

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/40/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	24/09/2026
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:	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	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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection subject to condition
2. Interception drainage	Insufficient	Further Information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to condition
5. Amenity	Compliant	No objection subject to condition
6. Biodiversity	Compliant	No objection subject to condition
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)
- DRAINAGE CONSULTEE OBJECTION RESPONSE. 21.08.2026**
- EMAILS REGARDING DRAINAGE COMMENTS AND RECONSULT REQUEST 04.09.2026**

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 development is non-major. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage proportionate to the nature and scale of development in accordance with NPPF Section F8.
- 0.2. 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.
- 0.3. The Planning Authority should consider whether Sequential Testing is required due to the flood risk anticipated during the lifespan of the development.
- 0.4. The site is not at significant risk of flooding from surface water and the introduction of a new sustainable drainage system would reduce or remove the small areas of risk for the future year 1% AEP storm.
- 0.5. We have reviewed the letter report ref D2317 dated 21 August 2026.

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. An indication of acceptance is received from West Sussex County Council sufficient for planning stage. This indicates the connection should be made to the chamber and not the pipe as currently shown. More formal approval can be provided at discharge of conditions stage.

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 currently served by a separate allocation of interception drainage. There is a note on the drawing indicating SuDS planters but the total size is unknown.
- 2.3. The letter report states it is not possible to provide interception drainage, however, the position that it is not possible to incorporate any interception drainage or any form for the roof areas is based upon to the proposed external plan layout and both building designs being a fixed constraint on the drainage design. The letter report also states that there is no demand for non-potable water and therefore rainwater harvesting is not a solution, but this ignores use of rainwater harvesting for non-potable uses in residential buildings.
- 2.4. The garage building could also be considered for a flat roof arrangement allowing for green roof.
- 2.5. The provision for interception drainage should be increased.

3. Extreme rainfall and flooding

- 3.1. The drainage design incorporates permeable paving as an attenuation blanket upstream of a fixed flow control.
- 3.2. The surface levels of the permeable paving in the area of storage vary by more than the effective depth of the storage. The calculations have now been updated and appear to reflect a sloping

subbase arrangement. Whilst this cannot be audited due to limitations in the software selected, we are reasonably confident this has been correctly modelled.

- 3.3. 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.
- 3.4. The potential to relax the peak flow rate would be due to site constraints. No relaxation has been agreed for this site and the peak flow rate should be the greenfield runoff rate or as close as feasible. There are flow control solutions and blockage protection methods which allow low rates of 0.2 litres per second which could therefore be applied.
- 3.5. A surcharged outlet is now shown in the calculations. However, the basis for the surcharge level set out in the letter report is not robust. The surcharge is only 220mm which implies the highway drain running full-bore but not a surcharged system during a 100 year return period (1% AEP) storm. There is likely to be a surcharged network during the 1% AEP plus climate change design storm with water levels far exceeding top of pipe in the chamber. Particularly considering highway drainage is not designed for a 1% AEP storm. A precautionary approach should be adopted where conditions are not known.
- 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 water butts and include permeable paving and SuDS planters are noted on the drainage layout to be added at detailed design stage, which is sufficient.
- 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 multifunctional elements of permeable paving and water butts, together with the proposed SuDS planters would be proportionate to the nature and scale of development.

6. Biodiversity

- 6.1. Due to the existing impermeable area, the site qualifies for a 'small sites' exception and does not require assessment of the SuDS biodiversity enhancement by an Ecologist.
- 6.2. SuDS planters are noted on the drainage layout to be added at detailed design stage, which is sufficient for the scale and nature of the development in the context of a small sites exception.

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
- ☐ None

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 October 2026 10:14
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@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

T: 01903 737819
E: paul.cann@arun.gov.uk

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Littlehampton, West Sussex, BN17 5LF
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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 04 September 2026 16:34

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: M/40/26/PL

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

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
Category: Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 1st September 2026 relating to:- Drainage consultee objection response.

If you should wish to make further representations as a result of this amendment, please make any further comment by **19th September 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

Kathryn Welch

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