

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/56/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Kathryn Welch	Date of Review:	02/07/2026
Site Name:	Land to the west of Inglenook Hotel 255 Pagham Road Pagham PO21 3QB		
Application Description:	Demolition of existing storage buildings and construction of 6 No. dwellings and associated works (resubmission following P/43/25/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	
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 (Technical – read comments to planning officer)
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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
2. Interception drainage	Insufficient	Objection (Technical)
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	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:

- LOCATION PLAN 01
- TOPOGRAPHICAL SURVEY 04
- PROPOSED SITE PLAN 08 REVD
- DEVELOPER CAPACITY ENQUIRIES FLOW CALCULATIONS IMPACT OF NEW DEVELOPMENT
- FRA APPENDICIES
- FRA AND DRAINAGE STRATEGY
- SOUTHERN WATER LEVEL 1 CAPACITY CHECK ENQUIRY
- PLANNING AND HERITAGE STATEMENT
- PLANNING AND HERITAGE STATEMENT 2
- SEQUENTIAL AND EXCEPTION TEST

Consultation comments to the planning officer

0. Runoff destination

0.1. 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.

1. Interception drainage

1.1. The designer has submitted an adequate interception assessment which demonstrates that the interception standard is not met by the design.

1.2. The designer has included green roofs on the garages, raingarden planters, water butts and permeable paving, all of which will provide interception drainage.

1.3. It is acknowledged that to fully comply with the standard the scale and layout of the development would likely be affected and therefore a relaxation/departure from standard 2.6 – specifically 2.6.3 is requested.

1.4. As the design is not fully compliant with the national standards for suds and compliance may affect scale and layout, we must technically object. However, the planning officer may wish to consider agreeing the departure when weighed up against the other benefits of the proposed development.

2. Extreme rainfall and flooding

2.1. The proposed discharge rate of 0.5l/s is acceptable. We had previously indicated that we would accept a minimum discharge rate of 0.7l/s. However, the upstream permeable paving provides adequate mitigation for the risk of blockage that a lower discharge rate may be accepted. Attempting to reduce the flow rate to the 50% AEP (or QBAR rate) for the site is likely to increase risk of blockage and thus flood risk. As such, it is accepted that the proposed rate is the minimum that can be practically and safely achieved for the site. The greenfield runoff calculation itself uses an outdated method, however, given that it produces a rate which is practically unachievable an updated calculation is not requested.

2.2. Climate change and urban creep are adequately allowed for in the calculations. There appears to be a discrepancy between the total catchment areas shown in the model simulation results and on the plans – this amounts to 30m². This may result in additional storage being necessary within the network, however, it is assumed that as all storage is subterranean this will be unlikely to affect scale and layout.

3. Water quality

3.1. The water treatment assessment in the FRA is acceptable. It demonstrates that the permeable paving in the driveways and shared access road will provide adequate treatment for the surface water from the roofs and the driveways.

4. Amenity

4.1. It is acknowledged that due to the scale of the proposed development there are limited opportunities to offer amenity benefit. However, by attempting to maximise compliance with other standards, features like green roofs and raingarden planters have been incorporated which provide visual amenity and the proposed permeable paving of the driveways provides a multifunctional benefit. Therefore, we have no objection.

5. Biodiversity

- 5.1. It is acknowledged that due to the scale of the proposed development there are limited opportunities to offer biodiversity benefit. However, by attempting to maximise compliance with other standards, features like green roofs and raingarden planters have been incorporated which provide biodiversity benefit. These features do not appear to be acknowledged within the BNG assessment, nor is a BRO assessment submitted. However, due to the scale of the site and the apparent benefit that is offered, we have no objection to the application on this ground.
- 5.2. There is an existing TPO tree offsite, the root protection area for this encroaches into the site and affects the construction of the shared access road. The construction of the road is lined (tanked). It is advised that the tree officer is consulted to ensure that the drainage strategy does not impact the existing tree. Pre-application discussion was had with the tree officer who had previously requested that a submission was made by the applicant's arboriculturist in this regard – however it is unclear if this has been submitted. The current proposal is satisfactory from a drainage perspective.

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

- 6.1. The Insufficient information has been submitted regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 7 of the Systems NSfS is not met. Most elements of this standard can normally be secured via condition. The submission of a more robust 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.

7. Suggested conditions / Overcoming the objection

- 7.1. As this is not a holding objection or a request for further information, requested conditions are not normally listed. However, if you are minded to approve this application, please apply the following conditions to ensure that the site is adequately drained without increasing flood risk. If a departure from the NSfS is agreed then we expect that this is acknowledged within the officers report.

- 8.1. 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 full details submitted for approval shall include:

1. Impermeable area plan,
2. Calculations modelling the surface water drainage network for the following storm events:
 - a. 100% Annual Exceedance Probability
 - b. 10% AEP + climate change allowance
 - c. 3.3% AEP + climate change allowance
 - d. 1% AEP + climate change allowance

All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,

3. Detailed drainage plans conforming to Local Planning Authority guidance,
4. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,
5. 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. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority.

Reason: In order to comply with Arun Local Plan policies (INSERT POLICIES) and the NPPF.

- 8.2. 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 Arun Local Plan policies W DM1, W DM2 and W DM3. 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.

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 03 July 2026 11:32
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: P/56/26/PL

Please find enclosed our consultants response, an objection. The reason for the objection has been discussed with the planning officer and they will decide if a deviation from the National Standards for SuDS is acceptable in this case.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: 27 May 2026 08:34

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

Subject: Planning Consultation on: P/56/26/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/56/26/PL
Registered: 26th May 2026
Site Address: Land to the west of Inglenook Hotel 255 Pagham Road Pagham PO21 3QB
Grid Reference: 489119 98725
Description of Works: Demolition of existing storage buildings and construction of 6 No dwellings and associated works (resubmission following P/43/25/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 25th June 2026. 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

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk

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