

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/4/26/DOC	Reviewer Reference:	ADC/EXT2/96
Planning Officer:	Hebe Smith	Date of Review:	26/03/2026
Site Name:	Stanwick Northfields Lane Westergate PO20 3UH		
Application Description:	Approval of details reserved by condition imposed under AL/70/24/HH relating to condition 3-surface water drainage.		
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 3: **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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	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:

- SURFACE WATER DRAINAGE STRATEGY 1 OF 2 ENV24502-WDE-00-DR-1000 REV00
- SURFACE WATER DRAINAGE STRATEGY SHEET 2 OF 2 ENV24502-WDE-00-DR-2000 REV00
- Existing and Proposed Floor Plans with Externals Dwg. F20d
- SECTION B FLOOD PLAINS, FLOOR DEFENCES AND FLOOD RISK FROM REGULATORY BODY
- SURFACE WATER STORAGE VOLUME DESIGN TOOL
- Drainage Strategy Report ENV24502 rev 01
- Headwall Photographs

Condition wording

Condition 3 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. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council and are an overriding factor in terms of requirements. 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 part of the extended 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.”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Please refer to tracker for detailed comments

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/4/26/DOC Site Name: Stanwick Northfields Lane Westergate PO20 3UH	Initial Issue Date: 26/03/2026 Issue Date: 26/03/2026 Reviewer Reference: ADC/EXT02/96
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Summary and Recommendation:

Condition 3: **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	ADC Drainage Comments		
Date:	21/10/2024 (AL/107/24/DOC)	16/02/2026	26/03/2026		

Condition Number: 3

Comment Number					
1.	Rainwater reuse must be proposed where possible in accordance with the hierarchy for sustainable drainage. Water butts are an effective way of achieving water reuse and interception drainage.	Water butts are included in the revised design and are acceptable for the type and scale of development. Comment closed.			
2.	It is unclear if any existing site drainage features or infrastructure exist and if so, what will be retained or decommissioned. Please clarify.	Existing infrastructure is now shown on the drainage layout plan. Comment closed.			
3.	The site is in flood zone 2, partially in flood zone 3 and at low risk of surface water	From the information provided in the Drainage Statement and review of out			

	flooding. The application does not address flood risk. The designer is expected to ensure that the design is not compromised by flood water entering the site from elsewhere and that this water can continue to flow around or through the site.	datasets we are satisfied that the sustainable drainage system would not be materially affected by inundation during the design storm. Comment closed.			
4.	No assessment of water treatment has been provided, if the design only positively drains the roof areas then it is expected that the proposed silt trap will capture debris in accordance with the requirements of the SuDS Manual. If the design will positively drain the parking area then an assessment of water treatment must be submitted.	Bioretention areas are incorporated into the revised design and provide sufficient water treatment for runoff. Comment Closed.			
5.	Please provide an impermeable area plan clearly showing all contributing impermeable areas, including the driveway if applicable.	Drained areas are unclear from the calculations and no impermeable areas plan has been provided.	Section 3.2 of the report states that the catchment is 300m ² but this has not been demonstrated on a plan. The catchment areas that the Infodrainage calculations are based on must be presented on a plan to allow verification (the areas in the calculations appear to exceed 300m ²). The	Updated plans and calculations attached. See Drawing F21a which confirms roof areas and DS FRADS Giles Vos Rev 03 section 3.2 which confirms catchment areas. PIMP has been increased to 100%	

			calculations show PIMP of 80%, it must be demonstrated that this is accurate.		
6.	The climate change allowance used to support the calculations is incorrect, please amend to 45% for the 1%AEP event and 40% for the 3.33% AEP event.	The correct climate change allowance are now applied. Comment Closed.			
7.	It is not confirmed what rainfall data has been used for the purposes of the design but it is assumed from the inputs that it is FSR. This is not acceptable. Please use FEH 2022 rainfall data.	The simulation settings appear to be based upon FSR rainfall data and have not been updated to FEH22 data.	The calculations are now based on FEH22. Comment closed		
8.	Please confirm that CV values are 1 – that 100% of the proposed contributing impermeable area is accounted for in the design.	Please confirm that CV values are 1 – that 100% of the proposed contributing impermeable area is accounted for in the design.	Section 3.2 of the report states that a Cv or 1 has been used but that calculations appear show summer and winter Cv values of 0.75 and 0.84 have been used. Please clarify.	Updated DS FRADS Giles Vos rev 3 has corrected this. Cv of 1 has been used in calculations	
9.	Please confirm what urban creep allowance is used.	Please confirm what urban creep allowance is used.	Section 3.2 of the report states that an urban creep value of 5% has been used and this is evident in the Infodrainage calculations. Justification of this value is required as it is lower than expected.	Urban creep of 10% has been allowed for in DS FRADS Giles Vos Rev 03	

10.	Please model a surcharged outfall. Where watercourse modelling does not exist or cannot be obtained, the surcharge level can be assumed to be the top of the bank.	Please model a surcharged outfall. Where watercourse modelling does not exist or cannot be obtained, the surcharge level can be assumed to be the top of the bank.	Please model a surcharged outfall. Where watercourse modelling does not exist or cannot be obtained, the surcharge level can be assumed to be the top of the bank.	Updated calculations in DS FRADS Giles Vos 03 have outfall modelled from top of bank. See section 4.4	
11.	Please submit construction detail drawings for all components – see checklist.	Please submit construction detail drawings for all components – see checklist. Particular attention should be paid to the flow control chamber and incorporating blockage protection within and upstream as the flow control device size is highly susceptible to blockage.	Please submit construction detail drawings for all components – see checklist. Particular attention should be paid to the flow control chamber and incorporating blockage protection within and upstream as the flow control device size is highly susceptible to blockage. Please confirm that all pipes can be easily and safely inspected accessed from the proposed chambers. The type of construction appears to obscure visibility and access of some pipes from surface level, and they do not appear to be suitable for entry.	See DS FRADS Giles Vos Rev 03 Appendix E Surface Water Drainage Strategy 1 of 3 24502-ENV-ZZ-00-DR-D-1000 Silt traps are upstream of the flow control chamber. manholls provide access points for rodding. See DS FRADS Giles Vos Rev 03 Appendix F and G Surface Water Drainage Strategy 2 and 3 of 3 24502-ENV-ZZ-00-DR-D-2000 and 24502-ENV-ZZ-00-DR-D-3000 for construction details	
12.	The drainage layout needs a cover level for the attenuation	N/A .Comment Closed.			

	tank and pipe materials should be specified in the notes.				
13.	The submitted documents appear to conflict with each other. The headwall is constructed in a different location to that shown on the drainage layout. This is reflected in our own mapping and the land drainage consent and photos that have been supplied. It is unclear how much of the upstream drainage infrastructure has already been constructed. The previously approved design will require modification following our consultation and the designer will need to illustrate exactly how additional storage will be accommodated. If any installed drainage features require modification this should be detailed on a plan. It is understood that the drainage layout was amended following comments about the conflict with the existing tree. If additional works are required to the drainage infrastructure (changing the liner to impermeable or installing root guards) the designer should consider the impact on the	These issues appear to be substantially resolved in the revised submission. Comment closed.			

	existing tree and how to minimise further damage to the roots.				
14.	When the surface water drainage design is approved, the design must be constructed in accordance with the approved plans. The latest submitted design involves the construction of a new headwall which will require consent under ADC land drainage byelaws.	When the surface water drainage design is approved, the design must be constructed in accordance with the approved plans. The latest submitted design involves the construction of a new headwall which will require consent under ADC land drainage byelaws.	Submit evidence that the required consent has been obtained.	previous consent and condition signing off attached. This relates to LDC/ARUN/2021/012 and AL80/21DOC	
15.			Justify the inclusion of the filtration rate on the ponds. Is this applying some infiltration during simulation, if so, provide infiltration test results demonstrating that it is accurate..	See DS FRADS Giles Vos Rev 03	

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.

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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
- Our core foundations

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DISTRICT COUNCIL

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From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 27 March 2026 13:44

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

Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>

Subject: RE: Planning Consultation on: AL/4/26/DOC

Please find enclosed our consultants response, an objection.

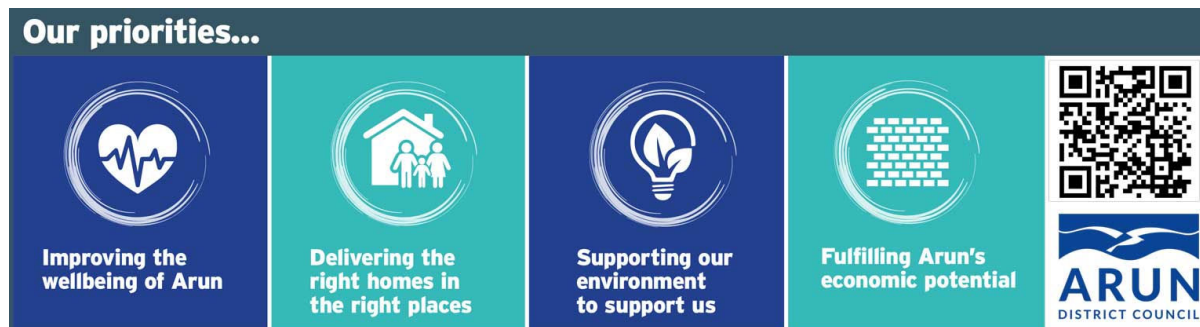
Regards

Paul Cann

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

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

Sent: 26 January 2026 08:33

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

Subject: Planning Consultation on: AL/4/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: AL/4/26/DOC
Registered: 23rd January 2026
Site Address: Stanwick Northfields Lane Westergate PO20 3UH
Description of Works: Approval of details reserved by condition imposed under AL/70/24/HH relating to condition 3-surface water drainage.

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 **9th February 2026**.

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

Hebe Smith

Planning Case Officer- Arun District Council

Telephone: 01903 737626

Email: hebe.smith@arun.gov.uk

PLCONDOC (ODB) 2020