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Lead Local Flood Authority

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

Date 09 December 2024

Dear Jessica,

RE: F/15/24/RES – Land at Ford Airfield, Ford, West Sussex

Thank you for your re-consultation on the above site, received on 26 November 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 permission F/4/20/OUT for phase Reserved Matters 1 (North), for the erection of 340 No. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas and 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 previously objected to this application in our response dated 30 October 2024, because there were elements of the Drainage Strategy which we were concerned with such as the proposed discharge rate and drainage calculations. As such, we considered that there was not sufficient space in the proposed layout for appropriate and sufficient drainage infrastructure.

The outline planning permission (F/4/20/OUT) includes a condition (condition 29) related to the submission of full details of the proposed surface water drainage scheme for each phase of the development. However, according to the LPA planning portal, condition 29 has not yet been discharged. This response therefore assumes that the condition is still to be discharged.

We have reviewed the Drainage Response (by Ardent, 13 November 2024, Ref. CC/2205771) and are pleased to see that several issues have been addressed. However we still have some concerns regarding the drainage calculations and layout.

We maintain our objection 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.*

The applicant has provided evidence that infiltration is not feasible, therefore no further infiltration testing or groundwater monitoring is required. **No further information required.**

2. *The high groundwater levels will also need to be considered in detailed design of attenuation structures. 1m buffer (finished level and water level)*

The applicant has confirmed that the attenuation structures will be lined where required to take into account high groundwater levels. This information should be provided as part of the discharge of Condition 29 of the outline planning permission F/4/20/OUT, for full details of the proposed surface water drainage scheme. **No further information required.**

3. *Qbar rate is 2.42 l/s/ha. If discharging at over greenfield runoff rate, flood risk could increase elsewhere, therefore rates must only account for impermeable areas which will drain off-site.*

The applicant has confirmed that the discharge rate for the northern part of the site will be reduced due to the existing outfall pipe size to below greenfield rates. We recommend that the updated proposed discharge rates are provided for each of the catchments as well as new drawings showing the extents of the basins. **We request that further information is provided.**

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.*

As above - the applicant has confirmed that the discharge rate for the northern part of the site will be reduced due to the existing outfall pipe size to below greenfield rates. We recommend that the updated proposed discharge rates are provided for each of the catchments as well as new drawings showing the extents of the basins. **We request that further information is provided.**

5. *Details of any additional attenuation features required within parcels should seek to act as source control where feasible.*

The Drainage Strategy is in accordance with the Outline Drainage Strategy. **No further information required.**

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.*

The calculations provided show surcharging in the 50% AEP rainfall event and use a CV value of 0.75 in summer and 0.84 in winter. We recommend that updated calculations are provided for the 50% AEP rainfall event with no surcharge and the 3.33% AEP rainfall event plus climate change, using a CV value of 1 for both the northern and southern areas. **We request that further information is provided.**

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.*

The applicant has confirmed that this has been considered and will be made clear on updated plans. We recommend that the updated plans are provided at this stage. **We request that further information is provided.**

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.*

The applicant has confirmed how this will be considered. **No further information required.**

Informative:

We suggest that condition 29 is discharged prior to re-submission of reserved matters in order that an approved drainage strategy can be considered in relation to the proposed layout.

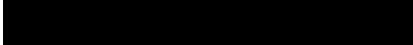
Structures within or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex County Council. It is advised

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,

Flood Risk Management Team



Annex

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

- Drainage Response, by Ardent, November 2024, Ref. CC/2205771.
- Drainage Technical Note 2205771 – R16-B by Ardent, August 2024.
- IRM Site Sections 2205771-D170, 171, 172 by Ardent, August 2024.