




From: Geoff Gibbs [REDACTED]
Sent: 06 May 2018 14:45
To: Planning; Michael Eastham
Subject: A/38/18/RES Manor Nursery Garden Centre, High Street ANGMERING

A/38/18/RES

Manor Nursery Garden Centre, High Street ANGMERING

I **object** to Application A/38/18/RES.

Along with very many other local residents I submitted a detailed objection (my letter of 29th May 2014) to the outline application A/51/14/OUT but despite all of that you granted Outline permission with Conditions.

This has been variously described as being part of a 'strategic allocation' and in accordance with a 'masterplan'. Since an entirely suitable vehicular access is available from the related development on the south boundary of the site and thus I am amazed that it is yet again proposed that the development is accessed by a single vehicular access from the High Street. A single vehicular access to this size of development from High Street is entirely unsuitable.

Technical criteria for objecting to High Street as the access to this development comes from the 'Manual for streets' which indicates what various carriageway width can accommodate a large vehicle (say a typical delivery vehicle) to pass a normal size refuse vehicle (the minimum requirement is 5.5 metres) and for a large vehicle to pass a car (the minimum requirement is 4.8 metres.) I note that what I assume is a 'modified' High Street will have lengths at 4.8 metres wide reducing to as little as 3.4 metres at points. Making even these changes to High Street would not meet the access needs, is entirely unnecessary because of the alternative access available from the south and will significantly change the tranquil nature of the ancient road much used by pedestrians. Common sense would indicate that the northern access should be for pedestrian use but be of such a width and surface treatment that it could be used by vehicular traffic in a genuine emergency.

I thus **object** on the grounds that the proposed vehicular access is entirely unsuitable. Additionally, so called 'improvements' to High Street will change its tranquil nature and, with a suitable vehicular access available from the south, are entirely unnecessary.

I objected to the Outline Application in some detail regarding flood risk and particularly the flood risk to others from surface water.

Your Council's Decision on A/51/14/OUT Condition 21 states:-

'Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the SUDS Manual produced by CIRIA.

Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details.

Reason : To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.'

This presumably followed the consultation response from your engineers dated 16th May 2014.

Your Council's Decision on A/51/14/OUT Condition 24 states:-

'Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified:

- all previous uses*
- potential contaminants associated with those uses*
- conceptual model of the site indicating sources, pathways and receptors*
- potentially unacceptable risks arising from contamination at the site.*

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority.

The scheme shall be implemented as approved.

Reason: To ensure that the development complies with approved details in the interests of protection of the environment and prevention of harm to human health in accordance policies GEN7 and GEN31 of the Arun District Local Plan.'

This presumably followed the consultation response from the Environment Agency dated 22nd May 2014 which stated that:-

'No development permitted shall begin until such time as a scheme to dispose of surface water drainage has been submitted to, and approved in writing by, the local planning authority. The scheme shall consider the risk posed to groundwater quality, and be implemented as approved.'

Reason

To ensure that surface water drainage from the proposed development does not result in a deterioration of groundwater quality in accordance with the NPPF.'

These Conditions seem to me to be aimed at satisfying your engineers that infiltration on this site will work and flood risk to others will not increase and satisfying the Environment Agency that surface water drainage will not result in a deterioration of ground water quality.

A Flood Risk Assessment was included with the Outline Planning Application but does not appear to contain any site investigation results, percolation measurements or groundwater monitoring results.

The Flood Risk Assessment and Development Drainage Strategy published on your website dated 21/03/2018 for A/38/18/RES appears to be the same report submitted at the Outline Planning Application stage.

A Drainage and Maintenance Statement (D&MS) dated 19th March 2018 was also published on your website on 21/03/2018. This discusses the geology of the site based upon published information but contains no site-derived information. No tests appear to have been undertaken on the site to obtain permeability or groundwater level information or contaminated land information. The D&MS states:-

'The information available in the public domain for the adjoining site confirms infiltration varies between 4.0×10^{-3} m/s and 5.0×10^{-4} m/s within the sand/gravel layers of the river terrace deposits. It is assumed that these infiltration rates are likely to be achieved for this site.'

The D&MS appendices included standard infiltration design calculations but these were based upon a 'standard figure' derived from the figures above taken from an 'adjoining site' and not from specific site derived information.

Bearing in mind the Environment Agency's comments at the Outline Application stage I was surprised by their response at the Reserved Matters stage when it appears no site investigation has been undertaken.

I **object** based on the inadequacy of the evidence upon which the infiltration drainage calculations have been undertaken. The Applicant appears not to have undertaken the site investigation that was required of him by your drainage engineers to establish site based permeability and ground water level information or satisfied the contaminated land issues raised by the Environment Agency at the Outline planning application stage. My particular reason for this objection is the lack of evidence that flood risk to others will not increase.

Since you granted Outline Permission, West Sussex County Council (WSCC), as Lead Local Flood Authority (LLFA), has become the statutory consultee on surface water matters for development proposals of this type. I have not yet seen a consultation response for this Application on your website from the LLFA.

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

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