



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

To register to receive notification of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>

Sign up to our newsletter [here](#)



From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 23 December 2021 13:38

To: Simon Davis <Simon.Davis@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>

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

Subject: RE: AL/126/21/PL Ryfield's Farmhouse

Hi Simon

For whatever reason we can find no record of this consultation, however;

The foul drainage is a matter for Southern Water but I agree it is sensible to impose a condition preventing occupation until the downstream foul system on the adjoining development is constructed and operational. This should be discussed and agreed with Southern Water who will ultimately need to discharge the condition.

In terms of surface water disposal and the need to ensure that the downstream system is in place and operational, a pre-occupation condition should not be applied, as flows are not related to occupants within the properties but relative to rainfall. Essentially, if the downstream system is not in place before the Ryfield's surface water drainage system is constructed (and receiving flows) then flooding is likely to occur. I have discussed this further below.

My consultation response below is to back up what you have already said (with exception to the pre-occupation condition which is not relevant to surface water drainage);

Engineers comments on surface water drainage;

It is now recognised that surface water will be discharged to the proposed surface water drainage system on the adjoining development to the south. I understand that discussions are in motion between the relevant developers but it is unclear as to how far this has progressed but is essential to the master planning.

It is critical that the adjoining developments drainage scheme is designed to accommodate the proposed flows from this development (potential flows will be assessed as part of future discharge of condition application). **A suitable condition (applicable to both developments) will need to be drawn up and agreed to cover this aspect.**

Equally, it is critical that the relevant sections of the adjoining developments surface water drainage system are constructed to provide a means of accepting flows from Ryfield's, and ultimately discharging to the watercourse (main river). **A suitable condition will need to be drawn up and agreed to cover this aspect and must ensure that before any flows are received into Ryfield's surface water drainage system/impermeable areas created, that the relevant aspects of the downstream system on the adjoining development has been constructed and are fully operational.** This is to ensure that there is no increase in flood risk as a result of differing timescales for the developments.

Please could you also apply the following conditions (**PCENG2 and informative modified**);

PCENG2

"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:

INFORM2

~~"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 BRE 365, 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 [Drainage Planning Consultations 1](#) Arun District 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."

PCENG4 (NB. Used where a development consists of 5 or more properties)

"Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual."

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.

The developer will be encouraged to incorporate permeable paving within the development to help provide attenuation and water treatment. Please note that the current drainage scheme does not indicate any presence of permeable paving.

Hope this all makes sense.

Regards

Paul Cann
Principal Drainage Engineer
Engineering Services

T: 01903 737819

E: paul.cann@arun.gov.uk

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



Sign up to our newsletter [here](#)



From: Simon Davis <Simon.Davis@arun.gov.uk>

Sent: 23 December 2021 11:21

To: Paul Cann <Paul.Cann@arun.gov.uk>

Subject: AL/126/21/PL Ryefields Farmhouse

Hi Paul,

As discussed just now with Sarah. This app was reallocated to me from James in December and the drainage consultation is overdue. I have already written 99% of the report as it is due 03/01/22 but I can't issue before Xmas due to Site Notices having gone up late and expiring over the Xmas break. I am intending to determine early in January when I am back. This is what I have said in my report about drainage:

The applicant demonstrated on the previous application that groundwater monitoring and infiltration testing had shown that infiltration as a means of surface water disposal is not viable (due to high groundwater levels). The same level of details has not been provided on this application (the submitted DAS states that a drainage strategy will be submitted imminently but has not so far been provided) but it is material that this position was accepted previously.

The hierarchy for sustainable drainage states that if infiltration is not viable then discharge to a watercourse should be investigated, followed by discharge to a surface water sewer, and then a combined sewer where there are absolutely no other options. The application previously showed a pumped surface and foul system to the existing public foul sewer on Oak Tree Lane.

This was considered unacceptable as WSCC SuDS policy 2 states that "surface water must not be discharged into the foul sewer system". In addition, in this particular location, the addition of surface water to the foul sewer is likely to increase sewer flood risk to properties/roads and increased pollution to watercourses within the Lidsey Treatment Catchment. Pumped solutions are also not considered to be sustainable (with reference to WSCC SuDS policy 3) due to the risk of failure and consequential increased risk of onsite surface water flooding as a result of such failure.

The applicant instead now proposes separate gravity fed surface & foul connections into the proposed development on the adjacent land to the south east. This development has not yet been approved but is the subject of a current application and is also within the BEW area. Should this application be approved then conditions could be imposed to prevent commencement until the design of the surface and foul drainage systems had been agreed. Conditions could also be imposed to prevent occupation of the

dwellings until the agreed drainage systems had been put in place and, crucially, connected to the adjacent development. Otherwise, a situation could result where the houses simply drain to ground.

Thanks.

Simon J Davis MRTPI
Principal Planning Officer
Directorate of Place

T: 01903 737874
E: simon.davis@arun.gov.uk



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

To register to receive notification of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>

Arun is a CIL Charging Authority, for more information go to www.arun.gov.uk/cil
Sign up to our newsletter [here](#)

