

Engineers Comments Regarding Surface Water Drainage

Application Reference:	R/93/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	06/07/2026
Site Name:	Unit 2 Brookside Avenue Rustington BN16 3LF		
Application Description:	Demolition of existing building and erection of 4 No commercial units with associated access, parking and landscaping works (resubmission following R/224/24/PL). This application is in CIL Zone 4 (Zero Rated) as other development.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
2. Interception drainage	Compliant	Further information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
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:

- SURFACE WATER DRAINAGE DESIGN
- SURFACE WATER DRAINAGE DESIGN PART 2, two submissions under this title
- LOCATION PLAN 0005 REVP02

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. The application is for non-major development. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182 and the measures should be proportionate to the nature and scale of development.
- 0.2. We note the previous refused application R/224/24/PL for similar development and our Engineers Comments dated 11 March 2025. Also that these comments predate the publication of the National Standards for Sustainable Drainage (NSfS).
- 0.3. Preapplication advice was provided dated 3 December 2025 and is attached to the submitted Drainage Statement.
- 0.4. The risk to the development from external flooding is acceptable and we do not object based upon risk to the proposed building or site users from external flood risk.

1. Runoff destination

- 1.1. It is acceptable to omit rainwater collection and reuse for this size and type of development where water demand is limited.
- 1.2. The existing drainage system discharges to the highway drainage system and the Applicant has confirmed with WSCC that the existing connection could be retained.
- 1.3. Ground investigation confirms that winter groundwater levels rise to approximately 2.2m below ground level and that infiltration at around 1.46-1.66m bgl is feasible.
- 1.4. The worst case winter infiltration rate of 1.05×10^{-5} has been used for the proposed base draining permeable pavement and infiltration trench. The base levels of the infiltration features are slightly higher at 3.5m AOD (approximately 1.0-1.2m bgl) and while this provides reasonable evidence at planning, further infiltration testing at the location and depth of each infiltration feature will be required at discharge of conditions stage.
- 1.5. An alternative option of discharge to the highway drain via the existing connection would provide a fall back option if required.

2. Interception drainage

- 2.1. Interception drainage is currently provided by discharge to ground. This will need to be confirmed as part of determining runoff destination.

3. Extreme rainfall and flooding

- 3.1. The design of the permeable pavement and infiltration trench will need to ensure the effects of concentration of water could not affect the building foundations which may be within the chalk layer. This can be addressed in detail at discharge of conditions stage.
- 3.2. The factor of safety of 5 applied to the infiltration coefficient does not meet the NSfS standard within Table S3.1 which states FoS10 for flooding of roads. It is particularly important to select a robust factor of safety as the infiltration testing was not undertaken at the depth of the proposed infiltration features and earlier testing returned worse results. This may affect the ability to store the design storm within the space available constrained by ground water levels without flooding.
- 3.3. The calculations output file omits the node schedule and drained areas and therefore cannot be fully audited.
- 3.4. Management of extreme rainfall is not currently demonstrated to be in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. The water pollution indices risk is low and water quality mitigation is provided by permeable pavement, which meets the standards set out in the Simple Index Approach.
- 4.2. Water quality is acceptable.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.

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

- 7.1. An outline maintenance and operation plan is incorporated within the drainage statement. This will need to be developed to a detailed maintenance plan and incorporate information on ownership and management responsibilities. A detailed plan can be provided at discharge of conditions 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.

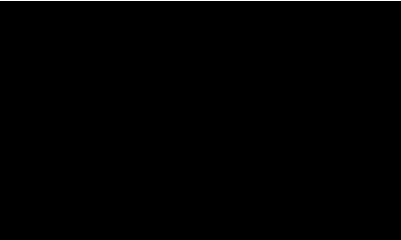
Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that

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

PL- Consultation- Engineers response



Arun District Council, Civic Centre, Maltravers Rd
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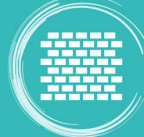
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations





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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 08 July 2026 09:11
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: R/93/26/PL

Please find enclosed our consultants response, an objection.

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



Fulfilling Arun's economic potential





From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 25 June 2026 13:33
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: R/93/26/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:	R/93/26/PL
Registered:	23rd June 2026
Site Address:	Unit 2 Brookside Avenue Rustington BN16 3LF
Grid Reference:	505259 103193
Description of Works:	Demolition of existing building and erection of 4 No commercial units with associated access, parking and landscaping works (resubmission following R/224/24/PL). This application is in CIL Zone 4 (Zero Rated) as other development.

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.

Should you have any comments to make, these should be sent by replying to this email by 30th July 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

Harry Chalk

Planning Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk