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From: Simon Davis <Simon.Davis@arun.gov.uk>
Sent: 11 August 2021 11:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Planning Consultation on: WA/58/21/PL

Further Drainage Engineers Consultation Advice

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 11 August 2021 11:15
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/58/21/PL

Hi Simon,

Yes, I acknowledge there is an existing surface water flooding issue on Eastergate Lane north of Brookview and Ashogle. However, as this is a brownfield site which is largely impermeable at present I do not agree that you are likely to increase flood risk with the proposed development. The current surface water drainage arrangements are likely to discharge surface water at an unrestricted rate to the watercourse at the east and south and if the application is approved and conditioned as requested then we would seek to restrict and reduce discharge rates from the site significantly. Indeed if infiltration is viable (this is acknowledged to be unlikely) then all surface water may be discharged to ground rather than the watercourse.

Paul's e-mail in the FRA appendices seems to be corrupted (font is illegible) on the public portal, however I asked him for a copy of his comments and he highlighted the following to the applicant:

- Please confirm if you are aware of any historic flooding in close vicinity and/or on the public highway. Historic flooding of highway at the point marked with a star on the enclosed plan. Main reason for flooding is run off from the land to the north. Some landowners have undertaken works to minimise this but there still may be an issue. See also Ashogle below.
- Please confirm details of existing or planned flood alleviation and defences in this area. None known at present, although if the highway flooding mentioned below still exists, then WSCC Highways may need to consider works.
- Please confirm if any drainage studies and/or SWMP have/are being assess for this area. Lidsey SWMP looked at this area. I believe the flooding here was one of the wet spots. See WSCC website.

It is certainly worth considering the access arrangements for future users of the site given the historic and likely future flooding near the entrance. We could seek to include mitigation measures to reduce this risk (drains at the entrance which can feed into the watercourse), but again this can all be dealt with at DOC stage and would not warrant an objection as there is a suitable discharge location. Indeed arguably this *should* be remedied by WSCC as it is the highway that is flooding and the highway drains which are not adequately draining the area, however, given that we cannot guarantee that these works would be undertaken I would suggest the site implements their own mitigation as suggested.

I hope this all makes sense, let me know if you need any further clarification of our position.

Kind regards

Sarah Burrow

Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



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

Sent: 11 August 2021 10:55

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

Subject: RE: Planning Consultation on: WA/58/21/PL

Hi Sarah,

Thanks. We have quite a few objections coming in about surface water flooding on Eastergate Lane at the site entrance. The Parish response has a photo of a large extent of flooding here.

I assume your comment *there is potential for the surface water drainage on site to be improved, discharge rates (compared to existing) reduced and flood risk decreased off site* would cover this concern

Simon.

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 11 August 2021 10:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/58/21/PL

Engineers Comments Regarding Surface Water Drainage

The applicant has submitted an FRA and Drainage Strategy to support the application. This is a desk based study and the authors acknowledge the need for site investigations to determine groundwater levels and infiltration rates.

On the basis of an assumption that infiltration will not be viable on the site (due to the expected clay soils and knowledge of the existing surface water drainage system) the applicant is proposing to collect surface water from the roads (via permeable paving) and roofs in two ponds (at the west and south of the site) before discharging it at a restricted rate to the watercourse which runs along the east and west boundaries. **IF** infiltration is found to not be viable following appropriate site investigations then we would support this strategy.

The applicant's engineers are encouraged to contact us and agree the level of winter groundwater monitoring and infiltration testing that is required for the site. If the proposed strategy is taken to detailed design stage then we would expect to see the discharge rates restricted to the greenfield 1 in 1 year runoff rate during all events up to and including the 1 in 100 year rainfall event with climate change. An alternative approach would be for discharge rates to be limited to a range of greenfield rates, based on the 1 in 1, 1 in 30 and 1 in 100 year storm events. **The current combined proposed discharge rates of 2l/s and 5l/s are likely to exceed this requirement.**

All buildings, structures and fences are to be kept a minimum of 3m from the watercourse to ensure access for maintenance.

However, we acknowledge that if you are minded to approve the proposed development, there is potential for the surface water drainage on site to be improved, discharge rates (compared to existing) reduced and flood risk decreased off site.

Therefore we have no objection and ask that 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 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."

PCENG3

"The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site. "

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. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing.

And the accompanying informative:

INFORMD2

"Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), or its agent (Arun District Council land.drainage@arun.gov.uk), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens.

The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse."

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 arrangements for the surface water disposal scheme are agreed before construction commences.

Kind regards

Sarah Burrow

Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



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