

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/76/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	14/09/2026
Site Name:	North Choller Farm Barnham Lane Walberton BN18 0AX		
Application Description:	Demolition of existing modern agricultural buildings and water tank. Conversion, extension and alteration of traditional vernacular agricultural buildings to create 3 No. new dwellings and construction of 3 No. new dwellings and associated outbuildings to form a total of 6 No. dwellings. Repair and re-pointing of existing flint walls, landscaping, SuDs ponds and parking provision. This application may affect the setting of a listed building and is a Departure from the Development Plan. Is in CIL Zone 3 and is CIL liable as new dwellings.		
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 (Chapter 18). 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further Information
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection subject to conditions
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	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 Dwg no. 2506CH_000
- Flood Risk Assessment, Surface Water Drainage Strategy and Foul Water Drainage Strategy and Lidsey Drainage Impact Assessment

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

Consultation comments to the planning officer

0. General

- 0.1. The application is for non-major development which affects drainage on and around the site and therefore requires sustainable drainage in accordance with Section F8 of the NPPF.
- 0.2. The application is supported by a combined Flood Risk Assessment [FRA] and Drainage Strategy report.
- 0.3. The site is Flood Zone 1 for rivers and seas but is at high risk of flooding from surface water.
- 0.4. A site specific flood modelling exercise is referenced in the submitted Flood Risk Assessment but is a separate report not submitted with the application documents. We are therefore currently not able to review this assessment and cannot confirm that the findings are representative. The Pluvial Modelling report should be submitted for review.
- 0.5. We are unable to advise from the information currently provided whether the development proposals release the applicant from Sequential Testing requirements under Section F5 of the NPPF.

1. Runoff destination

- 1.1. Water butts are noted in the FRA report and can be specified and included on the drainage layouts at technical design stage.
- 1.2. The report notes Ground investigation indicates shallow ground water which would preclude an infiltration solution. The ground investigation report should be submitted for review.
- 1.3. The proposed discharge to a watercourse would be acceptable in principle where infiltration is not viable. However, the receiving watercourse is outside of the area of topographic survey and evidence needs to be provided that the connection is feasible and that downstream connectivity exists to the wider land drainage network.
- 1.4. Further information should be provided to evidence that the runoff destination is in accordance with the requirements of the NSfS.

2. Interception drainage

- 2.1. The assessment of interception drainage is incorrect in terms of assuming the entire storage volume within evapotranspiration elements can be used for interception. Guidance is provided within the NSfS and the SuDS Manual. A revised assessment and confirmation of plan areas of interception drainage elements should be provided.
- 2.2. Inception drainage is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. Greenfield runoff calculations indicate an average storm peak flow of 1.4 litres per second. However, the designer has selected 5 litres per second as a design peak flow rate. The relaxation factor noted in NSfS para 3.21 is applicable when it is demonstrated that greenfield runoff cannot be achieved. No evidence is provided to demonstrate the greenfield runoff rate cannot be achieved and there does not appear to be a site constraint which would affect the ability to design to greenfield runoff rate. The design peak flow rate should be revised.
- 3.2. The following information should be provided to enable audit of the model; a catchment areas plan, the model schematic, pipe/node references on the drainage layout plan, levels information on the drainage layout plan (CL IL, storage base and top, key external finished levels).
- 3.3. The receiving watercourse base and outlet IL should be confirmed and the proposed surcharge level should be checked in relation to the pluvial flood risk output.

- 3.4. The sustainable drainage system and attenuation is within an area of surface water flood risk and would potentially be affected and diminished by surface water / rainfall falling outside of the drained area. We are not able to review the Pluvial Flood Model (not submitted) but evidence should be provided that the system would not be affected by surface water inflow.
- 3.5. Exceedance paths should be shown on the drainage layout or a separate plan with sufficient finished levels information to demonstrate the strategy.
- 3.6. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. Water quality mitigation is provided by permeable paving and the proposed planters. Some additional measures to control silt and detritus may need to be incorporated and this can be achieved through detailed design.

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. The site includes permeable paving and small scale SuDS planters, which provide a limited provision of amenity. An assessment of the opportunities and provision of amenity value through the drainage system should be provided.

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. There is no site-specific biodiversity risk and opportunity (BRO) assessment provided. The submitted ecology report does not include sustainable drainage. Arun DC guidance is provided here, <https://www.arun.gov.uk/standard-6-biodiversity>
- 6.4. Biodiversity is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

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

- 7.1. There are no concerns regarding the construction, operation, decommissioning and structural integrity.
- 7.2. An outline maintenance plan is included in the FRA report. A detailed management and maintenance plan which is a standalone document can be provided at discharge of condition stage.

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

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 21 September 2026 17:17
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/76/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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: 27 August 2026 09:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: WA/76/26/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/76/26/PL**

Registered: 24th August 2026
Site Address: North Choller Farm Barnham Lane Walberton BN18 0AX
Grid Reference: 495828 105596
Description of Works: Demolition of existing modern agricultural buildings and water tank. Conversion, extension and alteration of traditional vernacular agricultural buildings to create 3 No. new dwellings and construction of 3 No. new dwellings and associated outbuildings to form a total of 6 No. dwellings. Repair and re-pointing of existing flint walls, landscaping, SuDs ponds and parking provision. This application may affect the setting of a listed building and is a Departure from the Development Plan. Is in CIL Zone 3 and is CIL liable as new dwellings.

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 1st October 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

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