

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/70/26/HH	Reviewer Reference:	ADC/KW
Planning Officer:	Rhiannon Lloyd	Date of Review:	29/07/2026
Site Name:	5 Limmer Lane, Felpham, PO22 7EL		
Application Description:	Single storey rear extension. First-floor side extension with hip-to-gable roof conversion over. Garage remodelling with installation of PV panels on proposed new pitched 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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:

Lidsey Drainage Impact Assessment

Surface and Foul Water Drainage 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

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

has been provided to demonstrate that infiltration is a viable solution. It is the responsibility of the applicant or their drainage designer to provide this evidence. Without it, we are unable to assess whether the proposed development would increase flood risk. The applicant has also not demonstrated how they may drain the site if infiltration was later found not to be viable. For this reason, we object to the proposal. The submission of such evidence may also affect the scale and layout of the development.

To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of 1 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 Middleton-on-Sea 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.

As stated above, surface water from the site must be managed in accordance with the drainage hierarchy (Standard 1 of the NSfS). If infiltration is found to be unviable, then alternative sustainable means of draining the site are summarised as follows:

1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration –proposed but not investigated.
3. To a watercourse – none available.
3. To a surface water sewer – available, not investigated or proposed.
4. To a highway drainage system – Refer to West Sussex County Council.
5. To a combined sewer – none available.

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.

There are public surface water sewers located to the west, south and east of the property within the highway. One near the junction of Limmer Lane and Felpham Road, another running from Limmer Lane into Vicarage Lane and one in Waterloo Road heading south No information regarding any of these options has been submitted. If infiltration is not viable, the applicant would need to investigate the possibility of connecting surface water to these sewers.

The applicant would need to demonstrate that a gravity connection is achievable and provide evidence of necessary permissions and available capacity in the sewer.

The site is within a local flood risk zone [LFRZ_017] identified within the Lidsey surface water management plan, the plan is in place due in part to the recognised history of foul sewer flooding in the area.

2. Interception drainage

Subject to confirmation of the infiltration rates and the proposed permeable paving, adequate interception can be achieved. However, if infiltration cannot be demonstrated, additional interception measures will be required.

However, 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

Currently the site is in Flood Zone 1 (FZ1) but when the effects of Climate Change are introduced, it will fall into a future flood risk zone. The source of this risk has not been acceptably identified and no Flood Risk Assessment Submitted. The application should be supported by product 4 data for the site which can be requested from the Environment Agency. It is important that this information is submitted as it will demonstrate accurately the flood risk on the site and its source. SuDS features should not be located in fluvial flood zones. (Please see our guidance relating to this at www.arun.gov.uk/surfacewater).

At present, no modelling or supporting evidence; such as ground investigations or drainage plans have been submitted for engineering assessment in respect to surface water drainage. In the absence this evidence, 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 and we object to the proposal.

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. 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

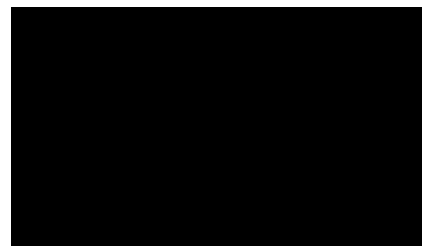
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

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

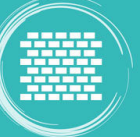
PL- Consultation- Engineers response



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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 Our core foundations	 
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 03 August 2026 10:37
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: FP/70/26/HH 5 Limmer Lane

Please find the engineers consultee comments attached; an objection.

Kind regards,

Kathryn Welch
Senior Planning Officer, Planning Department

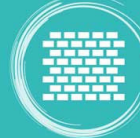
Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

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