

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/185/25/DOC	Reviewer Reference:	ADC/EXT2/D2134/83
Planning Officer:	Silvie Steiningerova	Date of Review:	22/10/2025
Site Name:	Land West of Holly Drive Littlehampton		
Application Description:	Approval of details reserved by condition imposed under LU/47/11/ relating to condition 10-surface water drainage (see LU/184/25/DOC for approval of details reserved by condition imposed under LU/47/11/ relating to conditions 21-Ecological Management Plan, 22-Construction Method Statement, 23-details of construction compound and 26-Roads Construction Programme).		
Assessment Number:	1 of 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: 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 No evidence to support strategy.	Objection
2. Interception drainage	Insufficient No evidence to support strategy.	Objection
3. Extreme Rainfall and Flooding	Insufficient No evidence to support strategy.	Objection
4. Water Quality	Insufficient No evidence to support strategy.	Objection
5. Amenity	Insufficient No evidence to support strategy.	Objection
6. Biodiversity	Insufficient No evidence to support strategy.	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient No evidence to support strategy.	Objection

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Reviewed Plans

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

- GENERAL DRAINAGE LAYOUT 519.1.VCE.0500 REV T2
- DRAINAGE LAYOUT SHEET 1 OF 2 519.1.VCE.0501 REV T2
- DRAINAGE LAYOUT SHEET 2 OF 2 519.1.VCE.0502 REV T2
- PRIVATE DRAINAGE CONSTRUCTION DETAILS SHEET 1 OF 2 519.1.VCE.0505 REV T2
- PRIVATE DRAINAGE CONSTRUCTION DETAILS SHEET 2 OF 2 519.1.VCE.0506 REV T2
- HIGHWAYS DRAINAGE LONGITUDINAL SECTIONS AND MANHOLE SCHEDULE 519.1.VCE.0511 REV T1
- DRAINAGE CALCULATIONS

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.
2. Insufficient information has been submitted for us to be able to determine if the surface water drainage design within the proposed scale, layout and landscaping of the development is achievable without increasing flood risk on site or elsewhere. The submission fails to demonstrate compliance with national guidance like the national standards for SuDS (see above sections) or The SuDS Manual.
3. Fundamentally supporting information has not been supplied to evidence the ground investigations (infiltration testing & groundwater monitoring).

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/185/25/DOC Site Name: Land West of Holly Drive Littlehampton	Initial Issue Date: 22.10.2025 Issue Date: 22.10.2025 Reviewer Reference: ADC/EXT2/D2134/83
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Summary and Recommendation:

Condition 10: **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:					
Condition Number: 10					
Comment Number					
1.	Firstly there is some uncertainty we are in receipt of all relevant information from the DOC application as it appears that other historic information for other planning applications has not been provided. The applicant must ensure ALL relevant information is provided for each new application. Please provide a copy of the FRA report and subsequent drainage strategy and/or design.				
2.	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.				
3.	Please provide a site plan / topographic survey detailing the historic overland flow routing.				
4.	Please provide a site plan / levels design detailing the post completion overland flow routing.				
5.	Please provide calculations for QBAR and confirm that the cumulative discharge rate is representative of the developed areas that are being positively drained.				
6.	Please provide a copy of your final hydrological/geotechnical assessment report inclusive of groundwater monitoring. Whilst the design makes some reference to a LEAP report, please provide				

	suitable evidence to demonstrate the seasonal peak and freeboard to the soakaway.				
7.	Further to the above please provide evidence of compliant BRE365 infiltration testing.				
8.	Please qualify drainage design methodology i.e. BRE365/CIRIA and application of safety factors to inform the design rates. Current value of 2 does not align with any guidance.				
9.	The 1D model must include a supporting plan to denote all nodes/links or cascade approach.				
10.	The 1D model must use a CV=1 for both summer and winter events.				
11.	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.				
12.	Cellular storage criteria does not match drainage plan and details sheet 2 size. This must also correlate with the supplier product being specified.				
13.	Construction details sheet 1 shows a type B manhole which is not used, please remove any details not relevant to the scheme.				
14.	Please include a standard detail for the PCC ring catchpit and qualify the base sump depth.				

15.	Drawing 511 illustrates the longitudinal sections, however the S1 section does not show the sump or connection to the soakaway.				
16.	Please review if one catchpit is sufficient and qualify CIRIA treatment compliance. What measures will be taken to intercept oils, hydrocarbons etc.				
17.	Please provide a supporting drawing to demonstrate the elevation design, low points, crossfall and exceedance flows.				
18.	Please provide a supporting drawing to identify the catchment area cited in the calculations and relevant gully design/spacing.				
19.	Construction details sheet 1 shows yard gullies with B125 grade covers which may not be suitable at this location.				
20.	Construction details sheet 1 describes the cellular soakaway as a trench which is not accurate.				

	The backfill material is not accurate and may be insufficient for vehicular loading. Please update and where necessary provide further plan drawings to verify surface finishes (pavements & landscaped areas). The plan advises the soakaway base must penetrate certain layers however this is not qualified on this detail.				
21.	Additional surface collection features may be necessary to mitigate the risk of runoff entering the Public Highway and visa vera.				

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.

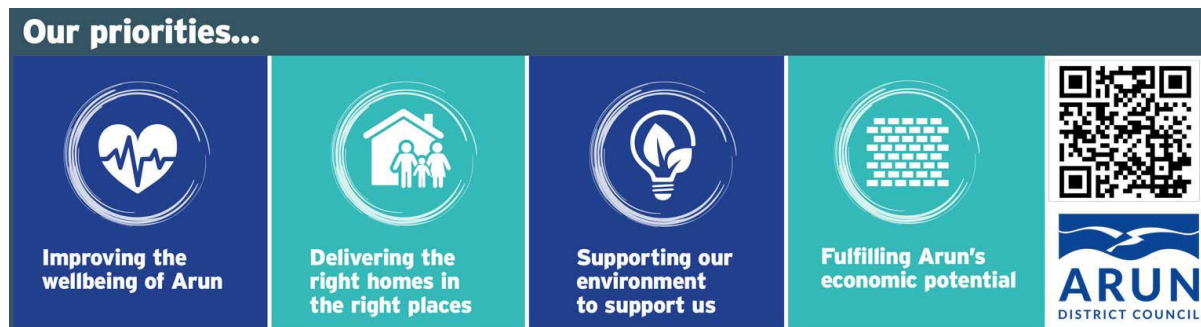
[REDACTED]

Drainage Engineers response

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

To register to receive notifications 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: 27 October 2025 13:33
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Jessica Riches <Jessica.Riches@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/185/25/DOC

Please find enclosed our external consultants response, an objection.

Regards

Paul Cann

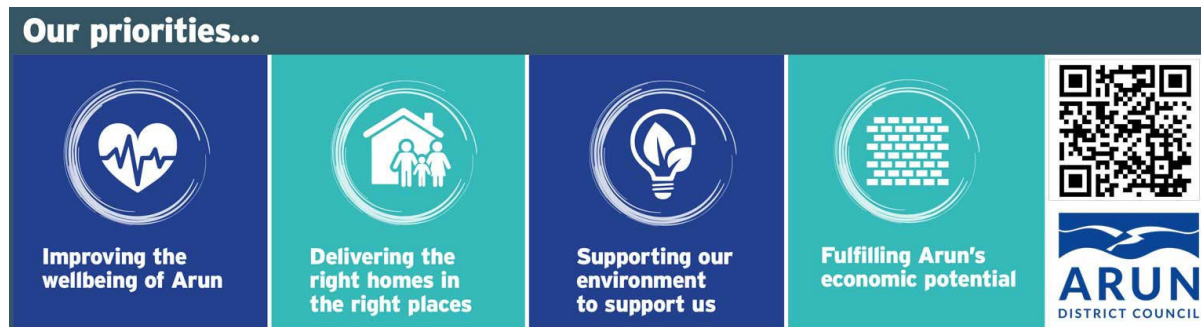
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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: Friday, September 5, 2025 7:48:35 AM (UTC+00:00) Monrovia, Reykjavik

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: LU/185/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LU/185/25/DOC

Registered: 4th September 2025

Site Address: Land West of Holly Drive Littlehampton

Description of Works: Approval of details reserved by condition imposed under LU/47/11/ relating to condition 10-surface water drainage (see LU/184/25/DOC for approval of details reserved by condition imposed under LU/47/11/ relating to conditions 21-Ecological Management Plan, 22-Construction Method Statement, 23-details of construction compound and 26-Roads Construction Programme).

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 **19th September 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

Jessica Riches

Planning Case Officer- Arun District Council

Telephone: 01903 737852

Email: jessica.riches@arun.gov.uk

PLCONDOC (ODB) 2020