

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/114/25/PIP	Reviewer Reference:	ADC/KW/SB
Planning Officer:	Mr S Davis	Date of Review:	05/12/2025
Site Name:	Land to the rear of Watermead, Yapton Road, PO22 0BQ		
Application Description:	Application for permission in principle for a minimum net gain of 1 dwelling to a maximum net gain of 1 No dwelling.		
Assessment Number:	1 of 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

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 assessment has been submitted.	Objection
2. Interception drainage	Not applicable (PIP)	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient - No assessment has been submitted.	Objection
4. Water Quality	Not applicable (PIP)	No objection subject to conditions
5. Amenity	Not applicable (PIP)	No objection subject to conditions
6. Biodiversity	Not applicable (PIP)	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Not applicable (PIP)	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:

None provided

Consultation comments to the planning officer

0. General
0.1.

1. Runoff destination

- 1.1. This site is located in the Lidsey Treatment Catchment and in an area where ADC have had historic involvement due to issues relating to surface water drainage and the ordinary watercourses around the site.
- 1.2. The site has a watercourse on the western boundary and there are also watercourses on the eastern and northern boundaries of the title (the blue line boundary). To facilitate the proposed development the applicant may need to carry out works to these watercourses, further investigation is required relating to land ownership and the necessary works. The applicant is guided to approach West Sussex County Council regarding land drainage consent – see links above.
- 1.3. However, we would expect infiltration to be fully investigated and ruled out before the option of connecting to the culverted ordinary watercourse is explored further.
- 1.4. Standard 1 of the NSfS sets out the following hierarchy of sustainable means of draining the site:
 - Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
 - Infiltration – may be viable, but not investigated – see below.
 - To a watercourse – available but not investigated.
 - To a surface water sewer – none available.
 - To a highway drainage system – None available
 - To a combined sewer – none available.
- 1.5. 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.
- 1.6. Apart from 'water reuse', infiltration is the next highest priority discharge location. Infiltration viability can only be confirmed with site investigations, including groundwater monitoring and infiltration testing. 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.
- 1.7. It is likely that a viable discharge location can be evidenced, however on the basis on the information submitted, the applicant has not demonstrated that any of the potential discharge locations are viable. On this basis **we object** to the proposal. **The submission of the required evidence may also have implications on the amount of development achievable.**
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. Therefore, it is not a reason for objection and can be assessed when the Technical Details application is made.

- 2.2. 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.
 - 2.3. Where infiltration has not been proven to be viable (as here) and there is a risk that interception drainage may only be delivered by evapotranspiration this can have significant impact on the scale and layout of the proposed development.
3. Extreme rainfall and flooding
 - 3.1. The site is in Flood Zone 1, however there are pockets of surface water flooding found on site.
 - 3.2. Due to the location and ongoing issues relating to surface water in the area careful oversight of the surface water drainage of the site will be required to ensure that flood risk is not increased on or off site due to the proposed development.
 - 3.3. It is expected that an existing culvert found on site will need to be upgraded to facilitate a formal access. We are also aware of a section of infilled ditch on the east of the site which causes unrestricted overland flow towards this site. This will need to be accounted for in the SuDS design.
 - 3.4. At present, no modelling or supporting evidence; such as ground investigations or drainage plans have been submitted for engineering assessment. In the absence this evidence, we cannot assess if flood risk will be increased by the surface water drainage of the proposed development and **an objection** is raised. Therefore, this application does not accord with the NPPF as set out above.
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. Therefore, it is not a reason for objection and can be fully assessed when the Technical Details application is made.
 - 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.**
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. Therefore, they are not a reason for objection and can be assessed when the Technical Details application is made.
 - 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 the Technical Details application is made.

From: Nicola Spencer on behalf of Planning.Responses
Sent: 11 December 2025 16:05
To: Planning Scanning
Subject: FW: Planning Consultation on: BN/114/25/PIP
Attachments: BN-114-25-PIP Land to the rear of Watermead.docx

PL- Consultation -Engineers response

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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>



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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

From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 10 December 2025 09:20
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/114/25/PIP

Please find attached the engineers response; an objection.

Kind regards,

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

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Delivering the right homes in the right places

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 11 November 2025 08:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BN/114/25/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: BN/114/25/PIP
Registered: 7th November 2025
Site Address: Land to the rear of Watermead Yapton Road Barnham PO22 0BQ
Grid Reference:
Description of Works: Application for permission in principle for a minimum net gain to a maximum net gain of 1 No dwelling.

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 30th November 2025 . 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

Harry Chalk

Planning Officer- Arun District Council

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