

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/207/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	05/10/2026
Site Name:	Burger King Restaurant Worthing Road Littlehampton BN17 6LE		
Application Description:	Installation of a drive-through lane to serve the existing Burger King restaurant. This application affects a Public Right of Way. Is in CIL Zone 4 (Zero Rated) as other development.		
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 (Chapter 18). 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further Information
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	Further Information

Reviewed Plans

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

-Flood Risk Assessment and Drainage Strategy

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 development includes no new buildings or occupants but the infrastructure is within a future flood risk zone. The Environment Agency will provide advice on flood risk from rivers and seas.
- 0.2. The works are on the edge of the future year surface water flood extent and the modelling epoch extends beyond the design life of the development. We do not object to the development on external flood risk grounds in terms of risk to the development.

1. Runoff destination

- 1.1. There is limited demand for water reuse within the development site and water collection for reuse is not required.
- 1.2. Infiltration to ground has been discounted in the report based upon general knowledge of the area. It is correct that high groundwater often precludes infiltration solutions. However, some evidence relating localised ground levels to groundwater data should be provided in support of this design decision.
- 1.3. The proposed connection to the watercourse would be acceptable in principle if infiltration is not feasible. The feasibility of this solution should be demonstrated with finished ground levels and below ground drainage levels against topographic survey which includes the watercourse.
- 1.4. The downstream connectivity of the watercourse with the wider land drainage network should also be established.
- 1.5. Once the outfall to the watercourse is confirmed to be feasible it may be possible to require further ground investigation as a condition of planning consent.
- 1.6. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 1). The current submission does not demonstrate compliance with the standard, therefore, we **Object** to the development.

2. Interception drainage

- 2.1. The calculations for interception drainage are not in accordance with guidance within Standard 2 of the NSfS. The combination of the swale and basin might provide the necessary areas. The calculations should be revised to accord with the NSfS.

3. Extreme rainfall and flooding

- 3.1. A drained areas plan should be provided highlighting a hatched area of impermeable runoff. The calculations should also include bodies of water such as swales and basins where rainfall on these areas increases runoff to the drainage system.
- 3.2. The design peak flow of 0.9 litres per second does not comply with the requirements of Standard 3 and should be based upon the greenfield runoff rate for the drained area. A 'relaxation factor' no greater than 5 times the greenfield runoff rate may be applied where evidence is provided that demonstrates why greenfield runoff or 3 l/s/ha rates cannot be achieved. Rates as low as 0.2 litres per second are sometimes achievable with correct blockage mitigation by filtering the runoff prior to reaching the flow control.
- 3.3. The selected climate change allowance is incorrect, the NSfS confirms the upper end allowance should be used.
- 3.4. The national surface water modelling indicates flooding of the receiving watercourse. The outlet will therefore be flood-locked during the design storm. An outlet surcharge to model the downstream condition should be included in the drainage model.

- 3.5. The drainage layout should include sufficient finished ground and below ground drainage levels information to demonstrate feasibility subject to technical design. This should be based upon topographic survey.
- 3.6. The existing drainage for the drainage areas within the red line boundary which are not served by the new drainage system should be highlighted. Any areas of existing paving which drain into the new drainage system should be included in the calculated drained area.
- 3.7. Exceedance paths should be shown on the drainage layout plan.
- 3.8. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3). The current submission does not demonstrate compliance with the standard, therefore, we **Object** to the development.

4. Water quality

- 4.1. The proposed swale and basin provide adequate surface water runoff pollution treatment prior to discharge to the watercourse or via infiltration to ground.

5. Amenity

- 5.1. The proposed swale and basin provide amenity value delivered through the drainage system proportionate to the nature and scale of the development and is therefore acceptable.

6. Biodiversity

- 6.1. The proposed swale and basin provide biodiversity enhancement delivered through the drainage system proportionate to the nature and scale of the development and is therefore acceptable.

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

- 7.1. There are no concerns about the construction and structural integrity of the current drainage strategy. This will need to be reviewed if the strategy changes.
- 7.2. The development would be under a single ownership and management responsibility. A general maintenance plan is submitted with the application and may need to be updated with further details of the drainage system and to comply with Arun DC guidance. A sustainable drainage Maintenance Plan can be the subject of a planning condition.

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

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>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 06 October 2026 08:35
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: LU/207/26/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 September 2026 13:49
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/207/26/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: LU/207/26/PL

Registered: 8th September 2026
Site Address: Burger King Restaurant Worthing Road Littlehampton BN17 6LE
Grid Reference: 503914 103396
Description of Works: Installation of a drive-through lane to serve the existing Burger King restaurant. This application affects a Public Rights of Way. Is in CIL Zone 4 (Zero Rated) as other development.

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 8th October 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

PLCONSULT (ODB) 2020