

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/10/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Daniel Vick	Date of Review:	15/06/2026
Site Name:	Land off Stanhorn Grove Felpham PO22 8FA		
Application Description:	Approval of details reserved by condition under FP/32/25/S73 relating to conditions 6 & 7 - drainage.		
Assessment Number:	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 6: Objection Condition 7: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Insufficient	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	N/A	
6. Biodiversity	N/A	
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:

- 0043 - Drainage Strategy Report - Care Home at Stanhorn Grove, Felpham PO22 8FA - Rev(C)
- 0043 - Foul and Surface Water Maintenance Management Plan

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 6:

- N/A

The following plans/documents should be listed as approved in respect to condition 7:

- N/A

Condition wording

Condition 6 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 building / 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."

Condition 7 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 precommencement 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.

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: FP/10/26/DOC Site Name: Land off Stanhorn Grove Felpham PO22 8FA	Initial Issue Date: 16/02/2026 Issue Date: 15/06/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 6: **Objection**

Condition 7: **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	ADC Drainage Comments	
Date:	10/12/2026 (FP/181/25/DOC)	30/01/2026 (FP/181/25/DOC)	16/02/2026	15/06/2026	

Condition Number: 6

Comment Number					
1.	Groundwater monitoring has not been provided to justify the design of infiltration. The NSfS includes a requirement for a 1m unsaturated zone between the base of infiltration features and winter high groundwater levels	Groundwater monitoring results recorded in Appendix I. Design updated accordingly due to shallow groundwater	Noted, comment closed.		
2.	The ground investigation was undertaken in summer and two infiltration tests were carried out, one infiltration test failed and the other was partially within made ground. This indicates variability of	Soakaways now not feasible due to recorded groundwater levels.	Noted, comment closed.		

	infiltration across the site. An additional test in the location of the proposed soakaways should be provided during winter or spring months.				
3.	Construction details should be provided for all drainage elements including the permeable surface paving and the soakaway.	See updated drawings I Appendix F	A construction detail should be provided for the flow control chamber.	A detail is provided but it does not appear to comply with the recommendations of the flow control device manufacturer. This should be checked and updated. There is also a concern that the crate installation detail does not contain sufficient detail to guarantee watertight construction. This is essential as it is below the high groundwater level. The crate installation must be fully watertight with welded joints formed in an impermeable membrane protected from puncture and using watertight pipe connections. This is not clear from the detail provided. The perforated pipes within the permeable pavement appear to be shallow and unprotected and therefore susceptible to collapse under vehicle loading, the detail should be clarified.	
4.	The drained areas are listed as a total of 3,878sqm whereas the calculations only include 0.327ha.	See updated report and additional drawing in Appendix F showing drained areas	Revised impermeable drained areas acceptable, comment closed.		

5.	The proposed soakaway is designed using a factor of safety of 1 which is not in accordance with the NSIS.	Soakaway no longer proposed	Noted, comment closed.		
6.	The calculations do not use the latest rainfall data. Site specific FEH data should be used and the data location coordinates confirmed.	Calculations updated accordingly as shown in Appendix E.	Noted, comment closed.		
7.	The CV values should be 1.0.	Calculations updated accordingly as shown in Appendix E.	Noted, comment closed.		
8.	The Climate Change Allowance should be 45%.	Calculations updated accordingly as shown in Appendix E.	Noted, comment closed.		
9.			Additional comment. The revised drainage strategy includes offsite private drainage infrastructure and an offsite outfall to an ordinary watercourse. Evidence should be provided of land ownership, or legal ability to install and maintain the infrastructure together with permission from the riparian owner to discharge to the watercourse.	This is now contained within the revised Drainage Statement, comment closed.	
10.			Evidence of Ordinary Water Consent (OWC) from the LLFA will be required or if deemed not to warrant an OWC, Land Drainage Byelaw consent will be	This is now contained within the revised Drainage Statement, comment closed.	

			required from ADC Land drainage byelaw consent, in order to discharge the condition. https://www1.arun.gov.uk/land-drainage-byelaw-consent		
11.			The drained area is less than the area used to calculate greenfield runoff and should be the same. There is guidance on the ADC website which includes requirements for calculation of greenfield runoff and assessment of drained areas.	This is now correct, comment closed.	
12.				Additional comment: There are a number of permeable paving compartments which are not physically segregated. They are not defined in plan and it is difficult to audit the areas. The overflow level in the plans appears to be 2.78m AOD. The modelled compartments all have higher exceedance level and fill to higher levels during the design storm, some clarification is required to confirm that the permeable paving would fill to the modelled levels without overtopping at the low point of the combined construction.	
13.				Additional comment: There are trees shown within the plan	

				area of the crate storage installation. The coordinated design needs to be confirmed to ensure the trees will not damage the installation.	
Condition Number: 7					
Comment Number					
1.	The MMP will need to be reviewed again once the drainage design is confirmed or updated.		The drainage design is not yet approved and we are not yet able to approve the MMP.	The drainage design is not yet approved and we are not yet able to approve the MMP.	
2.	The MMP should be a standalone document which can be passed to the Facility Management for implementation and include drainage plans, key drainage product information and a proforma / checklist for inspections.	The maintenance plan is shown in Appendix D. This will be combined with the As Built drawings at the end of the project for including within the O&M manuals	There is a checklist available from the ADC webpages which stipulates the contents requirements for the MMP, as a standalone document not as an appendix to a drainage report. Please review and ensure all aspects are incorporated for the final issue.	The MMP should be a standalone document containing the required information for the facility management provider to maintain the drainage infrastructure appending the design drawings and key product specification together with a proforma for maintenance inspections.	

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
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>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 June 2026 12:07
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Daniel Vick <Daniel.Vick@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: FP/10/26/DOC

Please find enclosed our consultants response.

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



Our priorities...



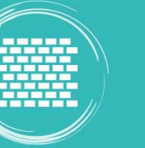
Improving the wellbeing of Arun



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: 29 May 2026 15:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: FP/10/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: FP/10/26/DOC
Registered: 30th January 2026
Site Address: Land off Stanhorn Grove Felpham PO22 8FA

Grid Reference: 495454 101304
Category: Discharge of Condi
Description of Works: Approval of details reserved by condition under FP/32/25/S73 relating to conditions 6 & 7 - drainage.

I am able to inform you that I have received an amendment to the above application dated 29th May 2026 relating to: Amended documents.

If you should wish to make further representations as a result of this amendment, please make any further comment by **12th June 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

Mr D Vick

Planning Case Officer-Arun District Council

Telephone: 01903 737771

Email: Daniel.Vick@arun.gov.uk

PLRECON_DOC (ODB) 2020