

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/15/26/PL	Reviewer Reference:	ADC/EXT3/RW
Planning Officer:	Simon Davis	Date of Review:	22/06/2026
Site Name:	Land East of Heath Place Bersted PO22 9SL		
Application Description:	Erection of a 3-storey building comprising of under-croft car parking and bicycle store, 2 floors of 4 No self-contained flats on each (8 No flats in total) with pedestrian access formed onto Ash Grove. This application is in CIL Zone 4 (Zero Rated) as flats.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- PLANNING STATEMENT
- FRA AND SURFACE WATER DRAINAGE
- PROPOSED ELEVATIONS PL03
- PROPOSED FLOOR PLANS PL02
- LOCATION PLAN
- LOCATION AND SITE PLAN SPL01 REVB

Consultation comments to the planning officer

0. General

- 0.1. The level of information provided is more akin to an outline planning application setting up the required constraints for a more detailed design, it does not pass the standard checklist for information provided for a full application, there are questions still unaddressed from the commentary provided for the outline planning application and these will require addressing before the scheme can be conditioned, as the design stands it does not satisfactorily show that the development will not cause an increase in flooding offsite.

0.2. Runoff destination is not fully confirmed, infiltration testing and groundwater monitoring required to prove groundwater is too high for disposal via infiltration, as assumed in the flood risk assessment and drainage statement.

0.3. The existing manhole located north east of the development may serve as a viable connection point or have local infrastructure serving as a constraint for the development, the manhole should be investigated prior to planning being approved.

1. Runoff destination

- 1.1. The drainage statement proposal directs the surface water to an existing public sewer under Ash Grove, with the discharge limited to a restricted rate via an orifice flow control.
- 1.2. Water reuse within the site boundary has not been excluded with the suggestion of rainwater butts being implemented, other rainwater harvesting options should be explored
- 1.3. The runoff hierarchy requires greater exploration to justify the removal of infiltration as a disposal method for the development, Groundwater monitoring or infiltration testing could be utilised as evidence to validate the removal from the scheme, alternatively special constraints with development features.
- 1.4. Paragraph 6.16 of the FRA notes that Heath Place could provide a viable alternative for the drainage outfall, this should be explored before approving the discharge under Ash Grove.
- 1.5. Pre planning application should be submitted to Southern Water to ensure the outfall location is valid and has capacity.

2. Interception drainage

- 2.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, it is not a reason for objection and can be assessed when an application for reserved matters is made.
- 2.2. Consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development. Interception drainage ensures that rainfall from regular rainfall events does not leave the site. This replicates greenfield conditions and goes hand in hand with the management of extreme rainfall events to ensure that development does not increase flood risk.
- 2.3. Where infiltration has not been utilised and there is a risk that interception drainage may only be delivered by evapotranspiration this can have significant impact on the scale and layout of the proposed development.

3. Extreme rainfall and flooding

- 3.1. Top of tank level is noted as 1.95m AOD on the drainage plan within the updated flood risk assessment. The proposed level of the undercroft car park is noted as 1.3m AOD, clarification required on how the system will not back up and flood the undercroft area.
- 3.2. Should pumping be proposed it would only be accepted in exceptional circumstances when all other options have been fully considered The National SuDS guidance notes:
The use of pumping within surface water drainage systems shall be by exception only and agreed with the approving body due to the associated carbon, energy and maintenance implications, and the risks associated with failure and exceedance.

- 3.3. The undercroft car park sits lower than the cover level for the outfall manhole, can the engineer validate that the property will not be at risk of flooding in the event of surcharge to the sewer under Ash Grove.
- 3.4. Is the connection to the outfall manhole being made soffit to soffit, or has pipe surcharge been allowed for?
- 3.5. QBar greenfield Rate is noted as 0.1l/s, the development is proposed to outflow through a 24mm orifice, justification for the sizing of the orifice is required to ensure the development minimises the downstream flood risk.
- 3.6. The SuDS features proposed should be positioned outside of flood zones, and justification provided for the discharge rate during a flood event where the outfall from the development would be surcharged to ensure there is no loss in flood storage volume and that the proposed attenuation features function within storm events. See [SuDS in Flood Areas | Arun District Council](#)

4. Water quality

- 4.1. The development notes that the roof area is low contaminant risk and suggests that silt traps are provided, there is consideration for the allowance for the runoff from the undercroft car park or indication of where the runoff would drain from a water quality perspective, the developer should ensure that the simple index approach is followed for all draining areas and that suitable treatment is provided for all runoff. The designer should aim to treat all rainwater as close to source as possible. Open features which aid water treatment can impact the scale and layout.

5. Amenity, Biodiversity, Construction and Maintenance

- 5.1. No above ground SuDS features have been proposed for the development with basins and swales ruled out for special constraints, there should be justification provided for more localised suds features being excluded.
- 5.2. Each of these standards can impact the scale and layout of the proposed development and the applicant and design team are encouraged to familiarise themselves with our guidance and checklists to avoid objection when a reserved matters application is made.
- 5.3. A maintenance schedule has been included as part of the proposed drainage strategy, more information is required including the ownership and responsibility for the maintenance of SuDS features during the construction and lifetime of the development, standard pro-forma forms to log the actions undertaken as part of maintenance regimes and a maintenance plan indicating the location of as built assets requiring maintenance.

6. Suggested conditions / Overcoming the objection

- 6.1. 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.**

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

From: Elaine Walby on behalf of Planning.Responses
Sent: 22 June 2026 16:14
To: Planning Scanning
Subject: FW: Planning Consultation on: BE/15/26/PL
Attachments: BE-15-26-PL - Land East of Heath Place.docx

PL- Consultation- Engineers response

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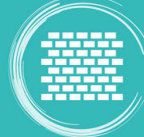
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 22 June 2026 16:06
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: BE/15/26/PL

Please find enclosed our consultants response, an objection.

Regards

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 16 March 2026 11:12
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BE/15/26/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:	BE/15/26/PL
Registered:	13th March 2026
Site Address:	Land East of Heath Place Bersted PO22 9SL
Grid Reference:	493590 101112
Description of Works:	Erection of a 3-storey building comprising of under-croft car parking and bicycle store, 2 floors of 4 No self-contained flats on each (8 No flats in total) with pedestrian access formed onto Ash Grove. This application is in CIL Zone 4 (Zero Rated) as flats.

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 18th April 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

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