

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/43/26/DOC	Reviewer Reference:	ADC/EXT4
Planning Officer:	Amber Willard	Date of Review:	08/05/2026
Site Name:	Eastmere Stables Eastergate Lane Eastergate PO20 3SJ		
Application Description:	Approval of details reserved by condition under BN/99/22/OUT (Appeal Ref: APP/C3810/W/22/3312864) relating to condition 9- Surface Water Drainage.		
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	Condition 9: No 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
4. Water Quality	Compliant	No objection
5. Amenity	Not assessed	No objection
6. Biodiversity	Not Assessed	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

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

- Proposed Drainage Plan Drg no. AAL436-AAL-SF-XX-DR-C-5101-C05
- Proposed Drainage Plan. Drg no. AAL436-AAL-SF-XX-DR-C-5101-C05
- Surface Water Drainable Areas. Drg no. AAL436-AAL-SF-XX-DR-C-5104-C02
- Factual Letter Report. Dated 12.12.2025 Ref CE25.2049
- Continued Groundwater Monitoring G6737-1 dated 25.03.2026
- Discharge of Conditions Statement.
- Drainage Maintenance Plan. Issue D dated 26.03.2026
- Storm Water Calculations 26.03.2026

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 9:

- Proposed Drainage Plan Drg no. AAL436-AAL-SF-XX-DR-C-5101-C05
- Surface Water Drainable Areas. Drg no. AAL436-AAL-SF-XX-DR-C-5104-C02
- Drainage Maintenance Plan. Issue D dated 26.03.2026
- Drainage Details AAL436-AAL-ED-XX-DD-C-5550-C04
- External Works Details - AAL436-AAL-EW-XX-DD-C-5551-C02
- Proposed Levels Overview - AAL436-AAL-SF-XX-DR-C-5001-C01
- Drainage Notes - AAL436-AAL-ED-XX-LS-C-5102-C02
- Drainage Maintenance Responsibility Plan-AAL436-AAL-SF-XX-DR-C-5103-C01

Condition wording

Condition 9 is worded as follows:

"No construction above ground level shall take place until surface water drainage works have been implemented in accordance with details that first have been submitted to and approved in writing by the Local Planning Authority. The drainage works shall thereafter be maintained. Before any details are submitted to the Local Planning Authority an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system, having regard to Defra's non-statutory technical standards for sustainable drainage systems (or any subsequent version, or equivalent standards), and the results of the assessment shall be provided as part of the surface water drainage works details. Where a sustainable drainage scheme is to be provided, the submitted details shall include: -

- *provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;*
- *include a timetable for its implementation; and,*
- *provide, a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime."*

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.

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/43/26/DOC Site Name: Eastmere Stables Eastergate Lane Eastergate PO20 3SJ	Initial Issue Date: 08/05/2026 Issue Date: 08/05/2026 Reviewer Reference: ADC/EXT4
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Summary and Recommendation:

Condition 9: **No 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	ADC Drainage Comments	
Date:	18/08/2025	01/09/2025	07/10/2025	08/05/2026	
Condition Number: 9					
Comment Number					
1.	ADC response (BN/18/25/DOC) 17/04/2025 ADC would expect at least 4 groundwater monitoring observations over two wet months ideally January and February The groundwater monitoring lasted only for approximately 2 weeks (31/10/24 - 13/11/24) Designer response (BN/18/25/DOC) 17/04/2025 The Drainage Strategy report submitted	Please refer to the supporting statement from Mate Geo-Technical Services, which provides commentary on the soil infiltration testing undertaken for the proposed site. The statement notes that the slowest rate of 3.069 x 10 ⁻⁴ m/s taken within TP4 (which was done at a depth suitable for permeable pavement) is typical across most of the site, with	As per the previous ADC drainage response a single test is insufficient. An interpolated result for the remainder of the extent of the permeable paving is unacceptable. Additional testing should be carried out along the extent of the infiltration "blanket" and at the proposed formation levels and the results used in each	Additional information including groundwater monitoring and infiltration testing has now addressed our previous concerns. Item is now closed	

	at planning stage by Motion contained full winter groundwater monitoring results by Mate Geotechnical Services. These have been appended to this response for ease of reference. ADC response (BN/18/25/DOC) 18/08/2025 This information was not submitted with the current DOC and will need to be. However, the information was reviewed after having to research previous planning applications (BN/128/24/RES). Our consultation on BN/128/24/RES discussed the groundwater monitoring and infiltration testing, and contributed towards our objection at that time. I am not aware of any further testing/monitoring since	the exception of the "made-up" area, where infiltration is not proposed within the drainage strategy. The hydraulic model has been updated to incorporate this value. Winter groundwater levels have been added to the drainage layout and interpolated at key points along the road length. This shows that a freeboard of 771mm is achieved at the site entrance, which is maintained roughly until the northom side of the impermeable membrane section, at which point the freeboard is 688mm. The lowest freeboard is at the end of the road, close to GWP#1, where a freeboard of 575mm is achieved.	section of permeable paving/infiltration blanket designs, A freeboard of less than 1m is unacceptable. A review of the drainage design solution should be undertaken Designer Response 26/03/2026 Additional and extensive BRE365 testing has now been undertaken. Refer to Constructive Evaluation report ref: CE25.2049 6 No. tests were completed alongside the road construction and at the proposed formation levels. Tests generally proved good infiltration potential between 1 and 2 x 10'm/s. The slowest test was in TP06 at 7.96x104m/s.		
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	that application, to support this proposal. Based upon the current design, there are essentially only two groundwater monitoring points with relevant data ie. GWP#1 (Peak GWL 14.216m AOD) and GWP#4 (Peak GWL 13.666m AOD). These are located at either end of the permeable road extents. The road is the sole means of infiltration into the ground. No groundwater data is available for the central areas of the permeable road. In this case, despite the variability in groundwater levels, we are willing to accept that the levels between these two points can be interpreted to provide anticipated groundwater levels along the length of	We would hope that, as per previous sites in this district, the freeboard of 1m, which is generally aimed more at point infiltration features such as soakaways, could be relaxed in this case to facilitate the SuDS design.	The previously submitted hydraulic model was based on a rate of 3.069x10 am/s but this has been re-run with the improved infiltration rate. The model now shows no flooding in all events including the climate change + urban creep scenarios. The 1m freeboard from highest WGM levels to formation of the permeable subbase is now demonstrated via the new winter groundwater monitoring data. Refer to Ground Management Report ref: G6737-1. Three boreholes were monitored regularly over the winter period as agreed at the pre-app meeting. The highest recorded levels have been added to the drainage layout in their		
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	the road. The applicant must show these interpretations on a suitable plan. It is essential that a min. one metre freeboard is achieved between the base of the permeable paving and peak groundwater levels. This is not being achieved in the vicinity of GWP#1 and there may be similar issues once groundwater levels are fully understood for the remaining length of the road. In terms of infiltration testing, there is only one usable test location which is TP4. This was undertaken at a suitable depth and location to reflect the current design. All other tests are at unsuitable depths and locations. Without further testing being provided		correct positions, and a further groundwater level has been interpolated from the readings for completeness of data long the length of the road. Although the levels came extremely close to the 1m freeboard level towards the north of the site following the intense rainfall in February, the 1m freeboard was achieved over the monitoring period in all locations.		
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	at appropriate depths and locations along the permeable road, it is not possible to review the current design. It is a requirement that testing must be undertaken at the depth and location of any infiltration structure, and where there is an extensive longitudinal structure such as proposed, then a suitable number of tests are required along its length. Taking an average rate of all tests undertaken on the site (which are variable) is not acceptable. Therefore, further winter infiltration testing is required at agreed depths and locations to support the design.				
2.	ADC response (BN/18/25/DOC) 17/04/2025 The hydraulic drainage calculations	Please refer to the updated hydraulic model calculations submitted. All pipes and manholes (inclusive of the channel	Thank you for the updated calculations. But updated calculations will be required to take into account of	Item is now closed	

	need to contain the whole drainage network including the private pipes Designer response (BN/18/25/DOC) 17/04/2025 It is not feasible to provide this within the hydraulic model as all the pipes discharge into the subbase blanket in different locations. This request has not been made on other similar infiltration blanket schemes recently approved with ADC. ADC response (BN/18/25/DOC) 18/08/2025 The calculations submitted have not been fully checked due to the fact that the design is likely to change as a result of other comments made. However, the entire network will need	drain at the site entrance) have been modelled as requested. Liaison with the software manufacturer has been undertaken on how best to create a representative hydraulic model for the site. Causeway (the product manufacturer) recommended that a node was provided for each permavoid inlet into the subbase, which would then connect to a common junction node being discharging into a permeable paving node (note that the software does not currently support shared outfalls, hence the introduction of the junction node). The connecting links are reduced to 1m in length to minimize their attenuation potential. The permeable paving subbase was divided into sections based on the proposed	the specific infiltration test results along this road. Designer Response 26/03/2026 The previously submitted hydraulic model has been updated to reflect the newly established infiltration rate of $7.96 \times 10^{-6} \text{ m/s}$ (2.8656m/hr).		
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	to be modelled, which includes the associated pipework/manholes (+channel drain at the entrance) to ensure that the system will perform on all design storms without detriment to property, etc. There are concerns that due to the levels of some of the lower lying properties there may be a flood risk during extreme events and therefore it is important to fully model the system to confirm if this is the case or not. It is suggested that the applicant discusses the best way to achieve the modelling required with the manufacturer of the software. It is noted that the infiltration rate in the calculations is 2.65×10^{-4}, which does	levels strategy (and to keep the hydraulic model manageable) and linked together to represent the total storage area. These links are also 1m in length to minimize their attenuation potential. Causeway deemed the modelling of the private drainage to be superfluous, however it has been actioned for completeness on this occasion. Please refer to the response for item 1 regarding the infiltration rate used for the design. The base slope of the permeable paving has been updated to align with the proposed levels strategy. The FEH xml file has now been provided.			
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	not reflect the average rate specified in the Drainage Statement. Nevertheless, this rate is likely to change based upon item 1 The base slope input for the permeable paving must reflect the design. A copy of the FEH22 point descriptor file will need to be submitted, so that the coordinates and parameters can be checked.				
3.	ADC response (BN/18/25/DOC) 17/04/2025 Provide an impermeable area plan explaining in which pipe each impermeable area will discharge. Designer response (BN/18/25/DOC) 17/04/2025 Catchment Plan now included	Catchment areas added to plan	Please provide areas of permeable paving on the catchment plan Designer Response 26/03/2026 Permeable paving areas now added to the catchment plan	Item now closed	

	ADC response (BN/18/25/DOC) 18/08/2025 Please label indicated areas in m2 and total these areas. There are some slight differences in terms of impermeable areas (plots 6 and 7), between this drawing and the hard landscaping plan - please correct accordingly.				
4.	ADC response (BN/18/25/DOC) 17/04/2025 Provide infiltration testing results undertaken during the wet winter months, (October to March) and in line with BRE365, or a similar approved method. Tests should be repeated 3 times consecutively, to replicate saturated ground conditions. Designer response (BN/18/25/DOC) 17/04/2025 This information was submitted at	Please refer to the response for item T regarding the infiltration rate used for the design.	As per the response to item 1 and previous ADC responses additional winter infiltration tests need to be carried out Designer Response 26/03/2026 Refer to response to item 1. Winter infiltration testing completed.	Item is now closed	

	planning stage within the Motion FRA, We have appended it to this response for ease of reference. ADC response (BN/18/25/DOC) 18/08/2025 See response to item 1.				
5.	ADC response (BN/18/25/DOC) 17/04/2025 A safety factor of 10 should be taken into account at the hydraulic calculations. Designer response (BN/18/25/DOC) 17/04/2025 As the road gently slopes towards the highway, and the buildings are set above the road, we believe that the consequence of failure would be exceedance run-of that would not cause damage to buildings and so, for an area greater than 1000m² and a Cv of 1.0,	Refer to the updated hydraulic calculations which reports minimal flooding in the 1:100YR+45%CC+10%UC event only and for short duration storms. The flooding is very minor (<1m³) and is limited to manholes within gardens, which will not cause damage to buildings, structures or roads. Therefore, the FOS of 5 applied to the permeable paving is appropriate.	Thank you, but updated calculations and exceedance flow assessment will need to be carried out in conjunction with the additional infiltration test results and drainage solution Designer Response 26/03/2026 Updated calculations now show no flooding due to improved infiltration rate. The general exceedance routing plan for potential failure of the system submitted previously therefore still stands, noting that the site gently falls	Item is now closed	

	we have updated the calculations to allow for a FOS=5, which we believe to be appropriate in this case. This leads to the permeable subbase depth increasing to 650mm. ADC response (BN/18/25/DOC) 18/08/2025 Please provide evidence that damage to buildings or structures or roads, will not occur as a result of failure of the permeable paving. See also response to item 4		to the south and so this would be the direction of travel for exceedance flows resulting from system failures.		
6.	ADC response (BN/18/25/DOC) 17/04/2025 Provide specific detailed construction details for each section of permeable paving. Designer response (BN/18/25/DOC) 17/04/2025 There is one permeable paving	The void ratio within the hydraulic calculations has been amended to 30%, in accordance with the construction details.	Thank you item closed Designer Response 26/03/2026 Noted		

	construction detail, but with two options for either permeable or impermeable lining, which is clearly noted on the detail. However we have separated these out to satisfy this request. ADC response (BN/18/25/DOC) 18/08/2025 Permeable paving with infiltration - specify the geotextile proposed and clearly show that it will extend up the sides of the structure. Permeable paving without infiltration (made ground area) - specify the membrane proposed and clearly indicate that it will extend up the west and east sides of the structure only and presumably not the northern and southern ends.				
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	The void ratio specified (30%) in both construction details does not reflect the ratio used in the hydraulic calculations (35%).				
7.	ADC response (BN/18/25/DOC) 17/04/2025 There are occasions where the pipe cover depth near the plots is less than 0.6m. In these occasions concrete bed and surround should be provided. Designer response (BN/18/25/DOC) 17/04/2025 This is covered by the pipe bed and surround details on drawing 5550, which note the differentiation based on location and cover depth. The pipes referred to here would be class Z bedding. ADC response (BN/18/25/DOC) 18/08/2025	Notes now added to also include gardens.	Thank you item now closed Designer Response 26/03/2026 Noted		

	The construction details only refer to verges and carriageways. Please adjust to include areas around buildings/in gardens.				
8.	Indicate permeable paving formation levels on drainage layout plan, for the entire length of permeable road.	This has now been added via 'SBIL' level annotation.	Thank you item now closed Designer Response 26/03/2026 Noted		
9.	Catchpits are required immediately upstream of all diffuser units.	Missing catchpits added to drawing and table	Thank you item now closed Designer Response 26/03/2026 Noted		
10.	Specify all levels associated with the channel drain at the site entrance (ie. Outlet invert, manhole cover and invert, diffuser unit invert. Pipe diameters and gradients also to be shown	Now added to drawing	Thank you item now closed Designer Response 26/03/2026 Noted		
11.	All pipes not connecting to manholes to be connected via oblique 45 degree junctions. Please specify.	Pipes and connection where needed now show oblique connection	Thank you item now closed Designer Response 26/03/2026 Noted		

12.	No pipes to connect against the direction of flow, examples; Connection to manhole north east corner of plot 9 & north side of plot 3.	Pipes updated to show oblique connections to remove apparent against flow connection	Thank you item now closed Designer Response 26/03/2026 Noted		
13.	It is not clear how some of the property driveways/hardstanding's will be drained. Please clearly indicate. The installation of permeable paving in all these areas may help assist in addressing the likely shortfall in storage volume, when the comments in this consultation are taken into account.	Driveways drain either by gullies at low spot into drainage system to diffuser unit fall and drain into permeable paving	All driveways need to be actively drained and cannot simply fall over footway and into permeable highway. This would give rise to a risk of ice forming in winter over the footways Plot 1, 5, 6, 7 & 8 all lack drainage. Designer Response 26/03/2026 Plots 5-8 do not cross footways as the driveways connect directly to the permeable paving, so while we do not tend to agree with the suggested requirement for additional drainage	Item now closed	

			measures here, we have included cut-off ACOs as agreed with the client in the interests of getting this condition discharged.		
14.	Catchpit manhole construction detail - there appears to be text written over text. Please adjust.	Notes tidied up	Thank you item now closed Designer Response 26/03/2026 Noted		
15.	Provide full construction details for channel drain.	Added to drawing	Thank you item now closed Designer Response 26/03/2026 Noted		
16.	Drg 5102 - notes 29 and 30 are irrelevant to this scheme - please remove.	Removed from drawing.	Thank you item now closed Designer Response 26/03/2026 Noted		
Drainage Maintenance Plan					
1.	ADC response (BN/18/25/DOC) 17/04/2025	Updated drawings now included in	Updated design drawings will need to	Item now closed	

	Include the approved design drawings in the document. Designer response (BN/18/25/DOC) 17/04/2025 Now included, see updated document ADC response (BN/18/25/DOC) 18/08/2025 Will need to be updated once the drawings are approved.	RevC, subject to approval	be added on approved drawings Designer Response 26/03/2026 Updated drawings now added and document reissued		
2.	ADC response (BN/18/25/DOC) 17/04/2025 A pre-handover inspection should be stipulated. It should contain a check list to facilitate consistent inspection of the condition of the system. There should be details of who to contact if the surface water drainage system is not functioning correctly Designer response (BN/18/25/DOC)	Typo corrected and additional comments incorporated.	Thank you item now closed Designer Response 26/03/2026 Noted		

	17/04/2025 Now included, see updated document ADC response (BN/18/25/DOC) 18/08/2025 Section 13.0 - typo 'fee' should read 'free'. The inspection should include all manholes, gullies, channel drain and permeable surfaces, to ensure all are fit for purpose, in accordance with the design and in good condition.				
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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

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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...



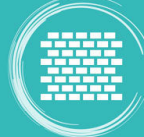
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Delivering the right homes in the right places



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: 15 May 2026 12:29
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/43/26/DOC

Please find enclosed our consultants response, recommending discharge of condition.

Regards

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Improving the wellbeing of Arun



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 08 April 2026 15:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BN/43/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/43/26/DOC
Registered: 7th April 2026
Site Address: Eastmere Stables Eastergate Lane Eastergate PO20 3SJ
Description of Works: Approval of details reserved by condition under BN/99/22/OUT (Appeal Ref: APP/C3810/W/22/3312864) relating to condition 9- Surface Water Drainage.

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **22nd April 2026**.

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.

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 Case Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk