

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                                                                                                                                             |                            |             |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| <b>Application Reference:</b>   | <b>FG/54/26/PL</b>                                                                                                                                                                                                                                                                                          | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Kathryn Welch                                                                                                                                                                                                                                                                                               | <b>Date of Review:</b>     | 07/08/2026  |
| <b>Site Name:</b>               | Kivesborough Littlehampton Road Ferring BN12 6PN                                                                                                                                                                                                                                                            |                            |             |
| <b>Application Description:</b> | 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. |                            |             |
| <b>Assessment Number:</b>       | 2                                                                                                                                                                                                                                                                                                           |                            |             |

| Policy and Guidance Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
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| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |  |

| Response | Objection |
|----------|-----------|
|----------|-----------|

| References                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p> |

## 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 | <b>Objection</b>           |
| 2. Interception drainage                                                          | Insufficient | <b>Objection</b>           |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient | <b>Further information</b> |
| 4. Water Quality                                                                  | Compliant    | <b>No objection</b>        |
| 5. Amenity                                                                        | Insufficient | <b>No objection</b>        |
| 6. Biodiversity                                                                   | Insufficient | <b>No objection</b>        |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Compliant    | <b>No objection</b>        |

## 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
- **Response to LLFA July 2026**
- **EMAIL 23.7.26 drainage response**

## 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.
- 0.5. We have reviewed the Response to Comments note TN01 dated 17 July 2026.

### 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.
- 1.4. Note - There is no change to these comments following review of TN01.
- 1.5. The groundwater monitoring data from WS02B is rejected as it only commences in April and does not capture peak winter groundwater levels. The groundwater monitoring provided from WS01 and WS02 demonstrates shallow groundwater. This occurred on several occasions with peaks within 1m of the proposed infiltration features and is not a single error result. If the winter groundwater monitoring provided is rejected by the applicant, further evidence should be provided to demonstrate the design is compliant.

### 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 states 2013 data is used. Evidence should be provided that the latest rainfall profiles (FEH22) are used, or a comparison used to demonstrate robust assessment.
- 3.3. A drainage areas plans should be provided to highlight impermeable area and urban creep and to enable audit of the drainage model. The areas quoted in the report text are not shown on the drainage plan. It is not clear, for example, whether the front entrance paths are included. This would be clarified on a drained areas plan as required by Arun DC guidance.

- 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

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
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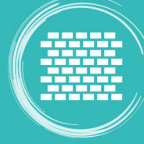
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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**From:** Paul Cann <Paul.Cann@arun.gov.uk>  
**Sent:** 11 August 2026 09:12  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Land Drainage <Land.Drainage@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

**T:** 01903 737819  
**E:** [paul.cann@arun.gov.uk](mailto:paul.cann@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)



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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



**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 29 July 2026 11:04  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: FG/54/26/PL

To: **Engineers (Drainage)**

**NOTIFICATION FROM ARUN DISTRICT COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990**

|                              |                                                                                                                                                                                                                                                                                                              |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Application No:</b>       | <b>FG/54/26/PL</b>                                                                                                                                                                                                                                                                                           |
| <b>Registered:</b>           | 19th June 2026                                                                                                                                                                                                                                                                                               |
| <b>Site Address:</b>         | Kivesborough Littlehampton Road Ferring BN12 6PN                                                                                                                                                                                                                                                             |
| <b>Grid Reference:</b>       | 508927 103232                                                                                                                                                                                                                                                                                                |
| <b>Category:</b>             | Plan Applicat'n                                                                                                                                                                                                                                                                                              |
| <b>Description of Works:</b> | 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. |

I am able to inform you that I have received an amendment to the above application dated 23rd July 2026 relating to:- Response to Drainage comments

If you should wish to make further representations as a result of this amendment, please make any further comment by **13th August 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

Harry Chalk

Planning Case Officer- Arun District Council

Telephone: 01903 737577

Email: [harry.chalk@arun.gov.uk](mailto:harry.chalk@arun.gov.uk)

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