

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/64/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Amber Willard	Date of Review:	10/07/2026
Site Name:	Hill View Eastergate Lane Eastergate PO20 3SJ		
Application Description:	Demolition of existing dilapidated commercial sheds and the erection of 9 No dwellings and associated car parking and landscaping (resubmission following BN/83/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
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 1863-XX-ZZ-DR-A-0302 P03
- Drainage Drawings
- GROUNDSURE STATEMENT
- GROUNDWATER LEVEL MONITORING
- APPEAL DECISION (WA/35/23/OUT)
- APPEAL DECISION (BN/99/22/OUT)
- Drainage Strategy May 26
- Drainage response to engineers
- Drainage Appendices A-D
- Drainage Appendices E-G
- Continued Groundwater Monitoring April 26
- Engineers response
- EMAIL 28.5.26 sub drainage plans

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

-N/A

Consultation comments to the planning officer

0. General

- 0.1. We note the previous application BN/83/25/PL (withdrawn) and our comments made previously on that application dated 12 November 2025.
- 0.2. The submission includes a Drainage Statement with drainage design and calculations supported by ground investigation which includes infiltration testing and winter groundwater monitoring.
- 0.3. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.4. The development proposals are for nine dwellings and therefore the development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.5. We have reviewed the letter report dated 23 June 2026 which responds to our comments dated 18 June 2026.
- 0.6. There is surface water flood risk shown within the site boundary. The latest surface water flood modelling including the 2061 – 2125 epoch is now provided and shows a large area of flood risk including a significant area of between 300-600mm flood water depth within the lifespan of development. The high level assessment that the area of existing flood risk is simply a localised low point which would be removed by the development is therefore not sufficient. The extent of flood risk should be overlayed on the proposed layout for context and the approximate extent of the catchment should be determined to ascertain whether the area of flood risk is due to overland flow from outside the site boundary. The design will need to ensure the flood water is no displaced offsite and that the drainage system can accommodate the additional load if necessary. This should be demonstrated through robust extreme rainfall calculations.
- 0.7. The national surface water modelling does account for losses due to drainage and infiltration. The assertion of the national modelling not being adequate would need to be substantiated through site specific pluvial modelling, which may not be necessary providing a precautionary approach is applied to mitigating the highlighted risks.

1. Runoff destination

- 1.1. The Drainage Statement confirms that water butts are to be provided for each dwelling, this is sufficient for residential houses and can be designed at discharge of conditions stage.
- 1.2. The proposed method of disposal is to discharge to ground via soakaways and permeable paving and infiltration testing is provided at both depths of infiltration feature. Winter groundwater monitoring confirms the base of infiltration features can maintain a minimum 1m vertical offset from seasonal high groundwater levels.
- 1.3. The ground investigation is sufficient to support the proposed runoff destination, which is therefore acceptable.

2. Interception drainage

- 2.1. Interception drainage is provided by permeable pavement and infiltration features.

3. Extreme rainfall and flooding

- 3.1. The strategy should assess the latest national surface water flood risk modelling and demonstrate how the system will function without storage being depleted by surface water or overland flow from outside the positively drained catchment.
- 3.2. There may be a need to incorporate additional land drainage for overland flow identified by the surface water risk modelling and to prevent displaced floodwater. See General comments above. This should be identified in the design at planning stage to demonstrate the feasibility of the solution.
- 3.3. Calculations are provided for the 1% AEP plus 45% climate change event for the drained area and show no flooding. Drain-down times for the 3.3% AEP storm are acceptable.
- 3.4. The letter report text states the permeable paving is modelled at a slope of 1:80 but we are unable to verify this from the calculations. The calculations do not clarify whether the permeable paving is modelled with a flat base of sloping base. Sloping infiltration blankets could overtop from the low end prior to filling. Base levels of constant depth to base should also be indicated on the drainage layout.
- 3.5. Root protection paving typically does not include a depth of stone storage in the same form as permeable paving. The drained areas and infiltration / attenuation of the root protection pavement needs to be included in the design and cannot be omitted.
- 3.6. Management of extreme rainfall is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. Water quality treatment is provided by permeable pavement, which is sufficient for the residential streets.
- 4.2. The residential roofs have a 'very low' pollution hazard (with reference to the SuDS Manual) and should have a minimum water quality management for 'removal of gross solids and sediments only'. This could be achieved with silt traps / catchpits of filter drains as part of the technical design.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible, proportionate to the scale and nature of the development.
- 5.2. Opportunity is limited by the development size, layout and drainage strategy, which drains surface water to ground without the need for surface features. SuDS planters are included and provide some benefit.
- 5.3. As a non-major scheme for residential houses, the limited amenity value provided is proportionate.

6. Biodiversity

- 6.1. The application includes a BNG assessment. Opportunity for biodiversity value delivered through the drainage system is limited by the development size, layout and drainage strategy, which drains surface water to ground without the need for surface features. SuDS planters are included and provide some benefit.
- 6.2. As a non-major scheme for residential houses, the limited biodiversity value provided is proportionate.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. An outline maintenance and operation plan is incorporated within the Drainage Statement.

7.2. A detailed Management and Maintenance Plan can then be conditioned as part of the technical design and assessment to be submitted at approval of details stage.

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 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.

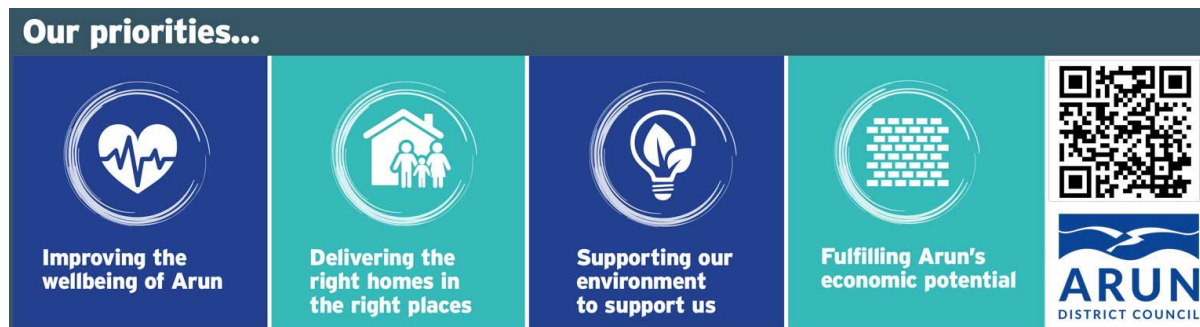
Drainage Impact on Other Planning Matters

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



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 29 June 2026 14:03
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BN/64/26/PL

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/64/26/PL
Registered: 27th May 2026
Site Address: Hill View Eastergate Lane Eastergate PO20 3SJ
Grid Reference: 494858 106055
Category: Plan Applicat'n
Description of Works: Demolition of existing dilapidated commercial sheds and the erection of 9 No dwellings and associated car parking and landscaping (resubmission following BN/83/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.

I am able to inform you that I have received an amendment to the above application dated 24th June 2026 relating to:- Drainage response to Engineers

If you should wish to make further representations as a result of this amendment, please make any further comment by **14th 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

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PLRECON (ODB) 2018