

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                                                                                                                                   |                            |             |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| <b>Application Reference:</b>   | <b>P/35/26/PL</b>                                                                                                                                                                                                                                                                                 | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Harry Chalk                                                                                                                                                                                                                                                                                       | <b>Date of Review:</b>     | 05/06/2026  |
| <b>Site Name:</b>               | Land to East of Commonmead Barn Pagham Road Pagham PO21 3PY                                                                                                                                                                                                                                       |                            |             |
| <b>Application Description:</b> | Construction of 2 No single storey detached dwellings (with accommodation in the roof space) along with associated car and cycle parking (resubmission following P/124/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 5 and is CIL Liable as new dwellings. |                            |             |
| <b>Assessment Number:</b>       | 2                                                                                                                                                                                                                                                                                                 |                            |             |

| Policy and Guidance Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |  |

|                 |                                           |
|-----------------|-------------------------------------------|
| <b>Response</b> | <b>No objection subject to conditions</b> |
|-----------------|-------------------------------------------|

| 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                                                             | Compliant    | <b>No Objection</b> |
| 2. Interception drainage                                                          | Compliant    | <b>No Objection</b> |
| 3. Extreme Rainfall and Flooding                                                  | Compliant    | <b>No Objection</b> |
| 4. Water Quality                                                                  | Compliant    | <b>No Objection</b> |
| 5. Amenity                                                                        | Insufficient | <b>No objection</b> |
| 6. Biodiversity                                                                   | Insufficient | <b>No objection</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Compliant    | <b>No objection</b> |

## Reviewed Plans

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

- Drainage Layout Rev 5
- Construction Details Rev P1
- Impermeable Areas & Overland Flow Plan Rev P2
- SuDS and Drainage Report Rev P5
- Applicant response to representations and consultations, uploaded in 2 parts via public planning portal
- SuDs Maintenance Schedule Rev 3
- C3552 Flow
- C3552\_Sections

## Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- CGS Drawing C3552/P/101/Rev 5 Drainage Layout
- CGS Drawing C3552/P/301/Rev P1 Construction Details

- SuDS and Drainage Report Rev P5 dated 28/04/2026
- SuDS and Drainage Report Rev P5 dated 28/04/2026
- SuDS Maintenance Schedule Rev P3 dated 11/05/2026

## Consultation comments to the planning officer

### 0. General

- 0.1. We note the previous application P/124/25/PL (refused) and our comments on that submission.
- 0.2. The application for residential development of two dwelling houses is supported by a Flood Risk Assessment and a Sustainable Drainage Statement.
- 0.3. The site is on the edge of / just within a future year flood zone (Flood Zone 2) identified by the Environment Agency flood map for planning. The FRA does not confirm the 2126 undefended tidal flood level. The LPA should therefore take advice from the Environment Agency and apply NPPF sequential testing requirements as appropriate.
- 0.4. The risk to the development from external sources as shown by defended scenarios and the surface water flood risk is acceptable and we do not object to the proposals on grounds of external flood risk.
- 0.5. The development is two new dwellings served by a new drainage system and will affect drainage on and off site. Therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.6. The application is for non-major development and the measures should be proportionate to the nature and scale of development.

### 1. Runoff destination

- 1.1. Rainwater harvesting units are proposed for each dwelling and fulfil the water reuse priority.
- 1.2. Ground investigations have indicated that discharge to ground is not viable and we therefore accept the principle of discharge to the piped watercourse crossing the site.
- 1.3. In order to ensure the culvert is fit for purpose to receive flow and is not damaged during construction, the integrity of the culvert will need to be surveyed by CCTV before and after construction and any remedial works undertaken as part of the development. This can be the subject of a planning condition.
- 1.4. Connection to the culvert, as a piped Ordinary Watercourse, would require the approval of West Sussex County Council as LLFA. Application for Ordinary Watercourse Consent and approval should be obtained from the LLFA prior to connection.

### 2. Interception drainage

- 2.1. Interception drainage is provided by the permeable pavement and bioretention units, which are appropriate for the type and scale of development.

### 3. Extreme rainfall and flooding

- 3.1. The greenfield runoff [GFR] assessment indicates a 50% AEP peak runoff rate of 0.1 litres per second. The proposed design peak outflow for the site is 0.5 litre per second which is 5 times the greenfield runoff rate and is allowable in accordance with the NSfS.
- 3.2. Blockage protection is provided and the upstream inlets are filtered through bioretention planters and permeable paving. The revised calculations are acceptable and demonstrate no flooding during the design storm.

#### 4. Water quality

- 4.1. The assessment of water quality mitigation and the measures provided by permeable paving and bio-retention planters are acceptable.

#### 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. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.
- 5.3. The planters provide some multifunctional benefit

#### 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. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.
- 6.3. The planters provide some multifunctional benefit.

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

- 7.1. A maintenance plan for the drainage system has been submitted and is acceptable.

#### 8. Suggested conditions / Overcoming the objection

We propose the following planning conditions.

PCENG2B: (note text 'condition 1' is to be altered as required)

Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The detailed design must be based upon and build on the surface water information submitted pursuant to **Condition 1**.

The full details submitted for approval shall include:

1. Detailed drainage plans conforming to Local Planning Authority guidance,
2. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,
3. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme.

The scheme shall then be constructed as per the approved plans. No building shall be occupied until the complete surface water drainage system serving that building has been implemented in accordance with the agreed details.

The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority. The local authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development.

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 and the NPPF. This is required to be a pre commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

### PCENG3:

The development shall not proceed until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling, or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Arun Local Plan policies W DM1, W DM2 and W DM3, and to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010 can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing.

### 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



**From:** Elaine Walby on behalf of Planning.Responses  
**Sent:** 09 June 2026 14:53  
**To:** Planning Scanning  
**Subject:** FW: Planning Consultation on: P/35/26/PL  
**Attachments:** P-35-26-PL - Land East of Commonhead Barn 2 - v2.docx

PL- Consultation- Engineers response

**Elaine Walby**  
**Technical Support Assistant**  
**Planning Services**

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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>

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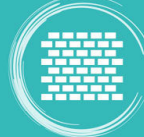
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



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**From:** Paul Cann <[Paul.Cann@arun.gov.uk](mailto:Paul.Cann@arun.gov.uk)>  
**Sent:** 05 June 2026 14:26  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Cc:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>; Harry Chalk <[Harry.Chalk@arun.gov.uk](mailto:Harry.Chalk@arun.gov.uk)>  
**Subject:** RE: Planning Consultation on: P/35/26/PL

Please find enclosed our consultants response; no objection subject to conditions.

Regards

**Paul Cann**  
**Principal Drainage Engineer**, Coastal Engineers and Flood Prevention

**T:** 01903 737819  
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Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 18 May 2026 14:49  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: P/35/26/PL

**To:**     **Engineers (Drainage)**

**NOTIFICATION FROM ARUN DISTRICT COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990**

|                              |                                                                                                                                                                                                                                                                                                   |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Application No:</b>       | <b>P/35/26/PL</b>                                                                                                                                                                                                                                                                                 |
| <b>Registered:</b>           | 26th March 2026                                                                                                                                                                                                                                                                                   |
| <b>Site Address:</b>         | Land to East of Commonmead Barn Pagham Road Pagham PO21 3PY                                                                                                                                                                                                                                       |
| <b>Grid Reference:</b>       | 489321 99017                                                                                                                                                                                                                                                                                      |
| <b>Category:</b>             | Plan Applicat'n                                                                                                                                                                                                                                                                                   |
| <b>Description of Works:</b> | Construction of 2 No single storey detached dwellings (with accommodation in the roof space) along with associated car and cycle parking (resubmission following P/124/25/PL). This application is a Departure from the Development Plan and is in CIL Zone 5 and is CIL Liable as new dwellings. |

I am able to inform you that I have received an amendment to the above application dated 14th May 2026 relating to:- Substitute and supplementary drainage documents and plans

If you should wish to make further representations as a result of this amendment, please make any further comment by **2nd June 2026**.

[Click here to view the application, documents and make further comments](#)

**Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.**

Yours sincerely

Harry Chalk

Planning Case Officer- Arun District Council

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