

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/60/26/PIP	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Brooksbank	Date of Review:	17/06/2026
Site Name:	Land at corner of Hook Lane and Pagham Road Pagham PO21 3PB		
Application Description:	Application for planning in principle for the erection of a minimum net gain of 1 No dwelling and a maximum net gain of 6 No 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

No Objection subject to Technical Details

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

It is acknowledged that this permission seeks to determine the principle of development only. That is the scope of permission in principle is limited to location, land use and amount of development. As surface water drainage design can directly impact the size and scale of development, these comments are relevant to the location and amount of development only.

Where the quantum of development is not being approved, an objection to a permission in principle is only made where:

- a viable runoff disposal location has not been evidenced,
- flood risk may be impacted by the proposal,
- surface water drainage may impact the proposed development scale and layout, or;
- a significant impact upon existing watercourses or natural drainage features is identified

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	No objection subject to Technical Details
2. Interception drainage	Not applicable (PIP)	No objection subject to Technical Details
3. Extreme Rainfall and Flooding	Insufficient	No objection subject to Technical Details
4. Water Quality	Not applicable (PIP)	No objection subject to Technical Details
5. Amenity	Not applicable (PIP)	No objection subject to Technical Details
6. Biodiversity	Not applicable (PIP)	No objection subject to Technical Details
7. Construction, operation, maintenance, decommissioning and structural integrity	Not applicable (PIP)	No objection subject to Technical Details

Reviewed Plans

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

-PROPOSED SITE PLAN 4670-VST-XX-XX-RP-A-0001 P07
-COVER LETTER

Consultation comments to the planning officer

0. General

0.1. The current application contains no flood risk or drainage information and we are therefore unable to assess the feasibility of the scheme and whether the development can meet sustainable drainage policy and standards with the NSfS.

0.2. The development would need to incorporate sustainable drainage in accordance with NPPF paragraph 182.

- 0.3. The method of disposal of surface water runoff is not established in the PIP submission and we cannot confirm whether the site would require offsite infrastructure or mechanical pumping to achieve a compliant solution.
 - 0.4. We cannot assess whether the illustrative layout provided is feasible from the information provided and the layout may be constrained by the onsite infrastructure. However, the PIP application is for a minimum of one dwelling, which would be far easier to achieve than the six dwellings shown on the illustrative layout.
 - 0.5. Part of the site is within a tidal flood zone during the lifespan of development and a site specific flood risk assessment and potentially Sequential Testing would be required at Technical Details stage.
1. Runoff destination
 - 1.1. Groundwater is known to be shallow at this location and infiltration is unlikely to be viable.
 - 1.2. No information has been provided with the application. The ability of the development to satisfactorily discharge surface water drainage should be established. However, due to the minimum of one dwelling, it can be reasonably concluded that a solution for the minimum quantum of development would be feasible.
 - 1.3. The Technical Details Consent application would need to demonstrate the development accords with NSfS requirements following the priorities for runoff destination.
 2. Interception drainage
 - 2.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development. Interception drainage ensures that rainfall from regular rainfall events does not leave the site. This replicates greenfield conditions and goes hand in hand with the management of extreme rainfall events to ensure that development does not increase flood risk.
 - 2.2. The Technical Details Consent application would need to demonstrate the development accords with NSfS requirements for Interception Drainage.
 3. Extreme rainfall and flooding
 - 3.1. No information has been provided with the application. However, on the basis of a potential development of one dwelling it is accepted that meeting the required standards would be feasible.
 - 3.2. The Technical Details Consent application would need to demonstrate the development accords with the NSfS.
 - 3.3. Guidance is provided on Arun DC webpages here: <https://www.arun.gov.uk/surfacewater/>
 4. Water quality
 - 4.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval.
 - 4.2. The later submitted water quality and proposed treatment assessment must assess each sub-catchment and their treatment methods where different parts of the site receive different treatment regimes. The designer should aim to treat all rainwater as close to source as possible. Open features which aid water treatment can impact the scale and layout.
 - 4.3. Treatment in accordance with the Simple Index Approach would be acceptable.

5. Amenity, Biodiversity, Construction and Maintenance

- 5.1. These standards cannot be fully assessed when the scale and layout of the development is not being submitted for approval.
- 5.2. Each of these standards can impact the scale and layout of the proposed development and the applicant and design team are encouraged to familiarise themselves with our guidance and checklists to avoid objection when a reserved matters application is made.
- 5.3. Multifunctional benefits should be designed to be proportionate to the nature and scale of development in accordance with NPPF paragraph 182.

6. Suggested conditions / Overcoming the objection

- 6.1. None.

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: Nicola Spencer on behalf of Planning.Responses
Sent: 19 June 2026 22:06
To: Planning Scanning
Subject: FW: Planning Consultation on: P/60/26/PIP
Attachments: P-60-26-PIP - Land at Corner of Hook Lane 1 v2.docx

Pl Consultation Engineers response

Nicola Spencer
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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>



Our priorities...

Improving the wellbeing of Arun

Delivering the right homes in the right places

Supporting our environment to support us

Fulfilling Arun's economic potential

Our core foundations

From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 19 June 2026 14:23
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Brooksbank <Simon.Brooksbank@arun.gov.uk>
Subject: RE: Planning Consultation on: P/60/26/PIP

Please find enclosed our consultants response. I understand that the application has been refused, so this response is just for the record.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Delivering the right homes in the right places

Supporting our environment to support us

Fulfilling Arun's economic potential

From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 20 May 2026 09:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/60/26/PIP

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

The Planning Act 1990

The Town and Country Planning (Permission in Principle) Order 2017(as amended) - Article 5J Consultations in relation to applications for Permission in Principle

Permission in Principle

Application No:	P/60/26/PIP
Registered:	8th May 2026
Site Address:	Land at corner of Hook Lane and Pagham Road Pagham PO21 3PB
Grid Reference:	489358 098882
Description of Works:	Application for planning in principle for the erection of a minimum net gain of 1 No dwelling and a maximum net gain of 6 No dwellings.

The Council has received the above Permission in Principle application. Permission in Principle applications are limited to the consideration of the 'in principle' matters of location, land use and amount of development. If approved, other matters would be considered at the technical detail application stage. If you wish to be consulted again at the technical detail stage, you must indicate this in your response as the council is only required to consult if specifically requested. This application needs to be determined within 5 weeks and only has a 14 day consultation period.

[Click here to view the application details 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.

Should you have any comments to make, these should be sent by replying to this email by 9th June 2026 . You can also monitor the progress of this application through the Council web site:

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

Simon Brooksbank

Planning Officer- Arun District Council

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