

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/32/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	31/07/2026
Site Name:	60 Sea Way Middleton-on-sea PO22 7SA		
Application Description:	Demolition of the existing dwelling and garage and erection of 1 No. replacement self build dwelling. This application is in CIL Zone 4 and is CIL Liable as a new dwelling.		
Assessment Number:	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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Insufficient	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
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:

- SuDS ON PLOT ATTENUATION
- FRA AND DRAINAGE STRATEGY
- FRA AND DRAINAGE STRATEGY PART 2
- LOCATION PLAN 2021/87/I01 REVB
- BLOCK PLAN 2021/87/L02 REVC
- BLOCK PLAN 2021/87/L02 REVB
- PROPOSED FLOOR PLANS 2021/87/P01 REVA
- **RESPONSE TO DRAINAGE OBJECTION 17/7/2026**
- **SOUTHERN WATER RESPONSE, 3 DIFFERENT RESPONSES**

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- Drawing 000-BPC-WD-ZZ-D-C PL500 P3 Preliminary Levels and Drainage

Consultation comments to the planning officer

0. General

- 0.1. The site is at risk of tidal flooding within the lifespan of development. The Environment Agency will advise on flood risk from main river and tidal sources.
- 0.2. Sequential Testing requirements may apply due to the future year flood zone but we note there is no net increase in dwellings.
- 0.3. The extent of existing surface water flood risk is acceptable and will be reduced by the introduction of a modern sustainable drainage system.
- 0.4. The development is demolition of the existing dwelling and construction of a new dwelling served by a new drainage system and therefore will affect drainage on and off site. The development requires sustainable drainage in accordance with NPPF Paragraph 182. The application is non-major and the measures should be proportionate to the nature and scale of development.
- 0.5. We have reviewed the Letter dated 17 July 2026 with responses to our comments within.

1. Runoff destination

- 1.1. Rainwater harvesting is proposed with significant storage capacity and is acceptable subject to technical design.
- 1.2. The ground investigation information provided strongly indicates that discharge to ground via infiltration would not be viable including for permeable pavement. Therefore the proposed method of disposal of surface water to the public surface water sewer is acceptable in principle subject to confirmation of capacity from the Sewerage Undertaker.
- 1.3. The applicant should provide evidence that the flow are acceptable to the asset owner. There is a letter from Southern Water to Arun DC dated 7 July stating that capacity is being checked by their modelling team and an expected response date of 28 July is indicated. This has superseded to the Applicants request for capacity check as set out in the consultant's response letter. We await confirmation from the Statutory Undertaker. Please note, the peak flow rate accepted by the asset owner may be higher than the greenfield runoff rate and design peak rate.
- 1.4. We have received confirmation from Southern Water of capacity in the receiving sewer.

2. Interception drainage

- 2.1. Interception drainage is provided by a combination of permeable paving, rainwater harvesting and 'SuDS pods'. The proposals are proportionate to the nature and scale of development and are therefore acceptable.

3. Extreme rainfall and flooding

- 3.1. A flow rate of 0.5 litres per second is proposed which is acceptable. Blockage protection measures can be incorporated at technical design stage.
- 3.2. Rainwater harvesting may be full during a winter storm unless there is integral flow control and may therefore require a separate attenuation facility. This is now addressed in the calculations.
- 3.3. The surface water sewer is likely to be surcharged during the design storm and a suitable downstream surcharge level is incorporated into the calculations.
- 3.4. The revised calculations within the 17 July letter report are acceptable.

4. Water quality

- 4.1. The treatment proposed by the permeable paving is acceptable for the driveway.
- 4.2. Removal of silt and debris from roof drainage can be addressed through detailed design.

4.3. Water quality is acceptable subject to technical design.

5. Amenity

5.1. The limited amenity value provided by the 'SuDS pods' is proportionate to the nature and scale of development and is acceptable on that basis.

6. Biodiversity

6.1. The limited biodiversity value provided by the 'SuDS pods' is proportionate to the nature and scale of development and is acceptable on that basis.

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

7.1. No concerns are raised regarding the construction and structural integrity of the design.

7.2. A maintenance plan can be provided as part of a detailed design to discharge a planning condition.

8. Suggested conditions / Overcoming the objection

8.1. The following condition is proposed to control the technical design and implementation of the sustainable drainage system and the successful long term management and maintenance of the system.

Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The full details submitted for approval shall include:

1. Detailed drainage plans conforming to Local Planning Authority guidance,
2. Specifications for all surface water drainage components and associated infrastructure and flow control mechanisms,
3. Confirmation of approval of connection to third party infrastructure,
4. A maintenance plan for the surface water drainage system,
5. Impermeable area plan,
6. Calculations modelling the surface water drainage network for the following storm events: a.) 100% Annual Exceedance Probability, b.) 10% AEP + climate change allowance, c.) 3.3% AEP + climate change allowance, and d.) 1% AEP + climate change allowance. All storm events must include an allowance for urban creep and surcharged outfalls where appropriate.

The scheme shall then be constructed as per the approved plans. No building shall be occupied until the complete surface water drainage system serving that building has been implemented in accordance with the agreed details. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority. The local authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan and the NPPF. This is required to be a pre commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

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]

From: Elaine Walby on behalf of Planning.Responses
Sent: 31 July 2026 16:53
To: Planning Scanning
Subject: FW: Planning Consultation on: M/32/26/PL
Attachments: M-32-26-PL - 60 Sea Way Middleton-2 updated.docx

[REDACTED]

[REDACTED]

[REDACTED]

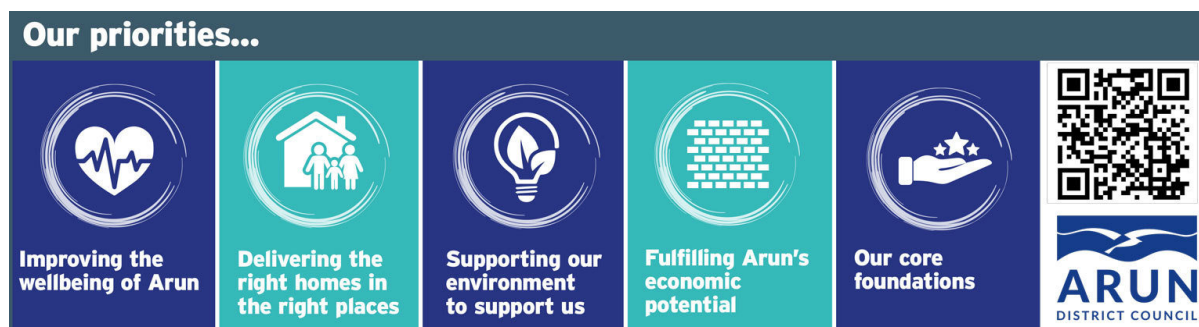
[REDACTED]

[REDACTED]

[REDACTED]

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<https://www1.arun.gov.uk/planning-application-finder>



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 31 July 2026 09:58
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: M/32/26/PL

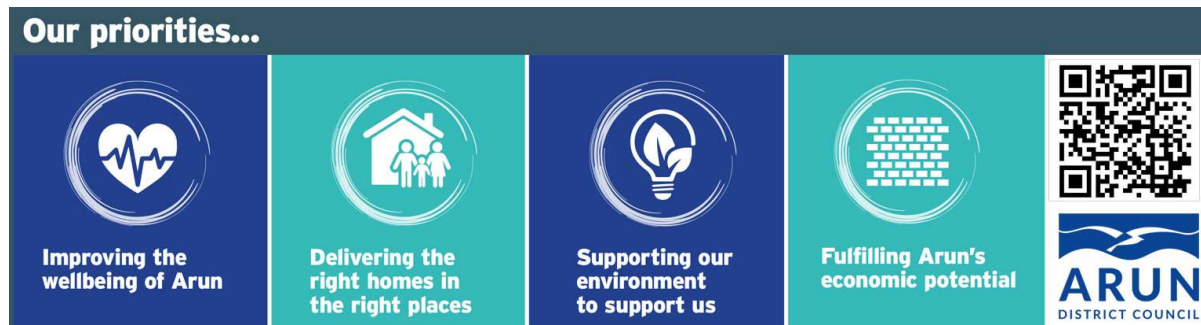
Please find enclosed our consultants revised consultation, following further information being provided. No objection subject to a condition being applied.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Paul Cann
Sent: 29 July 2026 17:10
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: M/32/26/PL

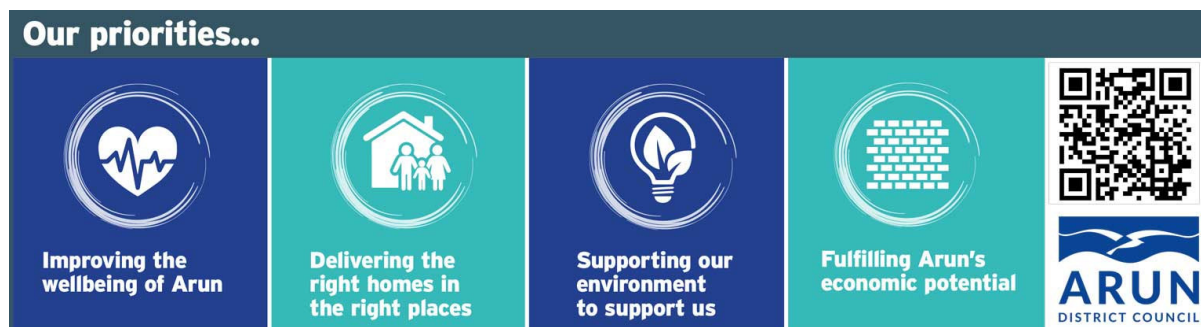
Please find enclosed our consultants response, an objection.

Regards

Paul Cann
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 20 July 2026 15:05
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: M/32/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: M/32/26/PL
Registered: 8th June 2026
Site Address: 60 Sea Way Middleton-on-sea PO22 7SA
Grid Reference: 496818 99811
Category: Plan Applicat'n
Description of Works: Demolition of the existing dwelling and garage and erection of 1 No. replacement self build dwelling. This application is in CIL Zone 4 and is CIL Liable as a new dwelling.

I am able to inform you that I have received an amendment to the above application dated 20th July 2026 relating to:- Response to drainage objection

If you should wish to make further representations as a result of this amendment, please make any further comment by **30th July 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

Harry Chalk

Planning Case Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk

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