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Lead Local Flood Authority

Date 8th May 2026

Mr S Davis
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Mr Davis,

RE: **WA/18/26/PL - Land off Arundel Road Fontwell**

Thank you for your consultation on the above site, received on 24th April 2026. We have reviewed the application as submitted and wish to make the following comments.

This is a full application for the erection of 64 residential dwellings with access off Arundel Road, together with associated parking, open space, play space, landscaping, drainage and infrastructure.

The amended comments can be seen in **blue**.

We **maintain our objection** to this application**:**

1. Evidence that each standard of the new National Standards for SuDS (NSfS) (July 2025) have been met, in particular regarding interception and source control. Since the previous outline application, the NSfS have updated, and it is important these are addressed at full application stage, as it may alter the layout of the site.

   We request that the Designer checklists | Arun District Council are used when addressing the comments below.

2. From the documentation provided, we have a significant concern that, due to high groundwater levels, the current design will not be viable. Section 1.15 of the above NSfS states that a minimum of 1m clearance between the base of any infiltration feature and the highest level of groundwater. Please confirm that this standard can be met, with appropriate evidence. Alternatively, please provide a revised drainage strategy incorporating an alternative method of surface water management. We understand this is likely to be utilisation of a WSCC Highway drain. If so evidence of approval for this should be appended (we note the current

document states this is included at Appendix G, however we could not locate it. If it has already been provided, please confirm the page number).

We are of the understanding that the highest recorded winter groundwater level is 1.4 mbgl in WS06 (although we do not appear to have the full winter results submitted under this application, we are relying on Table 2 in the FRA). For TP05, where the infiltration basin is proposed to be located, only 2 tests have been completed, which does not comply with BRE365 testing standards. The proposed base of the infiltration basin is 1.2 mbgl. This therefore means there is only 0.2m between the base of the infiltration basin and the highest groundwater level. This does not comply with the National Standards for SuDS, which state that a minimum of 1m clearance between the base of any infiltration feature and the highest level of groundwater. As this is a full planning application, this is not something we are able to condition, as the drainage strategy is likely to affect the layout of the site.

As previously requested, we therefore need a revised drainage strategy with an alternative method of draining the site.

3. Based on the outcome of Point 2, we may require updated water quality indices that comply with the requirements for discharge to a surface water sewer (as per Standard 4)

   The applicant has stated: "*The water quality will remain the same whether it drains via infiltration or to a sewer*".

   This statement is incorrect. In accordance with Standard 4 (Water Quality), the Ciria SuDS Manual Simple Index approach shall be used. The mitigation indices for discharges to groundwater (via an infiltration-based system) and discharges to surface water sewers are different. It is important that the correct mitigation indices are used.

4. We concur with the proposal to line some of the proposed permeable paving due to groundwater levels, however should there be any areas within the site that have the opportunity to utilise unlined attenuation, this should be explored.

   See point 2 – we are concerned that there is only 0.2m between the base of the infiltration basin and the highest groundwater level.

~~5. We have noted that the strategy states at 5.3.19 that FEH 2022 has been employed (which is correct for our requirements), however the provided calculations state FEH 1999, please confirm which is correct/update calculations if necessary.~~

   The applicant has stated that the latest FEH data has been manually entered, therefore this is adequately addressed.

6. ~~We have some concerns that the calculations may not be site specific. Region 6 does not cover this are of West Sussex.~~

   The correct region is now being used in calculations. This matter is adequately addressed.

We will review this objection when the issues highlighted above are adequately addressed and we are formally reconsulted. When preparing any further documents to address the above comments, we recommend clearly highlighting where amendments have been made.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
[redacted]

[redacted]

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to [redacted] but the responding officer can be contacted directly via email if there are any questions relating to this response.

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