

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/105/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hannah Kersley	Date of Review:	05/03/2026
Site Name:	Woodgate Centre Oak Tree Lane Woodgate PO20 3GU		
Application Description:	Approval of details reserved by condition imposed under AL/107/21/PL relating to conditions 15-foul drainage, 17-surface water drainage scheme, 18-maintenance and management of surface water system and 21-discharge of flows (please see AL/106/25/DOC for the discharge of conditions 13-waste storage, 14-archaeological works, 28-remediation strategy, 32-hard and soft landscape, 34-protection of existing trees/bushes/hedges, 40-decentralised and renewable energy or low carbon sources, 42-Employment and Skills Plan and 43-location of fire hydrants).		
Assessment Number:	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 17: Objection Condition 18: Objection Condition 21: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	N/A – Determined at Full Planning Stage	No objection
6. Biodiversity	N/A – Determined at Full Planning Stage	No 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:

- AAL456-AAL-XX-XX-DR-D-5100-DRAINAGE_GENERAL ARRANGEMENT-P02
- AAL456-AAL-XX-XX-DR-D-5101-DRAINAGE, uploaded in 5 different parts via the public planning portal
- AAL456-AAL-XX-XX-DR-D-5106-DRAINAGE_CATCHMENT PLAN-P02
- AAL456-AAL-XX-XX-DR-D-5107-DRAINAGE_OVERLAND FLOW ROUTE PLAN-P02
- AAL456-AAL-XX-XX-DR-D-5110-SURFACE WATER MANHOLE SCHEDULE, uploaded in 3 different parts via the public planning portal
- AAL456-AAL-XX-XX-DR-D-5113-FOUL WATER MANHOLE SCHEDULE_SHEET, uploaded in 3 different parts via the public planning portal

- AAL456-AAL-XX-XX-DR-D-5120-SURFACE WATER LONGITUDINAL SECTIONS, uploaded in 8 parts via the public planning portal
- AAL456-AAL-XX-XX-DR-D-5550-DRAINAGE DETAILS, uploaded in 4 parts via the public planning portal
- AAL456-AAL-XX-XX-DR-D-5199-DRAINAGE NOTES-P01
- AAL456-AAL-XX-XX-DR-D-5128-SURFACE WATER LONGITUDINAL SECTIONS_SHEET 9-P01
- 1 FEL V2 AAL Responses
- Drainage Technical Note
- K480070-LVL-XX-XX-W-1000 ManCo Site Plan Rev A
- EMAIL Acceptable Foul Drainage correspondence
- Drainage Maintenance Plan
- Surface Water Calculations

Condition wording

Condition 17 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 building 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 18 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.”

Condition 21 is worded as follows:

“The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a

watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

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. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing"

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. We have no Comments on Conditions 13, 14, 28, 32, 34, 40, 42 and 43, which do not require drainage design.
3. We have reviewed surface water drainage only. We have not reviewed the foul water drainage design.

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: AL/105/25/DOC Site Name: Woodgate Centre Oak Tree Lane Woodgate PO20 3GU	Initial Issue Date: 28/11/2025 Issue Date: 05/03/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 17: Surface Water Drainage scheme - Objection
Condition 18: Maintenance and Management of Surface water system - Objection
Condition 21: Discharge of flows - 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	Designer Response	ADC Drainage Comments		
Date:	28/11/2025	16/02/2026	05/03/2026		
Condition Number: 17 - Surface Water Drainage Scheme					
Comment Number					
1.	Greenfield runoff calculations are not included in the Drainage Technical Note. The design peak outflows must be confirmed based upon the drained area and site specific FEH greenfield runoff data.	Please refer to the new accompanying document, extracted from planning application AL/107/21/PL, which contains correspondence between Charles & Associates and ADC. This suggests a Qbar of 10.7l/s using ICP SuDS based on the areas positively drained (2.30ha), a Soil Index of 0.4 (Soil Class 3) and Hydrological Region 7. As per the correspondence from French Engineering on 12/02/2026, we have proceeded with the retention	Peak Flow rate accepted, comment closed.		

		of the per hectare rate established at the planning stage and applied the detailed design contributing area to this value, which equates to 13.2l/s for a drained area of 2.84ha.			
2.	The catchment plan shows a total drained area of 2.84ha whereas the calculations include 2.69ha. The entire drained area should be included in the calculations.	The hydraulic software does not currently support assigning of additional area (urban creep) to specific contributing catchments. As such, two hydraulic models have been created to cater for both scenarios: Model 1 (Woodgate – Storm (0% UC) – The PIMP is assigned as per the true value of a contributing catchment. This model provides simulation results for the 1:1YR, 1:10YR and 1:30YR+40%CC storm events. Total contributing area = 2.84ha. Model 2 (Woodgate – Storm (10% UC) – The PIMP for contributing areas not subject to urban creep (all but roof areas) have been prorated down to 91% such that applying an overall additional area brings the PIMP up to (and slightly above) their true value in the	The drained areas, UC allowance and method of applying UC are acceptable. However, the with UC calculations show flooding at Node 52 which is not highlighted as an intended above ground storage location. The design should remove this flooding, or, demonstrate the flooded volume will not leave the site and assess the hazard to site users as intentional temporary ponding in a suitable location.		

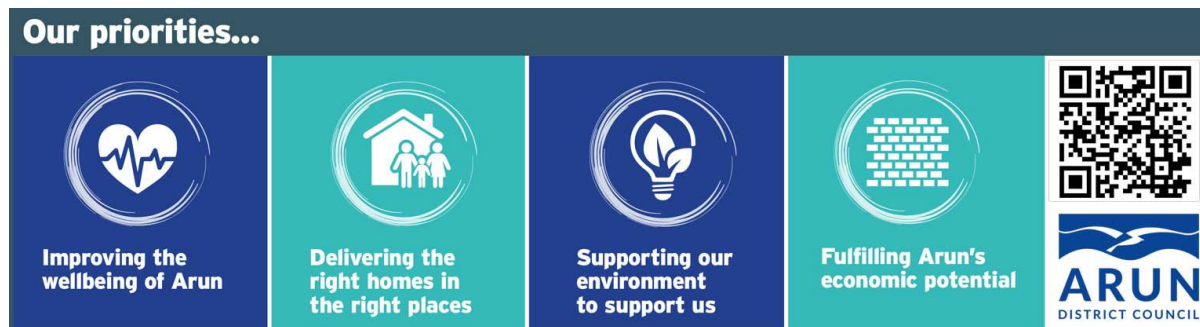
		resulting output. This model provides simulation results for the 1:100YR+45%CC+10%UC storm events. Total contributing area = 2.684ha. 2.684ha +10%UC = 2.952ha.			
3.	The half drain times for the storage features is not shown on the calculations for the design storm. Please clarify in the report.	The models have been run with the half empty setting at 4320 minutes to establish the results for each attenuation feature. The results are detailed in the updated hydraulic calculation exports.	Half drain times are acceptable, comment closed.		
4.	The flow control chamber is downstream of an open water feature. Noting the trash screens on the inlet and outlet, there remains a blockage risk to the flow control device. Additional measures to reduce risk and mitigate the impact of blockage should be incorporated. Please demonstrate that this risk has been adequately assessed and accounted for by the design and the management plan for the SuDS.	To provide additional mitigation measures to reduce the impact of blockage, a high level overflow within the chamber upstream of the watercourse realignment has been added to allow flow to continue should a partial blockage occur. High level overflows have also been specified where orifice plate sizes are less than 50mm diameter. Maintenance of this (and other) flow control chambers has been added to the MMP.	As a technical design, the note on the drainage layout plan is not sufficient. The level and size of the overflows should be shown on the plans and reflected on the construction details.		
5.	Permeable paving attenuation should not be positioned within utility	Noted – permeable paving and attenuation crates have been adjusted so that they	Comment closed.		

	services margins as the excavation of this infrastructure will damage the attenuation and may not be reinstated effectively. Similarly, the attenuation tanks within utility service margins would need to have sufficient cover for a standard NJUG arrangement without risking damage to the attenuation.	are not specified within the indicative utility services margins.			
6.	Evidence should be provided that the attenuation storage can be positioned within the exiting sewer easements.	Please refer to the accompanying document, extracted from planning application AL/107/21/PL, where Southern Water states that attenuation storage should not be located within 5m of existing sewers. The drainage strategy has been revised to satisfy this requirement.	Comment closed.		
7.	There are instances of adoptable foul water drainage beneath permeable paving SuDS storage and adjacent to crate storage. This may not be acceptable to the adopting asset owner and may reduce the area available for attenuation storage. Please confirm by providing comments or evidence of acceptance of	The drainage strategy has been revised such that the permeable paving has been removed from main carriageway extents so that no adoptable drainage is beneath permeable paving. The permeable paving has instead been specified on driveways/private land only. The NAV adopting the drainage (IWNL) have confirmed no issues with	Comment closed.		

	the design by the adopting asset owner.	adoptable runs next to attenuation crate storage so long as 300mm separation is maintained, although 1m of separation has been applied where possible, which the drainage strategy has been revised in accordance with. Refer to the accompanying document for IWNL correspondence.			
Condition Number: 18 - Maintenance and Management of Surface Water System					
Comment Number					
1.	The MMP states that the residents are responsible for funding the maintenance of the drainage system and may set up a company to appoint a drainage contractor. This is not sufficient clarity for discharge of conditions stage. There should be a clear plan with ownership, responsibilities / roles and processes established. In our view, in order to ensure maintenance responsibilities are actioned, there should be a management company set up by the developer and owned / run by the estate owner or passed to the residents or other landowner as part of transferring the freehold of the land.	The MMP has been updated to provide further clarity on the responsibilities on the maintenance of the drainage system. Please refer to drawing K480070-LVL-XX-XX-W-1000-ManCo Site Plan_RevA, which highlights the extent of drainage maintenance covered by the management company.	The Issue A (12.02.2023) Maintenance Plan written content is generally acceptable. Checklist critical item: The MMP must include all approved plans. The plan should be a stand lone document and include the approved drainage plans and the ManCo Site Plan. It is anticipated that the next revision of the drainage and details plans will be approved.		

Condition Number: 21 - Discharge of Flows					
Comment Number					
1.	We note there is no objection from the Lead Local Flood Authority and we have no specific comments on the watercourse alteration design. However, the design for the surface water drainage system should be approved prior to discharging this condition.	Noted – refer to responses provided for the comments on Condition 17 and 18.	Approval of C17 awaited.		
2.	Note – Ordinary Watercourse Consent (Land Drainage Act) will be required from the County Council as Land Drainage Authority prior to physical alteration to existing ordinary watercourses.	OWC to be obtained prior to commencement of works.	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.



From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 24 February 2026 11:19

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Re-Consultation on: AL/105/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	AL/105/25/DOC
Registered:	20th October 2025
Site Address:	Woodgate Centre Oak Tree Lane Woodgate PO20 3GU
Grid Reference:	494134 104173
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition imposed under AL/107/21/PL relating to conditions 15-foul drainage, 17-surface water drainage scheme, 18-maintenance and management of surface water system and 21-discharge of flows (please see AL/106/25/DOC for the discharge of conditions 13-waste storage, 14-archaeological works, 28-remediation strategy, 32-hard and soft landscape, 34-protection of existing trees/bushes/hedges, 40-decentralised and renewable energy or low carbon sources, 42-Employment and Skills Plan and 43-location of fire hydrants).

I am able to inform you that I have received an amendment to the above application dated 16th February 2026 relating to: Substitute drainage plans

If you should wish to make further representations as a result of this amendment, please make any further comment by **10th March 2026**.

[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

Hannah Kersley

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