

[REDACTED]

From: Geoff Gibbs [REDACTED]
Sent: 17 February 2022 15:20
To: Michael Eastham <Michael.Eastham@arun.gov.uk>; Planning <Planning@arun.gov.uk>
Cc: Angmering Parish Council [REDACTED]
Subject: A/270/21/OUT

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I am unable to use your website because it ignores the formatting of my text.

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 earlier Applications for this site (A/36/18/OUT & A/122/19/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 continues to be that there is little enthusiasm for further residential development within and on the edge of the developed part of Angmering.

I am aware that, despite Objections to A/122/19/OUT, you Approved it, subject to compliance with Conditions and Section 106 Agreements.

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, a significant amount of which is likely to be lost and the commercial development proposed may not appropriately compensate for this. The proposal for 1,393 square metres of Class E floor space is trivial, the change of Class questionable, while possibly not being commercially worthwhile. 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 access 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. Since Bramley Green was completed there has been significant further development east of Roundstone Lane, construction has commenced south of Water Lane and west of Dappers Lane and 525 dwellings are likely to follow north of Water Lane. A new, two or three-form entry, secular primary school must be opened before any further residential development is permitted in Angmering. To me what happens to developer contributions for a new primary school, sports facilities and highway improvements and other things remains a mystery.

Flood Risk

The site is Flood Zone 1 and, having examined the infiltration test results accompanying this Application and the previous Applications, I believe the concerns continue to be surface water and groundwater resulting in potential increased flood risk to others.

I feel the current Flood Risk Assessment (FRA) and the investigation it is partly based upon (Phase 2 Geotechnical and Geo-environmental Site Investigation) for the current Application contain insufficient evidence (and, indeed, conflicting information) to support the rejection of infiltration as a means of managing flood risk.

The investigation contains the early statement *'Surface drainage from the site appears to be discharged into the ground'*. In this particular investigation, infiltration tests were undertaken in only three trial pits and it is stated *'Based on the results of the soakaway tests presented in above table [not reproduced here], the ground conditions do not appear suitable from a geotechnical viewpoint for the use of pit soakaways to discharge water into the shallow Head deposits'*. This could be taken as implying that currently diffuse infiltration works but it will not post development.

BS 8533 '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 FRA that accompanied the previous Outline Application stated 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 was not surprising to me, given the topography and geology, that the encountered groundwater levels and infiltration rates were what they were. Based on this, the earlier FRA proposed discharge to a watercourse via an attenuation basin. As explained above much guidance, including the NPPF, require the hierarchical approach to surface drainage (as, indeed, does your Council's own drainage engineer) and I believe infiltration has been prematurely rejected without adequate investigation. Specifically I consider the earlier FRA and this latest FRA are inadequate in that they do 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 earlier FRA said *'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 am aware that the Environment Agency has reported on this.

Your Council's own drainage engineer indicated the need for further infiltration investigation and vital winter groundwater monitoring with regard to A/122/19/OUT with which I concurred. She also expressed much the same opinion eighteen months earlier in respect of A/36/18/OUT but despite the time that has elapsed until now, we only seem to have soakage tests on three further trial pits and, most importantly, I see no evidence of winter groundwater modelling.

I support your Council's drainage engineer's request for a holding objection at this time. I make no apologies for reproducing what she has said:-

'Please submit a surface water drainage strategy to evidence that there is adequate space within the proposed layout for surface water drainage. The surface water drainage strategy should also evidence that the hierarchy for sustainable drainage will be followed, with infiltration fully investigated. We wish to raise a HOLDING OBJECTION at this time.

Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. Leaving drainage design until the layout has been agreed will likely unduly prejudice drainage design and not allow for the hierarchy for sustainable drainage to be followed.

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 increased risk of flooding elsewhere.'

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 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 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 to an earlier Application for this site would be a significant local benefit.

It is unfortunate that Consultation responses from National Highways in respect of the A27 and West Sussex County Council in respect of local roads and rights of way have not yet appeared on your website in respect of the current Application.

Turning movements at the B2225 / A27 (Hammerpot) junction (a junction very close to this site) have been greatly restricted in recent years with both the right turn out of the B2225 (Arundel Road) and onto the B2225 (Arundel Road) prohibited. Those from Angmering, who reach the Hammerpot junction and want to travel east, have to travel west and undertake a 'U' turn at Poling to join the east bound A27. I am a Chartered Civil Engineer having studied highway and traffic engineering and have observed the various changes at the Hammerpot junction.

Clearly, this development will generate further 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 thus increasing the need to travel. Because the A27 is part of the trunk road network, I consider it is a higher capacity and preferable 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 drive through residential 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. I understand that various developments in Angmering will fund 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 (and NMU) crossing phases 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.

Geoff Gibbs

45 Chantryfield Road, ANGMERING

17 February 2022