

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/35/26/RES	Reviewer Reference:	ADC/ETX4b
Planning Officer:	Amber Willard	Date of Review:	07/08/2026
Site Name:	Land rear of Meadow Way Westergate		
Application Description:	Approval of reserved matters following outline consent AL/178/22/OUT for appearance, landscaping, layout and scale for the construction of 89 No. residential dwellings, together with open space, landscaping and associated infrastructure, with access taken from Meadow Way (resubmission following AL/137/24/RES). This application is in CIL Zone 3 and is CIL Liable as new dwellings.		
Assessment Number:	1		

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	Advice
----------	--------

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Advice
2. Interception drainage	Insufficient	Advice
3. Extreme Rainfall and Flooding	Insufficient	Advice
4. Water Quality	Insufficient	Advice
5. Amenity	Compliant	Advice
6. Biodiversity	Insufficient	Advice
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Advice

Reviewed Plans

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

- DRAINAGE DETAILS SHEET 1 OF 3 B0457-1505 REVP1, uploaded in 3 parts via public planning portal
- DRAINAGE EXCEEDANCE PLAN B0457-1550 REVP4
- DRAINAGE STRATEGY SHEET 1 B0547-1500 REVP7, uploaded in 3 parts via public planning portal
- ATTENUATION SWALE AND POND SECTION B0457-1509 REVP3
- IMPERMEABLE AREA PLAN B0457-1707 REVP6
- DRAINAGE EXCEEDANCE PLAN B0457-1550 REVP4
- SITE LAYOUT SL.01 REVA
- LOCATION PLAN LP.01 REVA
- DRAINAGE STATEMENT
- PHASE 2 GEO ENVIRONMENTAL GROUND INVESTIGATION
- SW STORAGE ESTIMATE SURCHARGED OUTFALL
- DRAINAGE STATEMENT PART 2, uploaded as part 3,4,5 via public planning portal

Consultation comments to the planning officer

0. General

- 0.1. The surface water drainage conditions that were applied to the outline application are pre-commencement conditions. They do not prescribe that any element of the surface water drainage for the site must be agreed or approved with submission of the reserved matters application.
- 0.2. As the reserved matters do not explicitly include surface water drainage, it is not reasonable to object to the application on those grounds. This is because concerns relating to the surface water drainage of the site, even where it may impact the scale and layout that are proposed, cannot be used as a reason for refusal.
- 0.3. As such, the comments included in this consultation should be read as advice only. There are concerns raised which may impact the scale and layout of the site. The planning officer and applicant are advised to consider these as they will be raised again when an application to discharge conditions is made.
- 0.4. If the applicant cannot satisfactorily discharge the relevant conditions within the proposed scale and layout of the site, then it is expected that a new application for the reserved matters is made. It therefore makes sense for comments relating to surface water drainage to be addressed at this stage to avoid the risk of unnecessary delay and expense if the scale and layout need to be later revised.

1. Runoff destination

- 1.1. Rainwater reuse is the highest priority disposal option in the SuDS hierarchy. This does not appear to be considered or included within the design. No explanation or justification for why rainwater reuse is not proposed is offered. It is expected that opportunities for this will be maximised when an application to discharge the relevant surface water drainage conditions is made.
- 1.2. It is recognised that rainwater reuse is unlikely to provide a total disposal option due to the risk that tanks may overflow, and as such it is always necessary to consider additional options. The later inclusion of rainwater reuse will not significantly impact the scale and layout of the site and as such the absence of it at this stage would not warrant objection.
- 1.3. Groundwater monitoring data has been supplied which shows that ground water depths are within 1m of ground level in all monitored locations. This means that 1m of unsaturated ground cannot be achieved between peak groundwater levels and the base of an potential infiltration features. As such infiltration as a means of surface water disposal has been ruled out – we agree with this conclusion.
- 1.4. Therefore, surface water is to be disposed of via the existing ordinary watercourse network on the site boundaries. This follows the hierarchy for sustainable drainage and we support the approach. No evidence of the flow parameters (discharge rates and volumes) being agreed by the risk management authority have been submitted, for ordinary watercourses this should be from the LLFA; WSCC. However, the lack of objection from the LLFA to this application implies acceptance.

2. Interception drainage

- 2.1. No interception assessment has been submitted. It is noted that the designer refers to an update to the national standards for sustainable drainage systems following the outline application appeal decision. However, interception was one of the design standards of The Suds Manual (which the PPG and ADC Local Plan Policy are both linked to) at that time.
- 2.2. As infiltration is not a viable means of interception due to high groundwater levels, interception may only be delivered via water reuse or evapotranspiration. Evapotranspiration methods involve an open (usually vegetated) surface which can affect scale and layout. Without an assessment of this it is difficult to determine if the proposed permeable paving, attenuation basin and swale provide adequate interception in accordance with The SuDS Manual. Had the condition been linked to the reserved matters application this would warrant objection.
- 2.3. The designer is advised to consider this standard further now, as compliance with the interception standards of The SuDS Manual will need to be demonstrated when discharging surface water drainage conditions.

3. Extreme rainfall and flooding

- 3.1. The discharge rate is set to 3l/s as per the outline application. The greenfield runoff rate has been calculated using the IH124 method. The NSfS prescribe that the Environment Agency's Flood Estimation Guidelines should be used to estimate greenfield runoff rates developed in the Institute of Hydrology Report 124 (IH124 method) and that Flood Estimation Handbook (FEH) methods are preferred. This is due to a higher mean error when using the IH124 method as opposed to the FEH Statistical method. This means that the discharge rate may not be correct. However, the rate of 3l/s is also based upon a lower contributing area and as such the unchanged rate is likely to be acceptable, and not increase flood risk. The applicant should provide justification in this respect.
- 3.2. Justification for the surcharge level will need to be provided when a DOC application is made. The surcharge level will need to be to the top of the bank or to the water level for the 1% AEP + CCA event for the watercourse if modelling is available.
- 3.3. The climate change for the 3.33% AEP event should be 40% (currently set to 35%) this is unlikely to significantly affect the current design but should be corrected for the DOC submission. The modelling does not include the inflows report which demonstrates compliance with regards to volumetric runoff coefficient (CV values), this would warrant an objection to a DOC application or if the drainage condition was linked to the reserved matters as we would need evidence that 100% of the impermeable surfaces are accounted for in the design.
- 3.4. Levels are proposed to be raised across the site, the impact of this level raising appears to be unassessed. However, due to the site's location in flood zone 1 and outside of any areas of surface water flood risk the impact is likely to be restricted to hydrogeological (groundwater). This should be considered further as the level raising appears to exceed 500mm in places.
- 3.5. It is unclear how permeable areas, and impermeable areas such as shed and rear garden patios are accounted for in the design. This will be queried when a DOC application is made.
- 3.6. It will be expected that freeboard between the true ditch bed level and the outfall level is maximised as part of the detailed design process and when the DOC application is made (minimum 150mm). The receiving watercourse is likely to need remedial and/or improvement works to ensure that it is fit for purpose and capable of receiving the proposed flow without increasing flood risk. The applicant

will be expected to submit evidence of the existing watercourse condition as part of the DOC application, including survey data and photographs.

4. Water quality

- 4.1. The designer has classified the access road as a 'low traffic' representing less than 300 traffic movements a day. Further justification for this classification is necessary as a medium traffic road (exceeding 300 movements) would have a higher pollution index in the water treatment assessment.
- 4.2. The assessment also classifies the attenuation basin as a pond or wetland which is inaccurate as it is not designed to have any permanent water. The water treatment assessment needs to be revised to reflect the worst-case treatment train which will not include permeable paving for parts of the highest traffic access road, and for the correct water treatment components and their hazard mitigation indices. Additional water treatment may be necessary which may affect scale and layout.

5. Amenity

- 5.1. The proposal includes an attenuation basin and a swale which are open features providing some amenity value. It is noted that the hard and soft landscaping proposals show these as grassland and no feature planting appropriate to the design and function of the basin is proposed. The permeable paving provides some multifunctional benefit.

6. Biodiversity

- 6.1. The biodiversity enhancement strategy does not appear to consider the SuDS and how these may contribute to any biodiversity enhancement of the site. The

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

- 7.1. The depths of the basin and swale are less than 1.5m which does not increase risk in terms of health and safety.
- 7.2. Measures to protect the drainage from tree roots will need to be detailed as part of the DOC application and construction details for all components will need to be submitted.

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

www.arun.gov.uk

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	 Our core foundations	 
---	--	--	--	--	---

From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 10 August 2026 09:39

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

Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>

Subject: RE: Planning Consultation on: AL/35/26/RES

Please find enclosed our consultants response.

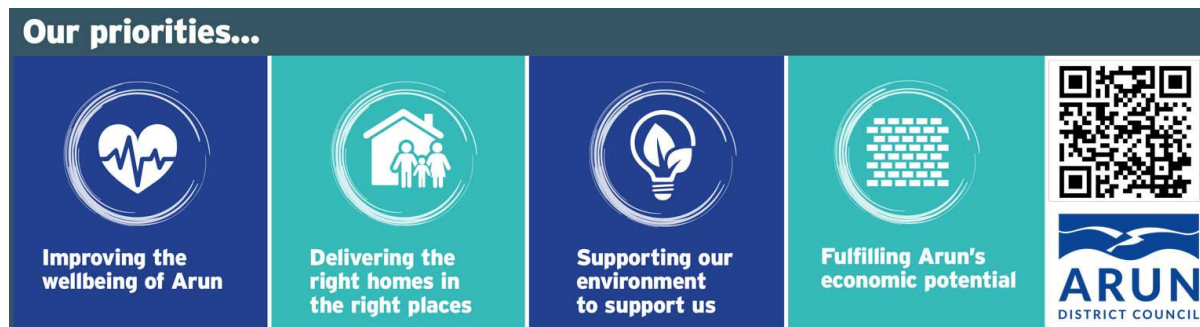
Regards

Paul Cann

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

E: paul.cann@arun.gov.uk



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 27 May 2026 10:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: AL/35/26/RES

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

The Town & Country Planning Act 1990 (as amended)

Town & country Planning (Development Management Procedure) (England) Order 2015 - Article 6

Approval of Reserved Matters Following Outline Approval

Application No: AL/35/26/RES
Registered: 22nd May 2026
Site Address: Land rear of Meadow Way Westergate
Grid Reference: 493620 104816
Description of Works: Approval of reserved matters following outline consent AL/178/22/OUT for appearance, landscaping, layout and scale for the construction of 89 No residential dwellings, together with open space, landscaping and associated infrastructure, with access taken from Meadow Way (resubmission following AL/137/24/RES). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

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.

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 25th June 2026 . 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

PLCONSULT (ODB) 2020