

## Engineers Comments Regarding Surface Water Drainage

<b>Application Reference:</b>	AL/107/25/PL	<b>Reviewer Reference:</b>	ADC/EXT5/AF
<b>Planning Officer:</b>	Simon Davis	<b>Date of Review:</b>	8/12/2025
<b>Site Name:</b>	Land at West Barn Old Dairy Lane Norton PO20 3AF		
<b>Application Description:</b>	Demolition of existing tennis court and erection of a commercial building (within Use Class E(g)), parking, landscaping and other associated works. This application is a departure from the Development Plan, may affect the character and appearance of the Norton Lane, Norton Conservation Area and is in CIL Zone 3 (Zero Rated) as other development.		
<b>Assessment Number:</b>	1		

Policy and Guidance Information
<p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/">https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p>

Response	Objection

References
<p>The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to ‘Sustainable drainage systems: non-statutory technical standards’ [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p>

## Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will likely result in an **objection** to an objection to a full or reserved matters planning application.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

Standard	Assessment	Response
1. Runoff destination	Insufficient	<b>Objection</b>
2. Interception drainage	Compliant Subject to Confirmation of Runoff Destination.	<b>More Information</b>
3. Extreme Rainfall and Flooding	Insufficient	<b>Objection</b>
4. Water Quality	Compliant Subject to Confirmation of Runoff Destination.	<b>More Information</b>
5. Amenity	Insufficient	<b>Objection</b>
6. Biodiversity	Insufficient	<b>Objection</b>
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant Subject to Confirmation of Runoff Destination.	<b>More Information</b>

## Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Appendix D - Hydraulic Calcs
- Flood Risk Assessment/Drainage Statement/Foul Drainage Impact Assessment
- Appendix C - Drainage Layout sheet 1 P02
- DRAINAGE MANAGEMENT PLAN P03
- SOAKAWAY CALCULATIONS, uploaded in 3 parts via public planning portal
- BOREHOLE CALCULATIONS
- Block and Location Plan Rev D
- Proposed Site Plan Rev D
- Appendix C - Drainage Layout sheet 2 P03
- HARD AND SOFT GENERAL ARRANGEMENT DRAWING RCO578/02 REV04-
- PROPOSED ELEVATIONS 02 REVB
- HYDRAULIC CALCULATIONS
- PROPOSED EXTERNAL DETAILS SHEET 1 OF 1 LWR/XX/XX/DR/C/7705 REVP02
- PROPOSED EXTERNAL LEVELS PLAN SHEET 2 OF 2 LRW/XX/XX/DR/C/7702 REVP02
- PROPOSED EXTERNAL LEVELS PLAN SHEET 1 OF 2 LRW/XX/XX/DR/C/7701 REVP02

- PROPOSED EXTERNAL LEVELS PLAN SHEET 2 OF 2 LRW/XX/XX/DR/C/7704 REVP02
- PROPOSED EXTERNAL FINISHES SHEET 1 OF 2 LRW/XX/XX/DR/C/7703 REVP02
- EXCEEDENCE ROUTING PLAN SHEET 1 OF 1 LRW/XX/XX/DR/C/7505 REVP01
- PROPOSED DRAINAGE DETAILS SHEET 2 OF 2 LRW/XX/XX/DR/C/7504 REVP01
- PROPOSED DRAIANGE DETAILS SHEET 1 OF 2 LRW/XX/XX/DR/C/7503 REVP01
- SITE PLAN 0825/204/01 in 2 parts via the public planning portal

### Consultation comments to the planning officer

#### 0. General

0.1. We note the WSCC LLFA comments dated 18 November 2025 and the revised drawings and calculations in response.

#### 1. Runoff destination

- 1.1. The drainage strategy is to discharge to ground via a modular crate storage soakaway. Currently no winter groundwater monitoring has been provided. Ground Investigation including the locations of the borehole record and infiltration test, together with soil classification and groundwater monitoring is required to demonstrate the proposed method of disposal can meet design standards.
- 1.2. Advice: It is common for there to be a flow for groundwater within the gravel layers around Chichester including artesian effects during high groundwater events from the pressure head created by the South Downs. It is therefore unlikely that the proposed infiltration solution will be acceptable.
- 1.3. Whilst the existing drainage is reported to discharge to soakaway, evidence is required to confirm the proposed development meets the sustainable drainage requirements of the NSfS which includes a requirement for a 1m unsaturated zone between infiltration and high ground water which may not be possible in this location.
- 1.4. There are also minimum factors of safety required by the NSfS for infiltration which have not been applied and would increase the size of infiltration system required. Justification of the rate applied should be provided.
- 1.5. No alternative method of disposal is proposed should infiltration not be viable and the development is reliant upon the currently drainage strategy which must therefore be demonstrated to be viable at planning stage.
- 1.6. The design is not currently in accordance with the requirements of the NSfS (Standard 1). Therefore, we **object** to the application.

#### 2. Interception drainage

2.1. The current design achieves interception drainage through infiltration to ground. This will need to be reviewed if the runoff destination alters due to the comments above.

#### 3. Extreme rainfall and flooding

- 3.1. An impermeable areas plan should be provided to confirm the drained area and audit the modelling inputs. No urban creep is required.
- 3.2. The current calculations for extreme rainfall will need to be reviewed if the runoff destination alters due to the comments above.

#### 4. Water quality

- 4.1. The mitigation provided by the permeable paving and vortex separator is sufficient to mitigate the risk of pollution from the development.
- 4.2. Please note we will need to re-assess if the design changes.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 5.4. Amenity is not currently in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 6.4. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. An outline Management and Maintenance Plan is provided with the planning application which is acceptable for the current design for planning stage.
- 7.2. Please note this will need to be reviewed if the design changes due to the comments above relating to runoff destination.

8. Suggested conditions / Overcoming the objection

- 8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.
- 8.2. **The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**
- 8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

### Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that

they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- Landscaping officer (proposed trees and landscaping)
- Tree officer (existing trees)
- Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- Portsmouth Water (groundwater source protection zones)
- Lead local flood authority (all other sources of flooding and ordinary watercourses)
- Other: Specify .....
- None

AL/107/25/PL







PL- consultation- drainage response

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

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



**Our priorities...**

 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
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**From:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>  
**Sent:** 08 December 2025 17:10  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Simon Davis <Simon.Davis@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: AL/107/25/PL

Hi Simon,

Find the consultation – an objection – attached. Apologies for the delay in response.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

Kind regards

**Sarah Burrow**  
**Flood Risk and Drainage Engineer**, Coastal Engineers and Flood Prevention







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**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	 
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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 28 October 2025 08:19  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: AL/107/25/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:** AL/107/25/PL  
**Registered:** 27th October 2025  
**Site Address:** Land at West Barn Old Dairy Lane Norton PO20 3AF  
**Grid Reference:** 492782 106456

**Description of Works:** Demolition of existing tennis court and erection of a commercial building (within Use Class E(g)), parking, landscaping and other associated works. This application from the Departure Plan, affects the character and appearance of the Norton Lane, Norton Conservation Area and is in CIL Zone 3 (Zero Rated) as other development.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 27th November 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

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 information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

**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://acp.planninginspectorate.gov.uk/> 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](mailto:Simon.Davis@arun.gov.uk)

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