

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/103/25/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Jonny Cooper	Date of Review:	21/01/2026
Site Name:	22 South Walk, Middleton-on-sea, PO22 7RN		
Application Description:	Single storey front extension and alterations to fenestration, following demolition of existing conservatory.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 Foul and Surface Water Drainage Statement**
- **Flood Risk Statement**

Consultation comments to the planning officer

0. General

- 0.1. 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. No formal drainage strategy has been provided. As it is unclear how surface water will be drained, the proposal may not accord with the drainage hierarchy as outlined in Standard 1 of the NSfS. Given this uncertainty, we cannot ensure that flood risk on the site or elsewhere will not be increased. Therefore, **we object to the proposal**, as it has not been demonstrated that the surface

water drainage for the carport will not increase flood risk. The submission of such evidence may have an impact on the size and scale of development.

1.2. The runoff destination for the proposed drainage strategy should comply with the hierarchy for sustainable drainage found in Standard 1, which can be summarised as follows:

1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration – may be viable but not investigated – see below.
3. To a watercourse – none available.
4. To a surface water sewer – a private surface water sewer can be found to the southwest in the highway, not investigated.
5. To a highway drainage system – none available.
6. To a combined sewer – none available.

1.3. 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.

1.4. Infiltration viability can only be confirmed with site investigations, including groundwater monitoring and infiltration testing. 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 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.

1.5. If it is later demonstrated that infiltration is not viable, then the only option for surface water disposal that we are aware of is the private surface water sewer system. The applicant has not demonstrated that they have a right to connect to this system or provided any agreed discharge information.

1.6. **Surface water must not be discharged into the foul sewer.** Any historic connection to the foul sewer does not justify future connections, in fact the NSfS and the SuDS Manual do not recognise the foul sewer as a discharge location.

1.7. 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. The site is within a local flood risk zone identified within the surface water management plan [LFRZ_024]. The plan states that flood risk from pluvial water and public sewers is high. With flooding during times of prolonged rainfall at the lowest point at the northern part of West Close. Therefore, it is important to ensure that future development does not exacerbate this problem.

2. Interception drainage

2.1. No interception features have been proposed. 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 does not sit within a current-day flood zone; however, it lies entirely within the future Flood Zone 3a. This is acknowledged within the Flood Risk Assessment but has not been accounted for in the design of the surface water drainage system. Furthermore, no evidence of the source of this flooding has been provided.

3.2. The submitted Flood Risk Assessment (FRA) does not provide robust or accurate hydraulic modelling, nor is it 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 accurately demonstrate the flood risk on the site and its source. SuDS features should not be located within fluvial flood zones (please see our guidance at www.arun.gov.uk/surfacewater). Without an accurate understanding of the flood risk on the site, we cannot assess whether the proposed drainage strategy is compliant. Therefore, **I object to the application.**

4. Water quality

4.1. No 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. No 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. No 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. No 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

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:

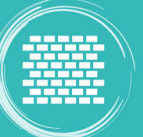
- ☐ Landscaping officer (proposed trees and landscaping)
- ☐ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public 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

PL- Consultation- Engineers response

Arun District Council, Civic Centre, Maltravers Rd
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<https://www1.arun.gov.uk/planning-application-finder>

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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: 21 January 2026 16:00
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Jonny Cooper <Jonny.Cooper@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: M/103/25/HH

Please find the engineers response attached; an objection

Thanks,

Kathryn Welch
Senior Planning Officer, Planning Department

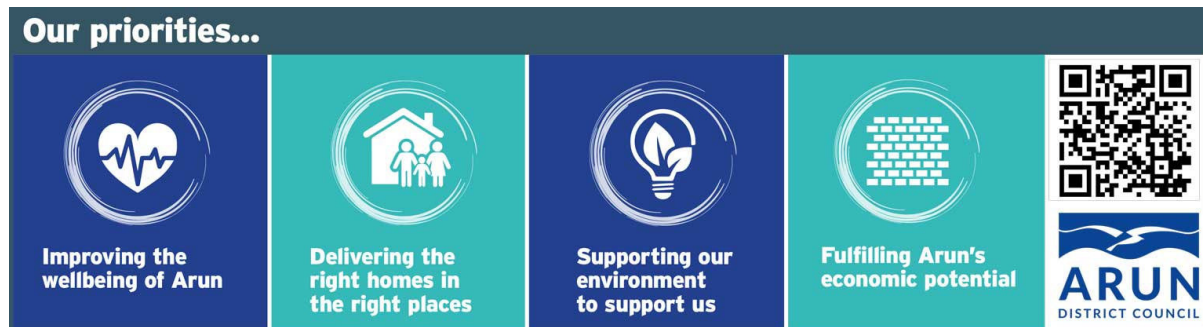
Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

T: 01903 737789

E: kathryn.welch@arun.gov.uk

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 05 January 2026 13:49

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: M/103/25/HH

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: M/103/25/HH
Registered: 12th December 2025
Site Address: 22 South Walk Middleton-on-sea PO22 7RN
Grid Reference: 496968 100168
Category: Householder
Description of Works: Single storey front extension and alterations to fenestration, following demolition of existing conservatory.

I am able to inform you that I have received an amendment to the above application dated 5th January 2026 relating to:- Amended description.

If you should wish to make further representations as a result of this amendment, please make any further comment by **5th February 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Jonny Cooper

Planning Case Officer- Arun District Council

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Email: jonny.cooper@arun.gov.uk

PLRECON (ODB) 2018