

Engineers Comments Regarding Surface Water Drainage

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|---------------------------------|---|----------------------------|-------------------|
| Application Reference: | LU/93/25/PL | Reviewer Reference: | ADC/EXT2/D2134/75 |
| Planning Officer: | Emma Sheppard | Date of Review: | 09.12.2025 |
| Site Name: | Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS | | |
| Application Description: | Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. This application is in CIL Zone 2 and is CIL Liable. | | |
| Assessment Number: | 1 of 2 | | |

| Policy and Guidance Information |
|---|
| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater</p> <p>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/</p> <p>Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/</p> <p>Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions</p> <p>The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</p> <p>The SuDs Manual [C753] by CIRIA</p> |

| Response | Objection |
|----------|-----------|
| | |

| References |
|---|
| <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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 | No objection subject to conditions |
| 2. Interception drainage | Insufficient | Objection |
| 3. Extreme Rainfall and Flooding | Insufficient | Objection |
| 4. Water Quality | Compliant | No objection subject to conditions |
| 5. Amenity | Compliant | No objection subject to conditions |
| 6. Biodiversity | Compliant | No objection subject to conditions |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Compliant | No objection subject to conditions |

Reviewed Plans

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

- Drainage Engineers response
- FLOOD AND DRAINAGE ASSESSMENT
- GREEN INFRASTRUCTURE STRATEGY 12641-FPCR-ZZ-ZZ-DR-L-0001-P10
- PROPOSED SITE PLAN 11631_PL108_REV_J
- Proposed Elevations and Section PL112_REV G
- Proposed Contextual Elevations PL113_REV F
- Proposed Roof Plan PL111_REV G
- FRA AND DRAINAGE STRATEGY REPORT
- FRA AND DRAINAGE STRATEGY, uploaded in 7 parts via the public planning portal
- GREEN INFRASTRUCTURE STRATEGY 12641-FPCR-ZZ-ZZ-DR-L-0001 REVP06
- LOCATION PLAN 11631 PL101 REVA
- EXISTING SITE PLAN 11631 PL102 REVC
- EXISTING ELEVATIONS UNITS 5,6 11631 PL106 REVA
- PROPOSED SITE PLAN 11631 PL108 REVE

Consultation comments to the planning officer

0. General

- 0.1. The update FRA report dated October 2025 is now updated to align with National Standards, and qualifies 1D modelling criteria, however appendix H appears to be missing the 1D modelling results.
- 0.2. It is evident that whilst the drainage strategy drawings are updated, other supporting drawing have not, for example the levels and exceedance drawings still shows the former surface collection features and pavement types so these must be coordinated.

1. Runoff destination

- 1.1. The designer has confirmed infiltration with evidence of additional geotechnical testing. It is noted that the extent of permeable paving and infiltration to the ground has been maximised for the area being redeveloped.
- 1.2. The use of tree pits and rain gardens is now shown on the drainage and landscaping plans thus demonstrating compliance for biodiversity.

2. Interception drainage

- 2.1. The development demonstrates that the first 5mm of rainfall is dealt with, ensuring no run-off leaves the site, by utilising site wide infiltration.
- 2.2. It is noted that part of the existing site brownfield area to the north east existing building includes some betterment/retrofitting with inclusion of a small geocellular infiltration tank adjacent the outfall.

3. Extreme rainfall and flooding

- 3.1. Evidence of greenfield/pre-development run-off has been provided and the use of infiltration techniques has been confirmed. The latest rainfall data must be used which is currently FEH 22, and the 'data file' for this must also be provided.
- 3.2. The 1D modelling and risk of flooding from updated FRA appendix H require further evidence to the comments below:
- 3.3. Urban creep has been listed in the summary, however this is not applicable for this type of site use. Please refer to policy documents and adjust as required.
- 3.4. It is not possible to fully review the Causeway FLOW calculations without a supporting plan with the node/link/feature references. There are for example numerous flow controls without clarity on where these are and how the criteria has been set.
- 3.5. It is evident that half drain down times exceed 24hrs (typically around 30hrs), this implies there is insufficient storage provision. Please refer to ADC guidance where this must consider the 30yr return period.
- 3.6. It is evident that ponding/flooding occurs for both the 30yr and 100yr return periods, however without a supporting plan, it is not clear where flood volume will occur. This appears to be 140m³ (30yr) and 214m³ (100yr). Whilst we concur that surface water flooding can be accepted for the 100yr event/exceedances, provided it is suitably controlled and mitigates risks to buildings and daily operational areas, we remain concerned the 30yr event indicates significant flood volumes again indicating there may be insufficient storage provision.
- 3.7. Whilst appendix O includes a high level calculation for the proposed design using the HR Wallingford infiltration volume design tool from UK SuDS (with incorrect criteria), the complexity of the calculations must be reflective to scale of development where 1D modelling is provided inclusive of multiple return period and climate change factors.

4. Water quality

4.1. Water quality assessment is included with in the FRA, which is acceptable.

5. Amenity

5.1. A specific assessment of amenity benefit has not been submitted, however the revised FRA items 7.37-7.44 (& appendix F landscaping plan) suitably address matters in relation to the drainage strategy.

6. Biodiversity

6.1. A specific assessment of amenity benefit in included within the revised FRA. The drainage strategy now includes bioretention channels, permeable paving, bioretention trees, and rain gardens.

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

7.1. The proposed trees and drainage infrastructure on the site has been suitably coordinated.

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

From: Elaine Walby on behalf of Planning.Responses
Sent: 13 February 2026 10:41
To: Planning Scanning
Subject: FW: Planning Consultation on: LU/93/25/PL
Attachments: LU-93-25-PL - Units 5-7 Watersmead Business Park Norway Lane.docx

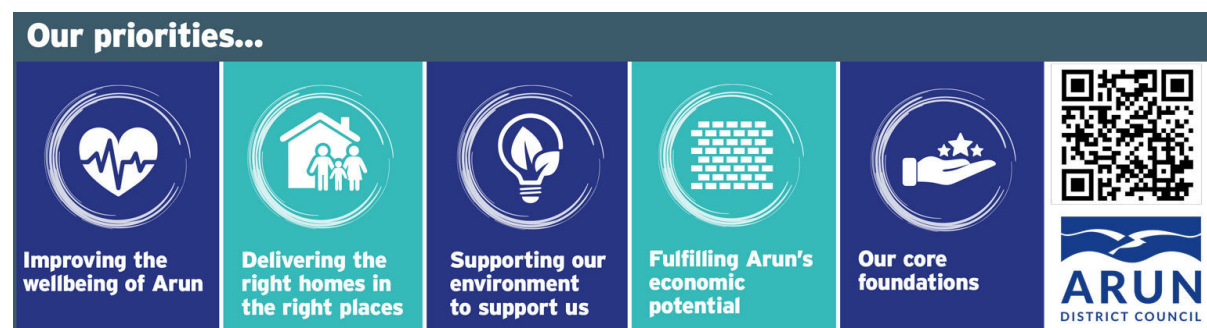
PL- Consultation- Engineers response

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 12 February 2026 11:16
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/93/25/PL

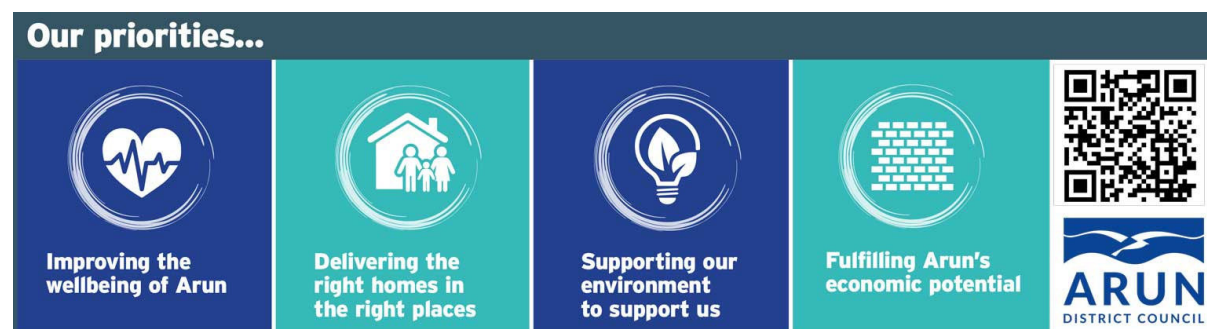
Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 12 January 2026 11:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/93/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: LU/93/25/PL
Registered: 28th May 2025
Site Address: Units 5-7 Watersmead Business Park Norway Lane/Worthing Road Littlehampton BN17 6LS
Grid Reference: 503817 103549
Category: Plan Applicat'n
Description of Works: Part demolition, conversion, refurbishment and re-elevation of Units 5 and 6 and construction of retail (food and non-food), and food & beverage units (Use Class E), together with associated car parking, access, loading areas, landscaping and associated works. This application is in CIL Zone 2 and is CIL Liable.

I am able to inform you that I have received an amendment to the above application dated 7th January 2026 relating to:- Substitute Flood Risk Assessment and Drainage Strategy V4

If you should wish to make further representations as a result of this amendment, please make any further comment by **3rd February 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

Emma Sheppard

Planning Case Officer- Arun District Council

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Email: emma.sheppard@arun.gov.uk

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