Engineers Comments Regarding Surface Water Drainage

Application Reference:	**FG/76/26/PL**	**Reviewer Reference:**	ADC/EXT5/AF
Planning Officer:	Hebe Smith	**Date of Review:**	17/08/2026
Site Name:	Ferring Country Centre And Riding Stables Rife Way Ferring BN12 5JZ		
Application Description:	Change the use of a field (currently used as an occasional overflow carpark) to a dedicated overflow carpark. This application affects a Public Right of Way.		
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**

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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.

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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	Compliant	**Further information**
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:

-Proposed 500kVA Package Substation Site Location Plan
-Location Plan
-FRA
-Email from applicant submitting missing documents and confirming opening times and no change in car park surfacing 4.8.26

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

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Consultation comments to the planning officer

0. General
   0.1. The planning application is for change of use from pasture field to year round use as an overspill car park. There is also a proposed electricity substation.
   0.2. Whilst the application states there will be no change to the surfacing or levels and therefore no change to existing drainage, the use of the field as a car park is not compatible with greenfield land use and the proposed long-term access by vehicles, parking and turning, will increase runoff as the natural topsoil and planting is compacted and depleted over time or churned up and removed to leave bare subsoil. This may lead to muddy flooding.
   0.3. The development will therefore affect drainage and should incorporate sustainable drainage methods / a 'SuDS Approach' proportionate to the nature and scale of development in accordance with NPPF paragraph 182.
   0.4. The development site is adjacent to the Ferring Rife main river and parts of the field are within a flood risk zone. The Environment Agency will provide advice on flood risk from rivers and seas.
   0.5. There is an isolated area within the site at risk of flooding from surface water which is not a significant flood risk concern in terms of risk to the proposed use.

1. Runoff destination
   1.1. The site current drains overland to ditches at the field edges which discharge to the Ferring Rife.
   1.2. The proposals do not include surface water drainage and the current drainage strategy is to allow the field to drain by runoff without alteration. As noted above, this will lead to an increase in runoff from the field over time and sustainable drainage should be used to mitigate this risk.
   1.3. Further information should be provided on the proposed runoff destination.
   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. Whilst the current proposals retain topsoil which would provide interception drainage, the long-term use of the exiting surface as a carpark is not viable.
   2.3. Interception drainage should be clarified as part of the drainage strategy.

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. Water quality mitigation is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 4. Therefore, we **object** to the application.

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, and which is proportionate to the nature and scale of development.

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, and which is proportionate to the nature and scale of development.

7. Construction, operation, maintenance, decommissioning and structural integrity
   7.1. The proposed reuse of the greenfield surface is not suitable for long-term use as a carpark and some form of surface improvement which incorporates drainage would be necessary to prevent an increase in runoff and potential muddy flooding.
   7.2. Further information on the design, use and maintenance of the car park should be provided.

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

[redacted]

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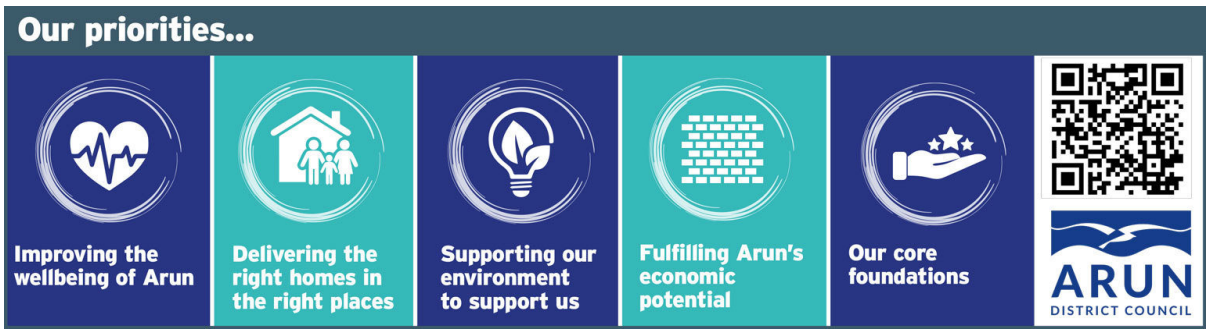

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 18 August 2026 13:28
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: FG/76/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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E: paul.cann@arun.gov.uk

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 07 August 2026 16:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: FG/76/26/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/76/26/PL**
Registered:	6th August 2026
Site Address:	Ferring Country Centre And Riding Stables Rife Way Ferring BN12 5JZ
Grid Reference:	508876 102826
Description of Works:	Change the use of a field (currently used as an occasional overflow carpark) to a dedicated overflow carpark. This application affects a Public Right of Way.

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 September 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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Email: hebe.smith@arun.gov.uk

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