

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BN/42/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Jonny Cooper	Date of Review:	01/07/2026
Site Name:	5 Tattersalls Road, Fontwell, BN18 0ZA		
Application Description:	Single storey rear extension.		
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
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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	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:

Surface Water Drainage Strategy and Foul Water Drainage Statement (SWDS)

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. The submitted SWDS states that surface water will be infiltrated to the ground. Whilst the principle of infiltration is the highest priority discharge location and accords with Standard 1 of the NSfS, no ground investigations (infiltration testing and groundwater monitoring) have been provided to confirm that infiltration on site is viable.

- 1.2. As insufficient evidence has been submitted to demonstrate how the applicant intends to drain surface water, we are unable to assess whether the proposed development would increase flood risk. It is the responsibility of the applicant or their drainage designer to provide this evidence. For this reason, we **object to the proposal**, as the submission of such evidence may affect the scale and layout of the development.
- 1.3. To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of one 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 Fontwell 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.
- 1.4. It should be noted that the overall development upon which this property is located, currently discharges surface water to communal infiltration structures. However, it is possible that the existing system does not achieve the minimum one metre freeboard stated in item 1.3, due to recent changes in requirements. It is up to the applicant to evidence such, should a connection to the existing system be sought.
- 1.5. The applicant must ensure that the proposed extension/patio does not cause detriment to any pipework/manhole access associated with the surface water drainage system serving the existing development.
- 1.6. 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 – none we are aware of.
 3. To a surface water sewer – none available.
 4. To a highway drainage system – a highway drain lays approximately 100m to the west, running adjacent to the A29. See item 1.8.
 5. To a combined sewer – none available.
- 1.7. 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.
- 1.8. The applicant has not provided any further information on how they may drain the site if infiltration is later found to be unviable or whether the connection to the highway drainage system can be achieved. It should be noted that such connections are often resisted by West Sussex County Council, the asset owner.
- 1.9. 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.

2. Interception drainage

2.1. Interception features should be included within the SuDS design. The applicant proposes permeable paving for areas of hardstanding. However, if infiltration proves unviable, additional interception features will be required. 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 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. The entire site is part of a Groundwater Source Protection Zone. If infiltrating features are located in this area, then the Environment Agency and Portsmouth Water should be consulted. It is expected that if infiltration is shallow (as proposed) then they are unlikely to object.

3.2. A set of simulation storm calculations has been provided; however these are based on assumed infiltration rates and do not therefore represent an accurate representation of site-specific conditions.

3.3. Details and calculations have been provided to evidence storage within the permeable paving to the rear of the property. However, without having proven that infiltration on-site is viable, this remains indicative of a potential proposal. Please note, as infiltration remains unproven, a detailed check of the submitted calculations has not been undertaken at this time. In the absence firm 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** to the proposal.

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. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. However, in the absence of significant existing trees which could impact the scale and layout and location of SuDS features, most elements of this standard can normally be secured via condition. The submission of a Management and Maintenance Plan 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 the detailed surface water drainage design.

8. 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



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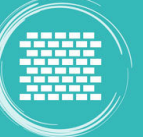
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 08 July 2026 11:19
To: Jonny Cooper <Jonny.Cooper@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: BN/42/26/HH

Please find the engineers response attached; 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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