

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                                           |                            |            |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------|
| <b>Application Reference:</b>   | <b>LU/95/26/PL</b>                                                                                                                                                                                        | <b>Reviewer Reference:</b> | ADC/EXT4b  |
| <b>Planning Officer:</b>        | Amber Willard                                                                                                                                                                                             | <b>Date of Review:</b>     | 05/06/2026 |
| <b>Site Name:</b>               | P and O Scaffolding Ltd Toddington Lane Littlehampton BN17 7PN                                                                                                                                            |                            |            |
| <b>Application Description:</b> | Retention of change of use from agricultural land to scaffolding yard (Sui Generis). This application may affect the setting of a listed building and is in CIL Zone 2 (Zero Rated) as other development. |                            |            |
| <b>Assessment Number:</b>       | 1 of 2                                                                                                                                                                                                    |                            |            |

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

## Reviewed Plans

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

-LOCATION PLAN  
-FRA

## Consultation comments to the planning officer

### 0. General

0.1. This consultation relates primarily to the surface water drainage of the site. However, the planning officer is altered to the positioning of buildings within Flood Zone 3 with no explanation of why they cannot be located in areas of Flood Zone 1 (aside from the fact that they are already constructed/in situ). The FRA does not discuss the impact of climate change upon the flood risk classifications – with the flood map for planning indicating that a far larger proportion of the site will be in flood 3 in future.

0.2. The surface water drainage strategy does not account for the flood risk on the site and flood water is expected to enter the surface water drainage system via the permeable surfacing. This conflicts with advice against locating SuDS in flood risk areas.

#### 1. Runoff destination

- 1.1. The site is proposed to drain via infiltration. Water reuse has not been proposed and should be (in accordance with the hierarchy for sustainable drainage). The FRA makes no mention of water reuse and why it is not proposed on the site.
- 1.2. The design is supported by groundwater monitoring over a 2 month period from early February to early April. This is not long enough to cover the full winter period and therefore there is a risk that the peak groundwater level will be higher than that recorded. This is important because 1m of unsaturated depth must be maintained between the base of an infiltration feature and the peak groundwater level. Groundwater depths in this area are known to be variable and high, with nearby sites unable to rely on the use of infiltration.
- 1.3. Evidence of a single infiltration test has been submitted. The date of testing is unknown and evidence of 3 repeat tests (in accordance with BRE DG 365 have not been submitted. The calculations for the infiltration rate (f) appear to be incorrect and therefore the infiltration rate is inaccurate. The designer has used a high factor of safety, however, the methodology and calculations are expected to conform to those suggested by BRE DG 365.
- 1.4. Therefore, whilst the suggested use of infiltration is supported, its viability has been inadequately evidenced. Furthermore, no alternative disposal option has been suggested, should infiltration not be viable. Therefore, we **object** to the application on the basis that a viable disposal location has not been adequately evidenced.

#### 2. Interception drainage

- 2.1. Interception drainage has not been mentioned in the FRA. The site proposes to dispose of all surface water via infiltration, which if viable, will ensure that the runoff from the majority of frequent probable events will not leave the site. This will mean that the interception standard is achieved.
- 2.2. However, if infiltration is not viable (see paragraphs 1.2-1.4) then interception will have to be achieved via water reuse or evapotranspiration. The use of evapotranspiration may affect the scale and layout of the site and as such we **object** to the application in relation to this standard.

#### 3. Extreme rainfall and flooding

- 3.1. The design is supported by calculations. These purportedly use FEH 22 rainfall data – however evidence of this is not submitted. The half drain time is not within 24 hours which is surprising given the infiltration rate used. The designer claims this is because the sides of the infiltration feature are used instead of the base. However, they have applied a factor of safety to account for siltation of the base which is only necessary when the base of the infiltration feature is accounted for in the calculations. It is suggested that the design could be revised to account for infiltration through the base of the blanket features and the sides not accounted for.
- 3.2. The estimated greenfield runoff rates and volumes for the site have not been submitted. These are unlikely to affect the design if infiltration is viable. However, if infiltration is later found not to be viable then these are critical to determine the allowable discharge rate from the site. The

placement of surface water storage and infiltration in Flood Zone 3 without evidence that it has been designed to be and demonstrated to operate under flood conditions warrants **objection** on this standard. However, other elements could be approved via a suitably worded condition.

#### 4. Water quality

- 4.1. The water quality assessment is inadequate and inaccurate for the purposes of the design. The designer has classified the site as having a high hazard level due to its use as a lorry park. The SuDS Manual stipulates that a detailed risk assessment is undertaken and submitted for all high hazard level sites. This would include site specific information used to define likely pollutants and their significance and more detailed, component specific performance information used to demonstrate compliance. This has not been submitted.
- 4.2. Instead, the designer relies on the simple index approach, appropriate to lower hazard sites. Arbitrary pollution hazard indices are applied to the site. The designer then claims the double benefit of 2 constructed permeable pavements acting on top of each other for the increased subbase depth (doubled from 300mm to 600mm). Whilst this seems reasonable at face value, it fails to account for the surface, additional geotextile, and underlaying soil which would be present for the second permeable paving to perform it's full water treatment function (and achieve it's SuDS mitigation indices). This means that even when using the incorrect methodology (simple index approach) the designer is not adequately reporting the water treatment offered by the design.
- 4.3. In the absence of a compliant water treatment assessment and due to the high hazard level of the site an **objection** is warranted due to the risk of pollution to groundwater as a result of the application.

#### 5. Amenity

- 5.1. Amenity is not discussed in the application. The permeable surfacing will provide multifunctional benefit, as the yard surface, water treatment and storage. It is acknowledged that the use of the site will limit opportunities for amenity benefit. As such, we would not object to the application on these grounds subject to a suitably worded condition relating to the detailed design.

#### 6. Biodiversity

- 6.1. The drainage strategy does not include a BRO assessment and there does not appear to be any features include which provide biodiversity benefit. The inclusion of SuDS features which provide biodiversity benefit may impact the scale and layout of the site and therefore we **object** to the application in relation to this standard.

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

- 7.1. There are trees on the site which are likely to impact the proposed drainage strategy, these are not considered as a constraint within the FRA. It also does not mention maintenance or construction and structural integrity of the system. However, these details could be submitted and approved via a suitably worded 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



**From:** Elaine Walby on behalf of Planning.Responses  
**Sent:** 09 June 2026 14:40  
**To:** Planning Scanning  
**Subject:** FW: Planning Consultation on: LU/95/26/PL  
**Attachments:** LU-95-26-PL - P and O Scaffolding Ltd.docx

PL- Consultation- Engineers response

**Elaine Walby**  
**Technical Support Assistant**  
**Planning Services**

**T:** 01903 737 904  
**E:** [elaine.walby@arun.gov.uk](mailto:elaine.walby@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://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>

Our priorities...



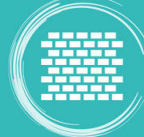
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



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**From:** Paul Cann <Paul.Cann@arun.gov.uk>  
**Sent:** 05 June 2026 13:19  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: LU/95/26/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](mailto:paul.cann@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://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](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 21 May 2026 10:11  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: LU/95/26/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

|                              |                                                                                                                                                                                                           |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Application No:</b>       | <b>LU/95/26/PL</b>                                                                                                                                                                                        |
| <b>Registered:</b>           | 23rd April 2026                                                                                                                                                                                           |
| <b>Site Address:</b>         | P and O Scaffolding Ltd Toddington Lane Littlehampton BN17 7PN                                                                                                                                            |
| <b>Grid Reference:</b>       | 503601 103931                                                                                                                                                                                             |
| <b>Description of Works:</b> | Retention of change of use from agricultural land to scaffolding yard (Sui Generis). This application may affect the setting of a listed building and is in CIL Zone 2 (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 5th June 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

Amber Willard

Planning Officer- Arun District Council

Telephone: 01903 737942

Email: [amber.willard@arun.gov.uk](mailto:amber.willard@arun.gov.uk)