

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AB/145/25/DOC	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Kathryn Welch	Date of Review:	02/04/2026
Site Name:	Electricity Sub Station And Gas Valve Compound Ford Road Arundel BN18 9FN		
Application Description:	Approval of details reserved by condition imposed under AB/88/19/PL relating to condition 4-as built drawings concerning drainage.		
Assessment Number:	2 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 4: Objection
-----------------	-------------------------------

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Not applicable	No objection
2. Interception drainage	Not applicable	No objection
3. Extreme Rainfall and Flooding	Not applicable	No objection
4. Water Quality	Not applicable	No objection
5. Amenity	Not applicable	No objection
6. Biodiversity	Not applicable	No 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:

- Survey Report 11260A (produced by Clear View)
- Survey Report 675 (produced by Blaze 21/01/26) Version 1
- Survey Report 675 (produced by Blaze 21/01/26) Version 2
- Survey Report 675 (produced by Blaze 13/02/2026)
-

Condition wording

Condition 4 is worded as follows:

"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 in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. The construction of the surface water drainage for the development has been inadequately evidenced. The construction drawings include revisions which may mean that design condition needs to be discharged. It has not been demonstrated that the construction of the surface water drainage will not increase flood risk and as such we object to discharge of this condition.
3. Please refer to the comment tracker for more detail.

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: AB/145/25/DOC Site Name: Electricity Sub Station And Gas Valve Compound Ford Road Arundel BN18 9FN	Initial Issue Date: 27/03/2026 Issue Date: 02/04/2026 Reviewer Reference: ADC/EXT4b
--	--

Summary and Recommendation:

Condition 4: **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	ADC Drainage Comments			
Date:	09/01/2026	27/03/2026			
Condition Number: 4					
Comment Number					
1.	Insufficient information has been submitted to support discharge of condition 4. Please refer to the Arun District Council SuDS Verification Checklist on the minimum required information that should be submitted with the report. https://www.arun.gov.uk/designer-checklists	The applicant is advised again to refer to the checklist that ADC offer to assist with collating the information that is needed to discharge this condition. https://www.arun.gov.uk/designer-checklists It is also recommended that this comment tracker is used to point us to specific areas of the submission or to answer any comments.			
2.	Provide details on author of the report confirming that the author is independent of the contractors and sub-contractors as well as a suitably qualified civil engineer.	Provided. Point closed.			

3.	Provide an as-built survey of the installed main principle surface water drainage network.				
4.	Provide CCTV survey of the principle surface water drainage.	CCTV of the FW drainage has been submitted. The CCTV survey demonstrates that there is construction debris in the pipes which needs to be cleared. Further questions (objection) relating to the Hydrobrakes in comment 12.			
5.	Some of the approved plans submitted and used to inform this application do not align with those listed on the decision notice for application AB/142/22/DOC, some are not included at all. Where there are changes in the design from that originally approved these should be explained. If any changes are significant a new application to discharge condition 3 may be required.	Comment outstanding. The revision notes state that amongst other things a new aco channel has been added. Is this picking up additional area/surface water that is not accounted for in the model?			
6.	Please submit full construction detail drawings and verification of the bespoke above ground storage tanks. It was an explicit expectation on the decision notice for application AB/142/22/DOC that these details would be submitted to support discharge of condition 4.	Design drawings of the tanks have been submitted. The plan areas of these vary from those approved, however the total volume of storage is the same and acceptable. The revised layout of the tanks (aligning with their design drawings) is not shown on the approved or construction plans. In terms of verification of construction there are			

		2 photographs and no survey or commentary. This is insufficient.			
7.	Please submit construction details and verification of the double covers to ensure adequate access to the flow control chamber associated with outfall 1. It was an explicit expectation on the decision notice for application AB/142/22/DOC that these details would be submitted to support discharge of condition 4.	Point outstanding.			
8.		No information regarding any inspections during or after the construction of surface water drainage by anyone other than the contractor (or CCTV survey company) have been recorded. It appears that the authors are relying on information supplied by the contractor to inform their assessment without inspecting the site themselves. The contractor is not independent and should not be relied upon for verification of their own work. Please provide details of inspections.			
9.		The supplied checklist is marked to confirm that the author's company professional indemnity insurance			

		covers the verification work completed. There is no statement to the same effect within the report, however, the checklist is assumed to reflect this.			
10.		Please provide written confirmation that no trees or other landscaping components have been located in areas which would be detrimental to the drainage infrastructure.			
11.		The FRAP and ordinary watercourse land drainage consent have been provided. However, no evidence that the EA or WSCC have signed off the completed construction has been submitted.			
12.		The author acknowledges that one of the 'Hydrobrakes' had not been installed by the contractor in MH SW21. It is assumed that this is a typo and the author meant to refer to MH SW23. It is claimed that this has been remedied and the reader is directed to the photographs for verification of this. There is one photograph (16) of a flow control manhole. It is not labelled as to which manhole it is and there are two others on the site which remain unphotographed.			

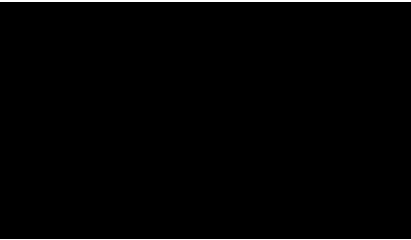
		Only 2 flow control receipts (67mm and 50mm) have been provided. There is no confirmation of the specification for these flow controls or that they will restrict the flow rate to the approved rates in the plans.			
13.		Outfall 1 is shown as concrete bagwork on both planning and OWC approved plans. Photograph 14 show this is not what has been constructed (pre-cast concrete headwall installed instead). As-built levels have not been provided for this outfall.			
14.		The photograph of outfall 2 (15) does not show the outfall pipes. It is not possible to see whether a flap valve has been installed or whether both pipes are connected to the headwall as approved. The headwall requires maintenance (vegetation clearance) and no as-built levels information has been provided. It is unclear why there is a fence in the background crossing the Main River. This is not shown on the topographical survey or the approved plans.			
15.		No survey of any invert levels for pipework or during installation of tanks has been provided.			

16.		The as-built survey is of the levels of the carpark and FFL of the buildings only. It does not reflect the full surface water drainage design and was completed by the contractor who is not independent. The carpark levels shown, if verified by an independent engineer are acceptable. Further information regarding the as-built drainage must be submitted. ☐ Surface water drainage piped network · pipe gradient, cover levels and invert levels. ☐ Tanks – subterranean and suspended · base level, height of tank, (cover level – subterranean only) and plan dimensions. ☐ Permeable Paving · base levels, depth of subbase material. ☐ Flow control devices, inspection chambers and water treatment features · invert levels, cover level, sump level, overflow level, chamber internal dimensions.			
17.		There is insufficient evidence submitted to demonstrate that the impermeable membranes			

		surrounding the tanks and beneath the permeable paving subbase have been constructed in accordance with the manufacturers guidance. Photos (which are insufficient in number and for the number of features) appear to show that the membranes have not been welded. This may allow groundwater ingress and increase flood risk.			
18.		No photographic evidence of the southern storage tank has been provided. It is unclear how this tank has been verified.			
19.		The CCTV shows that there are no perforated pipes in any of the tanks as approved.			
20.		No evidence of the verification of vent pipes which are marked as critical has been submitted. Please verify and confirm their levels.			
21.		Receipts for permeable subbase are provided with no commentary to demonstrate how these have been used to verify construction.			
22.		Photographs of manholes are unlabelled and cannot be verified.			

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...



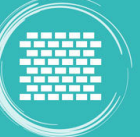
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 07 April 2026 15:15
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: AB/145/25/DOC

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



Our priorities...



Improving the wellbeing of Arun



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: 13 March 2026 14:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: AB/145/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	AB/145/25/DOC
Registered:	2nd December 2025
Site Address:	Electricity Sub Station And Gas Valve Compound Ford Road Arundel BN18 9FN
Grid Reference:	501295 106735
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition imposed under AB/88/19/PL relating to condition 4-as built drawings concerning drainage.

I am able to inform you that I have received an amendment to the above application dated 9th March 2026 relating to: Additional survey report

If you should wish to make further representations as a result of this amendment, please make any further comment by **27th March 2026**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Kathryn Welch

Planning Case Officer-Arun District Council

Telephone: 01903 737789

Email: kathryn.welch@arun.gov.uk

PLRECON_DOC (ODB) 2020