

From: Amanda Scholes on behalf of Planning.Responses
Sent: 11 March 2021 09:27
To: Planning Scanning
Subject: FW: EP/10/21/PL - Engineers Consultation Response

Amanda Scholes

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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 11 March 2021 09:12
To: Anita Gardner <Anita.Gardner@arun.gov.uk>
Cc: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: EP/10/21/PL - Engineers Consultation Response

Dear Anita,

I offer my apologies for the delay in responding to your consultation request.

Engineers Comments Regarding Surface Water Drainage

The hierarchy for sustainable drainage must be followed with infiltration fully investigated. A 5m easement from buildings to soakaways must be provided (including buildings off site), in addition we stipulate that soakaways are kept 2.5m from property boundaries and 5m from the highway.

Surface water drainage must be considered at the earliest opportunity and form part of the layout development process. The applicant has provided no surface water drainage design. No winter groundwater monitoring or percolation testing results have been provided. 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.

In this case, it is clear from the dimensions shown on the site layout that it will not be possible to locate a soakaway within the boundary of the western unit, it is also unlikely that a soakaway could be provided in the eastern unit without a relaxation of our requirements relating to the proximity to the south boundary.

It is also worth noting that the site slopes from south to north, depending on the depth to groundwater this could make draining surface water to the south more challenging.

Not utilising infiltration due to lack of space is inappropriate, this proposal unduly prejudices drainage design and is likely to not allow for the hierarchy for sustainable drainage to be followed. *There are no ordinary watercourses within or adjacent to the site, if infiltration is unviable due to inadequate space the water would have to go to foul sewer, it is unlikely this would be acceptable to Southern Water and therefore there would be a significant risk that the application would not be implementable.*

Therefore I object to the application.

In order to remove my objection the applicant will need to supply winter groundwater monitoring, infiltration testing and a drainage design that shows that it is possible to meet our requirements and drain surface water from the site without increasing flood risk elsewhere. If the applicant proposes a shared soakaway or alternative shared infiltration system then they must show who will be responsible for the maintenance and management of that system in a maintenance and management manual (to be agreed via condition).

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

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 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 event plus 40% on stored volumes, as an allowance for climate change. 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

<https://www.arun.gov.uk/surfacewater> 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.”

Due to the risk of shared infiltration features:

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.

Kind Regards

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Current working pattern: Monday 8am-2.30pm, Tuesday 8am-5.30pm, Wednesday 8am-5pm, Thursday 8am-5.30pm, Friday 8am-11.30am.

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