

Bronte Welham

From: Carolyn Nysingh on behalf of Planning
Sent: 25 April 2018 09:56
To: Planning Scanning; Planning.Responses
Subject: FW: Planning Application Reference A/36/18/OUT Land off Arundel Road, ANGMERING, BN16 4ET

Carolyn Nysingh | PA to Karl Roberts, Director of Place, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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[REDACTED]
Sent: 24 April 2018 14:18
To: Anita Gardner; Planning
Cc: Angmering Parish Council; Rob Martin
Subject: Planning Application Reference A/36/18/OUT Land off Arundel Road, ANGMERING, BN16 4ET

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

Lack of a 'Made' Local Plan

In February 2018, I responded to your yet 'further consultation' on main modifications of your Arun Local Plan 2011 – 2031. This followed my representations last year on your version of the draft Local Plan and earlier still on your HELAA consultation. In all of those I 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 must be no further inappropriate development of the Black Ditch catchment both within Angmering and upstream of Angmering. Additionally, my reading of local opinion is there is no particular enthusiasm for further residential development within and on the edge of the developed part of Angmering. Further delay in Plan production may result in it being overtaken by a revised NPPF.

At this stage, you must regard this Application as premature since the Draft Local Plan and, presumably, recent 'further consultation' responses are still being considered by the LPA. To approve this Application before the possible eventual adoption of the Draft Local Plan would prejudice the outcome of the further examination of the Draft Local Plan and, frankly, make a continued mockery of the whole, 'democratic', Local Plan production process.

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 this you approve this Application, it will effectively disregard the Neighbourhood Plan. The Neighbourhood Plan remains the only extant local planning development document.

Loss of local Employment

There is a certain amount of local employment on this site, which will be removed. Angmering needs more, not less, local employment and not 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 nothing has been forthcoming. A new, two or three-form entry, secular primary school must be opened before any further residential development is permitted in Angmering.

Sewerage and sewage disposal

The response from Southern Water expresses significant concerns about inadequate capacity within the foul sewerage network. Southern Water then specifically say:-

'Unfortunately, it may be several years before adequate infrastructure is provided via a prioritised capital expenditure programme. Therefore, this proposed development would be considered premature until such time adequate sewerage infrastructure could be provided.'

I also **object** because of inadequate sewerage infrastructure.

Flood Risk

I accept that the site is Flood Zone 1 but to me, having considered the infiltration test results, this means the issues are likely to be surface water and groundwater resulting in potential increased flood risk to others.

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 this 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) 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 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 and thus reduces the risk 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.

The FRA also states that West Sussex County Council (WSCC) was consulted as part of the FRA but that, at the time of writing the FRA, no response had been received. This is worrying because WSCC are the Lead Local Flood Authority (LLFA) with responsibilities regarding local drainage issues. WSCC as LLFA are also now the Statutory Consultee on surface water drainage matters for major planning applications such as this. To date I have not seen a consultation response from WSCC as LLFA for this Application on the Arun planning website.

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 200 dwellings will impact adversely on the local highway way network and its connections with the A27, A259 and A280. The proposed main vehicular access to the site is via the Arundel Road (B2225) between At St Margaret's School and the B2225 / A27 (Hammerpot) junction at a point where the speed limit is 60 mph. To the south traffic conditions become dangerous around St Margaret's Primary School twice a day on school days compounded by unsafely stopped vehicles. 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 are compounded by 'U' turning movements at junctions on the A259 locally and a 'U' turning facility at Poling to allow traffic from Angmering to access the east bound A27 from the Hammerpot junction.

Clearly, the development will generate additional road traffic, which will add congestion and danger to local roads. It is 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, two items of essential highway works should be undertaken:-

The prohibited traffic movements at the Hammerpot junction should be reinstated in a safe manner. I see that Application A/99/17 is now proposing an unrestricted roundabout junction at the currently restricted Water Lane / A280 Angmering 'by pass' junction so there is a clear precedent for new development providing highway junction improvements. My preference is for a traffic signal controlled junction since this can provide much-needed pedestrian crossing phases thereby improving both pedestrian and road vehicle safety and convenience. My further preference is that, in the vicinity of the Hammerpot junction, the A27 speed be reduced to a safe level below the current National speed limit. In addition, 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. The trunk road authority has operated traffic light junctions on dual carriageway lengths of the A27 in West Sussex at Shoreham Airport and Oving Crossroads for many years.

The other significant benefit would be the provision of a pedestrian controlled traffic signal crossing of the B2225 in the vicinity of St Margaret's School.

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

