

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/266/25/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	15/01/2025
Site Name:	Ambulance Station East Street Littlehampton BN17 6AU		
Application Description:	Approval of details reserved by condition imposed under LU/45/24/PL relating to condition 18-surface water drainage.		
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	Condition 18: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

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	N/A	

Reviewed Plans

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

- DRAINAGE LAYOUT AND DETAILS 25196/01 REVP1
- PLAN
- INFILTRATION TEST SPEC
- INFILTRATION TEST SPEC
- DRAIANGE REPORT

Condition wording

Condition 18 is worded as follows:

"Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local

Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council and are an overriding factor in terms of requirements. Winter groundwater monitoring to establish highest annual ground water levels and winter percolation testing to BRE 365, or similar approved, will be required to support the design of any infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a precommencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.

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

Application Reference: LU/266/25/DOC Site Name: Ambulance Station East Street Littlehampton BN17 6AU	Initial Issue Date: 15/01/2025 Issue Date: 15/01/2025 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 18: **Objection**

Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

	ADC Drainage Comments	Designer Response			
Date:	15/01/2025				
Condition Number: 18					
Comment Number					
1.	Confirmation of approval to connect to the combined sewer is required.				
2.	A full technical design should be provided to discharge conditions please provide levels design and details for pavements.				
3.	The proposed peak flow noted on the drainage plan has increased from the planning stage submission from 0.6l/s to 1.0l/s. Design peak flow should be based upon the per hectare GFR rates converted to a litre per second rate based upon the drained impermeable area.				
4.	The drainage calculations are based upon the Flood Studies Report and do not use the most up to date FEH rainfall data.				

5.	The proposed flow control device has a small orifice and could be susceptible to blockage as there are currently upstream inputs not filtered through the permeable paving. The mesh grill is noted and we would also wish to see a high level overflow to prevent flooding in the event of blockage. Consideration should also be given to filtering rainwater from roof areas prior to discharge.				
6.	The rain gardens and filter drains included at planning stage are removed and should be reinstated or design changes justified. The roof drainage could also potentially be filtered through the permeable pavement foundation.				
7.	The drainage plan should confirm the base level and any base gradients within the porous attenuation foundation.				
8.	The technical design should be supported by drainage calculations which analyse the system as a network including pipes, attenuation, flow control and outlet.				
9.	Water butts shown at planning stage are missing from the design.				

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

PL-Consultation- Engineers response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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<https://www1.arun.gov.uk/planning-application-finder>

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 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	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 16 January 2026 13:45
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: LU/266/25/DOC

Please find enclosed our consultants response, an objection.

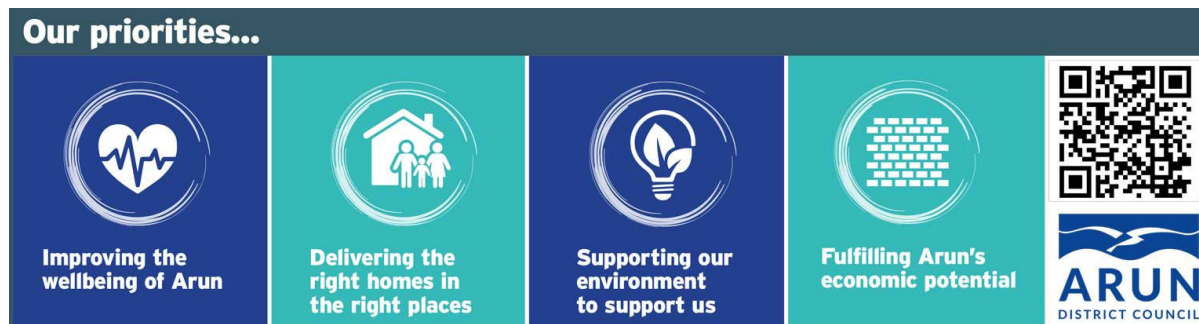
Regards

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

Sent: 05 January 2026 10:34

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

Subject: Planning Consultation on: LU/266/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LU/266/25/DOC

Registered: 2nd January 2026

Site Address: Ambulance Station East Street Littlehampton BN17 6AU

Description of Works: Approval of details reserved by condition imposed under LU/45/24/PL relating to condition 18-surface water drainage.

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **19th January 2026**.

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.

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

Yours sincerely

Kathryn Welch

Planning Case Officer- Arun District Council

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PLCONDOC (ODB) 2020