

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/67/25/HH	Reviewer Reference:	ADC/KW/SB
Planning Officer:	Hebe Smith	Date of Review:	08/10/2025
//Site Name://	1 Rose Avenue Middleton-on-sea PO22 7TF		
Application Description:	Single storey side and rear extension, front porch extension and hip to gable loft conversion with front and rear dormers, following demolition of existing rear shed.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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. Infiltration at source, including permeable paving and infiltration to soakaway, is proposed. Source control features such as rainwater butts, permeable paving, and soft landscaping are also proposed. We support this approach in principle; infiltration is the highest priority in the drainage hierarchy and aligns with Standard 1 of the Non-Statutory Technical Standards for SuDS (NSfS). However, insufficient evidence has been provided to demonstrate that infiltration is a viable solution.

- 1.2. It is the responsibility of the applicant or their drainage designer to provide this evidence. Without it, we are unable to assess whether the proposed development would increase flood risk. The drainage statement acknowledges that site investigations will be required to undertake a detailed design. Nevertheless, without this information at this stage, it cannot be ensured that the proposed layout and scale of development are feasible.
- 1.3. 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-on-Sea are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.
- 1.4. Even where infiltration is viable, space is constrained on this site. This is important as the proposed development limits where an infiltration feature can be located. Soakaways must be at least 5m from buildings and highways. The block plan indicates that the building will be approximately 3.5m from the boundary at the east and west sides, and 3.245m from the boundary at the north. This would not leave sufficient space for a soakaway. Indeed, the proposed extensions may disrupt existing soakaways, which have not been assessed for the purposes of this submission. If the existing drainage of the property is disrupted and there is no space for an alternative, then flood risk will be increased.
- 1.5. The drainage statement also indicates that, should infiltration be unviable, a restricted discharge to an existing surface water outlet will be used. The only nearby piped network (aside from the public foul sewer) is a WSCC highway drain in Elmer Road, to the immediate north of the site. No evidence or permission has been provided to confirm whether discharge to the highway drainage system is permitted, or whether the drain has sufficient capacity. The applicant has not provided any further information on how they may drain the site if infiltration is later found to be unviable. For this reason, we **object** to the proposal. The submission of such evidence may also affect the scale and layout of the development.
- 1.6. If infiltration is not viable, then alternative sustainable means of draining the site are summarised as follows:
- Water reuse – proposed but will not provide a full design solution and can be secured via condition.
 - Infiltration – not fully investigated.
 - To a watercourse – none available.
 - To a surface water sewer – none available.
 - To a highway drainage system – Highway drains may be available, however, the applicant has no right of connection, and such connections are generally resisted by the asset owner.
 - To a combined sewer – none available.
- 1.7. 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.

1.8. **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.

1.9. It is demonstrated that if infiltration is later found not to be viable, then the applicant has not submitted, and we are not aware of, a compliant alternative disposal destination for surface water.

1.10. 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 northern edge of the site is within a local flood risk zone identified within the surface water management plan [LFRZ_014]. 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.” Therefore, it is important to ensure that future development does not exacerbate this problem.

2. Interception drainage

2.1. Inception to water butts, permeable paving and soft landscaping have been proposed. 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.

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. At present, no modelling or supporting evidence; such as ground investigations or drainage plans have been submitted for engineering assessment. In the absence 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

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

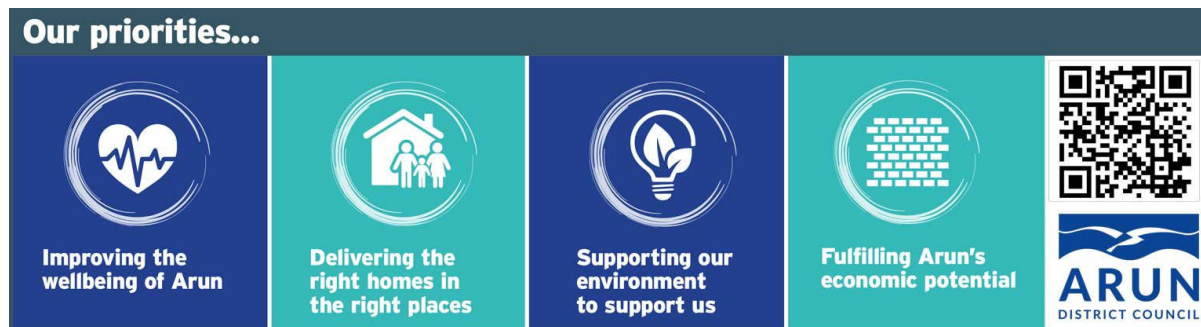
[REDACTED]

Drainage Engineers response

[REDACTED]

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



From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 08 October 2025 17:13
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: M/67/25/HH

Please find attached the consultation response from the engineers; 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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Our priorities...



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

Sent: 09 September 2025 13:04

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

Subject: Planning Consultation on: M/67/25/HH

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission for Works or Extension to a Dwelling

Application No: M/67/25/HH

Registered: 9th September 2025

Site Address: 1 Rose Avenue Middleton-on-sea PO22 7TF

Grid Reference: 497995 100198

Description of Works: Single storey side and rear extension, front porch extension and hip to gable loft conversion with front and rear dormers, following demolition of existing rear shed.

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.

Should you have any comments to make, these should be sent by replying to this email by 9th October 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.

When the appeal relates to a householder application there will be no opportunity to make further comments.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk

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