

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/33/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	04/06/2026
Site Name:	The Greenway, West Walberton Lane, BN18 0QS		
Application Description:	Construction of a self-build/custom build single dwelling, with garage outbuilding and associated works.		
Assessment Number:	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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Further Information

Reviewed Plans

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

- Flood Risk Assessment & Drainage Strategy 2026-04-10-6947-FRA02 (FRADS)

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

N/A

Consultation comments to the planning officer

0. General

- 0.1. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.2. The development is not at significant risk of flooding from external sources and no further assessment of external flood risk is required.
- 0.3. 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.
- 0.4. The existing trees on the eastern side of the access drive have root protection areas that conflict with the proposed permeable paving. It is also noted that root protection measures may significantly encroach within the root protection areas of some trees along the eastern boundary of the site. The Planning Officer may wish to consult the Arboriculture Officer for their views on this matter.

1. Runoff destination

- 1.1. It is proposed to install a number of rainwater harvesting planters, with final discharge of surface water to soakaways, permeable paving and an open storage feature in the rear garden area. Water re-use and infiltration to the ground are the highest priority discharge methods and accord with Standard 1 of the Non-Statutory SuDS Standards (NSfS).
- 1.2. Ground investigations have been undertaken on site, including two groundwater monitoring boreholes and two infiltration pits, which indicate that there is sufficient freeboard on site and acceptable infiltration rates. This demonstrates that infiltration is viable. Infiltration rates of 6.07×10^{-6} m/s and 7.87×10^{-6} m/s have been recorded which is viable for discharge to ground.
- 1.3. Infiltration tests were undertaken at depths of 1.0 m and 1.05 m below ground level. The permeable paving adjacent to the dwelling appears to have a depth of approximately 600-700mm below ground level depending on the finished levels design. The ground investigation is sufficient for planning stage to demonstrate the feasibility of the strategy. Further investigation at the location and depth of the proposed features will be required at discharge of conditions stage to evidence the effectiveness of the technical design.

2. Interception drainage

- 2.1. Interception drainage is achieved through discharged to ground via infiltration.

3. Extreme rainfall and flooding

- 3.1. The FRADS includes drainage plans and modelling. The design is well progressed for planning stage. Please add base levels for all storage features.
- 3.2. It is noted that the basin has applied infiltration rates to both the sides and base of the feature, this should be adjusted to demonstrate infiltration through the base of the feature only. A suitable factor of safety should be applied to the basin infiltration rate considering drained area and consequence of failure (which may flood third party land).
- 3.3. The simulation inputs should be shown for the Site 3D calculations including rainfall profile and Cv value.
- 3.4. The areas, depths and effective storage depths of permeable paving is not clear from the calculation outputs. Evidence of drainage model inputs should be provided.

- 3.5. Please provide clarification as to how the permeable driveway with existing trees is designed and included in the drainage calculations in terms of how the storm water will be stored whilst retaining root protection areas which typically require 'no dig' construction.
- 3.6. The design does not currently meet the requirements of Standard 3 of the NSfS, therefore we **Object** to the application. The objection may be able to be removed once further information is reviewed.

4. Water quality

- 4.1. The submission includes a water quality assessment which demonstrates that the water quality standards are met.

5. Amenity

- 5.1. The design provides amenity benefit with a multifunctional open feature which provides visual amenity and landscape character appropriate to the scale and nature of development.

6. Biodiversity

- 6.1. The design provides an open storage feature which it is acknowledged that such a feature will have a positive impact on biodiversity net gain (BNG). No formal assessment of this has been provided by the applicant but the proposals include an open water feature and are proportionate to the scale and nature of development in accordance with NPPF paragraph 182. We therefore have no objection.

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

- 7.1. An outline maintenance plan is provided which is proportionate to the scale and nature of development as the dwelling will be in a single ownership.
- 7.2. There are a significant number of good quality trees on the site, most of which are to be retained. These existing trees are a constraint to the drainage strategy as any drainage installations should not damage the trees, and the drainage infrastructure itself needs to be protected from tree root damage. The design as submitted demonstrates areas of conflict with the existing trees and their current root protection areas which will require root protection construction methods.

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



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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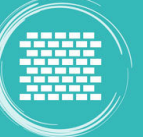
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 04 June 2026 09:04
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/33/26/PL

Please find enclosed our consultants updated response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



From: Paul Cann
Sent: 29 May 2026 13:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/33/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 30 April 2026 19:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: WA/33/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: WA/33/26/PL
Registered: 29th April 2026
Site Address: The Greenway West Walberton Lane Walberton BN18 0QS
Grid Reference: 496065 106607
Description of Works: Construction of a self-build/custom build single dwelling, with garage outbuilding and associated works. This is a departure from the local development plan and is in CIL Zone 3 and is CIL liable as a new dwelling.

The Council have received the above application.

[Click here to view the application 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.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 5th June 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

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

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk

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