

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/22/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Davis	Date of Review:	07/05/2026
Site Name:	Parcel Of Land 254 Pagham Road Pagham PO21 3PY		
Application Description:	Approval of details reserved by condition under P/178/21/OUT (Appeal APP/C3810/W/22/3302023) relating to conditions 12- Surface Water Drainage, 13- Watercourses and 14- Maintenance & Management of Surface Water Drainage.		
Assessment Number:	3		

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 12: No objection Condition 13: Further information required Condition 14: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection
4. Water Quality	Compliant	No objection
5. Amenity	N/A	
6. Biodiversity	N/A	
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 discharge of conditions, uploaded in 5 parts via public planning portal
- SUDS Management and Maintenance Plan February 2026
- Comment Tracker MC Comments v2
- Email correspondence relating to discharge of drainage conditions report 22.4.26

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 12:

- Mayer Brown Discharge of Conditions report dated April 2026 (11th Issue) - uploaded in 5 parts via public planning portal date 24-04-26

The following plans/documents should be listed as approved in respect to condition 13:

- N/A

The following plans/documents should be listed as approved in respect to condition 14:

- Mayer Brown SUDS Management and Maintenance Plan February 2026 (5th Issue)

Condition wording

Condition 12 is worded as follows:

"No development shall 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 dwelling 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."

Condition 13 is worded as follows:

"No development shall commence until details have been submitted to and approved in writing by the local planning authority for any proposals to discharge flows to watercourses, or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre development run-off values and in accordance with current policies. No construction is permitted that will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site"

Condition 14 is worded as follows:

"No development shall 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."

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: P/22/26/DOC Site Name: Parcel Of Land 254 Pagham Road Pagham PO21 3PY	Initial Issue Date: 13/03/2026 Issue Date: 07/05/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 12: **No objection**

Condition 13: **Further information required**

Condition 14: **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:	13/03/2026	13/04/2026	24/04/2026	07/05/2026	
Condition Number: 12					
Comment Number					
1.	Runoff Destination – The drainage layouts should include residential water butts. Designer Response 31/03/2026 Water butts are now included on all suitable garages, and are shown on the drainage plans in Appendix H.	Water butts should be included for all individual properties and can be included on houses as well as garages.	Water butts have been incorporated for each individual dwelling, located either on the house or on the garage, as appropriate. The updated drawings are contained within Appendix H of the Technical Note.	Comment Closed.	
2.	CCTV of existing culvert – Appendix U appears to end at the contents page of the CCTV survey, please provide the whole appendix for review.	The CCTV survey is acceptable. Comment Closed.			

	Designer Response 31/03/2026 Appendix U is now provided within the Discharge of Conditions Technical Note.				
3.	Works to existing culvert - There is no Appendix W locatable on the planning file Designer Response 31/03/2026 Appendix W is now provided within the Discharge of Conditions Technical Note	The remedial works shown in Appendix W are acceptable. Comment Closed.			
4.	Interception Drainage - There is no Appendix X locatable on the planning file. Please provide assessment which meets NSfS. Designer Response 31/03/2026 Appendix X is now provided within the Discharge of Conditions Technical Note.	It is noted that both the Outline Planning Consent and Reserve Matters Consent were issued before the release of the NSfS (First issued 19/06/2025). However, the SuDS Manual and ADC SuDS guidance at the time included interception drainage to capture the first 5mm of rainfall, and are specifically referenced in the condition wording. Discharge to ground is not a viable method and therefore the permeable paving does not provide interception drainage for the whole drained area. Attenuation basin and swales are incorporated in to the main	A response to this comment has been provided in the form of a supporting letter, included within Appendix AC of the Discharge of Conditions (DOC) report. The letter sets out our understanding of the Outline Consent and the standards at the time, alongside calculations demonstrating that the proposed design achieves 4.34mm of the 5mm interception requested by Arun DC.	The circumstances of planning consent being granted prior to the NSfS and the plan layout determined and conditions applied based upon that plan layout, together with the calculation now produced which is close to achieving the standards within the guidance of the time, including the ADC sustainable drainage checklist, the design is acceptable. Comment Closed.	

		drainage, together with large areas of lined permeable paving, but are unlikely to make up the required length / area to comply with Standard 2. No calculations are provided to demonstrate retention of the first 5mm rainfall or establish the shortfall. The plan layout is determined by the Reserve Matters consent, which limits the space available for surface features. A calculation should be provided to quantify the shortfall in the design (either plan area not provided or total mm provided for if 5mm not achievable) and a plan should be produced to present the opportunities for including additional features where possible within the physical constraints, eg raingardens, filter strips, small swales, planters. This may achieve interception drainage, or form the basis for a proposed departure from standard. Guidance is provided on ADC webpages here; SuDS general design guidance Arun District Council			
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5.	Note. The peak outflow rate estimated at outline stage has not been updated to the impermeable area (which has increased from 1.78ha to 2.48 ha including basin surface). This is not in accordance with ADC and NSfS standards. However, retaining the previous peak flow rate is in this case robust and reduces downstream flows. Therefore there is no objection to this approach. Designer Response 31/03/2026 Agreed, no action required				
6.	Risk of floatation to basins - There is no Appendix Y locatable on the planning file. Please provide assessment which demonstrates acceptable risk of floatation. Designer Response 31/03/2026 Appendix Y is now provided within the Discharge of Conditions Technical Note.	The assessment of land drainage as mitigation for risk of floatation of the basin liner is acceptable. Comment Closed.			
7.	Landscaping – a landscaping design which is coordinated with the drainage design should be submitted.	Landscaping designs noted, may need further coordination following response to comment 4 above.		Comment Closed.	

	Designer Response 31/03/2026 Appendix AB contains the coordinated landscape proposals with all trees located outside of the 3m easement zones for the basins and ditches as requested, and in consideration with wider drainage infrastructure				
8.	Formation Levels of permeable paving attenuation blanket are not clear, please highlight the plans which define depths and levels of subbase storage. Designer Response 31/03/2026 Appendix T contains the updated permeable paving formation level drawing which includes the formation level to ordnance datum, the overall construction thickness of the permeable paving and the reference to the construction details which evidence this information.	Formation depths are now shown on separate layout plans, however this cannot readily be audited and we are not able to confirm the calculations match the designs. As a drainage feature, the permeable paving with reference to the calculations ('PP' nr. 'PPD' nr.), formation level and depth of storage, should be included on the drainage layouts. Please add depth of storage in the calculations to ensure surface layers are excluded.	The formation levels drawing (Appendix T of the DOC report) now shows subbase storage depths (not including the surface layers) and the permeable paving model reference (which is stated on the drawing as Proposed Permeable Paving X and relates to the PPX in the calculations). This should now allow for easy referencing between the permeable paving drawings and the calculations. This permeable paving extents have not been added to the drainage layouts, as it would make it extremely busy and difficult to read. The permeable paving is a construction treatment	Formation levels are shown and PP references added. Checks with calculations acceptable. Comment Closed.	

			(i.e. road build up) so is included on the site layout drawings (with all other construction treatments). All drains associated with the permeable paving are included on the drainage drawing, and drawings should be read in conjunction with each other as this is a detailed design package of information. There are detailed details and sections demonstrating how the design all links together.		
9.	Permeable Paving - There is no Appendix V locatable on the planning file Designer Response 31/03/2026 Appendix T contains the updated permeable paving formation level drawing which includes the formation level to ordnance datum, the overall construction thickness of the permeable paving and the reference to the construction details which evidence this information.	Comment closed.			

10.	Construction details – the design / product reference for the flow control device should be shown. Designer Response 31/03/2026 The hydrobrake product number is now included on the hydrobrake detail in Appendix K. In addition to this, we have obtained the detail directly from Hydro International which is also included in Appendix K	Comment closed.			
11.	The max water level does not allow for 300mm freeboard in the basins, the adjacent ground level should be increased. Designer Response 31/03/2026 The top of bank level has now been increased to ensure 300mm of freeboard is provided as requested. This is evidenced in the calculation in Appendix I which shows the top of bank level as 4.863mAOD and the top water level of 4.561mAOD. This is consistent with the updated drainage and levels plans in Appendix H and Appendix T respectively.	Comment closed.			

12.	A flap valve or similar should be installed at the outlet to prevent surcharge water flooding the basins. Designer Response 31/03/2026 A flap non-return valve is now included on the outfall to the ditch as requested. This is evidenced on the drainage plans in Appendix H and the Sections drawings in Appendix S.	Comment closed.			
13.	It is not clear whether the EA requirement for FFLs to be 300mm above design flood level is achieved in the design. This should be made explicit in the report Designer Response 31/03/2026 All proposed floor levels are in excess of 300mm above the maximum defended flood level of 3.88mAOD, with the minimum floor level being 5.35mAOD. This is evidenced in Paragraph 2.7 of the report	Comment closed.			
14.	The Drainage Layouts do not currently show Exceedance Routes.	Comment closed.			

	Designer Response 31/03/2026 Appendix O containing the Exceedance Flow Plans is now provided within the Discharge of Conditions Technical Note				
Condition Number: 13					
Comment Number					
1.	Please provide confirmation of OWC consent. Designer Response 31/03/2026 West Sussex County Council as the LLFA have confirmed that OWC is not required. This is evidenced in paragraph 4.9 and Appendix Z of the report.	In the case of no requirement for OWC, consent will be required under Arun Land Drainage Byelaws. Confirmation of approval will need to be submitted with the resubmission. Forms and guidance notes can be found on ADC webpages here; Land drainage byelaws for landowners Arun District Council		Awaiting confirmation of ADC Bylaw consent.	
2.	Note - This condition cannot be discharged before Condition 12. Designer Response 31/03/2026 Noted, no action required				
Condition Number: 14					
Comment Number					
1.	The MMP needs to be a stand-alone document not	Comment closed			

	appended to a discharge of conditions report Designer Response 31/03/2026 The Management and Maintenance Plan is now provided as a standalone document, whilst still being included in Appendix L of the discharge of conditions Technical Note.				
2.	Update to approved drainage and details plans noting comments on Condition 12 above as necessary. Designer Response 31/03/2026 We can confirm that the drawings and details contained within the Management and Maintenance Plan reflect the updates as a result of these comments.	Comment closed			
3.	Note - This condition cannot be discharged before Condition 12. Designer Response 31/03/2026 Noted, no action required	Update to final drainage plans	Final drainage plans have now been included in the Management and Maintenance Plan to reflect the above comments.	Comment Closed.	

PL- Consultation- Engineers response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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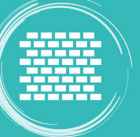
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 May 2026 11:19
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: P/22/26/DOC

Please find enclosed our consultants response, recommending discharge of conditions 12 and 14, but not 13.

It should be noted that noted that the outcome of resolving condition 13 may or may not impact the surface water drainage scheme (condition 12).

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 24 April 2026 12:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: P/22/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	P/22/26/DOC
Registered:	20th February 2026
Site Address:	Parcel Of Land 254 Pagham Road Pagham PO21 3PY
Grid Reference:	489141 99122
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition under P/178/21/OUT (Appeal APP/C3810/W/22/3302023) relating to conditions 12- Surface Water Drainage, 13- Watercourses and 14- Maintenance & Management of Surface Water Drainage.

I am able to inform you that I have received an amendment to the above application dated 22nd April 2026 relating to: Amended Drainage Discharge Report, Management Plan and Comment Tracker

If you should wish to make further representations as a result of this amendment, please make any further comment by **9th May 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

Mr S Davis

Planning Case Officer-Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLRECON_DOC (ODB) 2020