

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FG/51/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	14/09/2026
Site Name:	Ferring Country Centre And Riding Stables Rife Way Ferring BN12 5JZ		
Application Description:	Extension to the car parking area and a new building containing retail floor space. This application affect a Public Right of Way and is in CIL Zone 5 (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 (Chapter 18). 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further information
5. Amenity	Insufficient	Further information
6. Biodiversity	Insufficient	Further information
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Further information

Reviewed Plans

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

- FRA

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 note there is a separate application associated with the Centre for an overflow car park, FG/76/26/PL, which is on separate land on the opposite bank of the Ferring Rife.

- 0.2. The application is for an extension to the car parking area and a new building containing retail floor space. The development will affect drainage on and around the site and therefore is required by NPPF Section F8 to incorporate sustainable drainage. The site area is over one hectare and the development is therefore classified as major development.
- 0.3. The submitted Flood Risk Assessment [FRA] contains limited information on the proposed drainage system and a Drainage Statement should be provided to confirm compliance with the seven standards within the Defra National Standards for Sustainable Drainage Systems. Guidance is provided on Arun DC webpages, here: <https://www.arun.gov.uk/suds-general-design-guidance>.
- 0.4. The development site is adjacent to the Ferring Rife main river and parts of the site are within a future flood risk zone. The Environment Agency will provide advice on flood risk from rivers and seas.
- 0.5. There are isolated areas within the site at risk of flooding from surface water which is are not a significant flood risk concern in terms of risk to the proposed use and may be removed through the introduction of a sustainable drainage system.

1. Runoff destination

- 1.1. There may be a water demand at the site for irrigation and potentially drinking water for horses and the designer should consider reuse of rainwater and incorporate where viable.
- 1.2. The FRA is not clear on the runoff destination for surface water runoff. Further information should be provided on the proposed runoff destination to demonstrate the design is feasible, subject to technical design.
- 1.3. Infiltration features are noted in the FRA but no evidence has been provided to demonstrate the feasibility of infiltration features. It is unlikely that an infiltration solution will be viable in close proximity to the river. Guidance on ground investigation for infiltration features is provided on Arun DC webpages, here: <https://www.arun.gov.uk/surfacewater>.
- 1.4. The runoff destination is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. No information is provided on measures to intercept the initial runoff from the first 5mm of rainfall.
- 2.2. Interception drainage should be clarified as part of the drainage strategy.
- 2.3. 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. No information is provided on management of extreme rainfall. The current proposals would increase runoff from the site and do not provide attenuation of extreme rainfall.
- 3.2. 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. No assessment for water quality is provided with the application and water quality mitigation is not currently incorporated into the design.
- 4.2. The FRA notes permeable paving would be utilised for the carpark, which may provide suitable mitigation for the pollution hazard. Further information and assessment should be provided.

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. Further information is required to set out how the development provides amenity value through the sustainable drainage system.

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. Further information is required to set out how the development provides biodiversity enhancement through the sustainable drainage system.

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

- 7.1. Further information on the design, use and maintenance of the development should be provided as part of a sustainable drainage strategy.
- 7.2. The site is in single ownership and a maintenance plan can be provided as part of a technical design to discharge 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

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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<https://www1.arun.gov.uk/planning-application-finder>



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 22 September 2026 12:16
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: FG/51/26/PL

Please find enclosed our consultants response, an objection.

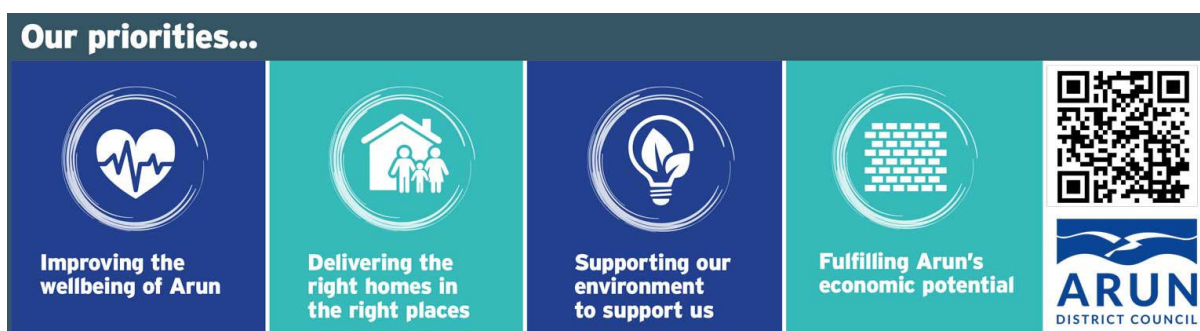
Regards

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

Sent: 02 September 2026 11:04

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

Subject: Planning Consultation on: FG/51/26/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: FG/51/26/PL

Registered: 27th August 2026

Site Address: Ferring Country Centre And Riding Stables Rife Way Ferring BN12 5JZ

Grid Reference: 508876 102826

Description of Works: Extension to the car parking area and a new building containing retail floor space. This application affect a Public Right of Way and is in CIL Zone 5 (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 1st October 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

Hebe Smith

Planning Officer- Arun District Council

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