

Ref: C3489
10 June 2026

Re: Engineers Comments Regarding Surface Water Drainage- 16 Swanbourne Road Littlehampton BN17 6HS. 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).

Application reference: LU/98/26/PL

Reviewer Reference: ADC/EXT5/AF

Date of Review: 26/05/2026

Planning Officer: Kathryn Welch

Dear Kathryn Welch

I refer to the letter from the Arun District Council dated **26 May 2026** with regards to the above planning application.

The LPA has objected to the application, providing the detailed comments set out below. Our response in green to each of these points is provided accordingly.

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

Noted.

1. Runoff destination

- 1.1. Water butts are shown and are suitable for small scale residential garden irrigation.

Noted

- 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.

Noted and updated. The flow control chamber has been removed from both the drainage calculations and drawings, and the design now solely comprises discharge to ground via infiltration.

- 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>

Noted and updated. Noted and updated. Following a review of the ADC Ground Investigation Checklist, all previously omitted information has been provided within the updated drawings and supporting reports. In addition, the previously omitted Infiltration Testing Report has now been submitted.

Please refer to the updated Drainage Drawing (Revision P2), Groundwater Monitoring Report, and Infiltration Testing Report.

- 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.

Noted.

- 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.

Noted. The previously omitted Infiltration Testing Report has now been provided in accordance with the Arun District Council Ground Investigation Checklist.

- 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.

Noted. The submitted Infiltration Testing Report confirms the feasibility of infiltration as the primary method for managing all surface water runoff from the site, supplemented by previously accepted water butts. This demonstrates compliance with NSfS Standard 1: runoff destinations.

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.

Noted. Please refer to the submitted Infiltration Testing Report, which confirms the suitability of the underlying soils for infiltration, with a recorded infiltration rate of 8.42×10^{-5} m/s. Based on these results, discharge to ground via infiltration has been confirmed as the appropriate runoff destination for interception drainage.

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.

Noted

- 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.

Noted and updated. The flow control chamber has been removed.

- 3.3. The half drain times during the 3.3% AEP storms need to be evidenced in the calculations.

Noted. For clarity, separate 1 in 30-year storm event calculations have been provided, clearly showing the maximum water level within the tank at 5.611 mAOD. The model demonstrates that after 304 minutes the tank drains to below half full. The storage tank operates between levels 5.300 mAOD and 5.700 mAOD. Please refer to attached 1 in 30-year storm event calculations.

- 3.4. Further information is required to confirm the infiltration testing results, see Standard 1 above.

Noted. Please refer to the submitted Infiltration Testing Report

- 3.5. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3).

Noted. Noted. With regard to NSfS Standard 3 (management of extreme rainfall and flooding), exceedance flow route drawings have been provided to demonstrate that exceedance flows are appropriately managed within the site.

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.

Noted.

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.

Noted.

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.

Noted.

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.

Noted.

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.

Noted.