

Engineers Comments Regarding Surface Water Drainage

Application Reference:	Y/58/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Rhiannon Lloyd	Date of Review:	25/9/2026
Site Name:	88 Bilsham Road, Yapton		
Application Description:	Removal of existing conservatory and erection of single storey extension.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection subject to conditions
5. Amenity	Insufficient	No objection subject to conditions
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:

Flood Risk Assessment

Lidsey Foul Water Catchment Area Statement

Consultation comments to the planning officer

0. General

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. It is proposed to infiltrate surface water to soakaways. Whilst this is positively viewed, and accords with Standard 1 of the NSfS, insufficient evidence has been provided at this time to prove viability. As insufficient evidence has been submitted to demonstrate how the applicant intends to drain surface water, we are unable to assess whether the proposed development would increase flood risk. It is the responsibility

of the applicant or their drainage designer to provide this evidence. For this reason, we object to the proposal, as the submission of such evidence may affect the scale and layout of the development.

1.2. To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of one metre of unsaturated ground can be maintained between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential in Yapton are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.

1.3. If infiltration is not viable, then alternative sustainable means of draining the site are summarised as follows:

- Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
- Infiltration – not investigated.
- To a watercourse – A pond can be found 90m to the north and an ordinary watercourse is located approximately 230m to the east. A Main River (Ryebank Rife) flows approximately 230m to the south and crosses Bilsham Road.
- To a surface water sewer – None available.
- To a highway drainage system – Located in Bilsham Road.
- To a combined sewer – None available.

1.4. It is essential that each discharge destination is considered in strict priority order, with higher priority options fully explored and demonstrably exhausted before progressing to lower priority alternatives. Robust evidence must be provided to discount a higher priority destination.

1.5. The existing pond is located to the north of the site, south-west of 'Little Meadow'. How the pond operates in terms of having a positive outfall/discharge is not known. An ordinary watercourse is also present to the east of the site. The Lead Local Flood Authority (LLFA), is the relevant Risk Management Authority for both potential discharge locations.

1.6. It must be demonstrated that a gravity-fed discharge can be achieved should the options in item 1.5 be pursued and that they are fit for purpose/have positive outfalls to a wider system. No evidence has been submitted to confirm this. In either scenario, a pumped drainage solution would be strongly discouraged and is unlikely to be supported.

1.7. The proposed discharge rates, volumes and flow control arrangements would need to be agreed. This is an expectation of the Non-Statutory Technical Standards for Sustainable Drainage Systems (NSfS).

1.8. Any works or connection to the Main River would require the consent of the Environment Agency.

1.9. In addition, any works affecting the watercourse may require the prior consent of the LLFA. Separate consent under Arun District Council's Land Drainage Byelaws may also be necessary. The applicant is therefore advised to contact Arun District Council at land.drainage@arun.gov.uk to establish the relevant consenting requirements at an early stage. Any relevant permissions from third party landowners would also need to be evidenced.

1.10. Despite indicating to the contrary, the site is not located in either the Lidsey Treatment Catchment Area or a Lidsey Flood Risk Zone.

2. Interception drainage

Subject to infiltration being found viable, the applicant has not proposed any interception features. In recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.

- infiltration features designed to meet extreme rainfall standards.
- water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
- raingardens and bioretention features attached to all new downpipes.
- permeable surfacing.

These features will not affect the scale or layout of development and as such can be secured by condition.

3. Extreme rainfall and flooding

A Flood Risk Assessment has been submitted however an incorrect site has been identified on the plan. The site is currently located within a future Flood Zone. Product 4 data (available from the Environment Agency) is required to identify the source of the flood risk. SuDS features should not be located in fluvial flood zones. (Please see our guidance relating to this at www.arun.gov.uk/surfacewater). Without an accurate understanding of the flood risk on the site, we cannot assess if the proposed drainage strategy is compliant. Therefore, we object to the application.

The site is at risk of surface water flooding in the 0.1% AEP (1 in a 1000 year) event, including where the proposed extension is intended to be sited. This will need to be considered in any SuDS design.

At present insufficient detail has been included on the drainage plans submitted for engineering assessment. In the absence of this evidence, and without accurate understanding of the existing site drainage, etc, we cannot assess if flood risk will be increased by the proposed development. Therefore, this application does not accord with the NPPF as set out above.

4. Water quality

Insufficient evidence of water quality benefits has been provided, and as such, Standard 4 of the NSfS has not been met. However, the submission of this evidence is unlikely to affect the scale or layout of the development. Therefore, we do not object to the proposal on these grounds, subject to a condition securing the provision of details demonstrating water quality benefits.

5. Amenity

Insufficient amenity benefits arising from the proposed SuDS have been identified, and therefore Standard 5 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

Insufficient biodiversity benefits arising from the proposed SuDS have been identified, and therefore Standard 6 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to

affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of biodiversity benefits.

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

Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. However, in the absence of significant existing trees which could impact the scale and layout and location of SuDS features, 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. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing the detailed surface water drainage design.

8. Suggested conditions / Overcoming the objection

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.

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.

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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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 05 October 2026 16:52
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>
Subject: Y/58/26/HH 88 Bilsham Road

Please find attached the engineers comments.

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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Our priorities...



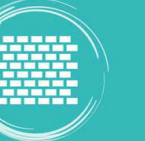
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential

