

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

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



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

Sent: 10 November 2022 10:36

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

Cc: Juan Baeza <Juan.Baeza@arun.gov.uk>; Karl McLaughlin <Karl.McLaughlin@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

Subject: RE: Notification of an appeal WA/80/21/OUT

Importance: High

Dear Juan,

It has come to my attention that engineering services did not provide a consultation for this application prior to the refusal being issued. This was due to an administrative error on my part. I am sorry for any inconvenience this causes or has caused you or the applicant.

As surface water drainage comments from ourselves were not received prior to determination I appreciate that they will not influence the outcome of the appeal. However, I would appreciate it if you could request that the conditions listed at the end of this email be added to the approval should the inspector be minded to uphold the appeal.

I have briefly assessed the FRA and Drainage Strategy that supported this application and would like to highlight that no winter groundwater monitoring or winter infiltration testing has been undertaken on this site to date (that we are aware of). Please can you ask the applicant to contact this department via email at land.drainage@arun.gov.uk to discuss and agree the level of site investigation that is necessary for this site should the appeal be upheld or if they intend on making an updated outline application. As the site investigations must be carried out in winter this is an urgent request to avoid potential delays to the development at later stages of the application process.

I thank you in advance for passing on this consultation and for including the stipulated conditions in your recommendations to the inspector.

Suggested surface water conditions, to ensure that the development is adequately drained and does not increase flood risk elsewhere, as follows:

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 guidance provided by the 'SuDS Manual' produced by CIRIA. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council, and are an overriding factor in terms of requirements. 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 infiltration tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method. All design storms must include a climate change allowance, as per <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>, on stored volumes or rainfall intensity. Infiltration structures must cater for the critical 1 in 10 year storm event, (plus 40%) between the invert of the entry pipe to the soakaway and the base of the structure. All surface water drainage designs must also have provision to ensure there is capacity in the system to contain the critical 1 in 100 year storm event (plus 45%).

Freeboard is to be provided between the base of the infiltration structure and the highest recorded groundwater level identified in that location. Ideally this should be 1 metre where possible, as stated in the CIRIA Suds Manual guidance. However, on the coastal plain in particular, where geology dictates and where shallow perched/tidally influenced water tables are often present, this is unlikely to be achievable. Irrespective of this, infiltration must still be fully considered. Therefore, to maximise this potential and avoid utilising other less favourable methods of surface water disposal, the bases of infiltration structures are permitted to be immediately above the peak recorded groundwater levels where it is deemed necessary.

In areas where an aquifer is to be protected (subject to guidance from the Environment Agency) then a minimum 1 metre freeboard must be provided.

Suitable water treatment is required upstream to the point of discharge in all circumstances to minimise any groundwater pollution risk or detriment to the drainage network.

Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest groundwater table in support of the design. The applicant is advised to discuss the extend of ground water monitoring with the council's engineers.

Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application. Reference should also be made to the 'West Sussex LLFA Policy for the Management of Surface Water'."

PCENG D3

"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:

INFORM D2

"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."

PCENG D4

"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.

ENG01

“Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the local planning authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose. The scheme shall thereafter be maintained 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.

And the accompanying informative:

INFORM04

A surface water drainage verification condition guidance note is available at <https://www.arun.gov.uk/drainage-planning-consultations>, this clearly sets out our requirements for discharging this condition.

Kind regards

Sarah Burrow
Engineering Assistant, Coastal Engineers and Flood Prevention

T: 01903 737815

E: sarah.burrow@arun.gov.uk

Usual working pattern: 8am – 2:30pm Monday to Friday

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



Our priorities...

Improving the wellbeing of Arun

Delivering the right homes in the right places

Supporting our environment to support us

Fulfilling Arun's economic potential

ARUN
DISTRICT COUNCIL

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

Sent: 13 October 2022 09:19

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

Subject: Notification of an appeal WA/80/21/OUT