

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/69/26/DOC	Reviewer Reference:	ADC/EXT2/D2134/109
Planning Officer:	Simon Brooksbank	Date of Review:	09.07.2026
Site Name:	Land North of Seftor Road & 80 Rose Green Road Pagham		
Application Description:	Approval of details reserved by condition under P/134/16/OUT relating to condition 10- Surface Water Drainage.		
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: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection
2. Interception drainage	N/A	No objection
3. Extreme Rainfall and Flooding	Insufficient	Further information required
4. Water Quality	N/A	No objection
5. Amenity	N/A	No objection
6. Biodiversity	N/A	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	N/A	No objection

Reviewed Plans

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

- Ditch/ Bund Sections and Setting Out Sheet 3. Drg no. 10768/1642 Rev C2.
- Site Sections Proposed Flood Bund Sheet 1. Drg no. 10768/1639 Rev C6

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 10:

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. The scheme shall adhere to the principles below;

- 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.

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.”

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/69/26/DOC Site Name: Land North of Sefter Road & 80 Rose Green Road Pagham	Initial Issue Date: 09.07.2026 Issue Date: 09.07.2026 Reviewer Reference: ADC/EXT2/D2134/109
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Summary and Recommendation:

Condition 10: 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:	25/09/2024(P/72/24/DOC)	15/10/2024(P/72/24/DOC)	09.07.2026		
Condition Number: 10					
Comment Number					
1.	Whilst the updated S104 approval has been provided, it is evident that the listed supporting drawing revisions are in correct.	An updated certificate has been requested and will be sent over when this is available.	Noted. Please provide when available. Comment outstanding.		
2.	Drawing 1324,1325 & 1326 we corrupt, please re-send for review.	Included in this submission: Please note that 1326 drawing has been discarded. 1324 are long sections for network 1, 1325 are long sections for network 3 and 1327 are long sections for network 2.	Noted. Please provide full drawing set and drawing issue register to verify any updates. Comment outstanding.		
3.	It is noted that geocellular tanks 1, 2 & 3 have been updated to a specific supplier SDS, however the SDS design & data sheets were not supplied.	Please refer to E149524_01_A - ATT1 - Sefter Road Bognor Regis for Tank 1, E149524_02 - ATT2 - Sefter Road, Bognor Regis for	Noted. Please provide full drawing set and drawing issue register to verify any updates.		

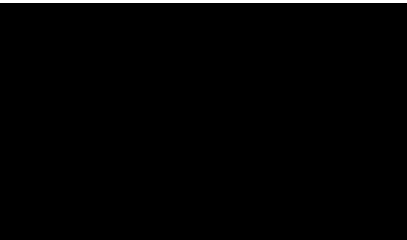
		Tank 2 and E149524_03 - ATT3 - Seftor Road, Bognor Regis for Tank 3	Comment outstanding.		
4.	The 1D hydraulic calculations for tanks 1,2 & 3 have not been updated to reflect the 750mm depth units; the calculations still use 800mm, however it is noted that the design tank 'footprints' have increased hence is unlikely to materially affect water levels. Please note this may be relevant for future updates, verification reports and construction records.	We have run new calcs with updated tank areas/heights. Network 1 updated to reflect the new connection for tank 2. Please refer to 10768_L_Surface Water Network 1 Simulation and 10768_K_Surface Water Network 2 Simulation. For network 1, the updated calcs show amended max water levels within pond 4 and within hydrobrake chamber SWMH1.24 (max water level for the 100yr storm + 40%CC dictates the weir overflow level within the chamber). Drawings 1633 and 1504 have been informed accordingly. For network 2, the updated calcs show amended max water levels for Pond 5 & Pond 6, but no change of the max water levels for pond 7. Hydrobrake chamber SWMH17.9 max water level amended (100yr storm + 40%CC water level dictates	It is understood that the updated 2 No drawings relate to the boundary ditch/flood bund feature variations. The applicant however has not provide any summary to explain the situation for this application. This summary must clarify the variations from the approved design and clarify any issues raised by ADC following site inspections.		

		the weir overflow level within the chamber), Hydrobrake chamber SWMH21.7 max water level did not change. Drawings 1634, 1635 and 1505 have been informed accordingly. Pond & Tank half drain time calcs - Full summary updated accordingly to new max water levels (revK).			
5.	Where the surface water networks have been amended, please provide the flow control data sheets for manhole SWMH1.17 to ensure the manhole design coordination.	Please refer to SHE-0142-1000-1250-1000_Design_Drawing Dimensions of SWMH1.17 shown on drawing 1504 are in line with the above data sheet by HydroInternational	Noted. Please provide full drawing set and drawing issue register to verify any updates. Comment outstanding.		
6.			Further to comment 4 above, it is evident that the flood bunds and swale are to provide some mitigation for exceedance flow. Further evidence is require to determine the impacts of these local catchments where this is partially footway (impermeable) and verge (greenfield run-		

			off). This shall be quantified and re-modelled within the 1D calculations to conclude there is sufficient provision within the receiving SUDS basins/network.		
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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
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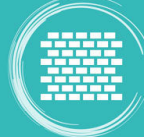
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 July 2026 11:27
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Brooksbank <Simon.Brooksbank@arun.gov.uk>
Subject: RE: Planning Consultation on: P/69/26/DOC

Please find enclosed our consultants response; further information required.

Regards

Paul Cann
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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: 28 May 2026 17:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/69/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/69/26/DOC
Registered: 22nd May 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 relating to condition 10- 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 **11th June 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

Simon Brooksbank

Planning Case Officer- Arun District Council

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