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Please upload onto Ocella the email trail below from **ADC Drainage Engineers** confirming the wording of the refusals for **Conditions 10 and 12 of LU/184/21/DOC** and **Condition 1 of LU/188/21/DOC**.

Thanks,

Michael

From: Roger Spencer <Roger.Spencer@arun.gov.uk>
Sent: 29 October 2021 08:49
To: Michael Eastham <Michael.Eastham@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Subject: RE: Hampton Park

Michael,

I think all three are OK

Comments on 10 of 184 – whilst we are yet to be sure about the on-site flood risk, you are right to mention the off-site risk, which is where the meeting with others will be important in relation to the CW App.

Comments on 12 of 184 – I know it isn't in the Condition but as the Central Wetlands is IDD (IDB), they will have to get an Activity Permit from the EA for relevant discharges, rather than Land Drainage Consent from us, although I

am sure that Paul will have further observations about the application when it gets here – there may be parts that fall outside of the IDB that will require LD consent.

Regards,

Roger Spencer
Engineering Services Manager, Place

T: 01903 737812

E: roger.spencer@arun.gov.uk

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From: Michael Eastham <Michael.Eastham@arun.gov.uk>
Sent: 28 October 2021 19:36
To: Roger Spencer <Roger.Spencer@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Subject: RE: Hampton Park

Dear Roger,

Further to your email below, could we refuse **Condition 10 of LU/184/21/DOC** on the following grounds?:

“The information submitted regarding Condition 10 imposed on outline planning permission LU/47/11: relating to a fully detailed surface water drainage scheme at Phase 2B (also referred to as Phase 4) Hampton Park is refused and the condition is not discharged.

Further details on the surface water drainage scheme design are required to evidence that flood risk on site is safely managed and the development will not result in increased flood risk off-site. Currently proposals are insufficient to demonstrate compliance with paragraphs 167, 169 of the National Planning Policy Framework (2021), WSCC policy for the management of surface water policies 1-6, and Policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan”.

Could we refuse **Condition 12 of LU/184/21/DOC** on the following grounds:

“The information submitted regarding Condition 11 imposed on outline planning permission LU/47/11: relating to formal consent in writing from the Local Planning Authority for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourses at Phase 2B (also referred to as Phase 4) Hampton Park is refused and the condition is not discharged.

Currently proposals are insufficient to demonstrate compliance with Policy W DM3 of the Arun Local Plan, Arun byelaws, and Section 23 of the Land Drainage Act”.

Could we refuse **Condition 1 of LU/188/21/DOC** on the following grounds:

“The information submitted regarding Condition 1 imposed on planning permission LU/346/14/PL: relating to arrangements for future access to and maintenance of any watercourses or culvert (piped watercourse) crossing or abutting the site at Phase 2B (also referred to as Phase 4) Hampton Park is refused and the condition is not discharged.

Currently proposals are insufficient to demonstrate compliance with Policy W DM3 of the Arun Local Plan, Arun byelaws, and Section 23 of the Land Drainage Act”.

Regards,

Michael

From: Roger Spencer <Roger.Spencer@arun.gov.uk>
Sent: 28 October 2021 18:26
To: Michael Eastham <Michael.Eastham@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>
Subject: Hampton Park

Dear Michael,

I have managed to find some time to compare the contents of the outline documents with that within the non-tech summary and I find anomalies. Unfortunately other, more urgent, COVID related matters came up today, so my views here are not exhaustive!

At outline, there is mention of 7 l/s/ha runoff rate (as well as seeking some betterment to this) whereas the NTS says 15.

We would nowadays look for 1:100 + 40% climate change. The Outline uses 20% but the NTS speaks of 30%

The outline does not mention using an engineered main swale – there is mention of providing swales that direct water to the wetlands. The Masterplan shows a main spine within the central wetlands but does not describe that this will be much more than a receiving mechanism for the other swales, to get water to the Black Ditch; it shows a rather meandering line, that would seem not to be needing much work on it. There is speak (at outline) of filling some ponds and ensuring other ponds that are used for attenuation, are outside of the flood zone, so as not to compromise flood storage. I accept that the ‘engineered’ main swale will help but the proposals are not well detailed; especially in terms of the relationship to Black Ditch. There is mention of Black Ditch water levels being at 1m AOD (ie the base/invert of the main engineered swale) but I cannot see mention of flood level likelihoods in Black Ditch or any sensitivity around this.

As an observation, the Outline mentions less attenuation for the parts of the system that are close to the wetlands , as they (the wetlands) are perceived as being able to accept greater flow rates but overall the attenuation would be to the agreed runoff rate. This will need careful consideration if this concept has been taken through to the DoCs.

The NTS is the information (or at least a good step towards it) that we requested back in the summer, so that we could try to align our thinking with the proposals; however, what we now have seems to be a departure from the concept put forward in the Outline. As such, I don’t think that the central wetlands have been examined in sufficient detail, and what information we have should not yet be used as justification for the approval of the DoCs for the adjacent phases. The Central Wetlands application is said to be being submitted next week, so we are yet to see whether the Application accords with the NTS in every detail (some details that are yet to be provided!).

A plan in part 2 of the NTS has annotation to say that the swale is to tie in to the existing ditch– the existing ditch have no supporting data and there is no relationship on that plan shown to the Black Ditch (ie what accommodation works might be required off-site)

Obviously, the EA will want to examine the Central Wetlands proposals, not for the (residential) drainage point of view but from the IDB and Main River perspective.

I have not looked at the detail of the Central Wetlands proposals (in the NTS) but I know that colleague have concerns, not least about the lack of gradient to the main ‘engineered’ swale. Siltation could well be an issue – either from the development or carried onto the swale from the Black Ditch. There should also be an allowance for good practice in terms of ecological benefit.

Regards,

Roger Spencer
Engineering Services Manager, Place

T: 01903 737812

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