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From: Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Sent: 01 June 2021 15:02
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Raymond Cole <Raymond.Cole@arun.gov.uk>
Subject: RE: Planning Consultation on: F/6/21/WS

Dear Ray,

We apologise for the late response to this application and hope that our comments can be passed onto WSCC.

Engineers Comments Regarding Surface Water Drainage

We note that an outline drainage strategy has been submitted with this application. We have the following comments:

- The suitability for use of infiltration must be supported by on site testing. Groundwater levels are not so high as to preclude its use here. The development is not within a source protection zone.
- Discharge should be restricted to greenfield QBar where possible.
- Surface water must be contained safely within the site for all events up to and including the 1 in 100 year plus 40% cc event. As per NPPF and WSCC policy for the management of surface water paragraph 5.3.2.
- Ordinary watercourse land drainage consent will be required for proposals to discharge to ordinary watercourse. If the existing outlet is to be used then supporting evidence must be supplied to show that this is in an appropriate condition to receive this water.
- Pumping of surface water must be avoided where possible (WSCC policy for the management of surface water policy 3). Pumping is not sustainable and is prone to failure.

- Further details on proposed treatment of surface water should be provided to evidence that downstream water bodies will not be negatively impacted by proposals.
- Detailed network calculations, layout drawings and construction detail drawings will be required at detailed design.

If it is possible to do so, we would like to request that the following conditions are applied to ensure that the development is adequately drained and does not increase flood risk elsewhere.

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.”

PCENG D3

“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. No construction is permitted, which will restrict current and future land owners 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.

And the accompanying informative:

INFORMD2

“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.”

PCENG4

“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.

ENG1

“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.

If it is not possible to request conditions then we would have to object to the application as we do not believe surface water drainage proposals as currently presented meet policy requirements.

Kind regards,

Laura Gibbons

Drainage Engineer

Engineering Services

Please note that I work Tuesdays 08:00-16:00 for Arun only.



T: 01903 221374

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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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

Sent: 20 April 2021 10:49

To: Land Drainage [REDACTED]

Subject: Planning Consultation on: F/6/21/WS

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	F/6/21/WS
Registered:	15th April 2021
Site Address:	Ford Circular Technology Park Ford Road Ford BN18 0XL
Grid Reference:	499479 103331
Category:	West Sussex Cons
Description of Works:	Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial waste, including ancillary buildings, structures, parking, hardstanding and landscape works.

The Council has been consulted on the above application which is being determined by West Sussex County Council. In this case, Arun District Council is acting as a statutory consultee and can only resolve to ?object? or ?not object? or make a comment as the responsibility for making a formal determination rests with the county council.

The documents can be viewed at:

[Click here to view documents available on our website](#)

[Click here to access West Sussex County Council web site and use search boxes to find the application.](#)

Should you have any comments to make, these should be sent by replying electronically to planning.responses@arun.gov.uk by **4th May 2021**.

Please be aware that any comments you may make will be available to view on our website so please do not insert personal details or signatures on your reply.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Raymond Cole

Planning Case Officer - Arun District Council

Telephone: 01903 737598

Email: raymond.cole@arun.gov.uk

PLCONREGS (ODE) 2020