

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/54/24/DOC	Reviewer Reference:	ADC/EXT2/D2134/100
Planning Officer:	David Easton	Date of Review:	08.06.2026
Site Name:	Nyton Nursery Nyton Road Westergate PO20 3UQ		
Application Description:	Approval of details reserved by condition imposed under reference AL/3/19/PL relating to conditions 18- as-built drawings of surface water drainage scheme, 19 - surface water drainage scheme, 20 - works to watercourses and 21 - maintenance and management of surface water drainage scheme.		
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 18: **Further information required**

Condition 19: **Further information required**

Condition 20: **No objection**

Condition 21: **Further information required**

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection
2. Interception drainage	N/A	No objection
3. Extreme Rainfall and Flooding	N/A	No objection
4. Water Quality	N/A	No objection
5. Amenity	N/A	No objection
6. Biodiversity	N/A	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	N/A	No objection

Reviewed Plans

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

- 11 documents uploaded on 30/03/2026
- Drainage Verification Report Rev C
- Groundwater Monitoring 29519 L01 (00) CL
- Exploratory Hole Location Plan P1
- Interpretive Report on Site Investigation at Westergate May 2013
- Full scale soakaway test
- Westergate Trial Pit Logs March 2013
- Drainage Engineers response
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Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 18:

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The following plans/documents should be listed as approved in respect to condition 19:

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The following plans/documents should be listed as approved in respect to condition 20:

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The following plans/documents should be listed as approved in respect to condition 21:

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Condition wording

Condition 18 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. 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."

Condition 19 is worded as follows:

"Development shall not commence for any dwelling hereby approved, 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. No building / No part of the extended 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 20 is worded as follows:

"Development shall not commence for any dwelling hereby approved, 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. No construction is permitted, which will restrict current and future land owners 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 21 is worded as follows:

"Development shall not commence for any dwelling hereby approved, 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.

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

Plans Provided:

5655:78 F Catchment Area Plan

5655:92 P2 Groundwater Level Plan

SuDS Maintenance Plan Rev H

-5655:93 A SuDs Ownership Plan Sheet 1

-5655:94 A SuDs Ownership Plan Sheet 2

Flow control detail - 5655:70_H

Catchpits - 5655:22 & 5655:24

Permeable Pavement - 5655:20_R

Pipe bedding details - 5655:21_D

Soakaway & Rodding Eye - 5655:27

24-598 01, 02 & 03 As-built surveys (Trigon Surveys)

5655:71_C Swale 2 Details

5655:81_A Swale 1 & 3 Details

5655:82_A Swale 4 & 5 Details

5655:83_A Swale 6 Details

002.1970-SK5000 - Outline Drainage Strategy

NNRP-MCB-ZZ-ZZ-DR-A-0230-S3-P2 - Replan Area Site Layout

RPS plan: JSL2869_510 Rev D - Detailed Planting Plan 1 of 2

RPS plan: JSL2869_511 Rev B - Detailed Planting Plan 2 of 2

Application Reference: AL/54/24/DOC Site Name: Nyton Nursery Nyton Road Westergate PO20 3UQ	Initial Issue Date: 28.04.2023 Issue Date: 08.06.2026 Reviewer Reference: ADC/EXT2/D2134/100
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Summary and Recommendation:

Condition 18: **Further information required**
Condition 19: **Further information required**
Condition 20: **No objection**
Condition 21: **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	ADC Drainage Comments	ADC Drainage Comments	
Date:	28/04/2023	23/05/2024	27/06/2024	08/06/2026	
	ADC 28/04/2023: Firstly there is some uncertainty we are in receipt of all relevant information from the DOC application in pursuant of the drainage related conditions. Some of the comments below may have been actioned, however for completeness it is requested that the applicant provide a supporting summary and full information by return. Designer response 14/12/2023:	Please see attached information address all points below.	Noted. Comment closed		

	The design was reviewed by Laura Gibbons in 2018 and approved. See attached emails. ADC 21/02/2024: Noted, however the emails supplied were corrupt, please re-send for review.				
Condition Number: 18					
Comment Number					
1.	ADC 28/04/2023: Condition 18 requires confirmation that the surface water drainage system has been installed in accordance with the approved details. Until the details of the proposed surface water drainage system are approved (Condition 19), discharge of this condition cannot be considered. Designer response 14/12/2023: Please see SuDS verification folder. ADC 21/02/2024: The verification report and supporting information does not meet the requirements of ADC verification guidance	Please see as built surveys.	Drawing referenced as 1002-A in the verification report/s is effectively hatched areas denoted and is largely inadequate. Furthermore other drawings such as 5655.03 are revised to 'as-built' however this does not comply with ADC requirements as outlined on the website. Comment outstanding.	The designer has not provide a response or further information to resolve this comment. Comment outstanding.	Please refer to drawing 5655:092_P2, which includes a comparison table of the proposed and as-built plot FFLs for the re-plan area. The comparison demonstrates that all as-built FFLs are at or above the approved design levels. Furthermore, Trigon Surveys Drawing 24-598-01 confirms that the as-built road and footpath levels are generally in accordance with the proposed design levels, with a tolerance of approximately ± 100 mm.

	note: https://www.arun.gov.uk/surfacewater#surfacewaterreport				
2.	ADC 28/04/2023: However, it is noted that details submitted under this application do not meet the requirements of Arun District Councils guidance note for Surface Water Drainage Verification reports. Designer response 14/12/2023: Please see SuDS verification folder with an updated report and referenced drawings. ADC 21/02/2024: As above.	Please see as built surveys.	As above, comment outstanding	The designer has not provide a response or further information to resolve this comment. Whilst as-built level extracts have been submitted, these must be reviewed via the verification process. Comment outstanding.	As above
3.					
Condition Number: 19					
Comment Number					
1.	ADC 28/04/2023: Whilst the surface water drainage strategy may be acceptable in principle, the submitted documents do not include winter infiltration testing or groundwater monitoring.	Please see drawing '5655-92 Groundwater Plan'. This shows the test locations. Groundwater contours have been drawn connecting similar recorded levels at different test locations, passing through locations. The recorded levels show groundwater	Drawing 5655-92 identifies the test locations, however the annotation for each is difficult to read and this comment has not been actioned as requested. Whilst a mark-up of the RSK drawing has been	The designer has not provide a response or further information to resolve this comment. Comment outstanding.	Refer to MJA Drawing 5655-MJA-SW-XX-DR-C-092 combining the requested information.

	Designer response 14/12/2023: Please see groundwater levels in "Westergate - Interpretive Report for Site Investigation FINAL 17-05-13" as well as '29519L01_00_CL_KF Groundwater Monitoring' which shows the results for groundwater monitoring between October 2017 and April 2018. The groundwater levels are also shown as contours on the engineering layouts. ADC 21/02/2024: Please summarise the site-wide testing and include a plan GA showing the location of each test pit/monitoring station including peak levels to OS datum. This must also be overlaid with the proposed SUDS features to demonstrate if there are flotation impacts.	generally follows the site's topography, falling from north-east to south-west. Groundwater spot levels (datum) are also shown on infiltration features on the 'SW Attenuation Sheets'.	provided this must be overlaid with the proposal layout and proposed ground levels so depths/freeboard/flotation can be concluded. Comment outstanding		
2.	ADC 28/04/2023: Further to item 3, we may require further consideration of the final surface levels	Please see 'Laura Gibbons Correspondence'	Noted. Comment closed		

	design. For example some subtle ground raising could deliver a more suitable/compliant freeboard. Designer response 14/12/2023: Laura Gibbons checked and approved the freeboards and groundwater levels back in April 2018. ADC 21/02/2024: Again, this may have been agreed previously so please provide the evidence.				
3.	ADC 28/04/2023: The drawings submitted do not appear to cover the whole site. Please provide clarification of the area that the application applies to. Designer response 14/12/2023: Please see engineering layouts sheets 1-4. ADC 21/02/2024: Noted. Please refer to further comments below.				
4.	ADC 28/04/2023:	Please see catchment area plan.	On review of drawing 5655-78/D it	The designer has not provide a response or	

	Please provide a copy of your catchment area plans indicating the catchment for each pipe and infiltration structure reference for the whole site including the access roads. Please note the SW basin/swale areas must be included. Designer response 14/12/2023: Please see catchment area plan with labels. ADC 21/02/2024: No plan was provided.		is noted that the first swale area opposite the FWPS is not in the correct location and undersized implying this is not up to date and there may be further variations in respect of the as-built data once submitted. Whilst the drawing identifies each network catchment, it does not quantify areas and/or where urban creep factors have been applied. Comment outstanding.	further information to resolve this comment. Comment outstanding.	Refer to MJA Drawing 5655-MJA-SW-XX-DR-C-078_F Each catchment area draining to a SuDS feature (Permeable paving or infiltration swale) is identified on the drawing, with the areas where Urban Creep has been applied indicated.
5.	ADC 28/04/2023: Please provide drawings showing levels for surface water drainage features including all pipes, chamber, headwalls, swales/basins, and permeable paving formations Designer response 14/12/2023: Please see engineering layouts. ADC 21/02/2024: Noted. Please refer to further comments below.				

6.	ADC 28/04/2023: Please confirm how silt will be collected and removed where rainwater pipes are shown to connect directly to permeable paving sub base. Eg. Plot 122, 125, 126 etc. Designer response 14/12/2023: Silt will be collected via a trapped gully pot. See drawing '5655-22_A Sewer Details' ADC 21/02/2024: This needs to be discussed at detail in the management & maintenance report. Routine gully maintenance dictates gullies will be pressure cleaned which will result in some silt/debris being washed down into the sub-base where no control catchpits can be used to mitigate this. Eventually the sub-base will become clogged resulting in a significant loss of storage and conveyance. Sub-base replacement must be considered. Furthermore this does not comply with CIRIA treatment	Paragraph 4.19 of the SuDS M&M plan details sub-base replacement frequency. The EA have not been consulted. Roof water being discharge to formation level carries minimal contamination risk and the lowest mitigation indices. Gully socks will be added to road gullies.	Noted. Noted, please ensure gully socks, sponges or other equivalent products are installed. Comment closed.		
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	guidance where potentially contaminated material is conveyed to the formation level. Have the EA been consulted in this respect?				
7.	ADC 28/04/2023: Please provide a site plan / topographic survey detailing the historic overland flow routing including flows from off site, through the site. Designer response 14/12/2023: Please see exceedance flow plan. 5655-76_D ADC 21/02/2024: No plan was provided.	Please see attached plan. This was previously submitted.	Noted. Drawing 5655-76 Rev D only indicates the post-completion scenario, however the existing survey needs to be shown in order to compare and appraise.	Drawing 5644:84 has been submitted and is acceptable. Comment closed.	
8.	ADC 28/04/2023: Please provide a site plan detailing the post completion overland flow routing. Designer response 14/12/2023: Please see exceedance flow plan. 5655-76_D ADC 21/02/2024: No plan was provided.	Please see attached plan.	Noted. Comment closed.		

9.	ADC 28/04/2023: Please provide cross sections through the infiltration swales showing existing ground level, groundwater level, maximum water levels, freeboard and the construction of the swale. Designer response 14/12/2023: Please see drawing numbers 71,81,82 Swale 3 was removed during the design process and the attenuation moved to the subbase. ADC 21/02/2024: No plans were provided.	Please see attached plans. This was previously submitted.	Noted. Comment closed.		
10.	ADC 28/04/2023: Please confirm how the ingress of groundwater in to the swales will be managed including calculations and measures to counter uplift from groundwater pressure. Designer response 14/12/2023: Since there are no sealed attenuation features on site	Please see attached plan.	Swale/pond section and peak groundwater freeboard annotation is accepted. As above as-built data is required to verify FFL's. Comment outstanding	The designer has not provide a response or further information to resolve this comment. Comment outstanding.	Please refer to drawing 5655:092_P2, which includes a comparison table of the proposed and as-built plot FFLs for the re-plan area. The comparison demonstrates that all as-built FFLs are at or above the approved design levels.

	uplift calculations are not required. ADC 21/02/2024: As above in item 19/1, further clarification is required.				
11.	ADC 28/04/2023: The proposed floor levels are noted as being subject to alteration on site. It is not possible to fully assess the proposed surface water drainage system or overland flow routes without final levels. Designer response 14/12/2023: The levels shown on the engineering plans are final levels. They are as-built levels. ADC 21/02/2024: As commented above, as-built survey must now verify the FFL's.	Please see attached plans.		The designer has not provide a response or further information to resolve this comment. Comment outstanding.	The comparison of the proposed and as-built FFL demonstrates that all dwellings have been constructed at or above the approved design levels. In addition, Trigon Surveys Drawing 24-598-01 confirms that the as-built road and footpath levels are generally consistent with the approved design, within a tolerance of approximately ± 100 mm. As the approved surface water drainage strategy and overland flow routing were developed based on these design levels, the close correlation between the proposed and as-built levels provides confidence that the intended overland flow routes have been maintained as designed as shown on plan 5655:76_C Exceedance Flows.
12.	ADC 28/04/2023: Please confirm if it is intended to offer the proposed roads for adoption. If they are, please provide confirmation from				

	WSSC that the carriageway drainage proposals are acceptable. Designer response 14/12/2023: The roads are all private. ADC 21/02/2024: Noted, comment closed.				
13.	ADC 28/04/2023: The correct protected strip widths must be shown for all Public Sewer apparatus. The designer must demonstrate all SUDS features are suitably clear and that the adopting authority has approved the adoptable drainage system including confirmation that they accept that permeable paving over the adoptable sewers. Designer response 14/12/2023: Please see S104 technical approval dated 2018. "2018.12.08.S104 TA" Southern Water adopts sewers under permeable only if the subbase is				

	untanked/sealed. All subbase on site is untanked. ADC 21/02/2024: Noted, comment closed.				
14.	ADC 28/04/2023: Engineering drawing must show 3.0m buffer zones from all proposed SuDS features. Designer response 14/12/2023: NA ADC 21/02/2024: Comment outstanding. Where a reduced buffer is proposed, then the designer must clarify how the feature will be maintained and if any additional measures may be necessary i.e. restricted access may require specific plant/machinery, and/or methodology, etc.	Please see updated 3m buffer zones.	Noted. Comment closed.		
15.	ADC 28/04/2023: Please provide full details of the proposed landscaping design. Please note planting is not accepted within the	These will need to be updated by the landscapers.	2 No RPS planting drawings provided only cover part of the site. Please provide full	The designer has not provide a response or further information to resolve this comment.	Refer to RPS landscaping dwgs JSL2869_510 Rev D & JSL2869_511 Rev B

	3.0m buffer/easement and SUDS features. Designer response 14/12/2023: Landscape design drawings attached. JSL_2869_510 RE PLAN and JSL_2869_511 RE PLAN ADC 21/02/2024: The landscaping plans do not show the SUDS swales and/or basins; therefore these designs do not appear to have been coordinated?		site wide coordinated drawings. Comment outstanding	Comment outstanding.	
16.	ADC 28/04/2023: Engineering drawing must show 2.0m buffer zones from all SuDS features with 3rd party boundaries. (This may vary to WSCC highway requirements). Designer response 14/12/2023: Please see drawings with 2m buffer from all swales. ADC 21/02/2024: Please refer to comment 14, these do not appear to be illustrated on the 'all' of the engineering plans.	Please see updated 3m buffer zones.	Noted. Comment closed.		

	Where a reduced buffer is proposed, then the designer must clarify how the feature will be maintained and if any additional measures may be necessary i.e. restricted access may require specific plant/machinery, and/or methodology, etc.				
17.	ADC 28/04/2023: Engineering drawings must show 5m offsets from all soakaways demonstrating that there are no structures within these zones. Designer response 14/12/2023: Please see drawings with 5m buffer from all soakaways ADC 21/02/2024: Noted, these do not appear to be illustrated on the 'all' of the engineering plans.	Please see updated plans.	Noted. Comment closed.		
18.	ADC 28/04/2023: Please provide construction details for the proposed surface water drainage system including details for flow controls.	Please see construction details.	The swale make-ups are not advised in full? Some details show topsoil placed directly above granular material, others show parts of the gravel top may	The designer has not provide a response or further information to resolve this comment. Comment outstanding.	Refer to the following dwgs: *Flow controls - 5655:70_H *Catchpits - 5655:22_A *Permeable Pavement - 5655:20_R & 5655:22_A *Pipe bedding details - 5655:21_D *Soakaway & Rodding Eye - 5655:27

	Designer response 14/12/2023: NA ADC 21/02/2024: Comment outstanding.		have other impervious fill sitting on top? Numerous other details for pipework, bedding, rodding points, catchpits, cellular soakaways, permeable pavement make-ups are missing.	Refer to dwgs: 5655:71_C for Swale 2 5655:81_A for Swale 1&3 5655:82_A for Swale 4&5 5655:83_A for Swale 6 This shows Swales 1,2,3 & 4 construction to be 150mm of grass seeded topsoil on existing ground. Swales 5 & 6 shown to be 150mm of grass seeded topsoil on existing ground with a stone trench below the base sections of the swale wrapped in a permeable membrane.	
19.	ADC 28/04/2023: The Microdrainage calculations are based on FSR with Cv set at 0.75 and 0.84. Calculations based on FSR must have Cv set to 1. Calculations must be based on FEH2022. Designer response 14/12/2023: The site is built. This cannot be changed. The site was designed 5 years ago and this wasn't a requirement at the time. This was never requested during the consultation stage and the many iterations of the design with Laura Gibbons FEH2022 is more recent than the design. ADC 21/02/2024: Noted, however where the verification report identifies	Please see calculations.	Without the correct as-built data it is not possible to conclude if this matches the design. There is insufficient data to confirm what depths permeable pavement have been installed and if the swales plan area and depth are sufficient. Calculations need to be revisited following evidence of variations		The depth of the sub-base beneath the permeable block paving can no longer be verified, as the works have been completed and the areas are now occupied. Consequently, the installed sub-base depth cannot be confirmed through direct inspection. However, ongoing performance reviews demonstrate that all areas are functioning as designed, with no recorded incidents of flooding during intense rainfall events.

	variations 1D calculations may need to be re-visited to compare against the approved design, using the original design criteria to conclude 'if' parts of the site are at risk.				
20.	ADC 28/04/2023: Please provide a catchment plan so that the calculations can be fully checked. Designer response 14/12/2023: Please see drawing 5655-78_D Catchment Area Plan ADC 21/02/2024: No plan was provided.	Please see updated plans.	Noted. Comment closed.		
21.	ADC 28/04/2023: Please provide geotechnical report including infiltration rates so that the calculations can be fully checked Designer response 14/12/2023: Please see attached reports: • Westergate Soakaway Test Results 18.03.13 - 19.03.13	Please see groundwater plan.	Noted, however please read in conjunction with item 1. Comment closed.		

	- Westergate - Interpretive Report for Site Investigation FINAL 17-05-13 - Westergate Trial Pit Logs (March 2013) - Groundwater levels ADC 21/02/2024: As above in item 19/1, further clarification is required.				
22.	ADC 28/04/2023: Calculations appear to use arbitrary levels and gradients. They must be based on design levels shown on the engineering layouts. Designer response 14/12/2023: Changing the levels in the calculations makes no difference to the design. The depth of stone required will not change. ADC 21/02/2024: Disagree. You cannot have a cover level of 100m and invert levels for a swale of 99m when the swale is only 0.5m deep.	With regards to permeable paving, for ease of design we set the default cover level to 100m and the formation level to 99m. We then set the area. Therefore, the top water level within the results becomes the minimum depth of stone required or top water level in the swale. E.g. if it shows 0.378m we know the depth of stone needs to be set at 0.378m. Whether the levels are set at 99.7 or 100.5 makes no difference to the result of 378mm. When each plot is modelled separately and there are hundreds of plots on a site, it becomes incredibly time consuming to change each	The calculations are very difficult to review and your summary suggests that every permeable pavement has been installed to a different depth? This will be difficult for the applicant to verify the as-built depth evidence for each feature. Comment outstanding	The designer has not provide a response or further information to resolve this comment. Comment outstanding.	The depth of the sub-base beneath the permeable block paving can no longer be verified, as the works have been completed and the areas are now occupied. Consequently, the installed sub-base depth cannot be confirmed through direct inspection. However, ongoing performance reviews demonstrate that all areas are functioning as designed, with no recorded incidents of flooding during intense rainfall events.

	The same can be seen from numerous permeable pavements levels which must only focus on the sub-base storage layer. Please revised all calculations to show the correct depths otherwise the 'status' and water level observed is being wholly falsified. Whilst the depth will be corrected this is misleading and does not correctly report situations when the sub-base is at risk or has breached ground level.	file to match the exact levels. We hope this explanation is satisfactory. We have provided some examples in the folder Comment 22. Please see updated calculations.			
23.	ADC 28/04/2023: Please ensure that the calculations are coordinated with the engineering layouts. Some calculations area for structures that do not appear to exist. Eg a trench soakaway calculation is provided for plots 117-122 but there does not appear to be a trench soakaway in this area. Swale 1 is noted as being 0.5m deep on the engineering layout but is 1m deep in the calculations.	Some older calculations linked to previous design revisions were included. These have now been removed. Please see updated calculations.	Noted. Comment closed.		

	Designer response 14/12/2023: Please see updated folder of calculations. Unless specified, single width driveways have a subbase of 790mm and double width driveways have a 430mm subbase. These are based on the worst case scenarios. ADC 21/02/2024: Noted, however your comments does not appear to coincide with the sub-base levels stated on drawing 5655:20. Furthermore in light of item 22 above and the requirements of the verification report, evidence of the sub-base material and formation depths will be required.				
Condition Number: 20					
Comment Number					
1.	ADC 28/04/2023: Other than a copy of the land drainage consent, no details have been submitted in relation to this condition.	Please see OWC correspondence with approved drawings.	Noted. Comment closed		

	Designer response 14/12/2023: NA ADC 21/02/2024: Comment outstanding.				
2.	ADC 28/04/2023: Please provide plans and details for all works to existing watercourses including all realignments, culvertings and outfalls. Designer response 14/12/2023: NA ADC 21/02/2024: Comment outstanding.	Please see OWC correspondence with approved drawings.	Noted. Comment closed		
			It is understood that the OWC works are incomplete. Please ensure notification is given for final site inspections and further as-built evidence is provided thereafter.	Comment closed.	
Condition Number: 21					
Comment Number					
1.	ADC 28/04/2023: Until the details relating to condition 19 have been approved, discharge of this	NA	Noted. Comment closed		

	condition cannot be considered. Designer response 14/12/2023: Noted				
2.			A plan showing maintenance responsibility must be included within the maintenance manual. Plans are included where appropriate showing how suds features and watercourses are accessed for maintenance purposes.	Report Rev G is still missing a maintenance plan. Comment outstanding.	SuDS Ownership plans added to maintenance plan Rev H.
3.			The approved design drawings must be included in the document	The engineering drawings are included, but not the planning approved plans. Comment outstanding.	Refer to dwg NNRP-MCB-ZZ-ZZ-DR-A-0 230-S3-P2 - Site Layout for approved re-plan layout. 002.1970-SK5000 - Outline Drainage Strategy
4.			The report must ensure there are clear details of who to contact if the surface water drainage system is not functioning correctly.	Report Rev G, page 5 now addresses this comment. Comment closed.	
5.			There is no action plan for dealing with accidental spillages of pollutants.	Report Rev G, page 4 now partially addresses this comment, however the EA would not be applicable for all	Additional contact details added to maintenance plan Rev H (para 2.9, page 5).

				eventualities; suggest this is tied with page 5 contact details	
				Comment outstanding.	
6.			There is no advice provided as to what to do if alterations are to be made to the development or, works are to be carried out which may affect the surface water drainage system.	Report Rev G, page 5 now addresses this comment. Comment closed.	

Arun DC Drainage Condition Comments

ADC	MJA Response	ADC (08.06.2026)			
	In meeting on 31st July 2024 with Taylor Wimpey, MJA and Arun DC it was confirmed that the conditions only relate to the re-plan area as shown in the redline boundary provided in this response.	Agreed.			The comments below, while not linked to a specific condition, have been addressed within the responses to the conditions above.
Tedious Site wide calculations...	See above. Calcs to be reviewed are only the re-plan area. MJA and Arun agreed to do a logic check on critical areas within the re-plan area. All calcs in the re-plan area attached.	Noted, however a summary is still outstanding.			
No evidence to verify urban creep factors used.	By comparing the calculations and the catchment area plan it can be shown to have included UC. E.g. Plot 108 has an	This is not accepted for the site-wide design. Please provide a tabulation of each calculation and the corresponding UC applied.			

	area of 118m2 on the catchment plan and 130m2 in the calculations.	Comment outstanding.			
Existing Overland flows not supplied.	Please see drawing 5655-84_A Greenfield flows.	Drawing 5644:84 has been submitted and is acceptable. Comment closed.			
Very difficult to conclude permeable paving depths installed.	Unavailable	Subject to the calculations being re-presented, reviewed and accepted, it may be necessary to undertake intrusive checks where depths are deemed insufficient. Comment outstanding.			
SuDS Verification: Drawing referenced as 1002-A in the verification report is effectively hatched areas denoted and is largely inadequate.	An as-built survey with levels for the concerned re-plan area are provided in drawings As-built Survey for Re-plan area 24-598_01 to 03.	The designer has not provide a response or further information to resolve this comment. Whilst as-built level extracts have been submitted, these must be reviewed via the verification process. Comment outstanding.			
Groundwater: Drawing 5655-92 identifies the test locations, however the annotation for each is difficult to	Please see attenuation sheets for groundwater levels are overlaid onto engineering. Watertable contours have been drawn to ease understanding.	The designer has not provided sufficient evidence with their response. Comment outstanding.			

read and this comment has not been actioned as requested. Whilst a mark-up of the RSK drawing has been provided this must be overlaid with the proposed layout so depths /freeboard/flotation can be concluded.					
Catchment area plans: On review of drawing 5655-78/D it is noted that the first swale area opposite the FWPS is not in the correct location and undersized implying this is not up to date and there may be further variations in respect of the as-built data once submitted. Whilst the drawing identifies each network catchment, it does not quantify areas and/or where urban creep	This swale area is not within the re-plan area under review. This swale lies at the site entrance.	The designer has not provided sufficient evidence with their response. As cited above a clear demonstration of catchment areas and where urban creep must be included, is required on supporting drawings. Comment outstanding.			

factors have been applied.					
Overland Flood flow routes: Drawing 5655-76/D only indicates the post completion scenario. However, the existing survey needs to be shown in order to compare and appraise.	Please see drawing 5655-84_A Greenfield flows.	Drawing 5644:84 has been submitted and is acceptable. Comment closed.			
Groundwater - Uplift: Swale/pond section and peak groundwater freeboard annotation is accepted. As above as-built data is required to verify FFL's.	See as-built surveys. No swales are within the re-plan area of concern	The designer has not provide a response or further information to resolve this comment. Whilst as-built level extracts have been submitted, these must be reviewed via the verification process. Comment outstanding.			
Landscaping: 2 No RPS planting drawings provided only cover part of the site. Please provide full site wide coordinated drawings.	Taylor Wimpey to supply.	Information not supplied. Comment outstanding.			

Construction details: The swale mark-ups are not advised in full? Some details show topsoil placed directly above granular material, others show parts of gravel top may have other impervious fill sitting on top. Numerous other details for pipework, bedding, rodding points, catchpits, cellular soakaways, permeable paving are missing.	As built survey of swales	The designer has not provide a response or further information to resolve this comment. Whilst as-built level extracts have been submitted, these must be reviewed via the verification process. Comment outstanding.			
Microdrainage: Calculations based on FSR and Cv's of 0.75 and 0.84. Calculations must be based on FEH 2022. Without the correct as-built data it is not possible to conclude if this	It was agreed in the meeting that calculations with these CV values would be acceptable. Furthermore an additional set of calculations with FEH2013 would be acceptable for Arun to carry out a sensitivity check. Minor flooding also okay given these standards introduced after site was designed in 2017. See calculations attached	No revised calculations or summary provided, no qualification of UC and are tally. Comment outstanding.			

matches the design.					
The calculations are very difficult to review and your summary suggests that every permeable pavement has been installed to a different depth? Very difficult to verify as-built stone depths.	See above response.	No revised calculations or summary provided, no qualification of UC and are tally. Comment outstanding.			
OWC: It is understood that the OWC works are incomplete. Please ensure notification is given for final site inspections and further as-built evidence is provided thereafter.	MJA was instructed to send all information regarding OWC to Paul Cann.	Noted. ADC will review and confirm in due course. Comment closed.			
SuDS Management and Maintenance: A plan showing maintenance manual. Plans are included where appropriate showing how SuDS features	Swales are accessed via adjacent roads and footpaths. Driveways are accessed from the roads.	Noted. Comment closed.			

and watercourses are accessed for maintenance purposes.					
SuDS Management and Maintenance: The approved design drawings must be included in the document.	Included within Revision G of the SuDS Management and Maintenance Plan.	The engineering drawings are included, but not the planning approved plans. Comment outstanding.			
SuDS Management and Maintenance: The report must ensure there are clear details of who to contact if the system is not functioning correctly.	See updated Revision G of the SuDS Management and Maintenance Plan. (Page 5)	Report Rev G, page 5 now addresses this comment. Comment closed.			
SuDS Management and Maintenance: There is no action plan for dealing with accidental spillages of pollutants.	See updated Revision G of the SuDS Management and Maintenance Plan. (Page 4)	Report Rev G, page 4 now partially addresses this comment, however the EA would not be applicable for all eventualities; suggest this is tied with page 5 contact details Comment outstanding.			
SuDS Management and Maintenance: There is no advice provided as to what to do if	See updated Revision G of the SuDS Management and Maintenance Plan. (Page 5)	Report Rev G, page 5 now addresses this comment. Comment closed.			

alterations are to be made to the development or, works are carried out which may affect the surface water drainage system.					
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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.

From: Daun Johnson on behalf of Planning.Responses
Sent: 17 June 2026 09:20
To: Planning Scanning
Subject: FW: Planning Re-Consultation on: AL/54/24/DOC
Attachments: AL-54-24-DOC - Nyton Nursery.docx

Please upload attachment and email to AL/54/24/DOC, planning, consultee response, END

Daun Johnson
Technical Support Unit Assistant
Planning Services
T: 01903 737762 Ext 37762
E: Daun.Johnson@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: 16 June 2026 15:52
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; David Easton <David.Easton@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: AL/54/24/DOC

Please find enclosed our consultants response.

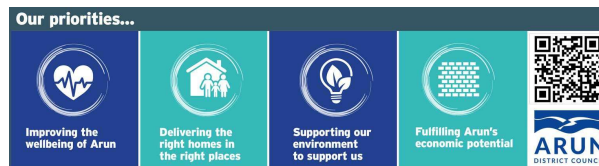
Condition 20 is recommended for discharge but the other conditions are not.

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



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 30 March 2026 10:33
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: AL/54/24/DOC

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: AL/54/24/DOC
Registered: 22nd May 2024

Site Address: Nyton Nursery Nyton Road Westergate PO20 3UQ
Grid Reference: 494106 105912
Category: Discharge of Condiiti
Description of Works: Approval of details reserved by condition imposed under reference AL/3/19/PL relating to conditions 18- as-built drawings of surface water drainage scheme, 19 - surface water drainage scheme, 20 - works to watercourses and 21 - maintenance and management of surface water drainage scheme.

I am able to inform you that I have received an amendment to the above application dated 27th March 2026 relating to: Additional spot levels plans and maintenance plan

If you should wish to make further representations as a result of this amendment, please make any further comment by **15th April 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

Mr D Easton

Planning Case Officer-Arun District Council

Telephone: 01903 737500 ex37361

Email: david.easton@arun.gov.uk

PLRECON_DOC (ODB) 2020