

Recommendation Report for Planning Permission

REF NO: BN/50/18/PL

LOCATION: The Fallows
Highground Lane
BARNHAM
PO22 0BT

PROPOSAL: Erection of 1 No. replacement dwelling & conversion of existing out building (approved dwelling) into double garage.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	It is proposed to convert the existing garden outbuilding into a new double garage with storage and then to construct a new two storey, four bedroom dwelling of part two and part one storeys. Access will be as per the existing arrangements.
SITE AREA	1 hectare.
RESIDENTIAL DEVELOPMENT DENSITY (NET)	1 dwelling per hectare.
TOPOGRAPHY	Predominantly flat.
TREES	None affected by the proposed development.
BOUNDARY TREATMENT	The site is well screened by hedging/tree screening over 3m and by timber fencing (circa 2m) to the boundary with The Cottage but is currently open to the garden of Meadow View.
SITE CHARACTERISTICS	Large grassed site with trees and hedging to the boundaries only. Existing single storey detached garden outbuilding (with permission to be a dwelling) in the southwestern corner. The northernmost boundary is with the railway line.
CHARACTER OF LOCALITY	Rural. Mainly formed of open land with some detached dwellings with large gardens, a few holiday cottages also exist nearby. There are no public footpaths and Highground Lane is a non metalled, non-adopted highway. The nearest dwellings are to the south and are both chalet bungalows and are 53-54m away.

RELEVANT SITE HISTORY

BN/40/18/CLP	Lawful development certificate for the proposed erection of 2 No. side extensions & 1 No. rear extension following construction of new roof permitted under planning permission BN/16/18/HH.	PP Not Required 29-08-18
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BN/16/18/HH	New pitched roof to provide rooms in roofspace	ApproveConditionally 22-06-18
BN/8/17/PL	Change of use of outbuilding to 1 No. dwelling. This application is a Departure from the Development Plan.	Refused 23-06-17 Appeal: Allowed+Conditions 20-02-18
BN/14/14/CLE	Application for a Lawful Development Certificate for the existing use of land to rear of house as garden.	Approve 22-04-14

A certificate of lawfulness for 'Use of land to rear of house as garden' was granted on 22 April 2014 under reference BN/14/14/CLE. The description of that site included reference to the garden outbuilding. Subsequently, permission was granted on appeal under BN/8/17/PL for the change of use of the outbuilding to a separate dwelling. This was then followed by two further applications to add accommodation within the roof and to provide extensions to the rear and sides.

REPRESENTATIONS

REPRESENTATIONS RECEIVED:

Barnham & Eastergate Parish Council

"At a meeting of Barnham Parish Council held on 3rd December the Council resolved to raise no objection to this application."

COMMENTS ON REPRESENTATIONS RECEIVED:

Noted.

CONSULTATIONS

Southern Water Planning

Engineering Services Manager

Engineers (Drainage)

Network Rail

CONSULTATION RESPONSES RECEIVED:

NETWORK RAIL - No response.

SOUTHERN WATER - State that they would not support proposals for septic tank or private treatment plant in the presence of public foul sewerage network in the close vicinity of the development site. Recommend an informative to this effect.

ADC DRAINAGE ENGINEERS - State that soakaways must be investigated for surface water disposal and recommend a standard condition.

COMMENTS ON CONSULTATION RESPONSES:

In response to the comments of Southern Water, the applicant confirmed by email (07/12/19) that foul drainage will be by way of a connection to the existing sewer.

The applicant has tried to avoid the need for the drainage condition by submitting details of groundwater infiltration testing and a soakaway design. However, although the groundwater infiltration testing data is acceptable, the Councils engineers have not been able to agree the details of the surface water system design. Therefore a revised condition has been agreed with the applicant which removes the requirement to provide groundwater monitoring data.

POLICY CONTEXT

Designations applicable to site:

Outside the Built Up Area Boundary;
Lidsey Drainage Catchment Area;
Advert Special Control Area; and
No Public Sewer On Site.

DEVELOPMENT PLAN POLICES

[Arun Local Plan 2011 - 2031:](#)

CSP1	C SP1 Countryside
DDM1	D DM1 Aspects of form and design quality
DDM2	D DM2 Internal space standards
DDM4	D DM4 Extensions&alter to exist builds(res and non-res)
DSP1	D SP1 Design
ECCSP2	ECC SP2 Energy and climate change mitigation
ENVDM5	ENV DM5 Development and biodiversity
HSP1	HSP1 Housing allocation the housing requirement
QEDM2	QE DM2 Light pollution
QESP1	QE SP1 Quality of the Environment
SDSP1	SD SP1 Sustainable Development
SDSP1A	SD SP1a Strategic Approach
SDSP2	SD SP2 Built-up Area Boundary
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TSP1	T SP1 Transport and Development
WDM1	W DM1 Water supply and quality
WDM2	W DM2 Flood Risk
WDM3	W DM3 Sustainable Urban Drainage Systems
WMDM1	WM DM1 Waste Management
WSP1	W SP1 Water

[Barnham & Eastergate Neighbourhood Plan 2014](#)
[POLICY ES1](#)

Applications for new development must meet the local drainage requirements

Barnham & Eastergate Neighbourhood Plan 2014 POLICY ES4	Protection of open views
Barnham & Eastergate Neighbourhood Plan 2014 POLICY ES6	Contribution to local character
Barnham & Eastergate Neighbourhood Plan 2014 POLICY ES8	Buildings should be designed to reflect the three-dimensional qualities of traditional buildings
Barnham & Eastergate Neighbourhood Plan 2014 POLICY ES11	Energy efficiency of new development
Barnham & Eastergate Neighbourhood Plan 2014 POLICY GA1	Connection to sustainable transport
Barnham & Eastergate Neighbourhood Plan 2014 POLICY GA4	Parking and new development
Barnham & Eastergate Neighbourhood Plan 2014 POLICY H2	Windfall sites
Barnham & Eastergate Neighbourhood Plan 2014 POLICY H4	Integration of new housing into surroundings
Barnham & Eastergate Neighbourhood Plan 2014 POLICY H5	Outdoor space
Barnham & Eastergate Neighbourhood Plan 2014 POLICY H6	Attention to detail
Barnham & Eastergate Neighbourhood Plan 2014 POLICY H7	Drainage for new housing

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Neighbourhood Development Plan

Where applicable, Neighbourhood Development Plan's (more commonly known as a neighbourhood plan or NDP), once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under

the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to conflict with the relevant policies within the Arun Local Plan in that the site lies outside the built up area boundary where new residential development is not appropriate. However, the proposal does not conflict with the Barnham and Eastergate Neighbourhood Plan which does not have a built up area boundary policy and which allows residential infill & redevelopment schemes across the Parishes.

OTHER MATERIAL CONSIDERATIONS

It is considered that the presence of the planning permission granted on appeal (ref BN/8/17/PL) for the change of use of the garden outbuilding to a dwelling and also the subsequent consents (refs BN/16/18/HH & BN/40/18/CLP) which allow accommodation in an enlarged roof and side/rear extensions are an important material consideration in the determination of this planning application as they establish the principle of residential development on the site and also represent an approved 'fall-back' position. This is elaborated on further in the Conclusions section.

CONCLUSIONS

PRINCIPLE:

The development plan for the Arun District currently comprises the Arun Local Plan 2011-2031 (ALP), the Barnham and Eastergate Neighbourhood Development Plan and the West Sussex Waste and Minerals Plans.

The application site lies outside of the defined settlement boundary as shown within the ALP and therefore falls within countryside. Policy C SP1 states that development in the countryside will only be permitted where it relates to certain criteria. The proposal does not meet any of the stated criteria and therefore would be unacceptable in principle.

It is also necessary to consider the policies of the Barnham & Eastergate Neighbourhood Development Plan (BENDP). The BENDP was made (adopted) in July 2014 on the basis of the saved policies in the 2003 Arun District Local Plan and the draft policies in the 2014 publication version of the emerging Arun Local Plan. The BENDP does not set a built up area boundary and policy H2 allows for the development of small residential developments on infill and redevelopment sites within the parishes. The policy does not state that these must be within the built up area boundary.

Section 38 (5) of the Planning and Compulsory Purchase Act 2004, states that: "If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document". Therefore, the conflict between policy H2 of the BENDP and policy C SP1 of the ALP would be resolved in favour of the ALP.

THE FALL-BACK POSITION:

It is clear therefore, that the proposal would be in conflict with the development plan in respect of new residential development within the countryside. However, Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise." In this case, it is considered that there are material considerations that indicate that a decision can be taken not in

accordance with development plan policy on new residential development within the countryside.

As set out above in the "Other Material Considerations" section, planning permission exists for the change of use of the existing garden outbuilding to a dwelling. There are also extant consents to allow this building to have a new roof with roof level accommodation and to be extended to both sides and its rear. The effect of these permissions would be to create a one and a half storey dwelling with three bedrooms.

The permission to change to a dwelling granted under BN/8/17/PL expires on the 20th February 2021 and there are no conditions that require approval prior to the use commencing. Therefore, the use can be implemented even if this planning application were refused. This represents an important 'fall-back' position.

The fall-back position draws support from the *Gambone v SSCLG* EWHC 952 (Admin) judgement which identified the two-stage approach to be adopted. The first is to decide whether or not the way in which the land may be developed is a material consideration in circumstances where there is 'a greater than theoretical possibility' that the development might take place. In a similar example of planning pragmatism, the judgement in *Ahmed v SSCLG* (2014) confirms the principle that a decision maker (in that case an inspector) can consider an alternative scheme as a fall-back. Several points of note in respect of the Ahmed case:

- (a) There had been a planning permission for a different scheme, which was acknowledged as an acceptable scheme;
- (b) The effects of the Ahmed judgement on this application are that there is a permitted alternative residential development scheme against which, through relatively minor changes to the size, creates a more positive outcomes against general planning principles;

The Council has also recently accepted this approach on two other applications (BN/61/16/PL and BN/48/18/PL) in the Barnham area. In the case of BN/48/18/PL, the officers report stated that

"Whilst it is clear that the proposal is in conflict with the policies of the most up-to-date part of the development plan (the Arun Local Plan), it is considered that there is no increase in the number of proposed dwellings proposed compared to the approval granted by BN/22/18 and that therefore, there is a viable fall back position to consider. The result of this is the same as it was in BN/61/16/PL and therefore the principle of residential development on the site has already been established. If this application were refused then the applicant would be able to implement the BN/22/18 proposal and achieve the same result albeit with a single residential building and less curtilage land."

There is not considered to be any material difference between the arguments made in respect of that application and those that apply to this application. On this basis, it is considered that the fall-back position is a material considerations that indicates that a decision can be taken not in accordance with development plan policy on new residential development within the countryside. The rest of this report will now consider the proposal against the other relevant policies of the development plan.

DESIGN & VISUAL AMENITY:

Arun Local Plan policy D DM1 requires that the Council have regard to certain aspects including Character, Appearance/attractiveness, Density and Scale.

Furthermore, policy D SP1 "Design" states that:

"All development proposals should seek to make efficient use of land but reflect the characteristics of the

site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal."

BENDP policies ES5 (Quality of design), ES6 (Contribution to local character), ES8 (Buildings should be designed to reflect the three-dimensional qualities of traditional buildings), H4 (Integration of new housing into surroundings) and H6 (Attention to detail) are all considered to be relevant. These set out requirements for high quality design, the early integration of building features & details and development that reflects the design & character of surroundings.

The new dwelling will be significantly larger in footprint, scale and bulk than that which could be implemented through the existing planning permissions. However, the house is to be sited in a position over 50m from the nearest residential dwelling and also more than 170m from the Highground Lane streetscene. It will therefore not be visible in the streetscene and will also have only a limited impact on the views from nearby houses. It is also noted that there are two nearby footpaths that offer views of the site and that although the railway line is to the north, it is well screened by trees.

The site also benefits from an existing access that will not be altered. Therefore, although the proposal is back land in nature, there is not considered to be any harmful change to the character or appearance of the streetscene or, due to the existing screening around the site, to the character of surrounding land.

The proposed curtilage is considered to be large. However, it already has consent as garden by virtue of the Certificate of Lawfulness (BN/14/14/CLE) and is the same curtilage as approved by application BN/8/17/PL.

There are no changes proposed to the garden outbuilding other than the addition of garage doors to the front in place of the existing glazed doors/windows. This is not considered to result in any harm.

The proposal is therefore considered to be in accordance with the above listed development plan policies.

RESIDENTIAL AMENITY:

Arun Local Plan policy D DM1 requires the Council have regard to certain aspects when considering new development including: (3) Impact - "Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance." Arun Local Plan policy QE SP1 states that: "The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity".

As noted above, the proposed dwelling will be more than 50m from either of the two chalet bungalow dwellings to the south. This is more than sufficient in distance terms to ensure that the amenity of the 4se two neighbouring dwellings is protected. The new dwelling will result in the intensification of the existing access track which passes by several other residential dwellings. However, it is not considered that the intensification is significant and as such there will be no harm to these existing dwellings.

The proposal is therefore in accordance with ALP policies D DM1 and QE SP1.

HIGHWAY ISSUES:

Arun Local Plan policy T SP1 seeks to ensure that development: provides safe access on to the highway network; contributes to highway improvements & promotes sustainable transport, including the use of low

emission fuels, public transport improvements and the cycle, pedestrian and bridleway network. Policy T DM1 requires that new development be located within easy access of established non-car transport modes/routes.

Policy GA1 of the BENDP states that: "New developments should integrate with the current green infrastructure network and provide access to public and community transport, to connect with the social, community and retail facilities of the villages."

Furthermore, policy GA4 states that "Development proposals will be supported only if they include the maximum level of off-street parking consistent with the current standards under the Local Plan. Developments that reduce the amount of off-street parking currently available will only be supported if they make enforceable provision for equivalent off-street parking nearby. Parking spaces provided in connection with such proposals will be required to be made available in perpetuity."

NPPF para 108 states: "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: (b) safe and suitable access to the site can be achieved for all users". Regard should also be had to paragraph 109 which states that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The proposal utilises the existing access and it is not considered that it will materially intensify this access to such a degree as to cause harm to the safety or convenience of Highground Lane. Furthermore, the proposal complies with the West Sussex Parking Demand Calculator in that it proposes a double garage with additional off-street hardstanding and the anticipated demand is 3 cars.

The proposal therefore complies with the above development plan policies.

INTERNAL & EXTERNAL SPACE STANDARDS:

ALP policy D DM2 states: "The planning authority will require internal spaces to be of an appropriate size to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance". It is therefore necessary to assess the proposal against internal space standards set out in the Governments Technical Housing Standards (Nationally Described Space Standard) to determine if the building is suitable for residential use.

The requirement for a two storey, four bedroom, 8 person house is 124m². However, the proposed floor area is around 441m² and therefore far exceeds the expected standards.

Policy D DM1 refers to the need for compliance with the Arun Design Guide. This is to replace policy D DM3 "External Space Standards" which was deleted at the request of the Local Plan Inspector. Until such time as this Design Guide is published, there is no policy within the Arun Local Plan regarding private gardens sizes.

However, regard should be had to paragraph 127 of the NPPF which requires that new development has a high standard of amenity for existing and future users. In addition, policy H5 of the BENDP states that "Proposals for new housing development should include good quality outdoor amenity space - either private gardens or a shared amenity area."

The proposed house will have a large private rear garden which is considered to have a useable area and it is therefore considered that the scheme provides a good standard of amenity for future occupiers.

It is therefore considered that the proposal complies with Arun Local Plan policies D DM1 & D DM2 and

the guidance on amenity within the NPPF.

SUMMARY:

Although this proposal seeks permission for one new dwelling in the countryside and is in principle inappropriate, regard should be had to the permitted fall back position in terms of the existing consents for change of use and extension of the garden outbuilding in to a dwelling. For this reason, the principle of the development is considered to be acceptable. The above report concludes that there is no harm to the character of the area from the increased size of the dwelling. Furthermore, all other issues are either dealt with in the above conclusions or through the assessment of the application by consultees. It is therefore recommended that permission is granted subject to the following conditions.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans and details:

Drawing 1 Location Plan;
Drawing 3 Block Plan (revised version received 07/11/18);

Drawing 5 Adaption of Existing Dwelling into Garage;
Drawing 6 Proposed Floor Plans;
Drawing 7 Proposed Elevations;
Two colour sample images of Purbeck Buff Cropped Walling (proposed material for walls of the new house); and
Micro Drainage Calculations dated March 2019 (as received 25/03/19).

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policies D DM1, D SP1, T SP1 and QE SP1 of the Arun Local Plan.

- 3 Within 2 months of the occupation of the new dwelling, the existing outbuilding shall be converted into the proposed double garage building in accordance with drawings 3 (Proposed Site Plan - received 07/11/18) and 5 (Adaption of Existing Dwelling into Garage). The approved garage building shall thereafter be maintained for the purposes of the garaging of vehicles and other related domestic storage.

Reason: In order to ensure that there is only one dwelling on the site and that there is also sufficient parking spaces for the use in accordance with policies C SP1, T SP1, D DM1 and QE SP1 of the Arun Local Plan.

- 4 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. 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.

- 5 Prior to occupation of the dwellings, a scheme for the provision of facilities to enable the charging of electric vehicles to serve the approved dwelling shall be submitted to the local planning authority for approval and thereafter implemented in accordance with the approved details and the charge point/s shall thereafter be permanently retained and maintained in good working condition.

Reason: New petrol and diesel cars/vans will not be sold beyond 2040, and to mitigate against any potential adverse impact of the development on local air quality, in accordance with policy QE DM3 (c) of the Arun Local Plan, the Arun District Council Electric Vehicle Infrastructure Study (November 2017) and the National Planning Policy Framework.

- 6 No part of the development shall be first occupied until the access driveway and turning spaces have been constructed in accordance with the approved site plan. The turning areas shall thereafter be retained for their designated use.

Reason: To provide adequate turning space for the development in accordance with policies D DM1 and T SP1 of the Arun Local Plan and paragraphs 108-110 of the NPPF.

- 7 The new dwelling shall not be occupied unless and until the applicant has submitted a scheme for approval by the Local Planning Authority to demonstrate that the dwelling will incorporate decentralised, renewable and low carbon energy supply systems. The approved scheme shall thereafter be implemented prior to occupation of the dwelling and any approved renewable energy supply systems shall be permanently retained & maintained in good working order

thereafter.

Reason: To ensure that the development is energy efficient and in accordance with policy ECC SP2 of the Arun Local Plan.

- 8 No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The scheme should seek to conform with the recommendations within BS5489:1-2013 but also minimise potential impacts to any bats using the trees, hedgerows and buildings by avoiding unnecessary artificial light spill through the use of directional light sources and shielding. The lighting approved shall be installed and shall be maintained in accordance with the approved details.

Reason: In the interests of the amenities of the area, the site biodiversity (particularly in respect of bats), the interests of minimising crime and to minimise unnecessary light spillage outside the development site in accordance with policies QE SP1, QE DM2 & ENV DM5 of the Arun Local Plan.

- 9 No removal of trees, shrubs or other vegetation that may contain birds' nests shall take place between 1st March and 31st August inclusive, unless a suitably qualified ecologist/wildlife specialist has undertaken a careful, detailed, check of vegetation for active birds' nests immediately before the vegetation is cleared and confirmed that no nests will be harmed. Where nests are discovered, the vegetation shall remain in place until nesting activity has ended naturally and the ecologist has confirmed that it is safe to proceed.

Reason: To prevent interference with the breeding success of wild birds in the interests of biodiversity conservation, as well as to ensure compliance with the legal protection of birds, their nests and eggs under Section 1 of the Wildlife and Countryside Act 1981, as amended and in accordance with policy ENV DM5 of the Arun Local Plan.

- 10 The first floor bathroom windows on the flank and rear elevations of the building shall at all times be glazed with obscured glass.

Reason: To protect the amenities and privacy of the future occupiers in accordance with policies D DM1 and QE SP1 of the Arun Local Plan.

- 11 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

- 12 INFORMATIVE: 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.

- 13 INFORMATIVE: A formal application for connection to the public sewerage system is required in order to service this development, please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk. Please read our New Connections Services Charging Arrangements documents which is available to read on our website via the following link <https://beta.southernwater.co.uk/infrastructurecharges>.