

Engineers Comments Regarding Surface Water Drainage

Application Reference:	A/30/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	07/04/2026
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:	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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:

- Documents uploaded on 09-03-26
- PO/Agent comments regarding SUDS
- SUPPORTING STATEMENT

Consultation comments to the planning officer

0. General

- 0.1. 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.
- 0.2. No drainage statement is submitted to accompany the application. There is a 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>.
- 0.3. The area within the site boundary is not at significant risk of flooding from external sources and a Flood Risk Assessment should not be required.

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 but there is a piped ordinary watercourse shown on out 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.
- 1.3. Infiltration to ground is a higher priority than discharge to piped surface water drainage system. Some evidence should be provided that infiltration to ground would not be suitable based upon either low infiltration rates or high groundwater. This can be based upon reliable local geology information and/or information in the public domain on nearby locations and not necessarily require new onsite 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.
- 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.
- 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. The drainage layout shows flow restriction and below ground attenuation. The design peak flow rate should be assessed against greenfield runoff rates and calculations should be provided within a Drainage Statement.
- 3.2. Guidance is provided on ADC webpages - <https://www.arun.gov.uk/surfacewater>.
- 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 is 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

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ARUN
DISTRICT COUNCIL

From: Paul Cann <Paul.Cann@arun.gov.uk>

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.

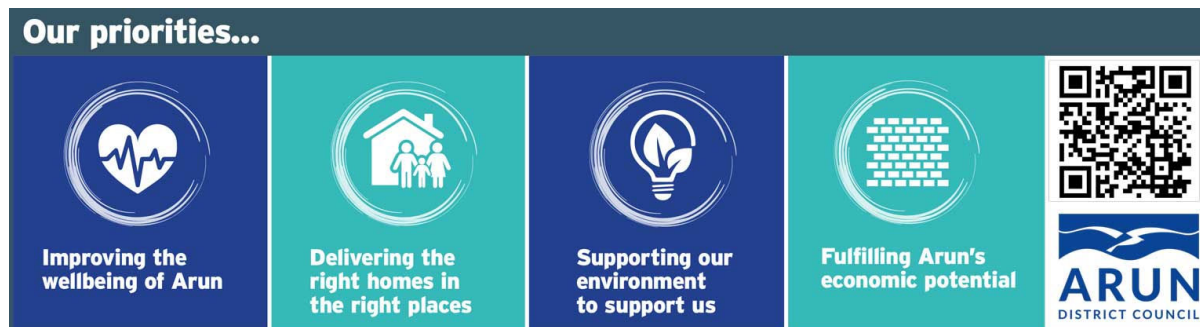
Regards

Paul Cann

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

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

Sent: 11 March 2026 10:49

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 & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: A/30/26/PL

Registered: 2nd March 2026

Site Address: Highdown Garden Centre Littlehampton Road Ferring BN12 6PG

Grid Reference: 509653 103743

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.

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.

Should you have any comments to make, these should be sent by replying to this email by 11th April 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

Kathryn Welch

Planning Officer- Arun District Council

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