

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/142/25/DOC	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Emma Sheppard	Date of Review:	07/01/2026
Site Name:	Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN		
Application Description:	Approval of details reserved by condition imposed under BE/150/22/OUT relating to condition 24-maintenance and management of surface water drainage system in a site specific maintenance manual.		
Assessment Number:	1 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 24: 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Not applicable	No objection
2. Interception drainage	Not applicable	No objection
3. Extreme Rainfall and Flooding	Not applicable	No objection
4. Water Quality	Not applicable	No objection
5. Amenity	Not applicable	No objection
6. Biodiversity	Not applicable	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:

-DRAINAGE DOCUMENTATION, uploaded in 4 parts via the public planning portal.

Condition wording

Condition 24 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"

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. The maintenance manual submitted to discharge this condition should be a standalone document. It will be based upon the final approved surface water drainage design for the site. No such approved design exists; therefore, this application is pre-emptive.
3. It is requested that any further submissions relating to this condition only include the information that is necessary to assess it.

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: BE/142/25/DOC Site Name: Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN	Initial Issue Date: 07/01/2026 Issue Date: Reviewer Reference: ADC/EXT4b
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Summary and Recommendation:

Condition 24: **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:	07/01/2025				
Condition Number: 24					
Comment Number					
1.	Please submit a standalone site-specific SuDS maintenance manual for assessment. No supporting design documentation aside from the approved plans need to be submitted to support assessment against this condition. Approved plans should be included as appendices to the document. For the purposes of this consultation both insert 12.18 and appendix A have been reviewed. However, due to the lack of detail in appendix A only insert 12.18 is referred to. Please use the suds maintenance manual checklist on our website to				

	assist with the updated submission. suds-maintenance-checklist-oct-2025docx.docx				
2.	The maintenance responsibility section of the manual is not clear. Who will be responsible. It seems that there will be separate management companies for each plot, as well as another for the communal areas. Please include a plan to show maintenance responsibility between these companies.				
3.	It is important that if the design is allowed to flood in an extreme event (1% AEP + CCA) then this is explained within the maintenance manual. Remediation following an extreme event should be detailed.				
4.	Potential performance risks for components should be described. This should include a description of the likely impacts of malfunction to aid fault finding. For example, if the hydrobrake were to have its bypass door left open what would be the risk and impact? (Downstream flooding and				

	liability). Conversely what would be the impact of the hydrobrake being blocked? Or the bypass or retention separators malfunctioning. How would a maintainer recognise these faults? If the channel drains are not kept clear then there could be significant flooding of the loading dock. Consider whole site.				
5.	Linked with 4, please describe the implications of lack of maintenance or incorrect maintenance.				
6.	It is unclear if the 'pond' or any other open land drainage features are part of the SuDS design. They are not included in the maintenance manual and arguably should be.				
7.	Include details for inspection and maintenance of • Pipes • Manholes • Kerb drain				
8.	Include details regarding the symphonic drainage of the roof water and any maintenance requirements for the associated network and vented manholes that				

	may be different to the rest of the system.				
9.	Information regarding proprietary products is insufficient. This does not include the bypass separators or detail of their maintenance. Please include full specifications and maintenance requirements for all components. Paragraph 10.2 makes no sense, this document forms part of the maintenance schedule for the site.				
10.	It is unclear how maintenance for the communal areas will be funded.				
11.	Inspections requirements are not detailed enough. It is advised that an inspection pro-forma is included to ensure consistency of inspection.				
12.	A pre-handover inspection should be stipulated as a requirement.				
13.	Please include details of who to contact if the SuDS system is not functioning correctly.				
14.	Please include a maintenance record proforma.				

15.	Paragraph 4.3 is not specific enough. It refers to the potential need for sediment testing without describing why or when this would be necessary. It also refers to the possibility of spreading sediment arising from maintenance on site without specifying where would be a suitable location for this.				
16.	Are there any prohibited activities? Relating to the permeable paving, open features, flow controls or bypass/retention separators.				
17.	How have health and safety risk of maintenance activities been considered?				
18.	Consider and describe how the maintenance regime will be evaluated and updated if changes are needed.				
19.	Provide advice as to what to do if alterations are to be made to the development or, works are to be carried out which may affect the surface water drainage system.				

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.

PL-Consultation- Engineers response

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

To register to receive notification of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>

Our priorities...

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

Sent: 09 January 2026 09:59

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

Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Emma Sheppard <Emma.Sheppard@arun.gov.uk>

Subject: RE: Planning Consultation on: BE/142/25/DOC

Please find enclosed our external consultants response, an objection.

Regards

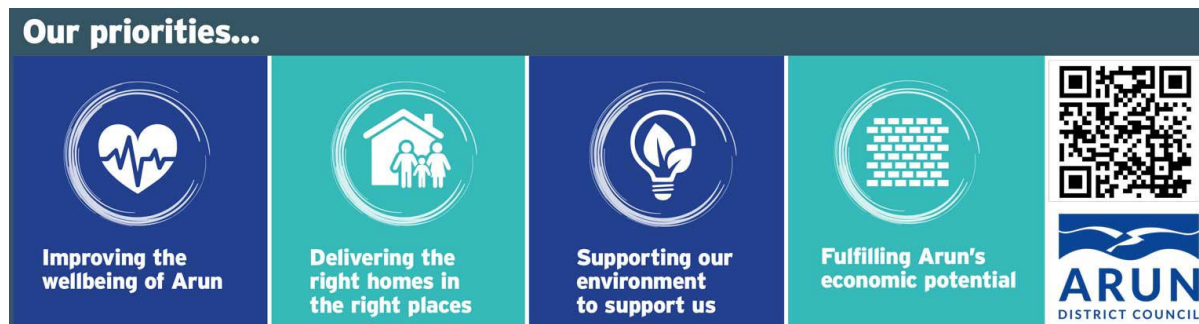
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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 17 December 2025 13:49

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

Subject: Planning Consultation on: BE/142/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BE/142/25/DOC

Registered: 16th December 2025

Site Address: Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN

Description of Works: Approval of details reserved by condition imposed under BE/150/22/OUT relating to condition 24-maintenance and management of surface water drainage system in a site specific maintenance manual.

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 **3rd January 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

Emma Sheppard

Planning Case Officer- Arun District Council

Telephone:

Email: emma.sheppard@arun.gov.uk

PLCONDOC (ODB) 2020