

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/36/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	07/09/2026
Site Name:	Land adjacent to Pippin Cottage North End Road Yapton BN18 0DS		
Application Description:	Development of 4 new semi-detached 2 bed dwelling houses. This application is a Departure from the Development Plan. This application is CIL liable Zone 3 (new dwellings).		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to condition

Reviewed Plans

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

- Flood Risk Assessment and Foul Surface Water Drainage Strategy and Lidsey Drainage Impact Assessment. July 2026
- In Situ Infiltration Test Report. Ref R17122
- Drainage document list
- Flood Risk Assessment, Surface and Foul Water Drainage Strategy and Lidsey Drainage Impact Assessment for Planning August 2026**

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 proposals will affect drainage on and around the site, therefore the development will require sustainable drainage proportionate to the nature and scale of development in accordance with NPPF Section F8.
- 0.2. The site is not at significant risk of flooding from external sources as shown by the submitted flood risk assessment and our datasets.
- 0.3. We have reviewed the revised drainage statement dated August 2026 ref 95823-RecOrtArch-PippinCttdg.

1. Runoff destination

- 1.1. Water butts are shown and are suitable for small scale residential garden irrigation.
- 1.2. The site investigation shows peak groundwater levels at 2.2m below ground level in the location of the permeable pavement and worst case infiltration testing results provide viable infiltration at the depth of the proposed permeable pavement. The proposed discharge to ground is therefore acceptable.

2. Interception drainage

- 2.1. Interception drainage is provided through discharge to ground.

3. Extreme rainfall and flooding

- 3.1. The drainage assessment and modelling parameters are generally in accordance with standards and guidance.
- 3.2. However, the area of the permeable pavement available for storage is not consistent with the root protection zones, which will require shallow construction and not be available for attenuation. The area utilised for storage and infiltration should be smaller than the drained area of permeable pavement. Currently the drained area of the driveway and the permeable pavement storage are the same. This indicates that the root protection constraint has not been addressed. Clarification of the drained area and restricted plan area of the permeable paving storage should be provided.
- 3.3. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3). The current submission does not demonstrate compliance with the standard, therefore, we Object to the development.

4. Water quality

- 4.1. The permeable paving is sufficient water quality mitigation for the pollution hazard from the development.

5. Amenity

- 5.1. Amenity has not been assessed and presented in the drainage report. However, the opportunities on a site such as this are limited and the amenity value should be proportionate to the nature and scale of development.
- 5.2. The proposals incorporate permeable paving and small areas of greenroof which provide a minimal provision proportionate to the scale of development and site constraints.

6. Biodiversity

- 6.1. Biodiversity delivered through the drainage strategy has not been assessed and presented in the drainage report. However, the opportunities on a site such as this are limited and the biodiversity value should be proportionate to the nature and scale of development.
- 6.2. The proposed grasscrete permeable paving and small scale greenroof areas included in the scheme provide a limited contribution to biodiversity proportionate to the scale of development and site constraints.

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

- 7.1. The maintenance of the shared drainage system is proposed to be shared between the properties. This would require a formal arrangement to be effective.
- 7.2. A Management and Maintenance Plan can be the subject of a planning condition.

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

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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 September 2026 12:59
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/36/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 28 August 2026 11:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: Y/36/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: **Y/36/26/PL**
Registered: 8th July 2026
Site Address: Land adjacent to Pippin Cottage North End Road Yapton BN18 0DS

Grid Reference: 497998 103963
Category: Plan Applicat'n
Description of Works: Development of 4 new semi-detached 2 bed dwelling houses. This application is a Departure from the Development Plan. This application is CIL liable Zone 3 (new dwellings).

I am able to inform you that I have received an amendment to the above application dated 24th August 2026 relating to:- Substitute FRA

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

Kathryn Welch

Planning Case Officer- Arun District Council

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