

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/20/26/PL	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Harry Chalk	Date of Review:	03/06/2026
Site Name:	86 Ancton Way Elmer PO22 6JP		
Application Description:	Demolition of existing bungalow and construction of replacement dwelling (resubmission following M/58/25/PL).		
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	No objection subject to condition.
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	No objection subject to conditions
4. Water Quality	Insufficient	Support
5. Amenity	Insufficient	Support
6. Biodiversity	Insufficient	Support
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:

- **Proposed Surface Water Drainage 006 PL4**
- **Flood Risk Assessment V3**
- **Management of Surface Water Run-off March 2026 Version 2**

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 proposes to drain the roof area of the new dwelling into two rain gardens running alongside both side boundaries via rainwater butts. All other hard surfaces, including the driveway, are to be of permeable construction. We are supportive of the use of infiltration as the second-highest priority disposal option (after water reuse). Two shallow infiltration test pits have been tested in accordance with industry guidance; these are shown on plan and positioned in the front and rear gardens. The slowest infiltration rate calculated was $2.9 \times 10^{-5} \text{ m/s}$. This is the rate that has been used to inform the SuDS design.

1.2. The design positions the permeable paving to the rear and the rain gardens at no lower than 9.425 m AOD, and the drive to the front at no lower than 9.440 m AOD. This is above the minimum allowable level of **9.370 m AOD**, as evidenced during the compliant groundwater monitoring undertaken in 2024/25. This is acceptable.

1.3. A site-specific porosity value of 75% has been agreed with the applicant and applied to the proposal. This now allows for plant species to mature within the garden without increasing the risk of flooding of the gardens.

1.4. It has been satisfactorily demonstrated that infiltration to the ground is a viable means of discharging surface water falling on the proposed building. Standard 1 of the NSfS has been met, we have **no objection subject to securing details via condition**.

2. Interception drainage

Water butts, permeable paving and rain gardens are proposed. As infiltration has been proven viable these are considered acceptable to accept extreme rainfall conditions.

2.1. Subject to securing details by condition **the proposal accords** with Standard 2 of the NSfS.

3. Extreme rainfall and flooding

3.1. The site is entirely within Flood Zone 3a. It is now proven by Product 4 data that the site is only affected by tidal flooding. SuDS are compatible in such areas. Further guidance on designing SuDS in tidal areas can be found at www.arun.gov.uk/surfacewater.

3.2. Calculations provided now reference a more appropriate porosity value. Also applied is the correct CV values, FEH22 data, urban creep and Climate change allowances. For the purposes of an application, these are acceptable.

3.3. The proposal accords with Standard 3 of the NSfS **and subject to condition we do not object to the proposal**.

4. Water quality

4.1. Adequate information regarding water quality has been provided and Standard 4 of the NSfS has been met.

4.2. Rainwater from the roof and hard surfaces such as the drive, have a low pollution hazard level and the site does not sit within a water sensitive area. It has been shown that SuDS mitigation indices for each of the pollutants are equal to or greater than the sums of the pollution hazard indices. The proposal accords with Standard 4 of the NSfS.

5. Amenity

5.1. It is proposed to include bioretention planters within the scheme, this is positively viewed and accords with Standard 5 of the NSfS. Accordingly, we support the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

6.1. It is proposed to include bioretention planters within the scheme, this is positively viewed and accords with Standard 5 of the NSfS. Accordingly, we support the proposal on these grounds, subject to a condition securing details of amenity benefits.

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

7.1. Information has been provided outlining the operational and maintenance requirements of the main components of the SuDS. Further details have been provided in respect of the raingardens which outline the key responsibilities and maintenance schedules including the fact that a maintenance plan will be handed over to the first owners of the property.

7.2. The submission of the additional information will not impact the size and scale of 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. It is recommended that the following condition be applied to any approval:

PCENG2 Engineers (Drainage) - HH drainage

Prior to the commencement of development, full details of the proposed surface water drainage system shall be submitted to, and approved in writing by, the Local Planning Authority.

The submitted scheme shall demonstrate compliance with the *National Standards for Sustainable Drainage Systems (SuDS)*, shall consider the surface water drainage hierarchy in full, and shall incorporate opportunities for amenity and biodiversity enhancement within the drainage design where feasible.

The full details submitted for approval shall include:

1. Sufficient Groundwater monitoring over an appropriate period.
2. Sufficient infiltration testing strictly in accordance with BRE DG 365 or similar approved, and at an appropriate time.
3. Details of the proposed method and location of surface water disposal.
4. Impermeable area plan.
5. Calculations modelling the surface water drainage network for the following storm events:
 - a. 100% Annual Exceedance Probability (AEP),
 - b. 10% AEP + climate change allowance,
 - c. 3.3% AEP + climate change allowance,
 - d. 1% AEP + climate change allowance.

All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,

6. Detailed drainage plans conforming to Local Planning Authority guidance.
 7. Specifications for all surface water drainage components and associated infrastructure.
 8. Any other relevant information in accordance with Local Planning Authority guidance.
- The system shall then be constructed in accordance with the approved plans and details. The surface water drainage system shall remain in good working order for the lifetime of the development unless agreed in writing by the Local Planning Authority.

Drainage Informative to go with PCENG2 (A) and (B)

INFORMATIVE: Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The infiltration tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method. All design storms must include a climate change allowance, as per <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> on rainfall intensity. Infiltration structures must cater for the critical 1 in 10 year storm event, (plus 40%) between the invert of the entry pipe to the soakaway and the base of the structure. All surface water drainage designs must also have provision to ensure there is capacity in the system to contain the critical 1 in 30 year + climate change allowance storm event without flooding. The 1 in 100 year + climate change allowance storm event must be retained on site without detriment to property, infrastructure or public safety.

Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest groundwater table in support of the design.

Designers are guided to refer to **National standards for sustainable drainage systems (SuDS)** and The SuDS Manual [C753] by CIRIA as these guide our decisions about the design, maintenance, and operation of sustainable drainage systems.

Further guidance notes and design checklists regarding surface water drainage are located at <https://www.arun.gov.uk/surfacewater> and <https://www.arun.gov.uk/designer-checklists>, on Arun District Council's website.

Please note: conditions and informative have recently been updated and may appear different from those found within saved systems.

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



From: Daun Johnson on behalf of Planning.Responses
Sent: 17 June 2026 11:30
To: Planning Scanning
Subject: FW: M/20/26/PL
Attachments: M-20-26-PL (3) 86 Ancton Way.docx

Please upload attachment to M/20/26/PL, planning, consultee response, ENG no obj subj to conditions

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 17 June 2026 11:11
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Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: M/20/26/PL

Please find attached the engineers consultation response, no objection subject to condition.

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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Our priorities...



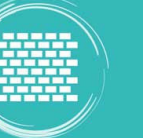
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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