Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/47/25/DOC	**Reviewer Reference:**	ADC/EXT2/D2134/79
Planning Officer:	Kathryn Welch	**Date of Review:**	04/12/2025
Site Name:	Land East of Tye Lane Walberton		
Application Description:	Approval of details reserved by condition imposed under reference WA/124/23/S73 relating to condition number **23(b) - implementation of the approved SuDS and condition number 25(b) - completed construction of the SuDS System.**		
Assessment Number:	2 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 23(B) implementation of the approved SuDS: **Objection** Condition 25(B) completed construction of the SuDS System.: **No objection**

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	**Objection**

Reviewed Plans

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

- SuDS Maintenance Schedule - Phase 1 (JL/183249-01C) (Part 1)
- SuDS Maintenance Schedule - Phase 1 (JL/183249-01C) (Part 2)
- SuDS Maintenance Schedule - Phase 1 (JL/183249-01C) (Part 3)
- Surface Water and SuDS Verification Report V.08
- Walberton Storm Water CCTV report

Condition wording

Condition 23(B) is worded as follows:

"catchment agreed under (a) and prior to occupation of any part of the development which that catchment serves, the developer/applicant shall provide the Local Planning Authority with asbuilt drawings of the fully 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. There shall be no deviation to the approved scheme other than with the written consent of the Local Planning Authority, the system shall be maintained in good working order in perpetuity. Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policy W DM3 of the Arun Council Local Plan."

Condition 25(B) is worded as follows:

"B) Upon completed construction of the SuDS System for each design catchment agreed under (a) and prior to occupation of any part of the development which that catchment serves, the owner or management company shall either provide the Local Planning Authority with an updated copy of the management manual incorporating any changes as a result of construction/implementation or confirm in writing that no changes are required to the manual. No further changes shall be made to the approved SuDS Maintenance & Management Plan/Regime including the management company responsible or the financial arrangements between the owners of the dwellings & the management company other than with the written consent of the Local Planning Authority, The owner or management company shall thereafter strictly adhere to and implement the recommendations contained within the manual to ensure that the system is maintained in perpetuity.' Reason: To ensure the efficient maintenance and on-going operation of the SuDS system and to ensure the best practice in line with guidance set out in 'The SuDS Manual' CIRIA publication ref: C753 Chapter 32, in accordance with Policy 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.

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: WA/47/25/DOC Site Name: Land East of Tye Lane Walberton	Initial Issue Date:04.12.2025 Issue Date: 04.12.2025 Reviewer Reference: ADC/EXT2/D2134/79

Summary and Recommendation:

Condition 23(B) (Phase 1 only): **Objection**
Condition 25(B) (Phase 1 only): **No 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	ADC Drainage Comments	Designers Response	ADC Drainage Comments	Designers Response
Date:	**Comment History**	**11/09/2025 [WA/47/25/DOC]**	**30/09/2025[WA/47/25/DOC]**		
Condition Number: 23b [SuDS Verification]					
Comment Number					
1.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** Firstly there is some uncertainty we are in receipt of all relevant information from the DOC application in pursuant of the drainage related conditions. It is requested that the applicant provide a supporting summary and full information by return. **ADC Drainage Comments**	Comment closed.			

	15.11.2024 [WA/78/24/DOC] A copy of the approved drawings has been supplied together with a phasing plan and maintenance schedule. Comment closed.				
2.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The verification report and supporting information does not meet the requirements of ADC verification guidance note (Surface water drainage | Arun District Council). **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** It shall be noted that ADC's initial comments to planning application WA/17/23/DOC were submitted, however the applicant has not provided a formal response, therefore as expected, most comment remain unresolved. Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]**	Comment closed.			

	As previously comment, ADC would expect a formal response to comments raised. Comment outstanding. **Designer Response 02/06/2025** This comment is addressed by the other comments below - the ADC verification guidance note was reviewed & the documents amended inline with this				
	Verification Report				
3.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** A maintenance section is included, however a bespoke maintenance report was previously prepared by the designer. Please review a one report should be presented to avoid confusion and/or conflicting information. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]**				

	A verification report has been supplied by Barter Hill dated March 2023 and shall be reference to for this review. Comment closed.				
4.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** A CCTV survey report has been provided but no video footage. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** No CCTV has been supplied for phase 1. Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** A CCTV has been provided, however there is no associated reference plan nor is there any findings or recommendations if there may be remedial works summarised. Some of the footage shows leaves and detritus to be cleared.	The query has not been answered sufficiently. Comment outstanding.	The CCTV Report by Baram's (14.01.2025) indicates no remedial works are necessary.	Comment closed.	

	Comment outstanding. **Designer Response 02/06/2025** Plan on phase 1 provided - same as plan included in appendix A. No remedial works required as this would be stated in the CCTV report.				
5.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The report should demonstrate that the author is suitably qualified/experienced and has suitable insurance; the latter is unconfirmed. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** Insurance detail are still missing. Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** The updated verification report has been supplied by Barter Hill dated July 2024	Comment closed.			

	and shall be reference to for this review. Insurance detail are still missing. Comment outstanding. **Designer Response 02/06/2025** Included in Appendix E				
6.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The report should confirm any differences between the drainage system as designed and as construction. It should demonstrate that any differences do not adversely affect the performance of the drainage system, including revised calculations if necessary. The report, whilst noted to be 'a live document' is nothing more than a few photos at this stage. . **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]**	Comment closed.			

	Whilst numerous photos have been provided the summary is missing. Comment outstanding **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Summary provided at the foot of each photo. Additional paragraph 5.8 provided.				
7.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The report should include dates and records of inspections undertaken by the report author. 3 Inspections are listed in 6.5 yet there is no summary of findings **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** 4 inspections are listed in 6.6, again without a summary of findings. Comment outstanding.	5.8 added. Comment closed.			

	ADC Drainage Comments 20.05.2025 [WA/78/24/DOC] Comment outstanding. **Designer Response 02/06/2025** See Above				
8.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The report should include an As Built survey to the requirements listed in ADC verification guidance note. It is recommended that the author reviews this list are arranges the revised report accordingly. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** Appendix D provides an as-built topographical survey however his only capture the swales and basins. No evidence has been provided to ascertain if the FFL's for plots, roads and how they compare to the SUDS permeable pavement	Comment closed.			

	and to ensure no increase in flood risk. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Additional as-bult information has been provided for the road and FFL's, however as commented above, the reviewing engineer does not appear to have summarised the findings. Comment outstanding.. **Designer Response 02/06/2025** FFL survey included within Appendix F				
9.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The report contains very limited evidence that all of the components of the drainage system as shown on the approved design drawings have been correctly installed, eg. Permeable paving, fin drains, catchpits, storm shark filter chamber. The only evidence is a single photograph of the cellular storage tank, part way	The report still lacks any commentary on 'As Built' survey, and details of any variations from approved design. This includes any discrepancies in ground levels and pipe/structure levels. For example as-built levels have been added in appendix F, yet now comment made. Comment outstanding.	The development has been constructed largely to the design. Minor updates described in 5.9-5.11	Other concerns have been raised in respect of undulations in the road have not been demonstrated to be part of the original design. Nor have they been mentioned in the verification report. Comment Outstanding.	This has been addressed by point 5.12 & explained by both the design engineer (Ardent) and independent engineer (Barter Hill) separately in emails that can be forwarded across that I had summarised to the planning officer previously

	through its construction, which does not provide sufficient evidence that the tank has been installed in accordance with the approved drawing. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** The verification report and supporting information does not meet the requirements of ADC verification guidance note (Surface water drainage | Arun District Council). Why is a maintenance included? Please review this guidance and provide a full compliant report and supporting evidence. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** ADC verification guidance note reviewed & report amended inline with this.				

	Maintenance section removed from verification report.				
10.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The purchase information for the all SUDS components is required. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comprehensive information has been provided for the permeable pavements, however the basin liners, flow controls and headwalls are missing. Comment outstanding. **Designer Response 02/06/2025** Additional info from Barams added to Appendix	Comment closed.			
11.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** Evidence of permeable pavement installations must	Where photographic evidence is missing, is there any data of materials ordered to justify depths to avoid intrusive checks?	Baram's have confirmed the following - we have used close to 1100tons of 20mm crushed aggregate beneath the permeable paving areas	No evidence has been provided to address this comment. Simply stating that material has been ordered/used is not	No photos were taken during construction and photos cannot be taken post install. The material amounts used have been

	be provided to verify depths, etc. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comprehensive information has been provided for the permeable pavements, however no information to validate as-built formation depths correlate with the approved design has been verified. Comment outstanding. **Designer Response 02/06/2025** Permeable paving installed to design & is functioning as designed	Comment outstanding.	along with approx.. 150tons of 2-6mm crushed stone (bedding for the block paving)	acceptable. Please provide material tickets and qualify pavement have been installed to design depths intended. Comment Outstanding.	stated in the comment prior and materials tickets confirming these amounts have been provided within appendix F. The paving has been installed as per design and to the designed depths. Barter Hill have provided photos in appendix C showing the paving is complete and have stated it is functioning as designed. Due to the design working well in practice intrusive checks will not be necessary.
12.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** As constructed floor levels should also be verified/considered to ensure no increase in flood risk.	Comment Closed			

	ADC Drainage Comments 15.11.2024 [WA/78/24/DOC] Comment outstanding.				
13.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** Page 24 photo evidence shows swale K/L to be incomplete.. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** The Barter Hill report includes numerous other photos which clearly show there are defects and issues that have not been flagged in the report. i.e. the main basin gabion barrier is incomplete on either sides where additional cages 'keyed in' will be required. Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding.	As above in item 9, the report contact does not demonstrate reviews have taken place. Merely stating its built to the drawings is not sufficient. Comment outstanding.	Swales K-L inspected and functioning on visits 09.07.2024 &16.07.2025.	Comment Closed	

	Designer Response 02/06/2025 Barter Hill have confirmed the scheme has been constructed in accordance with the drawings and fit for purpose				
14.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** Page 28 photo evidence shows headwall 1F detritus at the base. **ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** As above. Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** As per point 6	The query has not been answered sufficiently. Comment outstanding.	Refer to earlier photo of Headwall 1F in appendix C showing maintained swale.	Comment Closed.	
15.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The last 3 No pages are blank; is this intentional or is the report incomplete?	As above. Comment outstanding.	We have reviewed the guidance against the report – please confirm what doesn't meet the requirements?	Comment Closed.	

	ADC Drainage Comments 15.11.2024 [WA/78/24/DOC] The verification report and supporting information does not meet the requirements of ADC verification guidance note (Surface water drainage | Arun District Council). Comment outstanding. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Amended				
Condition Number: 25b [SuDS Maintenance and Management]					
Comment Number					
1.	**ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site]** The Ardent report is noted to cover only phase 1 of the development. Please see previous note above in item 3. **ADC Drainage Comments**	Comment closed.			

	15.11.2024 **[WA/78/24/DOC]** The maintenance report has been reviewed against the requirements of ADC checklist PCENGD4. The applicant is advised to review this to ensure the revised submission includes all items over and the above the comments raised below. **Designer Response 02/06/2025** Checklist was completed & submitted previously				
2.	**ADC Drainage Comments 15.11.2024** **[WA/78/24/DOC]** The maintenance manual must include all approved plans of the surface water drainage. **ADC Drainage Comments 20.05.2025** **[WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Added	Comment closed.			
3.	**ADC Drainage Comments**	Comment closed.			

	15.11.2024 **[WA/78/24/DOC]** A plan showing maintenance responsibility must be included. **ADC Drainage Comments 20.05.2025** **[WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Estate plan was included however as per comments 24/02/2024 this was amended to make it purely focused on SUDs. Conveyance plan added to pick up this comment.				
4.	**ADC Drainage Comments 15.11.2024** **[WA/78/24/DOC]** A maintenance record pro-forma must be provided. **ADC Drainage Comments 20.05.2025** **[WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Please see appendix D	Comment closed.			

5.	**ADC Drainage Comments 15.11.2024 [WA/78/24/DOC]** There is no action plan for dealing with accidental spillages of pollutants. **ADC Drainage Comments 20.05.2025 [WA/78/24/DOC]** Comment outstanding. **Designer Response 02/06/2025** Please see Proposed Action Plan section on page 8 & appendix G	Comment closed.			

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.

[redacted]

WA/47/25/DOC

PL- consultation- drainage response

[redacted]

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

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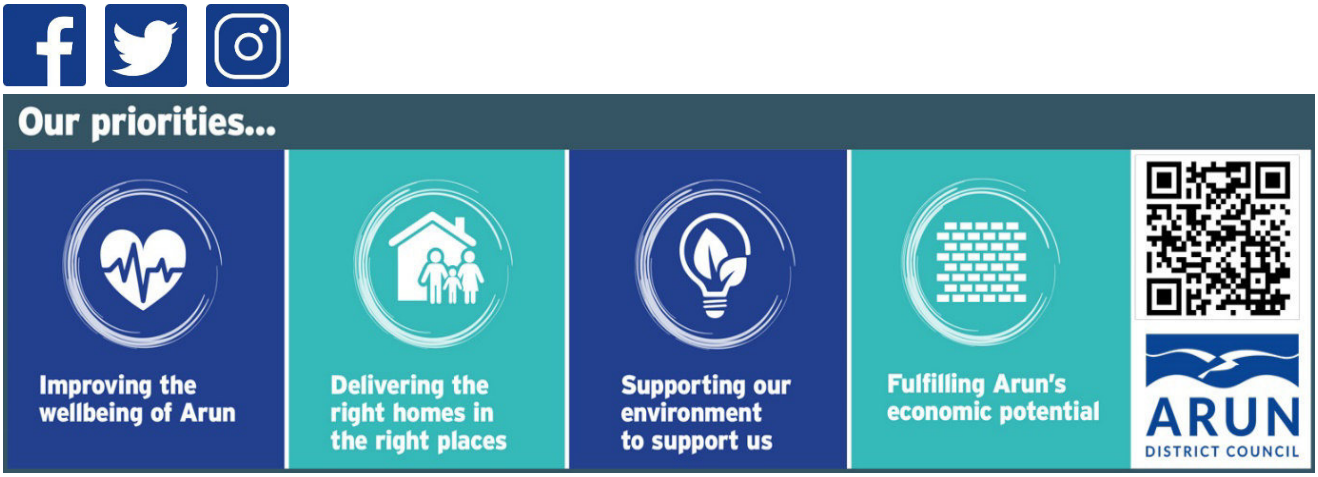

From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 08 December 2025 10:08
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Kathryn Welch <Kathryn.Welch@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: WA/47/25/DOC

Hi Kathryn,

Find the consultation – an objection to condition 23b, and no objection to condition 25b – 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
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[redacted]

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 17 October 2025 13:01
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: WA/47/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	**WA/47/25/DOC**
Registered:	18th June 2025
Site Address:	Land East of Tye Lane Walberton
Grid Reference:	497080 106816
Category:	Discharge of Conditi

Description of Works: Approval of details reserved by condition imposed under reference WA/124/23/S73 relating to condition number 23(b) - implementation of the approved SuDS and condition number 25(b) - completed construction of the SuDS System.

I am able to inform you that I have received an amendment to the above application dated 17th October 2025 relating to: Substitute Surface water and SUDS report, CCTV report

If you should wish to make further representations as a result of this amendment, please make any further comment by **31st October 2025.**

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

Kathryn Welch

Planning Case Officer-Arun District Council

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