

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	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:

- Drainage documentation- Part 1 dated 31.03.2026
- Supplementary Ground Investigation Report 27.03.2026 Issue 1.
- CCTV Survey- Part 1
- CCTV Survey- Part 2
- CCTV Survey Summary

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

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. The drawings that have been submitted are noted as being indicative, the submitted information should be suitable for use during construction.

1. Runoff destination

- 1.1. It is accepted that infiltration methods of drainage are not likely to be suitable due to the depth of the groundwater in the winter.
- 1.2. The surface water drainage strategy includes a new connection to the existing public surface water sewer at a restricted rate. No evidence has been supplied to confirm that the existing public surface water sewer has capacity to accept the additional flow.
- 1.3. The new connection is shown as being secured under a sewer requisition, which is unusual unless there is a land ownership issue. If that is the case, it should be demonstrated that Southern Water will provide the connection.
- 1.4. Additionally, there does not appear to be any assessment that the proposed development can drain by gravity to the existing public sewer (it is noted that limited information regarding the public surface water sewer is included in the public sewer records).

2. Interception drainage

- 2.1. Water reuse is acknowledged the strategy as being part of the SuDS hierarchy but it does not appear to be proposed and no reasons are given to justify why.
- 2.2. 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.
- 2.3. 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 for the roof run-off, if evidence of evapotranspiration cannot be provided for the downpipe/SuDS planters.

3. Extreme rainfall and flooding

- 3.1. In principle, the method used in the calculations is accepted, the FEH rainfall data file should be emailed to land.drainage@arun.gov.uk
- 3.2. Details of the existing and proposed external levels have not been submitted. This is required to verify the calculations.
- 3.3. A plan has not been submitted that cross references with the calculations.
- 3.4. It has not been demonstrated that capacity exists in the public sewer network to accept the proposed flows.
- 3.5. A catchment plan should be provided which can be cross referenced to the calculations and including how urban creep has been applied.
- 3.6. There does not appear to be an allowance for surcharging of the outfall
- 3.7. There does not appear to be an assessment of the impact that a flood event would have on the proposed surface water drainage system.

4. Water quality

- 4.1. No comments

5. Amenity

- 5.1. No information has been submitted. The applicant may wish to assess if the small site exception would apply in this instance.

6. Biodiversity

- 6.1. The provision of downpipe/SuDS planters is acknowledged but no assessment of the impact of these has been included.

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

7.1. The submitted drawings are indicative, construction level information is 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: 22/06/26 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			
Date:	18/06/2026				
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)				
2.	Demonstrate that the proposed drainage system can drain by gravity to the proposed destination. (Standard 1)				
3.	Clarify the reason for the sewer requisition demonstrate that Southern 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)				
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)				
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)				
7	Details of the existing and proposed external levels have not been submitted. This is required to verify the calculations (Standard 3)				
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)				
9	The calculations must include an allowance for				

	surcharging of the outfall (Standard 3)				
10	Demonstrate how the surface water drainage design is integrated with amenity. (Standard 5)				
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).				
12	Provide fully detailed and coordinated construction level drawings. It is recommended that reference is made to the checklist available on Arun District Councils website. (Standard 7)				
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)				
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)				
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)				
16	Show clearly on the plan and sections which areas of permeable paving have which sub base thicknesses. (Standard 7)				
17	Demonstrate that soil particles/fines from the SuDS planters will not migrate to the permeable paving sub base.				

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: Daun Johnson on behalf of Planning.Responses
Sent: 23 June 2026 13:21
To: Planning Scanning
Subject: FW: Planning Consultation on: CM/11/26/DOC
Attachments: CM-11-26-DOC - Rigates Climping Street.docx

Please upload attachment to CM/11/26/DOC, planning, consultee response, END

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



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 23 June 2026 08:55
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 Consultation on: CM/11/26/DOC

Please find enclosed our consultants response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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

From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 07 May 2026 14:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning 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

Description of Works: Approval of details reserved by condition under CM/12/25/PL 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 **21st May 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

Kathryn Welch

Planning Case Officer- Arun District Council

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Email: kathryn.welch@arun.gov.uk

PLCONDOC (ODB) 2020