

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/31/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	05/08/2026
Site Name:	2 Downview Road Yapton BN18 0HS		
Application Description:	Erection of terrace of 3 No. town houses with gardens and parking spaces (resubmission following Y/5/26/PL). This application is in CIL Zone 2 and is CIL Liable as new dwellings.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	Further Information
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection subject to conditions
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Further Information

Reviewed Plans

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

No new drainage information has been submitted since our previous consultation and therefore our previous comments still apply.

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

N/A

Consultation comments to the planning officer

0. General

- 0.1. The application for three residential dwellings is supported by a Flood Risk Assessment and a Drainage Statement together with ground investigation and drainage design and calculations.
- 0.2. There is surface water flood risk at the site which should not affect the proposed buildings but may potentially affect the drainage system or be displaced by the works.
- 0.3. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.4. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.5. There are existing trees which require a 'no-dig' pavement solution and the new driveway may affect tree health, the Tree Officer should therefore be consulted.

1. Runoff destination

- 1.1. Water Butts are noted in the report and can be incorporated into the technical design.
- 1.2. The drainage strategy is to drain the roof areas to a permeable pavement which is utilised as an infiltration blanket.
- 1.3. The ground investigation is based upon the Arun DC 'small sites exception' for a proposed roof area of less than 250sqm, which is in accordance with Arun DC guidance. The groundwater monitoring and infiltration testing indicates that discharge to ground via the permeable pavement is feasible.
- 1.4. It is not clear whether the new development would affect the drainage system for the existing property and this should be clarified.

2. Interception drainage

- 2.1. Interception drainage is achieved by discharge to ground for the whole drained area.

3. Extreme rainfall and flooding

- 3.1. Further assessment of the current national surface water flood risk modelling which includes the 2070s epoch. The FRA should demonstrate the existing surface water flood risk would not be displaced offsite by development and would not inundate the drainage system.
- 3.2. Calculations are provided for the design storm and show no flooding. However, the following updates to the calculations should be made.
- 3.3. A drained areas plan and urban creep summary should be provided.
- 3.4. The soakaway factor of safety should be reviewed and increased in line with NSfS Table S3.1.
- 3.5. The no dig construction should be included in the calculations.
- 3.6. Microdrainage software cannot include FEH22 which is the latest rainfall data. The latest rainfall data should be used or a comparison provided to demonstrate robust assessment.
- 3.7. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. The water pollution indices risk is low and water quality mitigation is provided by permeable pavement and filter drains / filter chambers, which meet the standards set out in the Simple Index Approach.
- 4.2. Water quality is acceptable subject to technical design.

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. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. Amenity is not currently in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.

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. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.3. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

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

- 7.1. It may be difficult to construct the new block paving driveway to the necessary levels and depths to incorporate large return period storms and avoid a reduced dig which would damage the trees. This area may need to drain or have an overflow facility to the proposed permeable pavement soakaway.
- 7.2. No management and maintenance plan is submitted and there are aspects of shared infrastructure, including with the existing property, which may require a management company. The intended approach should be clarified in the submission and a detailed maintenance plan can be provided with discharge of conditions stage.

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: Elaine Walby on behalf of Planning.Responses
Sent: 06 August 2026 15:50
To: Planning Scanning
Subject: FW: Planning Consultation on: Y/31/26/PL
Attachments: Y-31-26-PL - 2 Downview Road-1.docx

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

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

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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 Our core foundations	 
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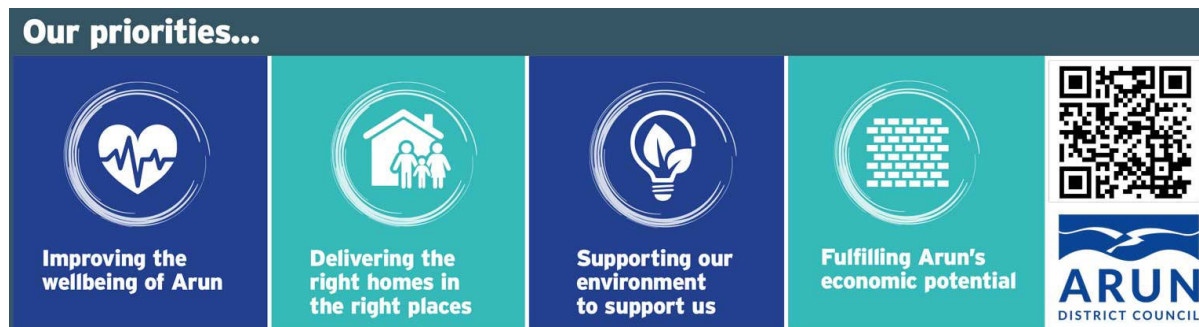
From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 05 August 2026 11:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Nicola Spencer <Nicola.Spencer@arun.gov.uk>
Subject: RE: Planning Consultation on: Y/31/26/PL

Please find enclosed our consultation response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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



From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 22 July 2026 14:49

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: Y/31/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: Y/31/26/PL

Registered: 7th July 2026

Site Address: 2 Downview Road Yapton BN18 0HS

Grid Reference: 498250 103074

Category: Plan Applicat'n

Description of Works: Erection of terrace of 3 No. town houses with gardens and parking spaces (resubmission following Y/5/26/PL). This application is in CIL Zone 2 and is CIL Liable as new dwellings.

I am able to inform you that I have received an amendment to the above application dated 7th July 2026 relating to:- amended Certificate

If you should wish to make further representations as a result of this amendment, please make any further comment by **20th August 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

Nicola Spencer

Planning Case Officer- Arun District Council

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Email: nicola.spencer@arun.gov.uk

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