

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/181/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Silvie Steiningerova	Date of Review:	10/12/2025
Site Name:	Land off Stanhorn Grove Felpham PO22 8FA		
Application Description:	Approval of details reserved by condition imposed under FP/32/25/S73 relating to conditions 6-surface water drainage, 7-maintenance and management of surface water drainage and 23-sewerage network enforcement (please see FP/180/25/DOC for conditions 3-colour schedule of materials and finishes, 11-non-licensed Great Crested Newt Method Statement, 12-Construction Environmental Management Plan, 13-Landscape and Ecological Management Plan, 14-Biodiversity Enhancement Strategy, 17-landscape scheme and 18-Construction Management Plan).		
Assessment Number:	1		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

- SOUTH EAST AND SOUTH WEST ELEVATIONS PC01 REVA
- NORTH WEST AND NORTH EAST ELEVATIONS PC02 REVA
- NORTH WEST AND SOUTH EAST SECTIONAL ELEVATIONS PC03 REVA
- SITE PLAN SHOWING HARD LANDSCAPING PC04 REVA
- FOUL AND SURFACE WATER DRAINAGE STRATEGY uploaded in 3 parts via the public planning portal
- SITE PLAN SHOWING HARD LANDSCAPING PC04 REVA
- SOFT LANDSCAPE SPECIFICATION
- LANDSCAPE PROPOSALS PRI24891 11 SHEET 1
- LANDSCAPE PROPOSALS PRI24891 11 SHEET 2

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 precommencement 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 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.

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/181/25/DOC Site Name: Land off Stanhorn Grove Felpham PO22 8FA	Initial Issue Date: 10/12/2025 Issue Date: 10/12/2025 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			
Date:	10/12/2025				
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.				
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 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.				
4.	The drained areas are listed as a total of 3,878sqm whereas the calculations only include 0.327ha.				
5.	The proposed soakaway is designed using a factor of safety of 1 which is not in accordance with the NSfS.				
6.	The calculations do not use the latest rainfall data. Site specific FEH data should be used and the data location coordinates confirmed.				
7.	The CV values should be 1.0.				
8.	The Climate Change Allowance should be 45%.				
Condition Number: 7					
Comment Number					
1.	The MMP will need to be reviewed again once the drainage design is confirmed or updated.				
2.	The MMP should be a stand alone 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.				

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: Nicola Spencer on behalf of Planning.Responses
Sent: 12 December 2025 16:59
To: Planning Scanning
Subject: FW: Planning Consultation on: FP/181/25/DOC
Attachments: FP-181-25-DOC - Land off Stanhorn Grove FEL V1.docx

Nicola Spencer
Technical Support Manager
Planning Services

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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>



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: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 12 December 2025 14:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>
Cc: Silvie Steiningerova <Silvie.Steiningerova@arun.gov.uk>
Subject: RE: Planning Consultation on: FP/181/25/DOC

Hi Silvie,

Find the consultation – an objection – attached.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

Kind regards

Sarah Burrow
Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737815
E: sarah.burrow@arun.gov.uk

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 25 November 2025 08:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: FP/181/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	FP/181/25/DOC
Registered:	24th November 2025
Site Address:	Land off Stanhorn Grove Felpham PO22 8FA
Description of Works:	Approval of details reserved by condition imposed under FP/32/25/S73 relating to conditions 6-surface water drainage, 7-maintenance and management of surface water drainage and 23-sewerage network enforcement (please see FP/180/25/DOC for conditions 3-colour schedule of materials and finishes, 11-non-licenced Great Crested Newt Method Statement, 12-Construction Environmental Management Plan, 13-Landscape and Ecological Management Plan, 14-Biodiversity Enhancement Strategy, 17-landscape scheme and 18-Construction Management Plan).

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 **9th December 2025**.

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

Silvie Steiningerova

Planning Case Officer- Arun District Council

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Email: silvie.steiningerova@arun.gov.uk