

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/106/24/DOC	Reviewer Reference:	ADC/EXT2/D2134/68
Planning Officer:	Kathryn Welch	Date of Review:	13.11.2025
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) - SuDS System , and condition number 25(b) - SuDS Maintenance Manual.		
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): Further information required
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
2. Interception drainage	N/A	No objection subject to conditions
3. Extreme Rainfall and Flooding	N/A	No objection subject to conditions
4. Water Quality	N/A	No objection subject to conditions
5. Amenity	N/A	No objection subject to conditions
6. Biodiversity	N/A	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	N/A	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:

- MAIN DRAINAGE CONSTRUCTION DETAILS (SHEET 2 OF 3) LHS240-1222 REV C1
- 183249-02A SuDS Maintenance Schedule - Phase 2 - Part 1 of 2
- PCENG4 Checklist - surface water drainage maintenance and management checklist
- 183249-01C SuDS Maintenance Schedule - Phase 1
- 183249-02B SuDS Maintenance Schedule - Phase 2
- Surface water drainage and SuDS verification report V.07 September 2025
- SUDS Maintenance Schedule Phase 2 JL/183249-02B
- Drainage report – infrastructure

Condition wording

Condition 23 B is worded as follows:

A) Prior to occupation, submit a plan to the Local Planning Authority to agree in writing the design catchment areas relating to the SuDS scheme.

B) Immediately following implementation of the approved SuDS scheme for each design 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 as-built 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."

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

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Application Reference: WA/106/24/DOC Site Name: Land East of Tye Lane Walberton	Initial Issue Date: 13/11/2025 Issue Date: 13/11/2025 Reviewer Reference: ADC/EXT2/D2134/68
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Summary and Recommendation:

Condition 23 (B): **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	ADC Drainage Comments	Designer Comments	ADC Drainage Comments	
Date:	Previous Comments	08/08/2025	18/08/2025	13/11/2025	
Condition Number: 23 (B) SuDS System					
Comment Number					
1.	Initial/General				
2.	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.				

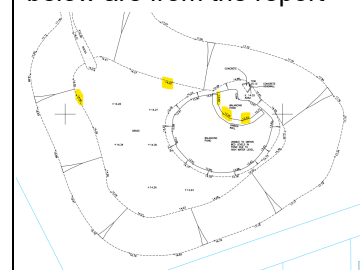
	ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] A copy of the approved drawings has been supplied together with a phasing plan and maintenance schedule. Comment closed.				
	ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site] The verification report and supporting information does not meet the requirements of ADC verification guidance note (Surface water drainage Arun District Council). ADC Drainage Comments 24/02/2025 [WA/106/24/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. Designer Comments 1/04/2025 [WA/106/24/DOC]	Noted. Comment closed.			

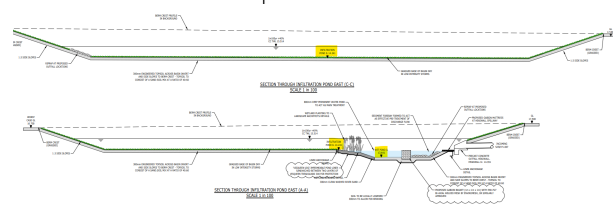
	ADC Guidance note has been issued to consultant & from reviewing against report anything missing as per guidance is picked up by below comments.				
	Verification Report				
	ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site] A maintenance section is included, however a bespoke maintenance report was previously prepared by the designer. Please review a one report should be presented to avoid confusion and/or conflicting information. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] A verification report has been supplied by Barter Hill dated March 2023 and shall be reference to for this review. This appears to cover the entire site. The content page does not correlate with the report content however. Comment outstanding	Noted. Comment closed.			

	Designer Comments 1/04/2025 [WA/106/24/DOC] Section was removed previously & heading has now been removed from contents page.				
	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 24/02/2025 [WA/106/24/DOC] No CCTV has been supplied for phase 2. Comment outstanding. Designer Comments 1/04/2025 [WA/106/24/DOC] Footage for Phase 2 has been corrupted - Baram's are redoing the CCTV survey.	Noted. Comment outstanding		An updated CCTV has been provided, however there is no further summary advised. Whilst there do not appear to be any defects on reviewing the footage, the verification engineer must provide comment to confirm this has been reviewed. Comment outstanding.	Barter Hill have added point 5.10 to reflect that no defects have been identified by the CCTV survey
	ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site] The report should demonstrate that the author is suitably qualified/experienced and	Noted. Comment closed.			

	has suitable insurance; the latter is unconfirmed. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] Insurance detail are still missing. Comment outstanding Designer Comments 1/04/2025 [WA/106/24/DOC] Details added to appendix E.				
	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.	Noted. Comment closed.			

	ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] Whilst numerous photos have been provided the summary is missing. There do not appear to be any photos and/or construction record details for the phase 2 basin. Comment outstanding. Designer Comments 1/04/2025 [WA/106/24/DOC] Description added to photos				
	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 24/02/2025 [WA/106/24/DOC] 4 inspections are listed in 5.7, again without a summary of finding. These however only refer to phase 1 so it is assumed now	Noted. Comment closed.			

	inspections have been completed for phase 2. Comment outstanding Designer Comments 1/04/2025 [WA/106/24/DOC] Added to section 5.7.				
	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 and arranges the revised report accordingly. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] Appendix D provides an as-built topographical survey however this only captures the swales and basins for phase 1. Comprehensive evidence for phase 2 is required. Evidence must be provided to ascertain if the FFL's for plots, roads and how they compare to the SUDS permeable pavement and to	Noted. The west basin design base was 12.01m and the as-built shows this to be 12.36-11.73m which matches or is deeper thus is accepted. The east basin design base however was 13.7m and the as-built shows this to be 14.25-14.49m therefore or not in accordance with the approved design and may provide insufficient storage. Please advise. Comment outstanding.	The As Built levels do reflect the basin design, please refer to cross section for the eastern basin in appendix B MAIN DRAINAGE CONSTRUCTION DETAILS (SHEET 3 OF 3)	The east basin as built shows slight variations in the overall footprint and base levels. The verification engineer must appraise the variations and if necessary show an overlay comparison. As previously noted are there any impacts to the storage? Comment outstanding.	Confirmation from Barter Hill in point 5.7 that phase 2 has been constructed in accordance with the approved drawings and is fit for purpose. The as built levels of the east basin provided by MK Surveys mirror the cross sections produced by Ardent. The majority of this basin is not designed to 13.7m as stated in comment, only the lowest section of basin which is how it has been constructed. Both snips below are from the report – 

	ensure no increase in flood risk. Designer Comments 1/04/2025 [WA/106/24/DOC] Added to appendix F.			
	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 through its construction, which does not provide sufficient evidence that the tank has been installed in accordance with the approved drawing. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] The verification report and supporting information does not meet the requirements of ADC verification guidance	Noted. Comment closed		

	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. Designer Comments 1/04/2025 [WA/106/24/DOC] As per comment 2 above.				
	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 24/02/2025 [WA/106/24/DOC] Comment outstanding. Designer Comments 1/04/2025 [WA/106/24/DOC] Added to section 5.8 & appendix F	Noted. Comment closed.			
	ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site] Evidence of permeable pavement installations must	Noted. Comment closed.			

	be provided to verify depths, etc. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] Comment outstanding. Designer Comments 1/04/2025 [WA/106/24/DOC] As per appendix F				
	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. ADC Drainage Comments 24/02/2025 [WA/106/24/DOC] Comment outstanding. Designer Comments 1/04/2025 [WA/106/24/DOC] As per appendix F	Noted. Comment closed.			
	ADC Drainage Comments 03.08.2023 [WA/17/23/DOC – Full Site] Page 24 photo evidence shows swale K/L to be incomplete.	Noted. Comment closed.			