

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/36/26/DOC	Reviewer Reference:	EXT2/02
Planning Officer:	Hannah Kersley	Date of Review:	02/06/26
Site Name:	Land North of Sefter Road & 80 Rose Green Road Pagham		
Application Description:	Approval of details reserved by condition under P/134/16/OUT as amended by P/34/25/NMA relating to condition 13B- Surface Water Drainage.		
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 13b: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	N/A	N/A
2. Interception drainage	N/A	N/A
3. Extreme Rainfall and Flooding	N/A	N/A
4. Water Quality	N/A	N/A
5. Amenity	N/A	N/A
6. Biodiversity	N/A	N/A
7. Construction, operation, maintenance, decommissioning and structural integrity	N/A	N/A

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- As Built Storm Water Drainage Survey - Regis Park, Sefter Road, Pagham, Bognor Regis. PO21 3EE, uploaded in 6 parts via the public planning portal
- Drainage Verification Report. March 2026, uploaded in 6 parts via the public planning portal

Plans/Documents to be listed as approved

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

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Condition wording

Condition 13b 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 demonstrate that it can function separately 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."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. **This application has been checked against the Arun District Council checklist for verification reports and the documents that have been submitted have been found to fall short of the requirements**

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/36/26/DOC Site Name: Land North of Sefter Road & 80 Rose Green Road Pagham	Initial Issue Date: 02/06/2026 Issue Date: 02/06/2026 Reviewer Reference: EXT2
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Summary and Recommendation:

Condition 13: 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:02/06/2026					
Condition Number: 13b					
Comment Number					
1.	The comments below are based on the verification report checklist published by Arun District Council and at this stage are intended to inform the applicant of the shortfalls of the submitted documents. Further comments may arise when the additional information is reviewed.				
2.	Verification Author Requirements: Details of professional indemnity insurance have not been provided.				
3.	Inspection Requirement: The report confirms that the no inspections were undertaken during construction and an inspection was carried out March 2026 in relation to works completed at that time.				
4.	Verification Report Contents: No clear statement that the author believes the constructed drainage system is adequate (it appears that the				

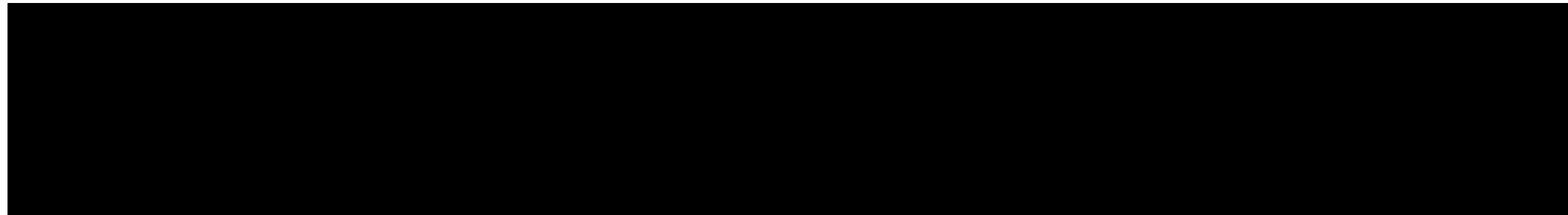
	construction was not complete at the time of inspection.				
5.	Verification Report Contents: No confirmation that no trees or landscaping have been located in areas that would be detrimental to the drainage infrastructure				
6.	Verification Report Contents: “Confirmation that where SuDS are subject ordinary watercourse land drainage consent or land drainage byelaw consent that the constructed works have been signed off by the relevant authority”. No documentation has been submitted in relation to the culverting to the existing watercourse for the site access.				
7.	Verification Report Contents: No confirmation that there has been no unauthorised land raising, watercourse infilling, culverting or watercourse alterations				
8.	Verification Report Contents: “As built’ Survey with drawings of suitable scaling, to include all relevant details discussed below” The as built survey is incomplete as it is missing information for some chambers and no levels are provided for the basins.				
9.	Verification Report Contents: “Commentary comparing the ‘as-built’ survey with the approved plans. This includes ground levels and pipe/structure				

	levels." The as built drawing confirm that some pipe invert levels are not as designed, this is not discussed in the report.				
10.	Verification Report Contents: "Commentary of the condition of all constructed components and compliance with the approved drawings". The commentary provided does not demonstrate that the SuDS features have been constructed correctly, other than what can be seen at surface level. Eg. it is not demonstrated that the cellular tanks have been installed to the correct size or level.				
11.	Verification Report Contents: "Confirmation of how key materials were verified" The following information has not been submitted: CCTV survey, source and test certificates for membranes, full planting list and confirmation of plant sources, certificate or receipts for components or materials				
12.	Verification Report Contents: It is not explained what the author has considered to be reasonable construction tolerances with reference to adoption or British Standards as appropriate				
13.	Verification Report Contents: Where variations have occurred, the report shall include supporting evidence to show that the as constructed drainage will meet policy requirements and that these variations have been reviewed and				

	approved by the designer, this have not been provided. It is noted that the basin levels are not consistent with the approved drawings.				
14.	Verification Report Contents: When full as built information has been obtained and reviewed, it will be necessary to describe and evidence how non-compliances were rectified with remedial works.				
15.	As-Built Drawings and Topographic Survey Pipe diameters and materials are not shown				
16.	As-Built Drawings and Topographic Survey Finished levels and surface type is not shown for roads, footpaths, drives and parking areas. Finished floor levels are not shown				
17.	As-Built Drawings and Topographic Survey Tank base levels, height, cover level and plan dimensions are not shown.				
18.	As-Built Drawings and Topographic Survey Permeable paving base levels, finished surface levels and depth of sub base are not shown				
19.	As-Built Drawings and Topographic Survey Flow control internal chamber dimensions are not shown				
20.	Certification				

	The author does not confirm that the contents of the report are correct and a true reflection of what happened on site.				
21.	Certification The statement when included will need to be signed and dated by the author				

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

To register to receive notification of planning applications in your area please go to <https://www1.arun.gov.uk/planning-application-finder>

Our priorities...



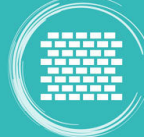
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations




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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 June 2026 14:45
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/36/26/DOC

Please find enclosed our consultants response – further information required.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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



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Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential




From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 29 April 2026 15:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/36/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/36/26/DOC
Registered: 7th April 2026
Site Address: Land North of Sefter Road & 80 Rose Green Road Pagham
Description of Works: Approval of details reserved by condition under P/134/16/OUT as amended by P/34/25/NMA relating to condition 13B-Surface Water Drainage.

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 **29th April 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

Telephone: 01903 737856

Email: hannah.kersley@arun.gov.uk