

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/40/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	17/08/2026
Site Name:	Arundel Court 47 Elmer Road Middleton-on-sea PO22 6LB		
Application Description:	Two storey rear extension to enlarge existing flats and additional second floor to building to create an additional 2No. 2 Bed flats giving an overall total of 6No. 2 Bed flats. 6No. parking spaces to the rear consisting of a 3 car garage block and 3 parking bays and associated hardscaping. This application is in CIL zone 4 (zero rated) as flats.		
Assessment Number:	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further Information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to condition
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Further Information
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection subject to condition

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY (INCLUDING LIDSEY DRAINAGE IMPACT ASSESSMENT) Appendices A-J
- FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY (INCLUDING LIDSEY DRAINAGE IMPACT ASSESSMENT)

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

Consultation comments to the planning officer

0. General

- 0.1. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.2. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.3. The site is within a future year tidal flood zone and may be at risk of flooding during the lifespan of the development. The Environment Agency provides advice on flood risk from sources from main rivers and seas.
- 0.4. The Planning Authority should consider whether Sequential Testing is required due to the flood risk anticipated during the lifespan of the development.
- 0.5. The site is not at significant risk of flooding from surface water and the introduction of a new sustainable drainage system will reduce or remove the small areas of risk for the future year 1% AEP storm.

1. Runoff destination

- 1.1. Water butts are proposed to be provided and are suitable for small scale residential use irrigation.
- 1.2. Due to high groundwater and poor infiltration as demonstrated by the ground investigation, infiltration is not viable at this site as a method of disposal of surface water runoff.
- 1.3. The drainage survey indicates that part of the site may currently discharge to the public foul water sewer. As pointed out in the Southern Water consultation response, discharge of surface water to a public foul sewer is not acceptable. Therefore discharge via the existing connection is not available.
- 1.4. The proposed drainage strategy is to make a new connection to a highway drain. This will require the approval of the Local Highway Authority as asset owner. This should be evidenced in principle at planning stage to evidence the feasibility of the proposed point of discharge.
- 1.5. The runoff destination is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. Permeable paving is proposed for the external paved surfaces which is permissible for the self-drained area of the permeable pavement.
- 2.2. The roof areas are not served by a separate allocation of interceptions drainage.
- 2.3. The proposed layout constrains options for surface features but options such as green roof or planters could be considered for the roof areas.
- 2.4. Further investigation and increased provision for interception drainage should be provided where feasible.

3. Extreme rainfall and flooding

- 3.1. The outfall position, flow control and storage levels are dependant upon the point of discharge and needs to be confirmed to be feasible as set out for Standard 1.
- 3.2. The drainage design incorporates permeable paving as an attenuation blanket upstream of a fixed flow control.
- 3.3. The surface levels of the permeable paving in the area of storage vary by more than the effective depth of the storage. The calculations are based upon flat storage whereas the layout plan indicates constant depth of construction. The storage within the permeable paving may therefore not fill as represented in the calculations.

- 3.4. The proposed design peak outflow is 1 litre per second which is based upon a relaxation to 5 times average greenfield runoff rate. The justification for relaxation is not clear and the designer should restrict to greenfield runoff unless it is not feasible to do so. The peak outflow may therefore be higher than necessary, and not in accordance with the NSfS.
- 3.5. The surcharged scenario noted in the report words is not shown in the calculations. The basis for the surcharge level should also be set out as part of the modelling methodology.
- 3.6. The design to manage extreme rainfall is not currently demonstrated to be in accordance with the requirements of NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. The proposed permeable paving would provide adequate water quality mitigation for the development and are acceptable subject to confirmation through technical design, which can be required by planning conditions.

5. Amenity

- 5.1. The existing site is developed and entirely impermeable.
- 5.2. The design proposals include permeable paving and may include planters / SuDS Pods although these are not currently shown on the drainage layout plan.
- 5.3. Due to the small scale of the development and use of the site, together with the limited opportunities for incorporating amenity value delivered through the sustainable drainage system, the limited additional multifunctional elements beyond permeable paving and water butts would be proportionate to the nature and scale of development.
- 5.4. The proposed provision to enhance amenity should be clarified and may qualify for a 'small sites' exception.

6. Biodiversity

- 6.1. The report notes SuDS Pods / Planters but these are not shown on the drainage layout plan and the sizes are not known.
- 6.2. The proposed provision to enhance biodiversity should be clarified and may qualify for a 'small sites' exception and not require assessment by an Ecologist.

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

- 7.1. There is no significant concern regarding the construction and operation, structural integrity or decommissioning of the proposed strategy.
- 7.2. There is no Management and Maintenance Plan submitted with the application. The details of this can be the subject of a planning condition which requires a detailed management and maintenance plan prior to commencement of development which sets out ownership and maintenance responsibility and how they will be delivered throughout the lifespan of the development.

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**Local Highway Authority, WSCC**
- ☐ None

Arun District Council, Civic Centre, Maltravers Rd
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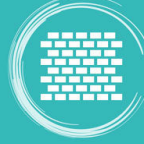
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 18 August 2026 12:48
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: M/40/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 21 July 2026 12:41
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: M/40/26/PL

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No:	M/40/26/PL
Registered:	21st July 2026
Site Address:	Arundel Court 47 Elmer Road Middleton-on-sea PO22 6LB
Grid Reference:	497568 100415
Description of Works:	Two Storey rear extension to enlarge existing flats and additional second floor to building to create an additional 2No. 2 Bed flats giving an overall total of 6No. 2 Bed flats. 6No. parking spaces to the rear consisting of a 3 car garage block and 3 parking bays and associated hardscaping. This application is in CIL zone 4 (zero rated as flats).

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 20th August 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk