Engineers Comments Regarding Surface Water Drainage

Application Reference:	**M/93/25/HH**	**Reviewer Reference:**	ADC/KW/PC
Planning Officer:	Rhiannon Lloyd	**Date of Review:**	22/12/2025
Site Name:	26 West Close, Middleton-on-sea, PO22 7RP		
Application Description:	Single storey rear extension and first floor side and rear extensions.		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

Drainage Impact Assessment

Biodiversity Enhancement Statement

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

1.1. It is proposed that surface water runoff from the newly formed roof will be drained to a soakaway, which will be located at least 5 m away from the host building and any boundaries. It is indicated that infiltration is likely to be viable on site due to the sandy soil conditions; however, no further details or evidence of soil samples have been provided. Whilst we support this approach in principle, since infiltration is the highest priority in the drainage hierarchy and aligns with Standard 1 of the National

Standards for SuDS (NSfS); 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 applicant has also not demonstrated how they may drain the site if infiltration was later found not to be viable. For this reason, **we object to the proposal**. The submission of such evidence may also affect the scale and layout of the development.

1.3. To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of 1 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 by undertaking winter infiltration testing at the depth and location of any proposed infiltration features, providing one metre freeboard is achievable.

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

1. Water reuse – water butts proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration – not investigated.
2. To a watercourse – none available.
3. To a surface water sewer – none available according to our records.
4. To a highway drainage system –a private surface water drain can be found in the highway to the front of site.
5. To a combined sewer – none available.

1.5. 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.

1.6. **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.

1.7. There is a private surface water sewer located to the south of the property, within the highway. No information regarding this option has been submitted. If infiltration is not viable, the applicant would need to investigate the possibility of, and permission of the landowner to connect surface water to the sewer at the front of the site. The applicant would need to demonstrate that a gravity connection is achievable by providing topographical information of the site and proposed SuDS.

1.8. 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_024]. The plan states that flood risk from pluvial water, groundwater and public sewers is high. It states that the existing surface water drainage system cannot convey storm water during heavy or prolonged periods of rain because of heavy silting and root damage to the private SW drainage system. Therefore, it is important to ensure that future development does not exacerbate this problem.

2. Interception drainage

2.1. From the limited details provided, it is proposed to utilise water butts. 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.

1. Infiltration features designed to meet extreme rainfall standards.
2. Water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
3. Raingardens and bioretention features attached to all new downpipes.
4. 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 has a medium to low risk of surface water flooding at the southern most section of site. This will need to be accounted for by the surface water drainage design. The design must either account for additional surface water volume entering the site from elsewhere or ensure that no SuDS features are located in this area and that levels are not altered. For further guidance, please refer to our SuDS in Flood Areas document available online at www.arun.gov.uk/surfacewater.

3.2. 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. Permeable paving and leaf guards will be installed preventing detritus from entering the drainage system. However, 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 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]

[redacted]

[redacted]

[redacted]

[redacted]

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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 22 December 2025 13:19
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: M/93/25/HH

Please find the engineers consultation 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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