

Engineers Comments Regarding Surface Water Drainage

Application Reference:	M/98/25/HH	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Rhiannon Lloyd	Date of Review:	04/02/2025
Site Name:	1 Elmer Court, Elmer		
Application Description:	Extension and alterations to form a rear facing balcony and sliding doors (part retrospective).		
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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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:

- **None**

Consultation comments to the planning officer

0. General

- 0.1. No information has been provided on the proposed method of surface-water management. While the development proposes a balcony, which is elevated above ground level, it will result in an increase in impermeable surfacing that will require a suitable drainage solution.

1. Runoff destination

- 1.1. No discharge location is proposed. This is a requirement by Standard 1 of the Non-Statutory Technical Standards for SuDS (NSfS). 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.

- 1.2. 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 or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant. Further information regarding infiltration testing and groundwater monitoring can be found at <https://www.arun.gov.uk/surfacewater/>.
- 1.3. Given the site's proximity to the foreshore, winter groundwater monitoring should demonstrate that potential fluctuations in groundwater levels caused by spring tides have been fully considered. Evidence of this assessment must be included within the submission.
- 1.4. 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 – none available.
 3. To a surface water sewer – to highway at front of site, or to the land drain at the rear of site.
 4. To a highway drainage system – none available according to our records.
 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. In this case, ADC has identified a potential alternative; the private drainage system operated by the Elmer Sands Estate. It is the designer's responsibility to fully investigate this option, where necessary, and provide clear evidence of permission to discharge into the privately maintained system. There is also a land drain to the rear of site, permission from the owner to discharge to this location will be required and it should be ensured that a gravity lead solution was feasible as the use of pumps is highly discouraged.
- 1.7. 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

2.1. The applicant has submitted no information regarding interception. 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. The site sits in Flood Zone 3 (FZ3) and is assumed to be at risk of tidal flooding only. However, this assumption must be demonstrated by the applicant. If the site is confirmed to be at tidal risk rather than fluvial, it is likely that SuDS will be feasible. The applicant is required to provide evidence supporting this assumption. 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 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

From:

Sent:

To:

Subject:

Attachments:

Elaine Walby on behalf of Planning.Responses

13 February 2026 14:52

Planning Scanning

FW: Planning Consultation on: M/98/25/HH

M-98-25-HH 1 Elmer Court.docx

PL- Consultation- Engineers response

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

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

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

Our priorities...



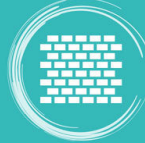
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations





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From:

Sent:

To:

Cc:

Subject:

Kathryn Welch <Kathryn.Welch@arun.gov.uk>

13 February 2026 14:41

Planning.Responses <Planning.Responses@arun.gov.uk>; Rhiannon Lloyd <Rhiannon.Lloyd@arun.gov.uk>

Paul Cann <Paul.Cann@arun.gov.uk>

RE: Planning Consultation on: M/98/25/HH

Please find attached our response to the above application; an objection.

Many thanks,

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

T: 01903 737789
E: kathryn.welch@arun.gov.uk

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



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Delivering the right homes in the right places



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 09 January 2026 15:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: M/98/25/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/98/25/HH
Registered: 6th January 2026
Site Address: 1 Elmer Court Elmer Middleton-on-sea PO22 6JT
Grid Reference: 499052 100237
Description of Works: Extension and alterations to form a rear facing balcony and sliding doors (part retrospective).

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 12th February 2026 . 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

Rhiannon Lloyd

Planning Officer- Arun District Council

Telephone: 01903 737637

Email: rhiannon.lloyd@arun.gov.uk