

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/29/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Rhiannon Lloyd	Date of Review:	22/06/2026
Site Name:	16 Sea Way, Middleton-on-sea		
Application Description:	Garage to front of property.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 Surface water must not be discharged into the foul sewer.	Objection/Request for further information
2. Interception drainage	Insufficient	Objection
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:

Surface Water Drainage Strategy AEG6376_PO22_Middletononsea_05

Consultation comments to the planning officer

0. General

0.1. The submitted Drainage Statement refers to development which does not form part of this application. Whilst some of the information is pertinent to any new development on site, it does raise questions to this regarding this specific project.

1. Runoff destination

1.1. Groundwater monitoring undertaken between December 2024 and March 2025 indicates a high groundwater level peaking at 0.4m below ground level (bgl) in January. As such a high groundwater

level would not allow 1m of unsaturated ground below the base of any infiltrating feature, infiltration to ground has therefore been ruled out.

- 1.2. Instead, it is proposed to move down the hierarchy to the next priority destination, as defined by Standard 1 of the NSfS. Mapping data indicates that there are no suitable watercourses available for discharge; however, a private surface water drain is located approximately 40 m to the west.
- 1.3. A visual inspection undertaken by the applicant has indicated that this pipeline may be redundant. However, we believe this system to be non-redundant but possibly requiring work to ensure it is fully operational. The applicant has stated that they are prepared to undertake the necessary works to bring the drain back into use. Whilst it has been indicated that a CCTV survey has been undertaken, this has not been submitted as part of the application. How the pipe outfall currently discharges onto the beach/into the sea will also need to be assessed to ensure that it is fit for purpose. Furthermore, no evidence has been provided to demonstrate that the owner of the drainage system would permit a new connection.
- 1.4. It has been confirmed that an unrestricted discharge rate may be appropriate, given that the sewer ultimately discharges to a tidal waterbody, namely the English Channel. Whilst this is acceptable in principle, no evidence has been provided to demonstrate that the drain has sufficient capacity to convey these unrestricted flows. In addition, the contributing catchment area has not been identified on the submitted plans. Tidal locking may also need to be considered.
- 1.5. It is also acknowledged that any new connection to the private drain would need to operate via gravity drainage, as the use of a pumped solution would be strongly discouraged and would only be considered acceptable in exceptional circumstances. Whilst it is recognised that ground levels appear to fall from the site towards the location of the drain, no topographical survey has been submitted to confirm that a gravity-fed system can be achieved at this stage.
- 1.6. Water re-use measures would also be expected for a development of this nature. Although the Surface Water Drainage Strategy indicates that water butts will be utilised, this recommendation appears to relate to a different scheme. In any event, the installation of water butts would not affect the scale or layout of the development and could be secured by condition.
- 1.7. The application site falls within the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a Surface Water Management Plan due, in part, to a recognised history of foul sewer flooding. The site is located within a Local Flood Risk Zone identified within the Surface Water Management Plan (LFRZ_015). The plan states that flood risk from pluvial flooding and surcharge of the public sewer network is high.
- 1.8. Infiltration to the ground has been ruled out, and discharge to a surface water drain is considered acceptable in principle. However, at this stage, further information is required to demonstrate that a connection is feasible and can be delivered as proposed. We therefore have no option but to **object** until viability is proven.

2. Interception drainage

- 2.1. The applicant has indicated that interception of surface water can be achieved using a SuDS planter, however this appears to have been specified in connection with another scheme. As such no interception features have been provided for this scheme. As infiltration has been discounted,

interception features are imperative to ensuring compliance with Standard 2 of the NSfS. Features we could expect to see in a project of this size and scale include:

- 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 may affect the scale or layout of development and therefore cannot be secure by condition. **We object** to the proposal for this reason.

3. Extreme rainfall and flooding

3.1. Drainage calculations have been submitted; however, these appear to relate to a different development proposal and are therefore not applicable to the current application.

3.2. The site is located within an area identified as future Flood Zone 3a. The application should therefore be supported by Environment Agency Product 4 data, as the use of publicly available, non-site-specific datasets may not provide an accurate representation of future flood risk at the site.

3.3. Furthermore, an area at the front of the proposed dwelling is shown to fall within the future 0.1% Annual Exceedance Probability (AEP) surface water flood extent. This area appears to interact with the footprint of the proposed garage and, as such, further assessment is required to demonstrate the implications of future flood risk for the proposed development.

3.4. These events (3.3) may need to be accounted for in any design. For further guidance, please refer to our *SuDS in Flood Areas* document available online at www.arun.gov.uk/surfacewater.

3.5. At present, no modelling or supporting evidence specific to this development; such as ground investigations or drainage plans have been submitted for engineering assessment. In the absence of 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

4.1. Insufficient evidence of water quality benefits has been provided, and as such, Standard 4 of the NSfSDS 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 NSfSDS 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 NSfSDS 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. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfSDS. 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

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]

[REDACTED]

[REDACTED]



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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 25 June 2026 15:38
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd
<Rhiannon.Lloyd@arun.gov.uk>
Subject: M/29/26/HH

Please find the engineers 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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