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West Sussex  
PO19 1RH



## Lead Local Flood Authority

Jessica Riches  
Planning and Building Control  
Arun District Council  
Arun Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex  
BN17 5LF

Date 30 October 2024

Dear Jessica,

### RE: F/14/24/RES – Land at Ford Airfield, Ford, West Sussex

Thank you for your consultation on the above site, received on 16 September 2024. We have reviewed the application as submitted and wish to make the following comments.

This is an application for the approval of Reserved Matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for the infrastructure RM including the provision of a primary spine road and associated secondary road junctions, pavement, footpaths, cycle infrastructure and bus stops; site wide drainage infrastructure including foul pumping stations, foul sewer infrastructure, SUDS basins, SUDS swales, surface water infrastructure; acoustic fencing; public open space including landscape details, play areas, footpaths & associated works. This application affects a Public Right of Way, may affect the setting of a Listed Building and falls within CIL Zone 1 (Ford strategic site - zero rated).

We **object** to this planning application in the absence of an acceptable Drainage Strategy relating to:

- The application is not in accordance with NPPF, PPG Flood risk and coastal change or policy in Arun Local Plan.

### Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues highlighted below are adequately addressed:

1. Infiltration testing (in accordance with BRE 365) is required in those locations where groundwater has been found to be sufficiently deep, such that a 1m buffer below the base of infiltration structures is achievable. Where infiltration is found to be viable, it should be used in accordance with the drainage hierarchy. This should then be reflected in updated drainage calculations. Further refined and site-specific groundwater monitoring is required to inform the design in these areas.
2. The high groundwater levels will also need to be considered in detailed design of attenuation structures. 1m buffer (finished level and water level)
3. Qbar rate is 2.42 l/s/ha. Currently discharging over greenfield runoff rate, flood risk could increase elsewhere. Rates must only account for impermeable areas which will drain off-site.
4. Northern pond section is shown to be discharging c20l/s above Qbar at 70l/s? This infers potential flood risk. This must be reduced to actual Qbar.
5. Details of any additional attenuation features required within parcels should seek to act as source control where feasible.
6. Calculations showing 50% AEP rainfall event have shown no surcharge in the drainage network, also the 3.33% AEP rainfall event plus climate change does not flood outside the drainage network. These will require updating as necessary. Any areas which are shown to hold water should be clearly shown on plans.
7. Easements 3m from the top of the bank on both sides of any watercourses and the basins are required for maintenance access. Off road parking for maintenance vehicles is also required. Updated plans should reflect these requirements and be sufficiently and clearly annotated.
8. There is potential for the development to be phased, therefore we suggest consideration is given to the requirement of a SuDS implementation plan to reflect how areas may drain independently in advance of further phases coming forward.

#### **Informative:**

Structures within or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex County Council. It is advised to discuss proposals for any work, permanent or temporary at an early stage of proposals.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

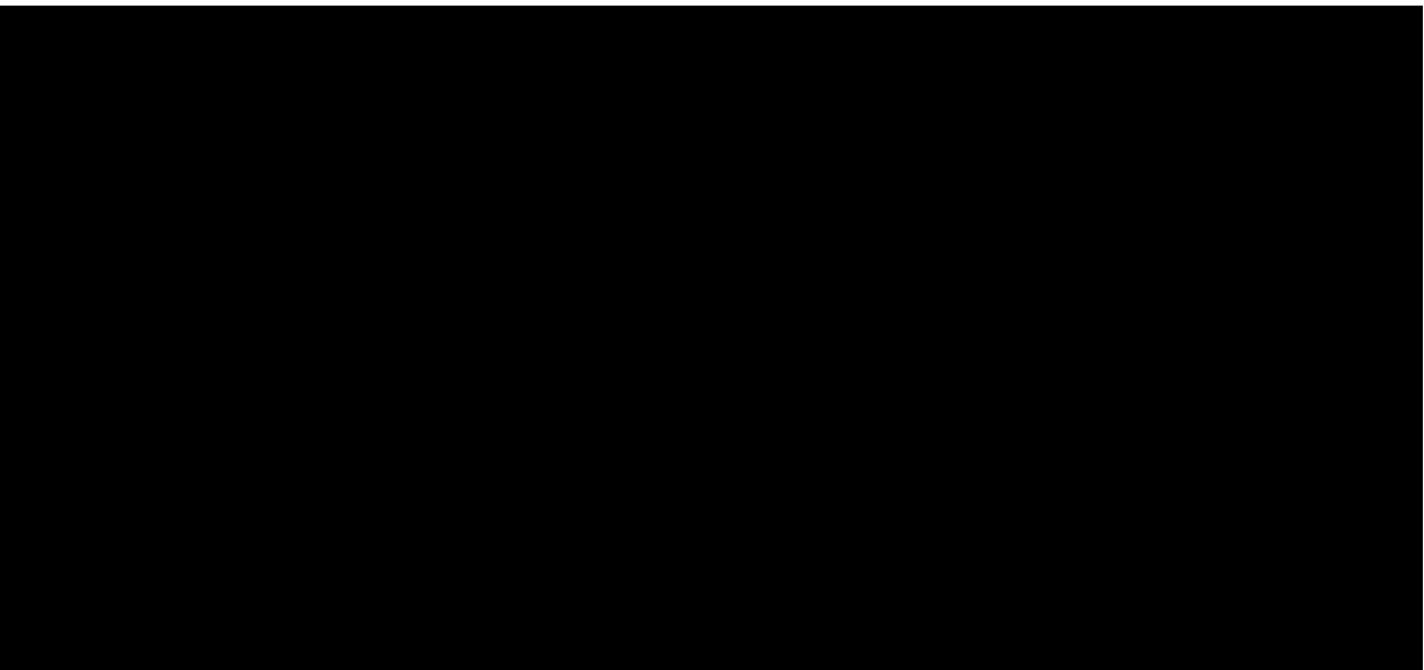
Mat Jackson  
**Flood Risk Management Team**

[Redacted]

## **Annex**

The following documents have been reviewed, which have been submitted to support the application;

- Drainage Technical Note 2205771 – R16-B by Ardent, August 2024
- IRM Site Sections 2205771-D170, 171, 172 by Ardent, August 2024



Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
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LLFA Response To Planning Application Number F/14/24/RES Land at Ford Airfield

Email:

Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to

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