

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/141/26/DOC	Reviewer Reference:	ADC/EXT2/D2134/111
Planning Officer:	Hannah Kersley	Date of Review:	01.09.2026
Site Name:	Southern Allotments Hampton Park Littlehampton		
Application Description:	Approval of details reserved by condition imposed under LU/47/11 relating to condition 10-surface water 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 10: 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
2. Interception drainage	Compliant	No objection subject to conditions
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Compliant	No objection subject to conditions
6. Biodiversity	Compliant	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection subject to conditions

Reviewed Plans

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

- OVERALL DRAINAGE LAYOUT 519.1.VCE.0500 REV T5
- DRAINAGE LAYOUT SHEET 2 OF 2 519.1.VCE.0502 REV T5
- PRIVATE DRAINAGE CONSTRUCTION DETAILS SHEET 2 OF 2 519.1.VCE.0506 REV T5
- IMPERMEABLE AREAS LAYOUT 519.1.VCE.0521 REV T3
- NETWORK 1 V4 APPROVAL RESULTS 100 YR
- NETWORK 1 V4 APPROVAL RESULTS 10 YR

- NETWORK 1 V4 APPROVAL RESULTS 30 YR
- Designers Response
- Engineers Comments Regarding Surface Water Drainage

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 10:

Condition wording

Condition 10 is worded as follows:

"No development shall begin until a fully detailed surface water drainage scheme for that phase of the development, based on sustainable drainage principles and designed in accordance with the SUDS strategy for the whole development, has been submitted to and approved in writing by the Local Planning Authority. It should be demonstrated how each detailed scheme will contribute to delivering, and link into, the surface water drainage strategy for the site as a whole.

- The SUDS shall be designed to attenuate the 1 in 100 year storm event (plus climate change allowance of 30% in accordance with DEFRA's National Standards for Sustainable Drainage Systems).

- No infiltration of surface water drainage shall occur within ground affected by contamination unless suitable remediation is undertaken.

- Each detailed scheme should include a timetable for its implementation; and provide a management and maintenance plan in the form of a site specific Maintenance Manual for the SUDS system for the lifetime of the development.

This shall include the arrangements for adoption by any public authority or statutory undertaker or details of the financial management of the scheme throughout its lifetime.

Elements of the scheme serving any particular phase shall subsequently be implemented in accordance with the approved details (unless otherwise agreed with the Local Planning Authority) prior to the occupation of any dwellings in that phase and no building in that phase of the development shall be occupied until the surface water drainage scheme has been fully implemented in accordance with the approved details.

Reason: To ensure that the proposed development is satisfactorily drained to prevent the increased risk of flooding, and improve and protect water quality, habitat and amenity, and ensure future maintenance of these in accordance with national guidance and policies GEN7, GEN9 of the Arun District Local Plan"

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/141/26/DOC Site Name: Southern Allotments Hampton Park Littlehampton	Initial Issue Date: Issue Date: Reviewer Reference:
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Summary and Recommendation:

Condition 10: **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	ADC Drainage Comments	ADC Drainage Comments	
Date:	29/10/2025	14/01/2026 (LU/185/26/DOC)	10.07.2026	01.09.2026	

Condition Number: 10

Comment Number					
1.	Please indicate how the national standards for SuDS are going to be met and delivered within the proposed scale and layout of the site. Where departures from these standards may be necessary these must be highlighted and requested. A request for a departure does not mean that it will be supported or agreed. Designer Response 26/11/2025 Please refer to the Peter Brett Associates LLP Flood Risk	Both documents quoted out date national standards. Whilst earlier data is correct at the time of writing the technical note relative to this application shall be updated as per the previous comment. Comment outstanding. Designer Response 27/105/2026 The garden allotment site forms part of the approved Peter Brett Associates LLP Flood Risk Assessment, Ref. 21491/002 Rev. B,	The application response is accepted in this instance. Comment closed.		

	Assessment (Ref: 21491/002 Rev. B) and the WYG Drainage Strategy (Ref: A044029 Rev. 5, dated 10.02.2011).	dated February 2011. Compliance with this FRA was expressly required by condition 9 of the outline planning permission granted on 23 January 2013, Ref. LU/47/11/, which states that the development shall only be carried out in accordance with the approved FRA. Although the reserved matters application was resubmitted and subsequently approved on 20 March 2026 under Ref. LU/263/25/RES, the description of development confirms that the approval relates to reserved matters only, namely access, appearance, landscaping, layout and scale, following the outline approval of LU/47/11 for Southern Allotments. The 2026 reserved matters approval does not introduce or approve a new drainage strategy, nor does it supersede the drainage principles secured under the outline permission. The drainage elements therefore remain governed by the approved outline FRA and associated outline drainage			
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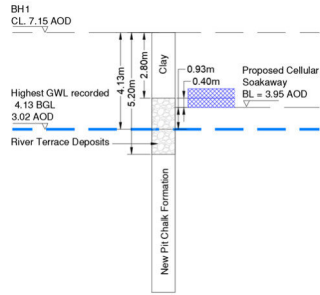
		documents. The National Standards for Sustainable Drainage Systems came into force at the end of July 2025, more than 12 years after the outline permission was granted. They should not therefore be applied retrospectively to drainage matters already established and secured through the outline approval. Copies of the decision notices for both LU/47/11/ and LU/263/25/RES are appended for ease of reference			
2.	The 1D model must use a CV=1 for both summer and winter events. Designer Response 26/11/2025 The summer and winter CV values have been set at 0.75 and 0.84, respectively, in accordance with the approved WYG Drainage Strategy (Ref: A044029 Rev.5, dated 10.02.2011), as shown in Appendix E.	Not accepted, please refer to WSCC/ADC requirements. Please note earlier reports and criteria therein are not approved, therefore the 1D modelling must comply with current criteria where CV=1. Comment outstanding. Designer Response 27/10/2026 Revised CV values to = 1, Please refer to updated calculations Network 1-v3	The revised calculation criteria is compliant regarding the CV, however the additional storage factors/MADD factors must be zero or proven otherwise. Comment outstanding. Designer Response 20/07/2026: MADD Factor (Additional storage in the simulation settings) revised to = 0 Please refer to updated calculations Network 1-v4.	Noted. Comment closed.	

3.	Drain down time is set to 240min and must be corrected. Please summarise the half drain down time to 50% for each storage feature for 24hr period. This shall be illustrated for 10yr, 30yr, 100yr. Please note that current standards minimum compliance is required for at least the 30 yr + CC (40%) storm. However, as the scale and layout of the site was agreed prior to this guidance being published we will honour the previous minimum requirement of half drain of the 10yr+CC (45%) storm within 24 hours if necessary. Designer Response 26/11/2025 For the half drain time of the soakaway, please refer to Network1-v2 – Approval Results for the 10-year, 30-	The results are accepted, however must be updated for comment 10. Comment outstanding. Designer Response 27/105/2026 Please refer to updated calculations, Network 1-v3 – Approval Results for the 10-year, 30 year, and 100-year storm events.	The revised calculations confirm the half drain times to be 1439mins which is acceptable. Comment closed.		
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	year, and 100-year storm events.				
4.			The Soils geotechnical report has now been provided which verifies groundwater monitoring and soil types. The designer has advised the groundwater datum of 3.02m AOD for design to enable the compliant 1.0m freeboard to be verified. It is not clear how this figure has been determined. The design states the base of the soakaway must penetrate a minimum 400mm into the River Terrace Deposit stratum, which may conflict resulting in a 1.0m freeboard non-compliance. Please provide an explanation and/or updated design if necessary. Designer Response 20/07/2026:	Noted. The marginal breach of the 1.0m freeboard is accepted as a very minor relaxation as summarised by the designer. Comment closed.	

			The highest groundwater level recorded at BH1 was 4.13m below ground level. Based on the conservatively interpolated cover level at BH1 of 7.15m AOD, this corresponds to a peak groundwater level of 3.02m AOD. Please refer to the supplementary sketch below. The soakaway formation level has been lowered by 100mm to achieve a minimum 400mm penetration into the River Terrace Deposits, encountered at approx. 4.35m AOD. This penetration is necessary to provide adequate hydraulic contact with the permeable stratum and achieve compliance with the required half-drain time. A higher formation level would reduce the penetration into the River Terrace Deposits and would not satisfy the hydraulic performance requirements.		
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			The resulting separation between the soakaway formation level and the highest recorded groundwater level is 930mm. Whilst this is 70mm below the recommended minimum 1.0m separation, the shortfall is considered marginal. The adopted groundwater level is based on the highest recorded monitoring result and therefore represents a conservative design scenario. All other recorded groundwater levels provide in excess of the recommended 1.0m separation. The proposed formation level therefore provides the maximum practicable separation above groundwater while maintaining the minimum penetration into the River Terrace Deposits required for effective infiltration. Given the minor nature of the shortfall and the conservative use of the highest recorded		
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			groundwater level, the residual risk of groundwater interaction is considered to be low. 		
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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.

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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: 16 September 2026 13:57
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: LU/141/26/DOC

Please find enclosed our consultants response, recommending discharge of condition.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Our priorities...



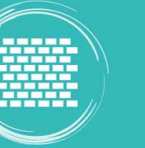
Improving the wellbeing of Arun



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: 29 July 2026 12:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: LU/141/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LU/141/26/DOC
Registered: 15th June 2026
Site Address: Southern Allotments Hampton Park Littlehampton

Grid Reference: 503134 103701
Category: Discharge of Condi
Description of Works: Approval of details reserved by condition imposed under LU/47/11 relating to condition 10-surface water drainage.

I am able to inform you that I have received an amendment to the above application dated 23rd July 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 **12th August 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
Hannah Kersley

Planning Case Officer-Arun District Council

Telephone: 01903 737856

Email: hannah.kersley@arun.gov.uk

PLRECON_DOC (ODB) 2020