



Chris Banks <bankssolutionsuk@gmail.com>

Fwd: Pre-Application Query: Tully De'Ath Flood Risk Assessment Issue 4- New Salts Farm – Shoreham 11649 For The Hyde Group

Forwarded

Ben Daines <ben.daines@adur-worthing.gov.uk>
To: Chris Banks <bankssolutionsuk@gmail.com>

31 January 2017 at 13:26

Chris,

Further to the comments received from West Sussex County Council and the Environment Agency yesterday, please also find comments from Ken Argent, Adur District Council's engineer regarding the New Salts Farm Flood Risk Assessment. I assume you will number this up as an Adur District Council response.

Thanks,

Ben Daines

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

From: Ken Argent <[REDACTED]>

Date: 31 January 2017 at 10:25

Subject: Re: Pre-Application Query: Tully De'Ath Flood Risk Assessment Issue 4- New Salts Farm – Shoreham 11649 For The Hyde Group

To: Ben Daines <ben.daines@adur-worthing.gov.uk>

Ben,

I have read the Submission, and am now in a position to comment upon its content. I am afraid I am no more positive about the document than my colleagues at WSCC and the EA both of whom have already commented back to you.

It is interesting that many of the items raised and minuted from the 27th June meeting have remained un-actioned by Hyde. Item 3.3 on the minutes requires both north and south ditches to be modelled, However,

Paragraph 1.2 of the FRA Version 4 states *The purpose of the report is to demonstrate to the Planners, the Environment Agency (EA) and West Sussex County Council as Lead Local Flood Authority that the proposed development is subject to an acceptable level of flood risk and should not increase the likelihood of flooding elsewhere.* The document does not consider this and indeed at paragraph 5.3 it states *Much of the catchment to the north of the site was not included as part of the analysis as it would not contribute to the flooding on the site,*

Paragraph 3.6 of the FRA Version 4 states that ground water levels were recorded for a maximum of 11 months, during which time one recorder failed for 3 months and a second for one month, a further 4 wells were installed but monitored for 3 months. This is hardly a complete study. However the fact that WLS5 was subjected to artesian flooding and WLS6 flooded to surface level twice – appears to cause very little concern. Interesting that the data on FIGURE 5 does not show the two events mentioned.

Fig 2 J12495 Depicts ground water levels these appear to show that ground water levels peak two hours after high tide, except in WS1. This has been assessed "and is probably unaffected by tidal action" I would suggest that the ground water level at this location is directly influenced by its proximity to the ditch, a small increase in recorded level is clearly seen, is it more likely that this small peak would coincide with backflow as the tide flaps close.

I attach 2 photographs taken in 2015 one is near the Location of WLS111 the second slightly west of WLS109, both would tend to show that the data loggers have not been exposed to a wet winter. Note this is post ditch clearance – so the ditches were in a good clear condition.

Paragraph 3.7 *Why was the data logger not replaced? It is also stated here that All recorded levels remained in-channel with the exception of one event in Ditch 3 where the water level was recorded just above the bank level. The same event created a similar 200mm rise in water level within Ditch 3, clearly an error.*

The data logger was installed at The Road Bridge, this location was clearly identified as a pinch point on the drainage system, Hyde acknowledged that they were the riparian owners of the ditch at this point and this was minuted at minute 4.5, No action to improve conditions was taken.

Whilst I do not dispute that the Pynford Housedeck system, is specifically designed for areas with poor ground conditions, nowhere in the literature does it say that the para 6.4 statement localized interstitial mixing of soil particles and the cement paste occurs at the soil/pile interface. This means that in the final case there is no preferential pathway for water migration in the long term, is suitable for tidally influenced artesian pressure.

Issues concerning Safe egress have been identified by others

Issues concerning Foul Sewer capacities, once they incorporate Monks Farm Flows have been identified by others.

Water butts are frequently mentioned, these may retain water in the summer, but who empties their butts during the winter, when it rains? Their capacity should be ignored.

Permeable paving and the use of geocells for road construction has been questioned previously Suds drainage systems should have 1m between ground water levels and the underside of drainage layers (soakaways). Clearly that's not feasible here.

Figure 6 J12495 depicts ground water levels at three locations and shows the tidal lag between high tide and ground water level. It should also be pointed out here that whilst Southern Water confirm that actual rainfall was almost twice the long term average for the month of January a 4.94 m tide is not a spring tide indeed it is almost the lowest high tide level achievable all year. Why was the graph for Monday 10th January when the predicted high tide level was 6.1m not be provided

Ken Argent

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