



**Harvests
Norton Lane
Norton
Chichester
West Sussex
PO20 3NH**

29th June 2026

Dear Sir or Madam

Objection to Planning Application – AL/20/26/PL – DRAINAGE

Please accept this letter as an addendum to my letter of objection of 28th April 2026 in particular Section '3.6) Surface Water Drainage' and my subsequent letter with additional evidence of 20th May 2026.

My points below relate to the 'Engineer's Response' regarding Surface Water Drainage posted on the 23.06.26.

I also refer to the document 'FRA/Drainage Statement/Foul Drainage Impact Assessment Rev P05' posted on 15.06.26. Title – 'Flood Risk Assessment/Drainage Statement/Foul Drainage Impact Assessment'

'Flood Risk Assessment/Drainage Statement/Foul Drainage Impact Assessment' – posted 15.06.26

Looking at the FRA document first;

On page 17 we have the statement;

2.5.2 Winter groundwater monitoring will be carried out during the peak groundwater levels months.

This has clearly not been done as the monitoring finished in late January 2026 whereas the peak is likely to be in March.

On page 20 we have the statement;

- 4.1.10 BRE 365 soakage testing was carried out in the location of the soakaway at 2.2m depth. Three pours were undertaken and completed. For the testing output data, **refer to Appendix F**. See below for results.

These tests were carried out at 2.2m depth which is not at the soakaway level and hence inadequate. This inadequacy is acknowledged by the Applicant's Agent as further down in 4.1.10 we have;

Further infiltration was carried out on 10th June 2026 at a depth of 900mm which represents the new base of soakaway level following winter ground monitoring being carried out at the site. The further testing conforms with the BRE 365 method as per previous infiltration testing undertaken at the site. For the testing output data, refer to **Appendix F**. See below for results.

These tests may well be at a more appropriate level but they were carried out in June 2026 in very dry conditions. It would be more appropriate to carry out such tests over the winter period to March when groundwater levels would be at their highest.

One of the conclusions of the report states;

- 8.1.6 Exceedance routing has been designed as such there are no existing, proposed or third party land at risk following the event of failure in the system or storms greater than 1:100yr +45% climate change event.

In an email from the Applicant's Agent to the Case Officer of 24.06.26 we have the statement;

'In this instance, any rainfall event exceeding the 1:100+45% Climate Change event will flood in the southernmost parking bays at the site's low end. The hydraulic model confirms this. If the flood level breaches the kerb height of the parking bays, any volume of water would flow above ground across soft landscaping towards the site boundary.'

These two extracts are not consistent; one says 'there are no existing, proposed or third party land at risk' whereas the second says 'any volume of water would flow above ground across soft landscaping towards the site boundary' (see notes on the existing situation below).

From my letter of 20th May providing additional evidence it is quite evident that off-site flooding already occurs via this route and the proposed development will only exacerbate this problem. The still image below is taken at the rear (Southern aspect) of the existing West Barn looking across neighbouring property only a few metres from the boundary.

Unfortunately, no photographs were taken of the 2026 flooding but please find below a still image from a video filmed on 1st January 2024 (see date stamp).



Turning to the issue of foul drainage there is a complete contradiction in the report;

On page 17 we have;

- 2.4.3 A foul sewer is located in Norton Lane picking up existing properties prior to connecting into a sewer located on Norton Road. The Tangmere wastewater treatment works is approximately 1 mile downstream.

Whereas on page 27 we have;

- 7.1.1 Arun District Council pre planning advice dated 12/06/2025 confirms the site is located within the Lidsey treatment catchment area.
- 7.1.2 The Lidsey catchment area is known historically to have issues with flooding associated with surface water entering the foul sewers.

The Lidsey catchment discharges to Lidsey wastewater treatment works.

The assessment appears confused regarding which wastewater treatment works is the recipient of the West Barn site's wastewater. Is it Tangmere WwTW or Lidsey WwTW? The available capacities at the two sites could make this a material issue.

Turning to building occupancy, on page 27 we have the following calculation;

- 7.1.5 The new building is said to have maximum 10 people operating within it at peak times. More often than not 5 persons will be occupying the building.

Using the British Water Flows and Loads 4 the following foul flows from the new development have been determined as follows. Calculations below are based on 10 persons using the new office building per day.

Per person /activity / day

Therefore:

$$10 \times 50 = 500$$

$$500 / 86400 = 5.787 \times 10^{-3}$$

Say – **0.00578 l/s**

These occupancy figures are taken from the former refused Application AI/107/26/PL. However, this application was based on a proposition that this was a local business with an existing presence on site (Biodot Ltd) wishing to extend their footprint to facilitate business expansion. The Applicant (Biodot Ltd) predicted five additional employees.

The current Application AL/20/26/PL is significantly different in that it is no longer an application in the name of Biodot Ltd. The narrative that this is a local business wishing to expand has been withdrawn. Hence this is a speculative development in the name of the land owner. There is no guarantee of occupancy rates from such a speculative development which has a footprint of 540m² and two stories.

‘Engineers Comments Regarding Surface Water Drainage’ – posted 23.06.26

Section 1.6 highlights the issue that the more recent tests in June have not been carried out at an appropriate time of year i.e. in the Winter / Spring when groundwater levels are at their highest. A simple extrapolation from June data carries significant risks.

- 1.6. A further round of infiltration testing has been conducted at the correct depth but does not comply with the BRE365 test method which is to undertake testing in Winter or Spring when groundwater levels are high. However, the results show good rates of infiltration in the shallower subsoil.

Moving on to later points;

- 1.3. A ground investigation has been provided which includes winter groundwater monitoring up to the end of January 2026 and it is stated in the ground investigation report that groundwater levels are increasing up to a likely seasonal maximum in March. The current scope of the groundwater monitoring was previously agreed with ADC as part of pre-application enquiry.
- 1.4. The proposed soakaway has been adjusted to be larger in plan and less deep to mitigate the risk of high ground water. The highest groundwater level for the current data is 2.2m below ground level. The proposed soakaway is approximately 0.8-0.9m below existing ground levels. The base therefore has a margin of buffer before the 1m vertical offset which is acceptable on a precautionary basis to mitigate the possibility that the annual peak had not been fully reached at the end of the groundwater monitoring.
- 1.5. The previous infiltration testing was carried out at 2.2m bgl with a starting head of 0.9m at the trial pit logs show different stratum (Harwich Formation) at that depth to the Head material at 1 metre depth. It therefore cannot be applied to the design infiltration rate as representative of the receiving subsoil at 0.8m bgl and above.
- 1.6. A further round of infiltration testing has been conducted at the correct depth but does not comply with the BRE365 test method which is to undertake testing in Winter or Spring when groundwater levels are high. However, the results show good rates of infiltration in the shallower subsoil.

This reinforces the key issue that testing has not been conducted at the appropriate time i.e. when groundwater levels are at their highest. It is somewhat unfortunate that the Applicant received apparently inappropriate advice from ADC in a pre-application enquiry. To rectify and overcome this inappropriate advice / agreement a period on winter groundwater monitoring should be undertaken to include the period when groundwater levels are at their highest (March).

Section 8.2 is very relevant here;

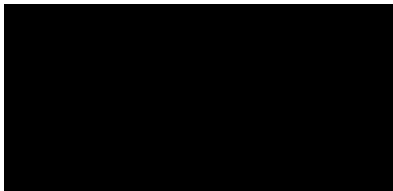
8.2. The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.

The introduction of a 540m² new commercial building will only create additional pressures on a landscape where a neighbouring property is already the subject of surface water flooding.

I trust that the Case Officer will take this evidence into account alongside my objection letter of 28th April and subsequent letter of 20th May when making his recommendation.

It would be very helpful if you could re consult with your drainage engineering consultants on the points I raise here.

Yours faithfully



John J Spence

PL- Rep

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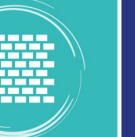
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Sent: 06 July 2026 11:47
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: DRAINAGE CONCERNS - Application AL/20/26/PL

Objection

Kind Regards

Simon

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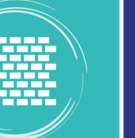
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To: Simon Davis <Simon.Davis@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Cc: Cllr. Sue Wallsgrove <Cllr.Sue.Wallsgrove@arun.gov.uk>; Cllr. Anita Lawrence <cllr.anita.lawrence@arun.gov.uk>; Cllr. Paul Ayling <cllr.paul.ayling@arun.gov.uk>; Sue Foott [REDACTED]
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Dear **Mr Davis** and **Mr Cann**,

Please find attached a letter which responds to comments in recent documentation posted on the Arun District Council website in relation to Application AL/20/26/PL concerning drainage issues.

Please register this letter on the public case file.

Many thanks

Yours sincerely

John S

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