Engineers Comments Regarding Surface Water Drainage

Application Reference:	**AL/39/26/HH**	**Reviewer Reference:**	ADC/EXT5/AF
Planning Officer:	Silvie Steiningerova	**Date of Review:**	03/07/2026
Site Name:	Long Meadow Dukes Road Fontwell BN18 0SP		
Application Description:	Detached annexe with basement storage		
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**

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	**Objection**
2. Interception drainage	Compliant	**Further information**
3. Extreme Rainfall and Flooding	Insufficient	**Objection**
4. Water Quality	Insufficient	**No objection subject to conditions**
5. Amenity	Insufficient	**No objection**
6. Biodiversity	Insufficient	**No objection**
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	**No objection**

Reviewed Plans

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

-FRA
-Lidsey Drainage Assessment
-Site plan and location plan

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

-N/A

Consultation comments to the planning officer

0. General
   - 0.1. The application is for householder development including a detached annex which will increase the drained area at the site. The works are not permitted development and therefore sustainable drainage proportionate to the nature and scale of the proposal is required by NPPF Paragraph 182.
   - 0.2. The site is not at significant risk of flood from external sources as indicated by our datasets and further information on external flood risk is not required.
   - 0.3. The submission fails to identify that the site is within a Zone 2 Source Protection Zone. The Environment Agency and Portsmouth Water should be consulted regarding the suitability of soakaways.

1. Runoff destination
   - 1.1. The water reuse priority can be addressed at detailed design stage by providing residential water butts.
   - 1.2. The submitted statement on drainage states that surface water will be discharged to ground via infiltration but no ground investigation is provided to prove feasibility and no other alternative means of disposal is demonstrated to be feasible.
   - 1.3. Guidance on ground investigation to support proposals to discharge to ground via infiltration is provided on Arun DC web pages here: https://www.arun.gov.uk/surfacewater.
   - 1.4. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage
   - 2.1. Interception drainage is currently provided by the proposed strategy to discharge rainwater to ground. The proposal will need to be reviewed if the runoff destination is not feasible.
   - 2.2. If infiltration is not feasible it may be necessary to provide some form of evapotranspiration provision to address interception drainage. This may be able to be achieved through SuDS planters or similar for the relatively small area of increased drained area.

3. Extreme rainfall and flooding
   - 3.1. The outline calculations provided for the drainage system are not in accordance with sustainable drainage standards. The additional area should be attenuated, or the infiltration feature sized to accommodate large return period storms.
   - 3.2. The drained area should be clarified and runoff calculated for the design storm based upon up to date rainfall data. Guidance is provided on ADC webpages - https://www.arun.gov.uk/surfacewater.
   - 3.3. The external stair case appear to be open to rainfall which could collect at the base and flood the basement. The design should be clarified.
   - 3.4. 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. No assessment for water quality is provided with the application and water quality mitigation is not currently incorporated into the design.
   - 4.2. However, there is no new trafficked areas shown on the layout and measures to mitigate runoff from roof areas and paths are likely to be able to be integrated at technical design stage.

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.

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.

7. Construction, operation, maintenance, decommissioning and structural integrity
   7.1. A maintenance plan for the drainage system has not been submitted but the site is within a single ownership and management and this aspect can be addressed as part of the technical 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 ……
☐ None

[redacted]

PL- Consultation- Engineers response

[redacted]

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 08 July 2026 09:20
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Silvie Steiningerova <Silvie.Steiningerova@arun.gov.uk>
Subject: RE: Planning Consultation on: AL/39/26/HH

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Littlehampton, West Sussex, BN17 5LF
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 09 June 2026 16:03
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: AL/39/26/HH

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission for Works or Extension to a Dwelling

Application No:	**AL/39/26/HH**
Registered:	8th June 2026
Site Address:	Long Meadow Dukes Road Fontwell BN18 0SP
Grid Reference:	494775 107465
Description of Works:	Detached annexe with basement storage.

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 on site 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 9th July 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.

When the appeal relates to a householder application there will be no opportunity to make further comments.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Silvie Steiningerova

Planning Officer- Arun District Council

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Email: silvie.steiningerova@arun.gov.uk