



Established 1894

Angmering Parish Council

The Corner House
The Square
Angmering
West Sussex BN16 4EA

25/06/19

A/40/18/OUT

Dear Michael and Neil,

Thank you for forwarding the response from ADC Drainage Engineers to the issues we raised in our letter date 20th June 2019.

You state that *"In meetings with the Environment Agency regarding the proposed flood alleviation scheme for Angmering all matters have been discussed, including this proposed development"*. This may be so, but, our concern remains that the Agency has NOT been given an opportunity to review and respond to the drainage proposals in this application.

We realise that since the site is flood zone 1 there was no requirement to consult the Environment Agency (EA). It is clear from the Flood risk Assessment that it is intended to discharge surface water from the new development to two points on the Main River Black Ditch. These will require permits from the EA, as they will wish to be satisfied with regard to the proposed rates of flow.

There has been dreadful flooding to property in Angmering in the past, particularly in 2002 and 2012, which led to the proposed EA's Flood Alleviation Scheme, which will address flow rates upstream of this development. The solution identified in the 2015 Mott Macdonald report was based on run-off from the existing fields. It must now not only consider the existing risk, but also worst case scenarios based on the latest Climate Change projections and mitigation requirements, plus the impact of development on the fields north and south of Water Lane.

It remains the Parish Council's view that to satisfy the concerns raised in our letter of 20th June, the scheme needs to be assessed comprehensively to confirm it can be delivered in its totality.

A **Master Plan approach** resulting in a flood management solution that consolidated the EA's Angmering Flood Alleviation Scheme, with appropriate on-site drainage works from these sites, would provide the greatest confidence that development of these two sites (North and South of Water Lane) will not increase flood risk to others downstream of this location.

P 11: *"Policy H SP2 of the Local Plan says: "Development proposals within the Strategic Site Allocations must be comprehensively planned" and goes on to say "As the three sites are physically separate, the aspects which would benefit from a comprehensive masterplan are limited, nonetheless, an integrated masterplan has been produced which shows how the North and South Water Lane sites could be developed and an assessment of this is provided in the **Technical Matters** below."*

A/40/18 and A/99/17 are inextricably linked to flooding issues in Angmering. APC have always insisted that because of the historic issues associated with flood risk from the Black Ditch, which effectively dissects the sites north (A/40/18/OUT) and south of Water Lane (A/99/17/OUT) which already has outline permission), major development in the north of Angmering should be master planned.

So, with all of A/40/18 AND part of A/99/17 proposed to drain to the Black Ditch (Flood Zone 3), until detailed testing and winter monitoring is completed on-site, it is not possible for you to claim that *"each development will not increase flow rates and there is no cumulative effect"*.

Therefore it remains the Parish Council's view that it is unacceptable to treat drainage from these sites in isolation from each other and the EA scheme. Especially as the single restraining factor will remain the capacity of the culvert that takes the Black Ditch under Water Lane.

Whilst Arun have delegated powers to approve discharge rates from developments, on **P26; under Technical Matters - Surface Water Flooding**; the proposed outline drainage strategy we are being asked to approve, clearly identifies not *"an ordinary watercourse"*, but the Black Ditch (a Main River) as the receiving watercourse for all 3 proposed attenuation basins.

*"The surface water drainage serving the northern catchment (Catchment Area A) would drain into attenuation basin A. The attenuation basin would normally be dry, with no water stored, and **the receiving watercourse would be the Black Ditch**. The surface water drainage serving the southern catchment (Catchment Area B) would drain into attenuation basin B - alongside the Commercial Park and the receiving watercourse would also be the Black Ditch. The south-western catchment would be served by a smaller attenuation basin with a **separate outfall to the Black Ditch**."*

The Black Ditch runs through the north of the A/99/17 (South of Water Lane) site (Photo 1). At higher rates of flow the watercourse comes over the bank and onto the floodplain. Some of the surface water from A/40/18 is intended to enter the Black Ditch over this length. This area is not believed to be in the scope of the proposed EA's Flood Alleviation Scheme.

The second photo shows flooding at the entrance of the motor racing circuit. It is located immediately west of "Water Lane triangle" (photo 3) which abuts the south eastern boundary of the site, and was created as a surface water balancing pond when the A280 by-pass was built. The remaining surface water from A/40/18 is intended to enter the Black Ditch in this triangle.



1. Black Ditch flood plane 2. Water Lane - Racing Circuit entrance 3. Water Lane Triangle balancing pond

The Environment Agency in their response to A/99/17/OUT (**P12 of the officer's report**) says: *Any proposed discharge to, bridging or culverting of this watercourse will require Environment Agency (EA) consent and the EA should be consulted in this respect* and that *"As part of the FRA it will need to be demonstrated whether the access route [by means of a bridge across the Black Ditch flood plain] will result in any flood plain storage loss, and whether flood compensation will be needed."*

Therefore it seems sensible that any proposals to discharge water to the Black Ditch needs to be factored in to the equation. It remains the parish council's view that the EA do have an interest and should have been consulted to confirm if a permit is required.

"It will be ensured via conditions that the development will not increase flood risk".

When one looks at British Geological Society information on this site and issues of a high water table at this location, which prevented infiltration testing during investigation testing at a neighbouring site (Broadlees) because the hole kept filling with water, achieving this will be challenging.

Our experience is that, in leaving such matters to **Planning Conditions**, unless written in a way that makes it absolutely clear to the applicant and others what must be done to comply with it, does not always guaranteed they will be interpreted or delivered as intended. It is particularly relevant in this case where the applicant may not ultimately be the actual developer (or developers) of the site(s).

For example, in the report, Arun's drainage engineer provides specific Policy targets for surface water run-off. Including an expectation that *"runoff post development for the 1 in 100 year plus climate change event will be less than 25% of that of the current runoff"*

It is accepted that Policies can change (for example recent advice on climate change) so wording needs to be carefully crafted, but at this point, we are not convinced that the conditions are specific enough to achieve the desired outcomes.

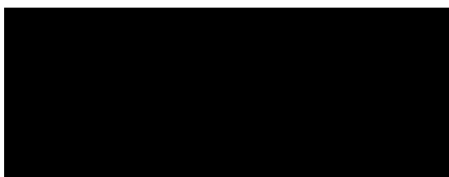
The meeting with Arun on 15th Feb was attended by Geoff Gibbs, a retired local engineer who has lived in Angmering for over forty years and has first-hand knowledge of the flooding experienced, particularly the dreadful events in 2002 and 2012. He remains a Chartered Civil Engineer and Chartered Scientist. His credentials include drafting much of the technical content of NPPF on flood risk. He also produced for Defra, guidance for LLFAs on how to regulate ordinary watercourses following the implementation of parts of the Flood and Water Management Act 2010.

He is particularly pleased that since new development must not increase flood risk to others, he identified the need for consistent methods to assess existing site runoff (against which development proposals should be measured) which resulted in the publication by Defra of 'Rainfall Runoff Management for Developments'. He managed this through to the publication of the current version in 2013.

Having reviewed A/40/18 in detail with regard to flood risk, he concluded that the application did not satisfactorily demonstrate that flood risk to others would not increase, as there is a lack of evidence that the measures proposed would work. He raised these issues at the meeting with Arun and was particularly concerned about the lack of investigation undertaken and the limited results obtained.

In discussion with Arun's drainage engineer, it was agreed that if the drainage solution had been considered as a whole, then a much more robust, effective and cost effective solution could have been considered and delivered.

Angmering Parish Council still believe that A/40/18/OUT should be removed from the agenda of the DCC meeting due to be held on 27th June 2019.



Katie Herr

Clerk to Angmering Parish Council