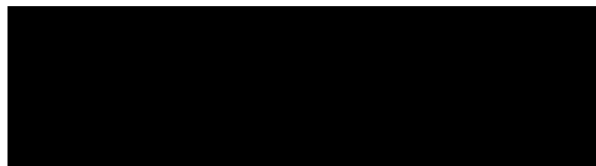




Established 1894

Angmering Parish Council

The Corner House
The Square
Angmering
West Sussex BN16 4EA



28th November 2017

Michael Eastham,
Principal Planner,
Arun District Council,
Arun Civic Centre,
Maltravers Road,
Littlehampton,
West Sussex.
BN17 5LF

Michael,

Surface Water Flooding and the Angmering North Strategic Housing Allocation

Angmering Parish Council has been very active in the evolution of the emerging Arun District Local Plan 2011-2031 having responded to the post EiP consultation and taking a full part in the recent Inspection hearings.

One of the major concerns for the Angmering Community has been the inclusion of the **Angmering North** strategic housing allocation, of at least 800 dwellings within which 725 of this total are proposed to be built on either side of Water Lane. The two sites in question are known as **North of Water Lane (550)** and **South of Water Lane (175)** and the latter is subject to an outline planning application (A/99/17/OUT).

Before this application is determined it is necessary to ensure that it fits into a Surface Water Flood Management Strategy for Angmering, dealing with local requirements for a solution to be provided as part of these developments.

1. Although there are many arguments and counter-arguments about what the base evidence for the Local Plan does or does not say, Angmering floods too regularly and work needs to be done to stop this. Development on land on either side of the ditch will increase surface water flow and, however it is achieved and irrespective of the final numbers of dwellings, work needs to be done to avoid this from worsening the situation.
2. There are a number of detailed concerns about the processes in carrying out the required flood risk analysis dealt with in the attached Appendix that need to be addressed, but the following matters need to be undertaken in relation to the South of Water Lane application & the North of Water Lane plans to ensure that a satisfactory outcome is achieved:-
3. To not determine the A/99/17/OUT application until a Surface Water Flood Management Strategy (SWFMS) is in place, as were carried out for the strategic allocations west of the Arun and documented in **Arun's Strategic Surface Water Management Study** undertaken by Mott

MacDonald. The output from **this study** was used by the **Arun's 2016 ICSDP** to assess on and offsite flood risk mitigation measures, opportunities, recommended measures and costings.

- The starting point for the SWFMS is to carry out site-specific FRA's on the two sites comprising the Angmering North strategic allocation, to identify exactly where the floods emerge from and the impact they have elsewhere.
 - To carry out the EA scheme to control the flow from the Downs before it enters the village at the A280, thereby restricting the flow at times of heavy rain. This could be funded from Section 106 contributions.
 - To engineer the site so that water flow is managed and contained within the site, flowing from north to south.
 - To engineer the site so that all water reaching the southern edge does not discharge over the highway surface, but goes under Water Lane and into the Black Ditch.
 - To engineer the Black Ditch to increase storage to contain potential flood water for longer. This would meet the NPPF requirement in **Safeguarding land from development that is required for current and future management**
 - To change the profile of the surface of Dappers Lane so that water finds its way to the ditches rather than flowing along the road surface.
 - If these matters are undertaken it should be a positive aspect to come from the developments, which would meet the NPPF objective: 'A *site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk elsewhere.*'
4. This is an important aspect of the need to define what projects are likely to come forward as part of the Infrastructure proposals to be put before the Angmering Advisory Group, but as is clear, the flooding issue is more complicated than some of the others and needs more explanation. Flood prevention is the number one priority for infrastructure delivery in Angmering.

APPENDIX

Introduction

5. The sites are referred to as 'North of Water Lane' (NOWL) and 'South of Water Lane' (SOWL). Rydon Homes have indicated that they have an interest in both sites and there is currently an outline planning application submitted for the south site, A/99/17/OUT, which Arun District Council ADC have indicated is not going to be determined until after the Inspection report is received, with further work being on the Landscape issues. The third site is Herons Farm on land owned by Persimmon. Together, they comprise the 800+ dwellings that make up the Angmering North allocation.
6. The problem of distinguishing the flooding impact of both sites needs to be considered separately as they have very different effects on the final picture. Looking at each site separately:

South of Water Lane – Although there is water flowing over the surface and into the Black Ditch, which is part of the site, this is not the main problem. The northern part of the SOWL site flows in this way, whereas the southern part flows in the opposite direction. The problem here, from a flooding perspective, is that in building the site out, there is merit in deepening the channel to allow more storage in this section of the Black Ditch and as it is on the SOWL site this will impact on the NOWL site. There is a need here to meet the NPPF requirement in **Safeguarding land from development that is required for current and future management**

North of Water Lane – This is where the majority of the water comes from as the topography of the site means that it flows from north to south and emerges at Water Lane travelling at some speed, from which the majority then turns along the highway straight towards the village centre. Not much of this floodwater makes it into the Black Ditch, so the flooding caused here does not contribute to the culvert capacity problem, but joins this on the surface at the entrance to the culvert where it meets also with that flowing down Dappers Lane adding to the overall flooding problem. In this case also the Dappers Lane flow is over the road surface.

7. In order to make sense of the current position, an attempt was made by a member of the public, Mr. Geoff Gibbs, to consider the evidence that was submitted to the Inspector by asking for details of the quoted 'Atkins Report' which took rather longer than it should have to direct him to. A copy of the email exchanges between ADCF and Geoff is attached, for reference.
8. Whilst it is accepted that access to the Local Plan examination conclusions is now not possible, the facts need to be corrected and an overall strategy needs to be drawn up.

Geoff Gibbs' Information Request

9. The Parish Clerk recently met with Geoff Gibbs and Rita Williams, also party to the email exchange, in order for them to update him on the conclusion of the email correspondence involving Geoff Gibbs, Rita Williams and Arun regarding a document (ADCED75: "Position Statement on Flood Risk" for the proposed Local Plan allocations). This document was provided to the Inspector as evidence that the Angmering North allocation had now passed the statutory Sequential and Exception tests required to ensure it was sound in regard to potential flood risk. Unfortunately, ADCED75 was published very late in the day and contained information that was "new" in terms of the conclusions reached, allowing no opportunity for it to be reviewed and commented on during the hearing. While the

conclusions reached in ADCED75 in terms of passing the sequential test were a complete change no new substantiating evidence seems to have been provided.

10. Following Geoff's review of the document, on 9th October, he emailed Arun in an attempt to understand why, when the evidence for the risk of flooding generally, and from the Black Ditch specifically, had not changed, there appeared to be conflicting data as to whether Angmering North had passed the relevant test criteria. In addition, there was now reference to an 'Atkins Report' as supporting evidence. The 'Atkins Report' referred to was not explained further and it was this that Geoff wanted access to.
11. The Parish Council unsuccessfully attempted to raise this after the hearings with the Local Plan Inspector but this email was to be sent to the Policy team on 16th October by Caroline Pattenden.
12. The concern here was that a reply was finally received on 10th November, nearly a month after the request.
13. **Why did it take so long to find something that had been presented as an important part of the evidence?**
14. **The "Atkins" Report:** has been now been confirmed by Arun as being the "Lower Tidal River Arun Flood Risk Management Strategy". Adopted by the Environment Agency (EA) in January 2014 this report predominately considers the future risk from **tidal flooding** as a result of climate change, and only peripherally considers fluvial flooding.
15. The 2014 "Atkins" report predicts that with climate change, existing flooding will be more frequent, to greater depths and for longer durations and more people and properties will flood. For Angmering it only promises to do no more than 'maintain' the current infrastructure. By "maintaining" the flood risk infrastructure within Angmering, flood risk to people and property will increase with climate change. **How does this support the apparent conclusion that doing nothing in Angmering is the best option?**
16. **The "Mott McDonald" Report:** ADCED75 ignores the findings of the later Mott McDonald report; the **Angmering Fluvial and Surface Water FAS** dated 2015; which explores in more detail the risk of flooding from the Black Ditch catchment area and especially to the built up parts of Angmering. The EA has confirmed this has become one of the most urgent projects for them. Surface water from land both north and south of Water Lane contributes to runoff into the Black Ditch and is acknowledged by the **Angmering Fluvial and Surface Water FAS** to increase risk of flooding downstream along with the inadequately culverted length. Again, this is before considering the effect of increased runoff from new development.
17. The **NPPF** says on Flooding in Paragraph 100:
"Inappropriate development in areas at risk from flooding should be avoided by directing development away from areas of highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account the effects of climate change, by:

- Applying the Sequential Test;
 - If necessary, applying the Exception Test;
 - Safeguarding land from development that is required for current and future management;
 - Using opportunities offered by new development to reduce the causes and impacts of flooding; and
 - Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.
18. The second bullet point of paragraph 102 also says:
- A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk elsewhere.
19. **Increased Flood Risk:** There is a requirement to demonstrate development will not increase flood risk to others. This can only be demonstrated by a site specific Flood Risk Assessment (FRA) at the scale of the Angmering North allocation which takes into account all sources of flooding. No such site specific FRA at the scale of the allocation appears to have been undertaken.
20. **Sequential and Exception Testing:** ADCED75 says that the Sequential Test HAS been passed, without resorting to the Exception Test. This contradicts earlier evidence provided by PEPTP9 dated February 2017, but the only explanation is a reference by Arun to a comment the EA made on the Littlehampton allocation – not Angmering – which was discussed with the EA.
21. Arun explains the contradiction by saying: “it is therefore considered that the information in each of these [reports] has not been changed, but simply presented in a different format.” None of the supporting evidence has changed, the **only change apparently being that NO has been changed to YES.**
22. Arun’s own flood mapping in PEPTP9 confirms the hazard and the EA’s Mott MacDonald report confirms how bad the risk is even before development at that location.
23. Arun advises “The conclusions for the Angmering allocation need to be read in their entirety and taken in the context of the allocation as a whole, as opposed to the specific area affected by flooding” and that PEPTP9 as a “strategic level document” and is “the starting point for any site level documents that should be produced to support more detailed proposals later in the planning process”.
24. There are SFRA’s at a broad strategic level. Site Specific FRA’s are coming forward for individual applications such as for A/99/17/OUT south of Water Lane. What is missing is the bit in the middle which is the allocation scale FRA for the whole of Angmering North considering it in its entirety, including its overall impact, that would provide the opportunity for Arun to present the supporting evidence.
25. **Flood Risk Assessment (FRA):** Not passing the Sequential Test is not the end of the world at the allocation stage. There is an Exception Test but its requirements have to be complied with. Most importantly, it has to be demonstrated that flood risk to others from the

Angmering North allocation won't increase.

26. Despite the fact that the response from Arun clearly confirms that the all of evidence upon which **they** reach this conclusion is based on assessing the allocation as a whole, an "allocation scale" FRA has not been produced because **they** do not consider it necessary. Instead, **they** will rely on separate individual FRA's for each of the 3 sites that forms part of the allocation.

The need to ensure ALL strategic development in Angmering contributes to and is engineered to manage water flows as part of a larger Flood Prevention scheme

27. The seeking out of opportunities to reduce the causes and impact of flooding downstream from the Angmering North allocation is clearly an objective of APC's Flood Risk submission to Examination, and a material consideration associated with the soundness of the Angmering North allocation and its potential to increase flood risk to others.
28. Arun's approach has been to apply a broad brush across the area they are the Local Planning Authority for. At no point has flood risk from Angmering North been considered at the allocation scale. Therefore, there is a need to ensure all strategic development in Angmering contributes to and is engineered to manage water flows as part of a single Flood Prevention scheme.
29. What is clear from all the evidence provided at Examination is that surface water runoff and groundwater issues are widespread across the District whilst the particularly affected areas in terms of flooding are specific. The FRA for A/99/17/OUT (South of Water Lane) and the response from the EA states quite clearly the risk to others.
30. The requirements of the NPPF are oft-quoted on most subjects, including flood prevention. It is important to be clear that there is no doubt that the broad proposals being put forward will at most times avoid flooding from occurring on site to the proposed development itself, but the point here is to consider the **Flood Risk to Others**, which will not be improved at all. A quote from Rydon said that it was OK because the developments would '**not make it worse**', in their view of course.
31. There needs to be clarity from Arun as to what is going to be done to resolve the ongoing flooding of Angmering Village Centre in the light of the proposed strategic development
32. It is apparent that the expectation is that new development should **improve flood risk to others**. This is possible, there are solutions to the problem and the only reason it is not being put forward is financial.
33. To put this in perspective however, just considering the two sites, North and South of Water Lane, overall turnover will be in excess of £200 million and the gross profit approaching £60 million, so not contributing to a scheme, with a net cost of less than £1 million on cost grounds only, is ridiculous. It can be done and should be.
34. The Mott McDonald (MM) Report, called **Angmering Fluvial and Surface Water FAS**, August 2015 which assesses flood risk from the Black Ditch has been ignored during the discussions to date, but the update from the EA has been that it has become one of the most urgent projects for them, with an overall costs of around £1.5 to 1.75 million, of which the 'local

community' would have to find 50%. The point of this is to reduce the flow at the worst times from the ditch before it reaches the channel next to Water Lane, thereby increasing the capacity of this to cope with the flow through the culvert and thus reduce the risk of flooding. The report confirms that

- The flood water emanates from 4 sources);
 - 1) Water Lane – Surface water run-off from land north and south of Water Lane;
 - 2) Black Ditch – Fluvial flood risk overloading the Water Lane Culvert;
 - 3) Dappers Lane – Surface water run-off emerging and going down Water Lane;
 - 4) Groom's Copse Ancient Woodland – Water run-off into Black Ditch.
- The origin of all of these sources involves runoff from rain falling on the land both north and south of Water Lane as well as from the Downs.
- At its peak, the flow from the Black Ditch cannot be accommodated through the culvert under Water Lane.
- The result is not only that the village centre and its businesses and residential property flood, but also those on Water Lane.

The Solution(s) & what has been done to date

35. The conclusions of the EA's MM report were that a large storage area should be built and a number of other smaller tasks could also be done by the local community to assist with improving the flow.
36. **Angmering Parish Council** has already worked with the EA and WSCC **Operation Watershed** scheme to undertake three fairly substantial parts of these further recommendations. It arranged for a monitoring camera to be installed (and the parish council monitors the flow) at the entrance to the culvert, has undertaken the clearing of a channel and culvert in Dappers Lane and is currently arranging for the ditch to be cleared at the outlet from the culvert.
37. Although these actions are important to the avoidance of some flooding, they do not deal with the main problems at times of heavy and continuous rainfall.
38. As included in the Angmering Parish Council responses, to both the Local Plan and the SOWL application, the SFRA and the site specific FRA for SOWL are being inappropriately applied and then the conclusions are applied to sites separately. This is important given the statement from ADC that strategic sites could come forward early, **provided that doing so did not compromise the delivery of other sites.**
39. The lack of flood reduction within the SOWL application will, by definition, potentially compromise the NOWL delivery, as the two are inextricably linked. While SFRA and a site specific FRA for the SOWL proposal have been undertaken no SFRA at the scale of the Angmering North allocation (SOWL and NOWL together) has been undertaken to support an exception test.
40. **Solution**
 - 1) The EA scheme proposed by MM to control the water flow in the Black Ditch on the other side of the A280, meaning that the channel next to Water Lane has more capacity to take the water safely from NOWL without overwhelming the culvert entrance;

- 2) To deepen the channel on SOWL to increase its capacity to store for longer
 - 3) To manage the water flowing on NOWL to arrive at the bottom of the site.
 - 4) To undertake civil engineering work to channel the water from NOWL into the Black Ditch, now with the capacity to manage it.
 - 5) To provide improved Dappers Lane flow by building better drainage, a channel to carry the water to the culvert and changing the profile of the road surface so that water flows in the ditches rather than down the road.
41. The reliance on SuDS on site is OK for managing water except when the ground is saturated, as they rely on filtration over a period of time, but as has been seen more than once on this site, and is confirmed by published information, the water table is often so high that infiltration does not happen. The result is that the water does not soak in, it flows over the surface and with hard surfacing will flow faster than it does currently over fields.
42. Torrential rain over a number of days/weeks falling on saturated ground will fill the SuDS, which will then overflow, resulting in floodwater once again ending up on the surface of Water Lane flowing down to the village centre. Or in the case of SuDs located on the southern edge of the SOWL site, potentially introducing a new flood risk by flowing south towards the High Street.
43. The assumptions in all of the work being done on this are that the weather patterns will not change with climate change. The evidence for this is that the more extreme weather events will become more common, and should be allowed for.

Yours sincerely



Rob Martin,
Clerk to Angmering Parish Council

Rob Martin

From: Rita Williams [REDACTED]
Sent: 15 November 2017 16:46
To: Rob Martin
Subject: FW: Arun District Council: Request for Information

FYI so that you have the entire email trail from Martyn White – this is the reply from Arun that I extracted the info from.

From: Martyn White [mailto:Martyn.White@arun.gov.uk]
Sent: 10 November 2017 17:36
To: 'Rita Williams'
Subject: RE: Arun District Council: Request for Information

Dear Rita,

Thank you for your e-mail. I note that it has been directed to a few colleagues within the planning department in order to find an answer, I apologise for the time it has taken for you to get a response.

I have reviewed the questions and information available to me and provide answers below.

In order to prepare a response to you I have had significant input from Charlotte Hardy, our Senior Environmental Assessment Officer.

Has (such) a flood risk assessment been undertaken and, if so, where can it be examined?

The Council has prepared an extensive evidence base related to the Arun Local Plan (ALP), including information related to flooding.

As part of the evidence base, the Council commissioned consultants to help with the preparation of a Sequential and Exception test (PEPTP9). Such a document supports the Local Plan allocations at a strategic level and is required to include sufficient detailed information relating to flood risk available at that level to cover the risk of flooding from all sources.

For the Local Plan process, due to the fact that almost half the sites being assessed for strategic use were identified by the Sequential test as being at least partially covered by some element of higher flood risk, it was considered that an Exception test should also be undertaken. The exception test was used to establish whether there would be suitable solutions available to address these risks for each location.

It should be remembered that document PEPTP9 is a strategic level document to support the ALP only. It is therefore the starting point for any site level documents that should be produced to support more detailed proposals later in the planning process. This is achieved as part of the planning application process.

This detailed work includes the preparation of Flood Risk Assessments (FRA). A FRA has been prepared for the relevant planning application (A/99/17/OUT) which will be assessed as part of the decision making process.

What is the reason for the change between the February 2017 document and the September 2017 document in this regard?

In the Sequential and Exception Test prepared to inform the Main Modifications (PEPTP9), the map at the top of the Angmering North table (on page 14 of the document) identifies the extent of the allocation being assessed, that is to say land both to the North and the South of Water Lane.

The conclusions for the Angmering allocation need to be read in their entirety and taken in the context of the allocation as a whole, as opposed to the specific area affected by flooding. Even though it begins with the word 'No' in bold it then qualifies the conclusions in the plain text contained within the same box. This text relates back to what is shown on the map and detailed within the table. For information I repeat it here:

***"No.** Minor areas in the south of the site are indicated to be situated within Flood Zones 2 and 3a. Further consideration of the risks posed by groundwater flooding is also required."*

The Environment Agency have been involved through the preparation of the Local Plan, including providing comments during periods of consultation as well as in the production of evidence base documents, such as the Sequential and Exception Test.

One of the comments from the Environment Agency in response to the Main Modifications consultation was that some of the presentation in PEPTP9 could cause some confusion. The relevant part of their comments was:

"....We note that an update to the Sequential and Exception Test has been undertaken and due to the inclusion of other site allocations in the District at this stage we do not have the same concerns as previously that lower flood risk sites were available. However, as drafted we do not believe that the Sequential and Exception Test fully reflects these conclusions. This is a matter of presentation and we are in discussion with the Council to update this." (ALPMods110)

The table and associated information for the Angmering North allocation is a good example of where the information is presented in a confusing manner.

As a result of their representation, this issue was discussed with the EA in order to find a solution. This resulted in the inclusion of the table (appendix 1) in ADCED75 (Position Statement on Flood Risk), as stated in the penultimate paragraph under the sub-section entitled 'Robustness of updated evidence base in this document'.

Appendix 1 of the Position Statement of Flood Risk (ADCED75) is also discussing the allocation as a whole and provides a broad summary at the start of the columns specifically about the amount contained in that flood zone plus, where necessary, which other sources of flooding may inform decisions and then a brief discussion about reasons as to where other sites have been included or why certain aspects may not be able to be located elsewhere.

Your attention is drawn to the paragraphs at the beginning of the first 3 columns which sets out the percentage of the overall allocation covered by each flood zone. The other columns then discuss alternates in lower flood zones and with respect to flood zone 3 broadly covers how design solutions are integrated. The 4th column is then about the vulnerability of the uses intended across the whole allocation and, as the title states the 5th column, covers the strategic need for development using the content of the SA.

It is therefore considered that the information in each of these has not been changed but simply presented in a different format.

Will you please let me know the names and job titles of those who have endorsed this document on behalf of Arun District Council, the Environment Agency and West Sussex County Council?

The names and job titles of those who dealt with the document were as follows:

On behalf of Arun District Council – Officers from the Policy and Conservation Team, and the Engineers team had direct input into the content of all of the documents:

Charlotte Hardy - Senior Environmental Assessment Officer

Roger Spencer - Engineering Services Manager

Cllr Charles signed off ADCED75 (Position Statement on Flood Risk) on behalf of the Council, on the advice of the Senior Environmental Assessment Officer.

For the Environment Agency – Mrs. Hannah Hyland, Planning Specialist

For West Sussex County Council – Mr. Kevin Macknay, Drainage Strategy Team Leader

Remaining Issues

Any remaining issues relating to the detailed planning application will need to be discussed with Michael Eastham as the case officer for the application. I believe that you have his contact details, but I include them here for your information:

Michael Eastham, Principal Planning Officer

Email: Michael.Eastham@arun.gov.uk

I hope that this information is of assistance to you.

Regards

Martyn

Martyn White : Principal Conservation Officer, Planning Policy, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37717 | External: +44 (0) 1903 737717 | E-mail: Martyn.white@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Rita Williams [<mailto:rita.williams@talktalk.net>]

Sent: 31 October 2017 14:26

To: Martyn White

Cc: Cllr. Dudley Wensley; Cllr. John Charles; Sue Bowley

Subject: RE: Arun District Council: Request for Information

Hi Martyn –

I have forwarded your email to Geoff Gibbs, but did have a quick look at the EA documents myself this morning.

I'm no expert, but the EA Lower Tidal River Arun Strategy (LTRAS) only covers tidal issues. Therefore I suspect that the reference to the Atkins report will just confuse the issue further, as it does not address the known issues of surface water and fluvial flood risk downstream from the sites which make up the Angmering North allocation. What concerns Geoff is the soundness of the sequential approach which is the combination of the sequential test and, if necessary, the exception test, and how the different outcomes for Angmering North in PEPTP9 and ADCED75 were arrived at.

As we now seem to have found the right contact, in an attempt to bring this matter to a successful conclusion can you answer the rest of Geoff's questions in his email of 9th October? I have attached to save you from having to search for it? They are as follows:

1. ADCED75 is stated to set out the areas of common ground with regard to flood risk for the Local Plan of three bodies. However the copy on the website is not signed.
Q: Will you please let me know the names and job titles of those who have endorsed this document on behalf of Arun District Council, the Environment Agency and West Sussex County Council?
2. To comply with the Exception Test requirements of the National Planning Policy Framework a site-specific flood risk assessment at the scale of the allocation must demonstrate that the development allocation will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. I see no evidence of such an allocation scale site specific flood risk assessment for the Angmering North Allocation having been undertaken.
Q: Has such a flood risk assessment been undertaken and, if so, where can it be examined?
3. In the subsequent document ADCED75 of September 2017 it is stated, for the Angmering North Allocation, that the Sequential Test is passed.
Q: What is the reason for the change between the February 2017 document and the September 2017 document in this regard?

As ADCED75 is an Arun document answering question 1 should be simple. If the officers responsible for the revised ALP are unable to provide the answers to questions 2 & 3, can they liaise with their (your) EA contact.

This will have the added benefit of improving Arun's understanding of the LP EIP supporting evidence and avoiding the additional delay that will result from a member of the public emailing them to the EA generic mailbox address which you have provided. It will be the equivalent of looking for a needle in a haystack in identifying the right individual to send them to within that organisation, let alone obtaining a fully informed answer in the context of ADCED75 and the revised ALP.

As I said, it would be helpful to all concerned to resolve this matter.

Kind Regards
Rita

From: Rita Williams [REDACTED]
Sent: 30 October 2017 20:17
To: 'Martyn.White@arun.gov.uk'
Cc: 'Cllr. Dudley Wensley'; 'Cllr.John.Charles@arun.gov.uk'; 'Sue.Bowley@arun.gov.uk'
Subject: FW: Arun District Council: Request for Information

Martyn –

Thank you for your email which Cllr Wensley kindly forwarded to me this evening.

You spelt my email address incorrectly, so I'm surprised that it didn't return an "Undeliverable – Recipient Invalid message!! Anyway, I have the link now and will forward it to Geoff Gibbs to enable him to access the elusive "Atkins" study, also known as LTRAS.

I would also like to thank Cllrs Wensley and Charles for their tireless efforts in helping to obtain access to this report.

Kind Regards
Rita

From: Cllr. Dudley Wensley [mailto:Cllr.Dudley.Wensley@arun.gov.uk]
Sent: 30 October 2017 18:31
To: Rita Williams
Subject: Fwd: Arun District Council: Request for Information

Sent from my iPhone

Begin forwarded message:

From: Martyn White <Martyn.White@arun.gov.uk>
Date: 27 October 2017 at 13:38:16 CEST
To: [REDACTED] <[REDACTED]@talktalk.net>
Cc: "Cllr. Dudley Wensley" <Cllr.Dudley.Wensley@arun.gov.uk>, "Cllr. John Charles" <Cllr.John.Charles@arun.gov.uk>, Sue Bowley <Sue.Bowley@arun.gov.uk>
Subject: FW: Arun District Council: Request for Information

Ms. Williams,

I have been asked to pass you a copy of an Atkins study referred to in Appendix 1 of document ADCED75 (Position Statement on flood risk). I have spoken to a colleague in the Environment Agency who states that this document is the Lower Tidal River Arun Strategy (LTRAS), which includes the Black Ditch and Angmering. This is a publicly available document which is located on the Environment Agency Website. The following link directs you to the relevant webpage and the documents associated with the LTRAS:

<https://www.gov.uk/government/publications/lower-tidal-river-arun-flood-risk-management-scheme>

I have been informed that additional questions can be sent direct to the environment Agency, using the following details



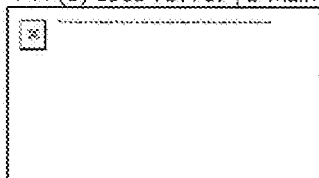
Or write to us at:
Environment Agency,
Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD.

I hope that this is of assistance to you.

Kind Regards

Martyn

Martyn White | Principal Conservation Officer, Planning Policy, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37717 | External: +44 (0) 1903 737717 | E-mail: Martyn.white@arun.gov.uk



Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

<http://www.arun.gov.uk>
NLPG UPRN 100062237016
DX 57406 Littlehampton

Important Notice This e-mail is intended exclusively for the addressee and may contain information that is confidential and/or privileged. If you are not the intended recipient (or authorised to receive it for the addressee), please notify the sender and delete the e-mail immediately; using, copying, or disclosing it to anyone else, is strictly prohibited and may be unlawful. Any views, opinions or options presented are solely those of the author and do not necessarily represent those of Arun District Council. The information in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000, therefore we cannot guarantee that we will not provide the whole or part of this e-mail to a third party. The Council reserves the right to monitor e-mails in accordance with relevant legislation. Whilst outgoing e-mails are checked for viruses, we cannot guarantee this e-mail is virus-free or has not been intercepted or changed and we do not accept liability for any damage caused. Any reference to "e-mail" in this disclaimer includes any attachments.

<http://www.arun.gov.uk>
NLPG UPRN 100062237016
DX 57406 Littlehampton

Important Notice This e-mail is intended exclusively for the addressee and may contain information that is confidential and/or privileged. If you are not the intended recipient (or authorised to receive it for the addressee), please notify the sender and delete the e-mail immediately; using, copying, or disclosing it to anyone else, is strictly prohibited and may be unlawful. Any views, opinions or options presented are solely those of the author and do not necessarily represent those of Arun District Council. The information in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000, therefore we cannot guarantee that we will not provide the whole or part of this e-mail to a third party. The Council reserves the right to monitor e-mails in accordance with relevant legislation. Whilst outgoing e-mails are checked for viruses, we cannot guarantee this e-mail is virus-free or has not been intercepted or changed and we do not accept liability for any damage caused. Any reference to "e-mail" in this disclaimer includes any attachments.