

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/30/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Davis	Date of Review:	06/10/2026
Site Name:	Land at Bayards Level Mare Lane Eastergate PO20 3RZ		
Application Description:	Approval of details reserved by condition imposed under AL/113/21/OUT relating to condition 24-as built drawings.		
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	Condition 24: Further information required
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	N/A	
2. Interception drainage	N/A	
3. Extreme Rainfall and Flooding	N/A	
4. Water Quality	N/A	
5. Amenity	N/A	
6. Biodiversity	N/A	
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Further information required

Reviewed Plans

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

- ENGINEERING LAYOUT DRAINAGE SHEET 1 AREA 3 091.5016.0501 REVC06, uploaded in 6 parts via public planning portal
- SUDS VERIFICATION REPORT AREA 5
- SUDS VERIFICATION REPORT AREA 7
- WREKINMANHOLE COVERS
- SuDS VERIFICATION REPORT AREA 3 091.5016/SVR/3.2
- SuDS VERIFICATION REPRT AREA 4 091.5016/SVR/4.2
- SuDS VERIFICATION REPORT AREA 6 091.5016.SBR/6.2
- 10-20PORTSMOUTH GRADING EN12620 10/20 GC85/20 F1,5
- DRIVELINE PRIORA PERMEABLE BLOCK PAVING MARSHALLS AREA 3
- PARTICLE SIZE DISTRIBUTION REPORT 2-6MM WHATLEY AREA 3
- 4-10 PORTSMOUTH GRADING EN12620 4/10 GC85/20 F1,5 AREA 2
- MILLER HOMES PHASE 3 CCTV SUDS REPORT 01/07/24 AREA 3

- SuDS VERIFICATION REPORT 4 091.5016/svr/4.2 AREA 4
- MILLER HOMES PHASE 4 SuDS VERIFICATION REPORT AREA 4 01/07/2024
- SuDS VERIFICATION REPORT PHASE 6 01/07/24
- PCP228 REPORT SECTION INSPECTION AREA 3
- PSCP231 AREA 3
- SuDS VERIFICATION REPORT AREA 2 091.5016/SVR/2.2
- PSCP228 AREA 3
- PORTSMOUTH GRADING AREA 2 EN12620 10/20 GC85/D0 f1,5
- WHATLEY 2-6MM PARTICLE SIZE DISTRIBUTION REPORT AREA 2
- PORTSMOUTH GRADING 4-10 AREA 2 EN12620 4/10 GC85/20 f1,5
- DOVER 420x420-D400 PRODUCT DATA SHEET D400 GROUP 4 AREA 2
- FPM CONCRETE DRAINAGE AREA 2 CERTIFICATE OF CONFORMITY
- GEO LIGHT STORMWATER DRAINAGE MANAGEMENT SYSTEM AREA 2
- LOTRAK 100 TECHNICAL DATASHEET AREA 2
- AGGREGATE GRADING SPECIFICATION DATASHEET MDS 10-20MM PORTSMOUTH AREA 2
- MDS 4-10MM PORTSMOUTH AGGREGATE INDUSTRIES TECHNICAL DEPARTMENT AGGREGATE MATERIAL DATASHEET 4/10MM AREA 2
- MILLER HOMES PHASE 2 CCTV SuDS REPORT AREA 2 01/07/2024
- POLYMODULAR CELL DATASHEET ISSUE 3 JAN2016 AREA 2
- SDS GEOMEMBRANE GSE ULTRAFLEX SMOOTH GEOMEMBRANE DATA SHEET AREA 2
- UNDERGROUND GRAVITY DRAINAGE SYSTEMS DATASHEET AREA 2 ISSUE 3 JUNE 2022
- WHATLEY AGGREGATE PROPERTIES SUMMARY DATASHEET 17-04-23 AREA 2
- UNDERGROUND GRAVITY DRAINAGE SYSTEM DATA SHEET AREA 2 ISSUE 3-JUNE 2022

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 24:

- N/A

Condition wording

Condition 24 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 and 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. We note the previous application AL-24-24-DOC for Area 1 – Plots 1, 2, 3, 4, 5, 47, and 48 which as received partial discharge of C24 for that area.
3. This application as stated on the application form includes the following areas and plots: Area 2 - Plots 50, 53-65 Area 3 - Plots 38-45, 48-49, 51-52 Area 4 - Plots 34-37 Area 6 - Plots 6-11.
4. Please note a verification report for Area 2 – Plots 50, 53-67 – is also included in the submission documents and we have included that area in the comments.
5. Note there is one remaining Area (Area 5) which has not been submitted and therefore full discharge is not applicable.

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/30/26/DOC Site Name: Land at Bayards Level Mare Lane Eastergate PO20 3RZ	Initial Issue Date: 06/10/2026 Issue Date: 06/10/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 24: **Further information required**

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			
Date:	06/10/2026				
Condition Number:					
Comment Number					
1.	Area 2. The verification report para 4.5-4.8 notes defects in the soakaway installation but not whether remedial works have been completed.				
2.	Area 2. The verification report notes that there is no evidence of the permeable paving installation in this area. This is a large area of permeable paving including the whole carriageway and parking areas.				
3.	Area 3. The verification report para 4.4-4.10 notes defects in the soakaway installation but not whether remedial works have been completed.				

4.	Area 3. There are areas of permeable paving which are not evidenced in the verification report including parking areas.				
5.	Area 3. The road drainage soakaway is not evidenced in the verification report. The downstream defender should also be evidenced.				
6.	Area 3. The CCTV survey indicated defects and it is not clear from the verification report whether remedial works have been undertaken.				
7.	Area 4. The verification report para 4.4-4.10 notes defects in the soakaway installation but not whether remedial works have been completed.				
8.	Area 4. There are areas of permeable paving which are not evidenced in the verification report including parking areas.				
9.	Area 4. The road drainage soakaway is not evidenced in the verification report. The downstream defender should also be evidenced.				
10.	Area 6. The verification report notes that the soakaway installations are				

	not evidenced and cannot be verified.				
11.	Area 7. The verification report para 4.4-4.10 notes defects in the soakaway installation but not whether remedial works have been completed.				
12.	Area 7. The verification report notes that there is no evidence of the permeable paving installation in this area. This is a large area of permeable paving including the driveway and parking areas.				
13.	Note – It is particularly concerning that the contractor may have installed soakaways with impermeable membrane thereby containing the runoff. This will lead to flooding and should be remedied as soon as possible.				
14.	Note - The verification report for Area 1 notes the Downstream Defender is not yet installed. This should be evidenced as part of any revisit.				

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.

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>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 06 October 2026 14:05
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: AL/30/26/DOC

Please find enclosed our consultants response, further information required.

Sorry for the delay.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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: 18 May 2026 13:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: AL/30/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL
TOWN AND COUNTRY PLANNING ACT 1990

Application No: AL/30/26/DOC
Registered: 13th May 2026

Site Address: Land at Bayards Level Mare Lane Eastergate PO20 3RZ
Description of Works: Approval of details reserved by condition imposed under AL/113/21/OUT relating to condition 24-as built drawings.

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **2nd June 2026**.

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.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Mr S Davis

Planning Case Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk