

[REDACTED]

From: Simon Davis
Sent: 15 July 2021 18:56

Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Susan Leeson [REDACTED]
Subject: RE: WA/58/21/PL Brookview Nursery

Dear Dan,

Thanks for your email. I agree that the policy is not particularly clear. It just states

Major development within this area must also be accompanied by a full Drainage Impact Assessment which must take account of surface water disposal and foul water disposal. Although minor developments are unlikely to raise significant flood risk due to the cumulative impact all development within this area must also be accompanied by a Drainage Impact Assessment that must take account of both the individual and cumulative impact upon foul water disposal; flood storage capacity and surface water drainage or flood flows within the Lidsey Wastewater Treatment Works Catchment Area.

(my emphasis underlined)

However, we had the same question raised on BN/50/20/PL and I obtained the following advice at the time from Policy and Engineers:

On the subject of the Drainage Impact Assessment, Policy have said that what the DIA needs to show, as detailed in the policy, is how the drainage from the site (both surface and foul) can be safely disposed of/dealt with - combined or separate routes; with further discussion in terms of the impact this then results in, both individually and cumulatively, on flood storage capacity and flows resulting from the treatment works during times of flood.

Engineers say that it should cover the resultant (and cumulative) flow from package foul treatment plants as well as the 'normal' surface water flows. Package plants are to be avoided and Members are not in favour but sometimes they are the answer and sometimes they provide the ability of developers to get building and occupying before Southern Water has made any necessary upgrades to their network. The discharge of treated flows (into watercourses) should be picked up as part of consenting (outside Planning) but it would be good to see that everything would work before getting too far down the line.

We consult Southern Water on the DIA. You can view the one that was submitted for BN/50/20/PL using our website.

If you are satisfied that this is all covered by the existing report then fine but otherwise you may need to provide a supplemental report.

I hope this helps.

Simon J Davis MRTPI
Principal Planning Officer
Directorate of Place

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From: Dan Lytton [REDACTED]
Sent: 15 July 2021 15:48
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: WA/58/21/PL Brookview Nursery

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Hi Simon,

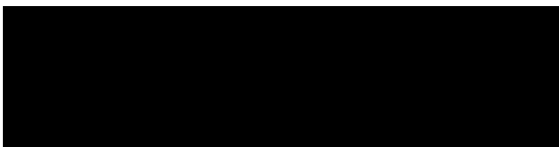
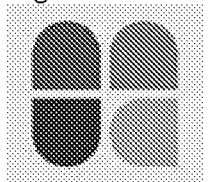
Hope all is well, and you don't mind me contacting you directly. I have had a look at the document you advise, however I am curious as to what is expected with regard to the 'Drainage Impact Assessment' for the Lidsey Catchment other than what is already provided within the FRA & Drainage Strategy Report, that confirms:

- Surface water runoff will be discharged to the watercourse at a controlled rate of 2.0l/s, with appropriate treatment, representing an 80% betterment compared to the average peak annual runoff of the existing Brownfield site up to the design event.
- Foul discharge to the public foul sewer will be 0.45l/s, based on Water UK Design & Construction Guidance (4000l/day) for 9 No. units. OFWAT Charging Rules place the onus on the sewerage undertaker to reinforce their network should there no longer be sufficient capacity to serve the new development.

However, I understand that there may be capacity issues with Southern Water's foul network capacity for this area, so please could you advise on what you would like to see for this site? Although there is a boundary watercourse here which could support a private foul treatment plant this doesn't seem appropriate to me given the Foul Drainage Hierarchy and the risk of flooding within the watercourse corridor.

Kind Regards,

Dan Lytton MEng
Engineer



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From: Simon Davis <Simon.Davis@arun.gov.uk>

Sent: 15 July 2021 14:17

To: Susan Leeson [REDACTED]

Subject: WA/58/21/PL Brookview Nursery

Dear Sue,

Hope you are well.

I have just been reallocated this case from Anita. I have done the initial application checks and have a few requests for you:

The site lies within the 12km buffer of the Singleton & Cocking Tunnels Special Area of Conservation. Policy advice is contained in SD10 of the South Downs National Park Local Plan and VE10 (2020) of the soon to be made Walberton NP 2. Advice from SDNPA is that we should be doing appropriate assessments to determine whether likely adverse will occur on barbastelle and Bechstein's bat flight lines. It would be helpful to me if you can provide a Shadow Habitat Regulations Assessment to assist me with this task.

I note that there is no evidence of any wildlife surveys. I appreciate that is an existing developed site but it's in the countryside and I consider that as a minimum a phase 1 habitat survey should be provided to assess potential for wildlife habitat (with any follow-up surveys, should the ecologist recommend any). Notwithstanding, we have consulted our ecologist. Please also note that ALP policy ENV DM5 requires details of biodiversity net gain for new developments so this will need to be provided.

Lastly, ALP policy W DM1 states that major development within the Lidsey Treatment Catchment Area must be accompanied by a full Drainage Impact Assessment which must take account of surface water disposal and foul water disposal.

Can you advise whether you will be able to provide information to assess the above?

Kind Regards

Simon J Davis MRTPI
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