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Lead Local Flood Authority

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

Date 5th June 2026

Dear Mr Davis,

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

Thank you for your consultation on the above site, received on 26th May 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.

We **maintain our objection** to this application, and require additional information:

Standard 1: runoff destinations

While water butts are mentioned in 1.3.4 for rainwater harvesting, these are not included in the Drainage Strategy Plan. To ensure these are included during construction, we would recommend a note or the location of the water butts is added.

It has been demonstrated that infiltration is not a viable method of draining the site, as high groundwater levels mean a 1m freeboard cannot be provided between the base of the basin and the highest groundwater level (as stated in National Standards for SuDS). As there are no ordinary watercourses nearby, it is proposed to discharge surface water at a restricted rate into WSCC highways drainage, as previously discussed with highways in January 2025. In those emails, the applicant proposed replacing a poor condition 150mm diameter highway drainage pipe with a 225mm diameter pipe. This is not included in the Drainage Strategy Plan.

While infiltration is not being used to drain the site, there are several instances where the drainage strategy implies infiltration is still being used. For example, paragraphs 1.3.23 and 1.3.34 and the Contributing Areas Plan and Drainage Strategy Plan all still mention infiltration or infiltration basin. This does not accurately reflect how the site is proposed to drain. There may be other instances where this is an issue. It is also important that this is

reflected in any other relevant document submitted under this application, to ensure documents are consistent.

Standard 2: management of everyday rainfall

While a swale is mentioned in para 1.3.20 to 1.3.21, it is not included in the Drainage Strategy Plan or calculations.

We would recommend using the below example when assessing interception:

Positively drained surface area	Interception method	Details of how Standard 2 met
Parking/private road	Permeable surfaces	No additional drained area XXX area - provides XXX area of interception
Access road	Swale	Longitudinal gradient of swale less than 1:100 500mm base material Xxx swale vegetated base area - provides XXX area of interception
Residential areas		
School / medical building	Green roof	XXX area - XXX area of interception

This shall correspond with the Contributing Area Plan.

Standard 3: management of extreme rainfall and flooding

In the Contributing Areas Plan, the footprint of the attenuation basin is not included, which conflicts with the National Standards for SuDS. We request this is updated, with the Drainage Strategy Plan and corresponding hydraulic calculations amended where necessary.

It is unclear whether the design of the attenuation basin has considered the high groundwater levels. We request a cross section of the basin and porous paving, to ensure groundwater is considered in the design of SuDS features.

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.

While the report states FEH 2022 rainfall model has been used, the calculations state FEH 1999 rainfall model has been used.

It is unclear whether freeboard from the 1 in 100 year plus climate change event has been included in the basin design.

Standard 5: Amenity and Standard 6: Biodiversity

There appears to be some conflicts between the current Drainage Plan and the landscaping plans with regards to proposed tree planting locations and open SuDS features.

Standard 7: Design of drainage for construction, operation, maintenance, decommissioning and structural integrity

A minimum 3m easement for the attenuation basin is required, for maintenance access.

Yours sincerely,

Eleanor Read
Flood Risk Management Team

[Redacted signature]

[REDACTED]

From: Elaine Walby on behalf of Planning.Responses
Sent: 09 June 2026 14:56
To: Planning Scanning
Subject: FW: Response to application WA/18/26/PL
Attachments: WA 18 26 PL recon May 26.pdf

PL- Consultation- WSCC Drainage response

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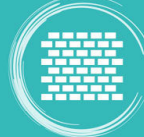
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From: [REDACTED]
Sent: 05 June 2026 14:30
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Response to application WA/18/26/PL

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

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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