

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/20/26/PL	Reviewer Reference:	EXT2/02
Planning Officer:	Harry Chalk	Date of Review:	06/05/26
Site Name:	Land to the South of The Black Horse Pub Binsted Farm Binsted Lane BN18 0LP		
Application Description:	Siting of 6 No. glamping pods with associated structures, access, car parking and landscaping (part retrospective). This application may affect the setting of a listed building and is in CIL Zone 3 (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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- DRAINAGE STRATEGY 101 REVPL-
- IMPERMEABLE AREAS AND OVERLAND FLOW ROUTE PLAN 401 REVPL-
- SuDS AND DRAINAGE REPORT
- CAUSEWAY DRAINAGE CALCS
- GROUNDWATER MONITORING
- FRA
- SUPPLEMENTARY STATEMENT
-
-

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

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-

Consultation comments to the planning officer

0. General

- 0.1. The submitted information does not demonstrate that the 7 Standards have been complied with for the reasons set out under 1 to 7 below.
- 0.2. The proposed drainage layout does not include existing levels and the information provided regarding proposed levels is limited. It is not possible to assess if the proposed drainage system is suitable for the existing topography.
- 0.3. No information regarding the size of the existing watercourse has been provided nor have the proposed connection details.
- 0.4. Sections through the proposed SuDS features and the outfall have not been provided and it is unclear how the proposed permeable paving will connect to the piped section of the proposed drainage system.
- 0.5. The site layout conflicts with the proposed drainage strategy as it refers to soakaways and a gravel car park, neither of which feature in the surface water drainage strategy. Similarly, point 3.3.3 in the Supplementary Statement also conflicts with the drainage strategy. It is understood that the soakaways are for the disposal of wastewater from the proposed hot tubs. As there is potential for this to cause contamination of groundwater and soil, it is recommended that the Environment Agency are consulted to determine if this method of disposal is appropriate.
- 0.6. It is noted that the drainage strategy is subject to root protection areas. These should be established to confirm that they do not affect the proposed drainage routes.
- 0.7. CGS Drawing 401 refers to an infiltration basin, this conflicts with the drainage strategy.

1. Runoff destination

- 1.1. It is noted that groundwater is too shallow to provide 1m freeboard to permit infiltration methods to be used.
- 1.2. It is likely that the proposed method of disposal is acceptable in principle subject to the following:
- 1.3. Information regarding natural flow paths has not been provided, it is suggested that this should be demonstrated using a topographic survey.
- 1.4. No existing ground levels have been provided so it is unclear if the site can drain by gravity to the existing watercourse.
- 1.5. It is unclear if the applicant has the right to make a connection to the existing watercourse, it is described as being located at the southern boundary of the site and it outside of the red line boundary.
- 1.6. It should be demonstrated that the existing watercourse is a viable receptor in terms of its condition and routing (it appears to be culverted for at least some of its length).
- 1.7. Rainwater harvesting is proposed but details relating to the sizing are not included and the intended use for the harvested water is not clear. The drawing refers to "garden rainwater harvesting system" and the report states "for use within the units". It should be demonstrated that the volume of water that is collected is appropriate for the intended use, bearing in mind the seasonal use of the development.

2. Interception drainage

- 2.1. No information has been submitted to demonstrate that interception drainage has been considered.

3. Extreme rainfall and flooding

- 3.1. The proposed discharge rate is based on the greenfield runoff calculation. The area used in this calculation is 0.6817Ha and the calculations give a QBar of 1.9l/s. The drained area of the development, which is what the proposed discharge rate should be based on, appears to be 0.068 Ha.
- 3.2. It is noted that the orifice flow control has a diameter of 31mm. Whilst this will need to be reviewed once the correct discharge rate has been established, the risk of a blockage of the flow control must be considered and mitigated.
- 3.3. The exceedance flow routing appears to pass over the area where the proposed basin is located. Information should be provided demonstrating that exceedance flows (including from elsewhere) are conveyed safely around or through the site without compromising the SuDS system.
- 3.4. The calculations do not include any allowance for surcharging of the outfall.
- 3.5. The submitted calculations do not include 50%AEP.
- 3.6. The FEH Point descriptor file should be emailed to land.drainage@arun.gov.uk

4. Water quality

- 4.1. A water quality assessment has not been submitted, it is usually appropriate for a simple index based assessment to be undertaken as set out in the SuDS Manual.

5. Amenity

- 5.1. No information has been submitted to demonstrate how the proposed drainage system provides amenity benefits

6. Biodiversity

- 6.1. No information has been submitted to demonstrate how the proposed drainage system provides biodiversity benefits

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

- 7.1. No information has been provided for this Standard.

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: Elaine Walby on behalf of Planning.Responses
Sent: 07 May 2026 16:21
To: Planning Scanning
Subject: FW: Planning Consultation on: WA/20/26/PL
Attachments: WA-20-26-PL - Land to the South of The Black Horse Pub.docx

PL- Consultation- Engineers response

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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 06 May 2026 11:21
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: WA/20/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 21 April 2026 09:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: WA/20/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Planning Permission

Application No:	WA/20/26/PL
Registered:	2nd April 2026
Site Address:	Land to the South of The Black Horse Pub Binsted Farm Binsted Lane BN18 0LP
Grid Reference:	498069 106381
Description of Works:	Siting of 6 No. glamping pods with associated structures, access, car parking and landscaping (part retrospective). This application may affect the setting of a listed building and is in CIL Zone 3 (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 8th May 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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