

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LY/13/25/PL	Reviewer Reference:	ADC/EXT2/89
Planning Officer:	Amber Willard	Date of Review:	03/03/26
Site Name:	Back Arun Fishery North of Arundel Station Arundel BN18 9JJ		
Application Description:	Siting of 3 No. temporary structures and associated works. This application is in CIL Zone 3 (Zero Rated) as other development.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
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:

- EXISTING SITE PLAN
- PROPOSED BLOCK PLAN
- FLOOR PLANS AND ELEVATIONS VERSION #2
- LOCATION PLAN
- FRA
- GOOGLE EARTH AERIAL PHOTOGRAPH (DATED 2001)

Consultation comments to the planning officer

0. General

- 0.1. The FRA states in the section titled Surface Water Flood Risk Mitigation "The applicant has confirmed that the area where the proposed units will be installed is already underlain by hardstanding" Based on the drawings included in the FRA and satellite imagery, this does not appear to be the case, however an aerial photograph dated 2001 has been provided showing hard standing.
- 0.2. It also states "As such it is considered that the development in its current form will not lead to a significant increase in surface water run off rates and volumes when compared to the pre-developed

situation, and a surface water drainage strategy is not required". It then goes on to give advice regarding drainage proposals. Given that the proposed units appear to be located on areas that are not currently underlain by hardstanding, and advice is given regarding drainage features, a drainage strategy is required showing that the proposals meet the requirement of the National Standards.

- 0.3. It is noted that the buildings are temporary and the development is small in scale, so the applicant may wish to assess if it is appropriate to justify departures from some of the standards. Attention is drawn to the summary above which states that failure to address the 7 standards is likely to result in an objection.
- 0.4. It is further noted that moss/scrub has grown over the existing hardstanding which could affect the current rate/volume of surface water runoff. The applicant should comment on the effect that the removal of this overgrowth will have in respect of surface water drainage/flood risk.

1. Runoff destination

- 1.1. No information has been provided

2. Interception drainage

- 2.1. No information has been provided

3. Extreme rainfall and flooding

- 3.1. No information has been provided

4. Water quality

- 4.1. No information has been provided

5. Amenity

- 5.1. No information has been provided

6. Biodiversity

- 6.1. No information has been provided

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

- 7.1. No information has been provided

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.

8.4. In order to overcome the objection, the applicant should submit information demonstrating how the critical items above have been addressed or the justification for departures from the 7 standards. Information should also be provided demonstrating that the removal of the overgrowth from the existing hardstandings will not be detrimental from a surface water drainage/flood risk point of view.

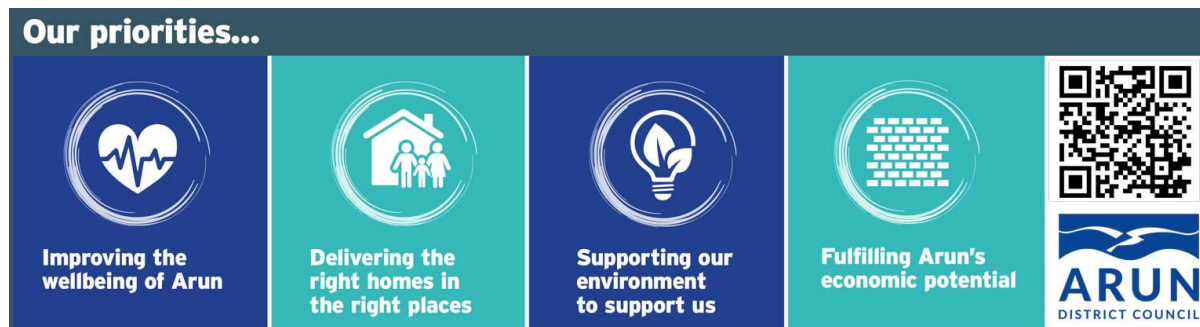
Drainage Impact on Other Planning Matters

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: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 29 January 2026 17:18

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

Subject: Planning Consultation on: LY/13/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LY/13/25/PL
Registered: 10th December 2025
Site Address: Back Arun Fishery North of Arundel Station Arundel BN18 9JJ
Grid Reference: 502195 106618
Category: Plan Applicat'n
Description of Works: Siting of 3 No. temporary structures and associated works. This application is in CIL Zone 3 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 29th January 2026 relating to:- Email showing development on hardstanding

If you should wish to make further representations as a result of this amendment, please make any further comment by **20th February 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Amber Willard

Planning Case Officer- Arun District Council

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