

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/51/26/RES	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Davis	Date of Review:	14/09/2026
Site Name:	Land East of Wandleys Lane Fontwell		
Application Description:	Approval of reserved matters following the grant of outline planning permission WA/35/23/OUT, for the construction of 95 No. new homes, access, new pedestrian and cycle links, open space, landscaping, habitat creation, drainage features and associated groundworks and infrastructure, including details relating to the Sensitive Lighting Strategy, POS details and Part M Compliance. This application is in CIL Zone 3 and is CIL Liable as new dwellings.		
Assessment Number:	2		

Policy and Guidance Information	
Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater Land Drainage Consent – https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/ Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/ Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds The SuDs Manual [C753] by CIRIA	

Response	No Objection
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References
The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development. The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025. This consultation has been primarily informed by the NSfS and The SuDS Manual.

Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will likely result in an **objection** to an objection to a full or reserved matters planning application.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

Standard	Assessment	Response
1. Runoff destination	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection

Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- DRAINAGE PLANS
- PROPOSED DRAINAGE DETAILS SHEET 1 OF 6 401-A01, 6 parts uploaded via public planning portal
- EXCEEDANCE FLOW ROUTES SHEET 1 OF 2 5988-005-0520-A02
- EXCEEDANCE FLOW ROUTES SHEET 2 OF 2 5988-005-0521-A02
- EXISTING EXCEEDANCE FLOW ROUTES SHEET 1 OF 2 5988-005-0525-A01
- EXISTING EXCEEDANCE FLOW ROUTES SHEET 2 OF 2 5988-005-0426-A01
- IMPERMEABLE AREAS PLAN SHEET 1 OF 2 5988-005-0530-A02
- IMPERMEABLE AREAS PLAN SHEET 2 OF 2 5988-005-0531-A02
- DRAINAGE STRATEGY SHEET 1 OF 2 5988-005-5551-A02
- DRAINAGE STRATEGY SHEET 2 OF 2 5988-005-5552-A02
- DRAINAGE STRATEGY MANHOLE SCHEDULE 5988-005-5555-A01
- LOCATION PLAN 250515/LP01
- SITE LAYOUT 250515/SL01 REVAQ

- SITE LAYOUT MATERIALS 250515/SL07 REVC
- DRAINAGE STATEMENT
- DRAINAGE CALCULATIONS
- TEST CERTIFICATE DETERMINATION OF PARTICLE SIZE DISTRIBUTION
- MANHOLE DETAILS
- PLANNING STATEMENT
- TANK BOUYANCY ARCHIMEDES' PRINCIPLE
- RAIN GARDEN AREA INTERCEPTED
- EXCEEDANCE FLOW ROUTE SHEET 1 OF 2 REV A03
- EXCEEDANCE FLOW ROUTE SHEET 2 OF 2 REV A04
- IMPERMEABLE AREAS PLAN SHEET 1 OF 2 REV A03
- IMPERMEABLE AREAS PLAN SHEET 2 OF 2 REV A03
- LEVELS STRATEGY SHEET 1 OF 2 REV A04
- LEVELS STRATEGY SHEET 2 OF 2 REV A04
- PROPOSED DRAINAGE DETAILS SHEET 4 OF 6 REV A03
- 5988 - 005 SURFACE WATER CALCULATIONS
- 5988_005_002_DRAINAGE STATEMENT REV A04
- DRAINAGE STRATEGY SHEET 1 OF 2 REV A04
- DRAINAGE STRATEGY SHEET 2 OF 2 REV A04
- 5988 - 005- INTERCEPTION CALCS (EXCEL)
- ARUN DITCH MAP (004)
- GROUNDWATER LEVELS REV P02
- INTERCEPTION AREAS PLAN SHEET 1 OF 2 REV A02
- INTERCEPTION AREAS PLAN SHEET 2 OF 2 REV A02
- RESPONSE TO ADC DRAINAGE 14-08-26
- ENGINEERS COMMENTS REGARDING SURFACE WATER DRAINAGE

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- DRAINAGE STRATEGY SHEET 1 OF 2 REV A04
- DRAINAGE STRATEGY SHEET 2 OF 2 REV A04

Consultation comments to the planning officer

0. General

- 0.1. The outline planning application was consented via planning appeal with a Decision Notice dated 7 April 2025. There were no drainage or flood risk reasons for refusal. Conditions were applied to require a detailed drainage strategy to be submitted and approved as part of the reserve matters application (Condition 13).
- 0.2. Further conditions attached to the planning consent require the technical design of the sustainable drainage system (C14), construction phase surface water management plan (C15), Management and Maintenance Plan (C16) and verification of the works constructed in accordance with the approved plans (C17).
- 0.3. The planning consent was granted marginally before the introduction of the National Standards for Sustainable Drainage (NSfS) and in accordance with Arun DC guidance the design should seek to incorporate the new requirements where feasible within the site constraints.
- 0.4. We have reviewed the Designer's responses to comments dated 14 August 2026 together with the revised drawings and calculations listed in the review plans above.

1. Runoff destination

- 1.1. Water butts are now shown and can be specified at discharge of conditions stage.
- 1.2. The ground investigation shows relatively shallow groundwater (up to 1.4m bgl) and the subsoil classification may not be suitable for a full infiltration solution. The infiltration testing provided is a 1m deep and infiltration features at this depths would not be feasible due to shallow groundwater. There is no infiltration testing undertaken at shallow depths for rain gardens / permeable paving in the parts of the site where groundwater levels allow shallow infiltration. There may be potential for partial infiltration solution. The design now incorporates shallow features with high level overflow which need to be confirmed through infiltration testing. Infiltration testing is a requirement of Condition 13 but can be presented at discharge of conditions stage where partial infiltration should be utilised where feasible.
- 1.3. The proposed runoff destination is in accordance with the outline strategy, which is to the southeast edge of the site. We are satisfied that the watercourse connection is feasible and the watercourse connects downstream to the wider land drainage network. Downstream maintenance is the responsibility of the Riparian Owners and not a planning matter.

2. Interception drainage

- 2.1. The current solution is discharge to a watercourse and the design includes permeable paving, raingardens and basins. Some areas of the site allow shallow infiltration which is likely to be suitable for interception drainage. A calculation is provided which indicates the standard is met by a combination of permeable pavement, basin and raingarden. Clarification of the features included and that they are valid in terms of the areas they serve in accordance with NSfS criteria is now provided and overall exceed the impermeable areas served.
- 2.2. The information provided is sufficient to determine the plan layout and further confirmation (including infiltration rates at shallow depths) can be provided as part of the technical design to discharge Condition 14.

3. Extreme rainfall and flooding

- 3.1. The calculations and parameters used are broadly in accordance with current sustainable drainage policy and guidance.
- 3.2. The additional information provided on the outlet connection to the existing watercourse, together with the surcharge added to the calculations is acceptable and robust.
- 3.3. Base levels and gradients have been added to the drainage layouts and base gradients confirmed, which is acceptable. It is difficult to audit permeable paving in this modelling software from the outputs but we note the permeable pavement storage do not have separate flow controls and are not designed to fill during the design storm, therefore the correct gradient modelled for each compartment is not critical to the feasibility of the design.
- 3.4. Exceedance paths are updated and acceptable subject to technical design of the proposed levels which can be presented at discharge of conditions stage.

4. Water quality

- 4.1. The measures proposed would provide adequate water quality mitigation for the development and the details provided would be acceptable subject to confirmation through technical design, which can be provided at discharge of conditions stage.

5. Amenity

- 5.1. The Drainage Statement does not contain an assessment of the amenity aspect for the sustainable drainage system.
- 5.2. Whilst the planning consent was granted prior to the introduction of the NSfS, the layout was not determined and in accordance with Arun DC guidance there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. However, the scheme includes small scale rainwater harvesting, permeable pavement, raingardens and basins which are included in a landscaping plan. The surface features which provide interception drainage add to amenity provision.
- 5.4. We do not object to the application due to lack of amenity.

6. Biodiversity

- 6.1. No assessment is provided on the biodiversity aspect for the sustainable drainage system. There is no site-specific biodiversity risk and opportunity (BRO) assessment provided. The submitted ecology report does not include sustainable drainage.
- 6.2. Whilst the planning consent was granted prior to the introduction of the NSfS, the layout was not determined and in accordance with Arun DC guidance there should be consideration of this aspect by an Ecologist and incorporation of multifunctional (landscape led) SuDS where feasible.
- 6.3. However, the scheme includes raingardens and basins which are included in a landscaping plan. The surface features which provide interception drainage add to biodiversity provision.
- 6.4. We do not object to the application due to lack of biodiversity delivered through the sustainable drainage system.

7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. A Drainage Maintenance Schedule is submitted which does not currently meet ADC guidance / requirements for details Management and Maintenance Plans. However, a detailed plan can be submitted at discharge of conditions stage. There is a planning condition (C16) which requires a detailed plan to be provided prior to occupation.
- 7.2. Condition 13 (sub parts 8,9,10) require that at reserve matters stage, A plan showing the impact of the proposed development on existing watercourses (where applicable). Details of any necessary permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme. Details of how the drainage scheme shall affect the hydrological conditions of the adjoining ancient woodland such that no loss or deterioration shall occur. The development would not appear to affect the adjacent watercourses other than the outfall connection to the watercourse to the east of the site. From a drainage perspective, the discharge is achievable as the site owner is a Riparian owner of the western bank of the watercourse. The impact on the Ancient Woodland in drainage terms is low, the development will reduce surface water runoff to the woodland. There are some areas of encroachment into the 15 metre buffer zone which is attenuation basin banking. Therefore the Tree Officer and Natural England should be consulted on proposed works within or in proximity to the ancient woodland.

8. Suggested conditions / Overcoming the objection

- 8.1. There are drainage conditions attached to the outline planning consent which require technical design and assessment of the drainage system (C14), a construction phase plan for managing surface water (C15), a detailed Management and Maintenance Plan (C16) and verification of successful implementation (C17). No further planning conditions are required.

Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☐ Landscaping officer (proposed trees and landscaping)
- ☒ **Tree officer (existing trees)**
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)
- ☐ Other: Specify
- ☐ None

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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<https://www1.arun.gov.uk/planning-application-finder>



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 22 September 2026 12:32
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: WA/51/26/RES

Please find enclosed our consultants response.

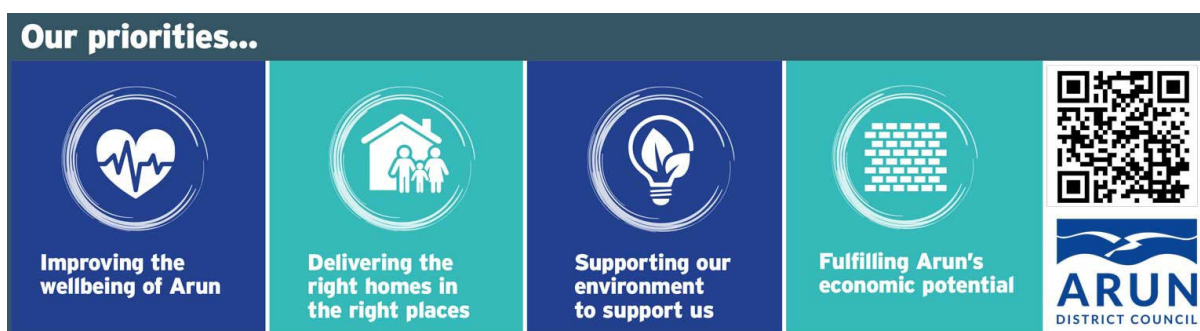
Regards

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 03 September 2026 11:04

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: WA/51/26/RES

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: WA/51/26/RES

Registered: 25th June 2026

Site Address: Land East of Wandleys Lane Fontwell

Grid Reference: 495640 106702

Category: Plan Applicat'n

Description of Works: Approval of reserved matters following the grant of outline planning permission WA/35/23/OUT, for the construction of 95 No. new homes, access, new pedestrian and cycle links, open space, landscaping, habitat creation, drainage features and associated groundworks and infrastructure, including details relating to the Sensitive Lighting Strategy, POS details and Part M Compliance. This application is in CIL Zone 3 and is CIL Liable as new dwellings.

I am able to inform you that I have received an amendment to the above application dated 20th August 2026 relating to:- Amendments made in response to Ecology, Highway and Drainage Comments

If you should wish to make further representations as a result of this amendment, please make any further comment by **18th September 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Mr S Davis

Planning Case Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

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