

Engineers Comments Regarding Surface Water Drainage

Application Reference:	CM/19/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	29/09/2026
Site Name:	Baird Business Park Grevatt's Lane Littlehampton BN17 5RE		
Application Description:	Erection of replacement commercial building, parking and other associated infrastructure, including new attenuation pond. This application is in CIL Zone 5 (Zero Rated) as other development.		
Assessment Number:	3		

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection subject to condition

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Site location plan 26972-MAC-XX-XX-DR-B-001 Rev P6
- FRA AND DRAINAGE STRATEGY
- FRA AND DRAINAGE STRATEGY PART 2
- LIDSEY DRAINAGE IMPACT ASSESSMENT
- PLANNING STATEMENT
- RIVER CONDITION ASSESSMENT REPORT OF RYEBANK RIFE TO THE SOUTH EAST OF BAIRDS BUSINESS PARK
- 13951_1250_P3 POND SECTIONS
- 13951_1600_P5 DRAINAGE STRATEGY
- 13951_1601_P1 EXCEEDANCE FLOOD FLOW ROUTING PLAN
- FRA AND DRAINAGE STRATEGY PART 1 (14/09/2026)**
- FRA AND DRAINAGE STRATEGY PART 2 (14/09/2026)**

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

Consultation comments to the planning officer

0. General

- 0.1. The application is for major development and the scheme requires sustainable drainage meeting operational standards in accordance with NPPF Policy F8.
- 0.2. The application site is close to a main river and is within Flood Zone 3 (High Risk). The Environment Agency has provided advice on flood risk from rivers and seas.
- 0.3. The surface water flood risk to the site is acceptable but the design should ensure overland flow / adjacent surface water ponding would not enter the drainage system.
- 0.4. We note the Objection from WSCC LLFA dated 8 September 2026 and the Environment Agency No Objection subject to conditions dated 31 July 2026. The LLFA should be reconsulted on the most recent information.
- 0.5. We have reviewed the revised Flood Risk Assessment dated 14/09/2026 part 1 and 2.

1. Runoff destination

- 1.1. The drainage strategy is to discharge surface water runoff to a watercourse (main river) at a restricted rate with attenuation within permeable paving and a basin.
- 1.2. There is no rainwater harvesting proposed, which is acceptable on the basis of limited demand for reuse of water.
- 1.3. The winter groundwater monitoring data has now been provided within the appended ground investigation report and is summarised as highest reading 2.9m below ground level (bgl) and lowest reading 3.9m bgl over the winter period 2025/26.
- 1.4. Infiltration testing was carried out at 1.5m below ground level and returned nil infiltration in the clayey River Terrace Deposits. Bearing the groundwater levels and local geology in mind this is sufficient to evidence the need to discharge to a watercourse. The runoff destination is therefore acceptable. Partial albeit very low infiltration could be considered at technical design stage.
- 1.5. Note – two trees are shown to be removed to facilitate the drainage route to the outfall and the tree Officer should be consulted.

2. Interception drainage

- 2.1. The winter groundwater monitoring data is now provided with the appended ground investigation report and is summarised as highest reading 2.9m below ground level lowest reading 3.9m bgl. The groundwater monitoring data / results is now included in the appendix.
- 2.2. The infiltration testing also returned nil infiltration and therefore the unlined permeable paving would only be valid for twice the self-drained area.
- 2.3. A swale noted in the report is clarified as the base of the attenuation basin and the liner depth in the section provides the required 500mm substrate which allow for five times the area when lined.
- 2.4. Calculations provided within the report text show the total area served by interception drainage to be 2,370 sqm out of a newly drained impermeable area of 3,140 sqm. Therefore the design does not provide interception drainage for the development.

2.5. Interception drainage is not in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. Greenfield runoff calculations are included and the design peak flow rate is based upon pro-rata of 3l/s/ha for the drained area in accordance with the NSfS.
- 3.2. A drained areas plan is provided which shows 3,140 sqm drained to the basin and a further 3,940 sqm continuing to drain as existing. The areas of new proposed access road are included. The existing access road appears to fall away from the proposed works such that it would not drain via the new drainage system other than the areas included.
- 3.3. The proposed basin is in a location of existing surface water flood risk. The fluvial flood risk is low in the defended model for the present day. The with climate change fluvial only risk outline is not shown and may or may not affect the basin location.
- 3.4. An assessment of the with climate change surface water flood risk is included and the basin is designed to have a lip at top of bank to keep surface water out of the drainage system.
- 3.5. The displaced pluvial flood water is not quantified / modelled and whilst there is indication in the form of an existing culvert that the true extent of flood risk may be reduced from the national mapping, it is not evidenced. The potential volume of displaced water based upon the national depth mapping for the with climate change scenario should be assessed and mitigated. This analysis can also assist in confirming the basin would not receive flood water over the banks. The Arun DC guidance exceptions are noted in the report which states that 'where an area of surface water flood risk can be evidenced to only receive flow from within the site boundaries' SuDS are permitted in the flood risk area. The catchment of this surface water flood risk could be defined based upon topography to check whether this applies to the basin. Consideration could also be given to relocating the basin outside of the flood risk area.
- 3.6. The proposed surcharged outlet basis and level is appropriate. The surcharge is shown in the hydraulic calculations and is acceptable.
- 3.7. Management of extreme rainfall is not currently demonstrated to be in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. Water quality is provided by the permeable paving and basin, which is acceptable in accordance with current standards and guidance on treatment of surface water runoff.

5. Amenity

- 5.1. The development is redevelopment of a brownfield site and opportunities for amenity are limited. The design includes appropriately designed surface level features and permeable paving, which is acceptable.

6. Biodiversity

- 6.1. The development is redevelopment of a brownfield site and opportunities for increasing biodiversity are limited. Biodiversity is enhanced by the creation of the proposed basin, which includes areas of permanent pond.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. There are no significant concerns about the construction and operation of the scheme. Blockage protection will need to be incorporated into the technical design.

7.2. An outline maintenance and operation plan is incorporated within the drainage report. The drainage system will be within a single ownership.

7.3. A detailed Management and Maintenance Plan can be conditioned as part of the technical design and assessment to be submitted at approval of details stage.

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

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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 06 October 2026 14:26
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: CM/19/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 21 September 2026 11:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: CM/19/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: CM/19/26/PL
Registered: 9th July 2026
Site Address: Baird Business Park Grevatt's Lane Littlehampton BN17 5RE

Grid Reference: 499295 101381
Category: Plan Applicat'n
Description of Works: Erection of replacement commercial building, parking and other associated infrastructure, including new attenuation pond.
This application is in CIL Zone 5 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 15th September 2026 relating to:- Flood risk and drainage strategy

If you should wish to make further representations as a result of this amendment, please make any further comment by **16th September 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Kathryn Welch

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PLRECON (ODB) 2018