

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/52/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	17/08/2026
Site Name:	The Grange Westergate Street Westergate PO20 3SQ		
Application Description:	Removal of mobile home and replacement with 1 No. self-build dwelling and associated works. This application is in CIL Zone 1 (Zero Rated).		
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	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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Further Information
2. Interception drainage	Insufficient	Further Information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Further Information
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Further Information
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Further Information

Reviewed Plans

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

- Foul and Surface Water Drainage Report Rev P4 (including Lidsey)
- FRA

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

Consultation comments to the planning officer

0. General

- 0.1. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.2. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.3. The site is outside the future year tidal flood zone but is within the wider groundwater risk area and a Flood Risk Assessment has been provided. The site is not at significant risk of flooding from surface water within the lifespan of development. The groundwater flood risk is acceptable.

1. Runoff destination

- 1.1. Water butts are proposed to be provided and are suitable for small scale residential use irrigation. These should be shown on the drainage layout but the plan layout is not constrained and the details can be confirmed at discharge of conditions stage.
- 1.2. Due to high groundwater and poor infiltration as demonstrated by the ground investigation, an infiltration solution would require substantial ground raising to be viable at this site as a method of disposal of surface water runoff.
- 1.3. The site benefits from a drainage ditch which serves the existing property and discharges via stream to the Lidsey Rife. The proposed discharge of surface water to this watercourse is acceptable on the basis of shallow ground water.
- 1.4. The drainage connection details have been approved under a separate application and can be reviewed at discharge of conditions stage.

2. Interception drainage

- 2.1. The drainage layout plan is missing from the drainage report appendices and measures to control interception runoff are not clear. Lined permeable paving is acceptable for the self-drained area. There may be a need for landscaping features such as swale, planters, rain gardens or similar to accommodate the roof area and any hard pavings which are not permeable.

3. Extreme rainfall and flooding

- 3.1. The drainage areas and drainage layout plans are missing from the drainage report appendices. We are unable to assess the drainage proposals or audit the calculations.
- 3.2. The greenfield runoff calculations are not legible in the appendices of the drainage report.
- 3.3. A suitable downstream surcharge should be incorporated to reflect the anticipated top water level in the ditch during the design storm.
- 3.4. The design peak flow rate of 0.1 litre per second is at the lowest end of what we would consider to be practicable and requires enhanced blockage protection. The flow control device is an orifice size of 8mm, which will be susceptible to blockage and require blockage protection. The flow control chamber type is noted to include a blockage grill, which should be checked is suitable for this small orifice size. In addition to measures within the chamber, the design should reduce risk of detritus reaching the flow control chamber by filtering all runoff through the permeable paving or similar measure. No rain water pipe, gully or other inlet should be connected to the chamber without filtering the runoff. This may or may not already be the case and we await submission of the drainage layout plan.
- 3.5. The design to manage extreme rainfall is not currently demonstrated to be in accordance with the requirements of NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. The drainage layout plan is missing from the drainage report appendices and we are unable to assess water quality mitigation. Permeable pavement is a suitable treatment stage for a lightly trafficked driveway and residential parking.

5. Amenity

- 5.1. The drainage layout plan is missing from the drainage report appendices and we are unable to assess amenity as an aspect of multifunctional sustainable drainage design.
- 5.2. The permeable paving and rainwater harvesting could be augmented with small scale SuDS planters / pods or other landscaping features as measures proportionate to the nature and scale of the development.

6. Biodiversity

- 6.1. The drainage layout plan is missing from the drainage report appendices and we are unable to assess biodiversity as an aspect of multifunctional sustainable drainage design.
- 6.2. The permeable paving and rainwater harvesting could be augmented with small scale SuDS planters / pods or other landscaping features as measures proportionate to the nature and scale of the development.

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

- 7.1. From the construction details provided with the drainage report there is no concern regarding the construction and operation of the SuDS features.
- 7.2. The drainage system would be under a single (Homeowner) ownership and a maintenance plan is provided with the drainage report, which will need to be reviewed once the design is received.

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

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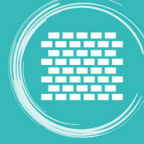
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 18 August 2026 12:22
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: AL/52/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 27 July 2026 16:15
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: AL/52/26/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/52/26/PL
Registered:	27th July 2026
Site Address:	The Grange Westergate Street Westergate PO20 3SQ
Grid Reference:	493982 104365
Description of Works:	Removal of mobile home and replacement with 1 No. self-build dwelling and associated works. This application is in CIL Zone 1 (Zero Rated).

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 August 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

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk

PLCONSULT (ODB) 2020