

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 08 June 2021 15:01
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/124/21/OUT

Dear Simon,

Thank you for consulting us on this application and apologies for the delay in response, I hope you will still be able to consider and utilise my comments for your report and decision.

Engineers Comments Regarding Surface Water Drainage

This site is entirely located within Flood Zone 3, in an area of moderate risk of surface water flooding (within the 1 in 100 year event flood water extent) and in an area formerly managed by the Internal Drainage Board due to the sensitive nature of the drainage in the area. We are also aware of historic flooding in Hook Lane (June 2012). An exception test is required to determine if development is appropriate in this area.

All of these factors make it challenging, (if not impossible) to design a **sustainable** surface water drainage system for the site. Guidance (CIRIA SUDS Manual) states that SuDS should not be located in the Flood Zone, yet there are no alternative locations on this site. Hence, the applicant will need to demonstrate that their proposed solution does not lead to an increased risk of flooding to either the development itself or other existing properties. Our criteria (in italics) below is mentioned for the applicants benefit should they be able to overcome this issue.

The supplied FRA proposes an indicative surface water drainage strategy of discharging to the public surface water sewer in the southern portion of the site. We are in agreement that this is likely to be the necessary strategy, however would still expect to see evidence that infiltration is not viable on the site. In addition, irrespective of the method of surface water disposal we will also need to see a full winter's groundwater monitoring, this will be necessary to account for the risk of floatation in an attenuation system.

The FRA suggests restricting surface water discharge rates from the site to 5l/s, this is inappropriate and we would expect to see discharge rates restricted to 2l/s, which can be achieved without increased risk of blockage.

Existing and proposed trees (root protection zones) must not conflict with suds features/pipework. All existing and proposed tree root protection zones must be shown on the Drainage Layout.

A Southern Water public surface water sewer (as shown on the current Southern Water records) runs through the south of the site on the line of the former watercourse. Please consult Southern Water regarding the necessary easements from this sewer. Any proposed connection will also require their approval.

Any compensation to be provided, for the displacement of water within the fluvial flood plain will need to be agreed with the Environment Agency.

Areas of the site are also at risk of surface water flooding as shown on current mapping. This will also need to be considered as part of any overall flood compensation scheme, to ensure no increased risk of flooding as a result of the development.

It is understood that the FRA is due to be revised and we would certainly not want to see the current FRA listed as an approved document.

Under normal circumstances, and faced with the issues raised above I would normally be raising an objection to the application and expect the applicant to show that a workable sustainable drainage system can be achieved on the site in order to lift that objection. However, given that no objection was raised by ADC Drainage Engineers on application ref BR/139/18/OUT I will not do so here for the sake of consistency. The applicant and the planning officer should be aware that we have concerns as to whether an acceptable drainage solution can be found, which meets all the requirements of the WSCC LLFA Policy for the Management of Surface Water. If this cannot be achieved, then the conditions which I stipulate below will not be recommended to be discharged.

If you are minded to approve the application please apply the following conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

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.”

PCENG D4

“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.

Note: This response was agreed in consultation with Paul Cann, Principal Drainage Engineer.

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.

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

Sign up to our newsletter [here](#)



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

Sent: 05 May 2021 10:57

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

Subject: Planning Consultation on: BR/124/21/OUT

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Development Management Procedure) (England) Order 2015 - Article 5

Outline Consent

Application No: BR/124/21/OUT

Registered: 30th April 2021

Site Address: To rear of 94 - 100 Hook Lane Bognor Regis PO22 8AT

Grid Reference: 494296 99738

Description of Works: Outline application with all matters reserved except for access for demolition of existing bungalow to form new access and residential development of 6 No. chalet houses. This application affects the setting of the Upper Bognor Road & Mead Lane Conservation area.

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 4th June 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 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

Maria Tomalova

Planning Officer- Arun District Council

Telephone: 01903 737510

Email: maria.tomalova@arun.gov.uk

PLCONSULT (OD8) 2020