



From: Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Sent: 27 July 2021 11:38
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Michael Eastham <Michael.Eastham@arun.gov.uk>
Subject: RE: Planning Consultation on: A/110/21/PL

Engineers Comments Regarding Surface Water Drainage

The application is within an area at risk from both fluvial and pluvial flooding. Proposed attenuation must be located out of the anticipated flood extents. The application includes a flood risk assessment and surface water drainage strategy.

The surface water drainage strategy is proposed to use attenuation tanks and pump surface water at a discharge rate equivalent to 50% of the brownfield rate. Local policies are clear that where possible brownfield sites should discharge at greenfield QBar, or as close to this as possible, with a maximum discharge equivalent to 50% of brownfield rate. The applicant must demonstrate why they cannot discharge at greenfield QBar (based upon the positively drained area) and how close to this rate they can achieve.

Pumping is not supported, as per policy 3 of the adopted West Sussex Lead Local Flood Authority Policy for the management of surface water.

It is reported that groundwater was observed at 2 to 3m below ground level. This evidence alone certainly does not preclude the use of infiltration. We do not require 1m easement between the base of infiltrating structures and peak groundwater level.

It is not clear how the proposals will deliver adequate treatment of water prior to discharge, or how the proposed SuDS will provide any amenity or biodiversity value. Surface water drainage calculations must use latest FEH rainfall data, apply appropriate urban creep allowances and appropriate Cv values.

Based on the above we wish to raise a HOLDING OBJECTION to this application. It has not been evidenced that the proposed layout can be adequately drained in accordance with policy requirements. Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. Leaving drainage design until after a layout has been agreed will likely unduly prejudice drainage design and not allow for the hierarchy for sustainable drainage to be followed.

In order to overcome this objection the applicant should submit:

- Evidence to demonstrate the maximum storage available on site and the associated discharge rate. This is required to demonstrate that discharge will be restricted to as close to greenfield QBar as is achievable.

- A gravity surface water drainage system. Including revised compliant calculations and a revised surface water drainage layout.
- Details of pollution mitigation indices delivered through drainage proposals.

However, if you are minded to application prior to this information being supplied please ensure the following conditions are applied:

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:

INFORMD

“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 BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm 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 event plus 40% on stored volumes, as an allowance for climate change. 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

<https://www.arun.gov.uk/surfacewater> 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

“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.

ENGDI

"Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the local planning authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose. The scheme shall thereafter be maintained 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.

Kind regards,

Laura Gibbons

Drainage Engineer

Engineering Services

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



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

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

Sent: 13 June 2021 11:49

To: Land Drainage

Subject: Planning Consultation on: A/110/21/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: A/110/21/PL
Registered: 3rd June 2021
Site Address: BMW House Chandlers Garage Ltd Water Lane Angmering BN16 4EH
Grid Reference: 506925 104447
Description of Works: Erection of retirement apartment with 20 No. 1 Bed flats & 13 No.2 Bed flats with communal facilities & car parking, erection of a retail store with car parking & associated highway works. This application affect the character & appearance of the Angmering Conservation area, affects the setting of listed buildings and is in CIL Zone 2 (Zero Rated) as other development.

The Council have received the above application.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 15th July 2021 . You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning.

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can the the leaflet how to respond to planning applications <https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

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.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://www.planningportal.co.uk/info/200207/appeals> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Mrs A Gardner

Planning Officer- Arun District Council

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