Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Lead Local Flood Authority

Date 14th July 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 29th June 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.~~

This is adequately addressed.

~~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.~~

This is adequately addressed. We can cover the actual highways works via an appropriately worded condition.

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.

The infiltration basin is still included in the Contributing Areas plan.

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.

As stated by the applicant in paragraph 1.2.8, Standard 2 (Interception) is not met, and we are not aware that a departure from the Standards has been agreed with the LPA as approving body. For avoidance of doubt, as LLFA, we are unable to agree to any departures, because we are not the approving body. As stated, it is currently proposed that the porous pavement will be lined and will also drain the roof area. This means that the Permeable surfaces section of Standard 2 is not complied with. Additional interception features are required.

While attenuation basins do not count as an interception basin, a detention basin may if designed according to the Standards.

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.~~

This is adequately addressed.

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.

This is not adequately addressed. Currently, the cross section shows that the base of the basin is where the highest groundwater level is located. There does not appear to be any evidence of how the groundwater has been considered in the design of the basin. It is important the capacity of the basin is not impacted by high groundwater levels, as flood risk could increase elsewhere.

In addition, the permeable paving cross section is missing.

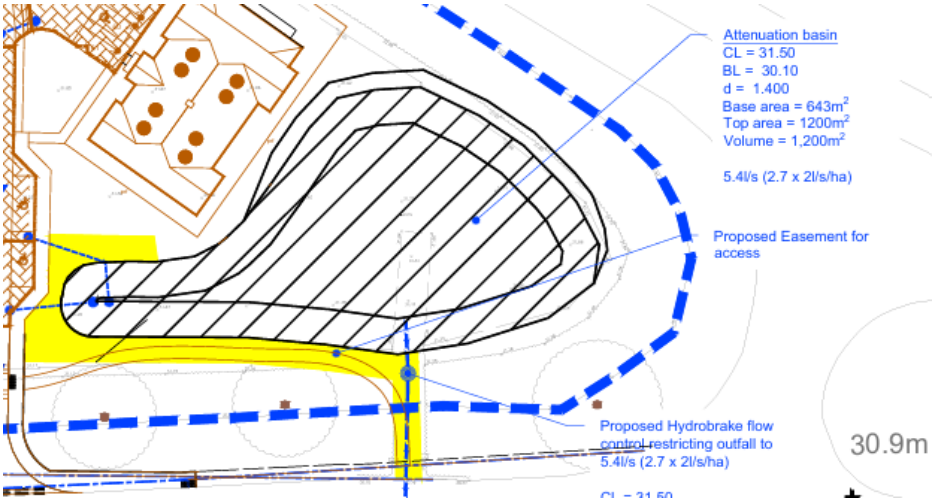
It is unclear whether freeboard from the 1 in 100 year plus climate change event has been included in the basin design.

To ensure the application is in accordance with national planning policy and guidance, residual risk should be safely managed. There is currently 50mm between the maximum water level in the 1 in 100 plus climate change event (design event). There does not appear to be any plans showing finished floor levels. This therefore means the residual risk if the capacity of the basin and associated infrastructure were exceeded has not been adequately addressed.

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.~~

This is adequately addressed.

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.



The easement shall go around the entire basin, rather than part of it. In particular for the side near the building, it is unclear whether the basin can be safely maintained.

As these issues could affect the layout and scale of the site, it would not be reasonable for the above to be covered via conditions at this stage.

Yours sincerely,

Eleanor Read
Flood Risk Management Team
[redacted]

[redacted]

[redacted]

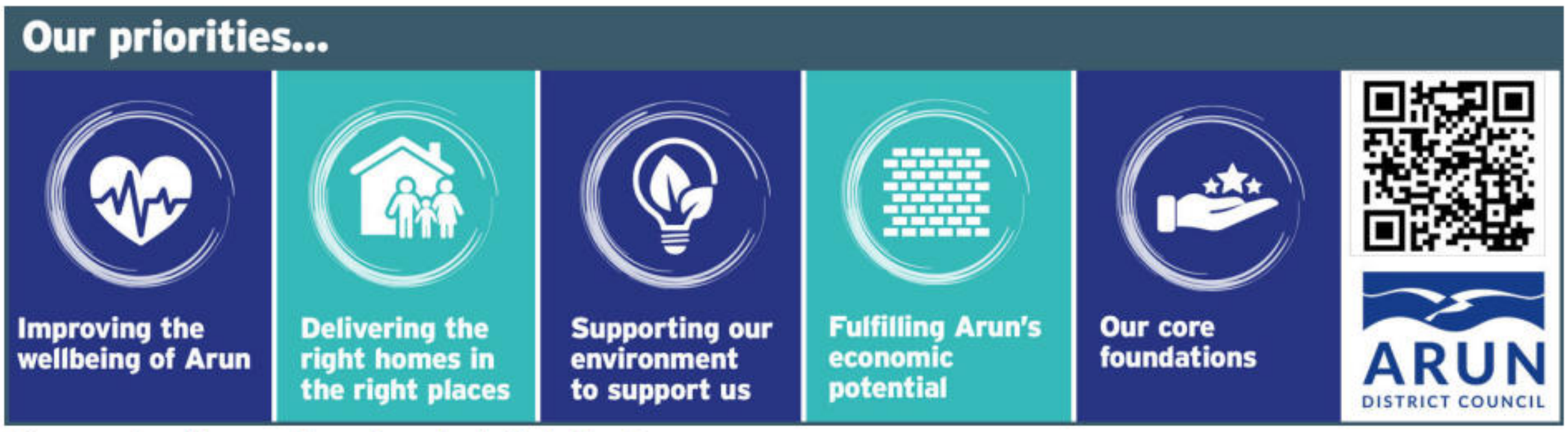
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From: Eleanor Read [redacted]
Sent: 14 July 2026 21:07
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Response to WA/18/26/PL

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.

Good evening,

Please see response attached.

Kind regards,
Ellie

Eleanor Read

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