

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/2/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Jessica Riches	Date of Review:	29/01/2026
Site Name:	Church Barton House Horns Lane Pagham PO21 4NZ		
Application Description:	Approval of details reserved by condition imposed under P/25/17/OUT relating to conditions 10-surface water drainage, 11-maintenance and management of surface water drainage system and 29-existing and proposed ground levels, proposed finished floor levels, levels of any paths, drives, garages and parking areas.		
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 10: Objection Condition 11: Further information required
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	N/A – Determined at Reserved Matters Stage	No objection
6. Biodiversity	N/A – Determined at Reserved Matters Stage	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:

- SW NETWORK 3
- SW NETWORK 1
- SUDS MAINTENANCE SCHEDULE
- APPENDIX E MAINTENANCE SCHEDULE
- APPENDIX, A SITE PLAN, APPENDIX B BOREHOLE LOGS, APPENDIX C MONITORING SHEETS, APPENDIX D PROPOSED DRAINAGE PLAN, CONTRIBUTING AREA PLAN, EXCEEDANCE FLOW ROUTES, PROPOSED SURFACE FINISHES AND LEVELS, EXCEEDANCE FLOW ROUTES, TYPICAL CONSTRUCTION DETAILS, GREENFIELD RUNOFF AND HYDRAULIC CALCULATIONS , AOPENDIX E MAINTENANCE SCHEDULE
- TYPICAL CONSTRUCTINO DETAILS SHEET, uploaded in 6 parts via public planning portal
- PROPOSED SURFACE FINISHES SHEET, uploaded in 4 parts via public planning portal
- EXCEEDANCE FLOW ROUTES 301 REVP-
- CONTRIBUTING AREA PLAN 201 REVP-
- PROPOSED DRAINAGE PLAN, uploaded in 6 parts via public planning portal

- APPENDIX C GI (EXTRACTS) AND WINTER GROUNDWATER LEVEL MONITORING REPORTS
- APPENDIX B BOREHOLE LOGS
- APPENDIX A SITE PLAN
- FOUL AND SURFACE WATER DRAINAGE REPORT

Condition wording

Condition 10 is worded as follows:

"Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the local planning authority, and shall include;

- The design should following 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. Winter groundwater monitoring to established highest annual ground water levels and percolation testing to BRE 365, or similar approved, will be required to support the design of any infiltration drainage.

- The development shall not proceed until formal consent has been approved in writing from the Lead Local Flood Authority (WSCC) or its agent (ADC) for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourses on the site. Any discharge of watercourse must be at a rate no greater than the pre-development run off values.

- Arrangements for future access and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site.

No building shall be occupied until the complete surface water drainage system serving it has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies D DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the surface water disposal scheme is agreed before construction commences and to protect existing watercourses prior to the commencement of development."

Condition 11 is worded as follows:

"Development shall not 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.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies D DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences"

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Comment 1 for Condition 10 is fundamental and will affect the design and increase onsite storage. The calculations will need to be reviewed again once this has occurred.

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: Site Name: Church Barton House Horns Lane Pagham PO21 4NZ	Initial Issue Date: 29/01/2026 Issue Date: 29/01/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 10: **Objection**

Condition 11: **Further information required**

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:	29/01/2026				
Condition Number: 10					
Comment Number					
1.	The report states that the peak outflow is based upon 3 l/s/ha for the whole site area and that this is in accordance with ADC guidance. This is incorrect, the site is greenfield land and peak outflow rates should be restricted to greenfield runoff for the drained area. For comparison, the design presented at Reserved Matters stage proposed a rate less than half the currently proposed rate. The per hectare GFR rate should be applied to the drained area.				

2.	The drained areas plan shows 1.850ha whereas the calculations include 1.815ha.				
3.	Design/calculations for meeting the NSfS Standard 2 – Inception Drainage should be provided.				
4.	Pond 3 has a side slope of 1:2 which is steeper than the gradient recommended by guidance and raises issues of safety and slope stability.				
5.	A construction detail for the outlet headwall at the basins should be provided and should include measures to reduce risk of blockage at the flow control chambers.				
6.	Construction details should be provided for the flow control chambers and the flow control products clearly identified. Measure to prevent blockage and to lessen the impact of blockage should be incorporated.				
7.	The Mass Balance for Network 2 is not acceptable.				
8.	The surcharged outfall is not clearly modelled and the basis for design surcharge level is not set out in the report.				
9.	Proof of Ordinary Watercourse Consent from				

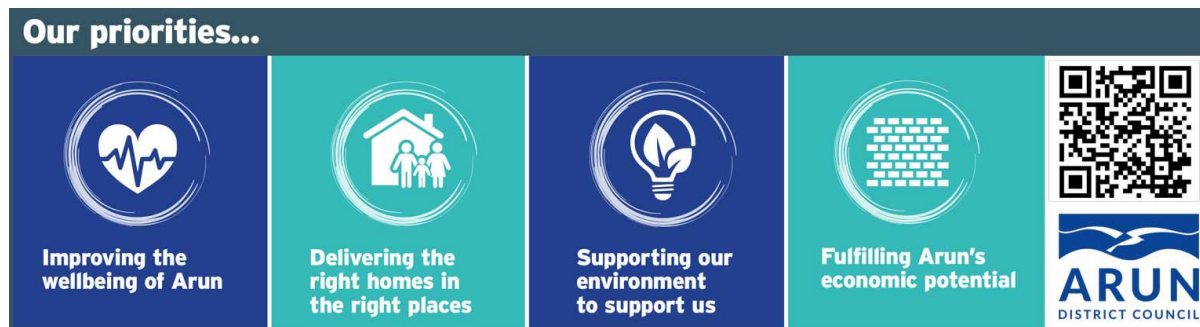
	the LLFA is required for the alterations to ordinary watercourses and headwall outlets. Outfall headwalls which do not protrude into the watercourse will not require an OWC but will require Land Drainage Byelaw Consent from ADC.				
Condition Number: 11					
Comment Number					
1.	The MMP should be a standalone document which provides information on the design and SuDS elements including a plan which highlights the locations. Guidance is provided on ADC web pages.				
2.	The MMP will need to be updated with the design changes in response to comments on C10 above.				

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

Sent: 14 January 2026 08:48

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

Subject: Planning Consultation on: P/2/26/DOC

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/2/26/DOC

Registered: 13th January 2026

Site Address: Church Barton House Horns Lane Pagham PO21 4NZ

Description of Works: Approval of details reserved by condition imposed under P/25/17/OUT relating to conditions 10-surface water drainage, 11-maintenance and management of surface water drainage system and 29-existing and proposed ground levels, proposed finished floor levels, levels of any paths, drives, garages and parking areas.

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 **28th January 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

Jessica Riches

Planning Case Officer- Arun District Council

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