

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/24/26/PL	Reviewer Reference:	ADC/ETX4b
Planning Officer:	Amber Willard	Date of Review:	04/06/2026
Site Name:	Sunnymead North End Road Yapton BN18 0DL		
Application Description:	Retention of fence at west of site on North End Road, hardstanding and access track and the creation of a residential caravan site with 3 No plots with associated parking, landscaping and facilities (resubmission following Y/57/24/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 (Zero Rated) as other development.		
Assessment Number:	1 of 2		

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 in principle
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
2. Interception drainage	Compliant	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Compliant	No objection subject to conditions
6. Biodiversity	Insufficient	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:

- FLOOD STORAGE COMPENSATION PLAN ACC-25124-01
- PROPOSED SITE/BLOCK PLAN 10
- FLOOD STORAGE COMPENSATION
- SuDS AND DRAINAGE REPORT
- LIDSEY STATEMENT

Consultation comments to the planning officer

0. General

- 0.1. There is a significant area of surface water flood risk on this site, and no site-specific flood risk assessment has been submitted. The site (red line boundary) is currently 'undeveloped', and this application will introduce a more vulnerable use. Given the surface water flood risk on the site, and the use that is proposed, a site-specific flood risk assessment is required (in accordance with paragraph 181 and footnote 63 of the NPPF and the validation requirements of Arun District Council). In the absence of one, we **object in principle** to the application. Areas of flood risk also need to be considered as part of the drainage strategy for the site.

0.2. It is noted that some of the works described within the application are already constructed. This includes works to the access of the site which may have altered the levels and increased flood risk. Furthermore, one of the cabins is already in situ on the site, the drainage of which is uncertain. Further works may be required to elements which have already been constructed to ensure that flood risk is not increased.

1. Runoff destination

1.1. The designer has proposed a combination of rainwater reuse and infiltration techniques to dispose of rainwater, the latter supported by winter groundwater monitoring and infiltration testing demonstrating viability. The proposed methods are acceptable and in accordance with the hierarchy for sustainable drainage.

2. Interception drainage

2.1. Interception is delivered via rainwater harvesting and infiltration – ensuring that runoff from most frequent events does not leave the site. This complies with the relevant standard.

3. Extreme rainfall and flooding

3.1. ADC have published guidance relating to the use of SuDS in flood areas (<https://www.arun.gov.uk/suds-in-flood-areas>). This states that:

*“SuDS will only be considered in Flood Areas where the site is **entirely within those Areas**. On all other sites, all SuDS storage features must be located within Flood Zone 1 and **outside of any area of surface water flood risk**. It is expected that the layout of a proposed development is designed with this in mind.”* (My emphasis)

3.2. The proposed drainage strategy includes no reference to the surface water flood risk of the site and appears to position all storage features within areas of flood risk, despite parts of the site being at lower risk. By placing storage and infiltrating features in areas of flood risk there is an increased risk that features can be inundated by flood water prior to runoff entering them, rendering them ineffective and thus increasing flood risk.

3.3. Furthermore, the proposed flood storage compensation plan does not follow the level-for-level and volume-for-volume method. As a result, a hydraulic connection between the highway and the applicant land is altered and flood risk will be increased.

3.4. The inadequate consideration of flood risk on the site results in an **objection in principle** to the application in relation to this standard.

4. Water quality

4.1. The application includes a water treatment assessment which conforms to the simple index approach suggested by The SuDS Manual. The water treatment suggested is appropriate.

5. Amenity

5.1. Multifunctionality is offered with the rainwater harvesting tanks (collection and supply) and the permeable paving which operates as a parking surface and water treatment and storage. The surface water drainage does not improve placemaking, but it is acknowledged that opportunities for this are limited by the scale of the site and the flood risk on it. There is no objection to the application on the grounds of amenity.

6. Biodiversity

6.1. The drainage strategy does not include a BRO assessment and there does not appear to be any features include which provide biodiversity benefit. The designer cross references the bio-diversity net gain statement and indicates that biodiversity benefit will be delivered by other means on the site. The inclusion of SuDS features which provide biodiversity benefit may impact the scale and layout of the site and therefore we **object** to the application in relation to this standard.

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

7.1. There are no trees on the site which are likely to impact the proposed drainage strategy. The application includes a basic maintenance manual which may be improved via conditions applied to a planning permission. Further details regarding construction and structural integrity of the system may be agreed via conditions.

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.

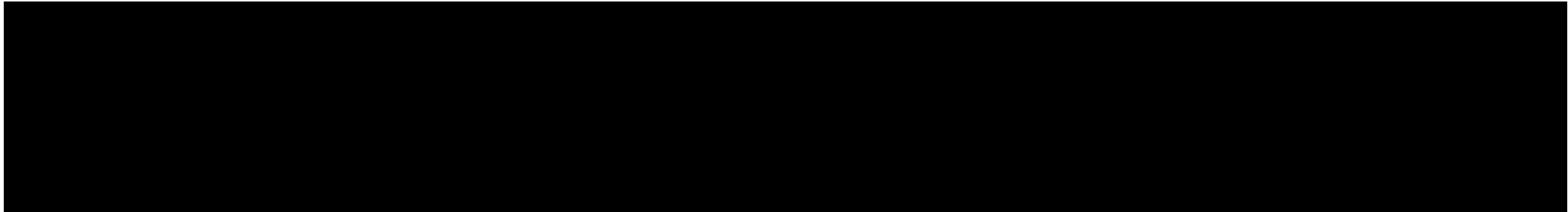
Drainage Impact on Other Planning Matters

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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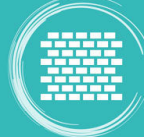
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 04 June 2026 16:37
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: Y/24/26/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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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 05 May 2026 09:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: Y/24/26/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/24/26/PL
Registered:	1st May 2026
Site Address:	Sunnymead North End Road Yapton BN18 0DL
Grid Reference:	498169 104354
Description of Works:	Retention of fence at west of site on North End Road, hardstanding and access track and the creation of a residential caravan site with 3 No plots with associated parking, landscaping and facilities (resubmission following Y/57/24/PL). This application is a Departure from the Development Plan and is in CIL Zone 3 (Zero Rated) as other development.

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 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

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk