

Engineers Comments Regarding Surface Water Drainage

Application Reference:	CM/04/26/PL	Reviewer Reference:	EXT02/101
Planning Officer:	Hebe Smith	Date of Review:	23/04/2026
Site Name:	Rigates Climping Street Climping BN17 5RQ		
Application Description:	Subdivision of an existing dwelling to create two semi-detached dwellings, construction of a new access, two residential garages and associated infrastructure. This application is in CIL Zone 3 and may affect the setting of listed buildings.		
Assessment Number:	1 of 2		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	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:

- EXISTING SITE PLAN DPA-002
- PROPOSED SITE PLAN DPA-003
- DWELLING 01 PROPOSED GARAGE DPA-007
- DWELLING 02 PROPOSED GARAGE DPA-008
- JULIAN MUNN CCTV SURVEYS
- SURFACE WATER DRAINAGE STATEMENT
- FRA AND DRAINAGE STRATEGY
- LIDSEY DRAINAGE STATEMENT
- SUPPLEMENTARY GROUND INVESTIGATION REPORT REF:UK25.7445B
- BIODIVERSITY NET GAIN ASSESSMENT

Consultation comments to the planning officer

0. General

Whilst some information has been submitted that shows compliance with some parts of the 7 Standards, it is not comprehensive enough to demonstrate full compliance.

1. Runoff destination

- 1.1. It is accepted that infiltration methods of drainage are not likely to be suitable due to the depth of the groundwater in the winter.
- 1.2. The surface water drainage strategy includes a new connection to the existing public surface water sewer at a restricted rate. No evidence has been supplied to confirm that the existing public surface water sewer has capacity to accept the additional flow.
- 1.3. Additionally, there does not appear to be any assessment that the proposed development can drain by gravity to the existing public sewer (it is noted that limited information regarding the public surface water sewer is included in the public sewer records).

2. Interception drainage

- 2.1. The submitted documents do not appear to include a dedicated commentary regarding interception drainage.
- 2.2. Water reuse is discussed in the strategy, but the emphasis is on reducing demand for potable water rather than providing a drainage advantage.
- 2.3. The strategy includes the installation of downpipe/SuDS planters, and it is stated that this will reduce the volume of run off discharged. This statement should be evidenced.
- 2.4. The inclusion of permeable paving when it drains its own catchment is considered to provide an adequate level of interception, further interception measures may be required for the roof run-off, if evidence of evapotranspiration cannot be provided for the downpipe/SuDS planters.

3. Extreme rainfall and flooding

- 3.1. In principle, the method used in the calculations is accepted, the FEH rainfall data file should be emailed to land.drainage@arun.gov.uk
- 3.2. A catchment plan should be provided which can be cross referenced to the calculations and including how urban creep has been applied.
- 3.3. There does not appear to be an assessment of predevelopment or postdevelopment overland/exceedance flow rates.
- 3.4. There does not appear to be an allowance for surcharging of the outfall
- 3.5. There does not appear to be an assessment of the impact that a flood event would have on the proposed surface water drainage system.

4. Water quality

- 4.1. No information has been submitted. Arun District Council guidance suggests that a simple index-based approach, as prescribed in the SuDS manual, is appropriate in most instances.

5. Amenity

- 5.1. No information has been submitted. The applicant may wish to assess if the small site exception would apply in this instance.

6. Biodiversity

- 6.1. The provision of downpipe/SuDS planters is acknowledged but no assessment of these is included in the biodiversity report.

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

7.1. No comments

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.

8.4. In order to overcome the objection, the applicant should submit information demonstrating how the 7 standards above have been addressed or the justification for departures.

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

PL- Consultation- Engineers response



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...



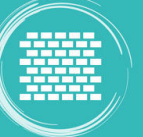
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 28 April 2026 12:25
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: CM/4/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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



Our priorities...



Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 08 April 2026 14:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: CM/4/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

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

Planning Permission

Application No:	CM/4/26/PL
Registered:	18th March 2026
Site Address:	Rigates Climping Street Climping BN17 5RQ
Grid Reference:	500140 101531
Description of Works:	Subdivision of an existing dwelling to create two semi-detached dwellings, construction of a new access, two residential garages and associated infrastructure. This application is in CIL Zone 3 and may affect the setting of listed buildings.

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.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 30th April 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.

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

Telephone: 01903 737626

Email: hebe.smith@arun.gov.uk