

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 03 February 2022 10:48

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Cc: Anita Gardner <Anita.Gardner@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>

Subject: RE: Planning Consultation on: AB/136/21/PL

Engineers Comments Regarding Surface Water Drainage

The FRA for this application appears to have significant omissions and errors. Part of the application site (where part of the proposed dwelling is proposed) appears to be classified as functional flood plain Flood Zone 3b ([Arun SFRA mapping](#), sheet 45 of 46).

I have also attached a map which clearly shows that the east and south-eastern corner of the site are within the extents of Flood Zone 3b. Please ensure that the Environment Agency (EA) are made aware of this. Please also consider that this is land "where water has to flow or be stored in times of flood. This zone is generally defined as the land which would flood with an annual probability of 1 in 20 (5% AEP) or greater in any year" (this is the case for the Arun District). Only water-compatible uses and the essential infrastructure that has to be there should be permitted. As the development is for "More Vulnerable" use as a dwelling house, [Table 3 Flood Risk Vulnerability and Flood Zone 'compatibility'](#) shows that **development should not be permitted.**

In addition, the FRA does not include a Sequential Test, therefore the applicant has not shown that it is not possible for the development to be located in zones of lower probability of flooding. The Exception Test in the FRA does not attempt to demonstrate that the development provides wider sustainability benefits to the community that outweigh flood risk.

It is worth highlighting that in a defended scenario the flood levels for a 1 in 200 tidal flood event vary from 1.2m to 2.3m (2.05m at the buildings) in depth on the site. The FRA acknowledges that dry and safe access and egress will not be available in this event, paragraph 154 of the NPPF states that new development should be planned for in ways that: avoid increased vulnerability to the range of impacts arising from climate change. This proposed development does not appear to do that.

The FRA argues that compensatory flood storage would not be required, we would dispute this. The construction of the new dwellings within the floodplain has the potential to displace water and to increase risk of flooding elsewhere.

As the site is wholly located within Flood Zones 3a and 3b, designing a sustainable surface water drainage system will be challenging. SuDS should not be located in functional flood plain and we avoid locating SUDS in Flood Zone 3 as the drainage features will likely become inundated with fluvial water and in this case tidal flood water.

No groundwater monitoring has been undertaken for the site, however we would expect groundwater to be high and this will influence flood risk and the drainage strategy. The applicant should be aware that we expect a climate change allowance of 40% (not 30%) to be applied to rainfall intensity. An Activity Permit will be required from the EA to connect flows to this watercourse as it is located in an Internal Drainage District (IDD).

On the basis of the above I wish to **object** to this application. I do not believe enough evidence has been supplied to show that flood risk will not be increased on or off-site as a result of the development, nor that it has been proven that this is an appropriate location for development through the application of the sequential test.

In order to overcome my objection the FRA would need to be updated to account for the omissions and discrepancies described above. Furthermore, I would expect all surface water drainage design to be agreed prior to determination, with appropriate winter groundwater monitoring and infiltration testing. The surface water drainage design would have to show that flooding would not be increased on-site or off-site for the lifetime of the development with appropriate allowances made for climate change and urban creep.

If you are minded to approve the application, despite my objection, I would ask that the following conditions are applied to attempt to minimise the likely increase in flood risk on or off-site as a result of the development.

PCENG D2

"Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity."

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

And the accompanying informative:

INFORM D

"Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm event plus 40% on stored volumes (allowance for climate change) between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the

1 in 100 year storm event plus 40% on stored volumes. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers.

Supplementary guidance notes regarding surface water drainage are located here [Council on Arun District Councils website](#). A surface water drainage checklist is available on Arun District Councils website, this should be submitted with a Discharge of Conditions Application."

Kind regards

Sarah Burrow
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Current working pattern: Monday-Wednesday 8am-2:30pm, Thursday 8am-5pm, Friday 8am-11:30am.

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 10 January 2022 11:19

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: AB/136/21/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: AB/136/21/PL

Registered: 7th January 2022

Site Address: Land Adjacent 18 Queens Lane Arundel BN18 9JN

Grid Reference: 501963 106820

Description of Works: Demolition of garage and erection of two dwellings with associated car parking and landscaping. This application is in CIL Zone 2 and is CIL liable as new dwellings.

The Council have received the above application.

[Click here to view the application details](#)

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 10th February 2022 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Mrs A Gardner

Planning Officer- Arun District Council

Telephone: 01903 737529

Email: Anita.Gardner@arun.gov.uk

PLCONSULT (COB) 2020