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**Lead Local Flood Authority**

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

Date 18 July 2025

Dear Emma Sheppard

**RE: F/19/25/OUT - Land to the South of Ford Lane Arundel**

Thank you for your consultation on the above site, received on 30 June 2025. We have reviewed the application as submitted and wish to make the following comments.

This application is for the outline planning application with all matters reserved (except access proposed along Ford Lane) for development of up to 400 No dwellings, a 8-10 form entry secondary school with associated sports pitches and facilities, a community hub building of up to 600 sqm, new pedestrian and cycle routes, Public Open Space, sustainable urban drainage system, landscaping and associated infrastructure. This application lies within the parish of Ford and Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan. This is a CIL liable development.

The applicant is required to:

- Assess the latest surface water flood risk information
- Further details on open SuDS features
- Updated calculations

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:

- The objections outlined in accompanied document
- The development not complying with NPPF, PPG or local policies due to these objections.

**Reason**

To prevent flooding in accordance with National Planning Policy Framework paragraph 181, 182 and 187 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 on the accompanying Planning Application Technical Response document are adequately addressed.**

Erection of flow control structures or any culverting of an ordinary watercourse requires consent from the appropriate authority, which in this instance is West Sussex Lead Local Flood Authority. It is advised to discuss proposals for any works at an early stage of proposals.

In December 2022 it was announced FEH rainfall data has been updated to account for additional long term rainfall statistics and new data. As a consequence, the rainfall statistics used for surface water modelling and drainage design has changed. In some areas there is a reduction in comparison to FEH2013 and some places an increase (see [FEH22 - User Guide \(hydrosolutions.co.uk\)](https://www.hydrosolutions.co.uk/FEH22-User-Guide)). Any new planning applications that have not already commissioned an FRA or drainage strategy to be completed, should use the most up to date FEH22 data. Other planning applications using FEH2013 rainfall, will be accepted in the transition period up to the 1<sup>st</sup> April 2023. This includes those applications that are currently at an advanced stage or have already been submitted to the Local Planning Authority. For the avoidance of doubt the use of FSR and FEH1999 data has been superseded by FEH 2013 and 2022 and therefore, use in rainfall simulations are not accepted.

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;

- Flood Risk Assessment, Niras, 12 January 2023.

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF  
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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 [REDACTED] but the responding officer can be contacted directly via email if there are any questions relating to this response.

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