

Application Reference: WA/68/26/PL

Objection Concerning: Surface Water Drainage, Flood Risk, and Application Inaccuracies

Location: The Greenway , West Walberton Lane, BN18 0QS

Dear Case Officer Hebe Smith ADC Drainage Engineers, and Lead Local Flood Authority (LLFA)
Reviewer, WSCC, **(Case Officer, PLEASE FORWARD AS APPROPRIATE)**

(Addendum to my previous comments)

I am writing to log a formal **objection** to the above application. Having reviewed the submitted Flood Risk Assessment (FRA) and Drainage Strategy, there are severe, fundamental flaws, mathematical discrepancies, and impossible data entries that render the current drainage submission entirely invalid.

I request that this application be refused, and if the applicant re-applies that a completely new, verified, audited drainage strategy is provided, based on the following grounds:

1. Serious Discrepancies in Plot Area Calculations

The main planning application states the site area is **0.49 Hectares**, yet the (page 57) of FRA and drainage calculations artificially inflate this to **0.556 Hectares**. This discrepancy of over 600m² skews the runoff models, making the plot appear mathematically more capable of handling runoff than it is in reality. **This is a serious drainage issue**. An application cannot legally be determined flitting site boundaries and inflated land masses to pass drainage models. Please REFUSE this application.

2. Explicit Incompatibility with Arun Local Plan Policy W DM1 (Lidsey Catchment Area)

The site sits directly within the hyper-sensitive **Lidsey Wastewater Treatment Works (WwTW) Catchment Area**. Under **Policy W DM1 of the Arun Local Plan**, the council recognizes the severe historical issues with local groundwater infiltration compromising the foul sewerage network. Under Arun's strict planning criteria, any development in this catchment zone **must fully demonstrate ground viability prior to determination**.

Because the applicant has provided a flawed FRA (see 1), they have entirely failed to satisfy the council's **Supplementary Requirements for Surface Water Drainage** and the **Lidsey Surface Water Management Plan (SWMP)**.

3. Impossible Winter Water Table Monitoring Data

The FRA claims to provide winter groundwater monitoring data for two boreholes, citing a water table of 1.8 metres below ground level (mbgl). However, the dates listed for multiple monitoring entries are specified as **November and December 2026**. Given that the current date is September 2026, it is physically impossible for this data to have been collected. **(FRA document page 44, note the dates on both holes, measurements, claimed 7/11/26, 20/11/26, 12/12/26, for both Bore Holes)**

Because the applicant has submitted speculative or fabricated future data for a critical environmental safety metric, the FRA must be rejected. Given the hyper-sensitive nature of the Lidsey WwTW Catchment Area, groundwater data must be flawless. I request that the council **REFUSE** this multiply flawed application, and if the applicant decides to resubmit in the future, to mandate a full, independently witnessed groundwater monitoring program to be **re-run over the upcoming Winter 2026/2027 period** before that application can be determined..

4. Non-Compliant 'Unsaturated Buffer Zone' (BRE Digest 365 & Building Regulations Part H)

Even taking their highly dubious 1.8 mbgl water table claim at face value (odd, as a higher table of 1.7mbgl was found on the approx 1m higher land at adjoining Daffodil gardens 2 years ago, in a less wet winter), the applicant proposes a **soakaway depth of 1.0m**. This eaves a dry clearance buffer of **just 0.8m** between the base of the soakaway and the water table they claim of 1.8 mbgl. This directly violates the mandatory **1-metre unsaturated zone clearance** required under **BRE Digest 365** and **Building Regulations Part H**.

During seasonal peaks, the soakaway will sit within what should be the unsaturated zone, should be clear of the water table, instead being sitting too close to underground water so causing rapid failure and overflow. As there is no watercourse, and no public storm sewer connection permitted in Lidsey catchment, a failed infiltration system will cause severe surface water runoff onto my adjacent property. I note they have PS2, Ps4, and PS6 at various places in the site, described as e.g. "Outfall Manhole PS", 'Free Discharge', which means discharging into the environment. Whilst the flawed calculation shows these 'stopcocks' as being closed, when this drainage is recalculated for the true site size, (see 1.) these stopcocks will need to be open, and draining water overland indirectly into surrounding properties' gardens. This is NOT acceptable in already high water table areas. (see below) Please REFUSE this application.

I have attached photographic evidence of my own vehicle suffering severe ground failure ("bellying") on my property boundary, proving the local soil is already subject to extreme seasonal saturation. Please see below. Photograph Timed: 26-01-2026

Conclusions

The drainage strategy as submitted is mathematically flawed, physically non-compliant with BRE 365 buffer rules, and relies on impossible future dating. I strongly urge the Planning Authority and Council Drainage Officers to reject these calculations. There are so many incorrect, incomplete, inaccurate, inconsistent, and impossible claimed readings, double statements, and wrong calculations, that I must urge the Council to **REFUSE** this application.

When the applicant has then had time to:-

- a) re-measure the site and decide one size only that it actually is;
- b) make all new drainage calculations based on the true size of the plot;
- c) take all new water percolation readings, at correct legal 0.8m pit depths, and
- d) take all new water table readings, over the correct period, in real time not future dates,

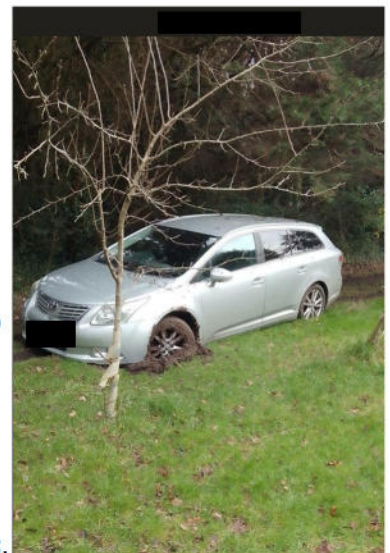
they may decide to make a fully audited, verified resubmission rather than this dangerous shambles..

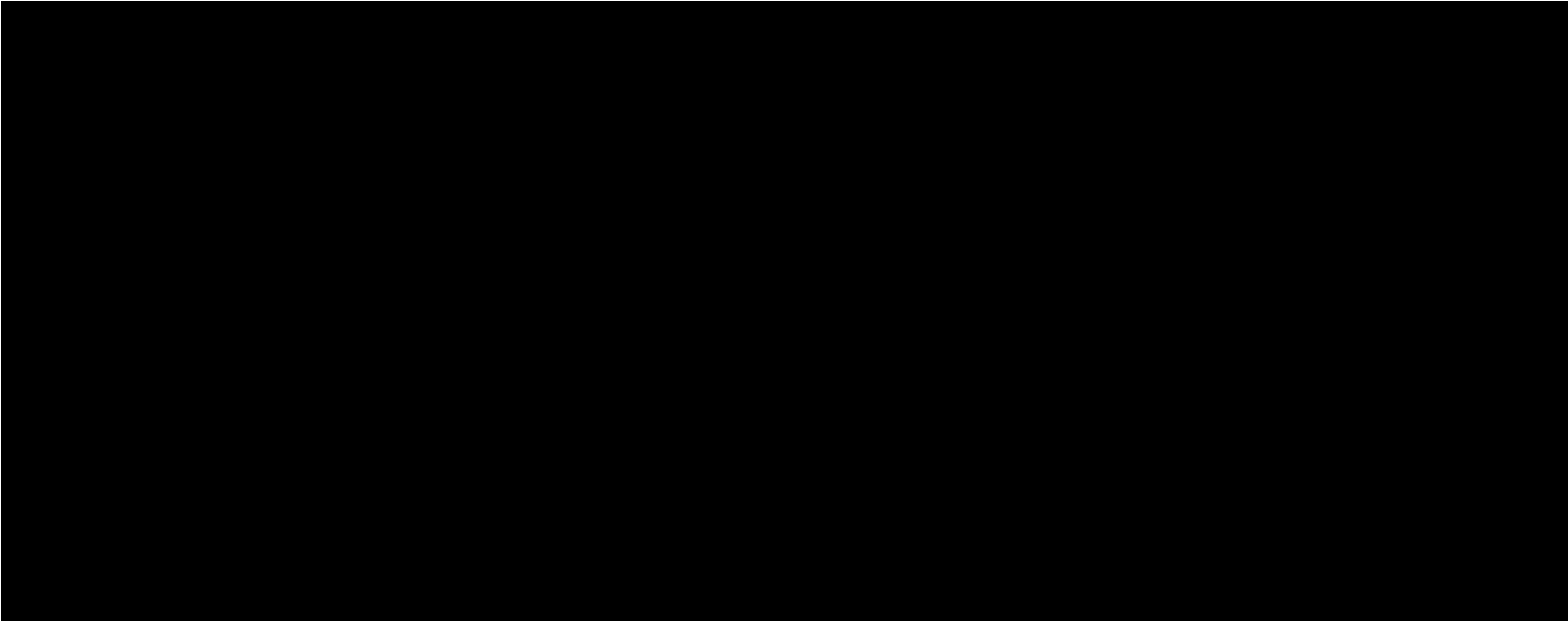
Please REFUSE this application.

Yours sincerely,

Paul Fisher

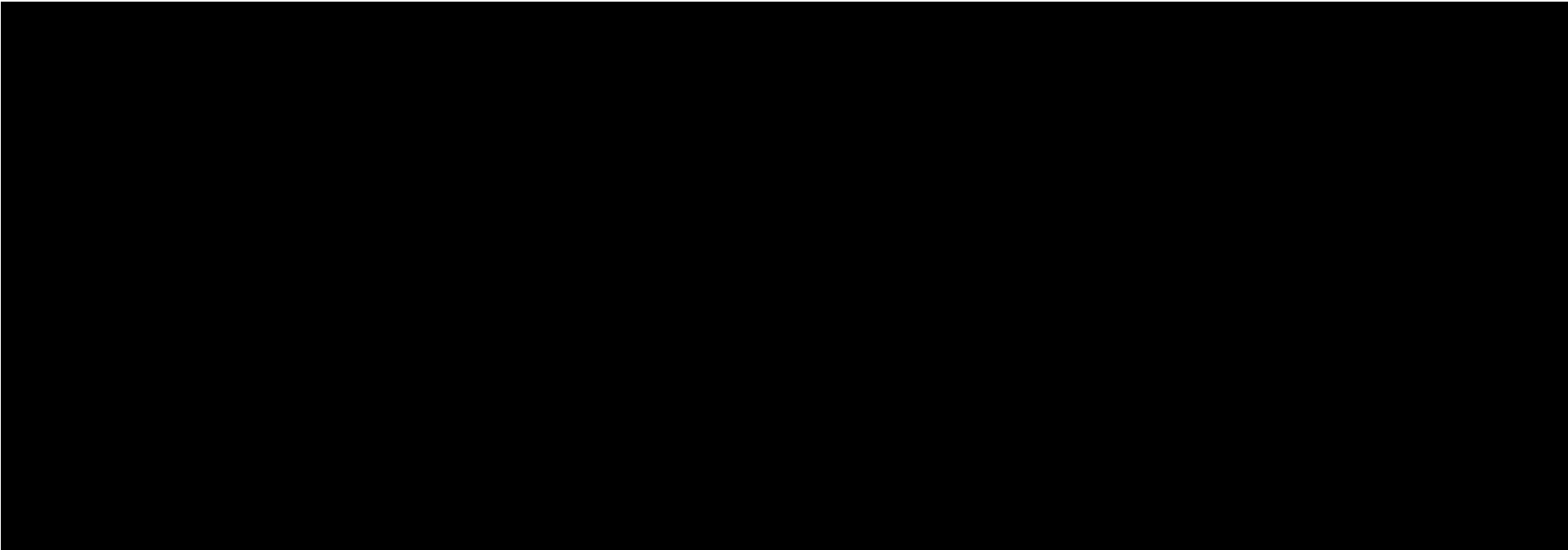
Gracelands Farmhouse, Arundel Road, BN18 0QP





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Our priorities...



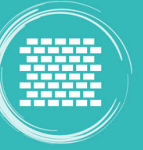
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 18 September 2026 13:13
To: Hebe Smith <Hebe.Smith@arun.gov.uk>
Cc: Joe Dixon <Joe.Dixon@arun.gov.uk>; Andy French [REDACTED]
Subject: FW: Serious drainage concerns on WA-68-26-P
Importance: High

Hi Hebe

See below/attached.

Can you advise how you wish to deal with this. We sent our consultants response to planning yesterday as you are no doubt aware.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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Littlehampton, West Sussex, BN17 5LF
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Delivering the right homes in the right places

Supporting our environment to support us

Fulfilling Arun's economic potential

From: [REDACTED]
Sent: 18 September 2026 13:07
To: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: Serious drainage concerns on WA-68-26-P

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Dear Mr Cann

My apologies for contacting you direct, but I realise I have submitted this objection information very late to Arun Planning, and worry it may not reach you in time. I do feel it is very relevant as it dhowes serious faults in the drainage system, which will need to be re-calculated as the site size is not 0.556Ha as used in calcs, it is 0.49Ha per the application form. Also, the applicant's water table calculations show there is only 0.8m unsaturated zone under the 1m depth soakaways. The soakaway pits have been dug at 1m and 1.05m depth, too deep for only 0.8m dry zone. The soil infiltration rate tests are therefore also invalid.

Best wishes

Paul Fisher CEng