

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/33/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Jonny Cooper	Date of Review:	10/07/2026
Site Name:	Padraig Place, 6 Ancton Way, Elmer, PO22 6JN		
Application Description:	Rear extension with doors onto the garden; replacement of 1no. rear window and the regularisation of the existing annex space.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 Foul Drainage 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. The designer proposes to discharge surface water to the existing drainage system. However, no details of this system, including its capacity or suitability to receive additional flows, have been provided. As such, the proposal does not accord with Standard 1 of the NSfS, as a discharge location in accordance with the drainage hierarchy has not been demonstrated. Consequently, it has not been shown that the site can be drained sustainably and, therefore, **we object to the proposal**.

- 1.2. Standard 1 of the NSfS states that runoff from development shall be discharged to the final destination in accordance with the following hierarchy:
- 1 – Collected for non-potable use.
 - 2 – Infiltration to the ground – not proposed and not investigated.
 - 3 – Discharge to an above ground surface water body – there is an ordinary water course to the west of the property.
 - 4 – Discharge to a surface water sewer – private surface water sewer to highway.
 - 5 – Discharged to a combine 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. In this case, no groundwater monitoring or infiltration testing has been submitted, meaning infiltration to ground, being a higher priority discharge method, has not yet been ruled out and must be properly assessed before considering subsequent options.
- 1.4. To achieve an infiltration design, winter groundwater levels must be monitored to ensure that 1m of unsaturated ground is allowed for between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential are very variable in Middleton-on-Sea. Infiltration can be possible, but in parts, groundwater can be high or infiltration rates so low as to make infiltration unviable. This must be demonstrated by the applicant.
- 1.5. An ordinary watercourse can be found 35m to the west of site. The Lead Local Flood Authority (LLFA - WSCC) is the risk management authority for the ordinary watercourse. No evidence has been submitted to demonstrate that they have consented to the proposed works through the Ordinary Watercourse Consent process. Furthermore, the proposed discharge rates, volumes or flow parameters for discharge to the watercourse will also need to be agreed by this Authority. This is an expectation of the NSfS. Consent may also be required from the LLFA for any proposed works to the watercourse.
- 1.6. In addition Arun District Council consent relating to the Land Drainage Bylaws may also be required. Please contact ADC at land.drainage@arun.gov.uk. If permission from the relevant authority is not obtained for the principle of discharging to the watercourse, then it is unclear how the applicant may drain surface water from the site.
- 1.7. A private surface water drain has been identified 25m to the south in the western grass verge of The Layne. Permission from the owner of the drain will be required, as will the evidence to prove that the system is fit for purpose and has capacity to take the additional flow. Topographical information would also be required as pumped systems are only allowable under exceptional circumstances.
- 1.8. 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_013]. The plan states that flood risk from pluvial water, groundwater and public sewers is high. It states that “hydraulic overload of the foul sewer system has been confirmed.

2. Interception drainage

2.1. The applicant has proposed a rain garden, but no further details have been provided. 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. Mapping data places the site at a future risk of flooding, in Flood Zone 3a. The source of this risk has not been acceptably identified and no Flood Risk Assessment Submitted.

3.2. The application should be 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 demonstrate accurately the flood risk on the site and its source. SuDS features should not be located in fluvial flood zones. (Please see our guidance relating to this at www.arun.gov.uk/surfacewater). Without an accurate understanding of the flood risk on the site, we cannot assess if the proposed drainage strategy is compliant. Therefore, **I object to the application.**

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. Insufficient 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. Insufficient 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. 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

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 15 July 2026 10:17
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Jonny Cooper <Jonny.Cooper@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: M/33/26/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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