

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/103/25/DOC	Reviewer Reference:	ADC/EXT4
Planning Officer:	Simon Davis	Date of Review:	04/12/2025
Site Name:	Land Adjacent to Woodgate Nurseries Lidsey Road Aldingbourne		
Application Description:	Approval of details reserved by condition imposed under AL/129/21/OUT in relation to conditions 16-Surface Water Drainage Scheme, 17-discharge flows to watercourses and 18-maintenance and management of surface water drainage.		
Assessment Number:	1 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 16: Objection Condition 17: Objection Condition 18: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	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:

- TREE PROTECTION PLAN 24113-6
- PHASE 1 STORM WATER AND FOUL WATER DRAINAGE LAYOUT SHEET 1 DS_0707_15/INF/111 REVC
- PHASE 1 STORM WATER AND FOUL WATER DRAINAGE LAYOUT SHEET 2 DS_0707_15/INF/112 REVC
- PHASE 1 STORM WATER AND FOUL WATER DRAINAGE LAYOUT SHEET 3 DS_0707_15/INF/113 REVC
- PHASE 1 DRAINAGE OWNERSHIP AND MAINTENANCE RESPONSIBILITY PLAN DS_0707_15/INF/114
- PHASE 1 ATTENUATION POND PROPOSED LEVELS, LONG SECTIONS AND SETTING OUT OF COORDINATES DS_0707_15/INF/115

- PHASE 1 ATTENUATION POND AND WATERCOURSE EASEMENTS DS_0707_15/INF/117
- PHASE 1 ADOPTABLE ROAD AND DRAINAGE LONG SECTIONS SHEET 1 DS_0707_15/INF/121 REVA
- PHASE 1 ADDOPTABLE ROAD AND DRAINAGE LONG SECTIONS SHEET 2 DS_0707_15/INF/122 REVA
- PHASE 1 STORM WATER AND FOUL WATER DRAINAGE LONG SECTIONS DS_0707_15/INF/123 REVA
- PHASE 1 FOUL WATER RISING MAIN LONG SECTION DS_0707_15/INF/124 REVC
- PHASED 1 CATCHMENT AREA PLAN DS_0707_15/INF/195
- LANDCAPE GENERAL ARRANGEMENT GLS_020_170_PI_1300 REVH
- SURFACE WATER DRAINAGE STRATEGY
- GROUNDWATER MONITORING LOCATIONS FIGURE 1
- ARBORICULTURAL IMPACT APPRAISAL AND METHOD STATEMENT PHASE 1
- SUDS MAINTENANCE REPORT
- STORM WATER DRAINAGE CALCULATION REPORT
- FRA AND DRAINAGE STRATEGY PART 2
- LLFA LETTER
- ORDINARY WATERCOURSE LAND DRAINAGE CONSENT
- GROUNDWATER MONITORING RESULTS
- ATTENUATION BASINS-DESIGN CALCULATION FOR MITIGATION MEASURES AGAINST THE BUOYANCY FORCE ACTING ON THE WATERPROOF LINER
- DRAINAGE CALCULATIONS REPORT
- Southern Water response

Condition wording

Condition 16 is worded as follows:

“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order 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. 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.”

Condition 17 is worded as follows:

“The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with

current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site. 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. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing”

Condition 18 is worded as follows:

“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.”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. **Condition 16 – Insufficient and conflicting information has been provided. The submitted information does not adequately address concerns that the surface water drainage system will operated without the risk of flooding both onsite and offsite accordingly. Further details and comments are provided in the comment tracker below**
3. **Condition 17 – The consent letter provided by the applicant does not address all details within this condition. Additional consents are still required to be obtained as well as providing evidence of details to ensure proposals due to increase the risk of flooding in these watercourses or offsite**
4. **Condition 18 – Information associated with condition 16 and 17 need to be adequately addressed and included in the maintenance plan before this condition can be discharged.**

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: AL/103/25/DOC Site Name: Land Adjacent to Woodgate Nurseries Lidsey Road Aldingbourne	Initial Issue Date: 04/12/2025 Issue Date: Reviewer Reference: ADC/EXT4
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Summary and Recommendation:

Condition 16 Surface Water Drainage Scheme: **Objection**

Condition 17 Discharge flows to Watercourses: **Objection**

Condition 18 Maintenance and Management of the Surface Water drainage system: **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	Designer Response	ADC Drainage Comments		
Date:	21/10/2025	21/10/2025	04/12/2025		
Condition Number: 16 (SuDS Design)					
Comment Number					
1.	Please refer to the Arun District Council Surface Water Drainage Checklist on the information that should be submitted to support this planning condition. Currently there is a lack of information that has been provided, most notably the surface water drainage calculations. Without these calculations we cannot review whether the proposals meet current policy requirements	Please refer to report: "DS_0707_15 DRP103 Phase 1, Storm Water Drainage Calculation Report"	The drainage report provided does not contain sufficient information: There is no information in relation to proposed departures from the National Standards for SuDS. The submission does not provide clear information on interception drainage nor water quality etc... The Designers need to provide details on how compliance with these standards are being achieved through their		

			design. Currently based on the current proposals it does not appear that compliance with interception drainage An interception assessment is submitted to demonstrate that the first 5mm of rainfall for the majority of rainfall events does not result in runoff from the site. Whilst it is appreciated that infiltration drainage is not being proposed due to the shallow groundwater levels, there doesn't appear to be any provision for rainwater reuse on site		
2.	Surface water calculations need to demonstrate the impact of a potential surcharged outfall of the water level in the receiving watercourse.	Please refer to report: "DS_0707_15 DRP103 Phase 1, Storm Water Drainage Calculation Report", where it's been demonstrated the impact of surcharged outfall on the upstream storm water drainage and attenuation pond.	Calculations provided do not appear to be based on FEH2022 but rather FEH2013. Updated calculations required. Clarification is also required on the modelled surcharged outfall. It appears a ditch surcharge level of 350mm has been used. If this is the case then modelled water levels of this existing ditch needs to be provided to confirm this as the peak		

			stormwater level otherwise per the ADC guidance the bank level of the ditch should be used to assess surcharged events		
3.	Please provide contributing impermeable areas plan	Please refer to drawing: "DS_0707_15/INF/195 Catchment Area Plan"	Noted item closed		
4.	Please provide winter groundwater monitoring data with a clear plan indicating depths of maximum levels and locations of tests	Please find enclosed winter groundwater monitoring data and the enclosed plan indicating location of tests. Tests were carried out during period 23.10.2023 and 13.05.2024.	Noted item closed		
5.	Please provide Winter infiltration testing data	Infiltration to the ground isn't possible for the development due to high ground water table. Please see enclosed FortRidge Flood Risk and Drainage Statement, page9, par.2.22, and p.17, par.5.1	Noted item closed		
6.	Please provide a drainage statement outlining the proposed SuDS hierarchy approach	SuDS hierarchy approach is outlined in the enclosed FortRidge Flood Risk and Drainage Statement, please see pages 19-22	This is insufficient please refer to comment 1 regarding water reuse.		
7.	Please provide proposed landscaping and planting plants which clearly indicate the extent of the proposed root zones to ensure there is no conflict with the proposed drainage	Please find enclosed proposed landscaping layout GLS_020_170_P1_1300 Landscape General Arrangement	There appears to be clashes with proposed tree planting and SuDS basin and ditch easements. This needs to be reviewed and trees removed from easement, or		

			clarification on maintenance operations in in relation to these areas to confirm proposed tree locations will not impede future operations		
8.	Please review extents of drainage runs and clashes with proposed tree planting. There are multiple instances where drainage runs are shown to clash with new trees for eg.. outside plot 22, plot 18, plot 16,50,52,53,55, 56, 85 etc...	Tree locations shown previously don't tie in with the latest landscaping layout. Please find enclosed drainage layout drawings: DS_0707_15/INF/111-113. Some clashes still occur, but there is ongoing coordination between landscape designers and civil engineer, and any existing conflicts are to be resolved before construction phase of the project	Updated information is required as part of the conditions. This information needs to be co-ordinated now		
9.	Please provide buoyancy calculations and detailed proposals for the construction of the SuDS pond/basin to counter the effects of the uplift forces	Please refer to calculation report: "RSK 134658-2-R01, rev.0 - Buoyancy Calculations for Attenuation Basins" The above report is prepared for all attenuation ponds of Phase 1 and 2, therefore please refer to attenuation pond 1 in the calculation report. Buoyance calculations were carried out based on the winter groundwater monitoring data, carried out between 23.10.2023 and 13.05.2024.	Whilst the calculations have been provided the construction details do not appear to have been updated to accommodate recommendations made from this report. Please review the construction details accordingly		

10.	Please provide a clear 3m maintenance easement around the basin and swales, as well as a clear 3m easement to existing watercourses	Please refer to enclosed drawing: "DS_0707_15/INF/117 Phase 1, Attenuation Pond and Watercourse Easements"	The easements clash with trees but concerning also appear clash with proposed buildings, fence lines and screen walls. Please review		
11.	The new swale proposed adjacent to plot 26 and 27 appears to clash with existing trees. Clear information on the existing retained trees with associated root protection areas should be shown on the plan to ensure there are no conflicts	Existing cypress trees (G74 on the enclosed tree protection plan) have been removed. No root protection area is located in vicinity of the swale. Please find enclosed "24113-6 Tree Protection Plan" and "24113-AIA6-PB Arboricultural impact appraisal and method"	Noted item closed		
12.	Please provide site sections with levels	Please find enclosed long section drawings: DS_0707_15/INF/121 to 124	Noted item closed		
13.	Please provide sections and details for both attenuation basin and swale	Please find enclosed drawing: DS_0707_15/INF/115	The details are insufficient and do not correlate with specific requirements identified in RSK Basin calculation report. Detailed construction sections, clearly specifying depth of liner to address buoyancy and backfill depth needs to be provided. Its clear that shallow groundwater is an issue on this site and this construction detail is		

			critical to ensure the basin is correctly installed on site		
14.	Please provide details of SuDS features and measures to ensure adequate treatment of surface water.	Please find enclosed drawing: DS_0707_15/INF/115. Surface water, before entering attenuation pond, will flow through catchpits to separate debris and sediments.	As per item, designer is to review requirements in accordance with National SuDS Standards		
Condition Number: 17 (Watercourses)					
Comment Number					
1.	Please note that the proposals for the construction of the new headwall outfalls and culverting of the existing watercourses will require Ordinary Watercourse consents. Please submit the consent to demonstrate no conflict between approved plans.	Please find enclosed Ordinary Watercourse consent for drainage works on the watercourses, that consist construction of culvers / headwalls, regrading of existing ditches. No consent is required for outfall to watercourse as the outfall profile doesn't encroach into ditch profile.	The drainage layout clearly shows that the headwall encroaches into watercourse, including works to outfall base and erosion control measures. The long section provided noted regrading to the ditch bed level as well. Please provide construction details of outfall to ditch as well as OWC		
2.	Please provide evidence of positive dialogue in relation to the proposed culvert of the watercourse, in terms of capacity assessments and confirmation of ecological and tree protection impacts or mitigation. Some of the proposed headwalls appear	The ordinary watercourse consent on the culvert has been received on 3rd September 2025. No objection has been raised by the WSCC Flood Risk Management Engineer. With regards to tree protection and mitigation	Provide details of design and drawings which have been approved by this OWC		

	to conflict with existing trees and potentially lie within root protection areas of trees. Please provide details of tree removal plan as well as mitigating measures.	please see enclosed "24113- 6 Tree Protection Plan" and "24113- AIA6-PB Arboricultural impact appraisal and method"			
Condition Number: 18 (SuDS Maintenance)					
Comment Number					
1.	No Surface Water Maintenance and Management Plan has been received. The reported submitted is a construction stage surface water management plan. A Maintenance Plan for managing the completed surface water system needs to be submitted. Please refer to the checklist on the Arun District Council website for information that should be supplied	Please refer to: - report: "DS_0707_15 DRP102, SuDS Maintenance Report", - drawing: "DS_0707_15/INF/114 PH1 Drainage Ownership and Maintenance Responsibility Plan	The maintenance plan will need to be based on updated drainage drawing and design once critical items in condition 16 have been fully addressed		
2.					

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.

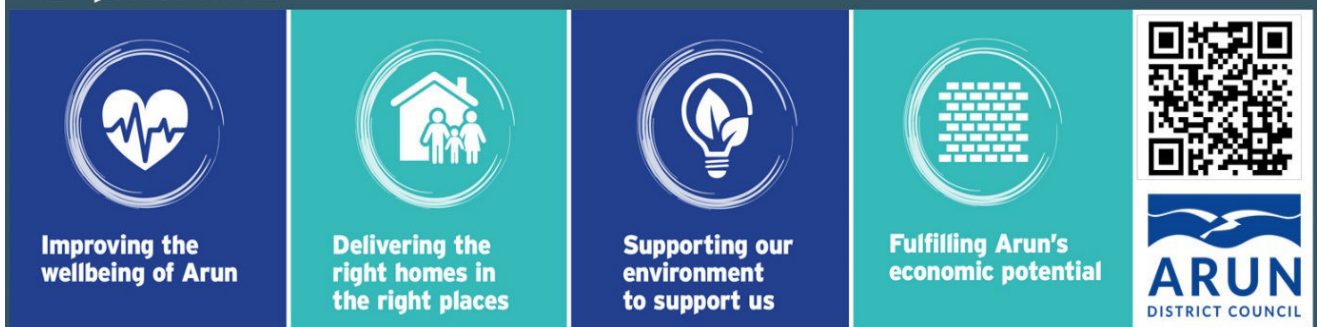
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PL- consultation- drainage response

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Our priorities...



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 08 December 2025 10:03
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>
Subject: AL/103/25/DOC - Woodgate Nurseries

Hi Simon,

Find the consultation – an objection – attached. Apologies for the delay in response.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

Kind regards

Sarah Burrow

Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

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