

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/100/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	18/06/2026
Site Name:	Ambulance Station East Street Littlehampton BN17 6AU		
Application Description:	Approval of details reserved by condition under LU/45/24/PL relating to conditions 18- Surface Water Drainage Scheme and 19- Maintenance & Management of Surface Water Drainage System.		
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 18: No objection Condition 19: No 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Drainage Layout General Details 25196/01 P3
- Drainage Report 28.01.26 Rev B
- SuDS Details 25196/02 P2
- Southern Water Letter - Application to Connect to the Public Sewerage System - Section 106
- Surface Water Drainage System Maintenance Manual
- Designers Response Checklist
- Engineers response
- EMAIL 28.5.26 subplans

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 18:

- Drainage Layout General Details 25196/01 P3
- SuDS Details 25196/02 P2

The following plans/documents should be listed as approved in respect to condition 19:

- Surface Water Drainage System Maintenance Manual Dated 26/05/2026 Rev Issue 2.

Condition wording

Condition 18 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 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 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 19 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: LU/100/26/DOC Site Name: Ambulance Station East Street Littlehampton BN17 6AU	Initial Issue Date: 15/01/2026 Issue Date: 18/06/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 18: **No objection**

Condition 19: **No 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	ADC Drainage Comments	Designer Response	ADC Drainage Comments	
Date:	15/01/2026 (LU/266/25/DOC)	05/03/2026	26/05/2026	18/06/2026	
Condition Number: 18					
Comment Number					
1.	Confirmation of approval to connect to the combined sewer is required.	Confirmation of approval to connect to the combined sewer is required. ADC Drainage Comments 15/05/2026 Confirmed, comment closed.			
2.	A full technical design should be provided to discharge conditions please provide levels design and details for pavements.	Sufficient detail is now provided. Comment closed.			
3.	The proposed peak flow noted on the drainage plan has increased from the planning stage submission from 0.6l/s to 1.0l/s. Design peak flow should be based upon the per hectare	The flow control has been altered to 0.6l/s. Comment Closed.			

	GFR rates converted to a litre per second rate based upon the drained impermeable area.				
4.	The drainage calculations are based upon the Flood Studies Report and do not use the most up to date FEH rainfall data.	FEH data now appears to be used in the calculations. FEH data should be provided confidentially to land.drainage@arun.gov.uk ADC Drainage Comments 15/05/2026 The FEH data used is not clear from the drainage calculation output files.	FEH files sent to land.drainage@arun.gov.uk	Comment closed.	
5.	The proposed flow control device has a small orifice and could be susceptible to blockage as there are currently upstream inputs not filtered through the permeable paving. The mesh grill is noted and we would also wish to see a high level overflow to prevent flooding in the event of blockage. Consideration should also be given to filtering rainwater from roof areas prior to discharge	The upstream drainage appears to be filtered through sustainable drainage methods but the perforated pipes through the filter drains could convey detritus from downpipes and a risk of blockage to the relatively small flow restriction (35mm) remains. Further clarification of the design to remove the risk of blockage from the flow control device is needed. ADC Drainage Comments 15/05/2026 The design is not clear enough that the connection from the downpipes do not	Silt traps added to downpipes that connect to the perforated pipe. Gravel traps added to downpipes that discharge directly to raingarden surface. S1 and S2 are also silt traps for added protection of flow control chamber. peak flow. The layout plan should also clarify the arrangement as it currently appears to show short lengths of pipe.	Comment closed.	

		join directly to the perforated collector pipe in the raingardens. A detail is needed to specify the outlet from the rainwater pipes to ensure the flow is filtered as there is no additional blockage protection at the flow control chamber and the restriction is necessarily a very small opening to achieve the desired peak flow. The layout plan should also clarify the arrangement as it currently appears to show short lengths of pipe.			
6.	The rain gardens and filter drains included at planning stage are removed and should be reinstated or design changes justified. The roof drainage could also potentially be filtered through the permeable pavement foundation.	Comment closed.			
7.	The drainage plan should confirm the base level and any base gradients within the porous attenuation foundation.	Comment closed.			
8.	The technical design should be supported by drainage calculations which analyse the system as a network including pipes, attenuation, flow control and outlet.	Comment closed.			

9.	Water butts shown at planning stage are missing from the design	Comment closed.			
Condition Number: 19					
Comment Number					
1.	The MMP should include all aspects of the sustainable drainage system.	Comment Closed.			
2.	The MMP should set out ownership and maintenance responsibilities and parties involved including a plan which highlights infrastructure.	Comment Closed.			
3.	Guidance on MMPs is available on Arun DC webpages - https://www.arun.gov.uk/designer-checklists/ The MMP should meet the criteria set out on the checklist.	The MMP must include approved design plans. These are awaited, see comments to LU/266/25/DOC – Approval of details for Condition 18. ADC Drainage Comments 15/05/2026 The MMP currently refers to separate plans. The plan should be a stand-alone document which can be approved to discharge the condition and passed to the maintenance provider including all necessary information. Please append the updated drawings to the MMP.	MMP contains all relevant information in one document	Comment closed.	

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: Elaine Walby on behalf of Planning.Responses
Sent: 22 June 2026 11:20
To: Planning Scanning
Subject: FW: Planning Re-Consultation on: LU/100/26/DOC
Attachments: LU-100-26-DOC - Ambulance Station 2.docx

PL- Consultation- Engineers response

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Our priorities...



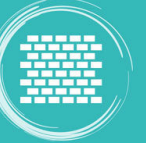
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 22 June 2026 10:13
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: LU/100/26/DOC

Please find enclosed our consultants response recommending discharge of conditions.

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: 08 June 2026 13:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: LU/100/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	LU/100/26/DOC
Registered:	29th April 2026
Site Address:	Ambulance Station East Street Littlehampton BN17 6AU
Grid Reference:	503094 102435
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition under LU/45/24/PL relating to conditions 18- Surface Water Drainage Scheme and 19- Maintenance & Management of Surface Water Drainage System.

I am able to inform you that I have received an amendment to the above application dated 26th May 2026 relating to: Substitute drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **22nd 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

Kathryn Welch

Planning Case Officer-Arun District Council

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Email: kathryn.welch@arun.gov.uk

PLRECON_DOC (ODB) 2020