





From: Geoff Gibbs [REDACTED]
Sent: 07 May 2018 13:27
To: Michael Eastham; Planning
Subject: Planning Application Reference A/40/18/17/OUT Land North of Water Lane, Angmering

**Planning Application Reference A/40/18/17/OUT
Land North of Water Lane, Angmering**

I have had this brought to my attention and I object to this Planning Application.

I objected to a very similar and, it seems, related, Planning Application almost a year ago for Land South of Water Lane, Angmering (A/99/17/OUT).

Continued Lack of a 'Made' Local Plan

In February 2018, I responded to your 2018 'further consultation' on main modifications to your Arun Local Plan 2011 – 2031. I will refer to this again when I consider flood risk below. This followed my representations last year on your then 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 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 and lack of evidence to support need for further residential development in Angmering

There is currently local employment on this site, which will be removed. It is unclear whether, commercially, any employment will actually replace it within Angmering. Angmering needs more, not less, local employment and not further houses from which, those who need to work, will probably have to commute out of Angmering to find. Much documentation has been provided with this Application includes some 797 pages of transport assessment. This information included evidence that, of Angmering residents who do not work from home, more than 90 % of them work outside Angmering and almost two thirds of them work outside Arun. Indeed, more than half of Angmering workers travel to jobs in Worthing, Horsham and Chichester and perhaps this is where new residential development, if needed, should be located.

Primary Education

The community anticipated 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.

Flood Risk

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 and this worries me greatly.

Plan Production background to flood risk

A significant aspect of the evidence submitted by Angmering Parish Council and many residents to the original 2017 consultation on the Local Plan (2011-2031) was with regard to the potential for further development to increase the risk of flooding to existing development and the people therein.

I was pleased that your January 2018 consultation (to which I responded in February 2018) included a specific document on the 'Angmering North' allocation landscape issues. However, I was disappointed that you did not produce a further document to answer the issues I previously raised, along with the Parish Council and others with regard to the potential for the 'Angmering North' allocation to increase flood risk to others. This was particularly important because of the identified, but still unresolved, inconsistency between two of your official documents, the first of which was included with your 2017 consultation on the Local Plan (2011-2031) and the second tabled, at a very late stage, at the examination in public.

For the avoidance of doubt, I believe 'Angmering North' includes the sites south and north of Water Lane covered by A/99/17/OUT and A/40/18/OUT.

Within the documents provided for your 2017 consultation on the Local Plan the 2017 '*Arun Sequential and Exception test to inform Main Modifications*' document (ref PEPTP9) stated that, although the 'Angmering North' allocation did not pass the Sequential Test, you had not undertaken an Allocation Specific Flood Risk Assessment to comply with the Exception Test, and flood resilient construction techniques were proposed for that new development contrary to the requirements of NPPF. For those reasons I considered your Plan to be **not sound**.

At an extremely late stage during the examination in public in the autumn of 2017 an Arun document with reference ADCED75, titled '*Position Statement: Flood Risk September 2017*' was tabled and appeared on your Council's Local Plan Examination website apparently on 28th September 2017.

Along with the Parish Council, the seeking out of opportunities to reduce the causes and impact of flooding downstream from the 'Angmering North' allocation was clearly an objective of the various submissions to Examination. The inconsistency between two of your official documents mentioned above relates to:-

In PEPTP9 '*Arun Sequential and Exception Tests to inform Main Modifications*' dated February 2017, the Angmering North Allocation **does NOT pass the Sequential Test** and it is stated that the Exception Test is required although it is not properly undertaken.

In ADCED75 '*Position Statement on Flood Risk*' dated September 2017, the document sets out the areas of common ground with regard to flood risk for the proposed Local Plan allocations and says that **the Sequential Test HAS been passed**, without resorting to the Exception Test, but there is no satisfactory explanation as to the reason for this.

Government guidance remains quite clear that to satisfy the Exception Test two parts have to be complied with and the second is that the proposal will not increase flood risk to others and this can only be demonstrated by a site-specific flood risk assessment at the scale of the 'Angmering North' allocation. No such site-specific flood risk assessment at the scale of the allocation appears to have been undertaken. You provided no satisfactory explanation to explain the difference between these two documents produced only a few months apart.

For that reason, I still considered your plan to be **not sound** in February 2018.

Flood Risk – the Outline Planning Application

The most compelling reason for refusing this planning application is the increased flood risk to others it presents from a further urbanized development. We know that flows in the Black Ditch already exceed the highway culvert capacity at times and flooding to people and property results as illustrated in a photograph below. We have experienced quite dreadful flooding particularly in 2002 and 2012 and do not want that to be made even worse. From my examination of the available evidence I am not convinced that flood risk to others will not increase as a result of this development.

BS 8533:2011 'Assessing and managing flood risk in development – Code of practice' and the National Planning policy Framework PPF (both referred to in the Application FRA) 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 Executive Summary to the submitted FRA says, with regard to *'Flood Risk as a result of the Development'* (which must be 'to others' since *'flood risk to the Site'* is separately considered) *'Run-off from new impermeable areas and additional foul flows resulting in an increased risk of surface water, sewer and fluvial flooding, categorised as **high risk**'*.

On page 1 the FRA says *'The purpose of this report is to present the results of the FRA undertaken on the Site proposals. The information does not purport to be a detailed design and a quantitative assessment cannot be undertaken at this time'*. Although this is an outline application, this confirms that the FRA is insufficient and inadequate to support the Application. I consider this Application should be rejected because of inadequate supporting information.

On page 7 with regard to Groundwater flood risk to the site, it says:-

'The Groundshore@ reports, indicate that the highest susceptibility to groundwater flooding is identified in the search area (within 50 m of the boundary of the study site) based on the underlying geological conditions and it is considered to be potential at the surface (Clearwater Flooding), the British Geological Survey has assigned a high confidence rating to this result. However, no specific details or location are provided.

Quite clearly, this matter must be resolved before the Application is considered.

On page 16, the following is stated with regard to Consultation Responses:-

'6.2.1 The Lead Local Flood Authority for the area, West Sussex County Council were consulted by email on 25 August 2015 in relation to the site and any site specific flood history.

6.2.2 No response was ever received from the LLFA.'

I find this most worrying with flooding being such an enormous risk faced by many residents of Angmering, and because WSCC, as the LLFA is the statutory consultee on surface water drainage matters for major planning applications such as this. If you have not consulted WSCC as LLFA (as the statutory consultee on surface water matters for major developments) on this Application will you please do so promptly.

Under assessment of flood risk **from** the development.

On page 21 It says:- *'The potential impact of development on fluvial flows is considered to be **high** and action or mitigation will be required.'*

On page 22 It says:- *'The impact of the proposed development on surface water is therefore considered to be **high** and further action or mitigation will be required.'*

On page 23 there is a table headed *'SUMMARY OF FLOOD RISK FROM THE DEVELOPMENT'* which says:-

That for fluvial flood risk **from** the development, the risk of increase in fluvial flows is **high**, management of fluvial flows is required, and there is a need for further action.

That for surface water flood risk **from** the development, the risk is **high**, management of run-off is required, and there is a need for further action.

That for groundwater flood risk **from** the development the risk is **low**, and further action is required to verify groundwater levels and assess the risk from Clearwater Flooding. I find it surprising that this is considered 'low' when the BGS information is considered.

This summary of flood risk **from** the development is particularly important to existing residents and these issues must be resolved prior to the Application being considered.

Page 25 with regard to 'FLOOD RISK FROM THE PROPOSED DEVELOPMENT' says:-

'An assessment of the impact of the development on flood risk elsewhere has indicated that the proposed development has the potential to impact flood risk in the vicinity of the site, as follows;

- i) *Increase in the risk of fluvial and surface water flooding.'*

Page 26 with regard to DISPOSAL BY INFILTRATION says:-

*'The nature of the geology (the Site is situated on London Clay) as discussed in **Section 2.4**, means that the site is unlikely to be appropriate for infiltration.'*

I consider that the geology of the site is such that appropriate and diffuse infiltration could probably form part of sustainable surface water management for this site. I therefore believe that infiltration for the site has been rejected prematurely based upon very limited investigation and further investigation should be undertaken

I believe more extensive infiltration testing needs to be undertaken prior to the Application being considered. Various guidance documents including Building Regulations, the NPPF and BS8533:2011 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 now refer to the GEO-ENVIRONMENTAL ASSESSMENT REV A dated February 2018.

Under the heading HYDROLOGY it says on page 5:-

'The highest susceptibility to groundwater flooding in the search area based on the underlying geological conditions is considered to be potential at the surface, relating to Clearwater flooding (unconfined aquifer). The BGS has assigned a high confidence rating to this result.'

As stated earlier this is a matter which must be resolved before the Application is considered,

Under the heading site investigation methods on page 10 it says:-

'Two Soakaway tests (MSA101 and MSA102) at depths 1.90 m bgl 2.10 m bgl.'

I find it surprising for a site of this extent only two soakaway tests were undertaken.

Soakaways are discussed on pages 16 and 17. Again it says there were just two soakage trial pits. It is said:-

'The trial pit soakage tests demonstrate that the site has low permeability and as such soakaways could not be installed within other areas.'

It says that the soakage results are in Appendix 9 but I have been unable to locate these. Similarly, I have been unable to located appendix 7, which is said to include groundwater level data.

I believe infiltration has been prematurely dismissed without sufficient site investigation. Along with infiltration any run-off from the site should be limited to the values computed by the methodology of the Rainfall runoff management for developments (2013) document. Suitable storage should be provided and discharge routed so that it does not increase flood risk to others.

I repeat that BS 8533:2011 'Assessing and managing flood risk in development – Code of practice' and various Planning and Construction Guidance documents make it clear 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.'*

The photograph below of properties in Water Lane illustrates the dreadful consequences of flooding for the residents of Angmering downstream of this proposed development..



I note that Schedule 3 of the Flood and Water Management Act 2010 has not been implemented and I thus I believe your council should deal with this matter under planning legislation in the absence of a SuDS Approval Body.

I repeat that I **object** to this Application because I consider it has not been demonstrated that flood risk to others will not increase.

Highway Issues

Yet another 525 dwellings 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 Water Lane between Dappers Lane and the A280 Angmering 'bypass'. Water Lane and Station Road are already a busy rat run used by through traffic in preference to the A280 and A259 and vice versa.

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.

In the transport assessment, it says there will be a bus access to the site from Dappers Lane south of Culberry Nurseries but that general vehicular traffic will be prohibited from using this connection. I wonder how this arbitrary restriction will be enforced when elsewhere in the assessment, abuse of the 'no south travel of non buses through the underpass that takes Dappers Lane under the A27, is reported. This connection with Dappers Lane should be either open to all vehicles or closed to all vehicles (except in an emergency) and to avoid further increased use of Dappers Lane and rat running elsewhere I prefer the latter.

I am sending this as an e mail because I could not get you system to work for me.

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ANGMERING

May 2018