

Engineers Comments Regarding Surface Water Drainage

Application Reference:	WA/51/26/RES	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Davis	Date of Review:	27/07/2026
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:	1		

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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Compliant	Further Information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Further Information
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	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

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

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.

1. Runoff destination

- 1.1. There does not appear to be any barrier to providing, as a minimum, water butts to each home and this should be shown on the drainage layouts.
- 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. However, there is no infiltration testing present and this is a requirement of Condition 13. There may be potential for a partial infiltration solution or an infiltration solution for a part of the site. A more thorough assessment of infiltration potential and groundwater depths should be included in the current submission.
- 1.3. The proposed runoff destination is similar to the outline strategy, which is to the southeast edge of the site where there is no topographic survey but the drainage layout states: 'existing ditch'. It is not clear whether the existence, connectivity and suitability of the outfall was established at outline planning stage. The applicant should submit evidence in support of this current design to demonstrate feasibility subject to final technical design.
- 1.4. The runoff destination is not currently demonstrated to be in accordance with the requirements of NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. The current solution is discharge to a watercourse and the design includes permeable paving, raingardens and basins. A calculation is provided which indicates the standard is met by a combination of permeable pavement, basin and raingarden. For these features to be 'unlined', the

base would need to be at least 1 metre above high ground water level. Clarification of the features included and that they are valid in terms of the areas they serve in accordance with NSfS criteria should be provided.

2.2. Further information should be provided to demonstrate interception drainage is achieved by the design.

3. Extreme rainfall and flooding

3.1. The calculations and parameters used are broadly in accordance with current sustainable drainage policy and guidance. The following aspects should be clarified or addressed.

3.2. It is not clear whether a downstream surcharge is needed to represent the downstream top water conditions in the receiving watercourse during the design storm.

3.3. The drained area calculations should include the lined basin areas.

3.4. It is not clear from the calculations whether the base gradients for the permeable paving are in accordance with the design. Base levels should be added to the drainage layouts and base gradients confirmed and reflected in the calculations.

3.5. An exceedance path appears to flow towards the Foul Water Pumping Station. Please clarify the levels are designed to divert the flow away from the pumping station compound.

3.6. The design to manage extreme rainfall is not currently demonstrated to be in accordance with the requirements of NSfS Standard 3. Therefore, we **object** to the application.

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.

5. Amenity

5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on 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. It is noted that surface features are proposed including basins and raingardens and an assessment of the design in terms of maximising opportunity on the site would assist in assessing this aspect.

6. Biodiversity

6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.

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. It is noted that surface features are proposed including basins and raingardens and an assessment of the design in terms of maximising opportunity on the site would assist in assessing this aspect.

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

7.1. There is no management and maintenance plan submitted with the detailed drainage strategy. However, there is a planning condition (C16) which requires a detailed plan to be provided prior to occupation. A draft or outline plan setting out ownership and how the maintenance will be managed should be provided with the reserve matters submission to set key parameters for the detailed

maintenance plan and demonstrate the design can be effectively maintained for the lifespan of the development.

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. This information should be clarified to ensure the solution is feasible and can be constructed without detriment to the environment. The Tree Officer and Natural England should be consulted on proposed works within or in proximity to the woodland.

7.3. The design and assessment has not currently demonstrated to be in accordance with the requirements of NSfS Standard 7. Therefore, we **object** to the application.

8. Suggested conditions / Overcoming the objection

8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

8.2. The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.

8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

Drainage Impact on Other Planning Matters

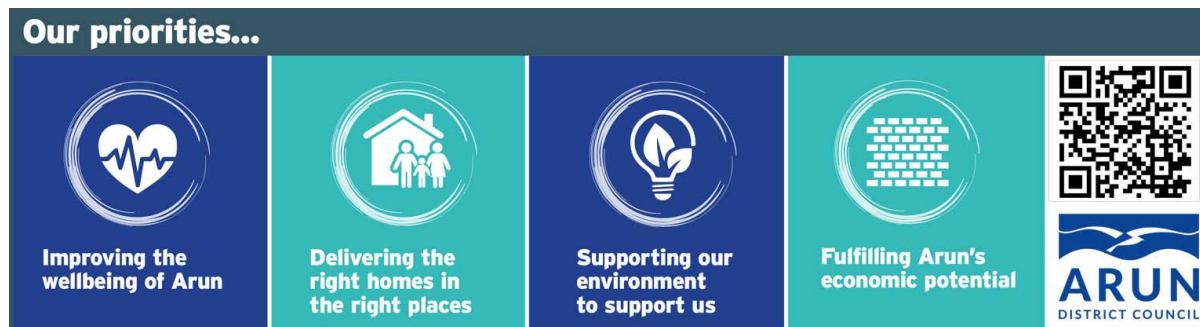
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

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



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

Sent: 07 July 2026 15:03

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

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

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

The Town & Country Planning Act 1990 (as amended)

Town & country Planning (Development Management Procedure) (England) Order 2015 - Article 6

Approval of Reserved Matters Following Outline Approval

Application No: WA/51/26/RES

Registered: 25th June 2026

Site Address: Land East of Wandleys Lane Fontwell

Grid Reference: 495640 106702

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.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for onsite mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with

by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 30th July 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider
<https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Mr S Davis

Planning Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLCONSULT (ODB) 2020