

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/33/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Amber Willard	Date of Review:	01/05/2026
Site Name:	Land South of The Hollies 84 Barnham Road Eastergate PO22 0ES		
Application Description:	Construction of 2 No C2 (residential institution) dwellings and associated works (resubmission following BN/125/25/PL). This application may affect the setting of a listed building and is in CIL Zone 2 and is CIL Liable as new dwellings.		
Assessment Number:	1 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	No objection subject to condition
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 – water reuse design required	No objection subject to conditions
2. Interception drainage	Insufficient – water reuse design required	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient – see comments	No objection subject to conditions
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Insufficient	No objection – relaxation required
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

- LOCATION PLAN 0040 REVP05
- EXISTING SITE PLAN 0041 REVP04
- PROPOSED BLOCK PLAN 0042 REVP08
- DRAINAGE STRATEGY 101 REVP3
- IMPERMEABLE AREAS AND OVERLAND FLOW ROUTE PLAN 101 REVP2
- FRA
- SuDS AND DRAINAGE REPORT
- LIDSEY DRAINAGE IMPACT ASSESSMENT

Consultation comments to the planning officer

0. General - NA
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 groundwater monitoring evidence that has been submitted. The proposal to connect to a public surface water sewer accords with the hierarchy. Paragraph 5.3.7 of the SuDS and Drainage Report includes a quoted paragraph from Southern Water, however, no confirmation of capacity in the receiving sewer has been submitted (in the form of a capacity check). 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 formal assessment of interception drainage has been submitted. As infiltration is not viable on the site, interception may only be delivered with rainwater reuse and evapotranspiration. The designer has included rainwater harvesting tanks which are claimed to allow rainwater to be reused within the properties. They have also included two raised bio-retention planters to capture some of the rainwater from the roofs. Rainwater that falls on the surface of the permeable paving (even if lined) is assumed to be intercepted.
- 2.2. If the rainwater harvesting tanks are designed in accordance with BS EN 16941 (allowing them to be regularly used and having capacity to capture frequent rainfall) it is expected that the interception standard will be met. Therefore, we do **not object** to the application on this standard.

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 a vortex flow control is proposed, the diameter within this is 20mm. 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. Modifications to the design may be required to minimise the risk of flow control blockage.
- 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, rounding of the areas prior to their addition has resulted in the modelled area being approximately 10m² less than it should be. This is unlikely to affect the scale and layout of the development as additional capacity could be provided within the tank if necessary.

3.4. The connection to the existing surface water sewer relies on crossing third party land. As drawn, this is highways land (footpaths) and a greenspace owned by Arun District Council. Agreement in principle from the landowners has not been submitted. If consent is not granted it is unclear how the site will achieve a compliant surface water drainage design that does not increase flood risk as there are no obvious alternative disposal locations. **The planning officer should consider whether this should affect their decision**. In addition to the land ownership questions, as part of the detailed design process the design may need to be modified to ensure that the outfall pipe does not clash with the foul network in Market Close. The levels of the foul network are unknown and will need to be researched and clarified by the designer.

3.5. If it is deemed that this issue should not affect the grant of planning permission, then the remaining issues are unlikely to affect the scale and layout of the site for planning permission purposes and may be resolved and approved via a suitably worded planning condition.

4. Water quality

4.1. A water treatment assessment using the simple index approach has been submitted, this is acceptable and demonstrates that a suitable level of water treatment is provided by the proposed SuDS design. As such, we have **no objection** to the proposal on this standard.

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. Furthermore, raised bioretention planters are included which contribute to the green infrastructure network. No formal 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 despite opportunities to provide amenity benefit on a site of this scale being limited, they are offered.

6. Biodiversity

6.1. No biodiversity risk and opportunity assessment has been submitted. Raised bioretention planters are included which contribute to the green infrastructure network and will provide biodiversity benefit. Opportunities to offer biodiversity benefit on a site of this scale are inevitably limited, therefore it is suggested that the planning officer consider the SuDS contribution in the context of the wider site and biodiversity benefits that are offered in other ways. They may wish to offer a relaxation against national standards for SuDS, and we would have **no objection** to this due to the scale of the site and the effort to include features that provide biodiversity benefit.

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. It appears (from satellite imagery rather than the plans) that the outfall pipe will cross through an area of existing trees. This is unlikely to affect the drainage design as the pipe may be protected without affecting the layout. **However, the tree officer may object to the installation of such drainage infrastructure if damage to the trees is likely to occur.** Please consult them in this regard.

7.3. 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**

8.1. If the planning officer is minded to grant planning permission it is requested that the following condition is applied to ensure that flood risk is not increased by the proposed surface water drainage design:

Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The full details submitted for approval shall include:

1. Details of the proposed method and location of surface water disposal, in accordance with the SuDS hierarchy,
2. Impermeable area plan,
3. Calculations modelling the surface water drainage network for the following storm events:
 - a. 100% Annual Exceedance Probability
 - b. 10% AEP + climate change allowance
 - c. 3.3% AEP + climate change allowance
 - d. 1% AEP + climate change allowance
 All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,
4. Detailed drainage plans conforming to Local Planning Authority guidance,
5. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,
6. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme.

The scheme shall then be constructed as per the approved plans. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority.

Reason: In order to comply with Arun Local Plan policies W DM3 and the NPPF.

8.2. **Please do not list any of the drainage plans or the supporting SuDS AND DRAINAGE REPORT as approved documents.**

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

From:
Sent:
To:
Subject:
Attachments:

Elaine Walby on behalf of Planning.Responses
01 May 2026 15:30
Planning Scanning
FW: Planning Consultation on: BN/33/26/PL
BN-33-26-PL - Land South of the Hollies v1.1.docx

PL- Consultation- Engineers response

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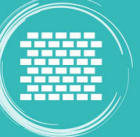
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Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 01 May 2026 13:05
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/33/26/PL

Please find enclosed our consultants response, recommending a condition is applied.

Please be aware that potential land ownership and tree issues, may impact what is possible in terms of draining the site.

Paul Cann
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 10 March 2026 10:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BN/33/26/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:	BN/33/26/PL
Registered:	10th March 2026
Site Address:	Land South of The Hollies 84 Barnham Road Eastergate PO22 0ES
Grid Reference:	495759 104587
Description of Works:	Construction of 2 No C2 (residential institution) dwellings and associated works (resubmission following BN/125/25/PL). This application may affect 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 onsite 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 11th 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

Amber Willard

Planning Officer- Arun District Council

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