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

Sent: 07 June 2022 15:45

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

Cc: Amber Willard <Amber.Willard@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

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

Engineers Comments Regarding Surface Water Drainage

An updated FRA and Sequential test have been supplied following objections from myself and the Environment Agency (EA). As a result the EA have lifted their objection and requested that conditions are applied should the application be approved. Given that it is the EA's remit to consult on flood risk I shall defer to them on that element. It is expected that the Planning Officer will assess the adequacy of the sequential test and whether or not the proposed scheme provides wider sustainability benefits to the community that outweigh the flood risk. Neither of these aspects are normally considered by the EA.

As the site is wholly located within Flood Zones 3, designing a sustainable surface water drainage system will be challenging. 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 climate change allowances have been adjusted and we now expect a climate change allowance of 45% to be applied to rainfall intensity for a 1 in 100 year event. 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).

The applicant has provided a high level surface water drainage strategy, in which they proposed to attenuate surface water in permeable paving with a 600mm sub-base. The strategy has not been analysed in detail as it is not supported with site specific groundwater monitoring or infiltration testing. However, I note that there is a large tree shown on the drainage layout in close proximity to the proposed permeable paving. The same tree does not appear to be shown on the existing site plan or the proposed site plan, however, if it's presence is confirmed it will likely conflict with the surface water drainage strategy. This will need to be investigated further with the assistance of the Tree Officer if you are minded to approve the application.

I would have preferred all surface water drainage to be agreed prior to determination, however, given that the applicant has overcome the EA objection, has supplied a high level strategy showing that there is likely enough space on the site for surface water drainage, and that there is not enough time before the determination deadline to agree a detailed design I will accept this being approved via the following condition if you are minded to approve the application.

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 infiltration tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method. All design storms must include a climate change allowance, as per <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>, on stored volumes or rainfall intensity. Infiltration structures must cater for the critical 1 in 10 year storm event, (plus 40%) between the invert of the entry pipe to the soakaway and the base of the structure. All surface water drainage designs must also have provision to ensure there is capacity in the system to contain the critical 1 in 100 year storm event (plus 45%).

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 groundwater table in support of the design. The applicant is advised to discuss the extend of ground water monitoring with the council's engineers.

Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application."

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services



Current working pattern: Monday-Friday: 8am - 2:30pm

Arun District Council, Civic Centre, Maltrovers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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

Sent: 12 May 2022 13:19

To: Land Drainage [REDACTED]

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

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: AB/136/21/PL

Registered: 7th January 2022

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

Grid Reference: 501963 106820

Category: Plan Applicat'n

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.

I am able to inform you that I have received an amendment to the above application dated 12th May 2022 relating to:- Revised FRA and sequential test

[Click here to view the plans and documents](#)

If you should wish to make further representations as a result of this amendment you should click the link below and then click on 'Enter comment'.

[Click here to make further comments](#)

Please make any further comment by **6th June 2022**.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Amber Willard

Planning Case Officer- Arun District Council

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Email: amber.willard@arun.gov.uk

PLRECON (ODS) 2018