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From: Maria Tomalova <Maria.Tomalova@arun.gov.uk>

Sent: 02 June 2020 15:04

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

Subject: FW: BR/57/20/DOC, Drainage Engineers comments

Please upload the below to the above application. Drainage Engineers comments

Thank you

Maria Tomalova | Senior Planning Officer, Directorate of Place, Arun District Council | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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From: Maria Tomalova

Sent: 02 June 2020 15:01

To: Daniel Vick <Daniel.Vick@arun.gov.uk>
Subject: BR/57/20/DOC, Drainage Engineers comments

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 22 May 2020 17:17
To: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: RE: Planning Consultation on BR/57/20/DOC

Hi Maria,

I am well thank you, I hope you are also? Yes, it is a fairly confrontational response, I think they are misinterpreting the scale of my requests. Only point 4 to cover off, my full response below (theirs in blue, my third response in green.)

Engineers Comments Regarding Surface Water Drainage

Condition 8:

2. The link pipes between the soakaways need to be surrounded in concrete and it is strongly advised that the applicant includes an inspection chamber on at least one of these pipes (please label this manhole/inspection chamber with invert and cover levels and cover type). Concrete surround specified, no inspection chamber. *In relation to point 2. My engineer says that there is no requirement or need to have inspection chambers on the link pipes. The link pipes are very short lengths and are encased in concrete therefore provide a sealed link between soakaways. The link pipes are short in length therefore putting a manhole on them will mean putting it on the fence line which is not practical. The manhole would then be push further to one side of the fence very close to the soakaway. This is just not practical or needed.* Fine. The inclusion was suggested by the Principle Drainage Engineer but was always a suggestion, the argument against is sound.
4. Please label soakaways with their invert levels, cover levels and cover types (not necessary if construction detail is kept on same drawing, in which case "see detail for levels" – only if moved to a separate construction details sheet, see below). This is still unclear, the existing topography shows ground level to be at 7.5 for most of the soakaway areas which will only provide 300mm of cover rather than the 400mm specified. Luckily this is acceptable with the chosen crates, however the note needs to be changed to reflect this. In addition, the levels on the site vary and yet the cover depth is uniform on the detail. It is assumed that the three soakaways will be set at the same base level 6.8. If this is the case, using the detail is sufficient, however the cover depth should be changed to reflect that it varies for the different soakaways. IE. Min 300mm and Min 700mm to the base of the soakaway. *We have provided the details of the soakaways as standard details. Generally the existing/proposed ground levels to the rear gardens is uniform at around 7.5m Yes it is accepted that the ground might vary 100mm across the site but the detail shows the worst case scenario of having a minimum cover of 300mm and the soakaways being all set at the same base level of 6.8m. I don't see why we have to specifically change the detail to show exact ground levels the detail is standard and the contractor will work with this and then adapt ground levels and covers to suit. It seems you are expecting the details to be spot on with levels but in reality there will be fluctuations of around 100mm on site. The detail provides the required information for the soakaways to be constructed to regulations and this will be adapted to ground conditions/levels on site which will be inspected by the building inspector and warranty provided. You do not need to show the exact ground levels (although that of course would be preferable, and in keeping with my first consultation) simply adding the word 'min' to the dimensions in question on the detail covers off this point so that it is understood that these will vary. I have already compromised on this by not standing firm on all levels being included on the drainage layout. If the construction detail is to be relied upon, then it needs to reflect all three soakaways. This is a simple adjustment and I have no idea why it is being argued.*

Condition 9

No site specific maintenance and management manual has been supplied to be assessed therefore it is not possible to recommend discharge of this condition.

It is noted that maintenance is discussed within this document, however, it does not meet the requirements of the condition. The applicant should supply a stand alone document intended to be read by the future residents and/or the maintenance company so that they can understand the basic surface water design strategy, how surface water is drained from the site, what components are used, how they are maintained, who is responsible for the maintenance, and how maintenance, repairs and replacement are funded. 'Should' and 'could' are not appropriate. The document should give clear direction of responsibility and also, if the system is to be maintained by a company, who will set it up, and what will happen if they do not carry out their duties, fold or do not have enough funding to carry out repairs/replacements. It is also noted that within this section the documents references two soakaways rather than three.

Finally in respect of condition 9. I find what you are asking for is completely unreasonable and not going to achieve anything. I attach a standard report that I have used with other local authorities to discharge maintenance conditions. The properties are being sold individually as freeholder owners. There is no management company therefore I am not providing details of funding for maintenance and schedule of works. The soakaway system is a self-contained system which does not require maintaining apart from general house keeping things the owners can do as set out in the attached document. I would never expect a home owner to start digging up and repairing a soakaway system of this nature as it would be very dangerous and not something I would advise. The system will be installed and be part of the 10 year warranty of the property. This will be maintained by the developer for the first 2 years and then the remaining 8 years by the insurance provider. If the system is failing to work then this would be dealt with by a claim on the 10 year warranty. Other than that the maintenance is restricted to the general stuff as highlighted in the report. That is it.

It is interesting that I have just looked at a scheme down the road which you granted consent for and although you put the same condition on the drainage design there was no condition relating to maintenance. It is very frustrating when I can build down the road with no maintenance manual required but this one I have to provide a full maintenance manual. This is unreasonable and the maintenance stuff provided is acceptable level of detail to discharge the planning condition. I can provide a full maintenance manual of 50 pages with various costings and schedules which will be pointless as no one will read it and it will have no relevance to the buyers as there is no management company. The maintenance requirements of the drainage systems will be part of the legal pack for each purchaser and part of the warranty and developers responsibilities post occupation.

The tone of the response to this request is noted and not appreciated. I can not comment about the conditions applied on other developments, indeed I did not request for this condition to be applied, my responsibility is simply to assess the submission with regards to the specified condition and give my advice to the planners. The submission up to this point did not constitute a Maintenance Manual and thus I have not been able to recommend discharge. The explanation of the management makes sense. At no point has it been specified the length of the document required, just the points that need to be covered within it. Given that there had previously been no explanation as to the responsibility for maintenance, I referred to the possibility of a maintenance company to give the most comprehensive consultation response possible to assist the applicant going forward. There is no requirement that a company is formed or used, it is reasonable that the homeowner be responsible, all that is asked is that this is clear. The attached report covers what has been asked for, however, this has not been submitted before now for assessment. It would benefit from the inclusion of the drainage layout, however as you have referred to the 'as built drawings supplied as part of the home owner manual' I will not pursue the matter. Maria, I am happy to recommend discharge of this condition.

Kind Regards

Sarah Burrow

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