

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/33/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Amber Willard	Date of Review:	23/07/2026
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		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

- Proposed Block Plan No.0042 Rev P10
- Drainage Strategy P4
- Impermeable areas and overland flow route plan P3
- FRA
- SuDS and Drainage Report P3 - 21.5.26
- Proposed Site Plan No. 0043 Rev P10
- Flow 19.5.26
- Email to sub and sup drainage documents and plans - 26.5.26
- Email to follow up reconsult 16.6.26

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. The designer has confirmation of available capacity from Southern Water.

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. Leaf guards are now proposed at the rainwater pipes to further reduce risk of blockage. Maintenance and additional measures can be considered via a suitably worded condition.
- 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. 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.

- 3.4. 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)**

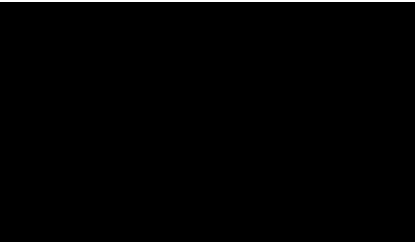
☐ Portsmouth Water (groundwater source protection zones)

☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)

☐ Other: Specify

☐ None

PL- Consultation- Engineers response



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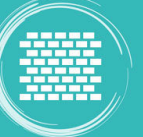
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 27 July 2026 09:28
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/33/26/PL

Please find enclosed our consultants response, requesting a condition.

The planning officer should take note of item 3.3 in the consultation.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 16 June 2026 14:03
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BN/33/26/PL

To: **Engineers (Drainage)**

1

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

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
Category: Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 29th May 2026 relating to:- Supplementary drainage docs and plans

If you should wish to make further representations as a result of this amendment, please make any further comment by **1st July 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Amber Willard

Planning Case Officer- Arun District Council

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