

From: Geoff Gibbs [REDACTED]
Sent: 28 April 2022 19:11
To: Planning.Responses <Planning.Responses@arun.gov.uk>; katy.sharp@arun.gov.uk; Planning <Planning@arun.gov.uk>
Cc: Angmering Parish Council [REDACTED]
Subject: Re: Planning Consultation on: A/270/21/OUT

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

I refer to your e-mail of 11th April 2022 regarding '*an amendment to the above application*'.

I am sending this as an e-mail rather than using your website because of formatting issues.

It is worrying when, at a late stage, ninety five substitute documents are posted on your website and described in your e-mail to those who submitted representations as '*an amendment to the above application*'.

I have briefly looked at the amended documents in general but considered flood risk in more detail and see nothing to cause me to remove any of the objections I made in my representation dated 17th February 2022.

With regard to the flood risk assessment dated March 2022.

4.3.3 states that, in the context water depth measurements, '*.... gas monitoring was undertaken*' I do not understand this.

5.2.2 states that '*... infiltration drainage is deemed unfeasible at the development site*'.

5.3.2 states that '*.... the volume of runoff leaving the site cannot be reduced to greenfield / existing values ...*'

The proposal seems to concentrate on managing the flood risk to the site itself but the impact of site is just as, if not, more, important.

I repeat what I said in my objection dated 17th February 2022 (underlined).

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.

The lower Black Ditch catchment will clearly become stressed if sea level rise continues as the Environment Agency alluded to in responding to an earlier outline planning application for this site. I believe more work is necessary to achieve drainage of the site that more closely replicates what happens now and does not adversely impact off site.

Geoff Gibbs

45 Chantryfield Road ANGMERING

28 April 2022

On Mon, 11 Apr 2022 at 15:33, <planning.responses@arun.gov.uk> wrote:

To: **Geoff Gibbs**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: A/270/21/OUT
Registered: 4th January 2022
Site Address: Land off Arundel Road Angmering
Grid Reference: 506487 105336
Category: Plan Applicat'n
Description of Works: Hybrid application comprising:
a) Demolition of existing buildings;
b) Full planning application for the development of 160 No. dwellings with open space, landscaping and sustainable drainage systems (SuDS), and two vehicular access points from Arundel Road;
c) Outline application with all matters reserved except for up to 1,393 square metres of Class E floor-space with associated parking provision and 2.1 hectares of sports pitch land.
This site is a Departure from the Development Plan

I am able to inform you that I have received an amendment to the above application dated 11th April 2022 relating to:- amended description.

[Click here to view the plans and documents](#)

If you should wish to make further representations as a result of this amendment you should click the link below and then click on 'Enter comment'.

[Click here to make further comments](#)

Please make any further comment by **13th May 2022**.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Katie Sharp

Planning Case Officer- Arun District Council

Telephone: 01903 737832

Email: katy.sharp@arun.gov.uk

PL/REC/001 (008) 2018

<http://www.arun.gov.uk>

DX 57406 Littlehampton

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