

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/103/25/HH	Reviewer Reference:	ADC/KW
Planning Officer:	Silvie Steiningerova	Date of Review:	02/02/2025
Site Name:	Sundance, Yapton Road		
Application Description:	Side extension to bungalow and internal alterations. Re roofing with standing seam metal roof and additional insulation.		
Assessment Number:	1 of 1		

Policy and Guidance Information
<p>Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater</p> <p>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/</p> <p>Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/</p> <p>Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions</p> <p>The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</p> <p>The SuDs Manual [C753] by CIRIA</p>

Response	Objection

References
<p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p>

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	Insufficient	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	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	Insufficient	Objection.

Reviewed Plans

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

- **Lidsey Drainage Impact Assessment**

Consultation comments to the planning officer

0. General

0.1. Insufficient information regarding surface water drainage has been submitted to evidence that flood risk will not be increased as due to the proposed development.

1. Runoff destination

1.1. It is proposed to manage surface water on via infiltration to the ground via a soakaway. Whilst we support this approach in principle, as infiltration is the highest priority in the drainage hierarchy and aligns with Standard 1 of the NSfS, insufficient evidence has been provided to demonstrate that infiltration is a viable solution. It is the responsibility of the applicant or their drainage designer to provide this evidence. Without it, we are unable to assess whether the proposed development would increase flood risk. The applicant has also not provided evidence to support the next proposed

discharge location. For this reason, **we object to the proposal**. The submission of such evidence may also affect the scale and layout of the development.

- 1.2. To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of 1 metre of unsaturated ground can be maintained between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential in Barnham are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.
 - 1.3. If infiltration is not viable, then alternative sustainable means of draining the site are summarised as follows:
 1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
 2. Infiltration – not investigated.
 2. To a watercourse – found approx. 40m to the west of site running north-south.
 3. To a surface water sewer – none available.
 4. To a highway drainage system – none available according to our records.
 5. To a combined sewer – none available.
 - 1.4. It is essential that each discharge destination is considered in strict priority order, with higher priority options fully explored and demonstrably exhausted before progressing to lower priority alternatives. Robust evidence must be provided to discount a higher priority destination.
 - 1.5. An Ordinary Watercourse can be found to the west of site running along the boundary between The White House and Saxby. This option has not been investigated. Permission to discharge into a surface water sewer will need to be obtained from the relevant owners/authorities and provided to the Authority, along with specific information including agreed discharge rates and hydraulic capacity checks. Consent may also be required from the LLFA for any proposed works to the watercourse.
 - 1.6. In additional Arun District Council consent relating to the Land Drainage Bylaws may also be required. Please contact ADC at land.drainage@arun.gov.uk. If permission from the relevant authority is not obtained for the principle of discharging to the watercourse, then it is unclear how the applicant may drain surface water from the site.
 - 1.7. The application site is in the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a surface water management plan due in part to the recognised history of foul sewer flooding. Therefore, it is important to ensure that future development does not exacerbate this problem.
2. Interception drainage
- 2.1. The applicant has proposed water butts. In recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.

infiltration features designed to meet extreme rainfall standards.

- water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
- raingardens and bioretention features attached to all new downpipes.
- permeable surfacing.

2.2. These features will not affect the scale or layout of development and as such can be secured by condition.

3. Extreme rainfall and flooding

3.1. A small section of surface water flood risk can be found to the rear garden in the south western corner of the site. The design must either account for the volume of water entering the site from elsewhere or ensure that no SuDS features are located within this area and that ground levels are not altered. For further guidance, please refer to our 'SuDS in Flood Areas' document available online at www.arun.gov.uk/surfacewater.

3.2. At present, no modelling or supporting evidence; such as ground investigations or drainage plans have been submitted for engineering assessment. In the absence of this evidence, we cannot assess if flood risk will be increased by the surface water drainage of the proposed development. Therefore, this application does not accord with the NPPF as set out above and we object on these grounds.

4. Water quality

4.1. Insufficient evidence of water quality benefits has been provided, and as such, Standard 4 of the NSfS has not been met. However, the submission of this evidence 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. Insufficient amenity benefits arising from the proposed SuDS have been identified, and therefore Standard 5 of the Systems NSfS has not been met. 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 amenity benefits.

6. Biodiversity

6.1. Insufficient biodiversity benefits arising from the proposed SuDS have been identified, and therefore Standard 6 of the Systems NSfS has not been met. 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.

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

7.1. A significant number of trees can be found surrounding site; this may significantly impact the ability to infiltrate to the ground or discharge to the ordinary water course.

7.2. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. As a result of the existing trees which could impact the scale and layout and location of SuDS features, as such it is not appropriate to secure details via condition. Accordingly, **we object to the proposal on this ground**, and require the applicant to provide details of existing trees and plans that demonstrate that any SuDS features do not conflict with them to ensure compliance with Standard 8 of the NSfS.

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

From: Elaine Walby on behalf of Planning.Responses
Sent: 03 February 2026 12:06
To: Planning Scanning
Subject: FW: BN/103/25/HH
Attachments: BN-103-25-HH Sundance, Yapton Road.docx

PL- Consultation- Engineers response







Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

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

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	 
--	---	---	---	--	---

Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 02 February 2026 12:43
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Silvie Steiningerova <Silvie.Steiningerova@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: BN/103/25/HH

Please find attached the engineers response; an objection.

Many thanks,

Kathryn Welch
Senior Planning Officer, Planning Department







Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

T: 01903 737789
E: kathryn.welch@arun.gov.uk

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



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	 
--	---	---	---	--