

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/43/25/PL	Reviewer Reference:	ADC/SB
Planning Officer:	Hannah Kersley	Date of Review:	28/10/2025
Site Name:	Land to the west of Inglenook Hotel 255 Pagham Road Nyetimber PO21 3QB		
Application Description:	Demolition of existing storage buildings and the erection of 6 No dwellings and associated works. This application affects the setting of listed buildings, is a Departure from the Development Plan and is in CIL Zone 5 and is CIL Liable as new dwellings.		
Assessment Number:	2 of 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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	No objection subject to conditions
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient – for access road only	No objection subject to conditions
5. Amenity	Compliant (minimum)	No objection subject to conditions
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

- Flood Risk Assessment & Drainage Strategy, reference D2310/FRA1.1, dated 17/04/2025 and all plans contained within it. Referred to as the **FRA**.
- Designer drainage consultation response, reference D2310, dated 21 August 2025. Referred to as the **response letter**.
- Southern Water capacity check 02.09.25
- Tree Survey and Report, reference B/0559/25
- Preliminary ecology appraisal

Please also refer to our previous consultation response for this application, dated 13 August 2025.

Consultation comments to the planning officer

0. General

- 0.1. The applicant has not demonstrated that the proposed surface water drainage design will not increase flood risk on site or elsewhere.

1. Runoff destination

- 1.1. The proposed strategy adequately justifies the proposed runoff destination. Water reuse is proposed, infiltration has been demonstrated not to be viable and the most sustainable and viable alternative disposal location is the public surface water sewer. We have **no objection** to this.

2. Interception drainage

- 2.1. The designer has still not provided a formal assessment of interception drainage to demonstrate how this national standard is being achieved. The planning officer is guided to our original consultation for reference to what interception drainage is.
- 2.2. The designer touches on interception in the response letter. They state that rainwater butts will be introduced to encourage water reuse. The water reuse is necessary to comply with the drainage hierarchy (standard 1). However, unless rainwater harvesting systems are designed for regular supply (rainwater butts are not) they cannot be assumed to deliver interception drainage.
- 2.3. The designer also notes that rainwater planters may be incorporated into the design but has not proposed them now, nor demonstrated that the area of vegetated surface is sufficient to meet the national standards for the roof areas. It has not been confirmed what area of vegetated surface would be necessary to comply with the national standards for SuDS (and the guidance of The SuDS Manual) and no departure from those standards has been requested.
- 2.4. It is unclear how interception drainage may be incorporated following approval as the inclusion of features which provide evapotranspiration will affect the scale and layout of the development and may conflict with approved plans. This may result in sustainable drainage methods being compromised due to lack of sufficient consideration early in the design process.
- 2.5. This standard has not been met and it is unclear how it will be within the proposed scale and layout of the development therefore we continue to **object** to the application.

3. Extreme rainfall and flooding

- 3.1. It was previously stated that the applicant had not adequately justified the proposed discharge rate from the site. The greenfield runoff calculations have now been updated to reflect the positively drained area in the proposed drainage strategy. These show that the mean annual greenfield runoff rate for the site (QBAR) is 0.22l/s.
- 3.2. It is understood that a higher discharge rate than QBAR or 3l/s/ha (0.231l/s) is proposed to minimise the risk of blockage associated with small orifices on flow control devices. However, with appropriate mitigation smaller orifices which allow rates to be restricted further can be used. Alternatively, vortex flow control devices are sold which allow flows to be restricted to up to 0.7l/s.
- 3.3. The designer notes that Southern Water are responsible for advising whether flow rates are acceptable. Indeed, a capacity check from Southern Water has been submitted to evidence that there is adequate capacity in the network for a connection of up to 2l/s. However, Southern Water

bear no responsibility for assessing what increase in flood risk there may be from the greenfield state due to the proposed development. This responsibility lies with the Local Planning Authority.

- 3.4. In our last consultation it was noted that the contributing area must be consistent between the greenfield runoff calculations and the proposed drainage strategy. The national standards for SuDS state the whole potentially contributing area should be used. Therefore, there is scope for the designer to increase the discharge rate up to 0.72l/s – 3l/s/ha multiplied by the whole site area of 0.2399ha. For this approach (which is not suggested by the designer) to be compliant, the proposed drainage would have to account for pervious contributing areas.
- 3.5. The proposed discharge rate does not accord with the national standards for SuDS, nor are calculations provided to demonstrate that surface water volumes are not being increased post-development as suggested by The SuDS Manual. Therefore, it should be assumed that flood risk may be increased by the proposed design and discharge rate, and the previous **objection** is sustained.
- 3.6. The access road drainage has not been adjusted following the previous objection, which still stands:
- 3.7. *The access road is claimed to be 'free draining', this is inappropriate. Groundwater levels are high enough that they may penetrate the subbase of the access road and insufficient depth of unsaturated ground is provided between the base of the road and the peak groundwater level. This means that surface water will not be adequately treated. Furthermore, the infiltration potential of the site has not been demonstrated (due to high groundwater), therefore there is a risk that the access road will flood.*
- 3.8. The designer states that the construction methods are dictated by the constraints of the site with regards to the existing trees. However, these constraints are a product of the access road location within the tree root protection zone of an offsite poplar which is the subject of a tree preservation order (TPO). The layout of the development has not been approved, and this conflict should be satisfactorily addressed so that the road is drained in a manner that does not increase flood risk, ideally to the satisfaction of the tree officer. The constraints of the site and this potential conflict should have been considered early in the design process, rather than sustainable drainage requirements being compromised.

4. Water quality

- 4.1. The water treatment assessment in the FRA is acceptable for the permeable paving in the driveways, which will provide adequate treatment for the surface water from the roofs and the driveways. However, it does not consider the water treatment of the access road which is 'self draining'. As discussed in paragraphs 3.6-3.8 this is not appropriate, and the design needs to be adjusted accordingly.
- 4.2. It is acknowledged that the submission of further evidence to demonstrate compliance with the water quality standard is unlikely to affect the scale or layout of the development. Therefore, we **do not object** to the proposal on these grounds, subject to a condition securing the provision of details demonstrating water quality benefits.

5. Amenity

- 5.1. It is acknowledged that due to the scale of the proposed development there are limited opportunities to offer amenity benefit. However, the proposed permeable paving of the driveways provides a

multifunctional benefit. Due to this limited amenity offering we have **no objection**, however, we would wish to see amenity benefits increased as may be necessary as a result of complying with other standards.

- 5.2. Due to the location of the access road within the tree root protection area of a TPO poplar and the drainage requirements of that road, there is a risk that the amenity value offered by the poplar could be compromised. This means that the amenity standard may need to be reassessed if the drainage design is updated.
- 5.3. SuDS features that incorporate planting or vegetation can help to achieve amenity benefit. These may also be necessary to meet interception and biodiversity standards.

6. Biodiversity

- 6.1. It is noted that the designer refers to a separate biodiversity assessment which considers the development as a whole. The preliminary ecology appraisal suggests as one of its 5 recommendations that SuDS are incorporated within the development to increase biodiversity. Suggestions appropriate for the scale of the development include green roofs or walls. These have not been suggested by the designer and could not be secured via condition as the roof plans and elevations of the buildings would all be approved by the permission.
- 6.2. It is inefficient and not ideal for ecology and SuDS requirements to be considered separately. Where BNG requirements allow for biodiversity benefit to be provided offsite, SuDS requirements do not. There is a less robust measurement, however, there is an expectation that the SuDS incorporates biodiversity benefit, and it makes sense for this to contribute to the biodiversity net gains (BNG) of the development. The designer has evidenced no demonstration of how biodiversity benefits are provided by the SuDS and therefore we **object** to the application.

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

- 7.1. Insufficient information has been submitted regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS is not met. It is noted that the proposed drainage of the access road would need to be redesigned to meet the requirements of standard 3. Such a redesign would result in this standard being reassessed.
- 7.2. Most elements of this standard can normally be secured via condition. The submission of a Management and Maintenance Plan is unlikely to affect the scale or layout of the development. Accordingly, we **do not object** to the proposal on these grounds, subject to a condition securing the detailed surface water drainage design.

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 **Ecology**
- ☐ None

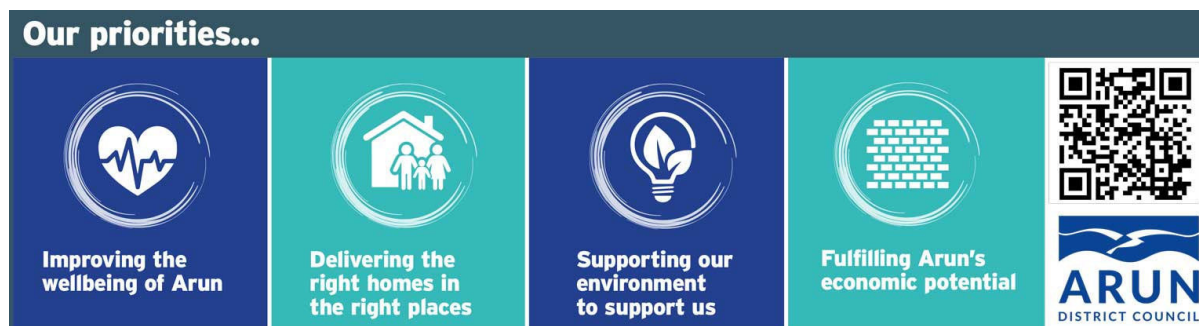
[REDACTED]

Drainage Engineers response

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
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<https://www1.arun.gov.uk/planning-application-finder>



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

Sent: 28 October 2025 13:59

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

Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Hannah Kersley <Hannah.Kersley@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>

Subject: RE: Planning Consultation on: P/43/25/PL

Hi Hannah,

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

Kind regards

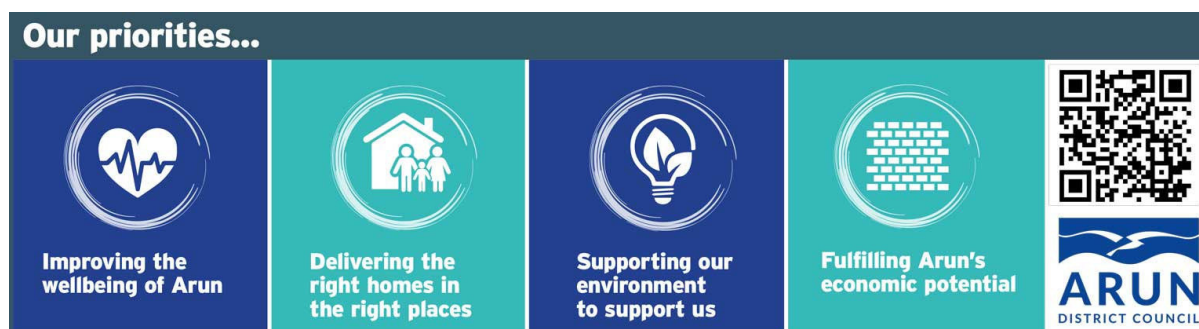
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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 16 September 2025 15:09

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

Subject: Planning Consultation on: P/43/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/43/25/PL
Registered: 9th May 2025
Site Address: Land to the west of Inglenook Hotel 255 Pagham Road Nyetimber PO21 3QB
Grid Reference: 489119 98725
Category: Plan Applicat'n
Description of Works: Demolition of existing storage buildings and the erection of 6 No dwellings and associated works. This application affects the setting of listed buildings, 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 15th September 2025 relating to:- Additional drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **8th October 2025**.

[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

Hannah Kersley

Planning Case Officer- Arun District Council

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