ARUN DISTRICT COUNCIL M/12/24/DOC

[redacted]

From: Kathryn Welch
Sent: 30 April 2024 15:39
To: Planning Scanning
Subject: FW: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis M/12/24/DOC

[redacted]

Thanks,

Kathryn Welch
Senior Planning Officer, Planning Department

[redacted]

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



ARUN DISTRICT COUNCIL M/12/24/DOC

From: Caplin, Clive [redacted]
Sent: Thursday, April 4, 2024 5:09 PM
To: Sarah Burrow <[redacted] Louisa Wade [redacted]
Cc: Sam Caplin [redacted]>; Kevin Macknay [redacted]; Paul Cann [redacted]; Lee Moses [redacted] Kathryn Welch <[redacted] Andrew Howick [redacted] Neil Crowther [redacted]
Subject: RE: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

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Hi Sarah,

Further to your e-mail below, we are somewhat at a loss as of what to do next and therefore ask for some clarification/agreements.

Firstly, earlier correspondence from Lee Moses (WSCC Highways officer) states that WSCC will not accept an overflow into the Highway drainage system adjacent to the site (as per his response below). Therefore, in accordance with his advice of "being so close to the beach an alternative solution could be found", we proposed an alternative solution which this application was based upon. This was based on site-specific infiltration tests ruling out infiltration, hence an overflow from the rainwater harvesting system onto the beach foreshore within our ownership boundary was proposed. Extra work and costs were incurred to design the drainage strategy for submission, based on the final emails from Lee Moses and yourself. Your latest e-mail now suggests that the conclusions of Lee's email may not be the case and that Lee Moses will defer the decision to Kevin Macknay, subject to us "providing evidence of the existing drainage arrangements on this site". This means re-visiting the drainage strategy, further investigations and further costs with no guarantee that this will overcome the objection issues.

We feel it is unacceptable for you to expect us to keep submitting application after application based upon "If's and "may reconsiders" (highlighted in red below). Therefore we request that this application is put on hold or extended (subject to the Planning Dept agreeing) and a Stakeholders meeting held on site to determine exactly what would be acceptable. Then adjust this application to align with that agreement. Otherwise we feel you are giving us no choice but to go to appeal for non-determination of the application and reversal of decisions.

We are also somewhat concerned by your suggestion of "We have suggested that options for betterment are explored and discussions should be had as to whether there is the option for a financial contribution to secure betterment to the existing drainage system".

Our application is already a 'betterment' due to the installation of a RWH system which is a widely accepted SuDS solution and a vast improvement to the existing 1930's home which currently drains completely into the WSSC's highway drainage system, via rainwater downpipes discharging directly onto the front driveway. You must also appreciate that we should not and cannot be held responsible for a "financial contribution" to improve WSCC systems further. This is a single replacement dwelling application not an application for multiple dwellings.

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Also, further to your comment "We are also unwilling to accept a gravity solution that would penetrate the sea wall as this would compromise the standard of defence that the asset provides". As previously brought to your attention and as stated within our application, the rear garden wall is NOT an Environmental Agency Asset and therefore should not be considered as such. However, we are willing to agree on a solution that has no need to go through or over this wall. We must point out that a pumped solution going over the wall has already been approved at 8 Manor Way (6 houses to the east of this plot), but again we know you advised us that you were not responsible for that application being approved (as per your email attached); it does however, still demonstrate that a precedent has already been set for a pumped over the wall solution.

Given that the outfall from the WSCC highway drain goes into a soakaway onto the beach very close by, and our proposed drainage strategy will also have an overflow onto the beach, this is considered to be very sustainable as ultimately the WSCC soakaway and our proposed drainage system would both be discharging to the beach. Our proposed drainage system therefore would not be directing more runoff into the WSCC drain, so would have no impact on the capacity of the WSCC highways infrastructure (and in fact, be improving the situation by removing water from the WSCC system).

Finally, please be assured that the progress for our application is frustrating, as the advice we have received has been somewhat confusing, contradictive and certainly not constructive. What would be really helpful is to find out exactly what you are willing to accept and sign off on rather than what you are unwilling to accept, then we can draw this matter to a close.

Yours Sincerely.

Clive & Samantha Caplin
188 Elmer Road
Elmer
West Sussex
PO22 6JA

From: Sarah Burrow [redacted]
Sent: Wednesday, April 3, 2024 4:13 PM
To: Louisa Wade [redacted]
Cc: Caplin, Clive [redacted]; Sam Caplin [redacted]; Kevin Macknay [redacted]; Paul Cann [redacted]; Lee Moses [redacted]
Subject: [External] RE: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

Hi Louisa,

I wanted to contact you directly in advance of my consultation response on application M/12/24/DOC. I have now discussed the application at length with the principal drainage engineer (Paul Cann) and the flooding and coastal engineering manager (Karl McLaughlin). Following our discussion Paul has spoken directly with Kevin Macknay,

ARUN DISTRICT COUNCIL M/12/24/DOC

the drainage and flooding lead professional for WSCC (highways, transport and planning), I understand that Lee Moses would defer to Kevin on this matter – but I am happy to stand corrected. All parties are copied in.

Following these discussions, it would appear that if adequate evidence of the existing drainage system is provided, WSCC may reconsider their previous stance of refusing formal connection of surface water from this site to the highway drainage system that discharges to the beach adjacent to 188 Elmer Road.

It is agreed within this department that a pumped overflow of surface water will not be accepted. Pumping is unsustainable and when pumps fail, flood risk is increased.

We are also unwilling to accept a gravity solution that would penetrate the sea wall as this would compromise the standard of defence that the asset provides.

Given how limited the options for your client are, and that the existing site drains informally to the highway drainage system, we are of the opinion that this option needs to be further explored. Kevin has asked that you provide further evidence of the existing drainage arrangements on the site. We have suggested that options for betterment are explored and discussion should be had as to whether there is the option for a financial contribution to secure betterment to the existing drainage system.

My consultation will be recommending that the application is refused – this is due to the time involved in further exploring the design solution. I appreciate that progress to date has been slow and that this must be frustrating. However, I hope you appreciate that we are demonstrating that we are attempting to support you and your client in achieving a more sustainable and acceptable design solution by engaging with WSCC on your behalf and outside of the planning process.

Prior to making a new application, please can you provide evidence of the existing drainage arrangements on the site. This should include photographs of the downpipes – apparently these discharge on to the driveway which falls to the road? We need a clear understanding of where all downpipes discharge to, the overland flow paths and the existing impermeable area. This must be presented to Kevin who can then reconsider the proposal. It is likely that any agreed overflow will have to be at a restricted rate.

Please let me know if you have any questions.

Kind regards

Sarah Burrow
Engineering Assistant, Coastal Engineers and Flood Prevention

[redacted]

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Monday – Flexible between 8am and 4pm
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From: Louisa Wade [redacted]
Sent: Friday, February 2, 2024 10:04 AM
To: Sarah Burrow [redacted]; Lee Moses [redacted]
Cc: Caplin, Clive [redacted] Sam Caplin [redacted]
Subject: RE: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

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Hi Sarah,

We will be going back to the original plan of having the rainwater harvesting system to the rear of the property and the overflow over the rear wall and onto the beach. I will prepare a drawing and formal response to submit to discharge the planning condition.

ARUN DISTRICT COUNCIL M/12/24/DOC

Kind regards

Louisa Wade BSc (Hons), MSc, MCIWEM C.WEM
Principal Flood Risk Consultant, Water and Maritime

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From: Sarah Burrow [redacted]
Sent: Thursday, February 1, 2024 5:15 PM
To: Lee Moses [redacted]; Louisa Wade [redacted]
Cc: Caplin, Clive [redacted] Sam Caplin [redacted]
Subject: RE: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

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Hi Louisa,

This is an unfortunate update. Please can you let me know your intended strategy and I will try and work out if there are any further challenges or ways I can assist.

Kind regards

Sarah Burrow
Engineering Assistant, Coastal Engineers and Flood Prevention

[redacted]

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From: Lee Moses [redacted]
Sent: Tuesday, January 30, 2024 4:35 PM
To: Louisa Wad[redacted]
Cc: Caplin, Clive[redacted]; Sam Caplin [redacted]; Andrew Howick [redacted]; Sarah Burrow [redacted]
Subject: RE: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

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Hi Louise,

ARUN DISTRICT COUNCIL M/12/24/DOC

Thank you for providing a drawing, I have spoken to our drainage team and they will not accept an overflow connection into the WSCC system. They have suggested that being so close to the beach an alternative solution could be found.

Kind regards

Lee Moses MIHE
Senior Engineer, Highway Agreements,
Planned Delivery.
West Sussex County Council.

CALL IM EMAIL
Location: Ground Floor Northleigh, County Hall, Chichester, West Sussex, PO19 1RH
[redacted]

From: Louisa Wade [redacted]
Sent: Tuesday, January 30, 2024 12:27 PM
To: Lee Moses [redacted]
Cc: Caplin, Clive [redacted]; Sam Caplin [redacted] Andrew Howick [redacted]
Subject: Proposed Overflow to Highways Drain: 188 Elmer Road, Bognor Regis

****EXTERNAL****

Hi Lee,

Thank you for your email. I have attached a mark up plan to this email (on the left hand side). This shows the proposed rainwater harvesting tank in front of the house with an overflow to the manhole labelled MH6 on the plan. I also attach a photo of MH6. Please note, the majority of the runoff from the proposed development will be captured in the rainwater harvesting tank and re-used, so the only water discharging to the highways drain will be in extreme events when the rainwater harvesting tank capacity is exceeded and water discharges via the overflow. This is considered to be a betterment compared to the existing situation in which all of the runoff from the site makes its way into the highways drain via the road gullies. There will be a gravity outfall from the RWH overflow to the manhole as we understand that the invert level of the manhole is over 2m below ground level.

Please can you confirm whether it would be acceptable to have the overflow from the RWH tank to the existing highways manhole MH6?

ARUN DISTRICT COUNCIL M/12/24/DOC

Do you hold any details of the highways drain in this footpath and the manholes? If so please could you provide these to me so that I can update our drainage drawing accordingly.

Please let me know if you have any questions. If you wish to discuss this with Clive and Sam Caplin, they have informed me that they would be happy to meet you on site.

Kind regards

Louisa Wade BSc (Hons), MSc, MCIWEM C.WEM
Principal Flood Risk Consultant, Water and Maritime

[redacted]
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From: Lee Moses [redacted]
Sent: Tuesday, January 30, 2024 11:24 AM
To: Sarah Burrow [redacted]; Louisa Wade [redacted]
Cc: Kathryn Welch [redacted]; Paul Cann [redacted] Karl Mclaughlin [redacted]; Caplin, Clive [redacted]; Sam Caplin [redacted] Andrew Howick [redacted]
Subject: RE: Infiltration Test Results GE22252: 188 Elmer Road, Bognor Regis

You don't often get email from lee.moses@westsussex.gov.uk. Learn why this is important

Hi Louisa,

Please can you send me over a plan and I can take a look?

Sarah – Thanks for sending.

ARUN DISTRICT COUNCIL M/12/24/DOC

Kind regards

Lee Moses MIHE
Senior Engineer, Highway Agreements,
Planned Delivery.
West Sussex County Council.

CALL IM EMAIL
Location: Ground Floor Northleigh, County Hall, Chichester, West Sussex, PO19 1RH
[redacted]

From: Sarah Burrow[redacted]
Sent: Tuesday, January 30, 2024 10:19 AM
To: Louisa Wade[redacted]
Cc: Kathryn Welch [redacted]; Paul Cann [redacted]; Karl Mclaughlin [redacted]; Caplin, Clive [redacted] Sam Caplin [redacted]; Lee Moses [redacted] Andrew Howick [redacted]
Subject: RE: Infiltration Test Results GE22252: 188 Elmer Road, Bognor Regis

****EXTERNAL****

Hi Louisa,

We accept that infiltration is not viable on this site.

Please investigate whether it will be possible to connect to the existing WSCC highway drainage system in the adjacent footpath. I have copied in two officers from WSCC who may be able to assist you in this regard – Lee Moses and Andy Howick. As there is an existing WSCC soakaway on the foreshore adjacent to your clients property it makes sense to use the existing infrastructure if there is spare capacity. Connection to an infiltration system accords with the sustainable drainage hierarchy.

We are reluctant to approve a strategy which could lead to multiple and piecemeal discharges (if others do the same) of surface water on to the beach when an alternative sustainable option is potentially available.

Kind regards

Sarah Burrow
Engineering Assistant, Coastal Engineers and Flood Prevention

[redacted]

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From: Louisa Wade [redacted]
Sent: Monday, January 29, 2024 11:11 AM
To: Sarah Burrow [redacted]

ARUN DISTRICT COUNCIL M/12/24/DOC

Cc: Kathryn Welch [redacted] Paul Cann [redacted]; Karl Mclaughlin [redacted] Caplin, Clive [redacted] Sam Caplin [redacted]
Subject: Infiltration Test Results GE22252: 188 Elmer Road, Bognor Regis

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Dear Sarah,

Following on from our previous correspondence, we have had infiltration tests carried out in the rear garden of Seafever, 188 Elmer Road. The tests were carried out on the 15th January, which was the highest spring tide, at depths of 1.35m bgl and 0.55m bgl. The results are detailed in the attached report.

To summarise:

- Groundwater was not recorded within the trial pits. However, the groundwater monitoring well was monitored and recorded groundwater levels between 1.76m and 1.77m bgl over a 3 hour period.
- The engineer attempted to carry out tests to BRE365 standard. However, the underlying soils became saturated within 100 minutes in the deeper test pit (HP01) and only a fall in head of 0.01m occurred within 247 minutes in the shallower test pit (HP02), so it was not possible to carry out three fills, or extrapolate an infiltration rate from the results.
- Given the above, it would not be possible to achieve a half drain time of less than 24 hours in a soakaway or other infiltration device.
- Therefore, infiltration within the site boundary is not considered a viable means of managing the overflow from the proposed rainwater harvesting system.

Please could you review the attached and confirm that you accept the conclusions I have set out above? Please respond as soon as possible as our Client is keen to submit their condition discharge. If I have not heard back from you within a week, I will assume that the above is acceptable and we will proceed with the work required to discharge the planning condition.

Kind regards

Louisa Wade BSc (Hons), MSc, MCIWEM C.WEM
Principal Flood Risk Consultant, Water and Maritime

[redacted]

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