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From: Geoff Gibbs

Sent: 30 January 2022 17:41

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

Subject: A/256/21/RES Land North of Water Lane Angmering

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A/256/21/RES

Land North of Water Lane Angmering

Approval of reserved matters following outline consent A/40/18/OUT for the erection of 525 No dwellings & associated parking, landscape, play areas and public open space.

I have become aware of Planning Applications A/256/21/RES, A/252/21/DOC and A/248/21/RES. I find the several 'applications' for the same site confusing particularly because of the volume of documentation posted. It is difficult to know against which application to make a representation on a particular issue.

I object to A/256/21/RES because I believe it is unsustainable on the grounds of the flood risk it presents to others.

National Planning Policy Framework – Technical Guidance

I commented upon the outline application for this site, A/40/18/OUT. I feel all of these applications have failed to demonstrate to me that they satisfy NPPF Technical Guidance in this respect:-

'Zone 1 - low probability

Flood risk assessment requirements

For development proposals on sites comprising one hectare or above the vulnerability to flooding from other sources as well as from river and sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off, should be incorporated in a flood risk assessment. This need only be brief unless the factors above or other local considerations require particular attention.

Policy aims

In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of sustainable drainage systems.'

The site is defined as Flood Zone 1. I do not believe it has been demonstrated that this will not 'increase flood risk elsewhere' and thus do not see that it will 'reduce the overall level of flood risk in the area and beyond.'

Arun District Council's Planning Policy – The Arun Local Plan 2018

Turning now to your Council's own Planning policy.

Policy W DM2 requires for a site such as this:-

'b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.'

and

'f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e. consideration of flood flow routing and utilising temporary storage areas.'

The Drainage Statement included with this Application along with the Flood Risk Assessment included with the Outline Planning Application do not satisfy me that the two requirements above have been met in important regards.

With regard to (b) above I am not convinced that flood risk elsewhere will not increase.

With regard to (f) above I believe that 'consideration of flood flow routing' should be taken as identifying flood exceedance routes both on-site and off-site. I see no evidence of the identification of flood exceedance routes.

Throughout Government and other guidance is clear that new development should not increase flood risk to others.

Section 18.3.5 states:-

'The Lower River Arun is another sub-area within the Arun and Western Streams Catchment. The CFMP identifies that this area includes the towns of Arundel and Littlehampton and the flat floodplain between. The Lower Tidal River Arun Strategy adopted by the Environment Agency in 2014, identified a range of flood risk management measures for the River Arun and the Black Ditch. The Strategy breaks down the River Arun and its flood plain into several strategy units, of which a number are located within the District.'

This site, with 525 dwellings along with commercial development will be the largest single Angmering development discharging to the Black Ditch which has known flooding problems affecting people, property and transport links downstream of this site.

Arun District Council's published – Supplementary requirements for surface water drainage proposals

These state, with regard to SuDS selection:-

'The following destinations must be considered for surface runoff in order of preference:

- 1. Discharge into the ground (infiltration).*
- 2. Controlled discharge to a surface water body.*
- 3. Controlled discharge to a surface water sewer.'*

This is the hierarchical approach contained across Government and other guidance. I believe that infiltration has not been adequately investigated and that too much reliance has thus been placed upon controlled discharge to the Black Ditch.

I have already mentioned exceedance routes when commenting upon the Local Plan and they are mentioned again here as:-

'When SuDS are overwhelmed by exceptional rainfall, then exceedance routes are required to protect people and property. These provide unobstructed overland flow routes from the development and should be considered for all drainage schemes. Exceedance routes should also be protected from future changes in land use.'

I repeat that I can see no evidence of flood exceedance routes both on-site and off-site

Arun District Council's published - Surface Water Drainage Proposal Checklist

This states:-

'Groundwater monitoring should be undertaken during the winter period (October to March inclusive) to enable the peak annual groundwater levels to be established. The duration of monitoring required for smaller developments (e.g. those consisting of less than 10 properties) can be discussed with the LPA's Engineers as; for some locations, a shorter duration may be acceptable. However, unless dispensation is agreed in advance with the LPA's Engineers, a full winter season of monitoring should be undertaken. Groundwater on sites near the coast may be influenced by tidal conditions and therefore this consideration needs to be factored into the monitoring programme.'

This, most important activity, has not been satisfactorily undertaken.

Your Council's drainage engineer's comments on the current application.

My own concerns may well be timely because Arun District Council's drainage engineer has commented, in the penultimate paragraph of her consultation response dated 4th January 2022 on A/256/21/RES, as follows:-

*'In summary, insufficient detail regarding the existing ordinary watercourse network has been supplied to support the proposed layout. We wish to raise a **holding objection**' to this application. Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. Furthermore, inadequately considering drainage at this stage could potentially result in a lack of sufficient capacity being provided for surface water drainage and therefore the development could lead to an increase in flood risk elsewhere.'*

I endorse what your Council's drainage engineer says and you should take what she says seriously.

You should particularly note these two sentences:-

'Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. Furthermore, inadequately considering drainage at this stage could potentially result in a lack of sufficient capacity being provided for surface water drainage and therefore the development could lead to an increase in flood risk elsewhere.'

They sum up the philosophy behind the drafting of Planning Policy Statement 25 on development and flood risk which was substantially incorporated into the National Planning Policy Framework (NPPF) and its Technical Guidance.

I refer often to The State of the Nation Report on Infrastructure of 2010 published by the Institution of Civil Engineers which said:-

'Flood risk management must be at the start of the planning and development process, not at the end.'

Context and the Environment Agency's views on a nearby, but much smaller development site.

The current site is Flood Zone 1 and thus the Environment agency was not consulted upon this Application. However, the proposal is to discharge much of the surface water from the major part of the site to the Ordinary Watercourse Black Ditch, just a short distance upstream of its Main River limit. This major discharge will have a significant impact upon the Black Ditch which becomes a Main River just few metres downstream of the discharge point. For this reason I reproduce below what the Environment Agency commented upon A/99/17/OUT which was the Outline Application for 'Land South of Water Lane'.

'Advice to the LPA/Applicant

Other than the above observations, the main issues on the site relates to surface water run-off. The acceptability of the proposal will be determined by the Lead Local Flood Authority (LLFA). We note that initial comments have been made by the LLFA Drainage Engineer, where matters relating to greenfield run off, infiltration containment within the site, SUDS design, infiltration testing etc. have been highlighted, and that further detailed investigation is required.

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 above referred to the site south of Water Lane where 175 dwellings are being built. The same could be said of this current site (on the opposite bank of the Black Ditch) where 525 dwellings (three times as many) are proposed along with a possible future commercial area.

This all serves to maintain the Objection I made to this 'north of Water Lane' site at the Outline stage in that I still consider it has not been demonstrated that flood risk to others will not increase.

Planning History

I recognise that the Arun Local Plan has been adopted since the submission of the Outline Planning Application for this current site and that the Outline Application has been approved.

I submitted a detailed Objection to the Outline Planning Application particularly on flood risk issues and nothing has happened to change my views. I see no evidence of further ground investigation and infiltration investigation and I am not aware of any significant winter water table monitoring..

Technical Comments

At the Outline Approval stage I said I believed that the geology of the site was such that appropriate and diffuse infiltration could probably form part of sustainable surface water management for this site and I therefore believed that infiltration for the site had been rejected prematurely based upon very limited investigation and that further investigation should be undertaken

I also said I believed more extensive infiltration testing needed to be undertaken prior to the Outline Application being considered. Various guidance documents including Building Regulations, the NPPF and BS8533 require a hierarchical approach to dealing with rainfall on site being firstly infiltration, secondly discharge to a water body and finally discharge to a surface water sewer. I believe the investigation already undertaken is insufficient. Elsewhere in Arun's area diffuse infiltration has proved most effective when, initially, infiltration had been discounted and this been reported in technical papers.

I also said that I found it surprising that, for a site of this extent, only two soakaway tests were undertaken.

Nothing in the current Reserved Matters Application changes my view on this.

Application A/40/18/OUT approval

Conditions 27 to 30 inclusive relate to surface water drainage matters.

The separate Planning Officers Report in Comment 2 includes:-

'It should be noted that full winter groundwater monitoring and infiltration testing must be completed to enable discharge of the drainage conditions that are proposed to be imposed upon this application.'

Planning Condition 27 has a similar requirement.

I cannot see evidence in the Reserved Matters Application that this has been undertaken. This outstanding investigation and monitoring must be undertaken before the Application is determined.

The Drainage Statement (December 2021) submitted with A/256/21/RES

I found this document difficult follow. This is partly due to the poor definition of the version on the web which is not helped by the fact that it may have originally been a colour document and there are drafting and typographical errors.

I believe that, had further site investigation been undertaken, infiltration could have provided a larger part of the drainage solution with benefits to others, including those off-site, at flood risk.

On pages 3 and 4 the document refers to Adur District Council's Local Plan and reproduces Planning Policies, which I do not recognise as Arun's and assume to be Adur's. This needs correcting.

The computation of greenfield runoff rate table on page 6 cannot be read and is fundamental.

On page 7 at 3.4.1 it says:-

'A site investigation was undertaken in February 2018 and a Supplementary Site Investigation undertaken in February 2021 both by idom.'

I have not found the Supplementary Site Investigation undertaken in February 2021 and would like to see this.

If table 1 on page 7 has been produced including the results of the supplementary investigation it demonstrates significant variability in the depth to London Clay and the makeup of the overlying material over the site. For this reason I would have expected to see rather more than just two soakaway trial pits.

On page 7 at 3.4.4 refers to a Supplementary Flood Risk Assessment dated 21018 (sic) (presumably 2018) by idom. Is there a supplementary flood risk assessment because the quotation appears to come from the original outline Flood Risk Assessment?

Similarly, on page 8 at 4.3.2 there is a typographical error where 21018 should be 2018.

On page 9 at 4.3.6.2 I wonder if the figure 680 l/s is correct.

Application Ref: A/184/21/PL for Construction of a weir upstream of the culverted road access to the Land South of Water Lane Development, Angmering as Phase 1 of the Angmering Flood Alleviation Scheme

On Friday 28th January 2022 you Approved Application Ref: A/184/21/PL for Construction of a weir upstream of the culverted road access to the Land South of Water Lane Development, Angmering as Phase 1 of the Angmering Flood Alleviation Scheme. I supported that Phase 1 Application. This is important because it should also control the runoff from the site of the present Application within the Black Ditch. It must be remembered that this is phase 1 and that further works will be necessary to optimise this scheme. These further works should include a trash screen arrangement upstream of the weir to protect the control structure from blockage along with active control of the flow throttling arrangement. It is only by having an active flow control system using water levels (including those downstream of the weir) that we can have a scheme that offers the greatest flood risk reduction benefit downstream through making optimum use of upstream storage.

In conclusion I object to A/256/21/RES because I believe it is unsustainable on the grounds of the flood risk it presents to others.

Regards

Geoff Gibbs

45 Chantryfield Road

ANGMERING

30 January 2022