

25 October 2017

Opus International Consultants (UK) Ltd

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United Kingdom

FAO: Mr S Wilson

Ref: E-E1644/APT

Dear Stuart

RE 90 ROSE GREEN ROAD, ALDWICH PO21 3EQ AW/138/17/PL

Further to your email enclosing the planning conditions pertaining to the above permission we would advise as follows.

Surface Water –Conditions 6,7 and 14:.

These relate to surface water drainage provision. Information was previously submitted on 28/4/2017 in respect of Condition 4 to AW/363/15/OUT and is repeated below:

A series of 8 trial pits were made in November 2016 at the site and the findings are reported on in Opus report E-E1644/NM/DRC/CDS Dated April 2017. A copy of this report was issued to S Davis at Arun DC on 28 April 2017 under separate cover. A copy has also been issued to you.

The soil profile comprises Made Ground over River Terrace Deposits which comprise silty CLAY over gravelly fine SAND. Groundwater was encountered at some 2.4mbgl rising to 2.2mbgl. A BRE365 soakage test was undertaken in TP4 located on the gravelly fine SAND. The test water level fell by only 90mm in a four hour period (Test results contained in Appendix E of the GI report). Paragraph 8.9 of the GI report confirms *"The soakage testing carried out within the trial pit confirmed a poor rate of infiltration and traditional soakaway installation for storage and infiltration of surface waters is not considered viable."*

Notwithstanding the poor permeability the GWL encountered is not sufficient low to facilitate a 1m depth of unsaturated gravelly fine SAND for pollutant attenuation purposes as advocated in GP3. Location of a soakaway onto this strata would be considered a direct injection to groundwater and is not supported by EA policy and positional statements. Furthermore we would expect possible rise in GWL from early November 2016 to seasonally higher levels in Jan-Feb 2017 further prejudicing soakaway potential.

It is therefore concluded that a SUDS hierarchy tier 1 (infiltration) approach is not feasible. There are no watercourses within the site and a tier 2 approach is also not feasible. The local area drainage is supported by separate public surface water and foul water sewers. A tier 3 approach for attenuated connection to the public surface water sewer is therefore proposed.

The proposed surface water drainage system comprises collection to a pair of geocellular storage tanks and discharge to the public surface water sewer via a flow control device (Hydrobrake). A rainfall design load of 1%AEP +30%CC has been used. To reduce the risk of blockage the outfall controls minimum

discharge rate of 5 l/s has been used in accordance with EA report SC030219 - Rainfall Runoff Management for Developments.

The proposed design is indicated on drawing EF1644-C300-P3 (enclosed). On site construction to meet Building Regulations. The offsite connection to the Southern Water public surface water sewer will need to be constructed to Sewers for Adoption standard. You will need to make a S106 connection application to Southern Water to register the new properties on to their system and formalise their connection.

This arrangement is consistent with the proposals set out at outline stage in section 4.2 of the Foul and surface water drainage statement.

A schedule of O&M requirements for the SUDS infrastructure is attached. You will need to append this to details of the financial management arrangements for funding the SUDS infrastructure operation and maintenance to form a complete submission with respect to condition 7 and 14.

Foul Water Condition 8

Drawing EF1644-C300-P3 also details the FW system. This will reuse the existing public FW connection within the site and out to Rose Green Road. A S106 connection application will need to be made to Southern Water to register the new properties on to their system and formalise their connection.

On site construction to meet Building Regulations.

This arrangement is consistent with the proposals set out at outline stage in section 4.2 of the Foul and surface water drainage statement.

Yours sincerely
for Opus International Consultants (UK) Ltd

Andy Traves
Associate Director

Enc drawing EF1644-C300-P3 and Micro-drainage calculations
 SUDS O&M schedule

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XP Solutions		Network 2015.2

Online Controls for Storm

Hydro-Brake Optimum® Manhole: S2, DS/PN: S1.001, Volume (m³): 3.1

Unit Reference MD-SHE-0109-5000-0800-5000
Design Head (m) 0.800
Design Flow (l/s) 5.0
Flush-Flo™ Calculated
Objective Minimise upstream storage
Diameter (mm) 109
Invert Level (m) 4.179
Minimum Outlet Pipe Diameter (mm) 150
Suggested Manhole Diameter (mm) 1200

Control Points	Head (m)	Flow (l/s)
Design Point (Calculated)	0.800	5.0
Flush-Flo™	0.242	5.0
Kick-Flo®	0.537	4.2
Mean Flow over Head Range	-	4.3

The hydrological calculations have been based on the Head/Discharge relationship for the Hydro-Brake Optimum® as specified. Should another type of control device other than a Hydro-Brake Optimum® be utilised then these storage routing calculations will be invalidated

Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)	Depth (m)	Flow (l/s)
0.100	3.7	1.200	6.0	3.000	9.3	7.000	13.9
0.200	5.0	1.400	6.5	3.500	10.0	7.500	14.4
0.300	5.0	1.600	6.9	4.000	10.6	8.000	14.8
0.400	4.8	1.800	7.3	4.500	11.3	8.500	15.2
0.500	4.5	2.000	7.7	5.000	11.8	9.000	15.7
0.600	4.4	2.200	8.0	5.500	12.4	9.500	16.1
0.800	5.0	2.400	8.4	6.000	12.9		
1.000	5.5	2.600	8.7	6.500	13.4		

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Storage Structures for Storm

Cellular Storage Manhole: S2, DS/PN: S1.001

Invert Level (m) 3.994 Safety Factor 2.0
Infiltration Coefficient Base (m/hr) 0.00000 Porosity 0.95
Infiltration Coefficient Side (m/hr) 0.00000

Depth (m)	Area (m ²)	Inf. Area (m ²)	Depth (m)	Area (m ²)	Inf. Area (m ²)
0.000	55.0	0.0	2.600	0.0	0.0
0.200	55.0	0.0	2.800	0.0	0.0
0.400	55.0	0.0	3.000	0.0	0.0
0.600	55.0	0.0	3.200	0.0	0.0
0.800	55.0	0.0	3.400	0.0	0.0
1.000	0.0	0.0	3.600	0.0	0.0
1.200	0.0	0.0	3.800	0.0	0.0
1.400	0.0	0.0	4.000	0.0	0.0
1.600	0.0	0.0	4.200	0.0	0.0
1.800	0.0	0.0	4.400	0.0	0.0
2.000	0.0	0.0	4.600	0.0	0.0
2.200	0.0	0.0	4.800	0.0	0.0
2.400	0.0	0.0	5.000	0.0	0.0

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Summary of Critical Results by Maximum Level (Rank 1) for Storm

Simulation Criteria

Areal Reduction Factor 1.000 Additional Flow - % of Total Flow 0.000
Hot Start (mins) 0 MADD Factor * 10m³/ha Storage 2.000
Hot Start Level (mm) 0 Inlet Coefficient 0.800
Manhole Headloss Coeff (Global) 0.500 Flow per Person per Day (l/per/day) 0.000
Foul Sewage per hectare (l/s) 0.000

Number of Input Hydrographs 0 Number of Storage Structures 1
Number of Online Controls 1 Number of Time/Area Diagrams 0
Number of Offline Controls 0 Number of Real Time Controls 0

Synthetic Rainfall Details

Rainfall Model FSR Ratio R 0.350
Region England and Wales Cv (Summer) 0.750
M5-60 (mm) 19.000 Cv (Winter) 0.840

Margin for Flood Risk Warning (mm) 300.0 DVD Status OFF
Analysis Timestep Fine Inertia Status OFF
DTS Status ON

Profile(s) Summer and Winter
Duration(s) (mins) 15, 30, 60, 120, 180, 240, 360
Return Period(s) (years) 1, 30, 100
Climate Change (%) 0, 0, 30

PN	US/MH Name	Storm	Return Period	Climate Change	First (X) Surge	First (Y) Flood	First (Z) Overflow	Overflow Act.
S1.000	S1	15 Winter	100	+30%	30/15 Summer	100/15 Summer		
S1.001	S2	120 Winter	100	+30%	30/60 Winter			

PN	US/MH Name	Water Level (m)	Surcharged Depth (m)	Flooded Volume (m³)	Flow / Cap.	Overflow (l/s)	Pipe Flow (l/s)	Status	Level Exceeded
S1.000	S1	6.103	1.503	2.703	2.56		35.9	FLOOD	4
S1.001	S2	4.676	0.347	0.000	0.38		5.0	SURCHARGED	

SUDS operation and maintenance - general

There are three categories on maintenance activities:

Regular maintenance consists of basic tasks done on a frequent and predictable schedule, including vegetation management, litter and debris removal, and inspections.

Occasional maintenance comprises tasks that are likely to be required periodically, but on a much less frequent and predictable basis than the routine tasks (sediment removal is an example). The table below summarises the likely maintenance activities required for each SUDS component and specific maintenance activities is given in the following sections.

Remedial maintenance comprises intermittent tasks that may be required to rectify faults associated with the system. Where remedial work is found to be necessary, it is likely to be due to site-specific characteristics or unforeseen events, and as such timings are difficult to predict. Remedial maintenance items can comprise items such as:

- inlet/outlet repairs
- erosion repairs
- reinstatement or realignment of edgings, barriers, rip-rap or other erosion control
- infiltration surface rehabilitation
- replacement of blocked filter fabrics
- construction stage sediment removal (although this activity should have been undertaken before the maintenance contract)
- system rehabilitation immediately following a pollution event.

O&M activity	SUDS component												
	Pond	Wetland	Detention basin	Infiltration basin	Soakaway	Infiltration trench	Filter trench	Modular storage	Pervious pavements	Swale/bioretention/greenroofs	Filter strip	Sand filter	Pre-treatment systems
Regular maintenance													
Inspection	■	■	■	■	■	■	■	■	■	■	■	■	■
Litter/debris removal	■	■	■	■	□	■	■	□	■	■	■	■	■
Grass cutting	■	■	■	■	□	■	■	□	□	■	■	□	□
Wee/invasive plant control	□	□	□	□		□	□		□	□	□	□	□
Shrub management	□	□	□	□					□	□	□		□
Shoreline vegetation management	■	■	□										□
Aquatic vegetation management	■	■	□										□
Occasional maintenance													
Sediment management *	■	■	■	■	■	■	■	■	■	■	■	■	■
Vegetation/plant replacement	□	□	□	□						□	□		□
Vacuum sweeping and brushing									■				
Remedial maintenance													
Structure rehabilitation/repair	□	□	□	□	□	□	□	□	□	□	□	□	□
Infiltration surface reconditioning				□	□	□	□		□	□	□	□	

■ will be required

□ may be required

* sediment to be collected upstream of the main device

GENERAL MAINTENANCE

Litter/debris removal

This is an integral part of SUDS maintenance and reduces the risks of inlet and outlet blockages, retains amenity value and minimises pollution risks. High litter removal frequencies may be required at high profile commercial/retail parks where aesthetics are a major driver.

Grass cutting

It is recommended that grass cutting be minimised around SUDS facilities, apart from swales and filter strips and structural embankments where a height of 100–150 mm is recommended to prevent the plants falling over, or “lodging”, when water flows across the surface. In general, allowing grass to grow tends to enhance water quality performance. Short grass around a wet system such as pond or wetland provides an ideal habitat for nuisance species such as geese; allowing the grass to grow is an effective means of discouraging them. Grass around wet pond or wetland systems should not be cut to the edge of the permanent water. Grass cutting is an activity undertaken primarily to enhance the perceived aesthetics of the facility. The frequency of cutting will tend to depend on surrounding land uses, and public requirements. Therefore, grass cutting should be done as infrequently as possible, recognising the aesthetic concerns of local residents. However, grass around inlet and outlet infrastructure should be trimmed closely to reduce risks to system performance. If a manicured, parkland effect is required, then cutting will need to be undertaken more regularly than for meadow type grass areas, which aim to maximise habitat and biodiversity potential.

Weed/invasive plant control

Weeds are generally defined as vegetation types that are unwanted in a particular area. For SUDS, weeds are often alien or invasive species, which do not enhance the technical performance or aesthetic value of the system, or non-native species and the spread of which is undesirable. In some places, weeding has to be done by hand to prevent the destruction of surrounding vegetation (hand weeding should generally be required only during the first year, ie during plant establishment). However, over grassed surfaces, mowing can be an effective management measure. The use of herbicides and pesticides should be prohibited since they cause water quality deterioration. The use of fertilisers should also be limited or prohibited to minimise nutrient loadings which are damaging to water bodies.

Shrub management

Shrubs tend to be densely planted and are likely to require weeding at the base, especially during the first year to ensure that they get enough water. Shrubs should be selected so they can grow to their maximum natural height without pruning.

Aquatic/shoreline vegetation management

Aquatic plant aftercare in the first 1–3 years may be required to ensure establishment of planted vegetation and control nuisance weeds/invasive plants. Once established, the build-up of dead vegetation from previous seasons should be removed at convenient intervals to reduce organic silt accumulation (eg every three years and at the end of landscape contract periods).

Emergent vegetation may need to be harvested every 5–10 years to maintain flood attenuation volumes, optimise water quality treatment potential and ensure fresh growth, although this is often not required. Care should be taken to avoid nesting birds during the breeding season and to avoid great crested newt and water vole habitats. The typical window for this activity is towards the end of the growing season (September and October). As vegetation matures, plant height may also become a safety issue in residential areas.

Where emergent vegetation is managed, up to 25 per cent can be removed by cutting at 100 mm above soil level using shearing action machinery. Up to 25 per cent of submerged vegetation can be cut and raked out at any one time, using approved rakes, grabs or other techniques, depending on whether clay or waterproof membranes are present. Aquatic vegetation arisings should be stacked close to the water's edge for 48 hours to de-water and allow wildlife to return to the SUDS feature. They should then be removed to wildlife piles, compost heaps or off site before decomposition, rotting or damage to existing vegetation can occur.

Algae removal may be undertaken for aesthetic purposes during the first 3–5 years of a pond/wetland's life. The growth of algae, which is considered by some to be visually intrusive, is encouraged by nutrients introduced into the water body. This situation should settle down once upstream construction activities are complete.

Management of green waste

Appropriate methods should be implemented to dispose of green waste, including

- The development of wildlife piles
- On- or off-site composting
- Disposal to landfill

REMEDIAL MAINTENANCE

Structure rehabilitation/repair

There will come a time with most SUDS techniques when a major overhaul of the system is required to remove clogged filters, geotextiles, gravel etc. This will typically be between 10 and 25 years, depending on the technique and factors such as the type of catchment and sediment load. For example the use of geotextiles close to the surface in pervious surfaces traps the majority of sediment in a relatively easily accessible location. Reconstruction of the surface layer and bedding layer is all that is required, rather than reconstruction of the whole pavement depth.

Major overhaul is most likely to be required on techniques that rely on filtration through soils or aggregates, such as sand filters and infiltration devices. Other SUDS techniques are unlikely to need major overhaul if routine maintenance is undertaken as required (for example ponds and wetlands).

Rehabilitation activities for each SUDS component are described on the following tables.

Infiltration surface rehabilitation

In the event that grassed surface permeability has reduced, there are a number of landscape techniques that can be used to open the surface to encourage infiltration. Such activities are not commonplace and are likely to be required only in circumstances where silt has not been effectively managed upstream.

1. Scarifying to remove “thatch”. Thatch is a tightly intermingled organic layer of dead and living shoots, stems and roots, developing between the zone of green vegetation and the soil surface. Scarifying with tractor-drawn or self-propelled equipment to a depth of at least 50 mm breaks up silt deposits, removes dead grass and other organic matter and relieves compaction of the soil surface.
2. Spiking or tining the soil, using aerating equipment to encourage water percolation. This is particularly effective if followed by top dressing with a medium to fine sand, and is best undertaken when the soil is moist. Spiking or tining with tractor drawn or self-propelled equipment penetrates and perforates soil layers to a depth of at least 100 mm (at 100 mm centres) and allows the entry of air, water, nutrients and top dressing materials.
3. As a last resort, it may be necessary to remove and replace the grass and topsoil by:
 - removing accumulated silt and (subject to a toxicity test) applying to land or dispose of to landfill
 - removing damaged turf which should be composted
 - cultivating remaining topsoil to required levels
 - re turfing (using turf of a quality and appearance to match existing) or reseeded (to BS 7370: Part 3, Clause 12.6 (BSI, 1991) using seed to match existing turf) area to required levels. It may be necessary to supply and fix fully biodegradable coir blanket to protect seeded soil. Turf and seeded areas should be top dressed with fine sieved topsoil to BS 3882 (BSI, 1994) to achieve final design levels. Watering will be required to promote successful germination and/or establishment.

Water butts operation and maintenance

Maintenance schedule	Required action	Frequency
Regular maintenance	Cleaning of tank, inlets, outlets, gutters, withdrawal devices and roof drain filters of silts and other debris..	Annually (or following poor performance).
Occasional maintenance	Replacement of any filters.	As required
Remedial actions	Repair of erosion damage, or damage to tank.	As required
Monitoring	Inspection of the tank for debris and sediment build up.	Annually (or following poor performance).
	Inspection of inlets, outlets and withdrawal devices.	Annually (or following poor performance).
	Inspection of areas receiving overflow, for evidence of erosion.	After extreme storms.
	Inspection of roof drain filters	Annually (or following poor performance).

Modular systems operation and maintenance

Maintenance schedule	Required action	Frequency
Regular maintenance	Inspect and identify any areas that are not operating correctly. If required, take remedial action.	Monthly for 3 months, then six monthly
	Debris removal from catchment surface (where may cause risks to performance)	Monthly
	Where rainfall infiltrates into blocks from above, check surface of filter for blockage by silt, algae or other matter. Remove and replace surface infiltration medium as necessary.	Monthly (and after large storms)
	Remove sediment from pre-treatment structures	Annually, or as required
Occasional maintenance	-	-
Remedial actions	Repair/rehabilitation of inlets, outlet , overflows and vents	As required
Monitoring	Inspect/check all inlets, outlets, vents and overflows to ensure that they are in good condition and operating as designed	Annually and after large storms