



From: Geoff Gibbs [REDACTED]
Sent: 20 September 2017 15:40
To: Michael Eastham
Subject: Fwd: Objection to A/99/17/OUT

Dear Mr Eastham

Thank you for your e mail earlier today. As requested I forward my earlier e mail of 20th June 2017. The photographs I included were taken by me and I am happy for them to be used if the source is acknowledged.

There have been three notable developments since my e mail representation on 20th June:-

- On the 21st June you posted on your website, a response dated 19th June, from West Sussex County Council, who as the Lead Local Flood Authority is the statutory consultee on surface water drainage issues. This response made a recommendation of **No Objection** in this regard. I found this quite remarkable when considering the evidence presented by the Applicant and the clear responses of your Council's own engineer and the Environment Agency.
- Many further objections, mainly from concerned residents, were made to this Application after my representation.
- The powerful objection from the South Downs National Park.

I am retired but was a principal contributor to planning guidance on flood risk, British Standards, Building Regulations and other documents and have a sound understanding of how flood risk to, and especially from,

new development should be managed. Specifically I drafted much of PPS25 on development and flood risk including extending the sequential test by the provision of an exception test. Almost all of my work was incorporated into the National Planning Policy Framework. I was a member of the drafting committee for *BS 8533:2011 Assessing and managing flood risk in development – Code of practice* which is seen by many as delivering exactly what its title says. Also, I lead, for many years, the development of national guidance to develop methodologies to determine the runoff from sites such as these against which proposals for development sites such as can be judged.

Regards

Geoff Gibbs BSc MSc CEng CSci MICE MCIWEM

20th September 2017

----- Forwarded message -----

From: **Geoff Gibbs** [REDACTED]

Date: 20 June 2017 at 09:32

Subject: Objection to A/99/17/OUT

To: michael.eastham@arun.gov.uk

Planning Application Reference A/99/17/OUT

Land South of Water Lane, Angmering

I have had this brought to my attention and I **object** to this Planning Application. Very recently I made representations on your latest draft Local Plan and earlier on your HELAA consultation and in those I made it clear then 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.

This Application must be considered premature since it is part of an allocation in the Draft Local Plan and presumably recent consultation responses are still being considered by the LPA. To approve this Application before the Draft Local Plan is adopted would prejudice the examination of the Draft Local Plan and, quite frankly, make a further mockery of the whole Local Plan production process.

The 'made' Neighbourhood Plan for Angmering shows the eastern part of the site as rejected and the western part of the site is outside the settlement boundary. The Neighbourhood Plan was overwhelmingly endorsed by the community at referendum and if this Application is approved it will effectively disregard the Neighbourhood Plan.

The vehicular access to the site will create a significant traffic danger where it abuts Water Lane. Water Lane is already used as a 'rat run' by through traffic in preference to the A280 'by-pass' and the A259. The new development will also add vehicular movements to local roads particularly because of the local highway authority's extraordinary decision not to provide an unrestricted junction where Water Lane connects with the A280 'by-pass'.

The community expected a new secular primary school along with the Bramley Green development and, indeed, I understand both funding and a site were provided by the Bramley Green development but nothing has been forthcoming. A new, two form entry, secular primary school must be opened before any further residential development is permitted in Angmering.

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. We have experienced quite dreadful flooding particularly in 2002 and 2012 and do not want that to be made even worse.

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 of the 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'*. Since part of the site is Zone 3 the Exception Test should have been applied but it has not.

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. The Application should be rejected on the basis of inadequate supporting information.

On page 17 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.'

This is shocking since flooding is such an enormous risk faced by many residents of Angmering, and because WSCC, as the LLFA are 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) you should do so, immediately.

On page 21 with regard to Groundwater flood risk to the site it says:-

'The Groundshore® reports, have indicated that according to the BGS, the site has the highest susceptibility to groundwater flooding based on the underlying geological conditions and it is considered to a be potential at the surface (Clearwater Flooding), the BGS has assigned a high confidence rating to this result. However, no specific details or location are provided and the Groundshore® reports have not identified to which parcels this relates, or whether both parcels are at risk. This will nevertheless require further investigation.'

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

On page 25 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. It is surprising that this is considered 'low' when the BGS information is considered.

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

Page 27 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.'*

The FRA identifies the risk to others of fluvial and surface water flooding from the proposed development here and has earlier identified the groundwater problems but does not provide credible solutions. Thus the Application must be refused.

On page 29 the FRA divides the site into three parcels with regard to what it refers to as 'site geology'. This seems appropriate when considering how these parcels might drain. These are a western parcel, an eastern parcel (south) and an eastern parcel (north). The FRA says that:-

'i) The Western Parcel is likely to be appropriate for infiltration ii) The Eastern Parcel (South) may be appropriate for infiltration, subject to further soakage testing to confirm permeability ii) The Eastern Parcel (North) is unlikely to be 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 the three parts of the site. The application of the ICP SuDS Mean Annual Flood Method and the associated Rainfall runoff management for developments (2013) confirm that the north and south parcels of the eastern part have similar run-off characteristics and provides the appropriate methodology for determining greenfield flows and storage volumes. Elsewhere in the submitted documents it appears that an infiltration test on the northern parcel of the eastern site did not perform satisfactorily. No explanation has been provided as to why the test was not repeated or why calculations were not undertaken on an extrapolation of the results obtained. I therefore believe that infiltration for the Eastern Parcel (North) has been rejected prematurely and further investigation should be undertaken.

I believe more extensive infiltration testing needs to be undertaken prior the Application being considered. There are two reasons for this. 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.

The response to your consultation from your Council's drainage engineer confirms this hierarchical approach and confirms my concern about the infiltration investigation undertaken so far. It says:-

'Infiltration must be investigated for surface water disposal. The submitted FRA, has included some winter groundwater monitoring, but percolation tests appear to have been undertaken outside the winter period, so further winter testing will be required. Infiltration appears to have been ruled out for part of the eastern (south) section of the site – this will need to be discussed further and may need further investigation, as every effort should be made to find an infiltration option. If infiltration proves not to be feasible, then more information/investigation/discussion will be needed in respect of the existing surface water drainage system to which it is proposed to make a connection.'

I welcome this which accords with my own views (and would add that infiltration appears to have been ruled out for the eastern (north) section of the site) and the results of further investigation must be available before you determine the Application.

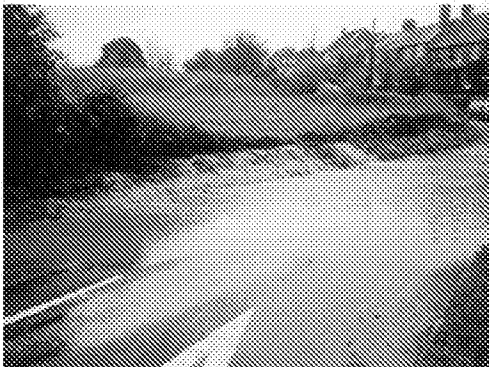
Along with infiltration any run-off from the site should be limited to the values computed by the methodology of the Rainfall runoff management for developments (2013) document. Suitable storage should be provided and discharge routed so that it does not increase flood risk to others.

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.'*

I mentioned above two particular previous flooding events. This first picture below shows flooding of the northern part of the eastern site



This second photograph below shows flood water running off the area immediately to north of the western part of the site.



The third photograph below of properties in Water Lane shows the dreadful consequences of flooding for the residents of Angmering.



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.

Please consider this **objection** seriously. I have known the area for some years and take drainage and flooding issues seriously. I have not used your on line system because I could not include the three evidence photographs.

G Gibbs

45 Chantryfield Road

ANGMERING

June 2017