

Engineers Comments Regarding Surface Water Drainage

Application Reference:	CM/11/26/DOC	Reviewer Reference:	ADC/EXT2
Planning Officer:	Kathryn Welch	Date of Review:	22/06/26
Site Name:	Rigates Climping Street Climping BN17 5RQ		
Application Description:	Approval of details reserved by condition under CM/12/25/PL relating to condition 3- Surface Water Drainage.		
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 3: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
6. Biodiversity	Insufficient	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:

- Indicative Surface Water Drainage Layout Dwg no. HC-4274-501
- Catchment Plan Dwg no. HC-4274-501
- Exceedance Plan Dwg no. HC-4274-501
- Typical Surface Water Drainage Details Dwg no. HC-4274-502
- Typical Surface Water Drainage Details Dwg no. HC-4274-503
- Typical Surface Water Drainage Details Dwg no. HC-4274-504
- Technical Note - Response to Comments

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 3:

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Condition wording

Condition 3 is worded as follows:

"Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The full details submitted for approval shall include:

- 1. Winter groundwater monitoring,*
- 2. Winter infiltration testing strictly in accordance with BRE DG 365 or similar approved,*
- 3. Details of the proposed method and location of surface water disposal, in accordance with the SuDS hierarchy,*
- 4. Impermeable area plan,*
- 5. Calculations modelling the surface water drainage network for the following storm events:*
 - a) 100% Annual Exceedance Probability*
 - b) 10% AEP + climate change allowance*
 - c) 3.3% AEP + climate change allowance*
 - d) 1% AEP + climate change allowance*

All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,

- 6. Detailed drainage plans conforming to Local Planning Authority guidance,*
- 7. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,*
- 8. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme.*

The scheme shall then be constructed as per the approved plans. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority"

Consultation comments to the planning officer

0. General

Further information has been submitted by way of a Technical Note dated 8th July 2026. The document does not appear to respond fully to the comments in the tracker attached to this document. It is

recommended that the designer reviews and responds to all comments made on both this summary sheet and the tracker. The tracker should be considered the primary set of comments.

Whilst some information has been submitted that shows compliance with some parts of the 7 Standards, it is not comprehensive enough to demonstrate full compliance.

1. Runoff destination

1.1. Whilst some information has been provided regarding the ability to make a connection by gravity to the public sewer, no information has been provided regarding existing ground levels. The statement that has been made cannot be fully reviewed without that information.

1.2. It is noted that the designer states that providing whole house rainwater recycling is not proportionate. Calculations are required demonstrating yield and demand to evidence this.

2. Interception drainage

2.1. The strategy includes the installation of downpipe/SuDS planters, and it is stated that this will reduce the volume of run off discharged and further information has been supplied regarding the effectiveness of the proposal. Full details of the SuDS planter are required to fully assess this statement. It is noted that rain gardens and bioretention areas are also referred to, full details of these are also required.

2.2. The inclusion of permeable paving when it drains its own catchment is considered to provide an adequate level of interception, however the plan appears to show the runoff from the roof connected to the permeable paving. Further interception measures may be required once the full details of the downpipe/SuDS planters, rain gardens and bioretention areas are provided.

3. Extreme rainfall and flooding

3.1. Details of the existing and proposed external levels have not been submitted. This is required to verify the calculations.

3.2. The catchment plan does not demonstrate how urban creep has been applied, although it does appear to be an allowance in the calculations. The plan should be updated.

3.3. The current Flood Maps for Planning show the site to be at risk of flooding from rivers or the sea in the future. An assessment of the impact of a future flood event on the development and the proposed drainage system should be provided, including mitigation to limit the impact, if required.

4. Water quality

4.1. No comments

5. Amenity

5.1. No comments

6. Biodiversity

6.1. Full details of the downpipe/SuDS planters are required along with the rain gardens and bioretention areas.

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

7.1. Full details of all SuDS components are required

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: CM/11/26/DOC Site Name: Rigates Climping Street Climping BN17 5RQ	Initial Issue Date: 22/06/26 Issue Date: 17/08/26 Reviewer Reference: ADC/EXT02
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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	Designer Response	ADC Drainage Comments		
Date:	18/06/2026		17/08/2026		
Condition Number: 3					
Comment Number					
1.	Provide evidence from Southern Water that the public sewer has capacity to accept the proposed flows. (Standards 1 and 3)		Capacity check provided, comment closed		
2.	Demonstrate that the proposed drainage system can drain by gravity to the proposed destination. (Standard 1)		This cannot be fully reviewed until a drawing showing existing levels is provided. It is noted that it is intended to constrict a new manhole on the existing public sewer, this must be added to the drawings, including its cover and invert levels.		
3.	Clarify the reason for the sewer requisition demonstrate that Southern		Designer confirms not required however it is still referenced on the drawings.		

	Water has agreed to provide it (Standard 1)				
4.	Rainwater reuse is Priority 1 with regard to runoff destination. It should be included in the proposal or justification must be provided for its omission. (Standard 1 and 2)		Calculations to be provided to demonstrate yield and demand to evidence the statement that whole house system is not a proportionate response.		
5.	The strategy includes the installation of downpipe/SuDS planters, and it is stated that this will reduce the volume of run off discharged. This statement should be evidenced (Standard 2)		Comment noted, cannot be fully reviewed until full details of the SuDS planter are provided. Response refers to SuDS planters, raingardens and bioretention system. Details will be required for all components proposed.		
6.	The run off from the roof appears to connect to the permeable paving which may result in the permeable paving being non-compliant as a method of interception if comment 5 cannot be evidenced. (Standard 2)		Comment still stands.		
7	Details of the existing and proposed external levels have not been submitted. This is required to verify the calculations (Standard 3)		Provide a clear plan showing existing and proposed levels. Note this is required to assess if there is any run off from other areas entering the proposed drainage system. Eg		

			from the retained access to the existing retained Rigates building.		
8	A detailed drainage plan is required that cross references with the calculations. The calculations must align with the drawings. Similarly a catchment plan is required showing each pipe catchment and how urban creep has been allowed for (Standard 3)		Whilst the calculations appear to include an allowance for urban creep, the catchment plan does not demonstrate how urban creep has been applied.		
9	The calculations must include an allowance for surcharging of the outfall (Standard 3)		Whilst the report states that a surcharged outfall has been included in in the calculations, this does not appear to be reflected in the calculations included in the report.		
10	Demonstrate how the surface water drainage design is integrated with amenity. (Standard 5)		Comment closed		
11	With regard to biodiversity, the provision of downpipe/SuDS planters is acknowledged. An assessment of the impact of these must be provided (Standard 6).		Full details of the SuDS planters are required to fully assess the response		
12	Provide fully detailed and coordinated construction		A response to this comment does not		

	level drawings. It is recommended that reference is made to the checklist available on Arun District Councils website. (Standard 7)		appear to have been provided.		
13	Provide full details/specifications for all SuDS features/products. If additional information is required from other consultants, it should also be provided. (Standard 7)		A response to this comment does not appear to have been provided.		
14	The CL and IL shown on the plan on permeable paving at the rear of the building indicate a total depth of construction of 600mm. This does not appear to coordinate with the permeable paving detail Type A. (Standard 7)		A response to this comment does not appear to have been provided.		
15	The CL and IL shown on the plan on permeable paving in the driveway indicates a total depth of construction of 700mm, suggesting 50mm thick blocks. Please confirm the product for this block thickness. (Standard 7)		A response to this comment does not appear to have been provided.		
16	Show clearly on the plan and sections which areas of permeable paving have which sub base thicknesses. (Standard 7)		A response to this comment does not appear to have been provided.		

17	Demonstrate that soil particles/fines from the SuDS planters will not migrate to the permeable paving sub base.		A response to this comment does not appear to have been provided.		
19			With regard to point 3.7 in the report, the current flood maps for planning show that the site is at risk of flooding from rivers or the sea in the future. Provide an assessment of the effect that this will have on the development and the surface water drainage system together with mitigation to limit the effect, If required.		
20			Details of the proposed check dams have now been provided but not state the size of the orifice that is required. The plan shows varying sizes, this should be reflected on the detail. Similarly, the full specification/product codes should be provided for all components, eg. WASP membrane is available in various gauges.		
21			Ensure that all drawings are coordinated. Eg. the		

			sub base specified on drawing 502 differs to that specified on drawing 504		
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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.

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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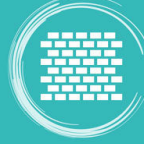
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 18 August 2026 16:08
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 Re-Consultation on: CM/11/26/DOC

Please find enclosed our consultants response, not recommending discharge of condition.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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



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Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 17 July 2026 11:48
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: CM/11/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	CM/11/26/DOC
Registered:	30th April 2026
Site Address:	Rigates Climping Street Climping BN17 5RQ
Grid Reference:	500140 101531
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition under CM/12/25/PL relating to condition 3- Surface Water Drainage.

I am able to inform you that I have received an amendment to the above application dated 8th July 2026 relating to: Additional Technical Note

If you should wish to make further representations as a result of this amendment, please make any further comment by **31st July 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

Kathryn Welch

Planning Case Officer-Arun District Council

Telephone: 01903 737789

Email: kathryn.welch@arun.gov.uk

PLRECON_DOC (ODB) 2020