

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/81/26/DOC	Reviewer Reference:	ADC/EXT2/D2134/111
Planning Officer:	Simon Brooksbank	Date of Review:	10.07.2026
Site Name:	Land North of Sefter Road and 80 Rose Green Road Pagham		
Application Description:	Approval of details reserved by condition imposed under P/134/16/OUT relating to condition 12-maintenance and management of surface water drainage system.		
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 12: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

- OVERLAND FLOW ROUTES 10/66/1610 REVC4
- ADOPTABLE MANHOLE SCHEDULES 10768/1620 REVC8
- IMPERMEABLE CONTRIBUTIN TO SURFACE WATER NETWORK 10768/1611 REVC4
- DRAINAGE PLANS, uploaded in 7 parts via public planning portal
- DRAINAGE MAINTENANCE AND MANAGEMENT STATEMENT
- APPENDIX A AND B
- DRAINAGE PLANS
- DRAINAGE STATEMENT

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 12:

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Condition wording

Condition 12 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.

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/81/26/DOC Site Name: Land North of Sefter Road and 80 Rose Green Road Pagham	Initial Issue Date: Issue Date: Reviewer Reference:
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Summary and Recommendation:

Condition 12: 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)	10.07.2026		
Condition Number: 12					
Comment Number					
1.	The applicant/designer must please refer to Arun DC document PCENchecklist4 'surface water drainage maintenance and management checklist' and ensure the report is compliant. I have identified a number of items below.	Refer to comments below			
2.	The report & supporting maintenance plan drawing, must name all adopting parties and their standard be referenced.	Paragraph 1.11 under "Compliance" New drawing created to reflect management company and private maintenance responsibilities (10768/1150 Management and Maintenance Areas Plan in Appendix C)	Noted, however append D appear to be missing from the recent submission. Comment Outstanding.		

3.	A pre-handover inspection must be stipulated as a requirement.	Paragraph 1.11	Noted. Comment closed.		
4.	There must be details of who to contact if the surface water drainage system is not functioning correctly.	Paragraph 10.3	Noted. Comment closed.		
5.	There is a maintenance record pro-forma provided.	Appendix D	Noted, however append D appear to be missing from the recent submission. Comment Outstanding.		
6.	The report must ensure there are clear details of who to contact if the surface water drainage system is not functioning correctly.	Paragraph 10.3	Noted. Comment closed.		
7.	There is no advice provided as to what to do if alterations are to be made to the development or, works are to be carried out which may affect the surface water drainage system.	Last paragraph of 1.11	Noted. Comment closed.		
8.			The letter summary advises there has been a number of variations		

			since the last data review as follows: • A number of NMA's • Updates to the S104 • Updates to the Maintenance & Management Statement Please can the applicant provide a more comprehensive summary of these changes for the benefit of this review. Where changes has been made to the S104, please provide undertaker acknowledgements.		
9.			Further to items 2 & 8 above, it is not clear if drawing 10768/1150 Management and Maintenance Areas Plan in (Appendix C) has been updated where this was not included.		

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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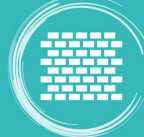
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Delivering the right homes in the right places



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 11:41
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/81/26/DOC

Please find enclosed our consultants response, further information required.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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: 11 June 2026 10:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/81/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/81/26/DOC
Registered: 10th June 2026
Site Address: Land North of Sefter Road and 80 Rose Green Road Pagham
Description of Works: Approval of details reserved by condition imposed under P/134/16/OUT relating to condition 12-maintenance and management of surface water drainage system.

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 **25th 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

Telephone: 01903 737881

Email: simon.brooksbank@arun.gov.uk