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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 07 September 2021 15:15

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

Cc: Simon Davis <Simon.Davis@arun.gov.uk>; Anita Gardner <Anita.Gardner@arun.gov.uk>

Subject: RE: Planning Consultation on: M/109/21/PL

Engineers Comments Regarding Surface Water Drainage

The application is within the Lidsey Treatment Catchment, and partly within both Flood Zone 2 and Flood Zone 3, therefore surface water drainage design should be carefully considered. Infiltration must be fully investigated.

The applicant has supplied an FRA which rules out infiltration on the basis of desk based study (para 4.38), we will not accept this as a justification for not utilising infiltration where possible. Winter groundwater monitoring (which captures the action of the tide) and winter infiltration testing will be required to determine if infiltration is viable.

It is likely that the existing surface water from the site drains to the foul sewer. We will strongly oppose any proposal to connect surface water from the proposed development to the foul sewer, particularly in this location (Lidsey). If infiltration is proven to not be viable on the site then we suggest the applicant approaches us to discuss the viability of discharging to the sea or to WSCC highway drains on Elmer Road.

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.

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:

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 event plus 40% on stored volumes (allowance for climate change) 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 storm event plus 40% on stored volumes. 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 [Drainage Planning Consultations | Arun District Council](#) 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."

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services

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

Sent: 03 August 2021 09:04

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: M/109/21/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: M/109/21/PL
Registered: 2nd August 2021
Site Address: 188 Elmer Road Middleton-On-Sea PO22 6JA
Grid Reference: 498595 100029
Description of Works: Erection of replacement dwelling. This site is in CIL Zone 4 and is CIL Liable as new dwelling.

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 3rd September 2021 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

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 information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

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://acp.planninginspectorate.gov.uk/> 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