

From: Laura Gibbons
Sent: 21 June 2018 16:08
To: Planning.Responses
Subject: RE: Planning Consultation on: Y/13/18/PL

Engineers Comments Regarding Surface Water Drainage

We do not agree that Condition 12 should be removed.

The proposed development is within the Lidsey catchment. Where historic problems of groundwater and sewer flooding are prevalent as a result of the sewerage treatment works nearing capacity and significant groundwater intrusion to the sewerage network. Therefore the careful design of surface water drainage schemes is required to ensure no detriment is caused to neighbouring properties or to the development itself (in line with GEN 7 iv, GEN 9, NPPF on flood risk). Specifically GEN7 iv states that **"does not have an unacceptable adverse impact on adjoining occupiers, land, uses or property and, where relevant, facilitates the development of adjoining sites"** without Condition 12 there is no way to ensure that the site will suitably drain in the future and not cause an increase in flood risk to neighbouring properties.

The proposed development is in an area of high groundwater levels, therefore more site specific and specialist guidance and design is needed than that given in BRE Digest 365.

To imply that a surface water scheme will not require ongoing maintenance is incorrect, maintenance is vital for the continuing operation of SuDS, without it the efficacy of the system decreases and ultimately flood risk increases.

BRE 365 states that **"long-term maintenance and inspection must be considered during the design and construction process"**. Ciria C753 has numerous sections dedicated to the maintenance requirements of different types of SuDS systems, each SuDS feature has its own requirements in terms of maintenance. Maintenance should be considered during design, thus the requirement for a pre-commencement condition. Furthermore, the lack of consideration of future maintenance in design would be in direct contradiction to the Construction Design and Management Regulations 2015.

Prior to commencement we require the following to be submitted and approved by us; detailed design of the surface water drainage scheme (in accordance with our supplementary guidance notes – see enclosed), details of how the system will be maintained, who will complete this maintenance, and how this maintenance will be funded. This ensures the design takes account of the maintenance requirements, and that maintenance requirements are understood and planned for.

In summary Condition 12 is necessary, relevant, enforceable, precise and reasonable as justified by GEN7 and GEN 9.

Regards,

Laura Gibbons, MEng, GMICE
Engineer (Drainage & Coastal)

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From: planning.responses@arun.gov.uk [mailto:planning.responses@arun.gov.uk]
Sent: 21 June 2018 10:35
To: Land Drainage
Subject: Planning Consultation on: Y/13/18/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 Y/13/18/PL

NO:

Registered: 2nd March
2018

Site Address: Street Buildings North End Road Yapton BN18 0DT

Grid Reference: 497610 103878

Description of Works: Variation of condition 3-approved plans & removal of conditions 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26 & 27 following the grant of Y/49/17/OUT.

The Council have received the above application. I shall be pleased to receive any observations you may wish to make.

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

Should you have any comments to make, these should be sent by replying to this email by 12-APR-18.

You can also monitor the progress of this application through the Council web site:
www.arun.gov.uk/planning

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.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

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 as can the leaflet which deals with material planning considerations.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website:

www.planningportal.gov.uk/planning/appeals/ but they will protect personal details.

The officer dealing with this application is Michael Eastham who can be contacted on

telephone number 01903 737772.

Regards
Planning Officer

consultee_email
