

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/98/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	26/05/2026
Site Name:	16 Swanbourne Road Littlehampton BN17 6HS		
Application Description:	Erection of 1 No single storey dwelling with car parking and provision of driveway and car parking for No. 16 Swanbourne Road (resubmission following LU/96/25/PL). This application is in CIL Zone 4 and is CIL Liable as a new dwelling.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	Further information
3. Extreme Rainfall and Flooding	Insufficient	Further information
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

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

- FOUL AND SURFACE WATER DRAINAGE REPORT
- PROPOSED TYPICAL CONSTRUCTION DETAILS 501 REV2
- PROPOSED CONTRIBUTION AREA 201 REV2
- PROPOSED DRAINAGE STRATEGY 101 REV1
- LOCATION AND EXISTING SITE PLANS 23123-01
- PROPOSED SITE PLAN 23123-02
- BLOCK PLAN, FLOOR PLAN, ELEVATIONS, ROOF PLAN 23123-03
- STREET ELEVATIONS 23123-04
- METRIC
- RESPONSE TO ENGINEERS COMMENTS
- DRAINAGE CALCULATIONS
- DRAINAGE CALCULATIONS

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

N/A

Consultation comments to the planning officer

0. General

- 0.1. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.2. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.3. We have reviewed the Foul and Surface Water Drainage Report revision P2 dated 22 April 2026.
- 0.4. We note the previous comments on application LU/96/25/PL and the Responses to engineers comments note.
- 0.5. Please note the application includes engineering works outside the red line boundary which appear to be within the blue outline of land ownership.

1. Runoff destination

- 1.1. Water butts are shown and are suitable for small scale residential garden irrigation.
- 1.2. The proposed runoff destination is now solely discharge to ground via infiltration although a flow control chamber is still shown on the drainage layout and in the calculations but it appears to be redundant and not part of the drainage design.
- 1.3. Ground Investigation is provided but does not meet the standards set out in the ADC ground investigation checklist requirements. Guidance is provided on ADC webpages here: <https://www.arun.gov.uk/designer-checklists>
- 1.4. The groundwater monitoring measurements are every two weeks and therefore do not accord with the ADC ground investigation checklist requirements. However, the results are sufficiently robust to demonstrate groundwater levels are comfortably below the 1m vertical buffer from the proposed base of soakaways.
- 1.5. Further information is required to evidence the infiltration tests. Infiltration calculations are provided without supporting evidence. The location of Infiltration testing is not shown and the test pit record log is blank. No information is provided on dates, times and recorded water depths throughout the test. No photographs during the test are provided.
- 1.6. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 1). As this is critical to draining the site, we **Object** to this application.

2. Interception drainage

- 2.1. Interception drainage is currently provided by discharge to ground. This will need to be confirmed as part of determining runoff destination.

3. Extreme rainfall and flooding

- 3.1. Calculations are provided for the design storm and show no flooding. Drained area and modelling parameters are acceptable.
- 3.2. There is a flow control chamber, S5, including on the layout and in the calculations which appears to be orphaned/redundant and should be removed for clarity.

- 3.3. The half drain times during the 3.3% AEP storms need to be evidenced in the calculations.
- 3.4. Further information is required to confirm the infiltration testing results, see Standard 1 above.
- 3.5. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3).

4. Water quality

- 4.1. The water pollution indices risk is low and water quality mitigation is provided by permeable pavement and filter drains / filter chambers, which meet the standards set out in the Simple Index Approach.
- 4.2. Water quality is acceptable.

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. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

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. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an Exception to Standard 6 is allowable.

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

- 7.1. The dwelling will share a surface water drainage system with the existing house and the soakaway will be on third party land once the new dwelling is sold. The proposed soakaway is not within the planning red line boundary but is within the land ownership of the existing house as outlined on the Location Plan and rights of discharge will need to be included in the deeds.
- 7.2. A maintenance plan is provided which is acceptable for a single dwelling development.

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: 26 May 2026 16:20
To: Planning Scanning
Subject: FW: Planning Consultation on: LU/98/26/PL
Attachments: Lu-98-26-PL 16 Swanbourne Road 1.docx

PL- Consultation- Engineers response

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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>

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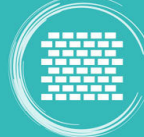
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 26 May 2026 15:28
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/98/26/PL

Please find enclosed our consultants response, an objection.

Regards

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Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 01 May 2026 09:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/98/26/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/98/26/PL
Registered:	30th April 2026
Site Address:	16 Swanbourne Road Littlehampton BN17 6HS
Grid Reference:	502952 103049
Description of Works:	Erection of 1 No single storey dwelling with car parking and provision of driveway and car parking for No. 16 Swanbourne Road (resubmission following LU/96/25/PL). This application is in CIL Zone 4 and is CIL Liable as a new dwelling.

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 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

Kathryn Welch

Planning Officer- Arun District Council

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