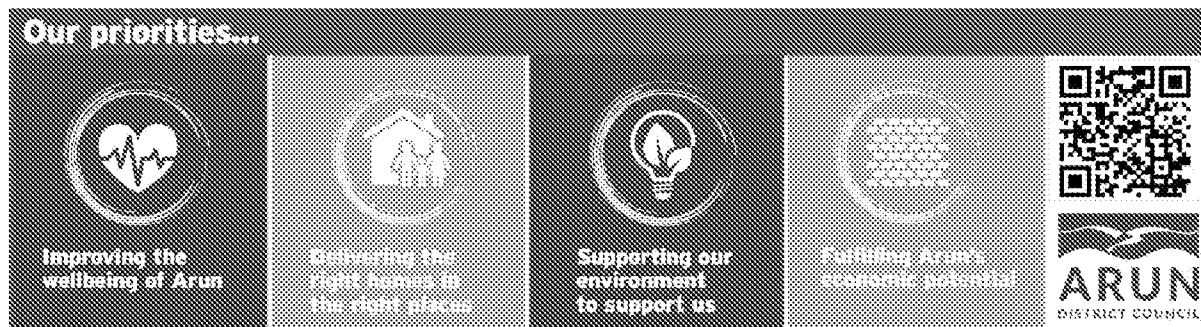


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**From:** Paul Cann <Paul.Cann@arun.gov.uk>

**Sent:** 27 April 2023 10:35

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

**Cc:** David Easton <David.Easton@arun.gov.uk>; Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>

**Subject:** RE: Planning Consultation on: FP/274/21/OUT

Please find enclosed our external consultants response in respect to surface water drainage/land drainage.

**It is important to note that this consultation may need to be revised depending on the outcome of the proposed checking of the hydraulic modelling undertaken to verify flood plain extents.**

Regards

**Paul Cann**

**Principal Drainage Engineer**, Coastal Engineers and Flood Prevention

**T:** 01903 737819

**E:** [paul.cann@arun.gov.uk](mailto:paul.cann@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd

Littlehampton, West Sussex, BN17 5LF

[www.arun.gov.uk](http://www.arun.gov.uk)



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**From:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Sent:** 13 December 2022 17:19

**To:** Paul Cann <[Paul.Cann@arun.gov.uk](mailto:Paul.Cann@arun.gov.uk)>

**Subject:** FW: Planning Consultation on: FP/274/21/OUT

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** Tuesday, December 13, 2022 5:18:40 PM (UTC+00:00) Monrovia, Reykjavik

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Consultation on: FP/274/21/OUT

**To:** **Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

### TOWN AND COUNTRY PLANNING ACT 1990

**Application No:** FP/274/21/OUT

**Registered:** 11th February 2022

**Site Address:** Bognor Regis Golf Club Downview Road Felpham PO22 8JD

**Grid Reference:** 495157 100813

**Category:** Plan App with EIA

**Description of Works:** Outline planning application with all matters reserved, except means of access, for the erection of up to 480 new homes (C3), the formation of a new means of

access onto Golf Links Road, together with the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure and the retention and re-purposing of the retained club house (F2). This site also lies within the parish of Yapton, affects a Public Right of Way and is a Departure from the Development Plan. This application is subject to an Environmental Statement.

I am able to inform you that I have received an amendment to the above application dated 5th December 2022 relating to:- Additional Site A drainage technical note and sequential and exception test addendum.

[Click here to view the plans and documents](#)

If you should wish to make further representations as a result of this amendment you should click the link below and then click on 'Enter comment'.

[Click here to make further comments](#)

Please make any further comment by **7th January 2023**.

**Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.**

Yours sincerely

Mr D Easton

Planning Case Officer- Arun District Council

Telephone: 01903 737500 ex37361

Email: [david.easton@arun.gov.uk](mailto:david.easton@arun.gov.uk)

PLRECON (OOB) 2016

Date: 25/04/2023

**Bognor Regis Golf Club Downview Road Felpham PO22 8JD**  
**Planning Reference: FP/274/21/OUT**

**At this stage we would recommend removing our holding objection based on the additional information provided by the applicant in the Technical Note – Site A – Response to Drainage Officers comments dated 1<sup>st</sup> November 2022.**

The additional information provided in this technical note has addressed our concerns raised in relation to the provision of sufficient surface water attenuation to support the outline development proposals as well as demonstrating through the additional consultation with the Environment Agency that the surface water attenuation measures should not be comprised by the fluvial flooding events.

We welcome the provision within the applicants' proposals to ensure the current attenuation basins provide additional volume of storage, thus demonstrating a "worst case" scenario.

The technical note provided by the applicant provides clear and concise outline of the proposals and thus we can recommend removing our holding objection to this application.

We would still like to ensure that further provisions in terms of investigating the potential for infiltration drainage, even through the use of shallow infiltration SuDS such as permeable paving across the site. When the Reserved Matters application is submitted, we will expect to see that this has been fully investigated and the opportunities for the use of permeable paving with direct infiltration and other source control SuDS measures, thus reducing the amount of run-off from the site should be incorporated, as this will all assist in reduce the extent of flooding downstream. As such we have proposed these requirements in the planning conditions

If you are minded to approve the application, please apply the following conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

PCENG1

1. 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 guidance provided by the 'SuDS Manual' produced by CIRIA. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council, and are an overriding factor in terms of requirements. 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.

INFORMD

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 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-riskassessments-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%).*

*Freeboard is to be provided between the base of the infiltration structure and the highest recorded groundwater level identified in that location. Ideally this should be 1 metre where possible, as stated in the CIRIA Suds Manual guidance. However, on the coastal plain in particular, where geology dictates and where shallow perched/tidally influenced water tables are often present, this is unlikely to be achievable. Irrespective of this, infiltration must still be fully considered. Therefore, to maximise this potential and avoid utilising other less favourable methods of surface water disposal, the bases of infiltration structures are permitted to be immediately above the peak recorded groundwater levels where it is deemed necessary.*

*In areas where an aquifer is to be protected (subject to guidance from the Environment Agency) then a minimum 1 metre freeboard must be provided.*

*Suitable water treatment is required upstream to the point of discharge in all circumstances to minimise any groundwater pollution risk or detriment to the drainage network*

*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 extent 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. Reference should also be made to the 'West Sussex LLFA Policy for the Management of Surface Water'.*

PCENG3

2. The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is

permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

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. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing

#### INFORMD2

INFORMATIVE: Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), or its agent (Arun District Council land.drainage@arun.gov.uk), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens. The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse.

#### PCENGD4

3. 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

#### INFORMD3

INFORMATIVE: If during construction works, it becomes apparent that implementation cannot be carried in accordance with previously agreed details any resubmission of the drainage design must be accompanied by an updated copy of the management manual.

#### ENGD1

4. Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the local planning authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose. The scheme shall thereafter be maintained 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.

#### INFORMD4

INFORMATIVE: A surface water drainage verification condition guidance note is available at <https://www.arun.gov.uk/drainage-planning-consultations>, this clearly sets out our requirements for discharging this condition