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2nd November 2023

H Booth
Smugglers Cottage
Church Lane
Pagham

Case Officer: Mr D Easton
Telephone: 01903 737500 ex37361
Email: david.easton@arun.gov.uk

Dear Sir/Madam,

The Town & Country Planning Act 1990 (as amended)
Town & country Planning (Development Management Procedure) (England) Order 2015 - Article 6

Application No: P/153/21/RES
Site Address: Land South of Summer Lane and West of Pagham Road Pagham
Description of works: Approval of reserved matters (appearance, layout, landscaping and scale) following outline planning Permission P/140/16/OUT for the erection of 350 No. dwellings, together with public open space, play space, drainage, parking and associated infrastructure, landscape, ancillary and site preparation works, with access off Pagham Road. This site may affect a Public Right of Way.

Thank you for your internet representation made on 2nd November 2023 which has been recorded as an objection with the comments as follows:

OWPC62738

As I write there is significant flooding of local roads and land in Pagham that has prevented access to houses and businesses for weeks. This is not a 'one off' event as there were similar floods in this area last winter 2022/2023:

<https://www.sussexexpress.co.uk/news/people/residents-raise-concerns-for-planned-350-home-development-in-pagham-following-dramatic-floods-4384961>

Frequent flooding in Pagham 'will only get worse if more houses are built on greenfields' ([sussexexpress.co.uk](https://www.sussexexpress.co.uk))

I have a significant concern that this new development, which will make almost 50% of the land impermeable/hardstanding, will cause a significant offsite impact from runoff.

My concern is centred on the Drainage Strategy Report prepared by Bright Plan Civils, which forms part of this reserved matters application:

a) It is based on ground investigations done 5 years ago. Recent experience indicates that findings have changed in the interim.

b) It concludes that this land is not suitable for the best method of drainage, which is infiltration, and 'second best' methods are proposed.

3. Half of these proposed 'second best' methods or SUDS techniques for draining surface water are described in section 4.1.1 as 'viable with areas of open land at the site low points adjacent to the existing ditches available'. This raises two concerns

- a) This does suggest offsite impact in the surrounding area
- b) Filter strips and swales presumably are less effective in areas such as this with high groundwater levels that make infiltration methods unsuitable

4. Previous assessment by Drainage Strategy (Ridge & Partners) found Greenfield runoff rates to be 14.2l/s and 9.3l/s for the north and south site respectively. These design rates have been reduced in this recent proposal to 12.5 and 7.8l/s.

It is unclear to me what has changed to reduce the estimated runoff rates as:

- a) from recent experience the opposite would seem more likely and
- b) a projected 45% increase in peak rainfall has, according to section 4.4.4, been taken into account.

External independent drainage engineers gave a holding objection to the development in their report dated 1/2/2023 stating that 'it is important (that) additional information relating to the calculation and attenuation basins (including the potential impact on existing watercourses) are received and reviewed to ensure there is sufficient space available in the finalised development layout to accommodate the surface water drainage needs of the development, otherwise this could increase the risk of surface water flooding both on and off site which would be unacceptable'. Some further information appears to have been received but these have not had independent expert scrutiny and, in my opinion, have not answered some of the questions raised in the 1/2/2023 report.

In summary, I feel this proposed development WILL result in an increase in runoff from the development and, therefore, an increase in flood risk offsite.

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at :<https://www.arun.gov.uk/what-happens-next>.

Some applications will be determined by the Planning Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/planning-application-search>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Planning Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website
<https://www.arun.gov.uk/privacy-policy/>

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.

To register to receive notification of planning applications in your area, please go to
<https://www1.arun.gov.uk/planning-application-finder>