

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/40/26/DOC	Reviewer Reference:	EXT/02
Planning Officer:	Simon Brooksbank	Date of Review:	09/07/2026
Site Name:	Chalcroft Nurseries Chalcraft Lane Bersted PO21 5TS		
Application Description:	Application under Section 73 for the variation of condition imposed under BE/81/20/OUT relating to condition 3 -approved plans and 18-access (conditions further amended by BE/77/25/NMA) BE/13/24/S73 Conditions(s) 22 - surface water drainage 23 - maintenance and management of surface water drainage		
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 22: Objection Condition 23: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No 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:

- SITE LAYOUT DRAINAGE AND LEVELS 101
- SITE LAYOUT SURFACE FINISHES 201
- CONSTRUCTION DETAILS SURFACE FINISHES 501
- CONSTRUCTION DETAILS DRAINAGE 502
- SURFACE WATER DRAINAGE DESIGN NOTE
- COVER LETTER

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 22:

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-

The following plans/documents should be listed as approved in respect to condition 23:

-
-

Condition wording

Condition 22 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 part of the development hereby approved 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 23 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. **The information that has been submitted is insufficient to demonstrate compliance with all 7 standards contained in the National Standards for SuDS.**

3. It is recommended that the applicant reviews the checklists provided on the Arun District Council website to ensure compliance.

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/40/26/DOC Site Name: Chalcroft Nurseries Chalcroft Lane Bersted PO21 5TS	Initial Issue Date: 09/07/26 Issue Date: 09/07/26 Reviewer Reference: EXT/02
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Summary and Recommendation:

Condition 22: **Objection**

Condition 23: **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:	09/07/26				
Condition Number: 22					
Comment Number					
1.	An assessment has not been submitted with regard to rainwater reuse (NSfS Standard 1)				
2.	Existing and future flood risk from any source has not been detailed (NSfS Standard 1- Runoff destination)				
3.	The connection to the watercourse appears to be outside of the redline boundary. It should be demonstrated that the applicant has the right install the proposed drainage in land outside of their control (NSfS Standard 1 - Runoff destination)				

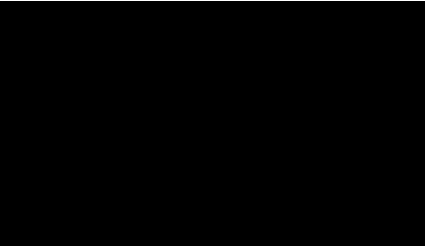
4.	No information has been provided in relation to NSfS Standard 2 - Interception				
5.	Whilst a surcharged outfall has been included in the calculation, it is based on modelling rather than observed depths. In instances where observed depths are not available, the surcharged outfall should be based on top of bank levels. (NSfS Standard 3 – Extreme rainfall)				
6.	An assessment of the proposed discharge volumes has not been included demonstrating that flood risk is not increased (NSfS Standard 3 – Extreme rainfall)				
7.	It has not been demonstrated that surface water flow from elsewhere will be safely conveyed around or through the site without compromising the SuDS system. It is noted from the Flood Maps for Planning that some surface water flood risk is shown which could be an overland flow route from Daffodil Avenue. (NSfS Standard 3 – Extreme rainfall)				

8.	No information has been provided in relation to NSfS Standard 5 - Amenity				
9.	No information has been provided in relation to NSfS Standard 6 - Biodiversity				
10.	Whilst some information has been provided in relation to NSfS Standard 7 relating to operation, maintenance, decommissioning and structural integrity, no construction details have been provided for the components of the drainage system.				
11.	The proposed headwall will require Arun byelaw consent. Please demonstrate that this is in place.				
12.	Submit the FEH point descriptor file to land.drainage@arun.gov.uk				
13.	Provide exceedance flow plan.				
Condition Number: 23					
Comment Number					
	This condition cannot be discharged until condition 22 is discharged, because the manual should include the approved drawings.				
	A draft version of the maintenance manual has				

	been submitted, the final version should be submitted				
	The report has a number of grammatical and spelling errors.				
	The implications of lack of maintenance should be included.				
	The maintenance operations should be specific to the development. Ensure that maintenance tasks are provided for all components included in the proposed drainage system and remove those that are not relevant				
	Maintenance actions for the existing watercourse should be provided.				
	Include the drainage drawings in the document, including a plan showing areas of responsibility and maintenance access.				
	Stipulate that a pre-handover inspection is required.				
	Include a checklist to facilitate consistent inspections.				
	Include a maintenance record proforma.				

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.

PL- Consultation- Engineers response



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>

Our priorities...



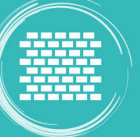
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 July 2026 11:35
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Brooksbank <Simon.Brooksbank@arun.gov.uk>
Subject: RE: Planning Consultation on: BE/40/26/DOC

Please find enclosed our consultants response, recommending that conditions 22 and 23 are not discharged.

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

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: 11 June 2026 10:03
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BE/40/26/DOC

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BE/40/26/DOC
Registered: 10th June 2026
Site Address: Chalcroft Nurseries Chalcraft Lane Bersted PO21 5TS
Description of Works: Application under Section 73 for the variation of condition imposed under BE/81/20/OUT relating to condition 3 -approved plans and 18-access (conditions further amended by BE/77/25/NMA) BE/13/24/S73 Conditions(s) 22 - surface water drainage 23 - maintenance and management of surface water drainage

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 **25th 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

Hebe Smith

Planning Case Officer- Arun District Council

Telephone: 01903 737626

Email: hebe.smith@arun.gov.uk