

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/58/25/PL	Reviewer Reference:	ADC/SB
Planning Officer:	Harry Chalk	Date of Review:	27/10/2025
Site Name:	86 Ancton Way Elmer PO22 6JP		
Application Description:	Demolition and erection of 1 No dwelling (resubmission following M/22/25/PL). This application is in CIL Zone 4 and is CIL Liable as a new dwelling.		
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
----------	-----------

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

- **Proposed Surface Water Drainage 006 PL3**
- **Flood Risk Assessment & Management of Surface Water Run-off - February 2025**

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 the new dwelling and associated patio and driveway to 2 infiltration blankets at the front and rear of the house. We are supportive of the use of infiltration as the second highest priority disposal option (after water reuse); however, the designer has not adequately

demonstrated that infiltration is viable. Nor have they presented any evidence of an alternative disposal location should that be the case. Therefore, it has not been demonstrated that the site can be sustainably drained, and an **objection** must be lodged.

- 1.2. Groundwater monitoring has been submitted that demonstrates that peak groundwater levels are 1.23m below ground level (0.22m above the base of a slotted pipe to a depth of 1.45m below ground level). Ground level at the monitoring point was 9.6mAOD, and the base would be 8.15mAOD. This means that the groundwater peaked at 8.37mAOD.
- 1.3. To comply with the national standards for SuDS and The SuDS Manual the design must allow for 1m of unsaturated ground between the base of the infiltration blankets and the peak groundwater level. This would mean that the base of the blankets would need to be set 9.37mAOD. Both infiltration blankets are set lower than this and would need to be raised to be compliant.
- 1.4. It is assumed that this could be achieved within the confines of the site. However, the applicant has not submitted adequate infiltration testing to demonstrate that infiltration at this depth is viable. Furthermore, the applicant would have to demonstrate that infiltrating at these depths would not be into made ground. No evidence of the geological strata has been submitted.
- 1.5. Two rounds of infiltration testing have been submitted. These are both claimed to be from the neighbouring property 88 Ancton Way. The trial pit dimensions are not compliant with BRE DG 365, and the depths do not replicate the depths of the proposed infiltration features.
- 1.6. Furthermore, the shallower tests, completed at 0.6m below ground level, were not submitted to support the application at the neighbouring site. Indeed, only one photograph of the trial pit has been submitted, that at 1m depth. It is unclear who completed these tests, or why they were not submitted previously. It is suggested that an accompanying report by the ground investigator may assist in clarifying the uncertainty regarding the testing. Until further clarity is provided the infiltration testing completed at 0.6m depth is considered unreliable and unsuitable for the purposes of the design.

2. Interception drainage

2.1. Infiltration to the ground is proposed, which would provide an appropriate means of intercepting surface water. However, should infiltration prove unviable, alternative methods of interception would be required. In recognition of the National Planning Policy Framework's guidance that SuDS should be proportionate to the nature and scale of the proposal, we are willing to accept that, for a project of this size, the following interception features can demonstrate compliance without the need for 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. The site is entirely within Flood Zone 3. The FRA appears to attempt to show that the site is in an area of low flood risk, despite the Flood Zone classification. It is not 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, whereas they are acceptable in tidal ones. (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.

3.2. Preliminary calculations have been submitted to demonstrate that the volumes of the proposed infiltration blankets are adequate for the site. These do not clearly show that urban creep has been applied, or that a CV value of 1 has been used, we rely on the written confirmation of this within the FRA. This would require further detail and clarification for the final design, but are not a reason for objection at this stage.

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

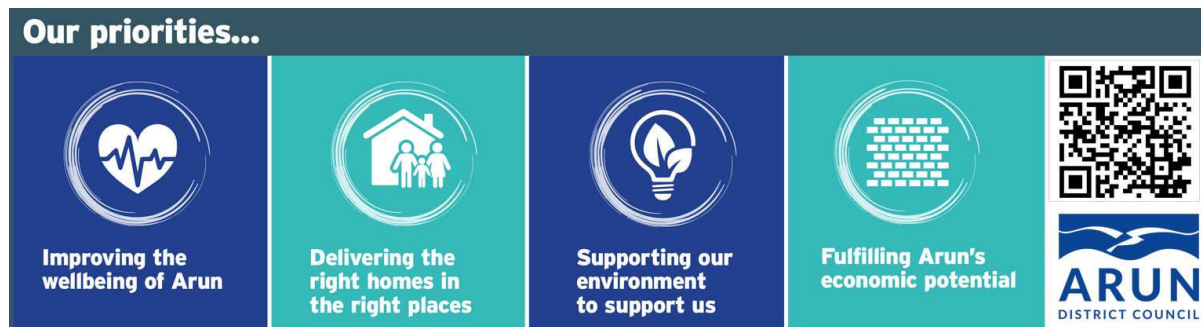
[REDACTED]

Drainage Engineers response

[REDACTED]

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

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 27 October 2025 15:45
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: M/58/25/PL

Hi Harry,

Find the consultation – an objection – attached. Apologies for the delay in response.

Kind regards

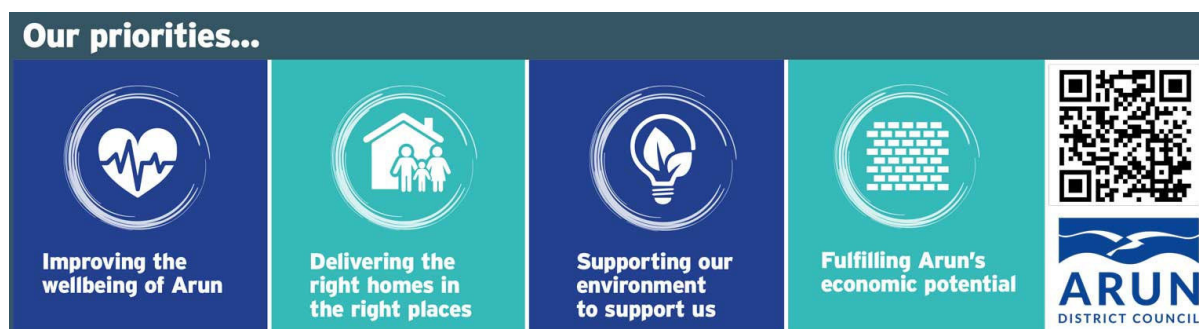
Sarah Burrow

Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737815

E: sarah.burrow@arun.gov.uk

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



From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 18 July 2025 08:19

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

Subject: Planning Consultation on: M/58/25/PL

To: **Engineers (Drainage)**

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/58/25/PL

Registered: 16th July 2025

Site Address: 86 Ancton Way Elmer PO22 6JP

Grid Reference: 498828 100380

Description of Works: Demolition and erection of 1 No dwelling (resubmission following M/22/25/PL).
This application is in CIL Zone 4 and is CIL Liable as a new dwelling.

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.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 21st August 2025 . 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

Harry Chalk

Planning Officer- Arun District Council

Telephone: 01903 737577

Email: harry.chalk@arun.gov.uk

PLCONSULT (ODB) 2020