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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 25 February 2021 16:32

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

Cc: Maria Tomalova <Maria.Tomalova@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

Subject: RE: Planning Consultation on: Y/151/20/PL

Engineers Comments Regarding Surface Water Drainage

The applicant has submitted a SuDS and Surface Water Drainage Assessment as part of this application. They have undertaken two infiltration tests in November 2020 which have shown infiltration not to be viable at 1.5mbgl and 1.3mbgl. Groundwater is noted to rise to between 1.35mbgl and 1.2mbgl. The results are not surprising as testing was carried out too deep and shallow infiltration potential needs to be investigated. We expect infiltration testing to be completed in the winter when ground conditions are at their worst ie. January/February/possibly early March, and above peak winter groundwater levels (trial hole to be carried out at an agreed time ie. immediately, to determine potential groundwater levels). In addition, the infiltration test depths will need to correspond with the formation depths for the permeable paving (which the applicant is proposing).

The applicant is proposing to capture surface water in water butts for reuse by residents, this is acceptable however the volume should not be included in the attenuation calculations. It is then proposed that the mobile units and access drain via permeable paving which will also provide water treatment and limited infiltration. I would like to see infiltration testing repeated at a depth that corresponds with the formation depth of the permeable paving so that it can be accurately determined whether or not attenuation is required.

The applicant proposes that the permeable paving will convey water to an attenuation system which can direct to the reservoir on site or the watercourse in adjacent Lake Lane. We would be keen to minimise any surface water leaving the site and would encourage any effort to reuse the water for the business. We would also need to understand the present onsite drainage arrangements/water recycling, if this option forms part of the solution.

As no final drainage strategy has been submitted please apply standard condition PCENG2 and PCENG3 if you are minded to approve this application, this will ensure flood risk is not increased elsewhere.

PCENG2

“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 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 event plus 40% on stored volumes, as an allowance for climate change. 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

<https://www.arun.gov.uk/surfacewater> 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. No construction is permitted, which will restrict current and future land owners 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.”

Kind Regards

Sarah Burrow
Engineering Assistant, Engineering Services



Whilst national restrictions are in place I will be working flexibly between the hours of 8am and 8pm. I appreciate your patience if I am slower than usual to respond. Equally I understand that you may be facing similar challenges and varying work patterns and will not be expecting immediate responses to my e-mails.

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

Sent: 08 January 2021 13:49

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

Subject: Planning Consultation on: Y/151/20/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: Y/151/20/PL

Registered: 8th January 2021

Site Address: Pollards Nursery Lake Lane Barnham PO22 0AD
Grid Reference: 496728 104599
Description of Works: Permanent siting of temporary seasonal horticultural worker' accommodation (8 mobile homes & 3 retrospective mobile homes), hardstanding & service building. This site also lies within the parish of Barnham, is in CIL Zone 3 (Zero Rated) as other development.

The Council have received the above application.

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

Should you have any comments to make, these should be sent by replying to this email by 11th February 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 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

Maria Tomalova

Planning Officer- Arun District Council

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Email: maria.tomalova@arun.gov.uk

PLCONSULT (ODS) 2020