

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/105/25/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	12/01/2025
Site Name:	Cherry Tree Nursery Eastergate Lane Walberton BN18 0BA		
Application Description:	Removal of residential caravan and erection of 1 No. self build dwelling (resubmission of WA/52/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as a new dwelling.		
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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient	No objection subject to conditions
6. Biodiversity	Insufficient	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

- LOCATION PLAN DRAWING 1
- BLOCK PLAN DRAWING 2
- PROPOSED SITE PLAN DRAWING 3
- PROPOSED FLOOR PLANS, ELEVATIONS, ROOF PLAN 4
- DRAINAGE STRATEGY STATEMENT
- FRA
- FOUL AND SURFACE WATER DRAINAGE STRATEGY
- PHOTOS

Consultation comments to the planning officer

0. General

- 0.1. The development would alter drainage on and offsite and therefore requires sustainable drainage in accordance with NPPF requirements.
- 0.2. We note the previous application and our comments on WA/52/25/PL.

1. Runoff destination

- 1.1. The development should include an element of rainwater harvesting in accordance with the NSfS.
- 1.2. The ground investigation confirms shallow groundwater levels within 1m of the surface which preclude discharge to ground via soakaways. The proposed method of disposal of discharge to an ordinary watercourse is therefore acceptable.
- 1.3. The outlet drain appears to cross third party land and the applicant should provide evidence of legal ability to install the drain and discharge surface water to the watercourse.
- 1.4. Comments should also be obtained from the LLFA regarding any objection to connection to the culverted watercourse from any capacity or ordinary watercourse consenting concerns. This is important as our datasets indicate this infrastructure is classified as Highway Drain.
- 1.5. The runoff destination is not currently demonstrated to be feasible in accordance with the requirements of the NSfS (Standard 1). Therefore, we **object** to the application.

2. Interception drainage

- 2.1. Inception drainage is not considered in the submitted Drainage Statement.
- 2.2. The opportunities for interception drainage include lined permeable paving and green roofs or walls, or other method to be proposed by the applicant.
- 2.3. Evidence has not been provided to justify the lack of interception drainage provided as part of the sustainable drainage design. However, in recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.
- 2.4. Where infiltration is not viable, interception drainage may only be delivered by evapotranspiration which will involve planted SuDS features. This can be controlled by planning condition.

3. Extreme rainfall and flooding

- 3.1. The design flow restriction is based upon 0.5 litres per second which is a significant increase on the greenfield runoff rates for the drained area of 0.03 l/s. The NSfS states a multiple of 5 times GFR for the 50% AEP and 1% AEP storm should be considered the maximum for brownfield sites. The applicant should investigate restricting the peak runoff to 5 times GFR or as close as practicable using appropriate modern flow control devices and blockage protection for source control.
- 3.2. As the existing shared driveway may not drain satisfactorily and may therefore produce runoff which enters the drainage system, the area which would drain onto the drained area of the development site should be included within the calculations.
- 3.3. The flow control chamber currently appears to be within a root protection zone and whilst there is a note requiring hand digging within canopies, the location may not be feasible unless confirmed by an arboricultural assessment.
- 3.4. The exceedance flow paths do not appear to include the permeable paving and access road.
- 3.5. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS (Standard 3). Therefore, we **object** to the application.

4. Water quality

- 4.1. The proposed water quality mitigation provided by tanked permeable paving is acceptable.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.

- 5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.3. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of biodiversity benefits.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. An outline maintenance and operation plan has not been provided within the Drainage Statement. However, as the drainage system is private and within a single ownership, this aspect can be the subject of a planning condition.

8. Suggested conditions / Overcoming the objection

- 8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.
- 8.2. **The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**
- 8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

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

From: Elaine Walby on behalf of Planning.Responses
Sent: 13 January 2026 16:38
To: Planning Scanning
Subject: FW: Planning Consultation on: WA/105/25/PL
Attachments: WA-105-25-PL - Cherry Tree Nursery 1 FEL V1.docx

PL-Consultation- Engineer response

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

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

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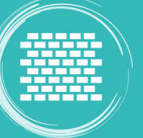
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 January 2026 13:33
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/105/25/PL

Please find enclosed our external consultants response, an objection.

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



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 22 December 2025 10:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: WA/105/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No:	WA/105/25/PL
Registered:	18th December 2025
Site Address:	Cherry Tree Nursery Eastergate Lane Walberton BN18 0BA
Grid Reference:	495769 106224
Description of Works:	Removal of residential caravan and erection of 1 No self build dwelling (resubmission of WA/52/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as a new dwelling.

The Council have received the above application.

[Click here to view the application and 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.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 23rd January 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-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.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

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

Yours sincerely

Kathryn Welch

Planning Officer- Arun District Council

Telephone: 01903 737789

Email: kathryn.welch@arun.gov.uk