

Engineers Comments Regarding Surface Water Drainage

Application Reference:	CM/16/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Rhiannon Lloyd	Date of Review:	17/08/2026
Site Name:	3 New Thatched Cottages, Climping Street		
Application Description:	Construction of detached garage/workshop with studio over.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
2. Interception drainage	Insufficient	No objection
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:

SW Drainage Layout 2139/D3

Micro Drainage Calculations

Flood Risk Assessment (FRA)

Percolation Tests

Groundwater Monitoring.

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.

Southern Water should be consulted due to the proximity of the public foul rising main.

1. Runoff destination

It is proposed to manage surface water on site via a new soakaway. We support this approach in principle, as infiltration is the highest priority discharge location (after water re-use) in the drainage hierarchy and aligns with Standard 1 of the Non-Statutory Technical Standards for SuDS (NSfS).

Water re-use will need to be demonstrated in a detailed design, but this will not affect the scale and layout of development and can be secured via condition.

Groundwater monitoring undertaken during October 2025 – January 2026 at roughly weekly intervals which is acceptable. It demonstrates that groundwater peaks at 1.86m (bgl) below ground level.

Infiltration testing at a depth of 880mm (allowing for 1m of unsaturated ground in any scheme) has been undertaken and submitted. The slowest infiltration rate recorded was **2.659x10⁻⁵m/s**.

Infiltration has been proven viable and the proposed system, to drain and infiltrate to is acceptable.

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.

2. Interception drainage

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 infiltration features designed to meet extreme rainfall standards, are satisfactory to demonstrate interception.

3. Extreme rainfall and flooding

Sustainable Drainage Systems (SuDS) should ideally be located entirely within areas of Flood Zone 1 (FZ1) to avoid any interaction with areas identified as being at future risk of flooding. Product 4 data has been provided, indicating that approximately half of the site (to the west) will be at future risk of flooding from tidal sources during the 0.5% AEP event. The peak flood level is predicted to be 4.94 mAOD, which would result in flood depths across the site of between 2 cm and 9 cm. As the source and level of flooding has been evidenced, the proposed SuDS design is considered acceptable in this instance.

The proposed finished floor level shown on the plans is 5.15 mAOD. This is only slightly above the predicted flood level. **The Environment Agency should be consulted in this respect.**

Storm calculations provided have not modelled the 1 in 2-year (50% AEP) event.

A contributing area plan should be provided showing all positively drained areas including open surface water storage plan areas. Urban creep at a rate of 10% is required to be applied to residential roof areas is required.

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

No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.

However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

6. Biodiversity

No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.

However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.

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. 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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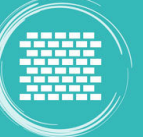
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 19 August 2026 10:38
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>
Subject: CM/16/26/HH

Please find the engineers response attached; an objection.

Many thanks,

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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