

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

Sent: 05 July 2021 09:31

To: Dan Lytton

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

Hi Dan,

Thanks for your e-mail, yes I remember discussing this application previously, it is unfortunately one that remains lodged in my memory. You will note from my consultation response that I said it had been provided with the assistance of Paul and Laura, both of whom were in agreement with and contributed to the comments. I have copied them in here so they are aware of the contact made, if you wish to discuss the application further I would insist upon one of them being present as their technical knowledge is superior to my own. If you wish to organise a virtual meeting I will happily attend it, but I suggest you approach Paul or Laura to establish a convenient time as their calendars are busier than mine. My working hours are listed in my e-mail signature and as long as the meeting is within those I will do my best to attend.

However, I must be frank and say I do not see how you will be able to alter the design within this layout and get to a point where our objection can be overcome without winter groundwater monitoring and infiltration testing. I have provided further comments/answers to your points in blue below:

- Flood depths from surface water and the requirement for compensatory storage for overland flows from offsite – as discussed previously the topographic survey demonstrated that there was not an overland flow route from the highway to the site and this was to be maintained via level design. Put simply we do not agree. Paul provided the LIDAR mapping which I attached to the consultation, and Laura was in agreement that the predicted flood depths from surface water flooding would not be generated simply from rain falling on site. It may or may not be coming from the highway but we do not agree that this site does not provide surface water flood storage for the surrounding area and at no time have I agreed with your stance on this.
- Infiltration testing and groundwater monitoring is required to influence detailed design in accordance with ADC requirements and to BRE365 - Whilst we would normally happily deal with this via condition this site is extraordinary in drainage terms and I am surprised/disappointed that the necessary site investigation work was not undertaken over the last winter when your client was aware that surface water drainage was a reason for refusal on the previous application.
- Finished floor levels should be set to ensure no flooding at the site, raised above surrounding levels and low points of SuDS system - This was a point specifically raised by Laura as the 1 in 100 surface water flood depths do not include an allowance for climate change.
- Site appropriateness e.g. Sequential Test. Our assessment of flood risk demonstrates that the site is in Flood Zone 1, and EA response indicates the site outside of the extents of a 1 in 1000 year event, however you have indicated knowledge of flood risk from rivers or sea to the site? As stated within the consultation

response 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. This does not need to be only from rivers or sea. In this case the site is at risk of significant surface water flooding. As such we believe that it is appropriate that a sequential test and exception test are undertaken.

Kind regards

Sarah Burrow

Engineering Assistant, Engineering Services

T: 01903 737815

E: sarah.burrow@arun.gov.uk



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: Dan Lytton

Sent: 02 July 2021 11:24

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

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

Importance: High

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Hi Sarah,

Thank you for the comments with regard to this application. You may recall that we had a previous discussion in May 2020 with regard to the previous application at this site, and my attached consultant response was in summary of this phone conversation.

Broadly we were in agreement to the outstanding issues at this site to be addressed at detailed design, however it would appear that your consideration of certain matters has now changed slightly with this application. If possible, could we arrange another discussion at your convenience to ensure we can amend the design appropriately to achieve a conditional approval for this development?

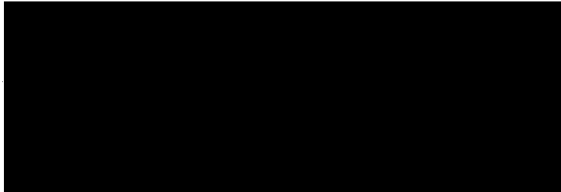
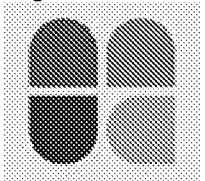
Items to discuss:

- Flood depths from surface water and the requirement for compensatory storage for overland flows from offsite – as discussed previously the topographic survey demonstrated that there was not an overland flow route from the highway to the site and this was to be maintained via level design.
- Infiltration testing and groundwater monitoring is required to influence detailed design in accordance with ADC requirements and to BRE365

- Finished floor levels should be set to ensure no flooding at the site, raised above surrounding levels and low points of SuDS system
- Site appropriateness e.g. Sequential Test. Our assessment of flood risk demonstrates that the site is in Flood Zone 1, and EA response indicates the site outside of the extents of a 1 in 1000 year event, however you have indicated knowledge of flood risk from rivers or sea to the site?

Kind Regards,

Dan Lytton MEng
Engineer



Bright Plan Civils, Transport Planning and Civil Engineering Consultants

Bright Plan Civils, 2 West Barn, Norton Lane, Chichester, PO20 3AF

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Begin forwarded message:

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

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

Date: 29 June 2021 at 14:33:17 BST

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>

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 4.25mAOD. Therefore finished floor levels should be 300mm above 4.25mAOD.
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



T: 01903 737815
E: sarah.burrow@arun.gov.uk

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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 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