

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

To register to receive notification of planning applications in your area please go to www.arun.gov.uk/planning and click on Local Planning Application Finder

Sign up to our newsletter [here](#)



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

Sent: 03 June 2021 16:39

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

Subject: RE: Planning Consultation on: LU/116/21/PL

Comments on proposed surface water drainage scheme

The hierarchy for sustainable drainage must be followed with infiltration fully investigated.

The applicant is proposing to discharge surface water at a restricted rate to the public combined sewer which is not considered sustainable. At present, it has not been conclusively proven that infiltration is not viable on this site, as only one infiltration test appears to have been carried out to date. This was carried out within the sandy material underlying the site but was noted not to be winter testing or in full compliance with BRE365. however, one test location is not considered sufficient for a site of this size where better areas of infiltration may exist and must be explored. This can only be proven by further onsite investigation. Generally, rates of $\times 10^{-7}$ or worse are considered unviable for infiltration. Some winter groundwater monitoring has been carried out which revealed variable ground water levels across the site (peaking between 4.3m and 5.8m below ground level) and also provides opportunities for a range of potential test depths.

Therefore, the applicant will ultimately need to undertake further infiltration testing (testing in winter months required for any design) and in strict accordance with BRE365, above peak recorded groundwater levels. The depth and precise timing of this testing will need to be agreed. The sandy material (and even the chalk if/where above peak recorded ground water levels) beneath the site will certainly require further investigation to determine any potential opportunities of infiltration, beyond what has been done already. Due to a principal aquifer existing below

the site, the Environment Agency will need to be involved in these discussions and also in any final infiltration design, to ensure adequate protection of the aquifer from contamination. It is anticipated that this can be achieved

Dissolution features may exist in the chalk strata and this will also be an important consideration in any design.

The applicant should note that the existing basin on the western boundary of the site, constructed as part of the Fitzalan Road link road scheme to serve a section of the highway drainage system, would appear to rely on infiltration. This potentially indicates the viability of infiltration in this area.

Open suds features are encouraged to enhance biodiversity/water treatment, etc and there appears to be no evidence that this has been considered. It should also be noted that open suds features cannot be considered part of the public open space provision. Permeable paving will need to form part of any proposal to help provide a means of water treatment.

It is essential to establish if there is adequate space for an acceptable surface water drainage scheme prior to agreement of the site layout. Drainage should be a fundamental consideration in design. Failure to secure a robustly evidenced implementable drainage strategy at this stage will likely unduly prejudice the drainage design and result in proposals failing to meet policy requirements.

As a result of the above, I object to the application.

However, 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. Please also ensure that the 'Drainage Strategy & Water Quality Management Report Dated March 2021' is not listed as an approved document in any decision notice. Please also note that it is unclear at this stage as to whether condition **PCENG2** can be met based upon the current development layout and the uncertainty over the form in which the surface water drainage scheme will ultimately take.

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 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."

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.

Regards

Paul Cann
Principal Drainage Engineer
Engineering Services

T: 01903 737819

E: paul.cann@arun.gov.uk

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



Sign up to our newsletter [here](#)



From: Land Drainage <Land.Drainage@arun.gov.uk>
Sent: 20 April 2021 15:12
To: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: FW: Planning Consultation on: LU/116/21/PL

From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: Tuesday, April 20, 2021 2:11:38 PM (UTC+00:00) Monrovia, Reykjavik
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/116/21/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: LU/116/21/PL
Registered: 20th April 2021
Site Address: Land South Of The Littlehampton Academy Fitzalan Road Littlehampton BN17 6ED
Grid Reference: 503354 102629
Description of Works: Erection of 112 No. residential units with access from Fitzalan Road, open space, hard and soft landscaping works, internal roads/footways, car and cycle parking, substation, bin store and associated engineering and infrastructure works. This site is in CIL Zone 4 & 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 21st May 2021 . You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning.

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 the the leaflet how to respond to planning applications <https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

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://www.planningportal.co.uk/info/200207/appeals> 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

Mrs A Gardner

Planning Officer- Arun District Council

Telephone: 01903 737529

Email: Anita.Gardner@arun.gov.uk

PLCONSULT (ODS) 2020