

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

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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 14 March 2022 12:01

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

Cc: Anita Gardner <Anita.Gardner@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

Subject: RE: Planning Consultation on: A/266/21/PL

Engineers Comments Regarding Surface Water Drainage

No flood risk assessment (FRA) or drainage design has been provided to support this application. Much of the site is at risk of surface water flooding, with an area in the location of the proposed house for Plot 2 at risk of surface water flooding in a 1 in 100 year storm event (with no allowance for climate change). Paragraph 167 of the National Planning Policy Framework states that local planning authorities should ensure that flood risk is not increased as a result of a proposed development. Footnote 55 states that in "flood zone 1 an assessment should accompany all proposals involving (...) land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use." The introduction of two new dwellings in an area which was formerly a garden will introduce a more vulnerable use and will be in an area subject to other sources of flooding (surface water).

Therefore I wish to lodge a holding objection to this application. To overcome my objection the applicant should provide an FRA that takes account of the surface water flood risk on the site and shows that flood risk will not be increased on or offsite as a result of the proposed development. If the site layout is to remain unchanged then compensatory storage for the lost surface water flood area may need to be provided.

If the FRA is provided and is satisfactory then the applicant should be aware that the proposed new dwellings have adequate space for containing a soakaways in their rear gardens. However, the proposed development will likely disrupt the existing surface water drainage for Crete House. Therefore we would expect to see a surface water design for the whole site, including the extended Crete House. The surface water drainage for Crete House will likely need to be located to the north of the house under the driveway as existing and proposed trees (root protection zones) must not conflict with suds features/pipework.

If you are minded to approve the application despite my holding objection please apply the following conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

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 infiltration tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method. All design storms must include a climate change allowance of 40% on stored volumes or rainfall intensity. Infiltration structures must cater for the critical 1 in 10 year storm event, (plus 40%) between the invert of the entry pipe to the soakaway and the base of the structure. The design must also have provision to ensure there is capacity in the system to contain the critical 1 in 100 year storm event (plus 40%).

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 groundwater table in support of the design. The applicant is advised to discuss the extend of ground water monitoring with the council's engineers.

Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application.”

Sarah Burrow
Engineering Assistant, Engineering Services

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Current working pattern: Monday-Friday: 8am - 2:30pm

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 01 February 2022 09:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: A/266/21/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/266/21/PL
Registered: 31st January 2022
Site Address: Crete House The Beeches Dappers Lane Angmering BN16 4EN
Grid Reference: 507291 104939
Description of Works: 2 No. 2 storey extensions, replace existing bay window with bi-fold doors on the existing dwelling and the construction of 2 No. 5 bed new dwellings. This application is in CIL Zone 2 and is CIL liable as new dwellings.

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 3rd March 2022. 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://app.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 (008) 2020