

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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From: Geoff Gibbs

Sent: 03 March 2022 18:14

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

Subject: A/188/21/DOC Land at Dappers Lane Angmering Littlehampton

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Approval of details reserved by condition imposed under ref A/76/20/PL relating to Condition Nos 17 - existing & proposed ground levels, 18 - surface water drainage, 19 - maintenance & management of surface water drainage, 21 - discharge flows to watercourses and 22 - foul drainage system

I again say that I know this is a Discharge of Conditions (DOC) application and that you do not invite representations from members of the public. I have already made a representation on this (my e mail of 14th November 2021) but feel it necessary to write again because of information that has become clearer to me from further documents very recently posted on your website.

I was pleased that your Engineer, in her e mail of 21st September 2021, did not recommend discharge of Conditions 18, 19 or 20, and I concurred with her further comments in her e mail of 27th October 2021. Conditions 18 and 19 both stated that 'Development shall not commence etc.' and I was therefore shocked that construction work on site commenced prior to these Conditions being discharged.

Returning to the original planning application, I made two carefully considered representations (dated 6th July 2020 and 12th October 2020) upon A/76/20/PL and you granted Conditional approval.

My main **objection** to the original Planning Application (A/76/20/PL) was that the Applicant had not demonstrated this development will not increase flood risk to others. I have always considered the flood risk impact of development proposals upon the existing community to be paramount. Of the various recent planning proposals in Angmering this is the one that could have the gravest impact upon the area around where I live.

National Planning Policy Framework at section 163 clearly states - '*When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.*' I believe the Applicant's original proposal did not demonstrate this and I do not believe the latest documents help in this regard..

Further, the technical guidance associated with the National Planning Policy Framework on flood risk and coastal change states at section 50 that '*Local authorities and developers should seek opportunities to reduce the overall level of flood risk in the area and beyond*'. Again, I believe the Applicant's proposal did not demonstrate this.

After submitting my initial representation to A/76/20/PL I had a useful Zoom conference with the Arun Planning Officer and Engineering staff and gathered that it then seemed that the primary way to convey surface water off site will be by constructing a further '**new pipeline**' from the site in a westerly direction (north of the existing culverted watercourse). I am unclear what the status of this new pipeline will be.

It was following that conference I submitted my second representation on A/76/20/PL reiterating that my main concern remained the potential this development has to increase flood risk to others and added that local residents, along with me, could confirm that runoff from this site has been a problem in the past. There was particularly serious flooding in 2002 when runoff from the site ran between bungalows on the north side of Garden Close onto Garden Close and into Chantryfield Road where I live and this is already an unacceptable exceedance flow route from the site. At that time the development site was 'green field' with virtually no artificial impermeable surfaces.

I am repeating some of what I said in my e mail of 14th November 2021 because they help to define what I am talking about.

The current proposal seems to be two parallel surface water drainage routes off this site to Arundel Road.

Firstly the '**new pipeline**' referred to above.

Secondly the existing ordinary watercourse mostly currently in open channel north of Woodlands Close and Garden Close and then piped or culverted north of Pine Trees Close and Furzefield Close. Documents associated with A/76/20/PL (the FRA and Appendices Drainage Details dated 20/05/2020) express serious concern over the condition and efficacy of this conveyance system and particularly the piped length.

To be specific page 78 of the FRA and Appendices Drainage Details document is an Arun District Council key plan that shows the line of what I have termed '**second drainage route**' (the piped section) along the rear of properties at the north of Pine Trees Close and Furzeffield Close. In itself this plan is worrying in that it shows the pipeline running underneath garages. It is also annotated at one point with the comment 'blocked by football'.

I now refer to pages 110, 111 & 112 of the same FRA and Appendices Drainage Details document.

Page 112 seems to be correspondence from Paul Cann of Arun to a Mark Akmenkalns probably from 2017 since it follows an e mail dated July 2017. This contains a comment with regard to the piped section of the second drainage route '*There are historical known problems with this system, especially where it is culverted through Furzeffield Close*'.

Pages 110 & 111 are an e mail dated 5th November 2019 from Paul Cann of Arun to a Stuart. This lists multiple problems with this piped or culverted section. These include holes and fractures. More specifically, on the upstream length of pipeline there are comments;-

- # *On verge of collapse (under building?)*
- # *Metallic spike from fence post/fractures.*
- # *Intruding poor connection and football obstruction (Survey abandoned)*

It is unclear whether the survey was completed and whether remedial works were undertaken or will be undertaken in the future.

Dated 21st February 2022 on the website for Application A/188/21/DOC there is a substitute plan described as 'Section 104 Agreement Plan 20079/100S104H'. This drawing shows the '**second drainage route**' and the '**new pipeline**'. It shows the attenuation basin and indicates a Hydrobrake limiting flow to the 'new pipeline' to 9.2 litres per second. It also shows an emergency spillway to '*direct flows during extreme events towards diverted ditch course away from attenuation basin*'. This is same ditch that discharges into the pipe / culvert (the '**second drainage route**') under the rear gardens of properties to the north of Pine Trees Close and Furzeffield Close.

In my opinion the problem here remains the flood risk to others off this site. It also relies on directing excess flows from the site and the attenuation basin into the ditch which discharges into the '**second drainage route**' which is a pipeline / culvert with significant known conveyance problems.

Under normal conditions runoff from this site into '**the new pipeline**' will be restricted by a Hydrobrake. Once the inflow rate to the Hydrobrake exceeds its design capacity the water level in the attenuation basin will increase, eventually reaching the emergency spillway level, entering the ditch and flowing into the '**second drainage route**'.

The '**second drainage route**' is the one which correspondence indicates has significant problems and it is unclear whether they have been rectified or will be rectified in the future.

Under the proposed method of operation water may be spilling over the emergency spillway when there may still be conveyance capacity available in the 'new pipeline'.

I am therefore, surprised, that the control chamber (CC38) which contains the Hydrobrake does not also include a high level weir, set below the level of the attenuation basin emergency spillway so that the conveyance capacity of the '**new pipeline**' can be fully used before the attenuation basin discharges over the emergency spillway.

I remain unaware as to whether the '**new pipeline**' and the '**second drainage route**' discharge to the same drainage system in Arundel Road.

Please consider those, off site, who may be adversely affected by these proposals.

Regards

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3rd March 2022