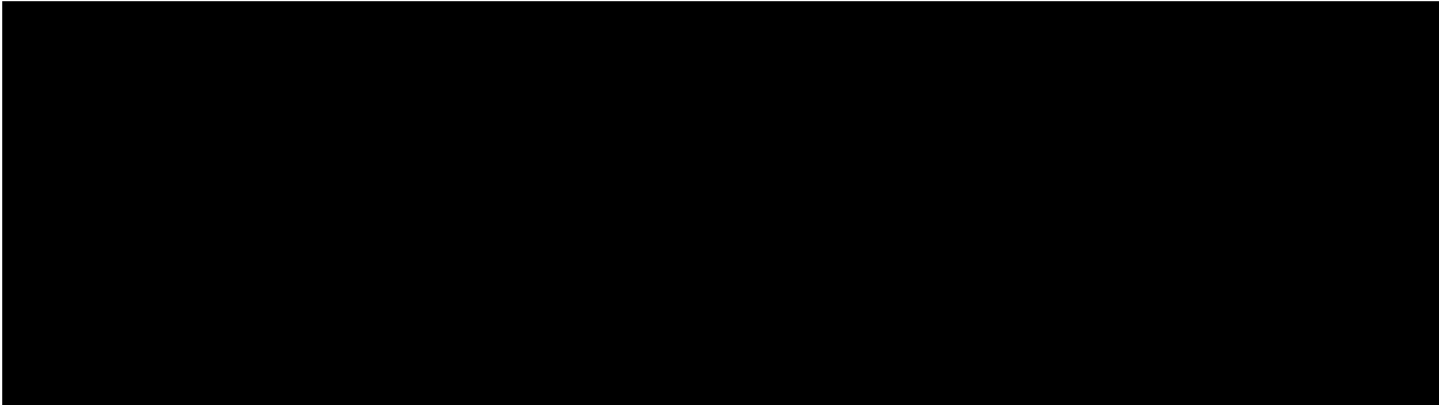




From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 14 June 2022 14:52
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/77/22/PL

Engineers Comments Regarding Surface Water Drainage

The hierarchy for sustainable drainage must be followed with infiltration fully investigated. Due to the likely ground conditions it is anticipated that if infiltration is viable it will require a large plan area as blanket solutions may be required and 5m easement from buildings to soakaways must be provided. We also stipulate a 2.5m easement from property boundaries to reduce the risk of conflict with neighbouring soakaways.

The proposed layout shows there is very limited space for surface water drainage, it appears that the proposals will not comply with West Sussex Lead Local Flood Authority Policy for the Management of Surface Water Policy 1. The supplied Drainage Statement even acknowledges that "There is no room to discharge the rainwater into soakaways on the site". This is an acknowledgement that the proposed layout and density of development precludes the use of infiltration, rather than the ground conditions on the site.

Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. Without winter groundwater monitoring and winter infiltration testing there is no way of determining the area take up required for an infiltrating surface water drainage solution. Leaving drainage design until after a decision has been made will likely unduly prejudice drainage design and not allow for the hierarchy for sustainable drainage to be followed.

Furthermore, inadequately considering drainage at this stage could potentially result in a lack of sufficient capacity being provided for surface water drainage and therefore the development could lead to an increased risk of flooding elsewhere.

Therefore, I object to the application.

To overcome my objection the applicant should complete winter groundwater monitoring and winter infiltration testing and complete calculations to assess the size of structures required. A rough plan should be formed showing where these structures can be provided within the proposed layout. Evidence that no pumping or ground raising would be also be required. Detailed design of the system can be left until discharge of conditions where the applicant should provide the level of information stated within our checklist [Drainage Planning Consultations | Arun District Council](#)

However, if you are minded to approve the application please ensure the following conditions are applied:

PCENG2

"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:

INFORMD

"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 infiltration tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method. All design storms must include a climate change allowance, as per <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>, on stored volumes or rainfall intensity. Infiltration structures must cater for the critical 1 in 10 year storm event, (plus 40%) between the invert of the entry pipe to the soakaway and the base of the structure. All surface water drainage designs must also have provision to ensure there is capacity in the system to contain the critical 1 in 100 year storm event (plus 45%).

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 groundwater table in support of the design. The applicant is advised to discuss the extend of ground water monitoring with the council's engineers.

Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application."

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



Monday-Friday: 8am - 2:30pm



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

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

Sent: 26 April 2022 10:34

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

Subject: Planning Consultation on: BR/77/22/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: BR/77/22/PL
Registered: 25th April 2022
Site Address: Rear of 42 Sudley Road Bognor Regis PO21 1ES
Grid Reference: 493596 99284
Description of Works: 2 No. semi-detached 3-storey houses with parking and new vehicular access. This application is in CIL Zone 4 and is CIL liable as new dwellings.

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 26th May 2022 . 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

Maria Tomalova

Planning Officer- Arun District Council

Telephone: 01903 737510

Email: maria.tomalova@arun.gov.uk

PLCONSULT (COB) 2020