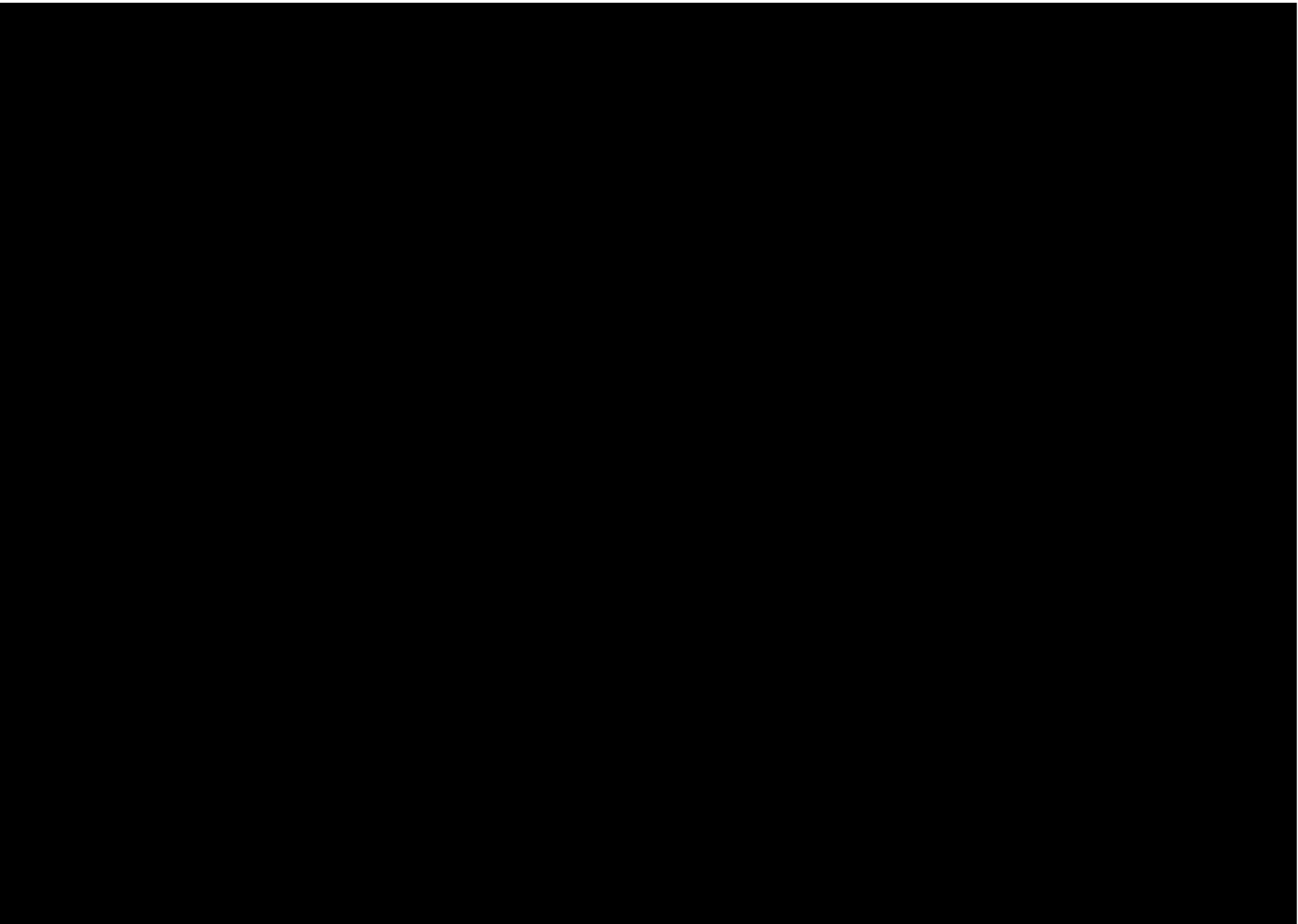




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**From:** Laura Gibbons <Laura.Gibbons@arun.gov.uk>  
**Sent:** 21 December 2021 13:22  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: BE/176/21/PL

Engineers Comments Regarding Surface Water Drainage

No supporting statement has been provided regarding the surface water drainage proposals. The drainage layout provided shows an attenuated drainage design, with discharge limited to 5l/s. If infiltration is not possible, runoff should be restricted to greenfield QBar based upon positively drained area, or 2l/s whichever is the greater. We note that the calculations supplied show a discharge of 2.1l/s. The layout also shows a tank which is 0.3m deep, yet calculations have 0.4m deep crates. Please can the applicant correct the layout to tally with calculations.

We also note that at detailed design we will require FEH2013 rainfall to be applied to calculations. We will also require results from winter groundwater monitoring and winter infiltration testing. It must be noted that winter groundwater monitoring results are required even for attenuation schemes to demonstrate that

The proposed attenuation proposals are within very close proximity to retained trees, and we note proposed trees are located immediately adjacent to/ over the attenuation tank. Root potential areas must not conflict with drainage features.

The applicant proposes to discharge surface water to the ordinary watercourse along Shripney Road. We understand this watercourse to run north, the proposed direction of connection would be against the flow, this is not

acceptable. We understand that there are at least two outlets from the watercourse, details of these, including invert level and downstream network condition will be required to evidence that the receiving watercourse can take the proposed flows. At this time we request that invert levels of outlets from the watercourse are provided to evidence that the proposed discharge is achievable and the development is implementable.

We wish to raise a **holding objection** to this application.

Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. 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.

In order to overcome our holding objection please can the applicant:

1. Supply a revised layout which corresponds with calculations.
2. A plan showing root potential areas and proposed surface water drainage must be provided, showing there is no conflict.
3. Supply invert levels of outlets from the ordinary watercourse.

Once this information is supplied we will require the following conditions:

#### **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:

### **INFORM2**

*“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.”*

### **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.

And the accompanying informative:

#### **INFORMD4**

*A surface water drainage verification condition guidance note is available at <https://www.arun.gov.uk/drainage-planning-consultations>, this clearly sets out our requirements for discharging this condition.*

Kind regards,

**Laura Gibbons**

Drainage Engineer

Engineering Services

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



**T:** 01903 221374

**E:** [laura.gibbons@arun.gov.uk](mailto:laura.gibbons@arun.gov.uk) or [REDACTED]

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

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 13 December 2021 11:04

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

**Subject:** Planning Consultation on: BE/176/21/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:** BE/176/21/PL  
**Registered:** 6th December 2021  
**Site Address:** The Cottage Shripney Road Bognor Regis PO22 9PA  
**Grid Reference:** 493805 102331  
**Description of Works:** Demolition of existing dwelling and ancillary outbuildings and erection of a 66 bedroom care home with associated access, parking and landscaping.  
This site is in CIL Zone 3 (Zero Rated) as other development & is a Departure from the Development Plan.

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 16th January 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

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: [Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)

PLCONSULT (CDB) 2020