

Engineers Comments Regarding Surface Water Drainage

Application Reference:	A/30/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	04/06/2026
Site Name:	Highdown Garden Centre Littlehampton Road Ferring BN12 6PG		
Application Description:	Demolition of existing open sided structures and erection of retail canopies and restaurant lobby. This application is in CIL Zone 3 (Zero Rated) as other development.		
Assessment Number:	3		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

Reviewed Plans

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

- Surface Water Calculations
- Greenfield Runoff Rate
- Engineers (applicants) response
- Engineers comments
- Engineers response
- Drainage Comments from Agent - cover email
- Drainage Comments from Agent

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. We have reviewed the additional information and comments submitted 30 March.
- 0.2. We note the LLFA objection dated 31 March.
- 0.3. There are changes to onsite drainage and new drained roof areas which affect drainage on and around the site and therefore requires sustainable drainage in accordance with Para 182 NPPF. This does not only apply to major development.
- 0.4. The Drainage Strategy email dated 30 March does not meet ADC guidance, further comments in the subheadings below. The Drainage Layout (A9803 - 140 P0) which contains some information but does not meet our standards for presentation and assessment of sustainable drainage. A Drainage statement should be submitted following guidance on ADC webpages - <https://www.arun.gov.uk/surfacewater>.
- 0.5. Typically intrusive ground investigation is required to confirm whether infiltration or a partial infiltration solution is possible. This may not be necessary if the available evidence from desk study is compelling. However, no desktop study or ground investigation has been submitted which provides an appraisal of the local hydrogeology. The drainage strategy email dated 30 March states there is a 4.6m clay cap but no evidence was provided in support. We were awaiting an evidenced desktop appraisal to support the selection of a piped discharge over the higher priority of discharge to ground. A single borehole log has now been submitted within email text without the full ground investigation report and shows a layer of gravelly clay (with silty sand horizons) between 1.2m and 3.5m deep which may have infiltration potential depending upon groundwater levels.
- 0.6. The area within the site boundary is not at significant risk of flooding from external sources according to our flood risk datasets and a Flood Risk Assessment should not be required.
- 0.7. However, it should be noted that Hangleton Lane suffers significant flooding due to inadequacies in the watercourse network and overland flows onto the road. We are currently working with WSCC Highways on a potential scheme to help alleviate the flooding. There may be offsite works required to be undertaken by the Applicant to watercourses within their land ownership. This can be dealt with via a planning condition once the onsite design is acceptable.

1. Runoff destination

- 1.1. The proposed drainage layout shows a piped restricted outlet to the existing drainage system at the site. The downstream outfall is unclear on the plans but there is a piped ordinary watercourse shown on our records in the location.
- 1.2. There will be a significant irrigation demand at the site and collection of rainwater for reuse is a higher priority than discharge to piped surface water drainage system. Rainwater harvesting should be incorporated into the design in accordance with NSfS Standard 1. Arguments made to assert it is not feasible to incorporate any amount of rainwater harvesting are not acceptable and some reuse of rainwater should be incorporated.
- 1.3. The submission does not currently provide evidence of the ground conditions described in the drainage strategy email. Infiltration to ground is a higher priority than discharge to discharge to piped surface water drainage system. Evidence should be provided that infiltration to ground would not be suitable based upon either low infiltration rates or high groundwater. This may be based upon reliable local geology information and/or information in the public domain on adjacent sites, or new ground investigation.
- 1.4. If discharge to ground is not viable and connection to discharge to a piped surface water drainage system is required, the downstream connectivity should be evidenced in the submission.

1.5. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage

2.1. Interception drainage is not currently incorporated into the design and is a requirement of sustainable drainage design.

2.2. Evidence has not been provided to justify the lack of interception drainage provided as part of the sustainable drainage design. Inception drainage is not currently in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

3.1. We have reviewed the revised calculations dated 8 May 2026. The drained area in the calculations does not equal the area used for greenfield runoff calculations. A drained areas plan has not been submitted.

3.2. The proposed design peak discharge rate is over 5 times the calculated 50% AEP greenfield rate but within 5 times 3l/s/ha and is therefore acceptable subject to confirmation of drained area.

3.3. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

4.1. Water quality mitigation is not currently incorporated into the design.

4.2. The runoff should be assessed against the Simple Index Approach within the SuDS Manual or similar method. There are no trafficked areas shown on the layout and measures to mitigate runoff from roof areas and paths are likely to be able to be integrated at technical design stage.

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. Due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an exception to Standard 5 is allowable.

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. Due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and an exception to Standard 6 is allowable.

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

7.1. A maintenance plan for the drainage system has not been submitted but the site is within a single ownership and management and this aspect can be the subject of a planning condition.

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

PL- Consultation- Engineers response



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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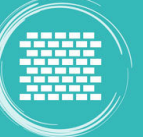
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 05 June 2026 09:20
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: A/30/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

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



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 26 May 2026 12:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: A/30/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	A/30/26/PL
Registered:	2nd March 2026
Site Address:	Highdown Garden Centre Littlehampton Road Ferring BN12 6PG
Grid Reference:	509653 103743
Category:	Plan Applicat'n
Description of Works:	Demolition of existing open sided structures and erection of retail canopies and restaurant lobby. This application is in CIL Zone 3 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 19th May 2026 relating to:- Substitute and supplementary drainage documents

If you should wish to make further representations as a result of this amendment, please make any further comment by **17th June 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

Kathryn Welch

Planning Case Officer- Arun District Council

Telephone: 01903 737789

Email: kathryn.welch@arun.gov.uk

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