

Adur Floodwatch Group

Run by the community for the community

5 Manor Way
Lancing
BN15 0QU

Tel: 01903 766477
Email: katbill@talktalk.net

Mr. Chris Banks
C/O Banks Solutions
64 Lavinia Way
East Preston
West Sussex
BN16 1EF

Homework Questions Day 3, Issue 3, New Monks Farm, Policy No 5

18th April 2017

Dear Mr Banks,

Here are our further comments in respect of the above responses to the Inspector by Adur DC.

ALP/025/R

Make reference to a long term maintenance and management strategy, policy 5.

Responding to the authority's response to this homework question, if New Monks Farm proceeds as an allocation, we support the council's wording that developers must work with the various drainage bodies to ensure that all aspects of flooding are not worsened elsewhere.

Nevertheless, Adur Floodwatch Group once again requests that a site specific FRA is undertaken to provide evidence of drainage sustainability for the Inspector's approval of this allocation to comply fully with the exception test NPPF para 102.

We are totally in agreement that any FRA must take into account all the evidence and information contained within the Lead Drainage Authority's 2015 Drainage Study by CH2MHill.

In terms of the Council's additional wording :-

'and must also set out a strategy for the long term management and maintenance of drainage on the site.'

We feel this needs strengthening considerably and the following should be included in this part of the policy:-

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'To ensure that there are future safeguards to guarantee this vital ditch maintenance and drainage infrastructure for the lifetime of the development (and to protect financially whatever drainage authority has flood risk responsibility), in the event of financial failure of any current or future site owner or specially set up maintenance company or subcontractor for the ditch maintenance, on planning approval of the New Monks Farm development, the applicant will be conditioned to set up an 'On Demand Performance Bond'.

This should be organised with an appropriate bank or financial body.

In the event of a financial failure of any organisation responsible for the ditch maintenance, this bond would provide instant access to funds for the community with support of the Local Authority to ensure that this vital maintenance continues to minimise the flooding risks to both offsite and onsite properties and local infrastructure.'

To calculate the level of monies for the Bond, a good starting point is the recommendations with costings shown for this work and its frequency in the 2015 CH2MHill report by the WSCC lead drainage authority. A copy of the report is attached with this link to the appendix (large file).

https://www.westsussex.gov.uk/media/6213/lancing_swmp_appendices_a-h.pdf

The appendix includes maintenance costs as at 2015 for the New Monks Farm ditch network.

An additional measure for inclusion in Policy 5 wording

The WSCC lead drainage authority's CH2MHill drainage study for Lancing made recommendations with options and costings to improve as far as is possible, the current drainage of the area, the ditches, the culverts, access manholes, pinch points etc. of the surface water drainage identified throughout the area. These improvements did not take into account the impact of any future development in the area, only what existed currently.

These recommended improvements still have not been planned or put into place.

AFG strongly requests that the council declares in this policy that:-

'S106 monies derived from the New Monks Farm site will be used to put into place all the drainage improvement works recommended by the WSCC CH2MHill report as the first priority from this S106 fund and will also seek to even improve on these recommendations in the light of the community's concerns for increased drainage issues. This work will be undertaken in consultation with relevant community groups where these improvements apply.'

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Once again, options and their costings as at September 2015 are scheduled in the linked appendix. The respective drainage officers for WSCC, Adur and the Environment Agency could advise on the best options when appropriate.

**Day 5, Issue 5, Hyde Homes, Steyning Road Sites
ALP/025/FF (ALP/025/D)**

Continue communication with Hyde Homes re New Salts Farm in order to fully understand whether an acceptable flood mitigation and drainage scheme can be achieved for the site.

In respect of the lead drainage authority and Adur DC's engineers' concerns, we can only support their pursuance of a proven drainage scheme for the New Salts Farm site which we ultimately believe, with its history of groundwater flooding, if developed, will be an increased risk of flooding for all existing residential areas which the Lancing Brooks serves to drain, particularly West Beach (Hasler) north of the A259 to the west. So, we support their concerns.

Particularly with the tide lock characteristics of the Lancing Brooks, there is much evidence that this site should be permitted to flood in extreme weather to protect all existing upstream developments to the west and north of this exception site. (In real terms, the same logic should apply to the New Monks Farm site which historically has been the relief area to particularly the Lancing properties upstream to the west and the A27 trunk road and downstream to the south.. The Lancing Brooks is the only ditch line for drainage into the river/sea to serve and protect some 10,000 residents against flooding in extreme weather for the Lancing conurbation.)

Can the Council provide a schedule of updates in relation to ongoing work on Omission sites regarding flood risk and details of consultation responses for the current planning application for residential development at Steyning Road site.

For the Steyning Road site we note that all the drainage agencies are concerned about the pumping method being proposed by the site promoter. It should be noted, that the site has an Environment Agency Zone 3 risk from river flooding and like the NMF site to the west has a >75% risk of groundwater flooding. Examining the plans for the Tidal Walls Scheme, the dog leg of construction which continues the tidal wall across the site to meet the A283 completely cuts the site in half leaving the part that is closest to the Shoreham flyover unprotected from the scheme.

We also support the Authority's and National Park's concerns to do with landscape and setting if this site is developed.

Kind Regards,



Bill Freeman
Chair