

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FG/54/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Harry Chalk	Date of Review:	06/07/2026
Site Name:	Kivesborough Littlehampton Road Ferring BN12 6PN		
Application Description:	Subdivision of existing curtilage and erection of 2 No 3-bedroom self build/custom build dwellings, retention of existing access and provision of landscaping (resubmission following FG/15/25/PL). This application affects a Public Right of Way and is in CIL Zone 4 and is CIL Liable as new dwellings.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further information
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

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

- LOCATION PLAN PL01 REVP2
- GROUND CONTAMINATION RISK ASSESSMENT REPORT
- FRA AND DRAINAGE STRATEGY

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. The risk to the development from external sources of flood risk is acceptable.
- 0.2. The proposals will affect drainage on and around the site, therefore the development will require sustainable drainage in accordance with NPPF Paragraph 182.
- 0.3. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.4. The works to the existing property to be sub-divided does not affect drainage and does not require sustainable drainage to be incorporated into the existing drainage system. The drainage system proposed two new dwellings have been designed to incorporate sustainable drainage.

1. Runoff destination

- 1.1. Provision for collection and reuse of rainwater are not currently shown on the drainage strategy plan. Water butts would be suitable for small scale residential garden irrigation..
- 1.2. The proposed method of disposal of surface water runoff via infiltration to ground using infiltration blanket beneath the permeable paved areas. The ground investigation indicates that winter groundwater levels are registered as shallow as 0.3m below ground level. Therefore despite the viable infiltration rates found at 0.6m below ground level, an infiltration solution would not be in accordance with the NSfS. An alternate outlet should be investigated.
- 1.3. 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 currently provided by the proposed strategy to discharge rainwater to ground. However, the runoff destination need to be reviewed and interception drainage for the roof areas may require some landscaping features.
- 2.2. Interception drainage is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. The permeable paving has a depth of approximately 600mm and is within 1m vertical distance from the highest record winter ground water.
- 3.2. Microdrainage has been used to assess the design storm simulation and does not support the latest rainfall profiles (FEH22).
- 3.3. A drainage areas plans should be provided to summarise impermeable area and urban creep and to enable audit of the drainage model.
- 3.4. Calculations will need to be revised to suit an updated drainage strategy taking account of the measured high ground water.
- 3.5. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. The water pollution indices risk is low and water quality mitigation is provided by permeable pavement, green roof, silt traps and diffuser units, which meet the standards set out in the Simple Index Approach.

4.2. The mitigation would be acceptable whether the discharge is received by the subsoil or to a piped outlet. Water quality is acceptable.

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. However, 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. However, 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 management and maintenance plan is submitted with the Flood Risk and Drainage Statement and is suitable for the two new houses. The existing property has no external changes or new drainage.

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
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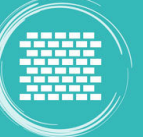
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 07 July 2026 17:20
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Subject: RE: Planning Consultation on: FG/54/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 25 June 2026 10:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: FG/54/26/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/54/26/PL
Registered:	19th June 2026
Site Address:	Kivesborough Littlehampton Road Ferring BN12 6PN
Grid Reference:	508927 103232
Description of Works:	Subdivision of existing curtilage and erection of 2 No 3-bedroom self build/custom build dwellings, retention of existing access and provision of landscaping (resubmission following FG/15/25/PL). This application affects a Public Right of Way and is in CIL Zone 4 and is CIL Liable as new dwellings.

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 30th July 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

Harry Chalk

Planning Officer- Arun District Council

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Email: harry.chalk@arun.gov.uk