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From: Jack Karagoz [REDACTED]
Sent: 08 September 2026 14:24
To: Simon Davis <Simon.Davis@arun.gov.uk>
Cc: Rebecca Hornsby [REDACTED]
Subject: RE: WA/18/26/PL - Land off Arundel Road Fontwell

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Hi Simon,

I have spoken to Chris Smoker our Drainage Engineer who has provided the below response. Would you be able to update/reconsult with the LLFA to remove their objection?

Ideally if this could go over to the LLFA today that would be great because the last response we provided it took more than a week for the admin team to upload it. I will need to speak to my client about the EoT so I will revert back to you shortly.

The overall masterplan was based on the previous (withdrawn) outline application for which was agreed with the LLFA. This was based on infiltration and followed a full winters ground water monitoring. Based on the agreed parameters, standard 2 would have been met in full. However, this guidance wasn't in place at that time.

Since this time, the new National SUDS Standards have been published and along with that the LLFA have changed their previous advice in not allowing infiltration to be used.

As part of this application, the drainage approach is now to provide a system of linked porous pavements which link to a shallow detention basin with a controlled outfall into a highway drain. Roof water will drain into the porous pavement.

We originally reviewed standard 2 using the simplified approach as set out in the guidance. This states that where the permeable surface also drains an adjacent impermeable area and is lined, compliance shall not be deemed to have been achieved.

We have now reviewed this standard further and have provided further evidence in the form of calculations to compare the volume of porous paving with the volume generated from the first 5mm of rainfall. This is shown below and shows the volume within the porous paving to far exceed the volume of rainfall.

Ref	Length	Width	Area	Depth	volume	Contributing Area	Volume of first 5mm
PP 1	105	8.8	923	0.80	194	1447	7.2
PP 2	73	7.5	548	0.80	115	1343	6.7
PP 2A	23	14.5	334	0.50	40	334	1.7
PP 2B	23	6.2	143	0.80	30	279	1.4
PP 3	48	12.9	621	0.80	130	1132	5.7
PP 4A	44	5.2	228	0.80	48	438	2.2
PP 4	83	6.1	504	0.80	106	1671	8.4
PP 5	50	9.1	454	0.80	95	659	3.3
PP 6	120	8	959	0.80	201	2007	10.0

Given the porous paving has been designed to accommodate both its own surface area and the adjacent roof area which drains through it whilst also conveying the surface water, it can be seen to act like a swale than a standalone porous pavement.

The standards state that a lined swale can accommodate an impermeable area five times its plan area.

If the factor of 5 is applied to the total area of porous paving (4,714m²) this will accommodate a total impermeable area of 23,570m² double the actual impermeable area of 10,030m². It is also worth noting that flows will pass through the planted basin which will act as a swale for low flows which will accommodate a further 2,995m² of impermeable area (599m² x 5).

Based on the above - it can be seen that the first 5mm of runoff can be accommodated on site, therefore standard 2 can be met and trust the LLFA objection can be removed.

Kind regards

Jack Karagoz MRTPI
Associate – DHA London

[Redacted signature]

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From: Simon Davis <Simon.Davis@arun.gov.uk>

Sent: 08 September 2026 12:24

To: Jack Karagoz [REDACTED]

Cc: Rebecca Hornsby [REDACTED]

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

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Dear Jack,

Sorry but I have been told that I am out of time and the report is not finished so this will have to go to October instead. Please can you therefore agree an extension until 21/10/26. I await your response on the further Drainage comments. My Team Leader and I will then need to determine whether we can recommend approval with the departure from standards.

Kind Regards

Simon

Simon Davis MRTPI

Principal Planning Officer, Directorate of Growth

T: 01903 737874

E: simon.davis@arun.gov.uk

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From: Simon Davis

Sent: 07 September 2026 13:12

To: 'Jack Karagoz' [REDACTED]

Cc: Rebecca Hornsby [REDACTED]

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

Dear Jack,

I have just seen the latest WSCC Drainage comments on our website. Please can you comment on whether it is or isn't possible to amend the layout to show additional interception features, such as rain gardens and swales.

Notwithstanding I shall proceed to work on the report on the basis of the conditions requested however I make no guarantees as to whether I can get it on the agenda for September as technically the agenda deadline has passed and my report will need to be reviewed by two separate people.

Kind Regards

Simon

Simon Davis MRTPI

Principal Planning Officer, Directorate of Growth

T: 01903 737874

E: simon.davis@arun.gov.uk

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