

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/6/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	11/03/2026
Site Name:	Fairhaven Nyetimber Lane Pagham PO21 3JT		
Application Description:	Construction of 3 No. detached chalet bungalows together with alterations to existing dwelling with the provision of modified access, parking & landscaping. This application is in CIL Zone 4 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
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection subject to conditions
5. Amenity	Insufficient	No objection subject to conditions
6. Biodiversity	Insufficient	No objection subject to conditions
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:

- PROPOSED ELEVATIONS, BIKE STORE ELEVATIONS, CARPORT ELEVATIONS DSL-131-PL-07-D
- EXISTING FIRST FLOOR PLAN 24077-02-B-1 SHEET 2 OF 3
- EXISTING GROUND FLOOR PLAN 24077-02-B-G SHEET 1 OF 3
- EXISTING ELEVATIONS 24077-02-E-GA SHEET 3 OF 3
- PROPOSED COMBINED SITE LAYOUT DLS-131-PL-09-A
- PROPOSED FLOOR PLANS EXISTING HOUSE DLS-131-PL-03-B
- PROPOSED EXISTING HOUSE ELEVATIONS DLS-131-PL-04-A
- PLOTS 1 AND 2 PROPOSED FLOOR PLANS DLS-131-PL-06-C
- PROPOSED ELEVATIONS PLOT 3 DLS-131-PL-08-B
- PROPOSED COMBINED SITE LAYOUT DLS-131-PL-09-A
- TOPOGRAPHICAL SURVEY DTS110923-47G DRAWING 1 OF 1
- FOUL AND SURFACE WATER DRAINAGE DESIGN SUMMARY AND CALCULATIONS
- LOCATION PLAN DLS-131-LP-01

Consultation comments to the planning officer

0. General

- 0.1. The site is within flood zone 1 for rivers and seas and is not at significant risk from external surface water flooding. There is no objection due to external flood risk.
- 0.2. The development is non major residential development on a previously developed site. The development would alter drainage on and offsite and therefore requires sustainable drainage in accordance with NPPF requirements.

1. Runoff destination

- 1.1. The development should include an element of rainwater harvesting in accordance with the NSfS. The drainage layout shows water butts, which is acceptable for residential dwellings.
- 1.2. The ground investigation confirms shallow groundwater levels within 1m of the surface which preclude discharge to ground via soakaways. There are no watercourses available to the development. The proposed method of disposal of discharge to a surface water sewer is therefore acceptable.
- 1.3. Runoff destination is acceptable.

2. Interception drainage

- 2.1. Inception drainage is not discussed in the submitted Drainage Statement.
- 2.2. The design includes lined permeable paving which serves the self-drained paved area of the driveway. The roof areas require separate interception drainage to accord with requirements within the NSfS.
- 2.3. Evidence has not been provided to justify the lack of interception drainage for the buildings provided as part of the sustainable drainage design. Inception drainage is not currently in accordance with the requirements of the NSfS (Standard 2). Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. Despite the low peak flow in the context of the public sewer network, there is a risk of rejection of connection and therefore confirmation is required from the Sewerage Undertaker at planning stage that capacity exists.
- 3.2. The design flow restriction is 1.0 litre per second which is a significant increase on the greenfield runoff rates for the drained area. The applicant should investigate restricting the peak runoff to greenfield runoff rates or as close as practicable using appropriate modern flow control devices and blockage protection for source control. The NSfS states a multiple of 5 times GFR for the 50% AEP and 1% AEP storm should be considered the maximum for brownfield sites if greenfield runoff rates are not possible. Blockage risk is low due to the use of permeable pavement.
- 3.3. No downstream surcharge is applied but it is likely that the sewer system would be surcharged during the design storm. The designer should incorporate a downstream surcharge based upon a robust assumptions of downstream top water level.
- 3.4. Exceedance flow paths should be shown on the drainage layout.
- 3.5. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS (Standard 3). Therefore, we **object** to the application.

4. Water quality

- 4.1. The proposed water quality mitigation provided by tanked permeable paving is acceptable.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality.
- 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. However, permeable paving and water butts are incorporated and the opportunities beyond this for small scale residential development on a site of this size is limited. Therefore, a relaxation is for Amenity design based upon the limited opportunity at the site and scale of development is accepted.

6. Biodiversity

- 6.1. The BNG assessment confirms the proposals result in a loss of habitat but a gain in hedge units.
- 6.2. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.3. 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.
- 6.4. However, the submission of such evidence 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 details of biodiversity benefits.
- 6.5. Biodiversity value could be incorporated into the drainage system through additional landscaping features such as rain gardens and 'SuDS planters', for example.

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

- 7.1. An outline maintenance and operation plan has not been provided within the Drainage Statement. However, as the drainage system is private and within a single ownership, this aspect can be the subject of a planning condition.

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:

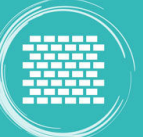
- ☐ Landscaping officer (proposed trees and landscaping)
- ☐ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public 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

PL- Consultation- Engineers response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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

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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	 Our core foundations	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 16 March 2026 16:15
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: P/6/26/PL

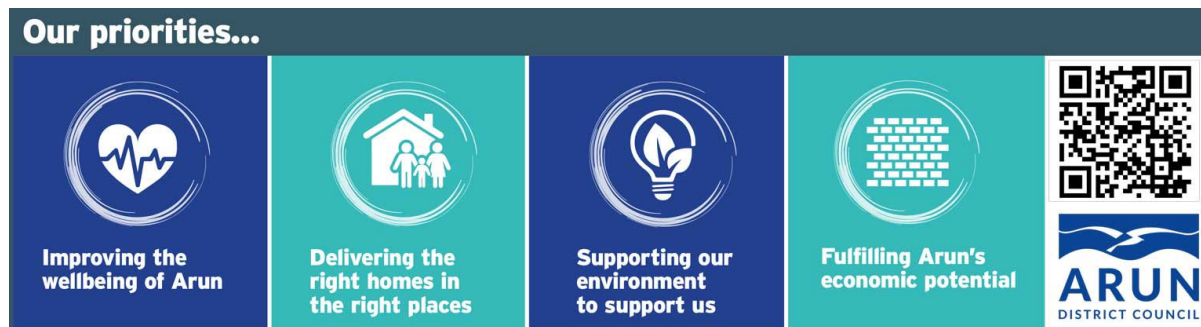
Please find enclosed our consultants revised response, to replace that submitted in the email below.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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From: Paul Cann
Sent: 16 March 2026 15:05
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: P/6/26/PL

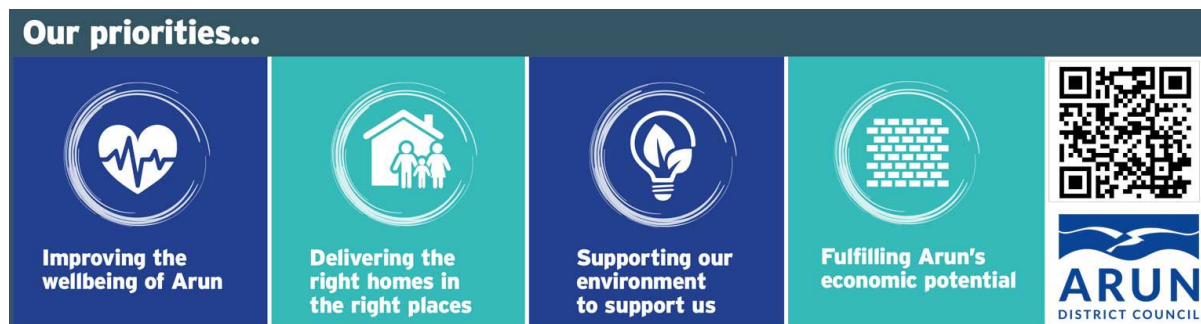
Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 18 February 2026 09:34

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

Subject: Planning Consultation on: P/6/26/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/6/26/PL
Registered: 16th February 2026
Site Address: Fairhaven Nyetimber Lane Pagham PO21 3JT
Grid Reference: 489413 98520
Description of Works: Construction of 3 No detached chalet bungalows together with alterations to existing dwelling with the provision of modified access, parking & landscaping. This application is in CIL Zone 4 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 19th March 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

Harry Chalk

Planning Officer- Arun District Council

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