

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/57/25/PL	Reviewer Reference:	ADC/PC
Planning Officer:	Simon Davis	Date of Review:	27/10/2025
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 the creation of a residential caravan site with 3 No plots with associated parking, landscaping and facilities. This application is a Departure from the Development Plan and is in CIL Zone 3 (Zero Rated) as other development.		
Assessment Number:	1 of 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

Flood Storage Compensation Statement & Plan (ACC-25174-01)

Consultation comments to the planning officer

0. General

0.1. No information regarding surface water drainage has been submitted to evidence that a sustainable drainage system is achievable, or flood risk will not be increased due to the surface water drainage of the proposed development. I therefore object in principle to the application.

0.2. Part of the site is within a very low lying area (proposed parking area, etc) and is known to flood, as result of overland/pluvial flows, and 'reported' high groundwater levels. The applicant is proposing to infill some of this area and compensate elsewhere on the site. It should be noted that no supporting groundwater level data has been provided and this may impact the proposed compensation storage. We have not assessed the proposal as it is not within our jurisdiction, as we would only assess the SuDS design. West Sussex County Council, as Lead Local Flood Authority, have responsibilities for managing flood risk, which

include risk from surface water (pluvial) and groundwater, and this proposal would fall within that remit. However, due to this being a minor application, it is unlikely that they have been consulted. Nevertheless, it is strongly recommended that they are consulted to ensure that the compensation proposal is technically reviewed and proven to be viable.

0.3. It should be noted that achieving an acceptable/sustainable drainage system within the low lying area of the site could also be challenging.

1. Runoff destination

1.1. No information supplied. The planning officer should note that options to drain surface water from this site are extremely limited as there are no watercourses or surface water sewers in the vicinity of it. If infiltration is not viable then it is unclear how this site will be sustainably drained.

2. Interception drainage

2.1. No information supplied.

3. Extreme rainfall and flooding

3.1. No information supplied.

4. Water quality

4.1. No information supplied.

5. Amenity

5.1. No information supplied.

6. Biodiversity

6.1. No information supplied.

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

7.1. No information supplied.

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.

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

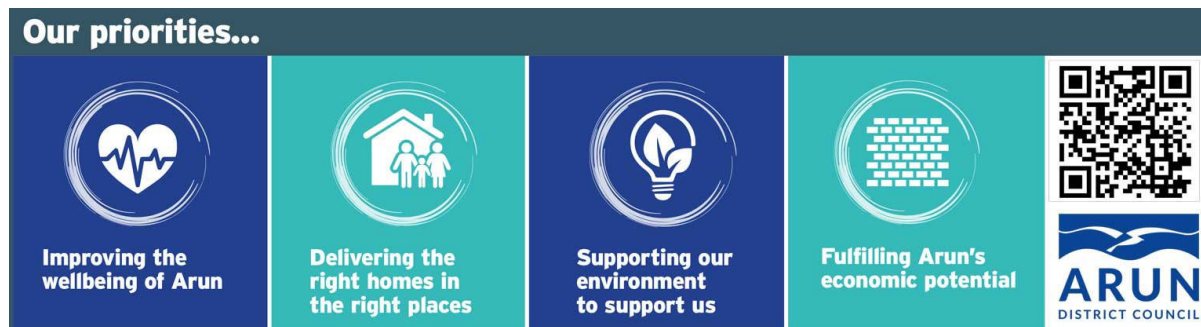
[REDACTED]

Drainage Engineers response

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 27 October 2025 13:09

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

Cc: Simon Davis <Simon.Davis@arun.gov.uk>; Sarah Burrow <Sarah.Burrow@arun.gov.uk>

Subject: RE: Planning Consultation on: Y/57/25/PL

Please find enclosed my consultation, an objection.

Regards

Paul Cann

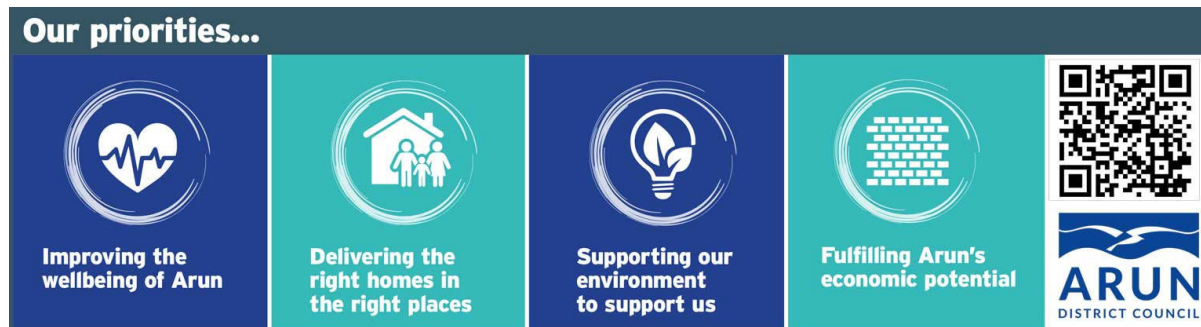
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: Friday, August 29, 2025 9:18:38 AM (UTC+00:00) Monrovia, Reykjavik

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

Subject: Planning Consultation on: Y/57/25/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/57/25/PL

Registered: 28th August 2025

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 the creation of a residential caravan site with 3 No plots with associated parking, landscaping and facilities. 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 2nd October 2025 . 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