

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/48/25/PL	Reviewer Reference:	ADC/KW and SB
Planning Officer:	Harry Chalk	Date of Review:	11/11/2025
Site Name:	Church Farm House Church Road Yapton BN18 0EP		
Application Description:	Removal of tennis court and construction of 1 No. self-build single storey energy efficient dwelling. This application is a Departure from the Development Plan, may affect the setting of listed buildings, affects the character and appearance of the Church Lane, Yapton Conservation Area and is in CIL Zone 3 and is CIL Liable as a new dwelling.		
Assessment Number:	2 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
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Compliant	Support
6. Biodiversity	Insufficient	No objection subject to conditions
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:

- Tree Protection Plan dated 12/08/2025.
- Location Plan P001 Rev A
- Foul and Surface Water Drainage Report, reference C3267, revision P1, dated 21 November 2025. Referred to as the **FSWDR**.
- Proposed Drainage Strategy Sheet 1: C3267-P-101 Rev P1
- Proposed Drainage Strategy Sheet 2: C3267-P-102 Rev P1
- Contributing Area Plan & Exceedance Flow Routes: C3267-P-201 Rev P1
- Topographic Survey: 240206
- Ecological Appraisal Report
- Consultants' comments dated 21/11/2025
- Groundwater Monitoring data
- Soakaway Testing Report 4/11/2025
- E3s Consulting Response/ dated 19/11/2025
- Storm Calculations dated 19/11/2025

- Letter dated 19/11/2025 from Barry Holdsworth Ltd
- SuDS Maintenance and Management Plan P1 21/11/2025

Consultation comments to the planning officer

0. General

- 0.1. Insufficient information regarding surface water drainage has been submitted to evidence that flood risk will not be increased as due to the proposed development.

1. Runoff destination

- 1.1. The proposed SuDS design includes a rainwater harvesting tank for water reuse and allows for all remaining surface water to be drained to ground via infiltration. This accords with the sustainable drainage hierarchy and we support the design in principle. However, there remains some uncertainty regarding the viability of infiltration and the space that is needed to drain the site as proposed.
- 1.2. Winter site specific groundwater monitoring has been submitted which demonstrates that there may be potential for shallow infiltration on the site. The peak groundwater level was evidenced to be at 1.65m below ground level (bgl) on 22 November 2024. Groundwater was monitored from 25 October 2024 to 11 March 2025. This period is likely to capture the peak groundwater level, although the observations were fortnightly which may have meant a peak could be missed between observations. Due to the scale of the development the groundwater monitoring completed to date is not challenged and no further monitoring is required.
- 1.3. Borehole logs indicate that made ground is present on site to a depth of 0.8 m bgl. It is proposed that infiltration will occur within this layer at approximately 0.6 m bgl. A letter of support has been provided by E3S Consulting, confirming that the site comprises topsoil to 0.4 m bgl, underlain by a dark brown clay layer containing cobble-sized brick fragments.
- 1.4. Although guidance generally advises against infiltration into made ground due to the potential for unpredictable settlement, E3S has advised that, given the limited size and shallow-sided design of the basin, the presence of made ground is unlikely to materially affect the stability of the SuDS feature. The made ground is not considered to exhibit poorer infiltration rates than natural ground.
- 1.5. E3S also recommends that a watching brief be undertaken during construction to visually confirm the ground conditions are as described in the letter of support. This is acceptable.
- 1.6. No further infiltration testing has been undertaken. Instead, the updated plans indicate that additional winter testing is required. The Consultants have confirmed that, should a slower infiltration rate be calculated, there is space within the bioretention planters and the rainwater harvesting tank to provide additional storage allowance.
- 1.7. Although there is a level of comfort regarding infiltration, the infiltration rate remains unknown. Despite the ability to provide additional storage within the bioretention planter, it cannot be guaranteed that this will be sufficient, nor can it be guaranteed that the rainwater harvesting tank will

have capacity at the times required (as the heaviest rainfall is likely to occur when the demand for non-potable water is at its lowest). Given this level of uncertainty, and the limited availability of space on site to accommodate the SuDS basin, it would not be appropriate to fix the scale and layout of the development at this stage.

- 1.8. The proposal remains unacceptable and, as a result, **the objection to the proposal has not been lifted.**

2. Interception drainage

- 2.1. No formal interception assessment has been submitted. However, the design uses both a rainwater harvesting tank and full infiltration to ground. These methods deliver interception drainage, and it may be assumed that interception will be achieved if no changes are made to the design in response to our comments regarding standards 1 and 3. As such we have no objection to the application on this ground.

3. Extreme rainfall and flooding

- 3.1. The FSWDR includes drainage plans and modelling. The simulation for the 1% AEP + 45% event has a maximum water level in the basin of 7.439mAOD. The bank at the northeast extent of the infiltration basin has now been increased in height to 7.500 AOD. As a result of the finished floor level of the dwelling being raised to 7.750 AOD, the cover level and rodding eye have also been increased to 7.600 AOD which is acceptable and an appropriate freeboard is now confirmed. Subject to confirmation of an infiltration rate/storage requirements it is now confirmed that the system would not flood during such an event.
- 3.2. It is considered that the proposed design will not negatively impact on the surrounding water environment, and it **is appropriate to lift our objection to Standard 3** subject to securing a detailed design by condition.

4. Water quality

- 4.1. The submission includes a water quality assessment which demonstrates that the water quality standard will be met if no changes are made to the design in response to our comments regarding standards 1 and 3. As such we have **no objection to the application** on this ground.

5. Amenity

- 5.1. The design provides amenity benefit with a multifunctional open feature which provides visual amenity and landscape character. The proposed water depths are safe and details to ensure climate resilient and adaptable planting can be secured via condition. As such we **support** the proposal with regards to this standard.

6. Biodiversity

- 6.1. An assessment of the biodiversity benefits delivered by the shallow SuDS basin has been provided and is acceptable. It is acknowledged that such a feature will have a positive impact on biodiversity net gain (BNG). As such we have **no objection subject to a condition** which will secure the details of any biodiversity benefit delivered by the SuDS.

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

- 7.1. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS has been submitted. However, most elements of

this standard can normally be secured via condition. The submission of a Management and Maintenance Plan is unlikely to affect the scale or layout of the development. The designer is directed <https://www.arun.gov.uk/designer-checklists> for full details of the requirements of a Maintenance and Management Plan.

- 7.2. There are a significant number of good quality trees on the site, most of which are to be retained. These existing trees are a constraint to the drainage strategy as any drainage installations should not damage the trees, and the drainage infrastructure itself needs to be protected from tree root damage. The design as submitted avoids conflict with the existing trees and their current root protection areas. Plans confirm that any works within the root protection areas will be undertaken by hand, also, an arboriculturist has confirmed that having regards to the trees on site, the proposed plans are acceptable. However, the design may need to be altered to account for the comments relating to standards 1.
- 7.3. Due to the lack of conflict in the submitted design there is **no objection subject to condition** with regards to this standard. However, the standard must be reassessed with any newly submitted design to ensure that it is met with any later revisions.

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 ...**ECOLOGY**.....
- ☐ None

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 24 December 2025 09:55
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: Y/48/25/PL re-consultation response

Please find attached the second response from the engineers; an objection.

Kind regards,

Kathryn Welch
Senior Planning Officer, Planning Department

Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

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