

From: Amanda Scholes on behalf of Planning.Responses
Sent: 03 November 2021 09:13
To: Planning Scanning
Subject: FW: Planning Consultation on: BR/242/21/OUT

AMANDA SCHOLES
PLANNING RECEPTIONIST



To register to receive notification of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>

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

Sign up to our newsletter [here](#)



From: Laura Gibbons >
Sent: 02 November 2021 13:46
To: Planning.Responses >
Cc: Simon Davis
Subject: RE: Planning Consultation on: BR/242/21/OUT

Engineers Comments Regarding Flood Risk and Surface Water Drainage

The application is within flood zone 3 and is at risk of surface water flooding. The FRA submitted details that it is proposed to raise the buildings above the predicted fluvial flood level, and to compensate for the loss of flood storage. No details on winter groundwater levels have been provided to evidence that excavating to achieve compensatory volume can be undertaken successfully, and that this volume will be free from groundwater. We also note that the compensatory volume is proposed to be located in the north of the site, it is unclear how this will link to the lower regions of the site, i.e. like for like levels volume compensation may not be achieved with these proposals as water would need to rise higher to get to the compensatory area.

The details regarding how it will be ensured that proposals do not increase the risk of surface water flooding are vague. It must be demonstrated that proposals will not increase the risk of surface water flooding for events up to and including the 1 in100 year plus 40% climate change event. Where pluvial flood extents and depths are not available for this return period event the 1000 year event should be used. The FRA states that discrepancies between Environment Agency LiDAR and topographic survey mean that on site pluvial flood risk is less than that depicted by strategic mapping. If the applicant is disputing the strategic mapping then they should complete a site

specific pluvial model, using LiDAR and topographic data, as per industry standard methodology. The emphasis is on the applicant to disprove strategic scale flood mapping.

Greater detail on predicted pluvial flood levels is required, along with proposed displaced volumes and compensation. As per NPPF 2021 updates, it must be evidenced that the development will be safe from all sources of flood risk and will not increase flood risk (considering all sources) elsewhere. Therefore the development must not displace flood water for events up to and including the 1 in 100 year +40% climate change event (compensatory volume is required in addition to the drainage requirements of the new development). Displaced volume should be clearly mapped, along with compensatory volume to show where these volumes will be stored so that the impact can be easily assessed by both ourselves and the Planning Officer. It is impossible to know if storage can be provided below ground as infiltration testing and groundwater monitoring have not been completed.

The surface water drainage strategy proposes attenuation within road sub-base, and a discharge rate of 5l/s. Infiltration testing and winter groundwater monitoring must be undertaken on site to demonstrate that the hierarchy is being followed. If attenuated discharge is required it should be limited to greenfield QBar for all events, or 2l/s if greenfield QBar is less than this. Surface water must not be stored in areas at risk of flooding, i.e. it should be stored outside of predicted fluvial and pluvial flood extents. It is unclear how a policy compliant surface water drainage solution can be delivered here.

Our records indicate there is a watercourse to the south of the site, this may be culverted. The applicant must evidence the exact location of this.

Give the above points we wish to raise a **holding objection** to this application. To overcome this objection the applicant should submit the following information:

1. Winter groundwater monitoring results.
2. A site specific assessment of pluvial flood risk.
3. Details of displaced pluvial volume, and compensatory pluvial volume.
4. A revised surface water drainage strategy with discharge limited to a maximum of 2l/s.
5. Details of the watercourse, and evidence that a minimum of a 3m clear buffer is provided within development proposals.

If you are however minded to approve this application then please apply PCENG D 2, PCENG D3 and PCENG D4.

Kind regards,

Laura Gibbons

Drainage Engineer

Engineering Services

Please note that I work Tuesdays 08:00-16:00 for Arun only.



From: Planning.Responses [REDACTED]

Sent: 19 October 2021 09:04

To: Land Drainage [REDACTED]

Subject: Planning Consultation On: BR/242/21/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/242/21/OUT

Registered: 11th October 2021

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

Grid Reference: 494296 99738

Description of Works: Outline application with all matters reserved except access for the demolition of existing bungalow to form new access for 6 No. detached chalet dwellings (resubmission following BR/124/21/OUT). This application may affect the setting of listed buildings & may affect the character & appearance 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 18th November 2021. You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

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 information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

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://app.planninginspectorate.gov.uk/> 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

Mr S Davis

Planning Officer- Arun District Council

[REDACTED]

[REDACTED]

PLCONSULT (ODS) 2020