

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                            |                            |                   |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------------|
| <b>Application Reference:</b>   | <b>LU/193/25/PL</b>                                                                                                                                                                        | <b>Reviewer Reference:</b> | ADC/EXT2/D2134/86 |
| <b>Planning Officer:</b>        | Harry Chalk                                                                                                                                                                                | <b>Date of Review:</b>     | 05.03.2026        |
| <b>Site Name:</b>               | Court Wick Park Courtwick Lane Littlehampton BN17 7PD                                                                                                                                      |                            |                   |
| <b>Application Description:</b> | Proposed residential development for 4 houses and associated landscaping. This application may affect the setting of a Listed Building and is in CIL Zone 2 (CIL liable as new dwellings). |                            |                   |
| <b>Assessment Number:</b>       | 1 of 2                                                                                                                                                                                     |                            |                   |

| Policy and Guidance Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
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| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |  |

| Response | Objection / No objection |
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| References                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p> |

## 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    | <b>No objection subject to conditions</b> |
| 2. Interception drainage                                                          | Compliant    | <b>No objection subject to conditions</b> |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient | <b>Objection</b>                          |
| 4. Water Quality                                                                  | Compliant    | <b>No objection subject to conditions</b> |
| 5. Amenity                                                                        | Compliant    | <b>No objection subject to conditions</b> |
| 6. Biodiversity                                                                   | Compliant    | <b>No objection subject to conditions</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient | <b>Objection</b>                          |

## Reviewed Plans

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

- Drainage Strategy Sheet 1 P9
- EMAIL 12.2.26 subplans
- EMAIL 3.12.25 subplans
- H2070- ADG- ZZ- XX- DR- A-9012 - Proposed Site Plan - Boundary Plots
- EMAIL 8.12.25 sub plan
- Plot 1 & 2 Soakaway
- Plot 3 Soakaway
- Plot 4 Soakaway
- Overland Flood Flow Path P2
- Flood risk assessment and drainage strategy
- Proposed Site Plan Rev L
- Plot 1&2 plans and elevations Rev D
- Plot 3 Plans and elevations Rev C
- Plot 4 Plans and elevations Rev 4
- Hard and soft landscape - general arrangement plan 100 02
- Location plan 9001

## Consultation comments to the planning officer

### 0. General

With reference to our earlier drainer consultation response dated, 12.12.2025n the applicant does not appear to have submitted a response to address each comment raised. We suggest you provide a formal response in a tracker. In light of this the majority of comments have been reiterated as below:

- 0.1. As cited before the National Standards now apply, therefore it is prudent that the FRA report is updated to align with the following sections or an addendum.
- 0.2. The flood risk report, refers to geotechnical investigation undertaken by Albury SI Ltd dated Feb 2025, however full information has not been supplied to include full winter groundwater monitoring results, trial hole logs and material testing data/summaries.
- 0.3. The flood risk report, item 2.5 advises made ground on site at depths of 400-700mm. These plume areas must be identified on the layout plans and may preclude the use of infiltration features unless suitably mitigated.
- 0.4. The flood risk report, item 2.5 advises a chalk strata is low risk of dissolution, however does not confirm the minimum distances for structures i.e. are SUDS distances greater than 5m required?
- 0.5. There is insufficient evidence of testing depths to conclude if geocellular soakaways & shallower permeable pavements penetrate the suitable drainable strata.
- 0.6. 3 No infiltration test pits have been undertaken in compliance with BRE365 The results advised indicate significant differences across the site, however the designer has not suitably justified why the worst case rates have not been used for all soakaway locations.
- 0.7. In addition the design has not qualified the safety factor (f) consequence of failure. A safety factor of 2 currently specified on the hydraulic calculations is not in accordance with CIRIA.
- 0.8. The use of permeable pavements is highlighted on the drainage GA key, however is not shown on the plan. The extent, specification and calculations must be provided.
- 0.9. The second application now includes updated soakaway calculations for the 100yr return period, however these cannot be accepted without the above comments being addressed.

### 1. Runoff destination

- 1.1. It is evident geotechnical testing confirms infiltration to be viable. The designer has proposed soakaways to discharge run-off to the ground, adhering to national standards, priority 2 infiltrated to ground.

### 2. Interception drainage

- 2.1. The designer has proposed soakaways to discharge run-off to the ground, therefore intercepting the first 5mm of rainfall with no run-off leaving the site.

### 3. Extreme rainfall and flooding

- 3.1. The drainage design does not comply where the design is for a 10yr return period. This must cater for the 100yr return period, plus climate change and urban creep factors. It must also demonstrate the 50% half drain down time lies within 24hrs for the 30yr event.

3.2. The design drawings must highlight the extents for the risk of surface water flooding where this may impact on the current location of dwellings. Whilst some mitigation of ensuring a 300mm elevation is proposed, pre-development and post completion exceedance routing must be evidenced to ensure the proposals are suitable for the lifetime of the development. This must include evidence of the risk of surface water flooding catchment where this may convey run-off on/off the site, and consider flood depths and drain down durations.

3.3. The second applicant has provide pre-development and post- development exceedance overland flow drawings denoting the plume risk areas. Whilst noting run-off would also drain to ground, there is no change in local catchment leaving the site and no proposed buildings shown to be at risk, therefore this information is acceptable.

#### 4. Water quality

4.1. Run off from roofs are conveyed to soakaways via silt traps. All other areas are collected via permeable pavements subject to review of additional information requested. On this basis water quality measure are acceptable.

#### 5. Amenity

5.1. No assessment of amenity benefit has been submitted. The minor scale of the development and proposed surface water strategy are expected to reduce flood risk and provide suitable water quality via permeable pavements. The designer shall provide a summary.

#### 6. Biodiversity

6.1. No assessment or statement regarding SuDS biodiversity has been submitted. The minor scale of the development and proposed surface water strategy are expected to reduce flood risk and provide suitable water quality via permeable pavements, and filter pollutants. The designer shall provide a summary.

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

7.1. There is the potential for conflict between proposed trees and drainage infrastructure on the site. As landscaping is to be determined by this application it is expected that these conflicts are resolved.

7.2. Whilst maintenance is briefly discussed 4.6, the designer must provide a maintenance schedule and/or summary as per ADC requirements.

#### 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

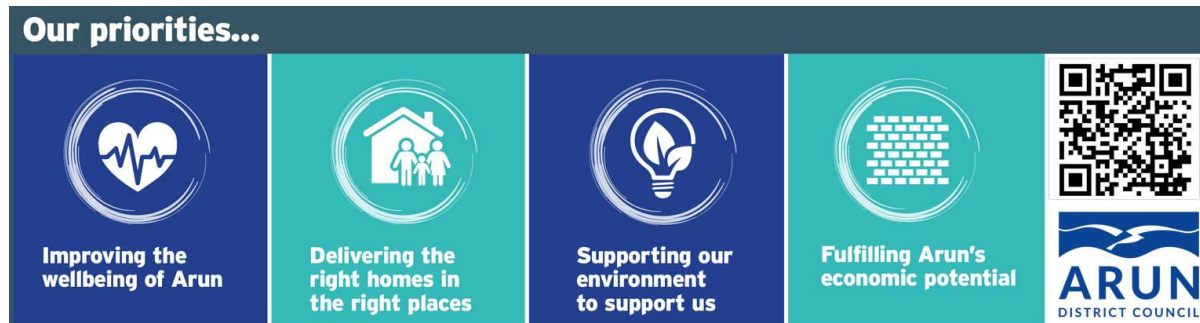
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**From:** Paul Cann <Paul.Cann@arun.gov.uk>  
**Sent:** 11 March 2026 11:23  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: LU/193/25/PL

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 18 February 2026 09:34  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: LU/193/25/PL

To: **Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

### TOWN AND COUNTRY PLANNING ACT 1990

**Application No:** LU/193/25/PL  
**Registered:** 26th September 2025  
**Site Address:** Court Wick Park Courtwick Lane Littlehampton BN17 7PD  
**Grid Reference:** 501910 103745  
**Category:** Plan Applicat'n  
**Description of Works:** Proposed residential development for 4 houses and associated landscaping. This application may affect the setting of a Listed Building and is in CIL Zone 2 (CIL liable as new dwellings).

I am able to inform you that I have received an amendment to the above application dated 12th February 2026 relating to:- Substitute drainage strategy and additional calcs

If you should wish to make further representations as a result of this amendment, please make any further comment by **5th March 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

Harry Chalk

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