

[REDACTED]

Please upload the email below and the revised plans from the applicant onto Ocella for **BN/28/20/DOC** and **BN/30/20/DOC**.

I have completed the Action Sheet for you.

Thanks,

Michael

[REDACTED] or,

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Michael

Please find attached the following updated information in relation to the DOC applications BN/28/20/DOC and BN/30/20/DOC:

Drainage Maintenance & Management Plan Angels Nursery (Rev 2)
Drawing 19812-GS-Z1-XX-DR-C-1060-P2
Drawing 19812-GS-Z1-XX-DR-C-1061-P2
Drawing 19812-GS-Z1-XX-DR-C-5101-P3_Private Drainage Construction Details Sheet 1
Drawing 19812-GS-Z1-XX-DR-C-5102-P3_Private Drainage Construction Details Sheet 2
Drawing 19812-GS-Z1-XX-DR-C-5103-P4_Private External Works Details
Drawing 19812-GS-Z1-XX-DR-C-5105-P5_Main Drainage Details
Drawing 19812-GS-Z1-XX-DT-C-5106-P2_Outfall headwall details
Drawing 7436 WC 001 Rev A Drainage Access Overlay
Drawing 27295 R1 Coordinated Boundary Plan (which is provided for information).

The Drainage Statement and Site Plan previously submitted is unchanged and still forms part of the application pack, as the principles of the drainage strategy remain consistent, but greater detail is provided in the information.

I would like to remind everyone of the requirements of the conditions:

BN/28/20/DOC

Condition 8:

The development layout shall not be agreed until such time that arrangements for the future access and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site has been submitted and approved in writing by the Local Planning Authority. No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities of any watercourse on or adjacent to the site.

This condition has already been discussed at length, notwithstanding the planning merits of the condition, Redrow Homes have provided drawings that demonstrates there is a 3m clear access to the top of the ditches that are retained to the south, west and east of the site. There is no reason for this DOC application to be delayed whilst there is consideration of BN/30/20/DOC.

BN/30/20/DOC

Condition 3:

Development shall not commence 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, the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

Our engineers have responded to Mr Cann's comments, the drainage statement remains unchanged and the further detailed drawings that support this are now before the Council for consideration to satisfy this condition.

Condition 5:

The development shall not proceed until formal consent has been approved in writing from the Lead Local Flood Authority (WSSC) or its agent (ADC) for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourse on the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run off values.

Redrow would highlight that a separate application has been made for Ordinary Watercourse Land Drainage Consent. This was submitted at the same time as the discharge of condition application. We presume Arun District Council will coordinate the approval of the condition and OWC at the same time.

Condition 6:

Development shall not commence until full details of the maintenance and management of the SuDS 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 (a) details of financial management of the site including arrangements made in the event that the management company (or any subsequent management company) is no longer able to fulfil its duties; and (b) arrangements for the replacement of major components at the end of the manufacturers recommended design life.

The engineers have responded to Mr Cann's comments and the SUDs maintenance and management plan is before the Council for consideration to satisfy this condition. It is important to note that Condition 7 of the consent requires this document to be updated and approved prior to commencement.

Condition 16:

Prior to the commencement of the development hereby approved, a detailed level survey of the site including existing and resulting ground levels and the slab levels of the building the subject of this approval, shall be submitted to and approved by the Local Planning Authority. The development shall proceed only in accordance with the details thus approved and there shall be no subsequent raising of levels without prior written approval of the Local Planning Authority.

A number of detailed level surveys have been submitted to the Council both in relation to this application and others which have been approved. Information relating to the finished levels (buildings, covers, roads) are also before the Council for consideration to satisfy this condition. The issues in relation to land raising are set out below.

The requirements for the drainage scheme have been made relatively clear, with a request for specific falls on drains within the scheme. With a fixed point of connection (the level of the existing sewers or outfalls into existing ditches) and a requirement to meet a specific gradient or fall, when utilising gravity there is only one solution – and that is to increase the levels. The use of pumping stations is not favoured by anyone, as these can potentially fail and they are not a sustainable solution, which is why Redrow (and Wates before) have sought to increase levels and utilise a gravity fed system.

Having reviewed all matters in relation to drainage, in the context of all the approvals on this site and the application BN/57/20/DOC for the adjoining site by Matthew Homes, it is important that the Council is aware of the following (particularly in relation to the Council's request for no levels to be increased on the site):

BN/42/15/DOC. A discharge of condition application relating to the implemented 86 unit consent (determined by Mr Crowther, who I understand is still with the Council), includes a drainage strategy by WSP dated October 2015. This drainage strategy has been approved by the Council. The table below summarises a selection of the approved cover levels for drainage compared against those proposed by Redrow Homes:

	Approved and Implemented Scheme	Proposed by Redrow	Difference
South West Corner	9.78m AOD	9.55m AOD	23cm lower than approved
North West Corner	9.05m AOD	9.15m AOD	10cm higher than approved
Access Road	9.75m AOD	9.025m AOD	72.5cm lower than approved

As you will note Redrow are reaching similar levels above ordnance datum to those that the Council have already approved.

BN/44/15/DOC. Another discharge of condition application relating to the implemented 86 unit consent, includes a remediation strategy GESL GI Report GE10423-GIR-JO01-140910 dated December 2015 which confirms that the ground levels across the site will be increased by a minimum of 600mm. This document has been approved by the Council. This is to deal with remediation required on the site. Redrow Homes have worked on the basis of this approved remediation strategy.

BN/43/16/PL. The first full consent for 95 homes was accompanied by a Drainage Strategy which again sets out cover levels that are of the same order proposed by Redrow Homes. The DOC application before the Council relates to a scheme built around the principles of this consent and the accompanying Drainage Strategy.

Finally in relation to relevant planning matters, the application by Matthew Homes (BN/57/20/DOC) includes land raising by up to 1m in some locations. We presume this is for the same reasons Redrow has felt it necessary to increase levels on the site.

Based on the above, the Council's request for no land raising appears to be unjustified and completely at odds as to what has already been approved by the Council (and forms part of an implemented consent that could be continued to raise levels if necessary). The Council's request also appears to run contrary to what is being requested by the

drainage team (a preference for a gravity system at specific falls), and does not appear to have considered the proposed level changes being put forward on the adjoining site.

I trust that the information provides the necessary updates required and the Council are able to view this in the context of the approvals already in place on the site for raised levels, which will allow them to reach a positive determination in relation to the DOC applications. If there are any issues, or the Council feels they are not able to approve the applications, please contact me as a matter of urgency.

Kind regards

Craige

Craige Burden
Head of Planning



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