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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Sent: 21 September 2021 08:16
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: A/168/21/PL

Engineers Comments Regarding Surface Water Drainage

A surface water drainage strategy has been submitted with this application. The strategy identifies an attenuation drainage strategy with discharge limited to 2.9l/s. We note that winter groundwater monitoring has been completed and ground water was found at just over 1m depth throughout the site. Winter infiltration testing was completed, but three repeat tests were not completed at any location. The single test completed at each location indicate that infiltration is viable here. Full winter infiltration testing in accordance with BREDG365 must be completed.

The drainage strategy must follow the hierarchy for sustainable drainage. If infiltration is viable we expect it to be used. Given the infiltration rates found so far it is likely that a shallow blanket infiltration system with high level overflow to ditch will be required. This may impact upon layout. Saying that infiltration will not fit within a layout is insufficient justification for not following the hierarchy.

Permeable paving, shallow conveyance and infiltration features are likely to be required on this site. We wish to see a considered infiltration drainage strategy design showing how this will fit in with the proposed layout.

We note that soft landscaping proposals include numerous trees within close proximity of both pipework and basins. Trees must be positioned so that their root potential areas do not conflict with drainage proposals. It should also be noted that attenuation features should not be counted within useable public open space provision.

Ground raising is discouraged. If it is considered absolutely necessary, then due consideration must be given to the potential impacts on existing properties adjacent the development site, in terms of possible elevated groundwater levels and surface water run-off implications.

On the assumption that a connection to the watercourse is required, offsite improvements to ditches and culverts are required to facilitate a formal discharge. This was discussed at a site meeting between ADC and the developer and is referenced within the FRA/Drainage Strategy. The details of these improvements will need to be agreed as a part of the process of discharging planning conditions.

The watercourse on the western boundary would appear to have been culverted in part without permission. Removal of the culvert and subsequent ditch reinstatement will need to be agreed, again when discharging planning conditions.

We wish to raise a holding objection at this time. Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. An infiltrating surface water drainage solution should be considered at this stage, with factors of safety applied to infiltration rates that are currently available. 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. Furthermore, inadequately considering drainage at this stage could potentially result in a lack of sufficient capacity being provided for surface water drainage and therefore the development could lead to an increased risk of flooding elsewhere.

To overcome our holding objection the following should be supplied:

- A revised surface water drainage strategy, including layout and calculations, demonstrating how an infiltration drainage solution can be provided within the proposed layout.
- Revised landscaping proposals removing conflict between trees and drainage.

However, if you are minded to approve the application please ensure the following conditions are applied:

PCENG D2

“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:

INFORM D

“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 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 | 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.”

PCENG3

“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. “

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. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing.

And the accompanying informative:

INFORMD2

“Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), or its agent (Arun District Council land.drainage@arun.gov.uk), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens.

The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse.”

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.

ENG1

“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: 18 August 2021 08:34

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: A/168/21/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/168/21/PL

Registered: 17th August 2021

Site Address: Land South Of Littlehampton Road and East of Worthing Road Angmering
BN12 6PN

Grid Reference: 508006 103111

Description of Works: Erection of 76 No. dwellings, means of access, public open space, play areas, associated infrastructure & landscaping. This application is a Departure from the Development plan, is in CIL Zone 5 and is CIL Liable as new dwellings & affects a Public Right of Way.

The Council have received the above application.

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

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 17th September 2021 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

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 information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

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://acp.planninginspectorate.gov.uk/> 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

Telephone: 01903 737529

Email: Anita.Gardner@arun.gov.uk

PLCONSULT (CDB) 2020