

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/141/25/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Miss K Welch	Date of Review:	17/11/2025
Site Name:	57 River Road Littlehampton BN17 5DD		
Application Description:	Partial demolition of number 57 River Road, change of use & re-development to provide a flatted development comprising 9 No. apartments with private amenity space, parking & cycle storage, including the partial demolition of the adjacent boundary wall to provide a new pedestrian access & the creation of a floating pontoon with resident morning spaces (resubmission following LU/251/21/PL). This application affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats.		
Assessment Number:	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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	Insufficient	Objection

Reviewed Plans

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

- Drainage Assessment dated February 2025
- Flood Risk Assessment dated February 2025
- Proposed Site Plan A_090 rev P01
- Proposed Upper GF Plan A_101 rev P01

Consultation comments to the planning officer

0. General

- 0.1. Please note the site address is incorrectly stated on the application form and should be 47 River Road. The address is therefore incorrect on the planning application file site description.
- 0.2. Due to the location of the scheme adjacent to a main river, infiltration techniques will not be suitable and no infiltration testing or winter groundwater monitoring is required.
- 0.3. We note the Objection from the Environment Agency dated 5 September 2025 which necessitates alteration to the Flood Risk Assessment and building design due to tidal flood risk.
- 0.4. The site is located within Flood Zone 3 (High Risk) present day and future year. A Sequential Test and Exception Test should be required for residential development. The Environment Agency will

advise whether the design of the development is safe for the lifespan of the development and the Planning Authority must determine whether there are any suitable sites at lower flood risk zone classification and whether there are wider sustainability benefits to the community that outweigh the flood risk.

1. Runoff destination

- 1.1. The applicant proposes to discharge surface water part to a combined sewer and part to the River Arun watercourse. Water reuse is not proposed but should be in accordance with the hierarchy for sustainable drainage. There is relatively small contributing catchment but there may be potential demand for non-potable water, there may also be a need for small scale landscape irrigation.
- 1.2. The drainage assessment states that the existing site discharges to the River Arun but the proposed development discharges part to the public sewer. This is not in accordance with the drainage hierarchy which states runoff destinations should be to watercourses before sewers. Evidence has not been provided that the higher priority destination has been utilised to the maximum effect practicable. Note – It is accepted that infiltration is not suitable in this location.
- 1.3. The runoff destination is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.
- 1.4. Please note if evidence is provided that connection to the sewer is necessary, further details of the location and depth of the sewer will be required to demonstrate connection is feasible with discharge by gravity without the need for mechanical pumping. Drainage capacity checks will also be required and comment from Southern Water that the connection is acceptable should be provided.

2. Interception drainage

- 2.1. The opportunities for interception drainage include lined permeable paving and green roofs or walls, or other method to be proposed by the applicant. The drainage assessment states that there is no external paved area available to locate permeable paving but this does not appear to be the case from the submitted plans as there is a ground floor level car park.
- 2.2. Evidence has not been provided to justify the lack of interception drainage provided as part of the sustainable drainage design. Inception drainage is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.
- 2.3. Please note, consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development.
- 2.4. Where infiltration is not viable, there is a risk that interception drainage may only be delivered by evapotranspiration. No SuDS features which allow evapotranspiration are proposed. There may be a case for reduced reliance on interception drainage for an unrestricted outlet to a tidal estuary, however no departure from the national standards from SuDS has been requested. It is unclear where interception features may be included within the proposed scale and layout.

3. Extreme rainfall and flooding

- 3.1. The drainage strategy is to attenuate large return period storms within a below ground storage tank with a restricted outlet to a sewer for the roof area, and the external areas to discharge to the River Arun without restriction.
- 3.2. The design shown in the drainage assessment is a concept level mark-up of the site plan and not an engineering design with sufficient information for full planning stage.
- 3.3. There are a number of deficiencies in the drainage calculations when reviewed against current SuDS standards and guidance and the Arun DC drainage checklist, set out below.
- 3.4. The CV values are set to 0.95 and should be 1.0.

- 3.5. The rainfall profiles are not in accordance with best practice and should utilise the latest FEH point data.
- 3.6. The climate change allowance is incorrectly stated as 40% for the design storm. The allowance should be 40% for the 3.3% AEP storm and 45% for the 1% AEP design storm.
- 3.7. The combined peak discharge rate is not clarified in the drainage assessment. This should be as close as reasonably practicable to greenfield runoff for a previously developed site. The combined / total outflow from the drained areas should be assessed.
- 3.8. The drainage strategy plan states the flow control is 1.7 litres per second, whereas the 100 year greenfield runoff rate for the site is stated as 0.29 litres per second. It is our view that the development proposals and assessment has not demonstrated that the sustainable drainage system cannot achieve close to greenfield runoff rates. A relaxation factor can be agreed in accordance with the NSfS (para 3.21) which should be no greater than 5 times GFR for the 50% AEP and 1% AEP storms. However, the development may be able to achieve rates of 0.5 - 1.0 litres per second depending on the design solution. The design should then incorporate measures to reduce the risk of blockage of the flow control device. Please note the requirement for flow control would not apply to direct discharges to the tidal main river, see below.
- 3.9. The NSfS permits unrestricted discharge to large tidal estuaries and the sea as development runoff cannot significantly affect water levels.
- 3.10. The River Arun is tidal at this location and therefore not considered to be a sensitive receptor. In some cases, it may be possible to discharge surface water at an unrestricted rate. The Environment Agency (EA) is the risk management authority for the Arun as it is a designated Main River. No evidence has been submitted to demonstrate that the proposed discharge rates, volumes or flow parameters have been agreed with them. This is an expectation of the NSfS. A flood risk activity permit will also be required from the EA.
- 3.11. If unrestricted discharge is permitted, storage is required where there is a risk that the system could be tidally locked and attenuation may be required to storm water without flooding. The downstream surcharge should be based upon the Mean Highwater Spring Tide.
- 3.12. Careful consideration will be needed of how to protect that storage from tidal/fluviial flooding. There is guidance on the Arun DC webpages regarding SuDS in Flood Areas. The application needs to consider the possibility of floodwater entering attenuation.
- 3.13. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. No mitigation or specific design is proposed for water quality. No assessment is provided on the mitigation of water quality for the sustainable drainage system.
- 4.2. Water quality mitigation should meet minimum standards such as the SuDS Manual Simple Index Approach or equivalent assessment.
- 4.3. It is possible but currently unclear whether the design of pollution control could be achieved below ground without affecting scale and layout.
- 4.4. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 4). Therefore, we **object** to the application.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.

- 5.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 5.4. Amenity is not currently in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.

6. Biodiversity

- 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
- 6.4. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

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

- 7.1. An outline maintenance and operation plan is incorporated within the drainage assessment. This will need to be updated if the design changes and incorporate information on ownership and management responsibilities.
- 7.2. The outline plan does not currently include information on flooding and remediation or clean up following a flood. This aspect should be added to the plan.
- 7.3. A detailed Management and Maintenance Plan can then 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

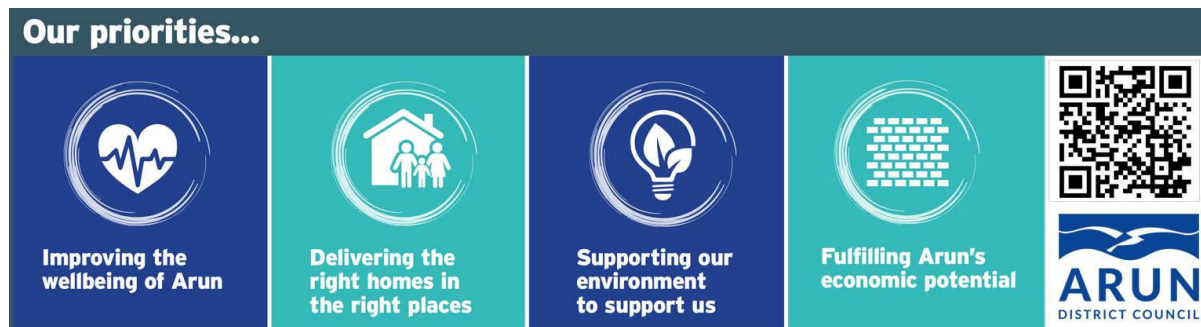
[REDACTED]

Drainage Engineers response

[REDACTED]

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

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



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 20 November 2025 10:15
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Kathryn Welch <Kathryn.Welch@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/141/25/PL

Hi Kathryn,

Find the consultation response – an objection – attached.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

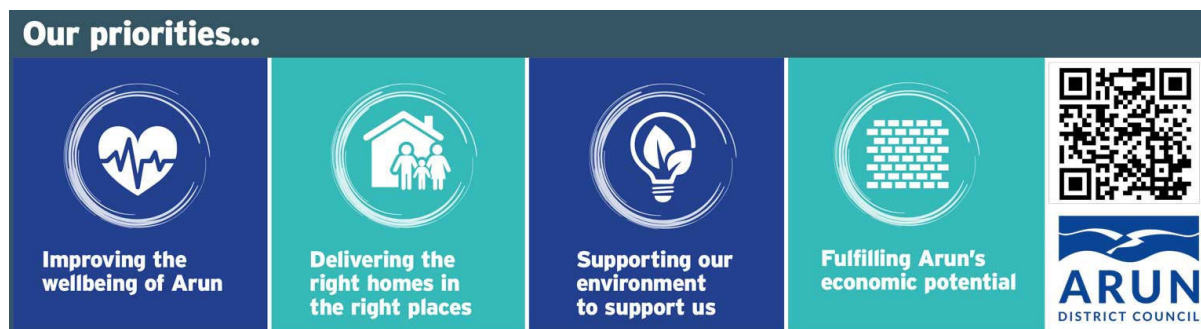
Kind regards

Sarah Burrow
Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737815

E: sarah.burrow@arun.gov.uk

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



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

Sent: 19 August 2025 17:49

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

Subject: Planning Consultation on: LU/141/25/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: LU/141/25/PL
Registered: 15th August 2025
Site Address: 57 River Road Littlehampton BN17 5DD
Grid Reference: 502356 102130
Description of Works: Partial demolition of number 57 River Road, change of use & re-development to provide a flatted development comprising 9 No apartments with private

amenity space, parking & cycle storage, including the partial demolition of the adjacent boundary wall to provide a new pedestrian access & the creation of a floating pontoon with resident morning spaces (resubmission following LU/251/21/PL). This application affects the character & appearance of the Littlehampton River Road Conservation Area & is in CIL Zone 4 (Zero Rated) as flats.

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 18th September 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.

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

Yours sincerely

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLCONSULT (ODB) 2020