

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: 29 June 2021 14:33

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

Cc: Simon Davis <Simon.Davis@arun.gov.uk>; Laura Gibbons <Laura.Gibbons@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>

Subject: RE: Planning Consultation on: Y/57/21/PL

Engineers Comments Regarding Surface Water Drainage

Having provided a consultation response on the same site previously (application ref Y/33/20/PL) I can confirm that the applicant has not satisfactorily addressed the points raised in that objection (dated 22/05/2020) and as such **we object to the proposed development**. We have the following comments, which will include some of the points previously raised:

1. There is a large low area to the north west of the site, this is shown as an area of surface water flooding in a 1 in 30 event and greater on our mapping and is further evidenced in the topographical survey. Flood depths for the 1 in 100 event for a large area are 0.6-0.9m, with one small area reaching a depth of 1.2m. The three detached properties are proposed to be built in this area. The Drainage Strategy Report propose to protect the properties from flooding by raising ground levels at the north and west of the site. The applicant proposes to provide flood storage volume (for the displaced storage) in the centre of the site which will extend into the parking area and rear gardens of the detached properties. Within the basic calculations that are provided they have allowed for a flood depth of 450mm in this area, based upon predicted flood depths it is our opinion this is insufficient.

The applicant argues that surface water from outside the site is not being drained to this low point, we dispute this, the area is a low lying point for the surrounding area (as shown on the LIDAR mapping attached), and as such we expect that surface water from the surrounding area will drain here in high rainfall events. **If the equivalent volume of storage is not provided on site then this will likely increase flood risk elsewhere.** The Drainage Strategy Report does not provide adequate evidence that they have provided enough storage. Furthermore, allowing the parking area and rear gardens to flood to up to 0.45m is not safe or sustainable development.

As per NPPF paragraph 163, it must be evidenced that the development will not increase flood risk elsewhere. Therefore the development must not displace flood water for events up to and including the 1 in 100 year +40% climate change event (compensatory volume is required in addition to the drainage requirements of the new development). Displaced volume should be clearly mapped, along with compensatory volume to show where these volumes will be stored so that the impact can be easily assessed by both ourselves and the Planning Officer. It is impossible to know if storage can be provided below ground as infiltration testing and groundwater monitoring has still not been provided, despite having a full winter in which to complete this in 2020-2021 and having had previous advice to do so (see points 4 and 5).

2. The proposed finished floor levels are too low. These should be set at least 300mm above the flood depth for the 1 in 100 year +40% event. When flood extents and depths for the 1 in 100 year plus 40% cc event are not available it is standard practice to utilise the 1 in 1000 year event. The 1 in 1000 year event, flood elevation appears to be somewhere between 4 to 4.5m AOD, a reasonable assumed level would be 4.25m AOD. Therefore finished floor levels should be 300mm above 4.25m AOD.
3. The NPPF paragraph 158 states that the sequential approach should be used in areas known to be at risk now or in the future from **any** form of flooding. (My emphasis). Therefore we suggest a Flood Risk assessment is undertaken which applies both the sequential test and the exception test to show that this is a suitable location for development.
4. (As per previous consultation): Infiltration testing was completed in October and not in accordance with BRE365. The applicant will need to carry out winter infiltration tests in strict accordance with BRE365, in the locations and at the depths of any proposed infiltration structures. It is expected that this will include both shallow and deeper tests to account for the permeable paving and the proposed soakaways. The testing should be undertaken in the months of January/February when the ground is most saturated and above the recorded highest groundwater level (see point 5).
5. (As per previous consultation): No groundwater monitoring data has been supplied, a full winters groundwater monitoring is required to demonstrate the level at which groundwater peaks on the site. Infiltration testing and by default, all infiltration structures must have their base above this level.

6. It is important that all the documents provided to support the application are consistent. The 3D images which have been submitted do not appear to reflect the level changes which are proposed within the Drainage Strategy Report. These should be altered to show the reality of the proposed development or removed.

Without a significant extension of time we fail to see how the applicant can supply adequate evidence that flood risk will not be increased by development proposals, and that surface water can be adequately drained within the proposed layout. As such **we recommend that the application is refused.**

This consultation has been provided with assistance from Paul Cann, Principle Drainage Engineer and Laura Gibbons, Drainage Engineer.

Kind regards

Sarah Burrow
Engineering Assistant, Engineering Services

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Current working pattern: Monday 8am-2.30pm, Tuesday 8am-5.30pm, Wednesday 8am-5pm, Thursday 8am-5.30pm, Friday 8am-11.30am.

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

Sent: 06 May 2021 08:34

To: Land Drainage [REDACTED]

Subject: Planning Consultation on: Y/57/21/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/57/21/PL

Registered: 6th May 2021

Site Address: Sunnymead North End Road Yapton BN18 0DL
Grid Reference: 498169 104354
Description of Works: Demolition of existing dwelling and outbuildings and erection of 5 dwellings comprising 2 No 4 bed houses, 3 No 3 bed house (resubmission following Y/33/20/PL). This site is in CIL Zone 3 & is CIL Liable as new dwellings.

The Council have received the above application.

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

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

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

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLCONSULT (ODS) 2020

