

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                                                                                                                        |                            |             |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| <b>Application Reference:</b>   | <b>FG/87/26/PL</b>                                                                                                                                                                                                                                                                     | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Hebe Smith                                                                                                                                                                                                                                                                             | <b>Date of Review:</b>     | 14/09/2026  |
| <b>Site Name:</b>               | 42 Sea Lane Ferring BN12 5EH                                                                                                                                                                                                                                                           |                            |             |
| <b>Application Description:</b> | Demolition of the existing dwelling and garages and erection of 4 No. terraced dwellings at the site's frontage, and 2 No. detached dwellings at the rear. Access from Sea Lane. Replacement garage to serve No.36 Sea Lane Gardens. In CIL Zone 4 and is CIL Liable as new dwellings. |                            |             |
| <b>Assessment Number:</b>       | 1                                                                                                                                                                                                                                                                                      |                            |             |

| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <p>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.</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>Objection</b>                          |
| 4. Water Quality                                                                  | Insufficient | <b>Objection</b>                          |
| 5. Amenity                                                                        | Insufficient | <b>Further Information</b>                |
| 6. Biodiversity                                                                   | Insufficient | <b>Objection</b>                          |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Compliant    | <b>No objection subject to conditions</b> |

## Reviewed Plans

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

- FRA
- Outline Drainage Strategy
- Ground Investigation Report
- Surface Water Drainage Design Checklist

## 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 application is for non-major development which affects drainage on and around the site and therefore requires sustainable drainage in accordance with Section F8 of the NPPF.
- 0.2. The application is supported by a Flood Risk Assessment and an Outline Drainage Strategy report, together with a Ground Investigation and Infiltration Monitoring report.
- 0.3. The site is Flood Zone 1 for rivers and seas but is at high risk of flooding from surface water.
- 0.4. The catchment of the existing flood risk area may extend beyond the site boundary the flood water may be displaced by the scheme, or need to be incorporated in to the drainage system in order to mitigate flood risk to the proposed dwellings. We are therefore unable to advise from the information currently provided whether the development proposals release the applicant from Sequential Testing requirements under Section F5 of the NPPF.

### 1. Runoff destination

- 1.1. Water butts are noted in the Outline Drainage Strategy report and can be specified and included on the drainage layouts at technical design stage.
- 1.2. The drainage strategy is to discharge to ground via infiltration and ground investigation is provided which includes groundwater monitoring and infiltration testing.
- 1.3. The ground investigation does not meet the requirements set out in Arun DC guidance. Guidance is provided on Arun DC webpages, here: [www.arun.gov.uk/designer-checklists](http://www.arun.gov.uk/designer-checklists).
- 1.4. The groundwater monitoring does not provide six months data for the location relied upon. BH02 only provides one month's readings, from 27 February to 27 March. The peak groundwater level is indicated by the BH01 to be earlier by the 30 January reading which is within 500mm of the ground level. The dataset therefore does not demonstrate an infiltration design is feasible in terms of maintaining 1m vertical distance above winter high groundwater level.
- 1.5. The infiltration testing does not meet the required standard in that only a single fill of the trial pits was undertaken. Both BRE365 and CIRIS156 methods require three fills in order to replicate saturated conditions. The rates returned are close to the boundary of viability of reliance upon infiltration as a means of disposal of surface water and may fall below this threshold ( $1 \times 10^{-6}$  m/s) were a second and third test undertaken. The dataset therefore does not demonstrate feasibility of the infiltration solution.
- 1.6. The runoff destination is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

### 2. Interception drainage

- 2.1. Interception drainage is currently based upon the infiltration solution, which has not been demonstrated to be viable.
- 2.2. Changes to the design and approach to interception drainage will be required if the infiltration solution is not feasible.
- 2.3. Please note, consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development.
- 2.4. Where infiltration is not viable, there is a risk that interception drainage may only be delivered by evapotranspiration. No SuDS features which allow evapotranspiration are proposed. It is unclear where interception features may be included within the proposed scale and layout.
- 2.5. Interception drainage is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. The infiltration solution has not been demonstrated to be feasible and the drainage strategy and calculations may therefore need to alter.
- 3.2. The calculations appear to be based upon a restricted outlet whereas the drainage layout does not show any outlet. There is also concern about the use of outline storage volume design tools for full planning stage calculations and a time incremental drainage analysis should be provided based upon proposed surface levels and drainage base / ILs.
- 3.3. 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. Water quality mitigation is not currently provided by the design as the permeable paving type utilised does not accord with the type of permeable paving construction which allows for the simple index approach within the SuDS Manual to be applied to the appraisal of mitigation of pollution hazard.
- 4.2. The design may also need to change due to comments on Standard 1 above.
- 4.3. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 4). Therefore, we **object** to the application.

5. Amenity

- 5.1. The design may change due to comments on Standard 1 above.
- 5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 5.3. The site includes permeable paving, which provides a limited provision of amenity. An assessment of the opportunities and provision of amenity value through the drainage system should be provided.

6. Biodiversity

- 6.1. The design may change due to comments on Standard 1 above.
- 6.2. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
- 6.3. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.
- 6.4. There is no site-specific biodiversity risk and opportunity (BRO) assessment provided. The submitted ecology report does not include sustainable drainage. Arun DC guidance is provided here, <https://www.arun.gov.uk/standard-6-biodiversity>
- 6.5. Biodiversity is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

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

- 7.1. There are no concerns regarding the construction, operation, decommissioning and structural integrity.
- 7.2. An outline maintenance plan is included in the Outline Drainage Strategy report. A detailed management and maintenance plan which is a standalone document can be provided at discharge of condition stage.

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 12:12  
**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/87/26/PL

Please find enclosed our consultants response, an objection.

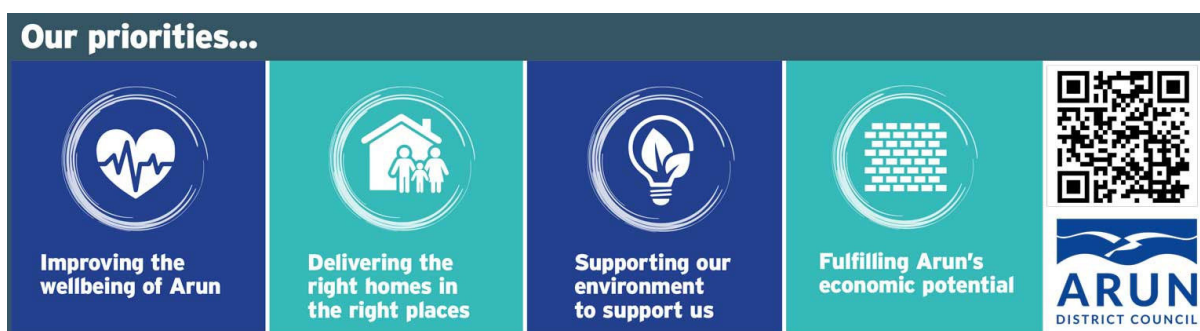
Regards

**Paul Cann**  
**Principal Drainage Engineer**, Coastal Engineers and Flood Prevention

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 28 August 2026 11:19

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Consultation on: FG/87/26/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/87/26/PL

**Registered:** 24th August 2026

**Site Address:** 42 Sea Lane Ferring BN12 5EH

**Grid Reference:** 509730 102344

**Description of Works:** Demolition of the existing dwelling and garages and erection of 4 No. terraced dwellings at the site's frontage, and 2 No. detached dwellings at the rear. Access from Sea Lane. Replacement garage to serve No.36 Sea Lane Gardens. 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 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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Email: [hebe.smith@arun.gov.uk](mailto:hebe.smith@arun.gov.uk)