

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/10/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	13/04/2026
Site Name:	Rookery Farm Flansham Lane Felpham PO22 6EP		
Application Description:	Partial demolition of agricultural building and erection of 1 No dwelling. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as a new dwelling.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Compliant	Further information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Further information
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

- LOCATION AND BLOCK PLANS 2601_001_PL0
- OWNERSHIP BOUNDARY
- EXISTING FLOOR PLAN, ELEVATIONS, ROOF PLAN, SECTION 18047_100_PL01
- PROPOSED FLOOR PLAN, ELEVATIONS, ROOF PLAN, SECTION 2601_200_PL0
- SURFACE WATER DRAINAGE 2601_250_PL0
- FRA
- Communication with Agent

Consultation comments to the planning officer

0. General

- 0.1. It is noted from correspondence on the planning file that the scheme plans may need to be altered to reflect a more comprehensive development. A Site Layout Plan which shows external works as well as buildings should be provided and the impermeable drained areas confirmed.
- 0.2. The development presented in the application documents is the demolition of an agricultural barn and construction of a single dwelling which will be served by a new drainage system and affect

drainage on and off site. Therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.

- 0.3. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.4. A Flood Risk Assessment [FRA] and Drainage Plan is submitted in support of the planning application. The FRA is substandard and should include flood risk mapping and identification of local hydrology and flow paths. However, from review of our datasets, the external flood risk to the development is low and we do not object on flood risk grounds.
- 0.5. The site may be within the future year Flood Zone 2 for Rivers and Seas and this should be addressed by the FRA and/or advised by the Environment Agency.

1. Runoff destination

- 1.1. The drainage plan indicates rain water harvesting tanks to provide collection for non-potable reuse of rainwater. This can be clarified as part of a technical design to discharge a planning condition.
- 1.2. The proposed method of discharge is to discharge to ground but the submission does not provide ground investigation to demonstrate this is method is feasible.
- 1.3. Guidance on ground investigation to support proposals to discharge to ground via infiltration is provided on Arun DC web pages here: <https://www.arun.gov.uk/surfacewater>.
- 1.4. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application

2. Interception drainage

- 2.1. Interception drainage is currently provided by the proposed strategy to discharge rainwater to ground. The proposal will need to be reviewed if the runoff destination is not feasible.

3. Extreme rainfall and flooding

- 3.1. No calculations are provided for the drainage system.
- 3.2. The drained area should be clarified and runoff calculated for the design storm based upon up to date rainfall data. Guidance is provided on ADC webpages - <https://www.arun.gov.uk/surfacewater>.
- 3.3. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. No assessment for water quality is provided with the application and water quality mitigation is not currently incorporated into the design.
- 4.2. The runoff should be assessed against the Simple Index Approach within the SuDS Manual or similar method. There is no trafficked areas shown on the layout and measures to mitigate runoff from roof areas and paths are likely to be able to be integrated at technical design stage.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.

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

- 7.1. A maintenance plan for the drainage system has not been submitted but the site is within a single ownership and management and this aspect can be addressed as part of the technical 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

From:
Sent:
To:
Subject:
Attachments:

Elaine Walby on behalf of Planning.Responses
13 April 2026 16:11
Planning Scanning
FW: Planning Consultation on: Y/10/26/PL
Y-10-26-PL - Rookery Farm 1.docx

PL- Consultation- Engineers response

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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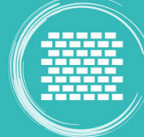
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Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 13 April 2026 11:29
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: Y/10/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential





From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 24 March 2026 14:03
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: Y/10/26/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:	Y/10/26/PL
Registered:	10th March 2026
Site Address:	Rookery Farm Flansham Lane Felpham PO22 6EP
Grid Reference:	496286 101289
Description of Works:	Partial demolition of agricultural building and erection of 1 No dwelling. This application is a Departure from the 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 11th April 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

Kathryn Welch

Planning Officer- Arun District Council

Telephone: 01903 737789

Email: kathryn.welch@arun.gov.uk