

## 1.

### **Full Council Address 21.3.16**

Bill Freeman. I talk on behalf of 250 residents in North Lancing and some 5000 for Adur Floodwatch Group, an affiliation of community groups in Adur vested in the constituted West Beach Flood Action Group for which I am vice chair

I **am** actually talking on an elected basis for the community despite being called by the plan's executive member on a recent BBC programme an unelected 'do gooder' who knows nothing about drainage - then had to admit he didn't know more about the flood plain than I do.

The decision you're making on these amendments could have a life changing impact on residents in Lancing.

Every member knows the great concerns for flood risk we have with NMF. Over 1000 people said it right at start. We've said it many times since.

This site is within the Strategic Gap and Lancing Brooks network of convoluted ditches which drain into sluices by the Dog's Trust.

The whole area of Lancing relies on drainage of surface and groundwaters solely through Lancing Brooks.

In extreme weather, hundreds of thousands of gallons of groundwater from the Downs, drainage of every property in Lancing, all local roads and even the A27 rely upon this 1 in 2000, no gradient, virtually flat outflow into the River - which is tidal with drainage through sluices only when the tide's out.

County's CH2MHill drainage study published last October clearly points up the fragility of the whole area and says -

1) In extreme weather conditions, no matter what mitigation measures are taken, Lancing will always be vulnerable to flooding from groundwater

It also says:

2) Lancing Brooks ditch network is at under capacity for the drainage required for the area.

Despite all that, we still have this allocation in the vital flooding containment area of the Gap – 80+ acres of concrete infill - all proposed in the Plan with still no real proof of sustainable drainage.

For the 4<sup>th</sup> winter Lancing's had seven weeks of flooded gardens, loss of sewers, road and lane closures, overpumping into ditches, tankering because of extremely high ground water levels. It happens every year now.

God forbid we ever have the weather they had in the North!

## 2.

In Winter 12/13, just as sewer levels were reducing, as soon as sluice gates closed a mile and a half away - back up came the levels – that's how sensitive and connected this whole containment area is.

And Adur's leaving the drainage scheme to the development application stage. It won't do the developer's job for them!

How can this be the case when the decision to include NMF hasn't followed flood risk rules of Govt's NPPF for such exception sites.–.

Rule 102 states the authority must demonstrate – I'll repeat, **must demonstrate** the development must be safe for its lifetime and have no increase of flood risk for 1<sup>st</sup> or 3<sup>rd</sup> parties **before** the allocation's set in the plan. It should where possible reduce flood risk.

The flood risk assessment fails to demonstrate that requirement. It suggests surface water drainage could be managed into the under capacity ditches.

CPRE's expert drainage report in 2014 clearly points out no matter what build methods are used, management of surface water run off from the site should be done totally separate to the existing ditch network.

The County study findings on the under capacity ditches underpin that.

The findings of these informative documents haven't been acted on appropriately

Despite all that expert comment – we still have surface drainage into the ditches!

The major problem here is groundwater flooding. It's not river or coastal. The plan's documents fail to address that risk.

The whole area from the River westwards has a >75% risk of groundwater flooding. **That's the issue not to make worse.**

Tidal walls make absolutely no difference to this high level flood risk.

**At the very least, to comply with rule 102, full, specific drainage feasibility must be carried out before the allocation's set in the plan - demonstrating absolute methods to be taken with support of full data on capacities, flows, drainage influences and effects to justify it would work.**

Not an assessment which pays lip service to the requirement with no 'how' and 'why' quantified solution.

And from an 'on record' meeting in November 2014, the authority does know this level of report's needed. They'd tried unsuccessfully to have the developer provide one. He refused to spend further money commissioning it.

### 3.

It'll cost money – but it'll cost a lot more if it isn't done.

You can't leave this fundamental, risk laden part of infrastructure on such a site to a developer whose motive, fairly, is to build, sell, make profit and walk away.

We believe there may be no foolproof, viable solution. NMF should be deleted from the plan.

However, this evening, we ask members not to approve these plan amendments until, **at the very least**, the authority's done the work to demonstrate mitigation methods with full data support to meet Rule 102.

If this isn't done, we see this as a lack of due diligence. Put it stronger, the authority may be negligent in not taking care of its community.

I thank you for listening and ask the chair, that my comments be logged on the Local Plan File for Government viewing when submitted.

My question to full council is:-

**To comply with rule 102 of the NPPF, will the authority reconsider undertaking a fully quantified drainage scheme for management of surface water run off for New Monks Farm to justify mitigation of flood risk is possible before setting this allocation in the plan?**

Ends./

#### **Observations on the meeting**

There was a full gallery of community in attendance. Total disruption when I began my address. The chair stopped me and insisted I must only ask the permitted presubmitted questions. I refused and continually insisted for at least 2 minutes that democratically under the terms of the meeting I was entitled to address the committee for 5 minutes. Lots of angry dissent from the gallery. Eventually, the deputy leader intervened and asked the chair extend the public session and I give my address. So, I restarted from the top.

Needless to say the amended NMF allocation got nodded through by the incumbent majority for public consultation!

BBC & Press were present and a recording of the debacle was heard on BBC Sussex news and breakfast show the next morning.