

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: 01 July 2021 17:21

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

Cc: Andrew Wood <Andrew.Wood@arun.gov.uk>

Subject: RE: Planning Consultation on: R/113/21/PL

Engineers Comments Regarding Surface Water Drainage

The proposed development would render almost the entire site impermeable. At present the central section of the site appears to be permeable grass (see google image below). No information regarding surface water drainage (regarding the existing or proposed) has been submitted with this application, no reference has been made to drainage in the cover letter or DAS.



I wish to lodge a **holding objection** to this application. The hierarchy for sustainable drainage must be followed, therefore infiltration must be prioritised above discharging to a watercourse or a sewer. However, is it unclear if there is enough space on the site to support infiltration features (5m from buildings and highway, 2.5m from property boundaries). Having insufficient space is an unacceptable excuse for not following the hierarchy, particularly as there is no surface water sewer in the vicinity of the site and we oppose all connections of surface water to the foul sewer.

To overcome my objection the applicant should complete winter groundwater monitoring and winter infiltration testing and complete calculations to assess the size of structures required. A rough plan should be formed showing where these structures can be provided within the proposed layout. If the applicant has evidence that infiltration will not be viable on the site this should be supplied and a basic attenuation design with an appropriate outfall location should be supplied.

However, if you are minded to approve the application please ensure the following conditions are applied:

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 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 [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."

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

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: 26 May 2021 08:49

To: Land Drainage [REDACTED]

Subject: Planning Consultation on: R/113/21/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: R/113/21/PL
Registered: 25th May 2021
Site Address: 66 The Street Rustington BN16 3NR
Grid Reference: 505048 102338
Description of Works: Construction of a single-storey upwards extension to provide an additional 4 No. residential units. This application affects the setting of a listed building & affects the & character & appearance of the Rustington Conservation Area & is in CIL Zone 4 (Zero Rated) as flats.

The Council have received the above application.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 24th June 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

Andrew Wood

Planning Officer- Arun District Council

Telephone: 01903 737768

Email: andrew.wood@arun.gov.uk

PLCONSULT (CDS) 2020