

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/24/26/PL	Reviewer Reference:	ADC/ETX4b
Planning Officer:	Amber Willard	Date of Review:	18/08/2026
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:	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
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Compliant	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:

- Flood Risk Assessment C1002
- Response to drainage comment
- Drainage and SUDS Report Rev 1

Consultation comments to the planning officer

0. General

- 0.1. A flood risk assessment and updated drainage strategy have now been submitted. The comments in this consultation reflect the latest submission of documents. It is understood that the application has been withdrawn, but these comments may inform a future planning application on the same site.
- 0.2. As highlighted in our last consultation, 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. Evidence of the constructed levels, compared with proposed and previous levels will need to be submitted and checked. Further works may be required to elements which have already been constructed to ensure that flood risk is not increased. It is expected that formal

verification (and suggested remediation) of the drainage construction will be submitted and approved via a suitably worded condition.

- 0.3. Part of the proposal includes a pedestrian access to the north of the site. This will form an important element of the flood risk assessment. The flow routes through the site need to be assessed to ensure no negative impact and the planning layout and boundary treatments should reflect the inclusion of this access.

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, by adjusting ground levels and relocating soakaways, has positioned all of the chalets' drainage features outside of areas of flood risk. The parking area remains within the flood area, albeit at a raised level to reduce the frequency and depth of flooding. This is self-drained permeable paving. 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.
- 3.3. The design currently shows a hydraulic link between PP2 and PP1 – allowing areas outside of the Flood Area to drain into it. This would not be acceptable. However, if the permeable paving in the Flood Area is designed to only drain water falling on its own surface, then flood risk is assumed not to be increased by the proposal. This assumption is made on the basis that the raised surface levels of the parking will be accounted for by the flood compensation strategy (once updated). A detailed SuDS maintenance and management plan will have to be in place to ensure that the drainage system flood compensation area, and in particular the self-drained permeable paving, will be maintained for the lifetime of the development and can be remediated following flood events.
- 3.4. The designer has reasoned that the proposed flood storage compensation plan does not need to follow the level-for-level method as the flood risk area represents where surface water will pond at the end of a path. Therefore, a volumetric compensation approach has been used. This appears to be acceptable in principle if flow can be demonstrated to enter the area as it would prior to any development of the site (including over both accesses). It is suggested that the planning officer contact the Lead Local Flood Authority to check that they agree with the basis of assessment for compensation.

3.5. At present, the submission does not demonstrate compliance with volumetric compensation adequately. The description and tables (on drawings EX FL-01 and FL-01) justifying the approach used are not clear enough. If a new application is made, then it will be expected that the tables and workings are clearly explained. At present there is no explanation for these tables, and the volumes do not appear to align with the plan areas quoted.

3.6. The current inadequate consideration of flood risk on the site at present would result in an **objection** to the application in relation to this standard. It is expected that these comments will assist in overcoming that objection prior to another planning application being made.

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. However, the designer now includes raised planters to offer biodiversity benefit, on this basis we would be unlikely to object without the support of the ecology officer. The designer cross references the bio-diversity net gain statement and indicates that biodiversity benefit will also be delivered by other means on the site.

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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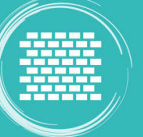
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Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 20 August 2026 09:54
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

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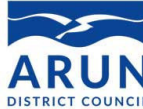
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Supporting our environment to support us



Fulfilling Arun's economic potential



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 26 June 2026 15:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: Y/24/26/PL

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	Y/24/26/PL
Registered:	1st May 2026
Site Address:	Sunnymead North End Road Yapton BN18 0DL
Grid Reference:	498169 104354
Category:	Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 22nd June 2026 relating to:- FRA and Plans

If you should wish to make further representations as a result of this amendment, please make any further comment by **11th July 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Amber Willard

Planning Case Officer- Arun District Council

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Email: amber.willard@arun.gov.uk

PLRECON (ODB) 2018