

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/29/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	05/03/2026
Site Name:	25 River Road Littlehampton BN17 5BZ		
Application Description:	Demolition of existing garage/offices with associated hard standing and construction of 2 No residential building comprising of 3 No one bedroom houses and 1 No two bedroom house. This application affects the character and appearance of the Littlehampton (River Road) Conservation Area and is in CIL Zone 4 and is CIL Liable as new dwellings.		
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
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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:

- EXISTING LOCATION PLAN 2024.423.01
- PROPOSED SITE PLAN, FLOOR PLANS AND ROOF PLANS 2024.423.03
- PROPOSED ELEVATIONS 2024.423.04
- PROPOSED BLOCK PLAN 2024.423.02
- FRA feb 26
- Proposed Sections and floor levels 2024.423.05

Consultation comments to the planning officer

0. General

- 0.1. The development is non-major development and will affect drainage on the site and therefore in accordance with Paragraph 182 of the NPPF sustainable drainage is required.
- 0.2. No Drainage Statement has been submitted in support of the application. A Flood Risk Assessment has been submitted which includes a section on sustainable drainage but does not propose a strategy or design with calculations. A Sustainable Drainage Statement should be provided to support the application. Guidance is available on Arun DC webpages - <https://www.arun.gov.uk/suds-general-design-guidance/>

0.3. The site is within Flood Zone 3 and is at risk of flooding from the River Arun. The Environment Agency should be consulted for advice on flood risk from rivers and seas.

1. Runoff destination

- 1.1. The proposed runoff destination is not confirmed in the submission and requires a drainage strategy in accordance with the NSfS.
- 1.2. The runoff destination is not currently in accordance with the requirements of the NSfS (Standard 1). Therefore, we **object** to the application.

2. Interception drainage

- 2.1. A design for interception drainage has not been provided.
- 2.2. Inception drainage is not currently in accordance with the requirements of the NSfS (Standard 2). Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. Design and calculations for extreme rainfall have not been provided.
- 3.2. The design for management of extreme rainfall is not currently in accordance with the requirements of the NSfS (Standard 3). 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.
- 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. A sustainable drainage design has not been provided.
 - 7.2. A Management and Maintenance plan should be provided with the sustainable drainage design.
 - 7.3. The design and maintenance plan is not currently in accordance with the requirements of the NSfS (Standard 7). Therefore, we **object** to the application.
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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- 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>

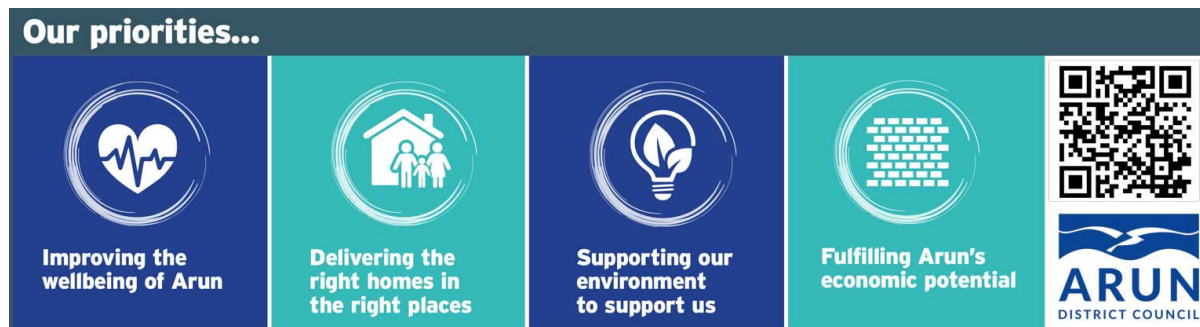
To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: RE: Planning Consultation on: LU/29/26/PL

Regards

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

E: paul.cann@arun.gov.uk



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

Sent: 09 February 2026 13:48

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

Subject: Planning Consultation on: LU/29/26/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/29/26/PL

Registered: 6th February 2026

Site Address: 25 River Road Littlehampton BN17 5BZ

Grid Reference: 502487 102072

Description of Works: Demolition of existing garage/offices with associated hard standing and construction of 2 No residential building comprising of 3 No one bedroom houses and 1 No two bedroom house. This application affects the character and appearance of the Littlehampton (River Road) Conservation Area and is in CIL Zone 4 and is CIL Liable as new dwellings.

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 12th March 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

Kathryn Welch

Planning Officer- Arun District Council

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Email: kathryn.welch@arun.gov.uk

PLCONSULT (ODB) 2020