

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/10/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Daniel Vick	Date of Review:	29/09/2026
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:	5		

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: No 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 (Chapter 18). 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No 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 August 2026 Rev E
- Engineers response
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Plans/Documents to be listed as approved

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

- Drawing 0043/SL(5)500 revision Q : Drainage Layout
- Drawing 0043/SL(5)501 revision - : Drainage Details
- Drawing 0043/SL(5)502 revision M : Drainage Layout – Foul Connection
- Drawing E01926_01 revision - : Attenuation Tank 1 Detail

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

- N/A

Condition wording

Condition 6 (surface water drainage) 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 (maintenance and management of surface water drainage) 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.
2. We have reviewed Revision E of the Drainage Statement dated 12 August 2026.

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: 29/09/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 6: **No 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:	10/12/2025 (FP/181/25/DOC)	20/08/2026	28/08/2026	29/09/2026	

Condition Number: 6

Comment Number					
1 (Formerly 3)	Construction details should be provided for all drainage elements including the permeable surface paving and the soakaway. Designer Response 30/01/2026 (FP/181/25/DOC) See updated drawings I Appendix F ADC Drainage Comments 16/02/2026 A construction detail should be provided for the flow control chamber. ADC Drainage Comments 15/06/2026	None ADC Drainage Comments 27/07/2026 The details within revision D of the Drainage statement dated 26 June appear unchanged. Repeat comment: 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	Drawing 502L 'Drainage Layout – Foul Connection' and 500P 'Drainage Layout' within Appendix F of the submitted report (Drainage Strategy Rev D) is unchanged since our previous comments. No new details are provided. We cannot locate minimum depth of cover calculations in Appendix E. Designer Response: None	The shallow pipes have been deepened and are supported by structural design calculations, which appear to be acceptable. The flow control chamber and cellular storage construction details have been added to drawing 502M and is acceptable. Comment closed.	

	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	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. Designer Response 31/07/2026 and 20/08/2026 Within the Rev D drainage strategy report the flow control detail was removed from the drainage drawing in Appendix F and the Hydrobrake Technical details were added as a separate Appendix N within the report. Can you please clarify which detail you are			
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	collapse under vehicle loading, the detail should be clarified.	referring to that does not comply with the recommendations. The attenuation tank is supplied and installed by SDS full details of their installation and membrane are contained within Appendix M of the Rev D Drainage Strategy Report The cover above the pipe has been design checked and confirmed suitable for vehicle loading above as noted on the drainage drawing in Appendix F of the Rev D drainage strategy report. <i>Please refer to updated drawing 502 within Appendix F with hydrobrake chamber details added.</i> <i>The material specifications are provided within Appendix M.</i> <i>The impermeable GEMembrane was an UltraFlex Smooth by GSE Environmental 1mm thickness.</i> <i>I have updated to include specifications on the drawing 502 in Appendix F.</i> <i>Min depth of cover added to drawing and section details.</i>			
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		<i>Supporting calculation for min cover depth added to Appendix E.</i>			
2 (Formerly 9)	ADC Drainage Comments 16/02/2026 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. ADC Drainage Comments 15/06/2026 This is now contained within the revised drainage statement. Comment closed				
3 (Formerly 10)	ADC Drainage Comments 16/02/2026 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 required from ADC Land drainage byelaw			Arun DC Bylaw consent included in Drainage Statement. Comment closed.	

	consent, in order to discharge the condition. https://www1.arun.gov.uk/land-drainage-byelaw-consent ADC Drainage Comments 15/06/2026 This is now contained within the revised permeable paving would fill to the modelled levels without overtopping at the low point of the combined construction				
4 (Formally 11)	ADC Drainage Comments 16/02/2026 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. ADC Drainage Comments 15/06/2026 This is now correct, comment closed				
5 (Formally 12)	ADC Drainage Comments 15/06/2026 Additional comment: There are a number of permeable paving compartments which are not	None ADC Drainage Comments 27/07/2026	Drawing 502L'Drianage Layout – Foul Connection' and 500P 'Drainage Layout' within Appendix F of the submitted report (Drainage Strategy Rev D) is	The layout of the permeable paving compartments is clarified on drawing 500Q. Comment closed.	

	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.	It is not clear how this comment has been addressed. Some commentary or response from the designer should be provided. Designer Response 31/07/2026 and 20/08/2026 The permeable paving zones are indicated on the drainage layout drawing SL500(P) within Appendix F of the report. The zones are highlighted with an orange dotted line and the reference numbers are consistent between this drawing and the drainage calculations in Appendix E. A dam is created between the paving zones using the impermeable membrane like the image below. We will add this detail to the drawing for clarity.	unchanged since our previous comments.		
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6 (Formerly 13)	ADC Drainage Comments 15/06/2026 Additional comment: There are trees shown within the plan area of the crate storage installation. The coordinated design needs to be confirmed to ensure trees will not damage the installation	None ADC Drainage Comments 27/07/2026 Comment closed			
Condition Number: 7					
Comment Number					
1	The MMP will need to be reviewed again once the drainage design is confirmed or updated. Designer Response 30/01/2026 (FP/181/25/DOC) ADC Drainage Comments 16/02/2026 The drainage design is not yet approved and we are not yet able to approve the MMP ADC Drainage Comments 15/06/2026 The drainage design is not yet approved and we are not yet able to approve the MMP.	None ADC Drainage Comments 27/07/2026 Repeat comment: The drainage design is not yet approved and we are not yet able to approve the MMP.	No Change.	Comment closed.	
2	The MMP should be a standalone document which can be passed to the Facility	None	No Change.	The MMP has not been updated to include the design drawings. The information is spready	

	Management for implementation and include drainage plans, key drainage product information and a proforma / checklist for inspections. Designer Response 30/01/2026 (FP/181/25/DOC) 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 ADC Drainage Comments 16/02/2026 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 ADC Drainage Comments 15/06/2026 The MMP should be a stand-alone document containing the required information for the facility management provider to maintain the	ADC Drainage Comments 27/07/2026 Repeat comment: The MMP should be a stand-alone 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		between Appendix M and N in the Drainage Statement and the 'SuDS Maintenance Management Plan. The MMP should be a standalone document which can be passed to the facility management and contain all necessary information including the drainage design plans, maintenance schedules, maintenance proforma and product information. Guidance on maintenance plans is provided on Arun DC webpages, here: https://www.arun.gov.uk/designer-checklists	
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	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: 06 October 2026 14:49
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, recommending discharge of condition 6 but not condition 7.
Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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

From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 17 September 2026 09:19
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 16th September 2026 relating to: Substitute drainage strategy
If you should wish to make further representations as a result of this amendment, please make any further comment by **27th September 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