

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FG/101/25/PL	Reviewer Reference:	ADC/KW/SB
Planning Officer:	Harry Chalk	Date of Review:	20/10/25
Site Name:	4 South Drive, Ferring, BN12 5QS		
Application Description:	Erection of replacement dwelling together with reprofiling of the site and installation of new boundary to front of site.		
Assessment Number:	1 of 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection subject to conditions
5. Amenity	Insufficient	No objection subject to conditions
6. Biodiversity	Insufficient	No objection subject to conditions
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:

Flood Risk Assessment and Surface Water Drainage Strategy ADG7845_BN12_Ferring_01

Consultation comments to the planning officer

0. General

Insufficient information regarding surface water drainage has been submitted to evidence that flood risk will not be increased as due to the proposed development.

1. Runoff destination

A desktop study undertaken by the applicant's drainage consultants indicates that, due to the underlying chalk bedrock, there is a potential risk of dissolution features. Consequently, infiltration testing has been deemed unviable by the consultant. Infiltration within a 10-metre easement of a dissolution feature has also been ruled out, based on assumed high groundwater levels. It has further been indicated that no surface water bodies, or surface water sewers are present on or near the site. Therefore, discharge to

the foul sewer is presented as the only viable option. The existing site is reported to positively drain to the foul sewer, and with appropriate attenuation and restricted discharge rates, the proposal is stated to represent a betterment of the current situation.

The applicant is reminded that the National Standards for Sustainable Drainage System (NSfS) does not recognise the foul water sewer as a priority option. Therefore, **surface water must not be discharged into the foul sewer**. It is important to recognise that combined sewers are intentionally designed to take both foul and surface water runoff. Even if the foul sewer has the capacity to accommodate additional flows or has an element of surface water already in it, it is not considered combined.

Insufficient evidence has been provided to substantiate the ground conditions, the presence and risk of dissolution features (for example a dissolution risk assessment), groundwater levels, or the existing surface water drainage. Infiltration testing has also not been undertaken. It is the responsibility of the applicant or their drainage designer to supply this evidence. Without it, we are unable to verify the accuracy of the assertions made or assess whether the proposed development would increase flood risk. Caution is also advised with any claims of betterment, as without evidence of the existing drainage of the site, any claim of betterment is unjustified.

For these reasons, we object in principle to the proposal. The submission of the required evidence may also have implications for the scale and layout of the development. The designer has not exhaustively investigated and ruled out all disposal options before suggesting one which is not sustainable or recognised by the SuDS hierarchy.

To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of 1 metre of unsaturated ground can be maintained between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential in Ferring are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.

Standard 1 of the NSfS prioritised the following sustainable means of draining a site, we have summarised the constraints of this site against each priority option:

1. Water reuse – water butts proposed but will not provide a full design solution and can be secured via condition.
2. Infiltration – not adequately investigated.
2. To a watercourse – none available.
3. To a surface water sewer – none available.
4. To a highway drainage system – none available according to our records.
5. To a combined sewer – none available.

It is essential that each discharge destination is considered in strict priority order, with higher priority options fully explored and demonstrably exhausted before progressing to lower priority alternatives. Robust evidence must be provided to discount a higher priority destination.

It is demonstrated that if infiltration is later found not to be viable, then the applicant has not submitted, and we are not aware of, a compliant alternative disposal destination for surface water.

2. Interception drainage

The applicant has proposed water butts but no information have been provided regarding the hard surfaces on site, it may be that they could allow infiltration to the ground. In recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.

- infiltration features designed to meet extreme rainfall standards.
- water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
- raingardens and bioretention features attached to all new downpipes.
- permeable surfacing.

These features will not affect the scale or layout of development and as such can be secured by condition.

3. Extreme rainfall and flooding

The site is currently located within Flood Risk Zone 3a, indicating a high probability of flooding. Flood Zone 3b is defined as the extent of flooding in the 3.33% AEP event, and typically referred to as the function flood plain. At the time of writing modelling data for this event has not been published to cover this area. The models that are available, are for the 1.3% AEP (less likely) and the 5% AEP (more likely) events. The site is within the extents of the 1.3% AEP flood event, which is the more conservative and therefore arguably more appropriate model to assess in the absence of the correct one. This is important as there is a risk that the site may be at risk in the 3.33% AEP event and therefore should not be developed unless it is essential infrastructure or water compatible development.

The submitted Flood Risk Assessment (FRA) has not, and likely cannot provide robust or accurate hydraulic modelling to demonstrate the site's flood risk during the 3.3% AEP event. Furthermore, the FRA assumes that the site is at risk of tidal flooding, yet this assumption has not been substantiated with appropriate evidence. Should it be demonstrated that the site is solely at risk of tidal flooding, the implementation of SuDS would remain a viable design option.

In relation to surface water drainage, the submitted strategy includes the existing brownfield runoff rates and proposes a discharge rate of 1.2l/s from the site. However, Standard 3 of the NSfS does not require a comparison with the existing brownfield rate. Instead, it stipulates that the proposed discharge rate is restricted to the greenfield 50% AEP equivalent (QBAR) or a minimum of 3l/s/h; whichever is greater. Where a site has been previously developed a relaxation factor of up to 5 times may be applied to this rate. As a greenfield runoff analysis or a compliant calculation based on 3l/s/ha has not been submitted, compliance with this standard cannot be determined. On this basis, an objection to the proposal is raised.

This risk of flooding will need to be accounted for by the surface water drainage design. For further guidance, please refer to our *SuDS in Flood Areas* document available online at www.arun.gov.uk/surfacewater.

At present insufficient detail has been included on the drainage plans submitted for engineering assessment. In the absence of this evidence, and without accurate understanding of the existing site

drainage, we cannot assess if flood risk will be increased by the surface water drainage of the proposed development. Therefore, this application does not accord with the NPPF as set out above.

The submitted modelling has not been fully assessed due to the critical and fundamental objection relating to the disposal location.

4. Water quality

Insufficient evidence of water quality benefits has been provided, and as such, Standard 4 of the NSfS has not been met. However, the submission of this evidence is unlikely to affect the scale or layout of the development. Therefore, we do not object to the proposal on these grounds, subject to a condition securing the provision of details demonstrating water quality benefits.

5. Amenity

Insufficient amenity benefits arising from the proposed SuDS have been identified, and therefore Standard 5 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

Insufficient biodiversity benefits arising from the proposed SuDS have been identified, and therefore Standard 6 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of biodiversity benefits.

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

Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. However, in the absence of significant existing trees which could impact the scale and layout and location of SuDS features, most elements of this standard can normally be secured via condition. The submission of a Management and Maintenance Plan is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing the detailed surface water drainage design.

8. Overcoming the objection

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.

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.

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.

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
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www.arun.gov.uk

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<https://www1.arun.gov.uk/planning-application-finder>



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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 20 October 2025 09:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: FG/101/25/PL

Please find attached the consultation response from the engineers to upload; an objection.

Many thanks,

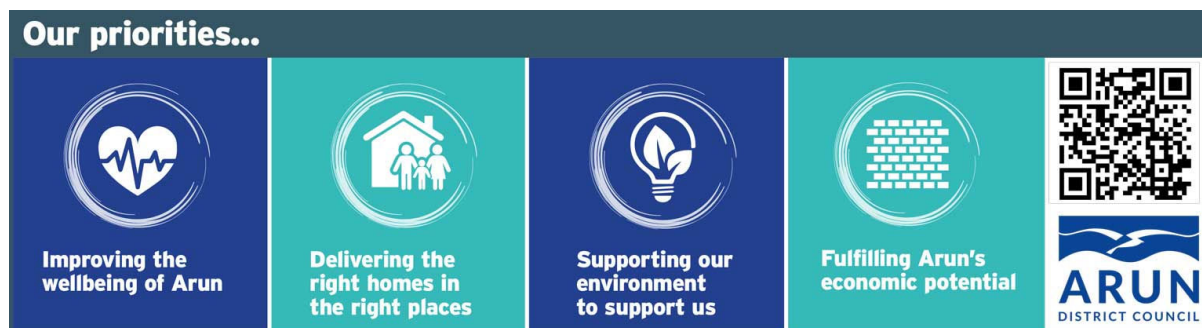
Kathryn Welch
Senior Planning Officer, Planning Department

Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

T: 01903 737789

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

Sent: 12 August 2025 12:03

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

Subject: Planning Consultation on: FG/101/25/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: FG/101/25/PL

Registered: 12th August 2025

Site Address: 4 South Drive Ferring BN12 5QS

Grid Reference: 509406 101633

Description of Works: Erection of replacement dwelling together with reprofiling of the site and installation of new boundary to front of site. This application is in CIL Zone 4 and is CIL Liable as a new dwelling.

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 12th September 2025 . 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

Harry Chalk

Planning Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk

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