

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/23/26/DOC	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Hannah Kersley	Date of Review:	10/04/2026
Site Name:	Land north of Hook Lane Pagham PO21 3PD		
Application Description:	Approval of details reserved by condition under P/149/23/S73 relating to condition 12(b) - SuD's scheme.		
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 12b: 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Not applicable	No objection
2. Interception drainage	Not applicable	No objection
3. Extreme Rainfall and Flooding	Not applicable	No objection
4. Water Quality	Not applicable	No objection
5. Amenity	Not applicable	No objection
6. Biodiversity	Not applicable	No objection
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:

- Drainage Verification Report February 2026 Rev P3, uploaded in 26 parts via the public planning portal
- ADC Drainage Comments 21.11.2025

Condition wording

Condition 12b is worded as follows:

"A) Prior to occupation of any part of the development, details of the phasing arrangements for the approved surface water drainage design must be submitted and approved in writing by the Local Planning Authority. Each drainage design phase of development must be able to operate in isolation from later phases

B) Immediately following implementation of the approved SuDS scheme for each drainage design phase agreed under part a) of this condition and prior to occupation of any part of the development within that phase, the developer/applicant shall submit and have approved by the local planning authority as-built drawings of the fully 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. There shall be no deviation to the approved scheme other than with the written consent of the Local Planning Authority. The scheme shall thereafter be maintained in perpetuity.

Reason : To ensure that the proposed development is satisfactorily drained 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.
2. Discharge of condition 12b for the Vistry parcel is dependent upon prior discharge of the same condition for the watercourse catchment and basin 3 by Bellway. This is an explicit expectation of the approved phasing plan (which the author refers to).
3. Basin 3 and the watercourse were included in the verification report submitted to support application P/32/26/DOC. The review of this application has been delayed until the review of P/32/26/DOC to maximise the possibility of a positive determination. Unfortunately, the verification of basin 3 and the watercourse are inadequate and an objection has been lodged.
4. Notwithstanding the issues with regards to the downstream network which must be verified before the Vistry parcel, there are inadequacies with this application which mean that even if the watercourse and basin 3 had been verified an objection would still be lodged. Critically some of the cover levels remain unverified and CCTV surveys for the pipework do not cover the full network.

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/23/26/DOC Site Name: Land north of Hook Lane Pagham PO21 3PD	Initial Issue Date: 10/04/2026 Issue Date: Reviewer Reference: ADC/EXT4b
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Summary and Recommendation:

Condition 12b: **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:	15/08/2025	21/11/2026	20/02/2026	10/04/2026	
Condition Number: 12b					
Comment Number					
1.	This current phase relies on the downstream infrastructure being installed and the condition approved. The CTP SuDS verification report does not provide clarity as to whether the downstream infrastructure has been fully installed and whether this part of the condition has been cleared. From a review of the planning portal it would appear to still be outstanding. Reference should be made to Part A of condition 12 which refers to the catchment which needs	The SuDS Verification Report, Odyssey April 2025 referred to on the downstream SuDS infrastructure has not fully address the planning condition under application P/58/25/DOC which was refused. As such until the downstream SuDS verification report adequately addresses the above condition then the CTP SuDS verification report cannot be concluded. It should be noted that the Odyssey April 2025 report did not provide an as-built confirmation of the	This report is to address Vistry Catchment Area 1 of which the SUDs basin is Bellway's esponsibility which they have confirmed is complete andhave supplied the relevant as builds for. The Phase 1 Watercourse Catchment Area sits entirely within Bellway's site and is completely their responsibility. All the drainage to our site is complete.	At time of submission there had been no application submitted to verify SuDS Basin 3. This has since been made and the application does not adequately verify the basin. Vistry's parcel is reliant upon this basin and the connection to the watercourse being constructed correctly and as such this condition cannot be discharged until it has been. This is an explicit expectation of the approved phasing plan. (It is noted that pipe diameters are incorrect, the basin levels are lower than approved and there is no record of the	

	to be verified as a whole to support this particular part of the site Designers Response 22/09/2025 CTP's original report provided as built photos of Basin 3 in Appendix F. Since that report, CTP has been provided with a copy of the SuDS verification report for the Bellway site, by Odyssey dated April 2025 reference 24-334, which confirms that the whole of the downstream SuDS infrastructure, into which the Vistry site discharges, has been constructed as the approved planning drawings. As built topographical surveys have been provided to CTP which confirm that Basin 3 has been constructed to the original approved drainage drawings by Brookbanks. This new information is provided Appendix G1	SuDS basins which are critical to the upstream networks.		downstream hydrobrake being installed.)	
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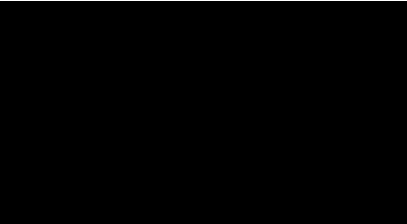
2.	The drawings provided in Appendix A and B are classed as "Asbuilt" drawings. The drawing status on both the Withers Design and Brookbanks drawings are all "Construction" status and do not appear to be as-built. As built drawings need to be provided, or confirmation from the Contractor or Developers that these drawings are "as-built" for records Designers Response 22/09/2025 Vistry has requested the 'as built' versions, however these will be available until after the 5th September, due to Withers current workload. However, the groundworker Baram has confirmed via email that the drainage was installed in accordance with the latest Withers construction drawings in Appendix A, apart from a A copy of this email is located in Appendix G2.	Noted and item closed			
3.	The CCTV survey provided appears incomplete with	The completed survey is required, so this item is still outstanding	No response.	CCTV is still incomplete. Extents of areas covered are highlighted below.	

	extents from S215-S220 missing. Designers Response 22/09/2025 At the time of the original CCTV survey, access to these manholes was not available due to site activities. Vistry has requested that Baram returns to site to complete the survey, which will be forwarded once received and checked.			Construction debris noted in one of the manholes should be removed. No footage has been submitted. 	
4.	The CTP SuDS verification report seeks to address as built information for 88no.units but from the extent of as-built information as well as as-built photos it is not clear whether all this drainage infrastructure and plots have been completed. We would advise that the applicant provides a clear schedule of the plots which are completed with associated drainage installed as well as provide a further statement	As-built surveys are required for all main drainage serving the proposed no. of plots which the verification report is seeking to address. Ie. if its 88 plots then as-built survey covering the surface water drainage infrastructure serving these 88 plots need to be submitted.	The drainage for this scheme is now complete and the relevant surveys have been provided and included within the report	Cover levels are still not included for some of the manholes.	

	from the contractor confirming installation of drainage. Designers Response 22/09/2025 An annotated plan showing the plots which were not completed is provided in Appendix G3. However as stated in item 2 above Baram has confirmed that all of the drainage has been installed. In addition the site team has provided CTP with photos of these plots which show the private drainage. These photos are located in Appendix G4.				
5.				The author has not clarified what they deem to be acceptable construction tolerances.	
6.				The report relies on the contractor verifying their own work without verification by the author of as built levels or construction (inspections). The contractor is not impartial.	

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



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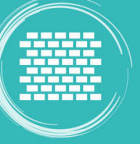
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 April 2026 11:24
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hannah Kersley <Hannah.Kersley@arun.gov.uk>
Subject: RE: Planning Consultation on: P/23/26/DOC

Please find enclosed our consultants response, an objection.

Regards

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 26 February 2026 15:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/23/26/DOC

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/23/26/DOC
Registered: 20th February 2026
Site Address: Land north of Hook Lane Pagham PO21 3PD
Description of Works: Approval of details reserved by condition under P/149/23/S73 relating to condition 12(b) - SuD's scheme.

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 **12th March 2026**.

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

Hannah Kersley

Planning Case Officer- Arun District Council

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