

## Engineers Comments Regarding Surface Water Drainage

|                          |                                              |                     |            |
|--------------------------|----------------------------------------------|---------------------|------------|
| Application Reference:   | <b>FP/65/26/HH</b>                           | Reviewer Reference: | ADC/KW/PC  |
| Planning Officer:        | Hebe Smith                                   | Date of Review:     | 01/07/2026 |
| Site Name:               | 6 The Loop Felpham PO22 7ND                  |                     |            |
| Application Description: | Detached double garage, new gates and piers. |                     |            |
| 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 |
|----------|-----------|
|----------|-----------|

### 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 | <b>Objection</b>                          |
| 2. Interception drainage                                                          | Insufficient | <b>No objection subject to conditions</b> |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient | <b>Objection</b>                          |
| 4. Water Quality                                                                  | Insufficient | <b>No objection subject to conditions</b> |
| 5. Amenity                                                                        | Insufficient | <b>No objection subject to conditions</b> |
| 6. Biodiversity                                                                   | Insufficient | <b>No objection subject to conditions</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient | <b>No objection subject to conditions</b> |

## Reviewed Plans

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

- **Lidsey Surface Water Management Plan Flood Risk Assessment**
- **Flood Risk Assessment**
- **SW Drainage Layout 2161/D2**
- **Construction Details 2161/D1**
- **Groundwater Monitoring**
- **Storm Calculations**

## Consultation comments to the planning officer

### 0. General

- 0.1. The Lidsey Drainage Statement and Flood Risk Assessment conflict with plans and diagrams provided, indicating that a soakaway is proposed. Please remove any reference to a soakaway and reference only the proposed discharge to an above ground system.

0.2.

## 1. Runoff destination

- 1.1. Groundwater monitoring has been submitted, which indicates that during the winter months groundwater peaks at 1.15m below ground level. Based on this evidence, it is clear that it will not be possible to achieve 1m of unsaturated ground beneath any infiltration features; therefore, infiltration is considered unviable.
- 1.2. Instead, it is understood that it is proposed to drain surface water via an attenuation crate to an existing pond which forms part of the surface water/land drainage system. In principle, this is acceptable and accords with the drainage hierarchy and Standard 1 of the NSfS, although water re-use will also need to be implemented.
- 1.3. It is noted that Plan 2161/D2 denotes this pond (or at least part of it) as ornamental. The applicant is reminded that the pond is an important feature of the existing surface water/land drainage drainage system in the immediate area, receiving flows from the north.. Any implication that the pond is not an important component of the area's surface water drainage system should be removed from the plans.
- 1.4. In order to 'make best use of soakage and accord with good SuDS principles', the attenuation tank has been designed as an unsealed system to allow for some degree of infiltration into the ground. However, infiltration has been demonstrated to be unviable in terms of the NSfS, as it fails to achieve the one metre freeboard. This feature should be revised to a fully sealed system.
- 1.5. To ensure that discharge to the existing pond is feasible, the condition and capacity of the pond will need to be demonstrated. For example, photographic evidence of existing silt levels and a cross-section of the pond's inlet and outlet pipes should be provided, including all relevant levels.
- 1.6. A CCTV survey of the existing piped outlet, up to the point where it connects to the public surface water sewer in Jacken Close, will also be required to demonstrate that the system is fit for purpose.
- 1.7. Details of the pipe diameter and gradient for the section of pipe between the attenuation tank and the headwall are also required and should be shown on the plan to ensure self-cleaning velocities are achieved.
- 1.8. A contributing area plan is to be provided showing all positively drained areas.
- 1.9. The proposed discharge location is acceptable in principle; however, further details are required to demonstrate that both the receiving drainage system is fit for purpose. As this has not been fully demonstrated, and the applicant has not submitted a compliant alternative surface water disposal destination, we currently **object to the proposal**. The submission of additional evidence may affect the scale and layout of the development.

## 2. Interception drainage

- 2.1. Water butts are proposed, please demonstrate these on plan. 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.

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

### 3. Extreme rainfall and flooding

3.1. The site lies partly within Flood Zone (FZ) 3a, partly within FZ2 and partly within FZ1. When climate change allowances are applied, the whole site is expected to fall within FZ3a in the future. To confirm this mapping, Product 4 data should be requested from the Environment Agency. It is assumed that this flood risk arises from tidal sources; however, the Product 4 data will confirm this.

3.2. The site is currently at risk of surface water flooding, with ponding largely confined to the existing pond area, which itself is at a 3.3% AEP risk. The land immediately surrounding the pond is within the 0.1% AEP risk area. Under future climate change scenarios, a significant proportion of the site falls within the 0.1% AEP risk area. This should be taken into account within the design.

3.3. Storm calculations have been provided to demonstrate that the system is designed to accommodate up to the 1 in 100-year rainfall event, including a 45% climate change allowance.

3.4. FEH22 rainfall data should be provided in support of the calculations and sent directly to [Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk).

3.5. Please provide modelling of a surcharge scenario for the proposed drainage system. Assume pond is full up to lowest bank level.

3.6. As it cannot be demonstrated that flood risk will not increase either on-site or elsewhere, an **objection** is raised to the proposal.

### 4. Water quality

4.1. 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

5.1. 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

6.1. 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

7.1. A 20mm orifice is proposed to restrict flow into the pond. Due to the minimal diameter, we require this to be robustly protected (by design) from risk of blockage.

7.2. 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.

7.3.

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 .....
- ☒ None

[REDACTED]

[REDACTED]

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**Cc:** Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>

**Subject:** FP/65/26/HH

Please find the engineers consultation response attached; 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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