

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/26/26/S73	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Simon Brooksbank	Date of Review:	08/05/2026
Site Name:	Land adjacent to Woodgate Nurseries, Lidsey Road		
Application Description:	Application under Section 73 of the Town and Country Planning Act to vary Condition 30 of planning permission AL/129/21/OUT, (which is subject to a Section 106 agreement.) Changing the requirement from prior to the occupation of any part of the development to prior to the occupation of the final dwelling.		
Assessment Number:	1 of 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	N/a	N/a
2. Interception drainage	N/a	N/a
3. Extreme Rainfall and Flooding	N/a	N/a
4. Water Quality	N/a	N/a
5. Amenity	N/a	N/a
6. Biodiversity	N/a	N/a
7. Construction, operation, maintenance, decommissioning and structural integrity	N/a	N/a

Reviewed Plans

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

- **Site Location Plan - Phase 1 ST-22-02**
- **Cover Letter date 8th April 2026**

Consultation comments to the planning officer

0. General

1. Condition 30 states:

'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.'

It is understood this application seeks to amend the wording of condition 30 to read:

'Immediately following implementation of the approved surface water drainage scheme and prior to occupation of the final dwelling the developer/applicant shall provide the local planning authority with as-

built survey 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.'

2. The proposed wording seeks to amend the trigger point for occupation of the dwelling approved under outline permission AL/129/21/OUT. The condition originally required that no dwelling be occupied until Condition 30 had been approved; however, this has been altered so that approval is only required prior to occupation of the final dwelling.
3. It is assumed that as the developer wishes to occupy dwellings prior to approval of condition 30; it is also highly likely that they will breach (part of) condition 16 which states 'No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details'
4. We understand the argument for an alteration to the condition wording; however, **we object to this variation**. This arrangement could increase flood risk both on and off site during the construction phase and presents a significant risk to the Authority and future occupiers, since it could not be confirmed as to whether the installed drainage scheme has been fully implemented in accordance with the agreed details and is fit for purpose. This is fundamental to the scheme's success. Furthermore, it exposes both the Authority and future occupiers to significant risk should the developer, for any reason, leave the site prior to the occupation of the final dwelling. In such circumstances, the developer would not be in breach of the condition, and the Authority would have no mechanism to ensure that the as-built development does not increase flood risk on site or elsewhere, particularly if the dwelling remains indefinitely unoccupied and the drainage strategy incomplete.

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



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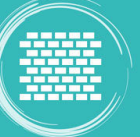
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 15 May 2026 10:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Simon Brooksbank <Simon.Brooksbank@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: AL/26/26/S73

Please find the engineers consultation response attached; an objection.

Kind regards,

Kathryn Welch
Senior Planning Officer, Planning Department

Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

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