

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/118/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Amber Willard	Date of Review:	26/02/2026
Site Name:	Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH		
Application Description:	Approval of details reserved by condition imposed under AL/104/25/S73 (APP/C3810/W/25/3358593) relating to condition 4-surface water drainage (see AL/118/25/DOC for discharge of conditions 3-Construction Environmental Management Plan, 7-Biodiversity Enhancement Plan, 10-Natural England licence and statement and 12-lighting).		
Assessment Number:	2		

Policy and Guidance Information	
Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater 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/ Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/ Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds The SuDs Manual [C753] by CIRIA	

Response	Condition 4: Objection
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References
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. The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025. This consultation has been primarily informed by the NSfS and The SuDS Manual.

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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

Standard	Assessment	Response
1. Runoff destination	Compliant	No objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	N/A – Determined at Full Planning Stage	No objection
6. Biodiversity	N/A – Determined at Full Planning Stage	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

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

- Drainage Statement Issue 5 Feb 26
- DRAINAGE STATEMENT PART1 Report and Drawings
- DRAINAGE STATEMENT PART 2 Appendices
- DRAIANGE APPENDICIES
- DRAINAGE STATEMENT

Condition wording

Condition 4 is worded as follows:

"Prior to the commencement of development, full details of the proposed surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. This shall include:

- Winter groundwater monitoring;*
- Winter infiltration testing in accordance with BRE DG 365 or similar;*
- Details of the proposed method and location of surface water disposal in accordance with the SUDS Hierarchy;*
- An impermeable area plan;*
- Calculations modelling for the surface water drainage network for the following storm events: 100% Annual Exceedance Probability (AEP); 10% AEP plus climate change allowance; 3.3% AEP plus climate change allowance, and; 1% AEP plus climate change allowance. All storm events must include an allowance for urban creep and surcharged outfalls where appropriate.*
- Detailed drainage plans;*
- Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms, and;*
- Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SUDS scheme.*

The development shall be carried out only in accordance with the approved plans. The surface water drainage system shall remain for the lifetime of the development.

Reasons: To ensure that the proposed development is satisfactorily drained and in accordance with Arun Local Plan policies W SP1, W DM1, W DM2 and W DM3. This is required to be pre-commencement so details can be approved prior to construction"

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.

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

Application Reference: AL/118/25/DOC Site Name: Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH	Initial Issue Date: 26/02/2026 Issue Date: 04/12/2025 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 4: **Objection**

Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

	ADC Drainage Comments	ADC Drainage Comments	Designer Response	ADC Drainage Comments	
Date:	04/12/2025	26/01/2026	05/02/2026	26/02/2026	

Condition Number: 4

Comment Number					
1.	The planning condition requires winter infiltration testing. None is submitted. Designer Response 09/01/2026 In accordance with Local and National Drainage Policy, a 1m unsaturated ground is required between peak winter groundwater levels and the base of any infiltration feature. As noted below, peak groundwater levels to date are 0.7mbgl, therefore, infiltration drainage is disregarded and proposed drainage discharge is to the boundary	Infiltration drainage is still apparent on the construction details plan for the permeable driveway. This will need to be altered to impermeable liner.	We have now proposed an impermeable lining for the permeable pavement. However, it should be noted this specific matter directly conflicts the comments provide by Sarah Burrow in respect of this planning application in March 2025. We assume Arun's position has therefore changed on this matter in light of the July 2025 National Standards?	Comment resolved.	

	ditches, thus infiltration testing is not required.				
2.	The planning condition requires winter ground water monitoring. None is submitted. It must be evidenced that 1m unsaturated ground is provided between peak groundwater levels and the base of any infiltration feature Designer Response 09/01/2026 Please see attached winter groundwater monitoring, which confirms winter groundwater levels recorded at up to 0.7mbgl to date.	GW monitoring is noted and is within 1m of the surface. No further comment.			
3.	The design does not include provision of Interception Drainage in accordance with the National SuDS Standards Designer Response 09/01/2026 the design does include interception drainage via permeable pavement and rainwater harvesting, consistent with Arun District Council's interception drainage guidance - Arun District Council, and with	The permeable pavement is within 1m of the water table and will need to be lined. Rainwater harvesting would need to be specifically designed for interception drainage. Details are not provided on the drainage layout and construction details. Please provide a design for interception drainage	Rainwater harvesting details have now been provided, noting the change in permeable pavement specification requirements and the change in policy that this is no longer considered interception drainage. GreenBlue Urban SuDS Pod to be utilised. Manufacturer has provided construction details and modelling information to include within hydraulic	The design for interception drainage does not appear to meet the criteria within NSfS. The lined permeable pavement is acceptable for self-drained area. The roof areas can be served by swales, or other vegetated areas and should be supported by calculations in the report to confirm the areas are sufficient.	

	National standards for sustainable drainage systems (SuDS). This was previously submitted so please re-review		modelling. Unit will provide interception drainage at surface and attenuation.		
4.	The planning condition requires an updated impermeable areas plan. None is submitted. This should include a summary and total including urban creep allowance Designer Response 09/01/2026 The impermeable areas plan is shown within drawing 005. This was previously submitted and does include a summary and total including urban creep allowance, so please re-review	The impermeable areas plan indicates a total area of 569sqm whereas the calculations include 330sqm. Please clarify the design.	Please re-check calculations. Note that there are two separate systems and therefore the catchment areas are shown on pages 2 and 8 of the calculation sheets. ($0.005 + 0.028 + 0.004 + 0.008 + 0.006 + 0.007 = 0.058 \text{ Ha.}$)	Comment resolved.	
5.	The proposed design peak outflow rates are arbitrary and not restricted to greenfield runoff rates in accordance with the National SuDS Standards. Design flow restriction should be based upon greenfield runoff equivalent for the drained area and if necessary a relaxation applied where constraints preclude meeting the GFR rate. Modern flow	Peak outflow will not be reduced by rainwater harvesting or infiltration in this case. The NSfS states 'Where the peak allowable discharge rate requires flow controls with orifices (or equivalent) with a diameter of less than 50mm, the flow control shall be robustly protected from blockage risks. Regardless of this, the risk of blockage for all flow controls shall be assessed and mitigated against.' There	Design has been amended to utilise SuDSStore Controflow Universal chambers, which utilise orifice flow controls and a protection filter. The manufacturer states that: "Applications – all SuDS elements, particularly those that do not provide filtration for orifice protection and at the end of the management train" The unit is therefore	The design still does not make an effective case for relaxation of Standard 3 of the NSfS in terms of peak flow restriction to Greenfield Runoff. The greenfield runoff calculation in the DS is for the site area whereas the calculated GFR should be based upon the <u>drained area only</u> . I cannot see calculations for this area (0.058ha) in the report.	

	controls can achieve rates much lower than 1l/s. Designer Response 09/01/2026 Harbournstone has concerns about designing to very low discharge rates (e.g., -inability to meet required 24-hour half-drain down times with very low discharge rates, -operational reliability under fine flow conditions, and -potential for surface water flooding due to blockage incidents. Industry Guidance cautions use of very low discharge rates due to the above reasoning, including but not limited to the National Standards for SuDS and CIRIA. It is worth noting also that discharge rates will be reduced by any viable infiltration within the permeable pavement (with allowance for infiltration not modelled but where possible provided for, as advised by ADC Drainage) as well as via rainwater harvesting.	are products on the market which include integral blockage protection for small diameter flow controls. Hydrobrake Optimum would not be the correct flow control device specification for achieving the lowest rate reasonably practicable. 5 times GFR would appear to be 0.8 l/s total for the site. Upstream measures can also be incorporated to manage blockage risk.	appropriate, not withstanding that permeable pavement will provide primary treatment to runoff from the driveway. Proposed runoff is now 1.2 l/s in a 100-year design storm event (and 0.9 l/s in a 1-year storm event). Greenfield rate for the site is 0.8 l/s, as well as the Q-100 rate being 2.5 l/s. The proposed discharge rate is therefore now approximately at existing Greenfield rate for the site, and less than the 5XGFR rate referred to (4.0 l/s). The amended design has aimed to reduce runoff rate as close to permeable pavement as possible, in accordance with the published Arun DC guidance, and it is requested that this is now considered appropriate. If considering the GFR of only the proposed catchment area, the proposed runoff rate is now roughly or less than 5XGFR also	Where this is too low to achieve on a reasonably practicable basis evidence needs to be provided that measures are in place to achieve the lowest rates approaching greenfield runoff and no more than 5 times GFR rate. This is not clear from the DS or the response. It is likely that 5xGFR is lower than that currently proposed as a total discharge from the site and that special consideration of blockage risk reduction upstream of the flow control will be needed and potentially a rate agreed per chamber which is lowest feasible once effective blockage protection is employed.	
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6.	The detailed drainage layout plans does not include finished surface levels. The base level of the permeable pavement storage should also be shown Designer Response 09/01/2026 Finished surface levels are detailed in drawing 002 and base of permeable pavement are detailed in drawing 001; Harbournstone have also provided additional invert levels for completeness in updated plan.	No further comment.			
7.	The planning condition requires proof of consents for any discharge to watercourse. None are submitted. Ordinary Watercourse Consent is required for both outlets and the culverted section of exiting watercourse and 'watercourse corridor improvements' from WSCC. Designer Response 09/01/2026 Discharge consents have been submitted and are currently with Paul Cann for consideration. Final details	Noted, no further comment.			

	have been agreed by email – evidence of Consent to be forwarded upon receipt.				
8.	Construction details should be provided for all drainage elements. Designer Response 09/01/2026 Construction details are provided within drawings 003 and 004, and covers all drainage elements. This was previously submitted so please re-review	Details currently acceptable, may need to be revised in response to comment 5 above			
9.	A surcharged outfall should be used in the drainage model for both outfalls and the design level justified. Designer Response 09/01/2026 Surcharged outfall has been included in the calculations as top of bank, as clearly stated in the report. This was previously submitted so please re-review.	No further comment.			
10.	The permeable paving and flow control should be included in the drainage model. Designer Response 09/01/2026	No further comment.			

	Permeable pavement and flow control features are incorporated in the drainage model. This was previously submitted so please re-review				
11.	The watercourse connection to the rear appears to be outside the planning red line boundary. Confirmation of land ownership or Easement for construction and maintenance access is required together with proof of legal right to discharge to the watercourse if not the Riparian Proprietor. Designer Response 09/01/2026 As our site boundary lies at the centre of the watercourse, we understand we have riparian responsibilities for that ditch It is noted that Ordnance Survey and HM Land Registry datasets can differ, but the Applicant has confirmed the above	Riparian ownership of the ditches is sufficient. No further comment.			

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

Davina Bowley

From: Elaine Walby on behalf of Planning.Responses
Sent: 27 February 2026 16:26
To: Planning Scanning
Subject: FW: Planning Re-Consultation on: AL/118/25/DOC
Attachments: AL-118-25-DOC - Land to the North of the Haven 3 FELv1.docx

PL- Consultation- Engineers response

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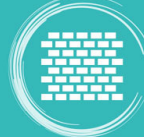
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 27 February 2026 13:12
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: AL/118/25/DOC

Please find enclosed our consultants response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Delivering the right homes in the right places



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Fulfilling Arun's economic potential



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 16 February 2026 15:52
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: AL/118/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	AL/118/25/DOC
Registered:	19th November 2025
Site Address:	Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH
Grid Reference:	493936 105830
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition imposed under AL/104/25/S73 (APP/C3810/W/25/3358593) relating to condition 4-surface water drainage (see AL/118/25/DOC for discharge of conditions 3-Construction Environmental Management Plan, 7-Biodiversity Enhancement Plan, 10-Natural England licence and statement and 12-lighting).

I am able to inform you that I have received an amendment to the above application dated 5th February 2026 relating to: Substitute Drainage statement and response to objections

If you should wish to make further representations as a result of this amendment, please make any further comment by **2nd March 2026**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Amber Willard

Planning Case Officer-Arun District Council

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Email: amber.willard@arun.gov.uk

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