

Engineers Comments Regarding Surface Water Drainage

Application Reference:	R/93/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	31/07/2026
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:	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 conditions
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
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
- **Surface Water Drainage Layout - Infiltration 1333-202B**
- **Drainage Notes and Details 1333-301A**
- **Unit 2 Brookside Avenue Technical Note 01**

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- Drawing 1333/202B Surface Water Drainage Layout – Infiltration
- Drawing 1333/301A Drainage Notes and Details

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.
- 0.5. We have reviewed the Technical Note 01 dated 13/07/26 and accompanying drainage layout and details.

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 stage, 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 could provide a fall back option if required.

2. Interception drainage

- 2.1. Interception drainage is currently provided by discharge to ground.

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 and should include geotechnical assessment and confirmation of appropriate structural foundation design.
- 3.2. The factor of safety of 10 applied to the infiltration coefficient meets the NSfS standard within Table S3.1. This is acceptable and robust in terms of comments on Standard 1.
- 3.3. The calculations show unacceptable mass balance for some lower return period storms but the design storm shows 98% which is acceptable. No flooding is shown. The calculations can be confirmed as part of the technical design to discharge conditions.

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. The following three conditions are proposed to control the technical design and implementation of the sustainable drainage system and the successful long term management and maintenance of the system.

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. Detailed drainage plans conforming to Local Planning Authority guidance,
2. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,
3. Infiltration testing strictly in accordance with BRE DG 365 or Ciria R156 Guidance,
4. Impermeable area plan,
5. 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, and d.) 1% AEP + climate change allowance. All storm events must include an allowance for urban creep and surcharged outfalls where appropriate.

The scheme shall then be constructed as per the approved plans. No building shall be occupied until the complete surface water drainage system serving that building has been implemented in accordance with the agreed details. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority. The local authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan and the NPPF. This is required to be a pre commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.

Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the local planning authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose. The scheme shall thereafter be maintained in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained and in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan.

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

[REDACTED]

From: Elaine Walby on behalf of Planning.Responses
Sent: 06 August 2026 15:28
To: Planning Scanning
Subject: FW: Planning Consultation on: R/93/26/PL
Attachments: R-93-26-PL - Unit 2 Brookside Avenue-2.docx

[REDACTED]

[REDACTED]

[REDACTED]

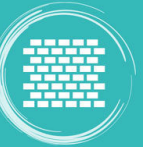
[REDACTED]

[REDACTED]

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 05 August 2026 11:23
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: RE: Planning Consultation on: R/93/26/PL

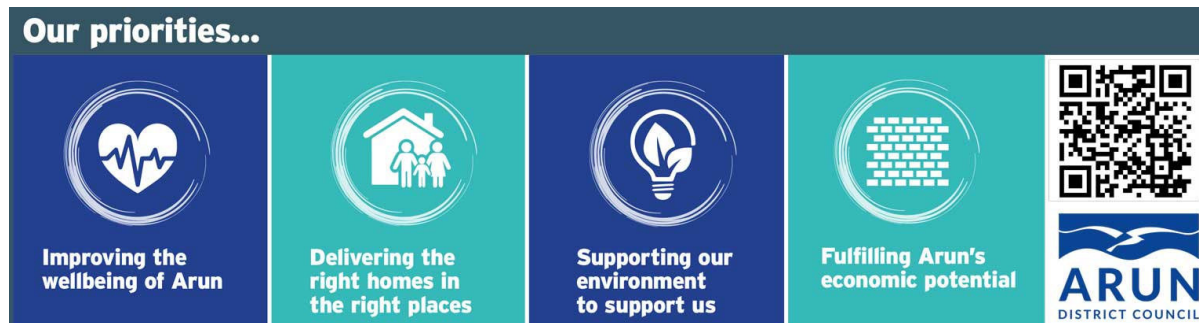
Please find enclosed our consultants response, no objection subject to condition.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 24 July 2026 12:18
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 AND COUNTRY PLANNING ACT 1990

Application No: R/93/26/PL
Registered: 23rd June 2026
Site Address: Unit 2 Brookside Avenue Rustington BN16 3LF
Grid Reference: 505259 103193
Category: Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 22nd July 2026 relating to:- Updated and additional drainage details

If you should wish to make further representations as a result of this amendment, please make any further comment by **17th August 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

Harry Chalk

Planning Case Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk

PLRECON (ODB) 2018