

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 30 July 2021 09:30

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

Cc: Neil Crowther <Neil.Crowther@arun.gov.uk>; Anita Gardner <Anita.Gardner@arun.gov.uk>

Subject: RE: Planning Consultation on: WA/32/21/PL

Dear Neil,

I understand that an administrative error meant that we were not consulted on this application when it was submitted. Despite this, I had hoped that I would have been able to provide you with a consultation response in advance of your report and decision, this was not possible due to alternative commitments and the complexity of the drainage arrangements on site which meant I needed to collaborate with my colleagues for the response.

I can confirm that if we had been able to provide a consultation in advance of your report then we would have **objected** to the application due to lack of information and apparent failure to comply with the adopted West Sussex County Council [WSCC] LLFA Policy for the Management of Surface Water (referred to here on in as LLFA SuDS Policy). It is not possible to determine if flood risk would be increased on site, or elsewhere on the basis of the information supplied. I have the following more detailed comments and would appreciate it if you could pass these on to the applicant, I hope these may be useful should they consider making another application.

Engineers Comments Regarding Surface Water Drainage

Groundwater Monitoring

This has been undertaken between November 2019 and March 2020, groundwater was at ground level at the south of the site and 0.94m below ground level [bgl] near the north-east boundary (WS2) and 0.97m bgl in the centre of the site (WS6). Therefore infiltration can be ruled out as a means of surface water disposal at the south and west of the site, however shallow infiltration may still be viable at the north-east and centre of the site.

Infiltration Testing

Infiltration testing undertaken in February 2021 indicates that infiltration will likely be viable in the north-east (SA2 in vicinity of WS2) and centre of the site (SA1 in vicinity of WS6). The slowest rates for each pit were 2.48×10^{-4} m/s (SA1) and 1.35×10^{-5} m/s (SA2), these tests were done slightly below peak groundwater level (60mm), however these would be acceptable for the use of calculating the required sizing of soakaways in these areas.

However, no testing has been done at levels representative of the formation level of the permeable paving. As the ground conditions are likely to be less permeable at these levels (silty clay) the applicant will need to undertake shallower infiltration tests in winter to ascertain an infiltration rate to be utilised for the design of the permeable paving.

Proposed Strategy

Despite infiltration being viable in the north-east and centre of the site, the applicant is proposing to collect and treat all surface water with permeable paving, attenuate it in culvert storage and SuDS pond and discharge it to the

neighbouring watercourse at a discharge rate of 4.4l/s. This is inappropriate and does not follow the drainage hierarchy (LLFA SuDS Policy 1) or mimic the natural drainage catchments of the site (LLFA SuDS Policy 3).

As infiltration has been found to be viable in parts of the site we expect the surface water drainage strategy to be revised. The new strategy should maximise infiltration where possible and attenuate surface water from the remaining areas before discharging to the watercourse at an agreed rate, this is commonly referred to as a hybrid strategy. No calculations have been provided to justify the previously proposed discharge rate which seems high for a greenfield site. We would expect the rate to be calculated on the basis of the positively drained area only, this will likely decrease the discharge rate.

The watercourses on the west and south-east boundary are classified as Main River. As such, if the applicant intends on discharging water to either of these watercourses they will need to apply for an Activity Permit from the Environment Agency. If they propose (as drawn) to discharge surface water to the ordinary watercourse on the south boundary, they would need Ordinary Watercourse Land Drainage Consent in order to do this, they would also require consent in order to construct the proposed culvert at the site entrance.

At this stage no calculations have been provided to support the sizing of any of the surface water drainage components. Therefore we do not know if more area take up is required for surface water drainage. At this stage it is unclear if it is possible to design a SuDS scheme on this site which is compliant with policy requirements and adequately considers all sources of flood risk.

The Proposed Pond

The Drainage Strategy Statement indicates that the applicant intends to install a pond on the site. This is intended to serve dual purposes, as a surface water storage feature (with variable water levels), and to provide biodiversity benefits on site. The applicant is proposing to *“excavate within the area of the proposed pond to reduce levels to meet the current groundwater level. This will increase the potential storage capacity and communicate directly with the groundwater to establish the pond.”* Peak groundwater level at this location is at ground level (WS4). Therefore minimal excavation will be necessary to provide connectivity to groundwater, and certainly no additional (permanent) storage will be provided by doing so.

The proposed pond is located within Flood Zone 3 in an area at risk of both fluvial (river) and pluvial (surface water) flooding. This currently dry area, provides storage for flood water. If the banks of the pond are raised up, preventing flood water from entering then this will displace flood water and increase offsite flood risk. If they do not raise up the banks then the pond cannot be relied upon for surface water drainage, and there may still be floodwater displaced by standing water levels or the surface water from the site which is connected to it. No calculations or modelling have been provided to prove that flood risk will not be increased on site or elsewhere by the inclusion of this pond in a flood storage area (NPPF para 167, and LLFA SuDS Policy 4).

The proposed pond appears to be primarily proposed to create a net gain for biodiversity on the site (Phase II Results and Mitigation Strategy, 12.4), and indeed the Drainage Strategy Statement states that *“If the preferred option is to keep the site’s drainage system separate from the proposed pond and any biodiversity features, the connection downstream from the flood zone can be used without intrusion by providing a connection directly from the proposed culvert.”* Drainage design should maximise the opportunity for amenity and biodiversity benefits (LLFA SuDS Policy 8), therefore to disconnect the surface water drainage from the biodiversity pond on the basis of it’s inappropriate location within a flood zone would appear to be in contravention of that policy.

Removal of the pond would reduce biodiversity benefits therefore relocation of the pond may be the best option to ensure those benefits are still gained and that flood risk is not increased as a result of the proposed development. However, it is unclear where else on this site the pond could be located without moving proposed homes into an area of flood risk (which is clearly inappropriate). This is the primary reason for my objection. In order to overcome this objection further detail of the revised drainage strategy would need to be supplied, including data and plans to show that flood risk would not be increased on site or elsewhere with the inclusion of the pond. Compensatory storage for both fluvial and pluvial flood volumes may need to be provided. It is suggested that the applicants engineers contact us to discuss our requirements on this in more detail.

Access

The proposed access is over an existing watercourse (see above re culverting this watercourse). This is an area at high risk of surface water flooding. If ground levels are raised to enable safe access and egress then compensatory storage should be evidenced for the pluvial flood volume that would have been stored here and the drainage strategy should indicate how the water will be displaced. If ground levels are not raised then access and egress from the site may be compromised by surface water flooding.

Further Comments

There appear to be trees in very close proximity to attenuation features. Please ensure all existing and proposed trees are shown on drainage layouts. Attenuation features must not be located within the tree root (present and future) zones. The surface water drainage design should be considered in conjunction with arboricultural. Not considering the two together can lead to complications, delays and unnecessary compromises as a result of an inappropriate layout.

The applicant should anticipate that **if** they are able to overcome our objection we will likely request standard conditions PCENG2, PCENG3, PCENG4 and ENG1 to be applied if you were minded to approve the application.

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



Current working pattern: Monday 8am-2:30pm, Tuesday 8am-5:30pm, Wednesday 8am-5pm, Thursday 8am-5:30pm, Friday 8am-11:30am.

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

Sign up to our newsletter [here](#)



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

Sent: 21 July 2021 09:49

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

Subject: Planning Consultation on: WA/32/21/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: WA/32/21/PL

Registered: 26th April 2021

Site Address: Land at West Walberton Lane Walberton BN18 0QF

Grid Reference: 496458 106184

Description of Works: Construction of 30 No. dwellings together with associated access, parking, public open space & landscaping. This site may affect the setting of listed buildings, affects the character & appearance of the Walberton Green Conservation Area, is a Departure from the Development Plan & is in CIL Zone 3 & 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 27th 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

Mr N Crowther

Planning Officer- Arun District Council

Telephone: 01903737500 Ex 37839

Email: neil.crowther@arun.gov.uk

PLCONSULT (COB) 2020