

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/100/25/PL	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Harry Chalk	Date of Review:	09/01/2025
Site Name:	Sunny Corner, Copse Lane, BN18 0QH		
Application Description:	1 No. self build dwelling, garage and outbuilding with associated landscaping.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 – part of the final discharge location requires access via a wooded area.	Objection.

Reviewed Plans

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

Site Investigations Report
Flood Risk 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 that surface water is drained to a shallow seepage trench, which would allow some infiltration to the ground but would predominantly direct water off site via natural flow paths to land to the north-west, ultimately discharging to ponds and a watercourse to the west. No formal drainage layout has been provided, and only a brief description of the proposal has been submitted.

- 1.2. While infiltration is the preferred surface water management option within the drainage hierarchy, following water reuse, and accords with Standard 1 of the National Standards for Sustainable Drainage Systems (NSfS), the applicant has not adequately demonstrated that a fully infiltrating scheme is unviable. Nor has it been confirmed to what extent infiltration may be achievable, having regard to the principle that each discharge location should be maximised to its full potential.
- 1.3. Infiltration testing has not been undertaken appropriately, and full results have not been provided to justify the use of partial infiltration on site. 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.
- 1.4. Boreholes have been installed on site and groundwater data collected. This information appears to suggest that groundwater levels are high and has been used to justify limiting infiltration. However, this monitoring has not been undertaken in accordance with the SuDS Manual and is therefore not considered reliable. Monitoring on a site of this scale should be undertaken over a minimum period of two consecutive months, with regular readings. All data, including the precise locations of monitoring points, should be clearly recorded on a plan. Full details of the Council's basic groundwater monitoring requirements are available at: <https://www.arun.gov.uk/groundwater-monitoring>.
- 1.5. Furthermore, insufficient evidence on the natural drainage characterises or flow routes of the site, or details surrounding the watercourse have been provided in respect of the proposed alternative discharge location, should full infiltration prove unfeasible. The Lead Local Flood Authority (LLFA - WSCC) is the risk management authority for the ordinary watercourse. No evidence has been submitted to demonstrate that the proposed discharge rates, volumes or flow parameters have been agreed with them. This is an expectation of the NSfS. 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. It is also noted that drainage would need to be directed via a section of ancient woodland. As it cannot be allowed to informally drain and formal drainage features would be required, no evidence has been submitted to show that there would be no conflict between the SuDS features and the trees.
- 1.8. As a result, it has not been demonstrated that the site can be drained sustainably, an **objection is therefore raised to the proposal**.
- 1.9. As stated above, surface water from the site must be managed in accordance with the drainage hierarchy (Standard 1 of the NSfS). If infiltration is found to be unviable, 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, proposed in part
3. To a watercourse – available to the northwest of site on land under the ownership of the applicant (but does not form part of the application site), not investigated, proposed in part.
3. To a surface water sewer – none available
4. To a highway drainage system – none available
5. To a combined sewer – none available.

1.10. 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.

1.11. 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 drainage statement has not proposed any interception features. 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. At present, no modelling or supporting evidence; such as ground investigations, discharge rates and volumes 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. Therefore, this application does not accord with the NPPF as set out above.
For this reason 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. An open storage feature is proposed, however without evidence that infiltration is viable on site this SuDS feature is unproven. 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. An open storage feature is proposed, however without evidence that infiltration is viable on site this SuDS feature is unproven. 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. It appears that the proposed SuDS would run through a significant wooded area, this 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:

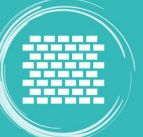
- ☐ Landscaping officer (proposed trees and landscaping)
- ☒ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public 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

PL-Consultation- Engineers response

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>

Sent: 14 January 2026 10:09

To: Planning.Responses <Planning.Responses@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>

Cc: Paul Cann <Paul.Cann@arun.gov.uk>

Subject: WA/100/25/PL - Sunny Corner

Please find the engineers response attached; 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

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