

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/132/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Daniel Vick	Date of Review:	10/12/2025
Site Name:	Former Bartons County Infants School Romney Broadwalk Bersted PO22 9BH		
Application Description:	Approval of details reserved by condition imposed under BE/40/22/PL relating to conditions 23-maintenance and management of SuDS drainage and 24-construction of surface water drainage system (see BE/133/25/DOC for discharge of condition 18-lighting design for biodiversity).		
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 23: Objection Condition 24: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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	Objection

Reviewed Plans

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

- SURFACE WATER DRAINAGE MAINTENANCE AND MANAGEMENT PLAN
- SURFACE WATER DRAINAGE VERIFICATION REPORT
- SURFACE WATER DRAINAGE STATEMENT
- SuDS INFORMATION PART 2

Condition wording

Condition 23 (maintenance and management of SuDS drainage) is worded as follows:

"The development hereby approved shall not be first occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the

development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity.

The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

I. a timetable for its implementation,

II. details of SuDS features and connecting drainage structures and maintenance requirement for each aspect

III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policy W SP1, W DM2 and W DM3 in Arun Local Plan."

Condition 24 (construction of surface water drainage system) is worded as follows:

"Upon completion of the surface water drainage system, including any SuDS features, and prior to the first occupation of the development; a survey and report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved pursuant to condition 1. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed, not increased and users remain safe for the lifetime of the development in accordance with NPPF and Policy W SP1, W DM2 and W DM3 in Arun Local Plan."

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

Application Reference: BE/132/25/DOC	Initial Issue Date: 10/12/2025
Site Name: Former Bartons County Infants School Romney Broadwalk Bersted	Issue Date: 10/12/2025
PO22 9BH	Reviewer Reference: ADC/EXT5/AF

Summary and Recommendation:

Condition 23: **Objection**

Condition 24: **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			
Date:	10/12/2025				
Condition Number: 23					
Comment Number					
1.	The MMP should include maintenance of the watercourses.				
2.	The MMP should include a plan which sets out maintenance ownership and responsibilities. Section 2.0 states ICOSA and WSCC Highways are responsible for the drainage system which implies there is no unadopted drainage infrastructure at the development.				
3.	The MMP should include key drainage product information and a proforma / checklist for inspections.				
4.	The flow control device / chamber should be				

	specifically included in the MMP.				
Condition Number: 24					
Comment Number					
1.	General note – the photographs provided are small and the information contained cannot be read.				
2.	The size/volume of modular storage installation and associated stone attenuation should be evidenced by survey / photograph and the impermeable liner should be evidenced.				
3.	The completed roadside swales should be evidenced.				
4.	The hydrobrake flow control device product cannot be confirmed from the photos provided.				
5.	No survey of the completed pipework and chambers is provided.				

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: Nicola Spencer on behalf of Planning.Responses
Sent: 12 December 2025 16:58
To: Planning Scanning
Subject: FW: Planning Consultation on: BE/132/25/DOC
Attachments: BE-132-25-DOC - Former Bartons County Infants school 1 FEL V1.docx

PL- Consultation- engineers response

Nicola Spencer
Technical Support Manager
Planning Services

T: 01903 737945
E: nicola.spencer@arun.gov.uk

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

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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: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 12 December 2025 14:36
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>
Cc: Daniel Vick <Daniel.Vick@arun.gov.uk>
Subject: RE: Planning Consultation on: BE/132/25/DOC

Hi Dan,

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

T: 01903 737815
E: sarah.burrow@arun.gov.uk

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



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Delivering the right homes in the right places

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 26 November 2025 08:48
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BE/132/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BE/132/25/DOC
Registered:	25th November 2025
Site Address:	Former Bartons County Infants School Romney Broadwalk Bersted PO22 9BH
Description of Works:	Approval of details reserved by condition imposed under BE/40/22/PL relating to conditions 23-maintenance and management of SuDS drainage and 24-construction of surface water drainage system (see BE/133/25/DOC for discharge of condition 18-lighting design for biodiversity).

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 **10th December 2025**.

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 D Vick

Planning Case Officer- Arun District Council

Telephone: 01903 737771

Email: Daniel.Vick@arun.gov.uk