

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/84/26/DOC	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Hannah Kersley	Date of Review:	10/08/2026
Site Name:	Land North of Hook Lane Pagham		
Application Description:	Approval of details reserved by condition approved under P/149/23/S73 relating to condition 12b-as built drawings of fully implemented scheme with completion report.		
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 12b: Objection
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Not applicable	No objection
2. Interception drainage	Not applicable	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Not applicable	No objection
5. Amenity	Not applicable	No objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- DRAINAGE VERIFICATION REPORT CATCHMENT AREAS 1, 2 AND 3
- APPENDIX A
- APPENDIX B, 5 parts uploaded via public planning portal
- APPENDIX C
- APPENDIX D, 2 parts uploaded via public planning portal
- SEWERS FOR ADOPTION PRECAST CONCRETE HEADWALLS
- PHOTOS, 3 parts uploaded via public planning portal
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Condition wording

Condition 12b is worded as follows:

"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.

Reason : To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan"

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Significant elements of the design have not been verified or are noted to be absent (hydrobrakes and membranes). The author has noted discrepancies with the approved design and suggested no remediation. They state that the design has been constructed as approved with insufficient justification.
3. It is assumed that if the report were to be approved and the condition partially discharged for the applicable phases, that there is a realistic risk that flood risk will be increased. As such we object to the application. It is expected that it will take time to collate the necessary information and report on it, as such, it is expected that a new application will be required.

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/84/26/DOC Site Name: Land North of Hook Lane Pagham	Initial Issue Date: 10/08/2026 Issue Date: Reviewer Reference: ADC/EXT4b
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Summary and Recommendation:

Condition 12b: **Objection**

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	ADC Drainage Comments	Designer Response		
Date:	10/04/2026	10/08/2026			
Condition Number: 12b					
Comment Number					
1.	The author is guided to our verification checklist at https://www.arun.gov.uk/download/suds-verification-checklist-oct2025docx.docx?ver=30244&doc=docm93jjm4n22157.docx This gives useful information as what is expected in a verification report submitted to discharge a relevant planning condition.	Advice still stands.			
2.	Please include a statement to confirm that the author (or their company) is covered by a suitable professional	Comment outstanding			

	indemnity insurance for the verification works provided.				
3.	An inspection was undertaken in October 2025 and it appears no further visits have been made to site. The inspection was unable to include verification of key elements and as such the author relies upon information supplied by the contractor, some of which is still unknown or uncertain. Further inspection by the author is necessary to verify the drainage.	An additional site visit has been undertaken on 15 April 2026. The inspection seems to be limited to collection of site photographs, with the developer Bellway Homes supplying the drainage survey. Photographs demonstrate that the design has not been installed as approved including missing headwall(s) and flow controls.			
4.	The report is caveated in paragraph 1.1.4 that the author has been led to believe that 'minor' adjustments like pipe layout, local invert levels, chamber size and location are allowed on sit to suit specific site conditions or constructability. It is stated that such adjustments are outside the scope of the report. The verification of the drainage relates to the entirety of the system. It is the responsibility of the	Comment outstanding.			

	verifying engineer to report any deviation from the approved design and then to assess whether this has an impact on the function of the system. If construction tolerances are allowed, these should be reported and justified.				
5.	There was no inspection of the excavation of the basins and improved watercourse. Indeed, the engineer reports that there is uncertainty regarding the installation of proposed liners. These are critical to the design and must be verified.	A receipt has been provided for 2200m ² of liner. This is insufficient for the full area of the basins (based on the calculations) and no explanation is offered as to what area this was used for.			
6.	Please confirm the inspection and testing regime during placing of earthworks, pavement or filter materials.	Comment outstanding – photographs of installation have been supplied, but no records or statements regarding the inspection and testing have been submitted.			
7.	Please confirm what inspections (if any) took place during the laying of pipework or construction of manholes. (It is noted that hydrobrake chambers were under construction during the time of inspection).	Comment outstanding.			

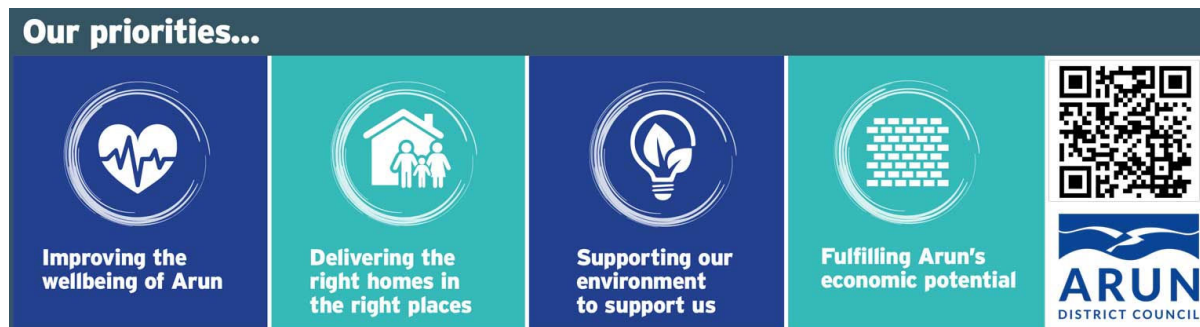
8.	The author has provided a statement to confirm that 'based on the information supplied' the drainage system within bellway Catchment Areas 1 and 2 has been principally constructed as per the approved designs. It is suggested that the author reconsider this.	Comment outstanding.			
9.	SuDS basin 3 –Min top of bank level 4.52 instead of 4.74. No confirmation of stay wet and low flow channel. Both inlet and outlet are 750mm diameter instead of 825mm. No gabions on headwall 18. No grilles. No detail for headwall 17, no clear photograph of headwall 18, only distant photo of headwall 17. No confirmation of side slopes. No confirmation that plan area is constructed as approved. Similar issues found on other basins – please report in detail and accurately.	Comment outstanding.			

10.	Watercourse section – appears to be narrower than approved.	Comment outstanding.			
11.	At least two hydrobrakes are not recorded on the drainage survey. All hydrobrakes must be fully verified, including post construction photographs and receipts of purchase confirming that the correct specification hydrobrake has been installed.	Comment outstanding.			
12.	Pipes have been laid flatter than approved or acceptable to achieve self-cleansing velocities. The author identifies this but provides no conclusive opinion regarding remediation or improved maintenance.	Comment outstanding.			
13.	No reference is made to CCTV surveys to confirm that pipes are clear of debris and constructed without fault.	Comment outstanding.			
14.	Please submit receipts or confirmation of test certificates for membranes.	Received for basin liners, also applies to permeable paving.			

15.	Please confirm planting is in accordance with approved plans in the report.	Comment outstanding.			
16.	Please offer specific explanation offered for any variances from the approved design in the report.	Comment outstanding.			
17.	Please verify any remediation works and confirm how these have been both identified and verified.	Comment outstanding.			
18.	It is unclear from the submission where areas of permeable paving are approved and how they have been verified.	Comment outstanding.			

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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Littlehampton, West Sussex, BN17 5LF
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From: Paul Cann
Sent: 10 August 2026 12:45
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/84/26/DOC

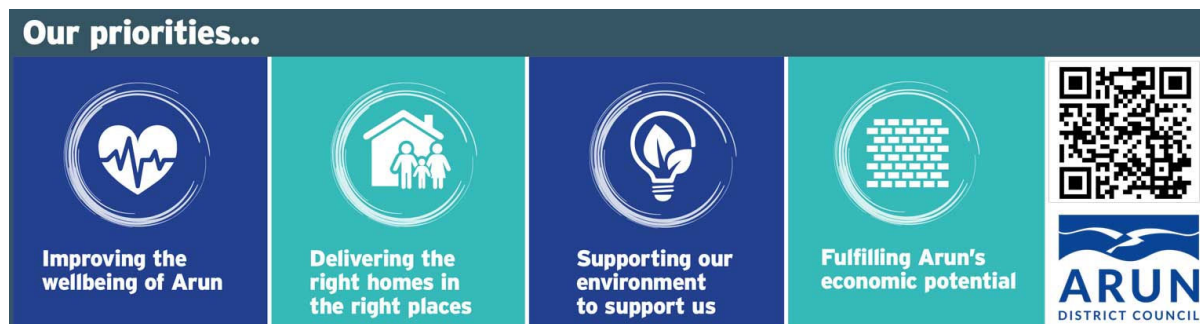
Please find enclosed our consultants response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 18 June 2026 08:33

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

Subject: Planning Consultation on: P/84/26/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/84/26/DOC
Registered: 17th June 2026
Site Address: Land North of Hook Lane Pagham
Description of Works: Approval of details reserved by condition approved under P/149/23/S73 relating to condition 12b-as built drawings of fully implemented scheme with completion report.

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 **2nd July 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

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Email: hannah.kersley@arun.gov.uk