



# THAKEHAM

## PARTNERSHIPS

Mr S Davis  
Principal Planning Officer  
Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex  
BN17 5LF

29 April 2022

Dear Simon,

**Re: Re-submission of details to discharge Condition 10, 11, 12 & 16 of planning permission AL/20/21/PL**

This covering letter accompanies the application and supporting documents submitted online through the Planning Portal under the reference: PP-11225709, which relates to the re-submission of details to support the discharge of Condition 10, 11, 12 & 16 of planning permission AL/20/21/PL at Land at Wings Nursery, Lidsey Road, Woodgate, PO20 3SU.

**Condition 10:**

*"Development shall not commence, other than works off 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 shall be occupied until the accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity."*

**Submitted Supporting Documents for Condition 10:**

1. Ground Appraisal Report (Ref: GE18390-GAR-OCT-19)
2. Geotechnical Testing Location Plan (Ref: D1990 SK01)
3. Woodgate GW Monitoring
4. D1757 Greenfield Run-off 2020-01-28
5. D1757 Greenfield Volume 2020-01-28
6. Impermeable Area Plan (Ref: D1990 SK02)
7. Exceedance Flow Plan (Ref: D1990 SK03)
8. Longitudinal Sections (Ref: D1990-12-1)
9. Longitudinal Sections (Ref: D1990-12-2)
10. Manhole Schedules (Ref: D1990-12-20 Rev B)
11. Longitudinal Sections (Ref: D1990-12-3)
12. Technical Layout (Ref: D1990-13-1 Rev G)
13. Surface Finishes (Ref: D1990-14-1 Rev D)
14. Drainage Details (Ref: D1990-15-1)
15. Drainage Details (Ref: D1990-15-2 Rev B)
16. Basin Details (Ref: D1990-15-3 Rev E)

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17. Basin Details (Ref: D1990-15-4 Rev A)
18. Construction Details (Ref: D1990-16-1 Rev A)
19. Combined Services (Ref: D1990-19-1 Rev A)
20. D1990 (Basin Liner) Design Sheet Version 3.1 (soft)
21. D1990 Cellular Design Sheet Version 1.1
22. Flow Control Data Sheets – Quotation – Bright Plan Civils – 60mm QR5
23. Flow Control Data Sheets – Quotation – Bright Plan Civils – 92mm QR5
24. Surface Water Calcs Network 1 Rev A
25. Surface Water Calcs Network 2 Rev A
26. C0030 – GE18390 Addendum Groundwater Letter Report May 20 FINAL

This application follows a previous application (Ref: AL/28/22/DOC) to discharge condition 10 of planning permission AL/20/21/PL which was refused by Arun District Council (ADC) on 25 April 2022. The Decision Notice for AL/28/22/DOC stated the following:

*'This condition cannot be discharged at the current time as there are outstanding concerns and matters to be addressed with the current submission. Please see the Drainage Engineers response on the website dated 19/04 (points 2,3,5,6,7,12,13,14 & 17). Please resubmit the application documents together with the requested information and amendments.'* For ease, a copy of this response has been appended to this letter.

In respect to of the Drainage Engineers Response to AL/28/22/DOC, our consultant engineers Bright Plan Civils (BCP) have sought to respond to relevant points as follows:

Point 2 - *The geotechnical report states 'soakaways may be viable, though the storage capacity will be severely restricted by the presence of the groundwater table'. The groundwater monitoring undertaken for the winter season concludes groundwater to be very shallow, consistently across the entire site and we would not expect testing the middle of the site to yield differing results, as such we consider groundwater will have a severe impact on infiltration techniques. There is no evidence within the geology that would suggest a potential 'pocket' of deeper groundwater, furthermore the attached full winter data shows groundwater peak at ground level in all locations. Whilst we concur that Infiltration must always be considered, no matter how minimal the opportunity. As designer, whilst we have considered requirements and comments raised, we also have to make our own professional judgment on whether infiltration is suitable in the long term because ultimately, we are responsible for the design. Our judgment remains that infiltration methods should not be considered due to the shallow groundwater and potential for groundwater to adversely affect the storage volume provided within infiltration structures. For this reason, permeable pavements must be lined.*

Point 3 - *Greenfield run-off rates - We are implementing a 3<sup>rd</sup> version of the drainage strategy where the initial rates were agreed in principle with the LPA following discussions of the initial strategy. It shall be noted, as cited within all previous FRA's, that part of the existing site is previously developed, comprising built form, with a typical 1:2yr flow rate of 25.82l/sec (would be higher for greater rainfall intensities). The proposed flow rate does not need to strictly adhere to the positively drained area for brownfield sites. Both SW systems however heavily restrict surface water flows leaving the site to a combined total of 6.5l/sec which equates to a 75% betterment given this will rate will be maintained for all rainfall intensities*

Point 5 - *Low points. These areas are deemed natural drainage. These areas 'may' accumulate some run-off during exceedance events and will drain down by evaporation and natural infiltration and as such would be classified as greenfield areas.*

Point 7 - *Network 2 – The 100yr plus 40% peak water level is 7.986m; the lowest permeable surface levels are in vicinity of plots 65-67 at 8.28m, therefore there is still ample 'freeboard' before flooding occurs. Its shall be noted that each share drive is designed as a subtle dish thus providing further control of exceedance volume at surface level before overtopping occurs to the adjacent watercourse.*

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Point 12 - The depth of groundwater in vicinity of the pond, noting the final peak winter groundwater monitoring is 0mm BGL for the flotation calculations. The proposed pond rim is approximately 250mm above natural ground level at this location, so the spreadsheet inputs currently reflect this. The calculation also includes for a 1.2 safety factor.

Point 13 – Points 2 and 3 resolve point 13

Point 14 - The overflow for flow control manhole S23 is clearly shown on drawing 15.3

Point 17 – Drawing provided.

**Condition 11:**

*“The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.”*

Submitted Supporting Documents for Condition 11:

1. Existing Watercourse Alterations General Arrangement and Levels (Ref: D1757-17-30 Rev C)
2. Existing Watercourse Alterations Construction Details (Ref: D1757-17-31 Rev C)
3. LDC.ARUN.2021.002 – Dated 14 May 2021
4. Ordinary Watercourse Land Drainage Consent - Dated 14 May 2021
5. Email correspondence with ADC Principal Drainage Engineer Paul Cann confirming extension of Ordinary Watercourse Land Drainage Consent.
6. D1990 ordinary watercourse application form

This application follows a previous application (Ref: AL/29/22/DOC) to discharge condition 11 of planning permission AL/20/21/PL which was refused by Arun District Council (ADC) on 25 April 2022. The Decision Notice for AL/29/22/DOC stated the following:

*‘It is noted that an extension has been granted for LDC/ARUN/2021/002. However, this land drainage consent does not include consent for the new drainage connections. Please apply for land drainage consent for the two new outfalls, i.e. for the proposed connection to the new culvert and for the proposed headwall further north on the open watercourse. Please supply evidence of consent. Please also confirm if it has been verified if there is any culvert outlet for the ditch on the western boundary?’*

In respect of the comments made on AL/29/22/DOC, we wish to respond as follows:

Whilst we acknowledge the condition attached to planning permission AL/20/21/PL, OWC is not actually a planning consideration and is covered under separate legislation (The Land Drainage Act (1991/2010)), the condition as worded does not require evidence of this consent. It is considered that the information provided to date meets the requirements of the condition as worded and therefore should be sufficient to discharge this pre-commencement condition.

For comfort, a copy of the existing consent alongside the agreed extension correspondence has been provided. To clarify the position, we can confirm that this consent does omit 2 structures which are not currently shown on the approved diversion plan, these structures will be included in an additional application.

Regarding the outlet for the watercourse on the western boundary, we have been unable to identify this at this stage. However, given the invert levels we would anticipate this connects to the north-western most extent of the ditch located to the north of the site, which is located on, and under riparian ownership of, a third-party landowner. Should it be located during construction and have impact on the proposed

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works we will consult with the local Land Drainage Engineer. Should any works outside of maintenance be required a further Land Drainage Consent Application will be made before any works are completed as per the Land Drainage Act (1991/2010).

As above, the requirement for such consent is secured through separate legislation, and it is therefore our view that it is not under the remit of Condition 11 to withhold discharge of the condition until this consent is received. The Land Drainage Act offers necessary protection, as it would not be in our, or our client's interest for unconsented works to be carried out which would in turn compromise the development.

In any event, development could commence in relation to all works outside of the omitted the structures, therefore whilst not our preferred strategy, we could discuss progression of part-discharge in the Council feels this may be the most appropriate solution in the interim.

#### **Condition 12:**

*"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."*

Submitted Supporting Document for Condition 12:

##### **1. Drainage Maintenance Statement (Ref: D1990/MS1.1)**

This application follows a previous application (Ref: AL/24/22/DOC) to discharge condition 11 of planning permission AL/20/21/PL which was refused by Arun District Council (ADC) on 25 April 2022. The Decision Notice for AL/24/22/DOC stated the following:

*'This condition can only be discharged once the surface water drainage system has been agreed for the site. The surface water system has not yet been approved and should not be constructed until approval has been received. Please note the comments in the Drainage Engineers response on the website dated 19/04 (points 1-4). Please resubmit the application documents together with the requested information and amendments.'* For ease, a copy of this response has been appended to this letter.

In respect to of the Drainage Engineers Response to AL/24/22/DOC, our consultant engineers Bright plan Civils (BCP) have sought to respond to relevant points as follows:

Point 1 - *Funding and maintenance will be provided by the Southern Housing Group Limited who are the housing association developing the site. This is now clarified in the report.*

Point 2 - *This is now clarified in the report, however as above I would reiterate this would already be covered under current legislation so no further information is considered necessary.*

Point 3&4 - *cellular storage now added for completeness.*

#### **Condition 16:**

*"Prior to the commencement of development, a detailed level survey of the site including existing and resulting ground levels and the slab levels of the building the subject of this approval, shall be submitted to and approved by the Local Planning Authority. The development shall proceed only in accordance*

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*with the details thus approved and there shall be no subsequent raising of levels without prior written approval of the Local Planning Authority."*

Submitted Supporting Documents for Condition 16:

1. Technical Layout (Ref: D1990-13-1 Rev G)
2. 27568R1 Woodgate Topographical Survey - August 2019

This application follows a previous application (Ref: AL/26/22/DOC) to discharge condition 16 of planning permission AL/20/21/PL which was refused by Arun District Council (ADC) on 25 April 2022. The Decision Notice for AL/26/22/DOC stated the following:

*'It is not possible to discharge this condition until the drainage scheme has been fully agreed as levels and drainage are inter related. There is an objection to the drainage scheme (under ref AL/28/22/DOC) and it will not be possible to discharge that condition at this time either. As such, the levels condition cannot be discharged at this time and you will need to make a revised submission.'*

This condition application has therefore been resubmitted as requested.

We trust that the documents provided are adequate to meet the Council's requirements to discharge the relevant condition. Should you require any further assistance, please do not hesitate to contact me.

Yours sincerely,



**Sarah Sutcliffe**  
**Planning Manager**

Thakeham House, Summers Place, Stone Street, Billingshurst, West Sussex, RH14 9GN

Company Registration No. 07218594. Registered Office Address



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**From:** Laura Gibbons <Laura.Gibbons@arun.gov.uk>  
**Sent:** 19 April 2022 14:25  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Subject:** RE: Planning Re-Consultation on: AL/28/22/DOC

Engineers Comments Regarding Condition 10

Included below are our original comments from 22<sup>nd</sup> March, and in italics are latest thoughts on these.

1. Please provide a layout plan showing the locations of groundwater monitoring and infiltration testing. *Now provided.*
2. Please provide further details of infiltration testing, i.e. date of testing and depth of pits. *Summer infiltration rates from testing at depth do not preclude the use of infiltration. Winter groundwater monitoring results show groundwater at shallow depths, however no monitoring was completed near the centre of the site. Therefore, we cannot support the use of zero infiltration with the information which is currently available. Please complete shallow infiltration testing to demonstrate whether infiltration is viable. This is required to evidence compliance with LLFA policy for the management of surface water policy 1.*
3. Please provide greenfield runoff rate calculations for the proposed impermeable area which is positively drained. *Run off rates have been calculated based upon a total site area of 2.53Ha, the positively drained area is 1.1Ha greenfield runoff rate calculations should be based upon this area. It is clear that runoff restrictions should be circa half that currently proposed.*
4. Please provide catchment impermeable areas diagrams. *Provided.*

5. Please provide exceedance flow drawings. *Please detail how water will drain from the low points in the open space area.*
6. Please detail hydrobrake unit references on layout and details. *Provided, but will be impacted by comments 2 and 3 above.*
7. Water level in network 2 is above cover levels of adjacent permeable paving- it appears that exceedance will occur in the 1 in 100 year plus 40% cc rainfall event. Please provide evidence of what flood depths will be, and that these will not threaten dwellings. *Adjusted design, however points 2 and 3 will alter this.*
8. Please provide manholes on the points of connection into the main network from pipes serving 2 or more dwellings. *Okay.*
9. Please clearly label finish and formation level of all permeable paving areas. *Detailed.*
10. Please label cover levels of gullies. *Okay.*
11. Please detail proposed outfall inverts, along with inverts of culvert and watercourse at the proposed points of connection. *Noted, to be reviewed as part of consent application.*
12. Please provide flotation calculations for cellular storage and attenuation basin. *Calculations provided, however no groundwater data near basin. Assumed depth of groundwater requires discussion and agreement.*
13. Please provide data sheets to evidence flow control devices for S102 and S23 will achieve the criteria within the flow model. *Provided, however please see points 2 and 3 which will alter this.*
14. Please detail overflow level on S23 construction detail drawing. *Level of overflow is still not detailed.*
15. Please detail membrane around attenuation tank on construction detail drawing. Please make detail site specific. *Okay.*
16. Please provide construction detail drawings of permeable paving. *Okay.*
17. Please provide two perpendicular cross sections of the basin, please detail liner, topsoil depths, etc. on construction detail drawing. *See comment 12.*
18. For the bagwork headwalls to the basin- please detail bag size, how full bags are to be with ST4 concrete, how bags are to be compacted, what bond pattern is to be followed, spacing of pins, minimum width of headwalls, etc. *Okay.*

Kind regards,

**Laura Gibbons**

Drainage Engineer

Engineering Services

Please note that I work Tuesdays 08:00-16:00 for Arun only.



T: 01903 221374

E: [laura.gibbons@arun.gov.uk](mailto:laura.gibbons@arun.gov.uk) [REDACTED]

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 13 April 2022 22:04

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Re-Consultation on: AL/28/22/DOC

To: **Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

### TOWN AND COUNTRY PLANNING ACT 1990

**Application No:** AL/28/22/DOC

**Registered:** 3rd March 2022

**Site Address:** Land At Wings Nursery Lidsey Road Woodgate PO20 3SU

**Grid Reference:** 493715 104134

**Category:** Discharge of Condi

**Description of Works:** Approval of details reserved by condition imposed under AL/20/21/PL relating to condition 10-surface water drainage. Decision due 28.04.22

I am able to inform you that I have received an amendment to the above application dated 12th April 2022 relating to: Amendments in response to drainage objections

[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 **28th April 2022**.

**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.**

Yours sincerely

Mr S Davis

Planning Case Officer-Arun District Council

Telephone: 01903 737874

Email: [Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)

FLRECON\_DOC (ODD) 2020



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**From:** Laura Gibbons <Laura.Gibbons@arun.gov.uk>  
**Sent:** 19 April 2022 14:40  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Subject:** RE: Planning Re-Consultation on: AL/24/22/DOC

Engineers Further Comments on Condition 12

Our original comments still stand, for ease of reference these are as follows:

It is not possible to recommend discharge of the maintenance manual until the surface water drainage design has been agreed. However, we have the following initial comments:

1. Please outline how maintenance will be funded.
2. Please include details of riparian responsibility for watercourses, this should include a maintenance schedule for the watercourses and a plan clearly showing the watercourses the development has an ongoing responsibility for.
3. Operation and maintenance requirements for all features must be fully detailed, i.e. tables detailing regular, occasional and remedial actions must be provided for each feature.
4. Maintenance requirements for cellular attenuation features must be provided.

Kind regards,

**Laura Gibbons**

Drainage Engineer

Engineering Services

Please note that I work Tuesdays 08:00-16:00 for Arun only.



**T:** 01903 221374

**E:** [laura.gibbons@arun.gov.uk](mailto:laura.gibbons@arun.gov.uk)

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 08 April 2022 13:34

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Re-Consultation on: AL/24/22/DOC

**To: Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

### TOWN AND COUNTRY PLANNING ACT 1990

**Application No:** AL/24/22/DOC

**Registered:** 3rd March 2022

**Site Address:** Land At Wings Nursery Lidsey Road Woodgate PO20 3SU

**Grid Reference:** 493715 104134

**Category:** Discharge of Condi

**Description of Works:** Approval of details reserved by condition imposed under AL/20/21/PL relating to condition 12-surface water drainage.

I am able to inform you that I have received an amendment to the above application dated 8th April 2022 relating to: Amended Drainage Maintenance Statement

[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 **24th April 2022**.

**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.**

Yours sincerely

Mr S Davis

Planning Case Officer-Arun District Council

Telephone: 01903 737874

Email: [Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)

PLP/ECOM\_DOC (008) 2020