

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/60/26/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Silvie Steiningerova	Date of Review:	28/09/26
Site Name:	4 The Hard, Elmer, PO22 6JS		
Application Description:	Front roof extension to facilitate the creation of first floor, new porch canopy and replacement of chimney with metal stove flue.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

No drainage documents were submitted for review.

Consultation comments to the planning officer

0. General

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

It is proposed to connect into the existing surface water drainage system, which is of an unknown design. As such, no information regarding the proposed surface water runoff location, as required by Standard 1 of the Non-Statutory Technical Standards for SuDS (NSfS), has been provided. As insufficient evidence has been submitted to demonstrate how the applicant intends to drain surface water, we are unable to assess whether the proposed development would increase flood risk. It is the

responsibility of the applicant or their drainage designer to provide this evidence. For this reason, we object to the proposal, as the submission of such evidence may affect the scale and layout of the development.

To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of one metre of unsaturated ground can be maintained between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential in Middleton are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels (suspected to be particularly high in this area of the Elmer Sands Estate), or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.

If infiltration is not viable, then alternative sustainable means of draining the site are summarised as follows:

1. Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration – not investigated.
2. To a watercourse – A main river (Elmer Rife) can be found 50m to the east.
3. To a surface water sewer – A land drain can be found to the rear of the property. Ownership unknown.
4. To a highway drainage system – A private drain can be found to the front of the property. Owned by Elmer Sands Estate.
5. To a combined sewer – none available.

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, ADC has identified a number of potential alternative discharge locations. In accordance with the drainage hierarchy, the first option to be fully explored is discharge to the main river located to the east of the site. Any discharge to this watercourse would be subject to the necessary consent being obtained from the Environment Agency.

Should discharge to the main river not prove feasible, discharge to the land drain located to the rear of the site should be investigated. Permission from the owner would be required, and it should be demonstrated that a gravity-fed solution is achievable, as the use of pumps is strongly discouraged. The hydraulic capacity of the receiving drainage system should also be assessed and evidenced where necessary.

As a subsequent option, discharge to the private drainage network operated by the Elmer Sands Estate may be considered. It is the responsibility of the drainage designer to fully investigate this option and provide clear evidence that permission to discharge has been obtained from the relevant owner. The hydraulic capacity of the system should also be assessed and demonstrated to be sufficient to accommodate the proposed discharge.

Accordingly, robust evidence should be provided demonstrating why any higher-order discharge options within the drainage hierarchy are not feasible before reliance is placed on lower-order alternatives.

Surface water must not be discharged into the foul sewer. The foul sewer is not a recognised disposal location in the Standard 1 of the NSfS. It is important to recognise that combined sewers are intentionally designed to take both foul and surface water runoff. Even if the foul sewer has the capacity to accommodate additional flows or has an element of surface water already in it, it is not considered combined.

The application site is in the Lidsey Wastewater Treatment Catchment Area. This catchment is the subject of a surface water management plan due in part to the recognised history of foul sewer flooding. The site is within a local flood risk zone identified within the surface water management plan [LFRZ_013]. The plan states that flood risk from pluvial water, groundwater and public sewers is high. It states that “hydraulic overload of the foul sewer system has been confirmed.” There has been extensive supporting material, including evidence of flooding and its mechanisms, collated under the Elmer Surface Water Management Plan [SWMP]. The Elmer SWMP gives multiple options to reduce the flood risk on the estate, the first of which is to separate surface water from the foul sewer.

2. Interception drainage

Interception features should be included within the SuDS design, as no details have been provided then we are unable to assess this information. However, 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.

- 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.

These features will not affect the scale or layout of development and as such can be secured by condition.

3. Extreme rainfall and flooding

The northern half of the site lies within Flood Zone 3b, with the remainder of the site located within Flood Zone 3. Product 4 data has not been submitted and should be obtained from the Environment Agency to identify the source and extent of the fluvial flood risk. Further guidance on the design of SuDS within areas at risk of flooding can be found at: www.arun.gov.uk/surfacewater.

The southern part of the site is also at risk of surface water flooding within the 1% AEP event. When climate change allowances are applied, a significant proportion of the site is shown to be affected by surface water flooding. This flood risk will need to be taken into account within the surface water drainage design. The proposed scheme must either accommodate additional surface water flows entering the site from elsewhere or demonstrate that no SuDS features will be located within areas at risk of surface water flooding and that existing ground levels will not be altered in a manner that would displace floodwater or increase flood risk elsewhere.

At present, no modelling or supporting evidence; 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 surface water drainage of the proposed development. Therefore, this application does not accord with the NPPF as set out above.

4. Water quality

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

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

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

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

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.

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.

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.

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]

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 07 October 2026 11:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Silvie Steiningerova
<Silvie.Steiningerova@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: M/60/26/HH

Please find the engineers response attached, 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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