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From: Geoff Gibbs [REDACTED]

Sent: 10 May 2021 19:01

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

Cc: Angmering Parish Council [REDACTED] Katie Her [REDACTED] John Oldfield [REDACTED]

Subject: A/84/21/DOC

Dear Mr Eastham

I refer to Application A/84/21/DOC. I realise this is a Discharge of Conditions application upon which you would not normally invite public comments.

However, this has been a complex development proposal dealt with under a number of separate applications upon which I have made comments while technical proposals have changed along the way. Thus, the picture us members of the public sees is only now becoming complete. I hope, therefore, you will consider any comments made.

A most significant technical change has been to make provision for possible future attenuation of flows in the Black Ditch if a flow control device is incorporated the culvert through the embankment that will carry the vehicular access to the site. This is a change that has merit.

Throughout consideration of this planning application, my main concern has been that new development should not increase flood risk to others (the existing community) and, if possible, reduce flood risk overall. Of the Conditions that the Applicant seeks to have discharged, I have no comments to make on **Condition No 24**, namely foul water sewerage disposal.

My comments upon **Condition No 23** – maintenance and management of sustainable drainage scheme (SuDS) are:-

I commend WSCC as Lead Local Flood Authority (LLFA) for taking the initiative in promoting an attenuation scheme for flows in the Black Ditch.

It is unclear how this scheme will control Black Ditch flows. My view is that the flow control should be active rather than passive since this will permit the optimum use of available storage capacity and ensure benefits accrue where they are needed.

I am unclear as to who will operate and maintain this flow control device. My assumption is that it will be the LLFA because of their involvement to date. However, this is a Main River, where the Environment Agency would normally manage flows for flood risk purposes. Indeed this flow management structure will require permission from the Environment Agency.

Clarity is needed here.

My comments upon **Condition No 25** – discharge flows to watercourses are:-

I have particularly followed the correspondence in earlier applications about the design of the northern attenuation pond. This was originally considered before the decision to attenuate flows in the Black Ditch itself. At that earlier stage, it was correct to restrict runoff from the northern part of the site to the greenfield rate computed in accordance with Environment Agency guidance “Rainfall runoff management for developments”, Rev E 2013. Considering the matter now, pragmatically, with attenuation of Black Ditch flows just downstream of where the outflow from the northern attenuation pond would enter the Black Ditch, I now question whether the northern attenuation pond is needed. Flow restriction to afford downstream protection can be incorporated in main flow control device and any additional storage necessary easily provided by ground reshaping.

Lining ponds to resist flotation is always problematic. What seems to be proposed here is that the lining is at a level below that of the outlet and covered with granular (gravel and sand) material to resist flotation. Presumably, the lining will also retain water to the level of the outlet and thus the area could be unpleasant at times.

My comment upon **Condition No 26** – future access and maintenance of any watercourse or culvert is that it needs to be clear as to who will do what. Will the embankment upon which the access road is built and through which the culvert flows with its associated flow control equipment be a highway structure?

My comments upon **Condition No 28** – Flood Risk Assessment and surface water drainage strategy is that, because there have been so many changes it must be perfectly clear who will be responsible for what.

I am copying my observations to Angmering Parish Council.

Regards

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