

REPORT UPDATE

Application No: CM/18/21/PL

Reason for the Update / Changes

Reason for Update/Changes:

Comments have been received from the Council's Tree Officer. He is recommending that a Tree Preservation Order be imposed on a tree that is sited outside of the site boundary to the east. He has stated that he has no objection to the proposed development subject to the following condition.

11. Development shall not commence until the applicant has submitted the following reports and plans from an Arboricultural Consultant; to be approved in writing by the Local Planning Authority:

Arboricultural Impact Assessment (AIA) which must be inclusive of; a 'Tree Survey Schedule', a 'Root Protection Area (RPA) Schedule' and a 'Tree Constraints Plan' - with the trees accurately plotted on same.

In the event that a RPA of any tree which is proposed for retention overlaps the development then BS5837:2012 requires that the Detailed Planning Application is accompanied by an Arboricultural Method Statement (AMS) and also most importantly a Tree Protection Plan - to both describe and illustrate the mitigation measures which are to be employed to ensure that the trees survive without detriment to their vigour and vitality and are given adequate protection both above and below ground.

Reasons: To comply with BS5837 and to ensure that retained trees are afforded due respect and appropriate levels of protection such that their ongoing health and vitality is not compromised, and they can continue to enhance the landscape and amenity of the area.

12. No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding (including tree protection measures),
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),

Reason: In the interests of highway safety and the amenities of the area in accordance with policy TSP1 of the Arun Local Plan.

Notes: Changes to recommendations, conditions and / or reasons for refusal will always be reflected in the recommendation section of the attached Officer's Report.

Recommendation Report for Planning Permission

REF NO: CM/18/21/PL

LOCATION: Land adj Mistletoe Farm
Horsemere Green Lane
Climping
BN17 5QZ

PROPOSAL: Erection of 1 No. 3 bed dwelling. This application is within CIL Zone 3 and is CIL liable as new dwelling.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	Permission is sought for the erection of a chalet style three bed dwelling on land formally associated with Mistletoe Farm with the creation of a new vehicular access taken from Horsemere Green Lane. The site comprises a broadly rectangular parcel of land to the west of Mistletoe Farm, Horsemere Green Lane and formed part of its residential garden. Mistletoe Farm is a detached bungalow with elevations of render and brickwork set under a hipped tiled roof. The property is set deep in the plot, set back from the highway by approximately 25m.
SITE AREA	725 sqm
RESIDENTIAL DEVELOPMENT DENSITY	14 dph
TREES	None affected by the development. Existing boundary trees will be retained.
BOUNDARY TREATMENT	The site occupies a corner site with a frontage to Horsemere Green Lane to the north and Wooldridge Walk to the west. The boundary to Wooldridge Walk comprises conifer hedgerow with fencing set behind; fencing demarcates the site to 1 Wooldridge Walk to the south. Access to the site is across the highway grassed verge to Horsemere Green Lane via a field gate set in post and rail fencing.
SITE CHARACTERISTICS	Horsemere Green Lane is made up of a variety of residential properties. Whilst the majority of frontages are softened by landscaping, there is no overriding material used for site boundaries, giving a varied appearance to the street scene. The varied appearance extends to the properties which range from detached two storey properties to chalet style bungalows and bungalows of a mix of materials and detail.
CHARACTER OF LOCALITY	Residential properties to the east and west of the site. To the west are shallow pitched roofed detached bungalows. Open fields to the north of the site.

RELEVANT SITE HISTORY

CM/13/19/RES	Application for approval of reserved matters following outline approval CM/37/18/OUT for the redevelopment of site with 2no. 4 bed detached bungalows & associated works	ApproveConditionally 26-07-19
CM/37/18/OUT	Outline application with some matters reserved for the redevelopment of site with 2 no. 4-bed detached bungalows & associated works (resubmission following CM/10/18/OUT). This application is a Departure from the Development Plan.	ApproveConditionally 06-03-19
CM/10/18/OUT	Application for Outline planning permission with some matters reserved for redevelopment of the site with 1 No. 4-bed detached bungalow, 1 No. 3-bed detached chalet bungalows & 2 No. 3-bed semi-detached bungalows & associated works. Departure from the Development plan	Refused 28-09-18

CM/10/18/OUT was refused as it would represent an unacceptable encroachment of built form into the countryside as the number of dwellings would result in overdevelopment of the site at odds with the character and appearance of the locality.

CM/37/18/OUT granted permission for two dwellings. One was to the east of the existing Mistletoe Farm, one was to the rear. CM/13/19/RES granted reserved matters approvals pursuant to this outline.

REPRESENTATIONS

Climping Parish Council - Inadequate space on the small plot which cannot accommodate the size and footprint of the substantial chalet house. The proposed 2-storey chalet dwelling is overdevelopment and will be overbearing to the neighbouring properties contrary to Clymping Neighbourhood Plan Policy CPN 11. The driveway exits onto an already busy road (Horsemere Green Lane) within a few metres from a junction creating a potential safety issue. Should this application be approved, it is suggested that the upstairs windows should be conditioned to be obscured and fixed / restricted opening.

Six letters of objection on the grounds of:

- Would further negatively impact Mistletoe Farm and be out of character with the neighbouring one-storey houses.
- Over looking surrounding properties.
- Driveway better suited exiting to Wooldridge Walk instead of to Horsemere Green. For safety reasons.
- A two story dwelling is out of character.
- Likely to impact on privacy of residents in adjacent bungalows in Wooldridge Walk and Mistletoe Farm.
- Too much noise, pollution and road traffic.

2 letters of support

- One dwelling, rather than all large developments.

4 letters stating no objection.

COMMENTS ON REPRESENTATIONS RECEIVED:

These matters will be considered in the Conclusions section of the report..

CONSULTATIONS**CONSULTATION RESPONSES RECEIVED:**

WSCC Highways - do not consider this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network. The applicant has demonstrated sufficient visibility for the access, with visibility splays of 2.4m x 43m achievable either side of the access. Do not anticipate the addition of a dwelling would give rise to a significant material intensification of movements on the local highway network. Recommend conditions on access, parking, cycle parking and electric vehicle charging.

Ecologist - Prior to determination we require that an extended phase one habitat survey is undertaken on the site to determine if there is potential for protected species.

ADC Engineers - Do not wish to approve the Foul and Surface Water Drainage Report because of an absence of ground water monitoring. Request that a condition is attached requiring full details of a surface water drainage scheme.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted.

POLICY CONTEXT

Designation applicable to site:

Outside built up area.

DEVELOPMENT PLAN POLICIES[Arun Local Plan 2011 - 2031:](#)

TSP1	T SP1 Transport and Development
CSP1	C SP1 Countryside
DDM1	D DM1 Aspects of form and design quality
DSP1	D SP1 Design
ENVDM4	ENV DM4 Protection of trees
SDSP1	SD SP1 Sustainable Development
WDM3	W DM3 Sustainable Urban Drainage Systems

<u>Clymping Neighbourhood Plan 2015 Policy CPN11</u>	Quality of Design
Clymping Neighbourhood Plan 2015 Policy CPN12	Reducing the risk of flooding
Clymping Neighbourhood Plan 2015 Policy CPN14	Traffic and the Environment
Clymping Neighbourhood Plan 2015 Policy CPN8	Protection of Trees and Hedgerows

PLANNING POLICY GUIDANCE:

NPPDG	National Design Guide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Climping Neighbourhood Plan has been made and the relevant policies have been taken into account in the consideration of this application.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

Section 70(2) of TCPA provides that:-

(3) In dealing with an application for planning permission the authority shall have regard to:
 (a) the provisions of the development plan, so far as material to the application, a post-examination draft neighbourhood development plan, so far as material to the application,
 (b) any local finance considerations, so far as material to the application, and
 (c) any other material considerations.

The proposal is considered to conflict with relevant Development Plan policies in that the site lies outside the built-up area boundary where development or redevelopment is unacceptable in principle and is not considered to accord with policy C SP1 of the Local Plan.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background. These are that the proposal does not result in material harm to the character or appearance of the area and represents an acceptable form of development in this location adjacent to existing development. There would be no harm to the aims of policy C SP1.

CONCLUSIONS

PRINCIPLE

The site is outside of the built up area as defined in the Local Plan and as such the development plan in the determination of this application will consist of the Arun District Local Plan (ALP) 2011 - 2031 and the Climping Neighbourhood Plan.

The key policy considerations are SD SP1, SD SP2 and C SP1 of the Arun Local Plan (ALP) 2011 -

2031. Policy C SP1 states that 'Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty.'

The site is outside the built up area boundary (BUAB) as specified by policy SD SP2 which seeks to focus development in the built up area. Due to the sites location outside the BUAB development would be in conflict with locational requirements of policy C SP1 of the Arun Local Plan 2011 - 2031.

The NPPF generally seeks to promote effective use of land (para 117) and gives weight to proposals that develop under-utilised land (para 118(d)). Whilst outside of the defined BUAB, contrary to Policy C SP1, there needs to be a demonstrable harm to the aims of this policy. The aims of this policy are to preserve the character and beauty of the countryside and to manage the urban/rural fringe. The site is surrounded by residential development on three sides and a road on the other. It is not a site that would be described as countryside and is well related to the developed area of Climping.

Recent decisions on adjoining sites have confirmed that development in this location would be sustainable development for the purposes of 11(d) in the NPPF.

Policy C SP1 would not benefit from full weight of being up to date and the presumption in favour would apply to the application. Even though the proposal only provides one dwelling, it is material to consider the supply at a time when the Council is unable to demonstrate an adequate supply of housing land.

MATERIAL CONSIDERATIONS

Weight should be afforded to the contribution of this housing to local supply as a positive benefit of the scheme given the development would make efficient use of land without significant or demonstrable harm arising. In addition to the presumption in favour of sustainable housing development, the NPPF accepts that development, even residential development, can occur outside settlement policy boundaries when having regard to paragraphs 78 and 79 of the NPPF. Paragraph 78 provides for development in countryside locations where the site is not located in an 'isolated location' in order to promote sustainable development.

For these reasons, it is considered there are other material considerations that weigh in favour of granting planning permission, contrary to the principles of the development plan.

DESIGN & CHARACTER

D SP1 (Design), D DM1 (Aspects of Form and Design Quality) Local Plan 2011-2031 and CPN11 (Quality of Design) and CPN7 (Protection of Open Views) of the Neighbourhood Plan. Policies D SP1 and D DM1 seek to ensure that development:

- Reflects or improves the character of the site and the surrounding area.
- Minimises the impact on neighbouring land/residents.
- The scheme is easily accessible on foot or by public transport.
- The design is adaptable and appropriate in design and scale.

Policy CPN11 of the Climping Neighbourhood Plan seeks to ensure that development is in keeping with its location to protect and enhance the character of the locality. Good design is considered to mean 'responding to and integrating with the local built environment and landscape context as described in the Climping Character Assessment'.

The Arun District Council Design SPD includes detailed guidance on Building Design (Section J) including form and character, scale and massing, building frontages and roofs, and includes guidance on Ensuring Quality (Section L) including materials, details and high quality development. This includes that new buildings should have a form and character that reflect their setting and reflect the scale of buildings

in the area, the need to use attractive detailing and high quality materials and that traditional materials will be actively encouraged to reflect the local vernacular of the area, the utilisation of simple roof forms with one of the prevailing roof form in the district being double pitched gable ended, and that high quality design should be maintained throughout the process from planning to delivery. Section P.01 (Infill Development) states: "Infill development is more common within rural contexts, where the surrounding landscape setting must inform the location, character and boundary treatments of any proposed development."

The scale and massing of the property sits comfortably adjacent to Mistletoe Farm when viewed from Horsemere Green Lane. The dwelling is parallel to Mistletoe Farm and respects the building line set by this property. To further conform with the character of the area, the property will have space around the building and retain ample distances between Mistletoe Farm and 1 Wooldridge Walk to ensure that a cramped appearance in the street scene does not arise.

It is considered the proposal would be in accordance with policy D DM1 (1) and D SP1 of the ALP 2011 - 2031, policy CPN11 of the CNP and paragraphs 12 and 127 of the National Planning Policy Framework.

RESIDENTIAL AMENITY

Arun Local Plan Policy D DM1 (3) indicates that development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. The Arun District Council Design SPD includes detailed guidance on the protection of residential amenity, including setting out the required distances between properties to accord with the 45 and 25 degree tests for daylight, sunlight and overlooking (Section G.03), required separation distance between habitable rooms to ensure privacy (Section H.04), measures to maintain privacy (Section J.02) and minimisation of impacts of noise and overshadowing (Section J.06).

In this instance, the closest residential properties will be Mistletoe Farm to the west and 1 Wooldridge Walk to the south. The ground floor accommodation would have fenestration viewing into the curtilage of the site only; therefore these views would be contained by boundary treatments and would provide natural surveillance for security. At first floor level, there will be rooflights facing north and dormer windows facing south. These would have views towards 1 Wooldridge Walk however these views, with an intervening distance of 13.5m to the boundary, would look towards the garage and rather than any private amenity area. There would be no significant adverse harm to amenity.

Views from the dormers would extend at an oblique angle towards the southern dwelling granted permission under CM/37/18/OUT. This would look towards the driveway rather than private amenity space. Given the height and orientation of the plot, there would be no harmful impacts upon daylight or sunlight.

TRANSPORT

Policy T SP1 of the Arun Local Plan 2011 - 2031 discusses transport issues including safe highway access. Policy CPN 14 of the CNP requires that new development which will have a detrimental impact on highway safety and the living conditions of residents will be resisted.

Regard should be had to paragraph 109 of the National Planning Policy Framework which states that: "Development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts of development are severe".

The development is a traffic generating use however the creation of a single property in this location would not generate significant numbers of vehicular movements to the area ensuring no new interruption to the free flow of traffic on the highway.

The dwelling would require a new direct access from the public highway which is designed to ensure that space is available for the manoeuvring of vehicles serving the property and would have appropriate visibility onto the public highway to ensure that highway safety would not be compromised.

The proposals incorporate a long driveway with a turning head capable of accommodating two parked vehicles. They include a garage but internal dimensions are not in accordance with the Parking Standard guidance. A three bed dwelling would require two off street car parking spaces and the proposal accords with this guidance. Within the site, the dwelling would be provided with cycle storage.

Subject to conditions to secure car/cycle and Electric Vehicle Charging Point provision, the proposals have an acceptable impact on highways and parking and accord with policies T SP1 and T DM1 of the Arun Local Plan, the Arun Parking SPD and the NPPF.

ECOLOGY

Policy ENV DM5 of the Arun Local Plan related to development and biodiversity. It states development should seek to achieve a net gain in biodiversity and protect existing habitats on site.

The site comprises maintained residential gardens and no trees are to be removed as part of the proposals. The Council's Ecologist requested that protected species surveys be carried out and mitigation proposed. Bearing in mind the use of the site, it is reasonable to attach a condition to any permission requiring proportionate ecological surveys and proposals for Biodiversity Net Gain.

SPACE STANDARDS

Policy D DM2 of the Arun Local Plan states 'The planning authority will require internal spaces to be an appropriate size.... Nationally Described Space Standards will provide guidance'. The new dwelling would be two storey and have 3 bedrooms. The dwelling has a GIA of approximately 200sqm so exceeds national standards and provides good size accommodation for future occupants.

The ADC Design SPD (H.04) sets out external space standards and states that 'Amenity spaces should be of an appropriate size and shape to be usable and enjoyable. Private rear gardens should have a minimum depth of 10.5m...'. The depth of the rear garden is 13.5m and the garden size is approximately 148 sqm.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

CIL DETAILS

This application is CIL Liable therefore developer contributions towards infrastructure will be required (dependent on any exemptions or relief that may apply)

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

Sheet 1 of 3

Sheet 2 of 3

Sheet 3 of 3

Access Plan 11253/101 (Rev. P2)

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy D DM1 of the Arun Local Plan.

- 3 No part of the development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the details shown on the drawing titled "Access Plan" and numbered "11253/101 (Rev. P2)".

Reason: In the interests of road safety.

- 4 No work for the implementation of the development hereby permitted shall be undertaken on the site on Public Holidays or at any other time except between the hours of 8am and 6pm on Mondays to Fridays.

In addition to these hours of working, the Local Planning Authority may approve in writing a schedule of activities where it is necessary to conduct works outside the hours specified in this condition.

Reason: To safeguard the amenities of nearby residents in accordance with policy QE SP1 of the Arun District Local Plan.

- 5 Prior to commencement of development, a Biodiversity Enhancement Site Plan detailing the proposed biodiversity enhancement measures on site shall be submitted and approved in writing by the Local Planning Authority. The approved enhancement measures must be implemented and retained thereafter.

Reason: To ensure the proposals would result in Biodiversity Net Gain, in accordance with the Environment Bill and policy ENV DM5 of the Arun Local Plan.

- 6 No part of the development shall be first occupied until the car parking has been constructed in accordance with the approved site plan. These spaces shall thereafter be retained at all times for their designated purpose.

Reason: To provide car-parking spaces for the occupants and visitors of the new dwelling, in accordance with policies T DM1 of the Arun Local Plan and the Arun Parking SPD.

- 7 No part of the development shall be first occupied until covered and secure cycle parking

spaces have been provided in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority. These spaces shall thereafter be retained at all times for their designated purpose.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies including the National Planning Policy Framework, and policies T SP1 and T DM1 of the Arun Local Plan.

- 8 No part of the development shall be first occupied until the electric vehicle charging space(s) have been provided in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies including the National Planning Policy Framework, and policies T SP1 and T DM1 of the Arun Local Plan.

- 9 No development above damp proof course (DPC) level shall take place unless and until details and a timetable in the form of an Energy Statement (including details of physical works on site, sustainable construction methods, energy conservation and energy efficiency measures and renewable energy sources), have been submitted to and approved in writing by the Local Planning Authority. At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources (as described in the glossary at Annex 2 of the NPPF) unless it can be demonstrated that a fabric-first approach would achieve an equivalent energy saving. The development shall be implemented in accordance with the approved details and timetable and retained as operational thereafter, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to secure on site renewable energy, reduce energy use, and ensure the development is sustainable, in accordance with national planning policy, and in accordance with Policies ECC SP1 and ECC SP2 of the Arun Local Plan.

- 10 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 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.

- 11 Development shall not commence until the applicant has submitted the following reports and plans from an Arboricultural Consultant; to be approved in writing by the Local Planning Authority: Arboricultural Impact Assessment (AIA) which must be inclusive of; a 'Tree Survey Schedule', a 'Root Protection Area (RPA) Schedule' and a 'Tree Constraints Plan' - with the trees accurately plotted on same.

In the event that a RPA of any tree which is proposed for retention overlaps the development

then BS5837:2012 requires that the Detailed Planning Application is accompanied by an Arboricultural Method Statement (AMS) and also most importantly a Tree Protection Plan - to both describe and illustrate the mitigation measures which are to be employed to ensure that the trees survive without detriment to their vigour and vitality and are given adequate protection both above and below ground.

Reasons: To comply with BS5837 and to ensure that retained trees are afforded due respect and appropriate levels of protection such that their ongoing health and vitality is not compromised, and they can continue to enhance the landscape and amenity of the area.

- 12 No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters;

- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding (including tree protection measures),
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),

Reason: In the interests of highway safety and the amenities of the area in accordance with policy TSP1 of the Arun Local Plan.

- 13 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

- 14 INFORMATIVE: 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.