

LLFA Response Statement

Location: Sunnymeade, Yapton



LLFA Ref:	ADC/ETX4b	Date:	19 th June 2026
Application Number:	Y/24/26/PL	CGS Ref:	C1002

To: Amber Willard

Re: Sunnymeade, Yapton

This document provides a formal response to the LLFA comments dated 4th June 2026 relating to the discharge of Y/24/26/PL as part of the planning application referenced above.

LLFA Comments and Responses

LLFA Comment	Our Response
0. <u>General</u> 0.1. There is a significant area of surface water flood risk on this site, and no site-specific flood risk assessment has been submitted. The site (red line boundary) is currently 'undeveloped', and this application will introduce a more vulnerable use. Given the surface water flood risk on the site, and the use that is proposed, a site-specific flood risk assessment is required (in accordance with paragraph 181 and footnote 63 of the NPPF and the validation requirements of Arun District Council). In the absence of one, we <u>object in principle</u> to the application. Areas of flood risk also need to be considered as part of the drainage strategy for the site.	A site-specific flood risk assessment has now been undertaken which has established the surface water flood risk extents and proposed a suitable compensation strategy
0.2. It is noted that some of the works described within the application are already constructed. This includes	This has been noted and discussed with the client. The current works and cabin will have negligible effect on the flood risk but if any works on site are deemed as being required then these will be undertaken to the satisfaction of Arun District Council.

works to the access of the site which may have altered the levels and increased flood risk. Furthermore, one of the cabins is already in situ on the site, the drainage of which is uncertain. Further works may be required to elements which have already been constructed to ensure that flood risk is not increased.	
1. <u>Runoff destination</u> 1.1. The designer has proposed a combination of rainwater reuse and infiltration techniques to dispose of rainwater, the latter supported by winter groundwater monitoring and infiltration testing demonstrating viability. The proposed methods are acceptable and in accordance with the hierarchy for sustainable drainage.	Noted. Thank you.
2. <u>Interception drainage</u> 2.1. Interception is delivered via rainwater harvesting and infiltration – ensuring that runoff from most frequent events does not leave the site. This complies with the relevant standard.	Noted. Thank you.
3. <u>Extreme rainfall and flooding</u> 3.1. ADC have published guidance relating to the use of SuDS in flood areas (https://www.arun.gov.uk/suds-in-flood-areas). This states that: <i>“SuDS will only be considered in Flood Areas where the site is entirely within those Areas. On all other sites, all SuDS storage features must be located within Flood Zone 1 and outside of any area of surface water flood risk. It is expected that the layout of a proposed development is</i>	An updated and more detailed compensation proposal has been put forward which caters for the isolated surface water flood volumes. The compensation area generally extends to a depression surrounding the parking area with the parking area also allowed to flood temporarily with safe access still maintained. The drainage strategy has been subsequently updated to reconfigure each soakaway so that it is located outside of the flood zone and therefore would be unaffected should a flood event ever occur The permeable parking area, whilst located within the flood extent, would provide temporary flood storage as flood waters dissipate. As an isolated, self-draining structure incorporating a voided sub-base, it would not increase flood risk or displace flood flows but instead provide additional storage capacity to help mitigate flooding. The accompanying flood compensation

<i>designed with this in mind.” (My emphasis)</i> 3.2. The proposed drainage strategy includes no reference to the surface water flood risk of the site and appears to position all storage features within areas of flood risk, despite parts of the site being at lower risk. By placing storage and infiltrating features in areas of flood risk there is an increased risk that features can be inundated by flood water prior to runoff entering them, rendering them ineffective and thus increasing flood risk. 3.3. Furthermore, the proposed flood storage compensation plan does not follow the level-for-level and volume-for-volume method. As a result, a hydraulic connection between the highway and the applicant land is altered and flood risk will be increased. 3.4. The inadequate consideration of flood risk on the site results in an <u>objection in principle</u> to the application in relation to this standard.	assessment demonstrates that the development does not result in any increase in flood risk on or off site and maintains the required flood storage volume. The proposals therefore demonstrate a net improvement in flood management over the current site arrangement. Flood compensation plans and details indicating level for level and volume for volume flood compensation are included.
4. <u>Water quality</u> The application includes a water treatment assessment which conforms to the simple index approach suggested by The SuDS Manual. The water treatment suggested is appropriate	Noted. Thank you.
5. <u>Amenity</u> 5.1. Multifunctionality is offered with the rainwater harvesting tanks (collection and supply) and the permeable paving which operates as a parking surface and water treatment and storage. The surface water drainage does not improve	Noted. Thank you.

placemaking, but it is acknowledged that opportunities for this are limited by the scale of the site and the flood risk on it. There is no objection to the application on the grounds of amenity.	
6. <u>Biodiversity</u> 6.1. The drainage strategy does not include a BRO assessment and there does not appear to be any features include which provide biodiversity benefit. The designer cross references the bio-diversity net gain statement and indicates that biodiversity benefit will be delivered by other means on the site. The inclusion of SuDS features which provide biodiversity benefit may impact the scale and layout of the site and therefore we object to the application in relation to this standard.	A BNG report has been prepared as part of the application by others which confirms offsite offsetting works to achieve BNG. In order to achieve biodiversity benefits on a SuDS basis, each rainwater downpipe (2 per chalet) will now discharge into the soakaway via a bio-retention planter which will provide adequate biodiversity benefits proportionate to the scale of the site.
7. <u>Construction, operation, maintenance, decommissioning and structural integrity</u> 7.1. There are no trees on the site which are likely to impact the proposed drainage strategy. The application includes a basic maintenance manual which may be improved via conditions applied to a planning permission. Further details regarding construction and structural integrity of the system may be agreed via conditions.	Noted. We can prepare a more detailed report at condition stage.

Appendices

- Updated Drainage Report
- Flood Risk Assessment

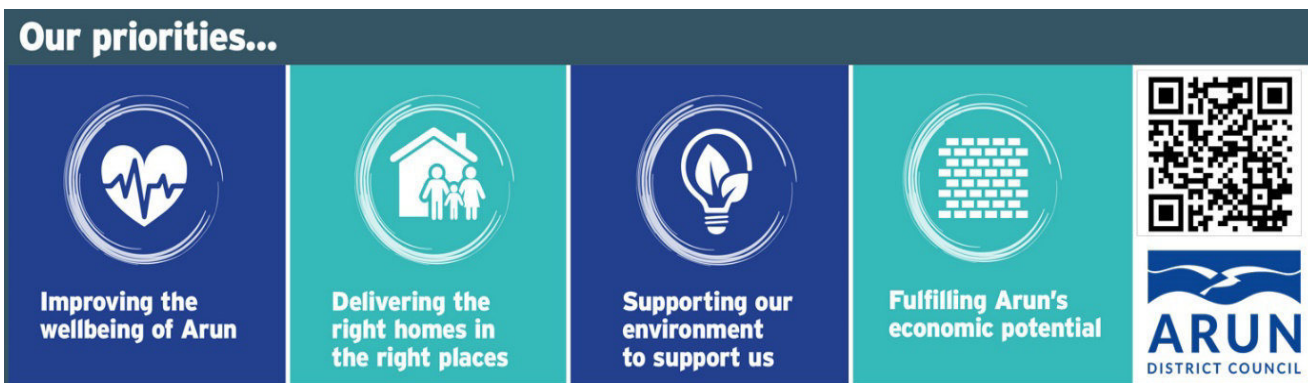
From: Amber Willard
Sent: 22 June 2026 12:06
To: Planning Scanning
Subject: FW: y/24/26/pl
Attachments: CGS_LLFA_Response_A.pdf

Amber Willard MRTPI
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From: cheryl wellstead
Sent: 22 June 2026 11:57
To: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: Re: y/24/26/pl

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Good afternoon Amber,

Please see attached a response from our drainage engineer, he has added some additional notes, if you could forward this on to your drainage team it would be appreciated.

Cheryl Wellstead-Clarke



Ashcombe House
Green Lane
Hambleton
Waterlooville
Hampshire
PO7 4SX

From: cheryl wellstead
Sent: 19 June 2026 18:13
To: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: Re: y/24/26/pl

Good evening Amber,

Please find attached the finalised FRA, Drainage and SUDS report together with a detailed response to the holding objections, I trust this will satisfy the drainage consultants.

Cheryl Wellstead-Clarke



Ashcombe House
Green Lane
Hambledon
Waterlooville
Hampshire
PO7 4SX

[REDACTED]

From: cheryl wellstead [REDACTED]
Sent: 18 June 2026 14:14
To: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: Re: y/24/26/pl

Good afternoon Amber,

Please can you disregard the FRA I sent over earlier today, our drainage engineer needs to add in some additional data, the updated FRA and written response will both be sent to you tomorrow.

Cheryl Wellstead-Clarke



Ashcombe House
Green Lane
Hambledon
Waterlooville
Hampshire
PO7 4SX

[REDACTED]

From: cheryl wellstead [REDACTED]
Sent: 18 June 2026 11:12
To: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: Re: y/24/26/pl

Good morning Amber,

Please see attached the FRA, in addition our drainage engineer will have a detailed response to each point raised by your drainage team.

Cheryl Wellstead-Clarke



Ashcombe House
Green Lane
Hambledon
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Hampshire
PO7 4SX

[REDACTED]

From: Amber Willard <Amber.Willard@arun.gov.uk>
Sent: 16 June 2026 16:04
To: cheryl wellstead [REDACTED]
Subject: y/24/26/pl

Dear Mrs Wellstead-Clarke

Y/24/26/PL at Sunnymead

I have discussed this application with my manager and as there is an outstanding objection from drainage we will be looking to refuse the application. I note you advised you would address the comments, however as the issues are the same as that which were previously raised in an earlier application, I am advised we wouldn't delay the application to await further information. Even if you were to provide additional information to address their comment in the next day or so, it would be highly unlikely we would get a 2nd response from drainage before the application expired on the 26th June.

As a result, I recommend that you withdraw the application.

Please let me know how you wish to proceed.

Thanks

Amber Willard MRTPI
Principal Planning Officer, Planning Department

E: amber.willard@arun.gov.uk

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