

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/118/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Daun Johnson	Date of Review:	4/12/2025
Site Name:	Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH		
Application Description:	Approval of details reserved by condition imposed under AL/127/24/PL (APP/C3810/W/25/3358593) relating to condition 4-surface water drainage (see AL/118/25/DOC for discharge of conditions 3-Construction Environmental Management Plan, 7-Biodiversity Enhancement Plan, 10-Natural England licence and statement and 12-lighting)		
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	Condition 4: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Insufficient	Objection
2. Interception drainage	Insufficient	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	Compliant	No objection

Reviewed Plans

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

- CONSTRUCTION ENVIRONMENTAL MANAGMEENT PLAN
- DRAIANGE APPENDICIES
- ENGINEERING GA-BELOW GROUND DRAINAGE 2025-C109-001
- PROPOSED SOFT LANDSCAPE

Condition wording

Condition 4 is worded as follows:

"Prior to the commencement of development, full details of the proposed surface water drainage scheme shall be submitted to and approved in writing by the Local Planning Authority. This shall include:

- Winter groundwater monitoring;*
- Winter infiltration testing in accordance with BRE DG 365 or similar;*
- Details of the proposed method and location of surface water disposal in accordance with the SUDS Hierarchy;*
- An impermeable area plan;*
- Calculations modelling for the surface water drainage network for the following storm events: 100% Annual Exceedance Probability (AEP); 10% AEP plus climate change allowance; 3.3% AEP plus climate change allowance, and; 1% AEP plus climate change allowance. All storm events must include an allowance for urban creep and surcharged outfalls where appropriate.*
- Detailed drainage plans; - Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms, and;*
- Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SUDS scheme.*

The development shall be carried out only in accordance with the approved plans. The surface water drainage system shall remain for the lifetime of the development."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Please note the Drainage Statement report is not submitted / available on the planning file, only the appendices.
3. The Appeal condition wording requires infiltration testing and groundwater monitoring.

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/118/25/DOC Site Name: Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH	Initial Issue Date: 4/12/2025 Issue Date: 4/12/2025 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 4: **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	Designer Response			
Date:	4/12/2025				
Condition Number: 4					
Comment Number					
1	The planning condition requires winter infiltration testing. None is submitted.				
2	The planning condition requires winter ground water monitoring. None is submitted. It must be evidenced that 1m unsaturated ground is provided between peak groundwater levels and the base of any infiltration feature.				
3	The design does not include provision of Interception Drainage in accordance with the National SuDS Standards.				
4	The planning condition requires an updated				

	impermeable areas plan. None is submitted. This should include a summary and total including urban creep allowance.				
5	The proposed design peak outflow rates are arbitrary and not restricted to greenfield runoff rates in accordance with the National SuDS Standards. Design flow restriction should be based upon greenfield runoff equivalent for the drained area and if necessary a relaxation applied where constraints preclude meeting the GFR rate. Modern flow controls can achieve rates much lower than 1l/s.				
6	The detailed drainage layout plans does not include finished surface levels. The base level of the permeable pavement storage should also be shown.				
7	The planning condition requires proof of consents for any discharge to watercourse. None are submitted. Ordinary Watercourse Consent is required for both outlets and the culverted section of exiting watercourse and				

	'watercourse corridor improvements' from WSCC.				
8	Construction details should be provided for all drainage elements.				
9	A surcharged outfall should be used in the drainage model for both outfalls and the design level justified.				
10	The permeable paving and flow control should be included in the drainage model.				
11	The watercourse connection to the rear appears to be outside the planning red line boundary. Confirmation of land ownership or Easement for construction and maintenance access is required together with proof of legal right to discharge to the watercourse if not the Riparian Proprietor.				

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.

AL/118/25/DOC

PL- consultation- drainage response

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

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<https://www1.arun.gov.uk/planning-application-finder>



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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	 
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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 08 December 2025 10:46

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

Cc: Daun Johnson <Daun.Johnson@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>

Subject: RE: Planning Consultation on: AL/118/25/DOC

Hi Daun

Find the consultation – an objection – attached.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

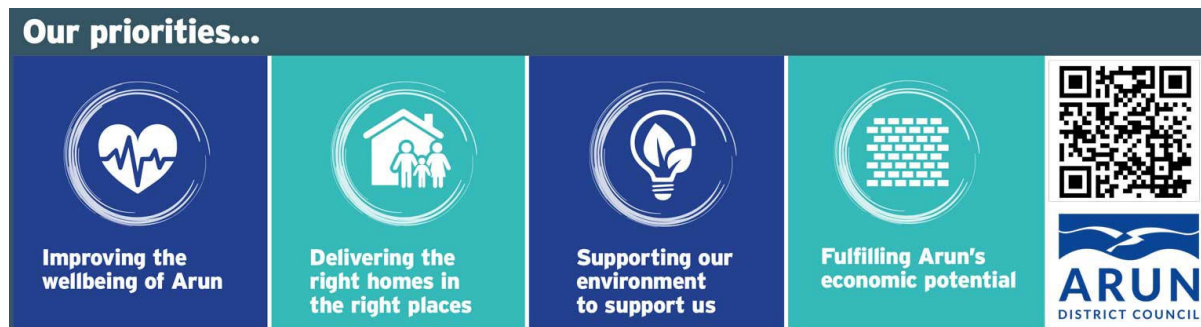
Kind regards

Sarah Burrow
Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737815

E: sarah.burrow@arun.gov.uk

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 20 November 2025 08:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: AL/118/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	AL/118/25/DOC
Registered:	19th November 2025
Site Address:	Land to the North of The Haven and East of Northfields Lane Westergate PO22 3UH
Description of Works:	Approval of details reserved by condition imposed under AL/127/24/PL (APP/C3810/W/25/3358593) relating to condition 4-surface water drainage (see AL/118/25/DOC for discharge of conditions 3-Construction Environmental

Management Plan, 7-Biodiversity Enhancement Plan, 10-Natural England licence and statement and 12-lighting).

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **4th December 2025**.

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.

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

Yours sincerely

Mrs D Johnson

Planning Case Officer- Arun District Council

Telephone: 01903 737762

Email: daun.johnson@arun.gov.uk