

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/42/26/HH	Reviewer Reference:	ADC/KW
Planning Officer:	Silvie Steiningerova	Date of Review:	07/08/2026
Site Name:	2 Old Point, Middleton-on-sea		
Application Description:	First floor rear extension, single storey side extensions and an additional 3 No. roof dormers.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 Drainage Impact Assessment

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 drain surface water to 1 or 2 new soakaways. We support the use of infiltration as the second highest priority method of surface water disposal (after water reuse); however, the necessary evidence to demonstrate that infiltration is viable has not been provided. Fundamental information, such as groundwater monitoring data and infiltration testing results, have not been provided. Furthermore, should infiltration be proven unviable, no alternative discharge

location has been identified. Consequently, it has not been demonstrated that the site can be sustainably drained, and **we object** to the proposal.

1.2. 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.

1.3. 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 – proposed but not proven
- 3 – Discharge to an above ground surface water body – Sea – English Channel
- 4 – Discharge to a surface water sewer – public surface water sewer in Sea Lane
- 5 – Discharged to a combined sewer – none available.

1.4. 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.

1.5. A public surface water sewer can be found running along the eastern side of the highway in Sea Lane, running directly past the western boundary of site.

1.6. No evidence or permission has been provided to confirm whether discharge to the public drainage system is permitted, or whether the drain has sufficient hydraulic capacity. The applicant has not provided any further information on how they may drain the site if infiltration is later found to be unviable or the connection to the surface water sewer can be achieved.

1.7. The application site falls partly 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.

2. Interception drainage

2.1. The applicant has indicated that interception of surface water can be achieved using water butts. If, when evidence is presented, infiltration is found to be unviable, measures to include interception drainage will need to be added.

2.2. 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.

- 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.

2.3. 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. The site is wholly located within an area identified as a future Flood Zone. The source of this flooding has not been identified but it is likely to come from tidal sources. The application should therefore be supported by Environment Agency Product 4 data to ensure the source of flooding is confirmed, as the use of publicly available, non-site-specific datasets may not provide an accurate representation of future flood risk at the site.
- 3.2. The flood risk on site may need to be accounted for in the design. For further guidance, please refer to our *SuDS in Flood Areas* document available online at www.arun.gov.uk/surfacewater.
- 3.3. 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 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. 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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