

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

Sent: 17 August 2021 11:04

To: James Cross <James.Cross@arun.gov.uk>

Cc: Roger Spencer <Roger.Spencer@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: RE: BN/135/20/PL - Boweries, Barnham Road, Barnham

Hi James,

It has come to my attention that I missed a reference to surface water pumping on the proposed Drainage Strategy. Pumping surface water is not sustainable and is in contradiction of the adopted WSCC Policy for the Management of Surface Water. Therefore it is suggested that the applicant supplies a revised indicative strategy which shows that it is possible to drain surface water from the site without the use of a pump.

In order to do this it may be necessary to supply topographical levels of the watercourse on the south boundary (as the topographical levels rise at the south of the site, assumably before dropping again – not shown). Until we have evidence to show that no surface water pumps will be used on the site I will need to alter my consultation response to a **holding objection**. All my previous comments (below) still stand.

I wish to offer my sincere apologies for not noticing this detail earlier and for any inconvenience or delay that is caused to yourself and the applicant as result.

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



Current working pattern: Monday 8am-2:30pm, Tuesday 8am-5:30pm, Wednesday 8am-5pm, Thursday 8am-5:30pm, Friday 8am-11:30am.

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From: Sarah Burrow

Sent: 17 February 2021 11:10

To: James Cross <James.Cross@arun.gov.uk>

Cc: Roger Spencer <Roger.Spencer@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

Subject: RE: BN/135/20/PL - Boweries, Barnham Road, Barnham

Hi James,

Further to our conversation this morning I can confirm the following points:

1. The groundwater monitoring and infiltration testing show that infiltration at shallow depths will be viable at the north of the site and that surface water will have to be attenuated and discharged to the watercourse at the south of the site.
2. The use of crates for infiltration purposes is standard practice as it allows a larger volume to be stored prior to infiltration (compared to granular fill).
3. We would have no objection to soakaways (referred to as 'infiltration basins in error) in rear gardens, this is common practice, however our preference would be that each property should have an individual soakaway rather than a large shared one between property boundaries. This creates issues regarding management and access. Soakaways in rear gardens should be located 5m from buildings and 2.5 from property boundaries.
4. The use of plastic crates as attenuation is what we would seek to avoid, preferring the use of open features which also have ecological benefits. However, these open features cannot be counted towards the public open space for the site.
5. The surface water drainage strategy in the FRA was done without calculations or the monitoring and testing that you have sent today. It is simply to outline a possible solution and we would expect the strategy to change following the investigations. As such, please ensure that the FRA is not listed as an approved plan if permission is granted.
6. Whilst there may be challenges with devising a surface water drainage strategy for the site, due to the proportions of some of the plots, and the fact that it will be a 'hybrid' scheme which utilises both infiltration and restricted discharge to a watercourse, I do believe that the applicant will be able to find a solution that will enable them to discharge the drainage conditions which I formally requested. However, it is worth highlighting that this strategy will have to marry with the requirements for public open space and any arboricultural concerns, this is the most common reason for the use of attenuation crates/tanks, which as stated in point 4, we will be opposed to. We would encourage the project drainage engineer to work alongside the arboricultural consultant and planning to ensure that all requirements can be met, particularly within the restricted space at the south of the site.
7. The use of permeable paving will be encouraged for both infiltration and treatment of surface water falling on driveways and access roads.

In the e-mail below Kerry Simmons suggested that the project drainage engineer has been in direct contact with myself and that I confirmed that the drainage proposals are acceptable. I have no record of this. However, I am happy for the surface water drainage strategy to be dealt with via condition as per my initial consultation should you be minded to approve the scheme.

Kind Regards

Sarah Burrow

Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk

Whilst national restrictions are in place I will be working flexibly between the hours of 8am and 8pm. I appreciate your patience if I am slower than usual to respond. Equally I understand that you may be facing similar challenges and varying work patterns and will not be expecting immediate responses to my e-mails.

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From: James Cross <james.cross@arun.gov.uk>

Sent: 16 February 2021 17:51

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

Subject: FW: BN/135/20/PL - Boweries, Barnham Road, Barnham

Importance: High

Hi Sarah,

Can we catch up on this tomorrow at some point? I just think we might have a different approach. Seems like we'll need that chat after all 🤔

Kindest regards,

James Cross Msc, Bsc (Hons), LCGI TP.
Strategic Sites Project Officer, Planning

T: 01903 737500 ext 37784

E: james.cross@arun.gov.uk

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From: Kerry Simmons [REDACTED]
Sent: 16 February 2021 17:33
To: James Cross <James.Cross@arun.gov.uk>
Subject: RE: BN/135/20/PL - Boweries, Barnham Road, Barnham
Importance: High

Hi James,

Thank you for your email.

As you may recall the applicant has undertaken the infiltration testing (please see attached email) but this was not submitted due to the Council's Drainage Engineer advising in the consultation response that all outstanding drainage information could be required by condition. The project drainage engineer has also been in direct contact with Sarah Burrows (ADC Drainage Engineer) and confirmed that the drainage proposals are acceptable. For the purpose of clarification and completeness please see attached the BRE365 infiltration tests which confirms that the drainage layout submitted as part of this application can be adopted. This is also supported by the winter ground water monitoring (attached) undertaken last year.

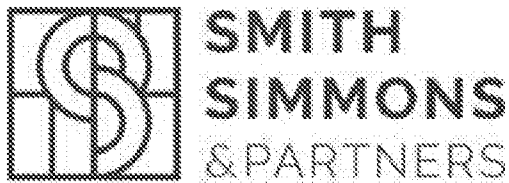
I trust this addresses the concerns raised and that the application can continue to progress to a positive outcome. We have received your email and draft Heads of Terms which we are reviewing to provide you with our comments, and are also progressing the outstanding highway information direct with Stephen Gee at WSCC.

I would be grateful if you could confirm that you are happy to proceed with the application.

Kind regards,
Kerry

Kerry Simmons
Partner

[REDACTED]
15 West Pallant, Chichester, PO19 1TB
www.ss-p.co.uk



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From: James Cross <James.Cross@arun.gov.uk>
Sent: 16 February 2021 15:38
To: Kerry Simmons [REDACTED]
Subject: RE: BN/135/20/PL - Boweries, Barnham Road, Barnham

Hi Kerry,

Thank you for bearing with me on full feedback regarding the above application. I have liaised with my internal colleagues in respect of surface water drainage and the proposed strategy put forward in your client's submission. I have also spoken with our Director of Place on this matter as this site forms part of the BEW Strategic Development Site.

I note from the Drainage Strategy that groundwater monitoring has not been undertaken. Equally, I understand that winter infiltration testing has not been undertaken. The sites adjacent to yours have had the benefit of having these survey works having been undertaken which confirm that the geology of the area, and infiltration testing, shows a high water table, rendering infiltration ineffective. Whilst I appreciate that such testing can vary from site to site, I have not received any further evidence to suggest any alternative conditions. I note that your Drainage Strategy seeks to rely upon infiltration. From our understanding and evidence of the nearby area, infiltration would be ineffective in this area. Our Drainage Engineer has concurred with this and will be providing updated comments in light of this.

You will note that Policy H SP2 of the Local Plan requires all development proposals to have accordance with the endorsed Framework Masterplan. Such matters detailed in the endorsed FM include drainage. This FM details how the area has a high water table due to groundwater monitoring, acknowledges the geological composition of the area and notes that infiltration is unlikely to be effective. The drainage of the site therefore relies upon a series of attenuation basins in accordance with the SUDS hierarchy. This is detailed in the endorsed FM and also adjacent parcels. We have no evidence to suggest that the circumstances would be any different in this instance. The design of any scheme should reflect the SuDs hierarchy which clearly starts at infiltration and then drops down to attenuation basins, with crating as a last result.

With the proposed quantum of development, we note that there is not enough physical space on the site to accommodate drainage basins. Achieving attenuation basins would implicate upon usable levels of Public Open Space; which is in direct contravention with the Arun District Council SPD. Therefore, the last method would be through using underground crates; which the submitted Drainage Strategy assumes would be required. To achieve the required rates this would rely upon crates being provided underneath the public open space, underneath most gardens and underneath the public open space to the south.

Whilst crating is seen as a last resort, and can be viewed on balance, the Council is not in a position to support the use of crating under the rear gardens of properties. This creates a number of management issues which would not necessarily be present, if a constraints led-scheme had been designed which is guided by the groundwater and infiltration testing. In the absence of any alternative evidence the Council would not wish to support crating as a first port of call; and would seek attenuation basins in accordance with the SuDs hierarchy and FM.

This matter of having a significant gap in evidence which would implicate upon the layout of the scheme was a matter considered by the Inspector in the earlier Appeal, which led to the dismissal of the Appeal. We note from

the Statement of Common Ground submitted that yourselves acknowledge that the drainage methodology is unknown and this may implicate upon the resultant development.

On the basis of the above, Arun District Council are unable to support the development in its submitted form. I am always happy to resolve issues and would be happy to consider any groundwater and infiltration testing undertaken. However, in the absence of such this matter is unfortunately unavoidable.

The application is set to lapse on 05 March 2021 and the Council will be issuing a refusal of planning permission before this time; unless contrary evidence can be provided to demonstrate the alternative. Equally, if you wish to withdraw the application then please let me know by no later than Friday 19 February 2021.

If you wish to discuss any of the above with me in further detail please do not hesitate to contact me on the below details at your convenience.

Kindest regards,

James Cross Msc, Bsc (Hons), LCGI TP.
Strategic Sites Project Officer, Planning

T: 01903 737500 ext 37784

E: james.cross@arun.gov.uk

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