

Engineers Comments Regarding Surface Water Drainage

Application Reference:	A/43/26/PL	Reviewer Reference:	ADC/EXT2/D2134/103
Planning Officer:	Kathryn Welch	Date of Review:	18.05.2026
Site Name:	Broadlees Dappers Lane Angmering BN16 4EN		
Application Description:	Erection of 19 No dwellings. This application is in CIL Zone 2 and is CIL Liable as a new dwelling.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection subject to conditions
2. Interception drainage	Compliant	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient, requires further design evidence	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient, requires designer summary/statement to address NS	Objection
6. Biodiversity	Insufficient, requires designer summary/statement to address NS	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient, requires designer summary/statement to address NS	Objection

Reviewed Plans

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

- S278 HIGHWAYS WORKS GENERAL ARRANGEMENTS 8220762/6300 REVC1
- LOCATION PLAN AL(9)900
- SuDS MANAGEMENT AND MAINTENANCE STRATEGY
- SUSTAINABLE DRAINAGE STRATEGY REPORT
- RESPONSE TO COMMENTS RECEIVED FROM ADC IN RELATION TO PLANNING CONDITIONS 15 AND 17
- SURFACE WATER DRAINAGE TRACKER

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

Consultation comments to the planning officer

0. General

- 0.1. This application follows the earlier submission made under A/134/24/DOC and the ADC drainage comment tracker has been included within this submission.
- 0.2. The aforementioned comment tracker raised objection where a number of items had not been clarified regarding the permeable pavement thickness/formation depths.
- 0.3. It is noted that the site layout arrangement and drainage layout has been re-designed and the baseline supporting data provided for earlier applications is the same.
- 0.4. As cited before the National Standards now apply, therefore it is prudent that the FRA report is updated to align with the following sections or an addendum.

1. Runoff destination

- 1.1. With reference to previous drainage comments raised under A/134/24/DOC, the strategy remains unchanged where run-off will drain to ground as evidenced by the supporting geotechnical data.
- 1.2. No further comments to raise.

2. Interception drainage

- 2.1. The designer has proposed soakaways to discharge run-off to the ground, therefore intercepting the first 5mm of rainfall with no run-off leaving the site.
- 2.2. Permeable pavement is proposed for all parking areas which caters for the first 5mm. No further comments to raise.

3. Extreme rainfall and flooding

- 3.1. Whilst hydraulic calculations have been provided within appendix F these only appear to cater for the 3 No soakaway proposed as geocellular crates. There are no calculations to qualify the permeable pavement design.
- 3.2. All calculations must also demonstrate the 50% half drain down time lies within 24hrs for the 30yr event.
- 3.3. Drawing 5010 must highlight the overall/total impermeable area including the permeable paved areas.
- 3.4. How are mains services affected by the permeable pavements? It is expected that service corridors will impact the permeable pavement resulting in traditional strips thus reducing the areas shown. The same may also apply to the routing of the foul drain.
- 3.5. There are a number of existing trees however RPZ's areas are not qualified on drawing 5001/P8. Please provide details of the existing/proposed landscaping coordination with SUDS features.
- 3.6. Drawing 5001 key shows a permeable pavement collector drain, however this is not shown on the drawings.
- 3.7. Drawing 5001 key shows a flow control, however this is not shown on the drawings.
- 3.8. Drawing 5001 shows permeable pavement abutting the spine road, however there is not detail for this transition; will there be a check dam and/or waterstop kerb to mitigate overland and sub-base flows?

3.9. Drawing 5011 shows exceedance routing, however does not sufficiently annotate the proposed levels and contours. Please provide a complaint drawing to demonstrate existing/proposed datum and boundary tie-in.

4. Water quality

4.1. With reference to previous drainage comments raised under A/134/24/DOC, all comments have been closed.

4.2. Permeable pavement is proposed. No further comments to raise.

5. Amenity

5.1. No assessment of amenity benefit has been submitted. The minor scale of the development and proposed surface water strategy are expected to reduce flood risk and provide suitable water quality via permeable pavements. The designer shall provide a summary.

6. Biodiversity

6.1. No assessment or statement regarding SuDS biodiversity has been submitted. The minor scale of the development and proposed surface water strategy are expected to reduce flood risk and provide suitable water quality via permeable pavements, and filter pollutants. The designer shall provide a summary.

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

7.1. There is the potential for conflict between proposed trees and drainage infrastructure on the site. As landscaping is to be determined by this application it is expected that these conflicts are resolved.

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

PL- Consultation- Engineers response



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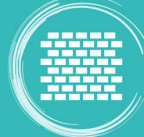
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 20 May 2026 08:54
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: A/43/26/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: 22 April 2026 14:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: A/43/26/PL

To: **Engineers (Drainage)**

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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: A/43/26/PL
Registered: 22nd April 2026
Site Address: Broadlees Dappers Lane Angmering BN16 4EN
Grid Reference: 507322 104587
Description of Works: Erection of 19 No dwellings. This application is in CIL Zone 2 and is CIL Liable as a new dwelling.

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 22nd May 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

Kathryn Welch

Planning Officer- Arun District Council

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Email: kathryn.welch@arun.gov.uk