of local opinion has been there is no particular enthusiasm for further residential development within and on the edge of the developed part of Angmering.

I believe that a recent carried Motion at a full Arun District Council meeting sought a moratorium, pending advice from Government, on new development below the level of the raised beaches from inter glacial periods of the Pleistocene era. If this development is below the level of these raised beaches, I believe you should adopt a precautionary approach and not determine this Application until guidance from Government is forthcoming.

Your Council refused A/36/18/OUT for understandable reasons but I am unable to reproduce those reasons here today (17 October 2019) because the Decision Notice for A/36/18/OUT is not visible on your website. You must similarly refuse this Planning application.

Non-compliance with the 'Made' Neighbourhood Plan

The 'made' Neighbourhood Plan for Angmering shows the site as being outside the built up area boundary. At referendum, the community overwhelmingly endorsed the Neighbourhood Plan and, if you approve this Application, you will effectively disregard the Neighbourhood Plan.

Loss of local Employment

There is a certain amount of varied local employment on this site, which is likely to be lost and the commercial development proposed may not appropriately compensate for this. The proposal for 557 square metres of commercial development is trivial (less than one twentieth of a hectare), may not be commercially worthwhile and may be inappropriate within proposed residential development. Angmering needs more, not less, local employment rather than further houses from which, those who need to work, will likely need to commute out of Angmering to find it.

Primary Education

The community expected a new secular primary school along with the Bramley Green development and, indeed, I understand developer funding was provided and a site allocated by the Bramley Green development but no school has been forthcoming. There has been significant development east of Roundstone Lane since Bramley Green was completed and further planning approvals granted elsewhere in Angmering. A new, two or three-form entry, secular primary school must be opened before any further residential development is permitted in Angmering. To the public what happens to developer contributions for a new school, sports facilities and highway improvements is something of a mystery.

Flood Risk

The site is Flood Zone 1 and, having analysed the infiltration test results, I believe the concerns will be surface water and groundwater resulting in potential increased flood risk to others.

I have not seen the Application Form for this Application because it has not been on your website and it is still not there today (17 October 2019). Instead, there is an Application Form for a site in Level Mare Lane, Fontwell. It is fundamental that interested people are able to examine the Application Form. If, as for A/36/18/OUT, the Application Form answers 'no' to the question 'Will the proposal increase flood risk elsewhere?' I believe the Flood Risk Assessment (FRA) contains insufficient evidence to support that answer.

BS 8533:2011 'Assessing and managing flood risk in development – Code of practice' and the National Planning Policy Framework NPPF along with Building Regulations make it clear that new development should especially **not** increase flood risk to others and, where possible, should reduce flood risk overall. Specifically BS8533 says that *"There should be no increase in the risk of flooding as a result of the proposed development"* and *"Where practicable, the risk of surface water flooding to surrounding areas should be reduced."* From my reading of the submitted FRA I see no guarantee that flood risk to others will **not** increase.

The Flood Risk Assessment (FRA) seems very similar to that provided for A/36/18/OUT and I have been unable to find any investigation results other than those submitted for that earlier Application.

The Flood Risk Assessment (FRA) states that *'Generally the site is considered to be at a low risk from all sources of flooding and will not increase the risk of flooding elsewhere as a result of development of the site.'*

The FRA states that infiltration testing undertaken across the site showed that *'infiltration rates were not favourable'*. The infiltration tests were at discrete locations using test pits. It is not surprising to me, given the topography and geology, that the encountered groundwater levels and infiltration rates should be what they were. Based on this the FRA proposes discharge to a watercourse via an attenuation basin. Much guidance, including the NPPF, requires the hierarchical approach to surface drainage and I believe infiltration has been prematurely rejected without adequate investigation. Specifically I consider the FRA is inadequate in that it does not investigate more diffuse and widespread infiltration to replicate what happens currently to reduce the likelihood of increasing flood risk to others.

In fact the FRA says *'The Environment Agency have recommended consideration must be given to any discharge to the watercourse. The floodplain downstream of the site is described as being 'on its limit' for accommodating increased drainage capacity.'*

A particular danger of urbanisation is the increased volume of runoff from a development site. While attenuation should limit the flow rate of runoff, managing total volumes is much more challenging. The Black Ditch catchment drains into the tidal river Arun through a flap valve and it is possible, with potential sea level rise, this may be the reason for the Environment Agency comment.

I would have expected the FRA to include the results of consultation with West Sussex County Council (WSCC) as Lead Local Flood Authority (LLFA) on local drainage matters but cannot find this

information. To date I have also not seen a consultation response from WSCC as LLFA, who are surely a statutory consultee, for this Application on the Arun planning website.

Your Council's own drainage engineer has indicated the need for further infiltration investigation and vital winter groundwater monitoring with which I concur. Your Council's drainage engineer expressed much the same opinion eighteen months earlier in respect of A/36/18/OUT but despite the time that has elapsed no further investigation appears to have been undertaken in the intervening period.

I thus **Object** to this Application based upon the inadequacy of the Flood Risk Assessment.

Highway Issues

I mention this because it is clear that up to another 160 dwellings and commercial development will impact adversely on the local highway network and its connections with the A27, A259 and A280. The proposed main vehicular access to the site is via the Arundel Road (B2225) at a point where the speed limit is 60 mph between At St Margaret's School and the B2225 / A27 (Hammerpot) junction. To the south traffic conditions become dangerous around St Margaret's Primary School twice a day on school days compounded by pedestrian movements and unsafely stopped vehicles. If you are minded to Approve this Application a signalised crossing outside St Margaret's School as the mitigation indicated in the WSCC response would be a significant local benefit.

Turning movements at the B2225 / A27 (Hammerpot) junction have been greatly restricted in recent years with both the right turn out of the B2225 and onto the B2225 prohibited. Problems locally are compounded by 'U' turning movements at junctions on the A259 and a 'U' turning facility at Poling to allow traffic from Angmering to access the east bound A27 from the Hammerpot junction via a lengthy route. WSCC also suggest, as mitigation, pedestrian improvements at the B2225 / A27 which, they say, should be agreed with Highways England.

Clearly, the development will generate additional road traffic, which will add congestion and danger to local roads. It is also likely that many of the new residents will need to travel daily away from Angmering, as is the case for many existing residents. We should realise that this proposal, like others locally, involves removing local jobs and providing even more houses. Because the A27 is part of the trunk road network, I consider it is a higher capacity east west route than the A259. Thus if you intend to permit this development it is essential that the B2225 / A27 (Hammerpot) junction is enhanced. Those from this development who wish to access the eastbound A27 are likely to use estate roads such as the one I live in rather than drive west to the Poling 'U' turning facility or south to the village centre to reach the Patching junction.

There would be local benefits in reinstating the prohibited traffic movements at the B2225 / A27 Hammerpot junction in a safe manner. Application A/99/17 is now proposing an unrestricted roundabout junction at the currently restricted Water Lane / A280 Angmering 'by pass' junction which demonstrates a clear precedent for new development providing highway junction enhancements. My preference is for a traffic signal controlled B2225 / A27 Hammerpot junction since this can safely incorporate the much-needed pedestrian crossing phases (meeting the suggestion of WSCC) thereby improving both pedestrian and road vehicle safety and convenience. In West Sussex there are precedents for signalised junctions on a high-speed dual carriageway parts of the A27 in that the trunk road authority has operated traffic light junctions at Shoreham Airport and Oving Crossroads for many years at the national speed limit. I would prefer that, in the vicinity of the Hammerpot junction, the A27 speed be reduced to a safe level below the current National speed limit because of the road's challenging geometry. Associated with this, I believe that the part of the B2225 to the south of the A27 that currently has the national speed limit should be reduced to a 30 mph limit.

Buses

The travel plan indicates buses operate here on Sundays and this is incorrect.

I am sending this as an e mail because I could not get you system to work for me.

Geoff Gibbs – Chartered Civil Engineer and Scientist

45 Chantryfield Road

ANGMERING