

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/58/25/PL	Reviewer Reference:	ADC/KW/SB
Planning Officer:	Harry Chalk	Date of Review:	12/12/2025
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:	2 of 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	No objection subject to condition.
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- Revision B November 2025**
- **EA product 4 data**

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). Despite further information being submitted the designer has still 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. Further to our previous review, an amended design has now positioned the infiltration blankets to both the front a rear garden no deeper than 9.440m, this is above the minimum allowable level of 9.370. This is broadly acceptable.
- 1.3. Details of the two sets of infiltration testing have now been provided. The applicant states that these tests are sufficient and have been undertaken in accordance with relevant guidance (BRE 365 and Part H of the Building Regulations). It has been explained that testing was carried out during works on a neighbouring property, where the trial pits (located on the boundary between properties) encountered chalk at 0.8 m depth. During those works, it was acknowledged that there was little variation in ground conditions across the site, resulting in foundations of the neighbouring building being positioned at approximately 1 m below ground level into the chalk layer. The agent asserts that there is no reason why this site would differ, nor any reason to discount the findings of Herbert Stumpp Ltd, who observed the testing at the time.
- 1.4. Objections to the quality of the infiltration testing remain valid. Clear evidence of the strata composition and confirmation that infiltration into made ground has not occurred have not been provided. Even if the descriptive findings of Herbert Stumpp Ltd are accepted at face value, testing was not undertaken at the correct depth to confirm that infiltration is viable.
- 1.5. One of the trial pits does not meet the size requirements set out in BRE 365, which stipulates trial pits should measure a minimum of 1m in length and 0.3m in width. The applicant claims that the overall calculation method is recognised by BRE 365 and Approved Document H of the Building Regulations (which allows smaller pits). However, BRE 365 specifically requires trial pits of the above dimensions, which then goes to form part of the calculation method. The methodology used in Approved Document H is not recognised or referred to by The SuDS Manual or the National Standards for SuDS and consequently is not accepted.
- 1.6. No alternative disposal location has been identified by the applicant, and infiltration, although likely, has not been proven viable. There remains a risk that a compliant disposal location for rainwater will not be achieved. Furthermore, it would not be reasonable to lift the objection and secure the disposal location via condition as further evidence may affect the size and scale of the proposed development.

2. Interception drainage

Now proposed are rainwater butts and bioretention garden planters. Should infiltration be proven viable this would be acceptable. 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.

2.1. These features are unlikely to 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. It is now proven by Product 4 data that the site is only affected by tidal flooding. SuDS are compatible in such areas. Further guidance on designing SuDS in tidal areas can be found at www.arun.gov.uk/surfacewater. As it stands our objection on these grounds is lifted.

3.2. Preliminary calculations have been submitted to demonstrate that the volumes of the proposed infiltration blankets are adequate for the site. It has now been clarified that urban creep has been applied and that a CV value of 1 has been used. However, 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. It is understood that rainwater from residential roofs is generally considered safe, as only debris needs to be collected. The submission of this evidence is unlikely to affect the scale or layout of the development. The permeable paving of the driveway is also likely to provide adequate water treatment for its use. 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. It is proposed to include bioretention planters within the scheme, this is positively viewed and accords with Standard 5 of the NSfS. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

6.1. It is proposed to include bioretention planters within the scheme, this is positively viewed and accords with Standard 5 of the NSfS. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity 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

From: Breezie Allwright
Sent: 16 December 2025 09:32
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Attachments: M-58-25-PL - 86 Ancton Way 2nd.docx

M/58/25/PL
PL- consultation- engineers response

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Supporting our environment to support us

Fulfilling Arun's economic potential

From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
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Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: M/58/25/PL

Please find attached the engineers second response on the above application; 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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