

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                 |                            |            |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------|
| <b>Application Reference:</b>   | <b>WA/70/25/HH</b>                                                                                                                                              | <b>Reviewer Reference:</b> | ADC/KW/SB  |
| <b>Planning Officer:</b>        | Rhiannon Lloyd                                                                                                                                                  | <b>Date of Review:</b>     | 06/10/2025 |
| <b>//Site Name://</b>           | Walberton House, The Street BN18 0PJ                                                                                                                            |                            |            |
| <b>Application Description:</b> | Installation of detached car port. (This application may affect the character and appearance of the Walberton Village Conservation Area and a listed building). |                            |            |
| <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>Objection</b>                          |

## Reviewed Plans

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

**Email dated 4 September 2025 and uploaded to the portal 10 September 2025**

## 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. No formal drainage strategy has been provided. It is proposed that surface water runoff from the pitched roof will drain naturally onto the grass surface surrounding the carport. This represents an informal and unknown drainage solution which would not be acceptable. It is unknown what infiltration potential the landscaped area has, or whether surface water from the new roof would discharge overland and ultimately into neighbouring property, increasing their flood risk. Therefore,

we **object** to the proposal, it has not been demonstrated that the surface water drainage for the carport will not increase flood risk.

1.2. Having reviewed our records we also raise concern about the viability of drainage disposal options that are available to the applicant. The runoff destination shall comply with the hierarchy for sustainable drainage which can be summarised as follows:

- Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
- Infiltration – may be viable, but not investigated – see below.
- To a watercourse – none available.
- To a surface water sewer – none available.
- To a highway drainage system – Highway's surface water drainage gullies serving soakaways are present adjacent to the northern boundary, however, it would be up to the applicant to evidence that WSCC give their consent to drain into these soakaways and to prove that they have the capacity to accept the required volume of surface water. Connection to the highway drainage network is generally resisted by the owner.
- To a combined sewer – none available.

1.3. 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.

1.4. **Surface water must not be discharged into the foul sewer.** The foul sewer is not a recognised disposal location in the Standard 1 of the NSfS. It is important to recognise that combined sewers are intentionally designed to take both foul and surface water runoff. Even if the foul sewer has the capacity to accommodate additional flows or has an element of surface water already in it, it is not considered combined.

1.5. Infiltration viability can only be confirmed with site investigations, including groundwater monitoring and infiltration testing. 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. 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.

1.6. If it is later demonstrated that infiltration is not viable, then the only option for surface water disposal that we are aware of is the highway drainage system. The applicant has no right to connect to this system, and such connections are strongly resisted.

1.7. 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. The site is within a local flood risk zone identified within the surface water management plan [LFRZ\_004]. The plan states that flood risk from pluvial water, groundwater and public sewers is high. It states that "hydraulic overload of the foul sewer system has been confirmed." Therefore, it is important to ensure that future development does not exacerbate this problem.

## 2. Interception drainage

2.1. No interception features have been proposed. 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. The northern boundary of site sits in an area at a high risk of surface water flooding. This may need to be accounted for by the surface water drainage design. The design may need to account for additional surface water volume entering the site from elsewhere and ensure that levels are not altered. For further guidance, please refer to our SuDS in Flood Areas document available online at [www.arun.gov.uk/surfacewater](http://www.arun.gov.uk/surfacewater).

3.2. 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.

## 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. There appears to be a number of significant existing trees which 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

[REDACTED]

Drainage Engineers response

[REDACTED]

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

To register to receive notifications of planning applications in your area please go to  
<https://www1.arun.gov.uk/planning-application-finder>



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**From:** Kathryn Welch <Kathryn.Welch@arun.gov.uk>  
**Sent:** 08 October 2025 14:25  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>  
**Cc:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: WA/70/25/HH

Please find attached the consultation response from the drainage engineers, an objection. Apologies for the delay in sending this to you.

Kind regards,

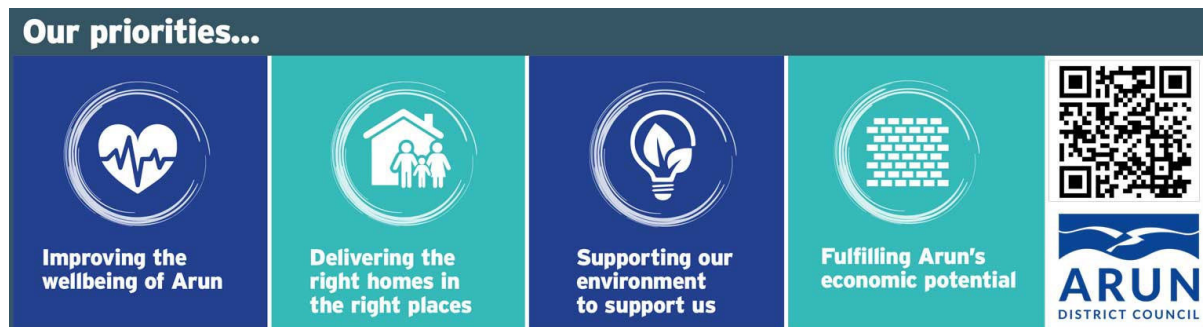
**Kathryn Welch**  
**Senior Planning Officer**, Planning Department

**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)

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 10 September 2025 13:04

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Consultation on: WA/70/25/HH

To: **Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

**Town & Country Planning Act 1990 (as amended)**

**Town & Country Planning (Development Management Procedure) (England) Order 2015**

**Planning Permission for Works or Extension to a Dwelling**

**Application No:** WA/70/25/HH

**Registered:** 4th September 2025

**Site Address:** Walberton House The Street Walberton BN18 0PJ  
**Grid Reference:** 497346 105781  
**Description of Works:** Installation of detached car port. (This application may affect the character and appearance of the Walberton Village Conservation Area and a listed building).

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.

Should you have any comments to make, these should be sent by replying to this email by 16th October 2025 . 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.

When the appeal relates to a householder application there will be no opportunity to make further comments.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Rhiannon Lloyd

Planning Officer- Arun District Council

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Email: [rhiannon.lloyd@arun.gov.uk](mailto:rhiannon.lloyd@arun.gov.uk)

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