

Engineers Comments Regarding Surface Water Drainage

Application Reference:	AL/47/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Silvie Steiningerova	Date of Review:	08/07/2026
Site Name:	Tara, Norton Lane, PO20 3NH		
Application Description:	Proposed two-storey side extension, two-storey rear extension, single storey rear extension, front porch, new roof.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection

Reviewed Plans

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

- **Proposed Drainage Scheme**
- **PL101 - Surface Water Drainage**
- **Lidsey Drainage Impact Assessment**

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 Discharge to the ground is proposed via soakaways located in the front and rear gardens, and we support this approach in principle, as infiltration is the highest priority in the drainage hierarchy after water reuse and aligns with Standard 1 of the National Standards for SuDS (NSfS).

- 1.2 Groundwater monitoring has been provided, and the monitoring point and its depth are noted on the plan and within the drainage statement. Levels recorded during the winter period, at roughly two-weekly intervals, indicate that groundwater peaked at 1.36m below ground level (bgl). This suggests that only shallow infiltration on site is possible, as the required 1m of unsaturated ground would need to be maintained.
- 1.3 Details provided indicate that the proposed soakaways will have an invert level of 900mm below ground level. This would encroach into the required 1m of unsaturated ground by 540mm and therefore does not accord with the NSfS.
- 1.4 No infiltration testing has been undertaken. This is a requirement to ensure that sufficient rainwater storage is available on site to accommodate extreme rainfall events without flooding the site or surrounding areas.
- 1.5 Full details of the requirements for undertaking infiltration testing can be found here:
<https://www.arun.gov.uk/infiltration-testing>
- 1.6 For the reasons given above, infiltration to ground has not been suitably evidenced as viable, nor does the proposed scheme accord with the NSfS. As such, we object to the proposal.
- 1.7 Standard 1 of the NSfS outlines the following hierarchy of sustainable means of draining a site, comments are provided regarding the viability of these options on this site:
 1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
 2. Infiltration –proposed but not fully investigated.
 2. To a watercourse – there is an ordinary watercourse to the west of Norton Lane within the highway verge, not investigated.
 3. To a surface water sewer – none available.
 4. To a highway drainage system – to the immediate west of site, not investigated.
 5. To a combined sewer – none available.
- 1.8 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.
- 1.9 The Lead Local Flood Authority (LLFA - WSCC) is the risk management authority for the ordinary watercourse. No evidence has been submitted to demonstrate that they have consented to the proposed works through the Ordinary Watercourse Consent process. Furthermore, the proposed discharge rates, volumes or flow parameters will also need to be agreed by this Authority to support the Ordinary Watercourse Consent. This is an expectation of the NSfS. Consent may also be required from the LLFA for any proposed works to the watercourse.
- 1.10 In additional Arun District Council consent relating to the Land Drainage Bylaws may also be required. Please contact ADC at land.drainage@arun.gov.uk. If permission from the relevant authority is not obtained for the principle of discharging to the watercourse, then it is unclear how the applicant may drain surface water from the site.

- 1.11 There are public highway drains in Norton Road. These are controlled by West Sussex County Council and permission to connect would be required from them (but permission often resisted).
- 1.12 The application site is in the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a surface water management plan due in part to the recognised history of foul sewer flooding. It is important to ensure that future development does not exacerbate this problem.

2. Interception drainage

The drainage statement has not proposed any interception features. Should infiltration be demonstrated to be unviable, then additional interception feature will be required. 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

The entire site is part of a Groundwater Source Protection Zone. It is acknowledged that the proposed structure will not be located in this area, however this should be considered by the surface water drainage design. If infiltrating features are located in this area, then the Environment Agency and Portsmouth Water should be consulted. It is expected that if infiltration is shallow then they are unlikely to object.

The western and northern boundaries of site are at risk of surface water flooding in the 3.3% AEP in the present day. This may need to be accounted for in the proposed drainage design.

The applicant has submitted a drainage statement which states that the soakaway crates have been designed to accommodate the 1 in a 100-year event plus climate change, however, the full calculations have not been submitted for assessment. In the absence of this evidence, we cannot assess if flood risk will be increased by the surface water drainage of the proposed development. Therefore, this application does not accord with the NPPF as set out above and we **object** for this reason.

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. There are a number of large trees within the rear garden and it should be ensured that drainage features which may pass through root protection areas should be robustly protected from damage from tree roots. As the scale and layout of drainage features may be influenced by existing trees, it would not be appropriate to rely on conditions to secure details of the maintenance and management of the system. For this reason, **we object** to the proposal on this ground.

8. 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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