

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/36/26/DOC	Reviewer Reference:	EXT2/02
Planning Officer:	Hannah Kersley	Date of Review:	29/09/26
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:	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 (Chapter 18). 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

- 26-065-01A Drainage Verification Report
- Insurance Certificate - exp feb 2027
- Insurance Certificate - Confirmation of EL & PL
- Engineers comments August 26
- EMAIL 16.6.26 Correspondence between Taylor Wimpey, HK and ADC Drainage

Plans/Documents to be listed as approved

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

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.

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: 29/09/2026 Reviewer Reference: EXT2
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Summary and Recommendation:

Condition 13B: **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	ADC Drainage Comments		
Date:	02/06/2026	10/08/2026			
Condition Number:					
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.	To confirm the outline decision notice for this site is dated: 15th October 2019. The RM decision notice is dated: 28th October 2021. Original ADC SuDS verification guidance as far as we can tell was published by at least September 2024. And updated following new government SuDS standards in October 2025. Condition 13 was varied via an NMA to amend the wording of this condition to allow for a	Noted. Commented closed.		

		phased discharge approach in line with a more realistic construction timeline. Given this decision was dated 26th June 2025 and reference to SuDS verification Guidance was not noted in the new condition wording we have thus complied with the wording of the current Condition 13 Part B. Nevertheless, we have gathered and provided as much available information as possible in order to respond to these comments.			
2.	Verification Author Requirements: Details of professional indemnity insurance have not been provided.	Document now provided.	Noted. Commented closed.		
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.	No interim inspections were carried out by the third-party engineer as they were instructed to produce the completion report only as per the wording of the condition requirement. This has now been confirmed within the report section 1.1.3.	Noted. Commented closed.		

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.	Refer to 5.1.3 and 5.1.4 of the report submitted, it is confirmed the system is adequate and performing as expected following their inspection.	Noted. Commented closed.		
5.	Verification Report Contents: No confirmation that no trees or landscaping have been located in areas that would be detrimental to the drainage infrastructure	Refer to point 4.2.6 for conformation that no trees or landscaping is within adoptable easements or in areas where they would be detrimental to drainage infrastructure. Landscape drawings now included in the report Appendix B.	Noted. Commented closed.		
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.	The OWCs within these phases are yet to be signed off, works were completed and interim inspected but the remedials required have only just completed. Although sign-off for these works cannot be obtained at this stage to satisfy this element, progress is being made. Paul Cann will now be contacted to arrange the inspection and move this forward.	Noted. The verification protocol dictates that OWC works must be completed and signed off, however this can be closed out in due course. Comment closed.		
7.	Verification Report Contents: No confirmation that there has been no unauthorised land raising, watercourse infilling,	The engineer has not surveyed this element as it was a requirement to survey the surface water drainage and SuDS element only. The	The verification protocol dictates that OWC works must be completed and signed off, however this can be		

	culverting or watercourse alterations	statement provided in 5.1.4 confirms it is installed as per the approved drawings however, no watercourse infilling or alterations have occurred that are not approved. Hannah Kersley confirmed this is acceptable and comment can be closed via email on 16.06.26.	closed out in due course. Comment closed.		
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.	Bottom of basin levels now surveyed and included within the as-built of the revised report. Pages 193 and 194.	Noted. Commented closed.		
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.	Refer to point 4.2.3 and 4.2.4 within the verification report.	Noted. Commented closed.		
10.	Verification Report Contents: "Commentary of the condition of all constructed components and compliance with the approved drawings". The	Delivery ticket note included as evidence demonstrating that the number of crates were supplied matches what is	Noted. Commented closed.		

	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.	shown on the drawings. Page 198 of 210.			
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	CCTV has been provided for this phase.	CCTV data does not appear to have been received. Comment outstanding.		
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	Assuming reference to 4.2.4, construction tolerances refer to adoptable standards and Sewers for Adoption technical guidance.	The response for 4.2.4 is insufficient. Please clarify if pipe/sewer gradients noted to be flatter comply with BRegs and/or DCG guidance. Comment outstanding.		
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	The GW has confirmed no variations have occurred from the approved plans. Refer to section 4.2 for conformation this is the case when reviewing the as-built information.	Noting there are variations in basin levels, section 4.4 response is insufficient. This shall further clarify the variation, impacts of storage and freeboard from the 1D design.		

	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.		Comment outstanding.		
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.	Refer to As-Built survey. Private drainage inspected where access could be gained in occupied areas.	Noted. Commented closed.		
15.	As-Built Drawings and Topographic Survey Pipe diameters and materials are not shown	Refer to as-built survey. Information added.	This does not appear to have been updated. Comment outstanding.		
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	We have followed the requirement under the condition wording, 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	Noted. Commented closed.		

		implemented scheme, together with a completion report prepared by an independent engineer. The as-built surveys carried out post implementation survey the surface water and SuDS drainage system. Overlaid in the site plan, a full site survey of road levels etc is not referenced in the condition. Hannah Kersley confirmed this is acceptable and comment can be closed via email on 16.06.26.			
17.	As-Built Drawings and Topographic Survey Tank base levels, height, cover level and plan dimensions are not shown.	As per comment 10, delivery note included for the one attenuation tank onsite to evidence compliance with approved drawing. Unable to survey at this stage as installed a number of years ago prior to ADC SuDS guidance requiring installation to be documented.	Noted. Further evidence is required to conclude install to the design. Comment outstanding.		
18.	As-Built Drawings and Topographic Survey Permeable paving base levels, finished surface levels and depth of sub base are not shown	Hannah Kersley suggested via email we demonstrate compliance by lifting any of the permeable paved drives of unoccupied areas. Unfortunately, as there is	Noted. Commented closed.		

		minimal areas of permeable paving we don't have the opportunity to evidence this at this stage. Photo 1 and Photo 8 included within the report confirm the paving installed is performing as desired.			
19.	As-Built Drawings and Topographic Survey Flow control internal chamber dimensions are not shown	Refer to point 4.5 within the report. Also now shown on As-built survey.	Noted. Commented closed.		
20.	Certification The author does not confirm that the contents of the report are correct and a true reflection of what happened on site.	Refer to point 5.1.5.	Noted. Commented closed.		
21.	Certification The statement when included will need to be signed and dated by the author	Now signed.	Noted. Commented closed.		

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



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 October 2026 10:20
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hannah Kersley <Hannah.Kersley@arun.gov.uk>; David Easton <David.Easton@arun.gov.uk>
Subject: RE: Planning Re-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

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

Sent: 17 August 2026 16:09

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

Subject: Planning Re-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
Grid Reference: 490175 99581
Category: Discharge of Condi
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.

I am able to inform you that I have received an amendment to the above application dated 14th August 2026 relating to: Additional Drainage Information

If you should wish to make further representations as a result of this amendment, please make any further comment by **1st September 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

Hannah Kersley

Planning Case Officer-Arun District Council

Telephone: 01903 737856

Email: hannah.kersley@arun.gov.uk

PLRECON_DOC (ODB) 2020