

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/20/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hannah Kersley	Date of Review:	11/03/2026
Site Name:	Land North of Littlehampton Academy Littlehampton		
Application Description:	Approval of details reserved by conditions under LU/299/22/PL relating to condition 18- drainage verification. (See application LU/18/26/DOC for conditions 20 - lighting & 21- EV charging.)		
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 18: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	N/A	
2. Interception drainage	N/A	
3. Extreme Rainfall and Flooding	N/A	
4. Water Quality	N/A	
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:

- Surface Water Drainage Completion Report January 2026. Ref: 11643, uploaded in 3 parts via the public planning portal
- CCTV Report - Proline Drainage Ltd
- Photo Proline drainage

Condition wording

Condition 18 is worded as follows:

"Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall be submit for approval by the Local Planning Authority with as-built drawings of the implemented scheme together with a completion report

prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose.

Reason: To ensure that the proposed development is satisfactorily drained and in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun 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/20/26/DOC Site Name: Land North of Littlehampton Academy Littlehampton	Initial Issue Date: 05/02/2026 Issue Date: 11/03/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 18: **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		
Date:	05/02/2026	03/03/2026	11/03/2026		
Condition Number: 18					
Comment Number					
1.	Note - The information provided for the main soakaways and the plot drainage and permeable driveways for Phase 1a (Plots 1-12) is sufficient to evidence those elements are installed substantially in accordance with the approved drainage design.	<i>Thank you and noted.</i>	Comment closed.		
2.	CCTV survey should be provided for the main drain runs and confirmation of remedial works if required should be provided.	<i>A CCTV drainage survey has been undertaken, the report for which is provided in the revised Surface Water Drainage Completion Report for Plots 1 to 12 (Second Issue).</i>	Several of the pipe runs are noted as 'survey abandoned, unable to push'. There are also pipes with cracks, fractures and displaced joints. Some analysis of defects is required to conclude there is no requirement for remedial works. The risk of		

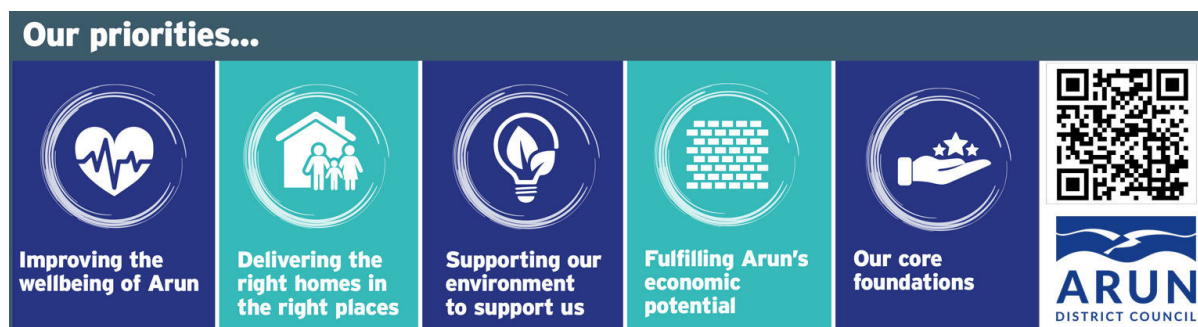
			groundwater ingress should be considered. Grade 4/5 structural defect pipes should be repaired.		
3.	The planning condition is for the whole site. This includes permeable pavement storage areas, filter strips, rain gardens and swales, which are not currently evidenced.	<i>The permeable paved driveways are evidenced in Appendix D. This particular submission is for part discharge of Condition 18 to allow Phase 1a occupation (Plots 1 – 12) only. These plots can be occupied without the filter strips, rain gardens and swales being completed. These drainage elements are connected to a road which has not been finished.</i>	There is some evidence of permeable driveways provided by the photos are generic and not geolocated / referenced to plots. The case officer will need to determine whether the shared SuDS elements in the roads need to be closeted in order to allow partial discharge. The completion of these elements should be evidence prior to the majority of the properties the shared infrastructure services are occupied. A phasing plan for partial discharges of condition 18 indicating which phase the streets will be incorporated would be beneficial.		

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.

PL- Consultation- Engineers response

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

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<https://www1.arun.gov.uk/planning-application-finder>



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From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 16 March 2026 15:11

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/20/26/DOC

Please find enclosed our consultants response in respect to condition 18.

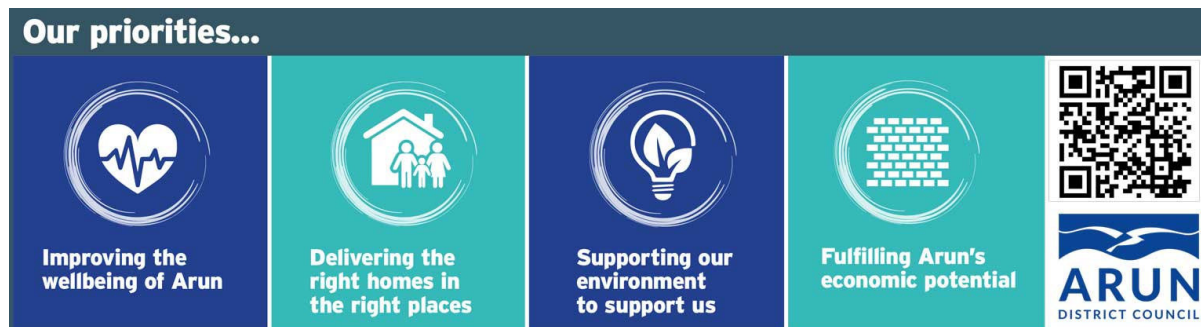
Regards

Paul Cann

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: 03 March 2026 16:04

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

Subject: Planning Re-Consultation on: LU/20/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LU/20/26/DOC
Registered: 27th January 2026
Site Address: Land North of Littlehampton Academy Littlehampton
Grid Reference: 503192 103180
Category: Discharge of Condi
Description of Works: Approval of details reserved by conditions under LU/299/22/PL relating to condition 18- drainage verification. (See application LU/18/26/DOC for conditions 20 - lighting & 21- EV charging.)

I am able to inform you that I have received an amendment to the above application dated 2nd March 2026 relating to: Additional drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **17th March 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

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Email: hannah.kersley@arun.gov.uk

PLRECON_DOC (ODB) 2020