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**From:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>  
**Sent:** 01 November 2019 14:44  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: BE/109/19/OUT

### **Engineers Comments Regarding Surface Water Drainage Design**

The surface water drainage strategy is proposing to use permeable paving (infiltrating or lined depending on groundwater and infiltration test results) and an underground attenuation tank with restricted discharge to two boundary watercourses. The strategy discounts the use of any open features (balancing ponds, swales and detention basins) on the basis of 'Limited space available space [sic] within the proposed development site.' Surface water drainage must be considered at the earliest opportunity and form part of the layout development process, therefore having limited space is not a reasonable excuse. 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.

Therefore it is asked that the applicant reconsider the layout of the proposed development in order to incorporate open surface water drainage features to minimise storage in underground attenuation tanks. It is believed that this is possible without changing the location of buildings. It may also be possible to extend the permeable paving to provide a blanket infiltration solution.

Furthermore the applicant proposes discharging some of the surface water from the site to the watercourse on the western boundary. There are known capacity issues at this watercourse and it may be necessary for the applicant to carry out remedial works to the watercourse and downstream culvert in order to gain permission to discharge to it.

The applicant will need to ensure that no structures including boundary fences are located within 3 metres of the near bank of any watercourse.

Regardless of the issues above, if you are minded to approve the application 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:

#### **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 here <https://www.arun.gov.uk/drainagechecklist> on Arun District Councils website, this should be submitted with a Discharge of Conditions Application."*

#### **PCENG D3**

*"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. No construction is permitted, which will restrict current and future land owners 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](mailto: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."*

#### **PCENG D4**

*"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.

#### ENGD1

*"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

Sarah Burrow

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**From:** [planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk) <[planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk)>

**Sent:** 31 October 2019 09:34

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

**Subject:** Planning Consultation on: BE/109/19/OUT

To: **Engineers (Drainage)**

#### NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town & country Planning (Development Management Procedure) (England) Order 2015 - Article 5

Outline Consent

**APPLICATION NO:** BE/109/19/OUT

**Registered:** 31st October  
2019

**Site Address:** Land east of Shripney Road & south of Haddan House Shripney  
Road Bersted PO22 9NW

**Grid Reference:** 493847 102031

**Description of Works:** Outline application with some matters reserved for up to 46 No dwellings together with access. This application is a Departure from the Development Plan.

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The Council have received the above application. I shall be pleased to receive any observations you may wish to make.

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

**Should you have any comments to make, these should be sent by replying to this email by 05-DEC-19.**

You can also monitor the progress of this application through the Council web site:

[www.arun.gov.uk/planning](http://www.arun.gov.uk/planning)

**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.**

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

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 as can the leaflet which deals with material planning considerations.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: [www.planningportal.gov.uk/planning/appeals/](http://www.planningportal.gov.uk/planning/appeals/) but they will protect personal details.

The officer dealing with this application is Mr S Davis who can be contacted on telephone number 01903 737874.

Regards  
Planning Officer

consultee\_email

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