

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/124/25/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	4/12/2025
Site Name:	Land to East of Commonmead Barn Pagham Road Pagham PO21 3PY		
Application Description:	2 No single storey detached dwellings (with accommodation in the roof space) along with associated car and cycle parking (resubmission following P/9/24/PL). This application is a Departure from the Development Plan and is in CIL Zone 5 and is CIL Liable as new dwellings.		
Assessment Number:	1		

Policy and Guidance Information
<p>Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater</p> <p>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/</p> <p>Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/</p> <p>Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions</p> <p>The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</p> <p>The SuDs Manual [C753] by CIRIA</p>

Response	Objection
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References
<p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p>

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 likely result in an **objection** to an objection to a full or reserved matters planning application.

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.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

Standard	Assessment	Response
1. Runoff destination	Insufficient	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	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:

- SUDs and Drainage Report P2
- FRA
- PLANNING STATEMENT
- CULVERT INFORMATION
- PLOT 2 PROPOSED FLOOR PLANS AND ROOF PLAN PL107
- PLOT 1 FLOOR PLANS AND ROOF PLAN PL105
- LOCATION PLAN PL101
- PLOT 1 PROPOSED ELEVATIONS AND SECTION PL106 REVA
- PLOT 2 ELEVATIONS AND SECTION PL108 REVA

Consultation comments to the planning officer

0. General

- 0.1. The site is within a future year flood zone (Flood Zone 2) identified by the Environment Agency flood map for planning. The LPA should therefore apply NPPF sequential testing requirements.
- 0.2. We previously provided comments on a similar application at this site P/9/24/PL and objected due to insufficient information regarding the existing culverted watercourse and drainage proposals.

1. Runoff destination

- 1.1. The groundwater monitoring shows winter groundwater levels within 1 metre of the base of the proposed infiltration features. The report notes piped outlets to the onsite culverted watercourse but none are shown on the drainage layout.
- 1.2. The 3m easement for the culverted watercourse should be shown on the plans and may conflict with the proposed building location.
- 1.3. The runoff destination is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. Interception drainage is currently provided by bio retention installations and permeable paving, however, once the design is altered to remove infiltration within 1 metre of groundwater, measures to include interception drainage will need to be added.
- 2.2. Please note, consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development.
- 2.3. Where infiltration is not viable, there is a risk that interception drainage for the impermeable areas drained to the permeable paving may only be delivered by evapotranspiration. Additional interception features may need to be included within the proposed layout.
- 2.4. Inception drainage (once infiltration is removed) is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. The risk to the development from external sources in the present day is low or very low. The site is partly within a future year flood zone for rivers and seas. The future year flood level at the site is not known and should be presented within the FRA. Due to the position on the edge of the extreme future year flood zone, the risk of internal flooding to the dwellings will be low. We therefore do not object to the development on flood risk grounds.
- 3.2. The drainage layout and calculations are currently based upon an infiltration solution, which is not acceptable due to high groundwater. The report notes connection to the exiting culverted ordinary watercourse at a peak rate of 2l/s. This peak outflow rate is arbitrary and not restricted to greenfield runoff rates in accordance with the National SuDS Standards. Design flow restriction should be based upon greenfield runoff equivalent for the drained area and if necessary a relaxation applied where constraints preclude meeting the GFR rate. Modern flow controls can achieve rates much lower than 1l/s with adequate blockage mitigation incorporated.
- 3.3. A drained areas plan should be provided. It is noted that the urban creep allowance is incorporated into the model simulations.
- 3.4. The infrastructure within the permeable paving storage may reduce the available capacity and any significant chambers and any utilities margin should be removed from the plan area / volume calculation.

4. Water quality

- 4.1. The mitigation provided by the bioretention installations and permeable paving (including when lined) is sufficient to mitigate the risk of pollution from the development.
- 4.2. Please note we will need to re-assess if the design changes.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 5.4. Amenity is not currently in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 6.4. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. An outline Management and Maintenance Plan should be provided within the planning application. This will need to incorporate information on ownership and management responsibilities for shared infrastructure.
- 7.2. The development proposal is not currently in accordance with the requirements of the NSfS (Standard 7). Therefore, we **object** to the application.

8. Suggested conditions / Overcoming the objection

- 8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.
- 8.2. **The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**
- 8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

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

P/124/25/PL

PL- consultation- drainage response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Sent: 08 December 2025 10:25

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

Cc: Harry Chalk <Harry.Chalk@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>

Subject: RE: Planning Consultation on: P/124/25/PL

Hi Harry,

Find the consultation – an objection – attached. Apologies for the delay in response.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

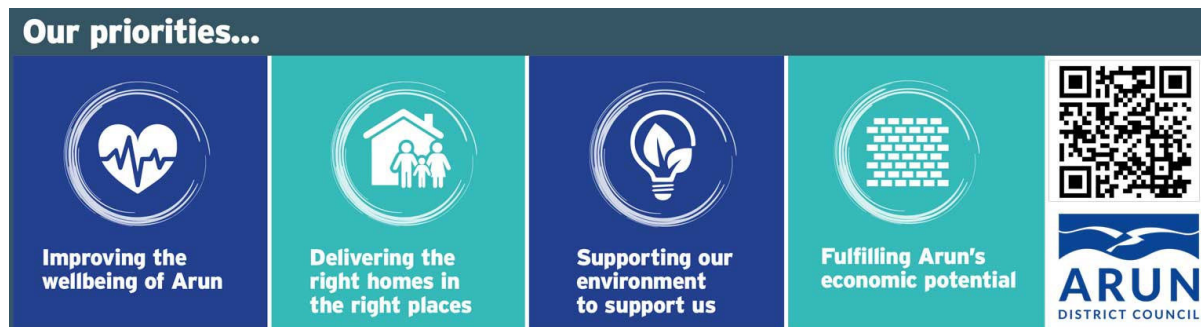
Kind regards

Sarah Burrow
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 09 October 2025 08:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/124/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: P/124/25/PL
Registered: 3rd October 2025
Site Address: Land to East of Commonmead Barn Pagham Road Pagham PO21 3PY
Grid Reference: 489321 99017

Description of Works: 2 No single storey detached dwellings (with accommodation in the roof space) along with associated car and cycle parking (resubmission following P/9/24/PL). This application is a Departure from the Development Plan and is in CIL Zone 5 and is CIL Liable as new dwellings.

The Council have received the above application.

[Click here to view the application and 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.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 13th November 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-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.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Harry Chalk

Planning Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk

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