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Angmering Parish Council

The Corner House
The Square
Angmering
West Sussex BN16 4EA

20/06/19

A/40/18/OUT

Dear Neil, Karl, Cllr. Dr James Walsh and Members of the Development Control Committee,

Angmering Parish Council are concerned at the decision to schedule application A/40/18/OUT at the upcoming meeting of the Development Control Committee on Thursday 27th June 2019.

We believe the scheduling of this application before the DCC to be ill timed and premature.

We were alerted to a "Special Development Control Meeting" where we believed that, due to its size and complexity, it would need to be discussed in detail, not scheduled last behind 5 other applications.

After reading through the officer's report, we have identified the following:

- 1) The report says that the issues discussed at our meeting on 15th February with ADC officers have been addressed by the report. This is not the case. We are still waiting for a response from officers specifically to our query on how and where the developer proposes to deliver the land for the proposed primary school "back stop". These questions date back to emails which started in February 2019.
- 2) **Flood Risk Mitigation:** It is agreed that the proposed Conditions reflect the discussions at the 5th February meeting in regard to the site itself, as long as they are adhered to.

However, serious concerns raised at the meeting as to the lack of any consideration of the cumulative effect of surface water run-off and discharge into the Black Ditch from A/40/18/OUT and A/99/17/OUT (approved February 2019) have NOT been addressed in the report. Currently, drainage and flood risk to others, where considered, is still being done in isolation for each application.

Phasing of delivery of the EA's flood mitigation infrastructure, which will help manage fluvial flows towards the village (including run-off from both of these sites) and significantly reduce the existing risk of flooding to people and property downstream, MUST be agreed and designed in parallel, with the proposed drainage solution approved for each site BEFORE any site layouts are agreed or development takes place. Especially as the success of the EA's scheme relies on the need to calculate and manage flows from all sources, at rates downstream to a level that can be accommodated by the restriction resulting from the size of the culvert that takes the Black Ditch (which is classed as a main river) under Water Lane.

Despite Arun's engineer's response flagging up the risk of downstream flooding and that the EA have an interest, the EA were not consulted, even though they have regulatory powers over the Black Ditch regarding the adequacy of the downstream culvert and any discharge will require a permit from the EA. We assume, this is because the site is flood zone 1 and the planning process "tick sheet" does not require the EA to be notified.

Bearing in mind the history of flooding and runoff from these sites; which has been repeatedly highlighted by APC as well as in the EA's response to A/99/17/OUT in advice to the LPA/Applicant; we hoped that common sense and some joined up thinking would have prevailed, or that WSCC as LLFA would have queried increase flood risk to others.

The S106 contribution to the scheme, the funding of which is dependent on contributions from both sites, only becomes available from occupation of 1st dwelling. This is simply not acceptable. This infrastructure needs to be in place BEFORE any homes are occupied.

3. **Provision of the new Primary School** is a key infrastructure deliverable. The report confirms "the case for a new primary school has been made and accepted by all parties" and that "The County Council will be seeking to secure the land from the Parish Council which would ensure that the primary school requirements can be met."

However, this process stalled in March as we are still waiting on the results of WSCC's feasibility study; the Multi-Disciplinary Consultancy report (Faithfull & Gould). We were told that "there is nothing that causes us concern in the first instance" but have not seen the actual report. Due to the Angmering Advisory meeting being rescheduled until after the DCC meeting, a report that WSCC were going to right has not been sent round, despite it being requested. We still cannot get confirmation from WSCC as to the scope of the report and if it covers the WSCC land the skate bowl/BMX track would be moved to. If it is not covered, this may need to be addressed by a separate survey.

The officer's report says the "**back stop scenario**" is picked up in the S106" - we are unable to find this. There is also no planning condition or information on how the developer proposes to deliver the land for the proposed "back stop" if APC does not provide the land, or the feasibility study carried out by WSCC says it is not suitable.

The officer's report has target dates for contributions based on occupancy, but no reference as to what would trigger a stop to development if the new primary school was not in place.

The parish council still supports the findings of Arun's original sustainability appraisal, that because of the issues associated with the location of this Strategic allocation, it is unacceptable for development. However, having gone through EIP, and agreed as being "sustainable" only if based on the delivery of 800 dwellings, the infrastructure and phasing of the delivery of flood risk mitigation measures and the new primary school must be done properly and not left to chance.

The reason behind this letter to you all is to highlight our concerns and urge that this application be deferred so all the above points can be addressed satisfactorily before it is put before DCC members for approval.

Kind Regards

Katie Horne

Clerk to Angmering Parish Council