

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/96/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Amber Willard	Date of Review:	09/06/2026
Site Name:	Flint Acre Toddington Lane Littlehampton BN17 7PN		
Application Description:	Retention of change of use from agricultural land to containerised storage facility (B8). This application may affect the setting of a listed building and is in CIL Zone 2 (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 in principle
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	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:

- LOCATION PLAN
- EXISTING SITE PLAN A.050
- COVER LETTER
- PLANNING AND HERITAGE STATEMENT

Consultation comments to the planning officer

0. General

0.1. There is an area of Flood Zone 2 at the access to the site and within the red line boundary, and no site-specific flood risk assessment has been submitted. This is required (in accordance with paragraph 181 and footnote 63 of the NPPF and the validation requirements of Arun District Council). In the absence of one, we **object in principle** to the application. Areas of flood risk also need to be considered as part of the drainage strategy for the site.

0.2. It is noted that some of the works described within the application are already constructed/in use. This includes the introduction of impermeable surfaces which may have increased flood risk. The drainage of existing impermeable surfaces is uncertain and no details of the drainage of the site

have been submitted. The application form states that there are no watercourses within 20m of the site and yet proposes to dispose of surface water to a watercourse. Further works may be required to elements which have already been constructed to ensure that flood risk is not increased.

1. Runoff destination

1.1. The application form proposes to dispose of surface water to a watercourse. No information has been submitted to demonstrate why higher priority disposal options like water reuse and infiltration have been ruled out. This is in conflict with the hierarchy of sustainable drainage specified by the PPG, ADC local plan policy W DM3 and the national standards for suds. We therefore **object** to the application.

2. Interception drainage

2.1. No information regarding interception drainage has been submitted. This can affect the scale and layout of the site and as such we **object** in relation to this standard.

3. Extreme rainfall and flooding

3.1. It is unclear how this site may be drained without increasing flood risk in both regular and extreme events. It is also unclear how flood water (from the flood zone) will be prevented from entering the drainage system. This can affect the scale and layout of the site and as such we **object** in relation to this standard.

4. Water quality

4.1. No information regarding water treatment has been submitted. The proposed use is medium to high hazard risk (to be determined depending on the vehicles and materials stored and used on the site. Due to the potentially high risk, surface water drainage design needs to be carefully considered and this may affect pollution risk from the site. This can affect the scale and layout of the site and as such we **object** in relation to this standard.

5. Amenity

5.1. No information regarding amenity of the SuDS has been submitted. This can affect the scale and layout of the site, however, it is acknowledged that opportunities for amenity on sites of this scale and use are limited. It is expected that such opportunities are maximised via a suitably worded condition, however we do not object in relation to this standard.

6. Biodiversity

6.1. No information regarding biodiversity in the drainage design has been submitted. 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 no trees on the site which are likely to impact the proposed drainage strategy. The application includes no information regarding maintenance however, this may be submitted via conditions applied to a planning permission. Further details regarding construction and structural integrity of the system may be agreed via conditions.

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: Daun Johnson on behalf of Planning.Responses
Sent: 16 June 2026 15:46
To: Planning Scanning
Subject: FW: Planning Consultation on: LU/96/26/PL
Attachments: LU-96-26-PL - Flint Acre Toddington Lane.docx

Please upload attachment to LU/96/26/PL, planning, consultee response, END

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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: 16 June 2026 13:37
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/96/26/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: 21 May 2026 10:11
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/96/26/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/96/26/PL

Registered: 23rd April 2026
Site Address: Flint Acre Toddington Lane Littlehampton BN17 7PN
Grid Reference: 503530 103871
Description of Works: Retention of change of use from agricultural land to containerised storage facility (B8). 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

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Email: amber.willard@arun.gov.uk

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