Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/17/26/HH	**Reviewer Reference:**	ADC/KW/PC
Planning Officer:	Susan Haley	**Date of Review:**	15/04/2026
Site Name:	Pirate Haven, 24 West Drive, PO22 7TS		
Application Description:	Proposed extension to useable first-floor decking area with replacement access staircase and balustrading.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	**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
Flood Risk Assessment

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. The designer has proposed that surface water falling on the new balcony will filter through the balconies surface infiltrating into the ground below. Whilst infiltration is the highest priority location on the drainage hierarchy (apart from water re-use which would not provide a full design solution) and accords with Standard 1 of the NSfS, no evidence to demonstrate that infiltration is a viable

solution has been submitted. For this reason, **we object** to the proposal. The submission of the required evidence may also have implications for the scale and layout of the development.

1.2. 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 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. It should also be noted that groundwater levels may be influenced by tidal conditions and therefore any groundwater monitoring should coincide with suitable high tides.

1.3. Standard 1 of the NSfS prioritised the following sustainable means of draining a site, we have summarised the constraints of this site against each priority option:

1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration – not adequately investigated.
2. To a watercourse – none available.
3. To a surface water sewer – mapping data shows a surface water drain to the east of the house at the very end of the garden.
4. To a highway drainage system – none available according to our records.
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.

The surface water drain identified on available mapping is of unknown origin and specification and may be redundant or decommissioned. Should infiltration be robustly demonstrated to be unviable, the applicant may wish to investigate the status, ownership and condition of this drain, including the feasibility of a connection. Where this option is pursued, the asset will need to be proven to be fit for purpose in terms of functionability and capacity, and full details submitted in support of the proposal. Any connection would need to operate under gravity; the use of pumped drainage solutions is strongly discouraged.

The site is within a local flood risk zone [LFRZ_022] 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. It states that flood risk within this zone from pluvial water, groundwater and public sewers is high. It states that “hydraulic overload of the foul sewer system has been confirmed.” The site is also within the |Lidsey Treatment Catchment Area. Therefore, it is important to ensure that future development does not exacerbate this problem.

2. Interception drainage

2.1. From the limited details provided, it is currently unknown if any interception features exist, or if they do, they have the capacity to accept any additional volume. 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.

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 proposed development introduces new built form within an area at risk of flooding. The site is wholly located within flood zone 3a – at high risk of flooding from rivers or the sea.

3.2. The area where the balcony extension is proposed is also at risk of surface water flooding in the 1% (medium risk) annual exceedance probability (AEP) event. A significant proportion of the front garden sits in an area at high risk (3.3% AEP). When including Climate Change the area where the balcony extension is proposed is at high risk (3.3% AEP)

3.3. The drainage for the proposed extension would place SuDS features in a pluvial flood area. The application does not demonstrate that the surface water drainage of the site would function under flood conditions. The applicant is advised to review ADC guidance on designing SuDS in flood risk areas at: https://www.arun.gov.uk/suds-in-flood-areas/

3.4. Due to the inadequate risk assessment, I **object** to the application. The applicant has not demonstrated that sufficient storage can be provided on site without increasing flood risk.

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. Without further evidence of the amenity benefits arising from the proposed SuDS being identified, 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 evidence of biodiversity benefits has been provided, and as such, Standard 6 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.

7. Construction, operation, maintenance, decommissioning and structural integrity

7.1. 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. 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

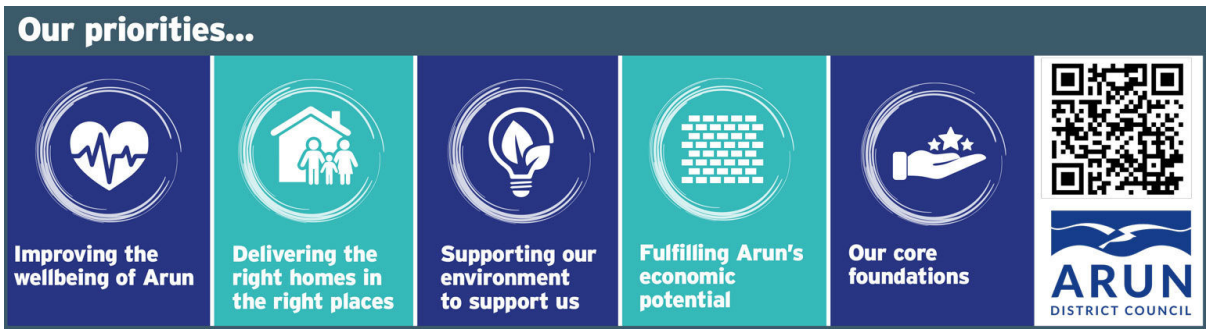
[redacted]

PL- Consultation- Engineers response

[redacted]

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 22 April 2026 09:57
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Susan Haley <Susan.Haley@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: M/17/26/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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