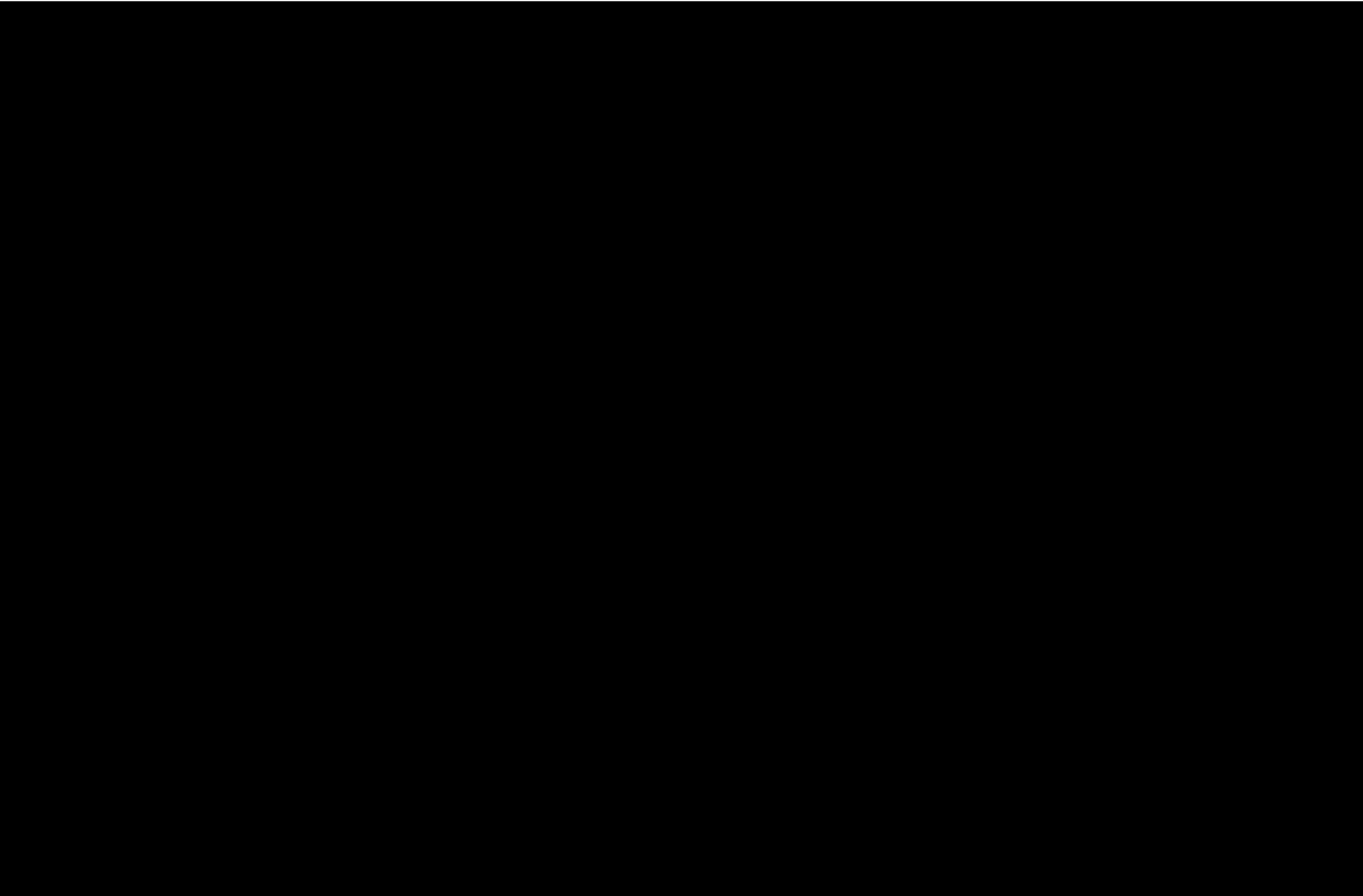




From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 14 February 2020 15:30
To: David Spring <David.Spring@arun.gov.uk>
Cc: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Hi David,

My responses in blue below. Please note I have no objection to the application, these points are simply for clarification going forward, assuming all parties are happy for surface water drainage to be dealt with as part of a DOC application should you approve this application.

1. Both the strategy and the flood risk assessment state that infiltration is not viable without having completed infiltration testing. It is standard policy for an application of this size to carry out infiltration testing (in accordance with BRE365) to prove that this is not viable.

Statement already agreed with Laura Gibbons that infiltration is not viable due to the flood compensation works and flood risk in the area. Reference should be made to previous accepted comment. Please provide evidence of this comment. Unfortunately Laura is no longer employed by Arun District Council, however, if she agreed as such we will not contradict her, please ensure that evidence of that agreement is uploaded when you come to finalise surface water drainage design to avoid being questioned on it again. If no evidence is supplied then it will be expected that winter infiltration testing is completed as per standard policy.

2. Groundwater monitoring is referenced within the Drainage Strategy "Previous groundwater levels are known to have been between 1.2mAOD in the north of the site and up to 3mAOD to the south". However it appears no groundwater monitoring data has been supplied. For a site of this size it is expected that a full winter's groundwater monitoring is completed even if infiltration is not viable to ensure that the risks of flotation are appropriately mitigated in design. The ground investigation by Hydrock references striking groundwater at 3mbgl however states that "no groundwater (..) monitoring data is provided". If the

applicant has groundwater monitoring data which shows groundwater to be at or close enough to ground level to rule out infiltration then this should be supplied and point 1 may be disregarded.

As per point 1. The response to point 1 does not apply here. As stated above "For a site of this size it is expected that a full winter's groundwater monitoring is completed ~~even if infiltration is not viable~~ to ensure that the risks of flotation are appropriately mitigated in design." Therefore when the design is agreed, a full winter's groundwater monitoring (that shows the peak groundwater level) will be required, if this has already been completed then the results simply need to be uploaded with the design.

3. The Flood Risk Assessment (but not the Drainage Strategy) proposes permeable paving of the parking areas which we would be keen to keep to add additional storage and further improve water quality.

Please refer to the drainage strategy in this regard. Permeable paving of the parking areas is not part of Lidl's specification, hence the design of the attenuation pond. Water treatment is a fundamental component of sustainable drainage design, as such the design will have to illustrate that water is treated adequately in accordance with the SuDS Manual as part of a DOC application.

4. We require a 3m easement from the top of the bank of the attenuation basin (on all sides).

Noted, we are double checking this and will confirm the 3m easement shortly. Great.

5. If the applicant intends to discharge to the watercourse (if infiltration has been proven unviable as per points 1 and 2) then they will need to apply for Land Drainage Consent to this department who acts on behalf of the LLFA.

This has been applied for previously through Laura Gibbons and therefore ADC has a record of this. Please contact Paul Cann the Principle Drainage Engineer regarding this as he is not aware of a Land Drainage Consent Application for this site and Laura would not have handled such an application.

6. QBar listed in the Flood Risk Assessment is inappropriate for this site and contradicts the Drainage Strategy.

Agreed, QBar is correct as per Drainage Strategy. Good.

7. As per the Drainage Strategy it is expected that the surface water drainage design caters for the 1 in 100 $\pm$ **40%** for climate change (not 30% as quoted in Flood Risk Assessment).

Correct, as per Drainage Strategy. Good.

8. Drawing details for all components of the design are expected to be submitted.

Noted, please confirm which drawings have not been received. We are aware that a detail of the basin has been provided, plus specifications for other components. We would expect to see construction details for pipe bed and surrounds, gullies, any manholes, catch pits/silt traps/petrol interceptors, control structures and headwalls.

Kind Regards

Sarah Burrow
Engineering Assistant

From: David Spring <David.Spring@arun.gov.uk>

Sent: 13 February 2020 13:30

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

Cc: Laura Gibbons <Laura.Gibbons@arun.gov.uk>

Subject: FW: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Importance: High

Hi Sarah,

Sorry to seem pushy with this one but I wondered if you could confirm if you are happy from a drainage perspective with the agent response below?

With many thanks,

David Spring B.Sc, M.Sc, M.A

Senior Planner (Agency)

Arun District Council, Maltravers Road, Littlehampton, BN17 5LF

Email: David.Spring@arun.gov.uk | DD: 01903 737521



From: David Spring

Sent: 12 February 2020 13:14

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

Cc: Laura Gibbons <Laura.Gibbons@arun.gov.uk>

Subject: FW: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Importance: High

Hi Sarah,

Please see follow up e mail below.

With regards,

David Spring B.Sc, M.Sc, M.A

Senior Planner (Agency)

Arun District Council, Maltravers Road, Littlehampton, BN17 5LF

Email: David.Spring@arun.gov.uk | DD: 01903 737521



From: Daniel Wheelwright [REDACTED]

Sent: 12 February 2020 10:48

To: David Spring <David.Spring@arun.gov.uk>

Subject: FW: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Importance: High

David,

Further to my last email, we also confirm that on point 4 that the proposal fully meets the easement requirements.

Kind regards

Daniel

Daniel Wheelwright
BA (Hons) MA MRTPI
Associate
Town Planning

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Environmental Impact Assessment | Policy | Site Search
Sector/Specialist Assessments | Section 106 Agreements/CIL



From: Daniel Wheelwright

Sent: 12 February 2020 10:05

To: David Spring <David.Spring@arun.gov.uk>

Subject: FW: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Importance: High

Morning David,

Please ignore my previous email which was sent prematurely. See our drainage engineers response to the points outlined below (in red). The key point is that the drainage strategy has been designed in full accordance with current prescribed standards and ADC's specification.

Daniel Wheelwright
BA (Hons) MA MRTPI
Associate
Town Planning

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Environmental Impact Assessment | Policy | Site Search
Sector/Specialist Assessments | Section 106 Agreements/CIL



From: Chris Leigh

Sent: 10 February 2020 15:34

To: Daniel Wheelwright

Cc: 'Joe Godfrey' [REDACTED]
Subject: RE: Drainage Engineer response - Planning Consultation on: BE/126/19/PL

Hi Dan,

I think I missed your call, responses as below.

Kind regards

Chris Leigh

Principal Engineer, Infrastructure & Highways

[REDACTED]
Kamboll UF Limited Registered in England & Wales Company No: 03659970
Registered office: 240 Blackfriars Road, London SE1 8NW

From: David Spring <David.Spring@arun.gov.uk>
Sent: 29 January 2020 21:02
To: Daniel Wheelwright <[REDACTED]>
Subject: FW: Planning Consultation on: BE/126/19/PL

Daniel,

FYI

With regards,

David Spring B.Sc, M.Sc, M.A

Senior Planner (Agency)

Arun District Council, Maltravers Road, Littlehampton, BN17 5LF

Email: David.Spring@arun.gov.uk | DD: 01903 737521



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 29 January 2020 17:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; David Spring <David.Spring@arun.gov.uk>
Subject: RE: Planning Consultation on: BE/126/19/PL

Engineers Comments Regarding Surface Water Drainage

It is believed that the applicant will be able to adequately drain surface water from the site, as such there is **no objection** from this department. Both a Drainage Strategy and Flood Risk Assessment have been supplied as part of this application however they contain conflicting information/details. The calculations have not been assessed in detail at this stage due to the differences between these documents. If you are minded to approve the application please apply the conditions listed below to ensure that the development is adequately drained and does not increase flood risk elsewhere. In addition, the following points require consideration:

1. Both the strategy and the flood risk assessment state that infiltration is not viable without having completed infiltration testing. It is standard policy for an application of this size to carry out infiltration testing (in accordance with BRE365) to prove that this is not viable.

Statement already agreed with Laura Gibbons that infiltration is not viable due to the flood compensation works and flood risk in the area. Reference should be made to previous accepted comment.

2. Groundwater monitoring is referenced within the Drainage Strategy "Previous groundwater levels are known to have been between 1.2mAOD in the north of the site and up to 3mAOD to the south". However it appears no groundwater monitoring data has been supplied. For a site of this size it is expected that a full winter's groundwater monitoring is completed even if infiltration is not viable to ensure that the risks of flotation are appropriately mitigated in design. The ground investigation by Hydrock references striking groundwater at 3mbgl however states that "no groundwater (..) monitoring data is provided". If the applicant has groundwater monitoring data which shows groundwater to be at or close enough to ground level to rule out infiltration then this should be supplied and point 1 may be disregarded.

As per point 1.

3. The Flood Risk Assessment (but not the Drainage Strategy) proposes permeable paving of the parking areas which we would be keen to keep to add additional storage and further improve water quality.

Please refer to the drainage strategy in this regard. Permeable paving of the parking areas is not part of Lidl's specification, hence the design of the attenuation pond.

4. We require a 3m easement from the top of the bank of the attenuation basin (on all sides).

Noted, we are double checking this and will confirm the 3m easement shortly.

5. If the applicant intends to discharge to the watercourse (if infiltration has been proven unviable as per points 1 and 2) then they will need to apply for Land Drainage Consent to this department who acts on behalf of the LLFA.

This has been applied for previously through Laura Gibbons and therefore ADC has a record of this.

6. QBar listed in the Flood Risk Assessment is inappropriate for this site and contradicts the Drainage Strategy.

Agreed, QBar is correct as per Drainage Strategy.

7. As per the Drainage Strategy it is expected that the surface water drainage design caters for the 1 in 100 ± **40%** for climate change (not 30% as quoted in Flood Risk Assessment).

Correct, as per Drainage Strategy.

8. Drawing details for all components of the design are expected to be submitted.

Noted, please confirm which drawings have not been received.

The applicant is strongly encouraged to read, complete **and submit** our Surface Water Drainage Checklist, available at: <https://www.arun.gov.uk/download.cfm?doc=docm93ijm4n14646.pdf&ver=14996>. In addition, further guidance is available at <https://www.arun.gov.uk/surfacewater/> and they are welcome to contact this department should they have further questions about the points raised.

Please apply the following standard conditions and informative:

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), 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.

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.

Thank you and kind regards

Sarah Burrow
Engineering Assistant

From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 17 December 2019 10:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BE/126/19/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: BE/126/19/PL

Registered: 13th December
2019

Site Address: Land at Phase 1A Oldlands Farm Shripney Road Bognor Regis
PO22 9NN

Grid Reference: 494208 101651

Description of Works: Erection of a discount convenience retail food store (Use Class A1)
& parking, landscaping & other associated works

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 18-JAN-20.

You can also monitor the progress of this application through the Council web site:
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/ but they will protect personal details.

The officer dealing with this application is David Spring who can be contacted on telephone number 01903 737521.

Regards
Planning Officer

consultee_email

<http://www.arun.gov.uk>

DX 57406 Littlehampton

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