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

Sent: 17 August 2021 18:04

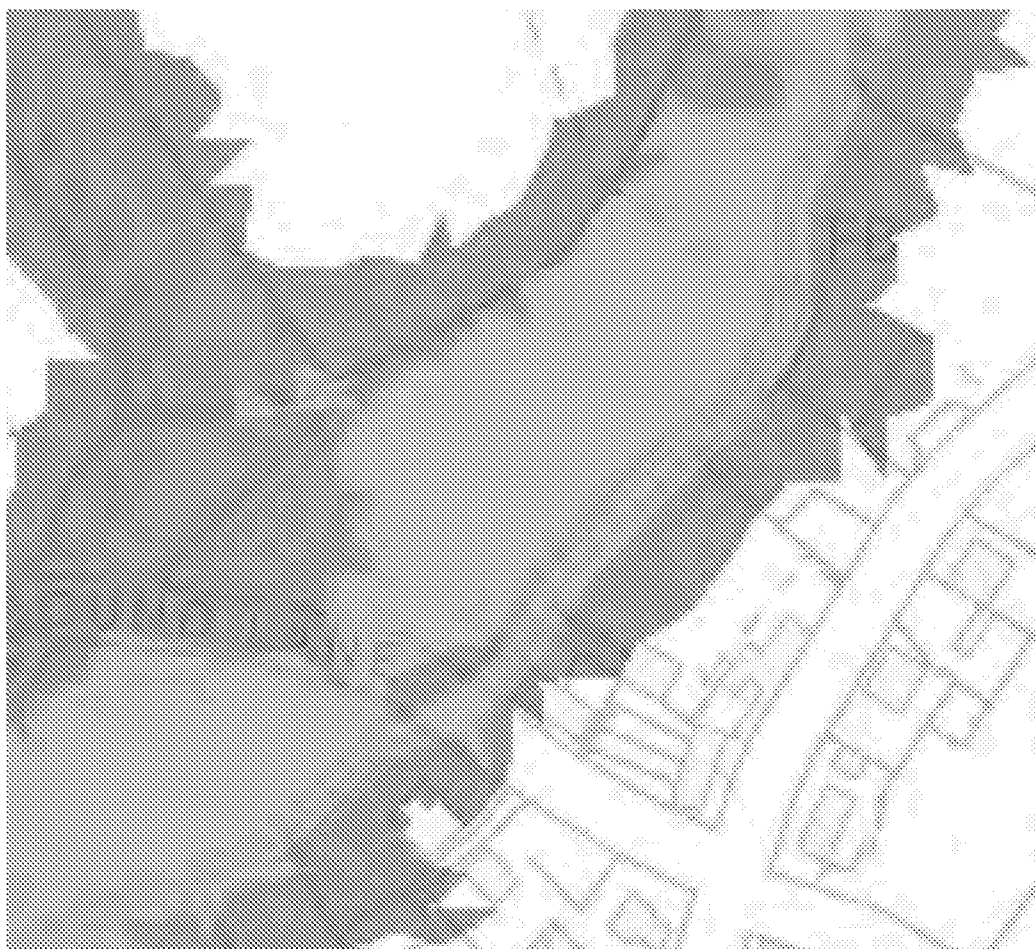
To: Planning.Responses <Planning.Responses@arun.gov.uk>

Cc: Amber Willard <Amber.Willard@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>

Subject: RE: Planning Consultation on: BN/93/21/PL

Engineers Comments Regarding Surface Water Drainage

The FRA for this application appears to have significant omissions and errors. Part of the application site (where part of the proposed dwelling is proposed) appears to be classified as functional flood plain Flood Zone 3b ([Arun SFRA mapping](#), sheet 22 of 48).



This is land “where water has to flow or be stored in times of flood. This zone is generally defined as the land which would flood with an annual probability of 1 in 20 (5% AEP) or greater in any year” (this is the case for the Arun District). As shown in the applicant’s FRA “Only the water-compatible uses and the essential infrastructure listed in Table 2 that has to be there should be permitted.” As the development is for “More Vulnerable” use as a dwelling house Table 3 Flood Risk Vulnerability and Flood Zone ‘compatibility’ shows that **development should not be permitted**.

Furthermore the FRA does not appear to have evidenced an appropriate sequential test (as required for all sites in Flood Zone 3) to show that there are no reasonably available alternative sites for the development to be located.

The FRA states that “overall risk of surface water flooding to the site varies from ‘low’ to ‘high’ with the maximum flood depth less than 300mm”. EA Mapping shows that maximum flood depth (for 1 in 1000 year event) is up to 600mm, for a 1 in 100 year event the maximum flood depth is 300mm. The FRA also states that there are no records of historic flooding at the site. However, our mapping (supplied by the EA) clearly shows the site within the Historic Flood Map for Arun District. The FRA also states that the previous land owner was “not aware of any flooding issues at the site”. This is a direct contradiction of public representations (of objection) to the application at least one of which offering evidence. It is suggested that the Planning Officer obtain any evidence of flooding from these members of the public should they be minded to refuse the application (as it could be used as evidence in the case of appeal).

The FRA makes no reference to land raising which would be a critical consideration in terms of assessment of flood risk impacts on and off-site. It would appear that the proposed development will be elevated on piers thus allowing flood water to flow beneath and around the dwelling, access and egress from the dwelling during times of flood does not appear to be considered. We would want the applicant to show existing and proposed ground levels to ensure that no ground raising is carried out on the site to minimise inconvenience of flooding. If ground raising IS proposed then

appropriate compensatory storage would need to be provided and agreed with ourselves and the EA.

It also appears that car parking with an electrical charging point is being proposed at ground level within the functional flood plain or Flood Zone 3a. This does not seem logical or appropriate.

No groundwater monitoring has been undertaken for the site, however we would expect groundwater to be high and this will influence flood risk and the drainage strategy.

A culverted watercourse crosses the site and any proposal to connect to, divert or make any alterations to this will require Ordinary Watercourse Land Drainage Consent.

The applicant states that surface water runoff from the site will be improved by implementing appropriate SuDS. Yet SuDS should not be located in functional flood plain and we avoid locating SuDS in Flood Zone 3 as the drainage features will likely become inundated with fluvial water and in this case surface water.

On the basis of the above I wish to **object** to this application. I do not believe enough evidence has been supplied to show that flood risk will not be increased on or off-site as a result of the development, nor that it has been proven that this is an appropriate location for development through the application of the sequential test.

In order to overcome my objection the FRA would need to be updated to account for the omissions and discrepancies described above. Furthermore, I would expect all surface water drainage design to be agreed prior to determination, with appropriate winter groundwater monitoring and infiltration testing. The surface water drainage design would have to show that flooding would not be increased on-site or off-site for the lifetime of the development with appropriate allowances made for climate change and urban creep.

If you are minded to approve the application, despite my objection, I would ask that the following conditions are applied to attempt to minimise the likely increase in flood risk on or off-site as a result of the development.

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 [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."

PCENG03

"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:

INFORM02

"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."

Sarah Burrow
Engineering Assistant, Engineering Services

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

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 13 July 2021 13:34

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: BN/93/21/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: BN/93/21/PL

Registered: 8th July 2021

Site Address: Land off Highground Lane Barnham PO22 0BJ

Grid Reference: 495573 103785

Description of Works: 1 No. 5 bed detached dwelling with ancillary parking and bin storage. This application is in CIL Zone 3 and is CIL liable as new dwelling.

The Council have received the above application.

[Click here to view the application details](#)

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 12th August 2021. You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning

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 the leaflet how to respond to planning applications <https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

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://www.planningportal.co.uk/info/200207/appeals> 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

Amber Willard

Planning Officer- Arun District Council

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PLCONSULT (COB) 2020