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**From:** Simon Davis  
**Sent:** 12 May 2026 10:18  
**To:** 'Cleo Jefferies' [REDACTED]  
**Cc:** James Smith [REDACTED]  
**Subject:** RE: Pagham Phase 4b - Drainage Condition Comments

Dear Cleo,

I have had word from the EA that they agree the change to their condition. I await the LLFA response.

Kind Regards

Simon

**Simon Davis MRTPI**  
**Principal Planning Officer**, Directorate of Growth

**T:** 01903 737874  
**E:** [simon.davis@arun.gov.uk](mailto:simon.davis@arun.gov.uk)

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**From:** Cleo Jefferies [REDACTED]  
**Sent:** 08 May 2026 10:57  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Cc:** James Smith [REDACTED]  
**Subject:** Pagham Phase 4b - Drainage Condition Comments

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Hi Simon,

Please see the below table outlining the drainage comments and our drainage consultant's response.

| Consultee          | Proposed Condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Consultant Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Recommended Revised Wording                                                                                                                                          |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environment Agency | <p>The development shall be carried out in accordance with the submitted flood risk assessment (dated January 2026) and the following mitigation measures it details:</p> <ul style="list-style-type: none"> <li>- Finished floor levels shall be set no lower than 5.4 meters above Ordnance Datum (AOD).</li> <li>- Ground level raising shall be limited to development parcels within Flood Zone 1, to a maximum of 4.8 meters above Ordnance Datum (AOD).</li> </ul> <p>These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.</p> <p>The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.</p> | <ul style="list-style-type: none"> <li>• The FFLs clause is important.</li> <li>• The wording of the clause about max ground raising is unnecessary and possibly unhelpful. Raising may need to slightly exceed 4.8m AOD in places to achieve acceptable highway gradients and level access criteria. In places, the road and SuDS embankments need to be raised outside of the parcels. Really, is there a need to mention a raising limit? The developer will naturally seek to minimise the earthworks for cost and practical reasons.</li> </ul> | <ul style="list-style-type: none"> <li>• Suggest wording simplified to: <b>Ground level raising shall be limited to land within fluvial Flood Zone 1.</b></li> </ul> |
| WSCC LLFA          | <p>Condition 1:<br/> Prior to commencement of the development, detailed designs of a surface water drainage scheme shall be submitted to and agreed with the Local Planning Authority. This shall be in accordance with the approved Flood Risk Assessment, prepared by GTA Civils &amp; Transport, dated 29 January 2026, Ref: 13226A, Third Issue. The design shall follow the NPPF, PPG Flood risk and coastal change and National Standards for SuDS. The submitted details shall include:</p>                                                                                                                                                                                                                                                                 | <p>The detail is generally good as it makes clear what the submission must cover. However, Clause 10 would conflict with the EA's condition on min FFLs.</p>                                                                                                                                                                                                                                                                                                                                                                                         | <p>Suggest deletion of Clause 10.</p>                                                                                                                                |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|-------------------|
| <p>1. Surface water runoff rates will be attenuated to 3l/s/ha based on the proposed impermeable area, as stated within Chapter 5.7 and 7.5 of the FRA.</p> <p>2. Evidence that the surface water drainage system complies with the National Standards for SuDS for the management of everyday rainfall (interception).</p> <p>3. Details of all existing and proposed watercourses and sewers, including any proposed discharge points.</p> <p>4. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% and 1% annual probability rainfall events (both including allowances for climate change). Hydraulic calculations and detailed construction drawings shall be submitted to demonstrate this.</p> <p>5. Detailed drainage layout plan, which corresponds with the hydraulic calculations.</p> <p>6. An exceedance flow routing plan demonstrating no increase in surface water flood risk off site. The plan must include proposed levels and flow directions.</p> <p>7. Evidence that the surface water drainage system meets Standard 4-6 of the National Standards for SuDS.</p> <p>8. Construction method statement for the surface water drainage system and any ordinary watercourses within or adjacent to the site.</p> <p>9. Site-specific maintenance and management plan for all elements of the surface water drainage system and any ordinary watercourses/culverts within the development.</p> <p>10. Finished ground floor levels of residential properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.</p> |                                   |                   |
| <p>Condition 2:<br/>Upon completion of the surface water drainage scheme (or phase) and prior to the first occupation of the development (or phase), a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved and shall include as a minimum.</p> <p>1. CCTV survey of underground structures,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Condition 2 is reasonable.</p> | <p>No action.</p> |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|  | <p>2. A full set of “as built” drawings highlighting any minor changes to the approved drawings.</p> <p>3. Demonstration that vegetation has become established.</p> <p>4. Photographs of excavations (including soil profiles/horizons) and any installation of any surface water drainage structures and control mechanisms.</p> <p>5. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|  | <p>Condition 3:<br/>The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:</p> <ol style="list-style-type: none"> <li>1. A timetable for its implementation.</li> <li>2. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a non-technical labelled drawing showing where they are located and how to access them.</li> <li>3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.</li> </ol> | <p>Condition 3 is normal, but needs adjustment for potential phasing. Some of the clauses are unnecessary as the detail is already covered in Standard 7 or the preceding wording.</p> | <p>Condition 3:<br/>The development hereby approved shall not be occupied until details of the maintenance and management of the Sustainable Drainage Scheme (SuDS) in accordance with National SuDS Standard 7 have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme (or phase) shall be implemented prior to the first occupation of the development (or phase) hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. <del>The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development</del> [suggest delete this sentence, the LPA already has powers to inspect for planning compliance]. The details of the network in addition to those listed in SuDS Standard 7 to be submitted for approval shall include:</p> |

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|--|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  | <p>1. A timetable for its implementation.</p> <p>Unnecessary – the wording above already defines the timing and the Condition 2 submission will keep the LPA informed.</p> <p>2. Details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect [the preceding wording is covered by Standard 7] including a non-technical labelled drawing showing where they are located and how to access them.</p> <p>3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.</p> <p>[already covered by Standard 7] This will include the name and contact details of any appointed management company. "</p> <p>[The above consolidated to:]</p> <p>1. A non-technical labelled drawing showing where the SuDS components are located and how to access them.</p> <p>2. The name and contact details of any appointed management company</p> |
|--|--|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

I trust the above makes sense, but if you have any questions, please don't hesitate to contact James or I.

Kind regards  
Cleo

Cleo Jefferies | Assistant Planner

Working days: Mon, Wed, Thurs & Fri (Masters on Tues)

RIDGE

Ridge and Partners LLP    



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