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From: Daun Johnson <Daun.Johnson@arun.gov.uk>

Sent: 07 July 2020 08:09

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: FW: A/76/20/PLLand at Dappers Lane Angmering 84 No. dwellings, public open space, play areas, associated infrastructure & landscaping. This application affects a Right of Way

rep

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From: Geoff Gibbs

Sent: 06 July 2020 18:49

To: Planning <Planning@arun.gov.uk>; Michael Eastham <Michael.Eastham@arun.gov.uk>

Subject: A/76/20/PLLand at Dappers Lane Angmering 84 No. dwellings, public open space, play areas, associated infrastructure & landscaping. This application affects a Right of Way

I **object** to this Planning Application.

I have been unable to use your on-line system to submit this objection and thus submit it as an e-mail.

Statement of Community Involvement

Apart from a mail drop and a website there has been no interaction by the applicant with the general public. I am aware emergency legislation has curtailed certain activities so surely it would be appropriate to postpone consideration of this Application until it can be considered in an open and unhindered manner.

Lack of convincing evidence to support need for further residential development in Angmering

Evidence included with another recent planning application showed that, of Angmering residents who did not work from home, more than 90% worked outside Angmering and almost two thirds worked outside Arun. Indeed, more than half of Angmering workers travelled to jobs in Worthing, Horsham and Chichester and perhaps this is where new residential development, if needed, should be located. Additionally when you add to the eighty-four new dwellings of this Application, further locations in the Parish where development has been approved, but not constructed, this total must approach 1000 units.

Flood Risk

My fundamental **objection** to this Planning Application is that the Applicant has not demonstrated this development will not increase flood risk to others. Having some experience in these matters, I have always believed that consideration of the impact of development proposals upon the existing community should be paramount. Of the recent planning proposals in Angmering on which I have commented, I believe this has the potential to have the gravest impact upon the area around where I live. The potential impact seems to extend from those to the south of the development site, properties on the 'culverted watercourse' at the north of Pine Trees Close and Furze Field Close and further away.

The National Planning Policy Framework at section 163 clearly says - *'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.'* I believe the Applicant's proposal has not demonstrated this. Further, the technical guidance associated with the National Planning Policy Framework on flood risk and coastal change states at section 50 that *'Local authorities and developers should seek opportunities to reduce the overall level of flood risk in the area and beyond'*. Again, I believe the Applicant's proposal has not demonstrated this.

Arun District Council's *'Surface Water Drainage Proposal Checklist'* states at paragraph 12 *'Unless specifically requested by the council's drainage engineers 'Exceedance Flow Route Plans are only required for developments of more than 5 residential properties or more than 0.5 ha of commercial development'*. Eighty-four proposed dwellings are well in excess of the threshold of five properties requiring an *'Exceedance Flow Route Plan'*. No *'Exceedance Flow Route Plan'* has been included with the submitted documents.

Local residents along with myself can confirm that unmanaged runoff from this site has been a problem in the past. There was particularly serious flooding in 2002 when runoff from the site ran between bungalows on the north side of Garden Close onto Garden Close and into Chantryfield Road where I live. This is already an unacceptable exceedance route. The existing site is a 'green field' with virtually no artificial impermeable surfaces.

The Application Form is misleading in that it answers 'no' to the question *'Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?'*

That answer is contradicted by West Sussex County Council as Lead Local Flood Authority (LLFA) (Description *'WSCC comments 16/06/20'* dated *'16/06/20'*) who, to the question *'Ordinary Watercourses nearby?'* answer *'Yes'* which is elaborated by the comment *'Current Ordnance Survey mapping shows an ordinary watercourse running adjacent to the site.'*

This is confirmed by the Applicant's own document described as *'External works layout 04 Rev B' dated 01/07/2020'* which indicates, with a blue line, a feature described *'3m Buffer Zone as required by Arun District council, in relation to the prevalent the watercourse.'* I interpret *'prevalent'* as *'presence of'*. A 1.8-metre high fence is shown between this watercourse and the rear gardens of properties in Garden Close and Woodlands Close.

When it comes to *'records of any flooding within the site'* the LLFA response is *'no'*. This does not accord with my experience, or those of other local people, but it may be that the LLFA have no such records.

From footpath, number 2151, which runs along the western boundary of the site, I have observed parts of the site to be saturated at times. On 29th February 2020, this footpath was flooded at its southern end as my photograph below (looking north) shows.



As I mentioned earlier when discussing exceedance routes, I recall, in 2002, water running off the surface of this site, onto the surface of Garden Close and along Garden Close into Chantryfield Road.

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. My local knowledge along with my analysis of the evidence indicates to me that to guarantee flood risk elsewhere will not increase, will require considerable works. I see no evidence that such necessary works are proposed.

The document description 'FRA' dated '20/05/2020' is rather difficult to follow because much of the original document must have been in colour while that on the planning system web site is black and white. In previous times, I visited Arun's offices to view original reports but this is not possible now. My comments upon the FRA and the drainage appendices are with the caveat that I have had trouble in reading parts of the documents. I did not find the groundwater observations surprising. At 1.4.5 groundwater observations on the site from November 2019 to January 2020 showed that for those five monitoring wells the closest depth to groundwater in metres below ground level were zero, 0.20, 0.35, 0.15 and 0.15. Within the document 'Appendices drainage details' dated '20/05/2020' there is figure 002 which is an aerial photograph upon which the locations of exploratory holes are plotted but, unfortunately, I am unable to identify which hole is which. This is academic because the investigation demonstrates to me that infiltration is unlikely to be an effective way of dealing with surface water for this development.

Thus, it does not surprise me that the Applicant has followed the hierarchical approach to discount infiltration and propose disposal to a watercourse.

My reading of the documents is that the proposal is to discharge the runoff from the site to the watercourse at a controlled rate. It states that attenuation will be both using 'tanked' permeable paving and a lined attenuation pond. Achieving the 'controlled rate' with the site conditions will be challenging and the consequences of not achieving it devastating. This is without considering the conveyance capacity of the drainage system away from the southwest of the site.

The report says the 'tanked' permeable paving will be 450 mm deep and the plan within the FRA shows the attenuation basin as 1.2 metres deep. The shallow depth of groundwater from ground level (zero to 0.35 metres) mentioned above indicates to me that achieving this attenuation will be challenging. Any tanked permeable paving will have to resist groundwater upthrust since, for all of the monitoring wells, at some time, groundwater was recorded above the proposed underside of the 'tanked' permeable paving. Additionally, and even more importantly, the same will be true of the 1.2 metres deep attenuation basin. It is unclear how the developer will ensure that the attenuation pond is empty when needed for attenuation use. The drawings do not show the invert level of this attenuation basin relative to the drainage system away from the site.

In the FRA, the contoured plan (drawing D1260-PL101) indicates the topography of the site and confirms the risk it poses to the existing development to the south. 1.2.4 in the FRA describes the site as 'generally falling from the north-east to the south-west.' This topographic plan and the trial pit groundwater levels help explain the flooding of 2002 that I saw and other events seen by others.

The difference the development will create is a positive piped drainage system with elements of 'attenuation' of doubtful efficacy. This suggests to me that the rate of flow arriving at the southwest corner of the site will increase.

1.2.5 then says that with regard to the watercourse at the south of the site 'The watercourse has been confirmed to be culverted from the rear garden of No 4 Garden Close (225 mm dia), outfalling to a manhole in Arundel Road'.

Within the document, 'Appendices drainage details' dated '20/05/2020' there is an Arun District Council Plan showing the line of a pipeline (reported as 225 mm in diameter flowing from the garden of no 4 Garden Close to Arundel Road in a westerly direction through the rear gardens of Pine Trees Close and Furzeffeld Close. There are annotations on this plan.

Also within this document is an e-mail of July 2017 to Arun Engineers and WSCC as LLFA from rgp acting for the Applicant requesting drainage information.

The initial reply from Arun includes:-

'There are known watercourses (open and culverted) on the southern and western boundaries of the site. These are believed to drain to Station Road in the west. There are historical known problems with this system, especially where it is culverted through Furzeffeld Close.'

The statement about draining to Station Road suggests to me that this is via Arundel Road.

I know little of the 'receiving' surface water drainage system in Arundel Road. I recall a surface water pipeline constructed by Arun District Council from Arundel Road near to St Margaret's Primary School along Palmer Road and to a receiving watercourse to the west of the recreation ground. I am unaware of the status of this pipeline. Does surface water from Arundel Road in the vicinity drain south to Station Road, or west along Palmer Road to a tributary of the Black Ditch west of the recreation ground, or both?

There is what I assume to be a subsequent e-mail from Arun dated 5 November 2019 that contains comments on structural condition identified by a CCTV survey, which I read along with the Arun District Council Plan referred to earlier. This information puts in doubt the suitability of this pipeline to receive additional flows from this development site.

My understanding is that this pipeline is considered a culverted ordinary watercourse. The status of this pipeline is important. The Arun District Council Plan referred to earlier along with correspondence and survey results suggest this pipe is in doubtful condition and shows structures such as garages erected upon it.

Sheets 37 and 38 of Appendix E Surface Water Flood Risk Maps (2016) from Arun District Council's Level 1 SFRA demonstrate the flood risk between the this site and Arundel Road along the along northern side of Pine Trees Close and Furzeffeld Close and through the St Margaret's Primary School site and support these concerns. This mapping also shows the surface water flow path along Garden Close and Chantryfield Road which has been observed.

Water has been observed flowing out of the St Margaret's Primary School site and onto Arundel Road. It is unclear how much of the St Margaret's Primary School site has become impermeable over time.

The Application should have included full details of the downstream drainage system and confirmation of its structural and hydraulic adequacy.

I have written at length because I felt it appropriate to detail my concerns.

Primary Education

The community anticipated a new secular primary school along with the Bramley Green development many years ago and, indeed, I understand developer funding was provided and a site allocated by the Bramley Green development but nothing has been forthcoming. I note Section 106 monies have been required from subsequent developments in Angmering for primary school places. A new, two or three-form entry, secular primary school must be built and opened in Angmering, before any further residential development is permitted in Angmering.

Highway Issues

Dappers Lane is a narrow road with restricted vehicular access at its northern end and is in poor structural condition. I see that WSCC require a contribution in excess of £300,000 to 'mitigate' the impact of the development on the local highway network but for works at the A27/A280 junction and A259 improvements. I note that similar 'contributions' have been sought from other developments but don't see the road improvements. Because of the shocking condition of Dappers Lane with which this development is connected, Dappers Lane itself must be improved along with its junction with Water Lane.

Geoffrey M Gibbs

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6th July 2020