

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                    |                            |            |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------|
| <b>Application Reference:</b>   | <b>WA/55/26/HH</b>                                                                                                                 | <b>Reviewer Reference:</b> | ADC/KW/PC  |
| <b>Planning Officer:</b>        | Silvie Steiningerova                                                                                                               | <b>Date of Review:</b>     | 14/08/2026 |
| <b>Site Name:</b>               | Woodfield House, Arundel Road, Fontwell, West Sussex, BN18 0SD                                                                     |                            |            |
| <b>Application Description:</b> | Two storey side and rear extension, single storey front porch extension, following demolition of existing side and rear extension. |                            |            |
| <b>Assessment Number:</b>       | 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

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 | <b>Objection</b>                          |
| 2. Interception drainage                                                          | Insufficient | <b>No objection subject to conditions</b> |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient | <b>Objection</b>                          |
| 4. Water Quality                                                                  | Insufficient | <b>No objection subject to conditions</b> |
| 5. Amenity                                                                        | Insufficient | <b>No objection subject to conditions</b> |
| 6. Biodiversity                                                                   | Insufficient | <b>No objection subject to conditions</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient | <b>No objection subject to conditions</b> |

## Reviewed Plans

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

**Biodiversity Enhancement Statement and Lidsey Drainage Impact 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 to drain the surface water from the extension to a new soakaway on site. Whilst infiltration to the ground is the second-highest priority option (aside from water re use) and accords with Standard 1 of the NSfS, insufficient evidence has been submitted. As such, 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.

- 1.2. To support an infiltration-based design, winter groundwater monitoring must be undertaken and provided to us, 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 Walberton 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. Further details relating to groundwater monitoring, infiltration testing and other design aids, can be found at <https://www.arun.gov.uk/surfacewater>.
- 1.3. Standard 1 of the NSfS outlines the following hierarchy of sustainable means of draining a site, comments are provided regarding the viability of these options on this site:
  1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
  2. Infiltration –not investigated.
  3. To a watercourse – an ordinary watercourse can be found 280m to the east (Connectivity to wider system unknown).
  4. To a surface water sewer – none available
  5. To a highway drainage system – located to the southern side of Arundel Road, based upon our records.
  6. To a combined sewer – none available.
- 1.4. 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.
- 1.5. The Lead Local Flood Authority (LLFA - WSCC) is the risk management authority for the ordinary watercourse. Evidence will need to be submitted to demonstrate that they have consented to any proposed works through the Ordinary Watercourse Consent process. Furthermore, the proposed discharge rates, volumes or flow parameters will also need to be agreed by this Authority to support the Ordinary Watercourse Consent. Land Drainage Byelaw consent may also be required from ourselves. This is an expectation of the NSfS.
- 1.6. There is a public highway drain found in the verge to the southern side of the Arundel Road. This is controlled by West Sussex County Council and permission to connect would be required from them (but permission often resisted). No evidence or permission has been provided to confirm whether discharge to these highway drainage systems would be permitted, or whether the drains have sufficient hydraulic capacity.
- 1.7. The application site falls within the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a Surface Water Management Plan due, in part, to a recognised history of foul sewer flooding.

## 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 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. 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. 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

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

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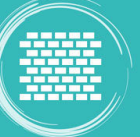
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**From:** Kathryn Welch <Kathryn.Welch@arun.gov.uk>  
**Sent:** 19 August 2026 09:48  
**To:** Silvie Steiningerova <Silvie.Steiningerova@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Joe Dixon <Joe.Dixon@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>  
**Subject:** WA/55/26/HH

Please find the engineers consultation 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

**T:** 01903 737789  
**E:** [kathryn.welch@arun.gov.uk](mailto:kathryn.welch@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

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