

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/24/26/DOC	Reviewer Reference:	ADC/EXT2/94
Planning Officer:	Amber Willard	Date of Review:	26/03/2026
Site Name:	Land South Of Wandleys Lane Eastergate PO20 3SE		
Application Description:	Approval of details reserved by condition under BN/46/25/PL relating to conditions 4- Surface Water Drainage and 5- Foul Water Scheme.		
Assessment Number:	2 of 2		

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	Condition 4 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

Standard	Assessment	Response
1. Runoff destination	Compliant	No Objection
2. Interception drainage	Compliant	No 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:

- Drainage Layout Drg no. 476988/501 P01
- Storm Catchment Plan Drg no. 476988/502 P01
- Construction Details. Sheet 1 Drg no. 476988/911 P01
- Construction Details Sheet 2 Drg no. 476988/912 P01
- Drainage Simulation Results 13.02.2026, uploaded in 2 parts via the public planning portal
- Drainage Simulation Results 12.02.2026, uploaded in 3 parts via the public planning portal

Condition wording

Condition 4 is worded as follows:

"Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the agreed drawings, method statement, FRA/Drainage Statement (version 1.0, BP Civils, April 2025 and Drawing Proposed Drainage Plan Dwg. 000-BPC-WD-ZZ-D-C PL007 Rev 0 and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Planning Authority.

Reason: To ensure that the development achieves a high standard of sustainability and to comply with the NPPF and Arun Local Plan policies W DM2 and W DM3."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. The submitted information is insufficient for an assessment of compliance with the NSfS. The applicant must demonstrate how the surface water drainage proposals are compliant with each of the seven standards. It is recommended that applicant reviews the guidance and checklists that are available on the Arun District Council website and submits information that is compliant with the same.

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

Application Reference: BN/24/26/DOC Site Name: Land South Of Wandleys Lane Eastergate PO20 3SE	Initial Issue Date: 26/03/2026 Issue Date: 26/03/2026 Reviewer Reference: ADC/EXT2/94
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Summary and Recommendation:

Condition 4: **Objection**

Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

	ADC Drainage Comments	Designer Response	ADC Drainage Comments		
Date:			02/06/2026		
Condition Number: 4					
Comment Number					
1.	Run-off destination. Submit groundwater depth monitoring and infiltration test results to demonstrate that infiltration a suitable method of drainage.	As attached/included.	Comment closed		
2.	Interception Drainage. Submit an interception drainage assessment demonstrating that the interception requirements have been met.	<i>For developments that infiltrate entirely to ground so no runoff leaves the development for storm events with a 1 in 1 or greater chance of occurring each month, the surface water drainage system is deemed compliant with standard 2. Evidence of this approach shall be provided in the form of calculations and infiltration testing results.</i> Please refer to infiltration results, ground water monitoring and storm water design calculations.	Comment closed		
3.	Extreme rainfall and flooding. Refer to point 1. In addition, submit details of exceedance flow routes demonstrating	Please refer to Site Investigation, infiltration and water monitoring results and flood exceedance plan	Exceedance flow route plan does not appear to have been submitted. Please submit FEH descriptor files		

	that people and property are protected.		to land.drainage@arun.gov.uk		
4.	Water Quality. Submit a water quality assessment.	Please refer to CIRIA SuDS assessment form.	Comment closed		
5.	Amenity. Submit details of how amenity has been considered as part of the drainage proposals.	Surface water is allowed to self-drain to all soft landscaped areas.	Please review the guidance here Standard 5 - Amenity Arun District Council and provide relevant information		
6.	Biodiversity. Submit details demonstrating that the drainage system provides biodiversity benefits.	Source control for the storm water ensures all water is discharged to ground to mimic the current hydrology of the site.	Please review the guidance here Standard 6 - Biodiversity Arun District Council and provide relevant information		
7.	Construction, operation, maintenance, decommissioning and structural integrity. Submit information relating to the ongoing maintenance of the proposed surface water drainage scheme.	Please refer to maintenance plan.	The submitted document has been reviewed against the Arun District Council checklist. The following must be addressed: • Include Approved drawings • Include a plan showing maintenance responsibility • Pre-handover inspection to be stipulated as a requirement • Checklist to facilitate consistent condition inspections • Maintenance record proforma • Green waste disposal		

			• Other waste disposal • Action plan for accidental spillage • Health and safety risk are assessed • Formal procedure to allow changes to the regime • Advice regarding alterations.		
8.	It is unclear what rainfall data has been used for the drainage calculations. (FEH22 rainfall data and Cv of 1 is required, the FEH point descriptor file is to be submitted confidentially to land.drainage@arun.gov.uk)	FEH2022 (point) data has been used for the storm calculations with a global Cv of 1.00 for both summer and winter storms. Please refer to calculations and FEH descriptor file for more details.	Exceedance flow route plan does not appear to have been submitted.		
9.	The calculations for Permeable Paving 3 appear to be based on a 1.2m deep sub base but the plans states 0.675m. Ensure the drawings and calculations are consistent.	Permeable Paving area 3 has been changed to 675mm deep the calculations re-run. Please refer to updated calculations.	Comment closed but refer to comment 13.		
10.	Demonstrate half drain times	Half drain times have been added to the graphs within the calculations.	The half drain times do not appear on the May 2026 version of the calculations. Please provide this information.		
11.	Provide a drawing showing external level.	Please refer to the drg. No. 476988-201 - Levels Layout for more information.	This drawing does not appear to have been submitted.		

12.	Provide sections through the SuDS features, including groundwater level (road long section).	Please refer to Long Sections Drg. No. 476988-550 – Longitudinal Sections for more information.	The road long section appears to show permeable paving construction on Road 1 up to the existing channel line which is not consistent with the drainage plan which appears to show the bellmouth with a different construction. Please provide consistent information and demonstrate that WSCC Highways are agreeable to the interface at the public highway.		
13.	Provide permeable paving formation spot levels on the drawings.	Please refer to the Drg. No. 476988-502 – Drainage Layout for permeable construction formation levels.	Please review the formation levels for PP1, PP2 and PP4 or confirm why they do not have a consistent formation level. Please provide formation levels either side of the check dams. Please review all of the formation levels given. A spot check shows that the lowest point at the end of Road 2 is given on the long sections as 17.449, the formation level is given as 16.85. This does not allow for a 675mm thick sub base. If changes are required, the calculations should also be revised to ensure consistency.		
14.	Provide construction detail and specification for the diffusers	Please refer to updated construction details.	The construction detail refers to a fin drain but depicts a diffuser. Please confirm which		

			is correct and provide a corrected detail.		
15.	Provide specification for the linear channel plus evidence that it is suitable (loading and hydraulic calculations). Consider measures to anchor the concrete blocks that are drawn either side of the channel to prevent them moving and damaging the channel.	The ACO drains have been added to the hydraulic modelling and the simulations re-run. The linear drainage channels will be ACO MonoDrain PD100 0.0 or similar approved. The grating class will D400. They will be installed to suppliers' installation guidance. Please refer to ACO documentation.	The construction detail refers to Hexdrain, please confirm the channel drain specification and provide a corrected detail. Please ensure the detail is consistent with the manufacturer's guidance.		
16.	Provide a catchpit detail.	Please refer to updated Drg. No.476988-911_P01 - Construction Details-- Sheet 1 for more information.	The drawing listed does not appear to show a catchpit detail (it is noted that revision P02 is submitted not P01). A 300mm sump detail is provided on drawing 912, but it appears to be incomplete.		
17.	Show the location of the proposed road gullies on the plan.	There are no proposed road gullies.	The construction detail drawing Sheet 1 includes a road gully detail, the key on the drainage layout includes a road gully. Please demonstrate that WSCC do not require road gullies at the public highway interface.		
18.	The permeable paving construction detail shows a fin drain inlet whereas the plan shows diffusers. Ensure that the drawings area consistent.	Please refer to updated Drg. No.476988-911_P01 - Construction Details-- Sheet 1 for more information.	The construction detail refers to a fin drain but depicts a diffuser. Please confirm which is correct and provide a corrected detail.		

19.	It is unclear how the check dam/baffle will be formed. It is unlikely that the CGA will stand up vertically to allow the liner to be positioned as drawn. This detail is not consistent with manufacturers baffle details.	We have been advised by Marshalls that the MM380 membrane is first placed with the 500mm overlap at the base with 100mm or OGCA stone placed over to hold in place. The vertical section is then held upright with temporary timber while the rest of the aggregate is placed to the underside of the sand laying course. The top overlap is then laid flat before the sharp sand is installed. Please refer to technical literature for more information.	Please add this method of construction to the construction detail.		
20.	Ensure that the notes on the construction detail drawings are relevant and accurate to the requirements of the proposal (eg. note 10 refers to Type 1 sub base which is not relevant in all circumstances)	Notes updated.	Please review and correct the notes on sheet 2, there is reference to 2.7m manhole rings, Sewers for Adoption, Hampshire County Council and Wessex Water.		
21.	Demonstrate all pipes achieve self-cleansing velocity, some are too flat.	Please refer to storm water calculations for more information.	Please review the connection from PS36-ACO.		
22.	Ensure that a catchpit exists before discharge into the permeable paving subbase (eg PS29-DIF)	300mm sump IC's notes added to the Drainage Layout.	This comment still stands; a gully and roof drainage connects to the run downstream of the catchpit.		
23.	Show the connection from the channel drain adjacent to	300mm sump IC's notes added to the Drainage Layout.	This comment still stands, the connection from the channel drain is unclear (possibly due		

	PS5-DIF (must pass through catchpit)		to the dark blue hatch) but it must pass through a catchpit before connecting to the diffuser. Please clarify		
24.	Provide a detail and specification for the root barriers and demonstrate that proposed pipework is adequately protected (eg run between PS3 and PS5-DIF).	As attached/included.	This comment still stands; information has not been provided.		
25.	Provide landscaping proposals demonstrating that they are coordinated with the proposed drainage.	As attached/included.	There is a tree located on top of the pipe run PS2-PS34 on the drainage layout. There is a tree shown very close to the run between PS3 and PS5dif Please review and revise as necessary.		
26.	Provide details of the drainage of the section of road between the permeable paving and the existing road (proposed junction)	Please refer to the S278 pack for more information.	This comment still stands; information has not been provided.		
27.	Ensure manhole schedules are consistent with the plan (diffusers show inlets and outlets which is unlikely)	Updated.	This comment still stands; the diffusers show multiple pipe (A, B C etc). They are also referenced as a Type E Manhole type.		
28.			The invert levels for some of the diffusers do not coincide with the sub base formation levels, which is not consistent with the construction detail. Please review and revise if required.		

29.			The manhole references in the schedule do not cross reference with the construction details. Please ensure the drawings are coordinated.		
30.			The key on the drainage layout refers to permeable bitmac but the construction details show permeable block paving, please update accordingly. If it is proposed to use permeable bitmac, also provide details of how siltation/blockage of the surface will be managed during construction.		
31.			Please demonstrate that it is possible to construct a rodding eye with a depth to soffit of 250mm		
32.			A flap valve is included on the calculations at PS5dif. Please confirm what this is for and if it is necessary provide details on the drawings.		
33.			Please show any services corridors and provide a detail of how they cross the permeable paving.		
34.			The long sections refer to a Type 3 sub base which is not consistent with the construction details. Please correct accordingly.		

35.			The calculations include continuity errors, please demonstrate that this is not to the detriment of the design.																																																								
36.			The calculations do not appear to include the permeable paving storage summary, like this example Permeable Paving Storage <table><tr><th>Permeable Paving</th><th>Critical Storm</th><th>Peak (mm)</th><th>Level (m)</th><th>Depth (m)</th><th>Below (m)</th><th>Flood (m)</th><th>Surface Runoff (m)</th><th>Status</th></tr><tr><td>Permeable Paving 1</td><td>2100 mm Water</td><td>1420</td><td>0.400</td><td>0.375</td><td>0.563</td><td></td><td></td><td>Not Calculated</td></tr><tr><td>Permeable Paving 2</td><td>140 mm Water</td><td>232</td><td>0.073</td><td>0.210</td><td>0.400</td><td></td><td></td><td>OK</td></tr><tr><td>Permeable Paving 3</td><td>140 mm Water</td><td>150</td><td>0.070</td><td>0.161</td><td>0.441</td><td></td><td></td><td>OK</td></tr><tr><td>Permeable Paving 4</td><td>10 mm Rainfall</td><td>22</td><td>0.200</td><td>0.007</td><td>0.800</td><td></td><td></td><td>OK</td></tr><tr><td>Permeable Paving 5</td><td>1000 mm Water</td><td>1000</td><td>0.447</td><td>0.503</td><td>0.100</td><td></td><td></td><td>Not Calculated</td></tr></table>	Permeable Paving	Critical Storm	Peak (mm)	Level (m)	Depth (m)	Below (m)	Flood (m)	Surface Runoff (m)	Status	Permeable Paving 1	2100 mm Water	1420	0.400	0.375	0.563			Not Calculated	Permeable Paving 2	140 mm Water	232	0.073	0.210	0.400			OK	Permeable Paving 3	140 mm Water	150	0.070	0.161	0.441			OK	Permeable Paving 4	10 mm Rainfall	22	0.200	0.007	0.800			OK	Permeable Paving 5	1000 mm Water	1000	0.447	0.503	0.100			Not Calculated		
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If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

PL- Consultation- Engineers response



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www.arun.gov.uk

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Our priorities...



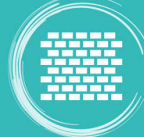
Improving the wellbeing of Arun



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: 04 June 2026 11:05
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 Re-Consultation on: BN/24/26/DOC

Please find enclosed our consultants response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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





From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 01 May 2026 16:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: BN/24/26/DOC

To: **Engineers (Drainage)**

1

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BN/24/26/DOC
Registered:	19th February 2026
Site Address:	Land South Of Wandleys Lane Eastergate PO20 3SE
Grid Reference:	495021 106282
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition under BN/46/25/PL relating to conditions 4- Surface Water Drainage and 5- Foul Water Scheme.

I am able to inform you that I have received an amendment to the above application dated 23rd April 2026 relating to: Substitute drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **16th May 2026**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Amber Willard

Planning Case Officer-Arun District Council

Telephone: 01903 737942

Email: amber.willard@arun.gov.uk

PLRECON_DOC (ODB) 2020