

## Engineers Comments Regarding Surface Water Drainage

<b>Application Reference:</b>	BN/125/25/PL	<b>Reviewer Reference:</b>	ADC/EXT4b
<b>Planning Officer:</b>	Amber Willard	<b>Date of Review:</b>	26/01/2026
<b>Site Name:</b>	Land South of The Hollies 84 Barnham Road Eastergate PO22 0ES		
<b>Application Description:</b>	Construction of 2 No. dwellings (C2 Residential Institutions), in association with the Hollies, and associated works. This application affects the setting of a listed building and is in CIL Zone 2 and is CIL Liable as new dwellings.		
<b>Assessment Number:</b>	1 of 2		

Policy and Guidance Information
<p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p>

Response	Objection

References
<p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p>

## 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	<b>Objection</b>
2. Interception drainage	Insufficient	<b>Objection</b>
3. Extreme Rainfall and Flooding	Insufficient	<b>Objection</b>
4. Water Quality	Insufficient	<b>Objection</b>
5. Amenity	Insufficient	<b>No objection subject to conditions</b>
6. Biodiversity	Insufficient	<b>Objection</b>
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	<b>No objection subject to conditions</b>

## Reviewed Plans

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

- PROPOSED GATE ELEVATION 0050 REVP1
- LOCATION PLAN 0040 REVP5
- EXISTING SITE PLAN 0041 REVP04
- PROPOSED BLOCK PLAN 0042 REVP08
- FRA
- BNG METRIC PDF
- SUSTAINABILITY STATEMENT
- SuDS ADN DRAINAGE REPORT
- PRELIMINARY ECOLOGICAL APPRAISAL

## Consultation comments to the planning officer

### 0. General

- 0.1. Insufficient information has been submitted to support the proposed SuDS design, as such, it cannot be confirmed that the scale and layout of the proposed development can be implemented without increasing flood risk. Furthermore, it is noted that no Lidsey Drainage Impact Assessment is

included with the application, this is a validation requirement and necessary to comply with the local plan.

## 1. Runoff destination

- 1.1. Rainwater reuse is proposed in the form of rainwater harvesting tanks which allow rainwater to be reused within the properties. This accords with the hierarchy for sustainable drainage and we support their inclusion. The tanks will need to be designed in accordance with BS EN 16941. The detailed design can be approved via condition as it is unlikely to affect the scale or layout of the development.
- 1.2. Infiltration has been ruled out due to high groundwater levels (within 1m of surface) and poor tested infiltration rates. We support this conclusion with the submission of appropriate evidence. However, no evidence of the ground investigations which support the design have been submitted. Without evidence of the ground investigations, we cannot be sure that they are compliant or accurate and therefore the runoff disposal location may not accord with the hierarchy for sustainable drainage. Therefore, we **object** to the proposal. This is because if infiltration is viable the plan area and volume of any storage is dependent upon the infiltration rate of the ground and the depth of the feature which can be limited by the groundwater levels.
- 1.3. If the applicant is able to submit the necessary evidence of the ground investigations referred to in the drainage strategy, then the proposal to connect to a public surface water sewer accords with the hierarchy. However, no evidence has been submitted to demonstrate that the principle of this connection is acceptable to the asset owner (assumed to be Southern Water). The flow parameters (discharge rates and volumes) should be agreed in writing and confirmation of available capacity should be submitted. This should be submitted in advance of planning permission being granted as if there is insufficient capacity in the sewer then it is unclear how the applicant may sustainably drain rainwater from the site.

## 2. Interception drainage

- 2.1. No assessment of interception drainage has been submitted. As infiltration is unlikely to be viable on the site (see 1.2), interception may only be delivered with rainwater reuse and evapotranspiration. It is unclear if the proposed drainage strategy will deliver interception for the full contributing area of the site. If further interception drainage features are required, then these will likely affect the scale and layout of the proposed development. Therefore, we **object** to the application on this standard until an appropriate interception assessment has been submitted. Further information and guidance relating to interception can be found at [Interception drainage | Arun District Council](#).

## 3. Extreme rainfall and flooding

- 3.1. The proposed discharge rate of 0.5l/s is higher than the target 50% AEP greenfield runoff rate (0.1l/s) or 3l/s/ha (0.135l/s). However, reducing the discharge rate to either of these would increase risk of blockage and therefore increase risk of flooding onsite. To achieve the proposed discharge rate an orifice flow control is proposed, the diameter of this is 13mm. Where an orifice of less than 50mm is required to achieve the peak allowable discharge rate then the flow control should be robustly protected from blockage risk and the risk of blockage assessed and mitigated against. No evidence of this risk assessment has been submitted. It is unclear if alternative flow control measures, with larger orifices have been considered.

- 3.2. It is unclear if the outfall is likely to be surcharged as no information regarding its capacity has been submitted. If surcharging is likely, then this should be modelled to demonstrate that the system will still perform as designed under those conditions.
- 3.3. Contributing areas do not appear to have been accurately modelled, with the area for roof area S2 rounded down. The footpaths to the properties and the patios are also not included. A justification for not including pervious areas has not been submitted.
- 3.4. The node S3 cover level appears to have been modelled incorrectly. The plans show that the cover level should be 9.610, whereas it is set at 7.50 in the model. The invert level of 8.210 is the same on both the plan and the model. This is important as the model shows no flooding on the critical 1%AEP + CCA event with a water level of 9.689m. If the cover level had been 9.610 (as per the plan) then this would show as flooding. When modelled correctly the system may need further storage, it is unclear what capacity may be required or where it may be stored. If the system floods on this event then the designer must show that the flooded volume can be safely contained on site without increasing flood risk.
- 3.5. The connection to the existing surface water sewer relies on crossing third party land. Agreement in principle from the landowners has not been submitted. Similarly, the cover level and invert level are quoted on the plans without the supporting manhole schedules from Sothern Water or surveys to corroborate the levels. This is important to demonstrate that pumping is not necessary.
- 3.6. As such we **object** to the application in relation to this standard. Changes to the surface water drainage design may affect the scale and layout of the proposed development and as such, should not be agreed via conditions.
4. Water quality
- 4.1. No water quality assessment has been submitted. Therefore, we **object** to the proposal which may result in a decrease in water quality if adequate water treatment is not provided.
5. Amenity
- 5.1. The proposed permeable paving provides a limited multifunctional benefit. This means that other parts of the site can be maximised for amenity benefit – like the retained trees and additional hedgerows. However, surface water is not kept at surface in any open water features and the SuDS do not contribute to the green infrastructure network. No assessment of amenity benefit has been submitted, nonetheless we would not object based on this standard assuming that a condition is applied to any planning permission. This is because opportunities to provide amenity benefit on a site of this scale are limited.
6. Biodiversity
- 6.1. No biodiversity risk and opportunity assessment has been submitted. It is unclear what (if any) biodiversity benefits the SuDS offer. As such we **object** on this ground.
7. Construction, operation, maintenance, decommissioning and structural integrity
- 7.1. A tree which is the subject of a tree preservation order (TPO) is present in the southwest of the site. The access to the parking area skirts the root protection zone (RPZ) of this tree, with no-dig construction proposed. There are no pipes within the RPZ of this or any other significant tree and the contributing area of the no-dig drive is accounted for in the design.

7.2. Other elements of this standard, relating to maintenance and construction are unlikely to affect the scale and layout of the development, as such these can be secured via condition.

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 attempt 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

[REDACTED]

[REDACTED]

[REDACTED]








[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

To register to receive notification of planning applications in your area please go to  
<https://www1.arun.gov.uk/planning-application-finder>

**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	 
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**From:** Paul Cann <Paul.Cann@arun.gov.uk>  
**Sent:** 27 January 2026 15:57  
**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 Consultation on: BN/125/25/PL

Please find enclosed our consultants response, an objection.

Regards

**Paul Cann**  
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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**Our priorities...**

 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 22 December 2025 10:49  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: BN/125/25/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:** BN/125/25/PL  
**Registered:** 19th December 2025  
**Site Address:** Land South of The Hollies 84 Barnham Road Eastergate PO22 0ES  
**Grid Reference:** 495759 104587  
**Description of Works:** Construction of 2 No dwellings (C2 Residential Institutions), in association with the Hollies, and associated works. This application affects the setting of a listed building and is in CIL Zone 2 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 on site 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 23rd January 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

Amber Willard

Planning Officer- Arun District Council

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