

## Planning Application Technical Response

Site:	Land to the South of Ford Lane
LPA Reference:	F/19/25/OUT
Date Assessed:	18 July 2025



OUTLINE / Reserved Matters APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	<b>NPPF Paragraph 170, 181</b> <b>PPG Paragraph 051</b> <b>SDNSTS S10</b>  <i>Policy W DM2: Flood Risk &amp; Policy ECC SP1: Adapting to Climate Change</i>	Provide updated information within an amended FRA on;	
		<input type="checkbox"/> Fluvial flooding from the ordinary watercourse	Not near a water course
		<input checked="" type="checkbox"/> Surface water flow path originating offsite	<b>Objection:</b> The LLFA requires the applicant to submit an updated surface water flood risk assessment based on the latest available data.
		<input type="checkbox"/> Groundwater flooding	N/A
		<input type="checkbox"/> Rainwater surcharged sewer flooding	N/A
		<input type="checkbox"/> Historic flood information	Historical flood information has been submitted
Mitigation not appropriate	<b>NPPF Paragraph 170, 181 and 187</b> <b>PPG Paragraph 004, 023, 037, 041, 042, 043 and 044</b>  <i>Policy W DM2: Flood Risk</i>	<input checked="" type="checkbox"/> Use sequential approach with the following hierarchy. <ol style="list-style-type: none"> <li>I. how can the development first avoid the risk of flooding</li> <li>II. how will it be mitigated (with evidence)</li> <li>III. how will flood resistance and resilience be employed</li> </ol>	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood risk information has been carried out.
		<input checked="" type="checkbox"/> The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood risk information has been carried out.
		<input checked="" type="checkbox"/> Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood

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			risk information has been carried out.
Long term sustainability of the development	<b>NPPF Paragraph 181 and 187</b> <b>PPG Paragraph 004, 036, 061, 068 and 069</b>  <i>Policy W SP1: Water, Policy ECC SP1: Adapting to Climate Change &amp; Policy W DM3: Sustainable Urban Drainage Systems</i>	<input checked="" type="checkbox"/> Provide site specific ordinary watercourse or surface water flow path modelling.	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood risk information has been carried out.
		<input checked="" type="checkbox"/> Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood risk information has been carried out.
		<input checked="" type="checkbox"/> Include evidence of appropriate freeboard to finished floor levels from the design flood level.	<b>Objection:</b> The LLFA requires the applicant to address this once an assessment of the updated surface water flood risk information has been carried out.
		<input checked="" type="checkbox"/> Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	<b>Objection:</b> The LLFA notes the submission of hydraulic calculations showing the 200 year flood event. The applicant should provide calculations for the 3.33% AEP event (plus climate change) and the 1% AEP event (plus climate change).
		<input type="checkbox"/> Use up to date FEH2022 rainfall data for all design flood events.	FEH2013 used
		<input type="checkbox"/> Provision of an easement of 3 m from the top bank of any watercourse is required for maintenance.	N/A

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		<input type="checkbox"/> Identification is required of those structures which require consent for works on an ordinary watercourse (from the LLFA), this extends to works required within 8m from the top of the bank (see West Sussex LLFA website).	N/A
How does the site currently drain?	<b>NPPF Paragraph 182</b> <b>PPG Paragraph 059</b> <b>SDNSTS S1, S2, S3, S4, S5, S6</b>  <i>Policy W SP1: Water, Policy ECC SP1: Adapting to Climate Change &amp; Policy W DM3: Sustainable Urban Drainage Systems</i>	<input type="checkbox"/> Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Provided and shown as viable
		<input type="checkbox"/> Greenfield runoff rates and volumes missing.	Provided
		<input type="checkbox"/> Greenfield runoff rates need to be recalculated (incorrect input parameters).	N/A
		<input type="checkbox"/> Pre-development brownfield runoff rates missing.	Not a brownfield site
		<input type="checkbox"/> Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters).	Not a brownfield site
		<input type="checkbox"/> Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	Not a brownfield site
		<input type="checkbox"/> Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	Not a brownfield site
Where will the site drain to?	<b>NPPF Paragraph 182</b>	Drainage location hierarchy has not been followed, further information is required on;	<b>Objection:</b> The LLFA requires the applicant to submit information on rainwater

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<b>PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14</b>  <i>Policy W SP1: Water, Policy ECC SP1: Adapting to Climate Change &amp; Policy W DM3: Sustainable Urban Drainage Systems</i>		<input checked="" type="checkbox"/> evidence why rainwater reuse can't be included	reuse in the proposed development.
		<input checked="" type="checkbox"/> interception has not been calculated and /or provided	<b>Informative:</b> The LLFA requires the applicant to address interception.
		<input type="checkbox"/> Infiltration proposals – re Groundwater Source Protection Zone I restrictions	Not in a SPZ
		<input type="checkbox"/> Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	N/A
		<input type="checkbox"/> Surface water sewer – no in principle agreement from owner of the asset	N/A
		<input type="checkbox"/> Combined sewer – no in principle agreement from owner of the asset	N/A
		<input type="checkbox"/> In principle objection - proposing to connect surface water runoff to foul sewer	N/A
		<input type="checkbox"/> Detailed justification required why the application cannot be drained via gravity and a pump is required	N/A
		<input type="checkbox"/> Full impact assessment of failure and emergency procedures required if a pump is part of the design	N/A
		<input type="checkbox"/> Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	N/A

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Are the 4 pillars of SuDS provided and are they multifunctional?	<b>NPPF Paragraph 182</b> <b>PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063</b>  <i>Policy W DM3: Sustainable Urban Drainage Systems</i>	<input checked="" type="checkbox"/> Overarching proposals of how application must provide water quantity benefits in open, at the surface or above ground SuDS.  <input type="checkbox"/> Commitment to the use of SuDS and high-level assessment to include: <ul style="list-style-type: none"> <li><input type="checkbox"/> water quality</li> <li><input type="checkbox"/> biodiversity</li> <li><input type="checkbox"/> amenity</li> </ul>	<b>Objection:</b> The LLFA requires the applicant to submit information on how the site provides water quantity benefits in open, at the surface or above ground SuDS. The current proposals include open infiltration basins but we would expect to see more open features utilised within a development of this size.
How will the site drain without adversely effecting flood risk elsewhere?	<b>NPPF Paragraph 181, 182</b>  <b>SDNSTS S2, S3, S4, S5, S6</b>  <i>Policy W SP1: Water, Policy ECC SP1: Adapting to Climate Change &amp; Policy W DM3: Sustainable Urban Drainage Systems</i>	<input type="checkbox"/> The most precautionary infiltration rate should be used in the design of the attenuation feature.  <input type="checkbox"/> Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	<b>Informed:</b> The LLFA requires the applicant to submit a high level assessment on water quality, biodiversity and amenity for the site.
		<input type="checkbox"/> Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	<b>Informative:</b> The LLFA requires the applicant to address this once the above objections are addressed
		<input checked="" type="checkbox"/> Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	<b>Objection:</b> The 200 year design flood event has been submitted that shows a half drain time exceeding 24 hours.

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		<p><input checked="" type="checkbox"/> The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.</p>	<b>Objection:</b> The LLFA notes the submission of hydraulic calculations showing the 200 year flood event. The applicant should provide calculations for the 100% AEP event.
		<p><input type="checkbox"/> Proposed discharge rates and volumes are greater than greenfield with no justification</p>	<b>Informative:</b> The LLFA requires the applicant to provide justification if the proposed discharge rates and volumes are greater than greenfield.
		<p><input checked="" type="checkbox"/> Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.</p>	<b>Objection:</b> It is unclear whether an allowance for urban creep has been included in the calculations.
		<p><input type="checkbox"/> Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.</p>	Not brownfield
		<p><input type="checkbox"/> Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.</p>	N/A
		<p><input type="checkbox"/> A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.</p>	Not groundwater dominate.
		<p><input checked="" type="checkbox"/> How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?</p>	<b>Informative:</b> The applicant is required to address this if they only supply only pre and post calculations of greenfield runoff rates.
		<p><input type="checkbox"/> A complex control for runoff rate with long term storage provided, is required, if</p>	Not a complex control

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		<p>the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.</p> <p><input checked="" type="checkbox"/> Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.</p>	<p><b>Objection:</b> The LLFA notes the submission of hydraulic calculations showing the 200 year flood event. The applicant should provide calculations for the 3.33% AEP event (plus climate change) and the 1% AEP event (plus climate change).</p>
		<p><input checked="" type="checkbox"/> Calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.</p>	<p><b>Objection:</b> It is unclear whether an allowance for urban creep has been included in the calculations.</p>
		<p><input type="checkbox"/> Use up to date FEH2022 rainfall parameters in any modelling scenarios.</p>	<p><b>Informative:</b> FEH2013 has been used</p>
Location of SuDS		<p><input type="checkbox"/> Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout.</p>	<p><b>Informative:</b> The LLFA would expect further investigation into open SuDS features. The drawings should be updated if changes to the SuDS network are made.</p>
How will the drainage and watercourse features be managed and maintained?	<p><b>NPPF Paragraph 182</b>  <b>PPG Paragraph 055, 057 and 058</b>  <b>SDNSTS S10, S11, S12, S13 and S14</b></p>	<p><input checked="" type="checkbox"/> Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.</p> <p><input type="checkbox"/> Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.</p>	<p><b>Objection:</b> Further details of the maintenance and management of SuDS features is required.</p> <p><b>Informative:</b> The LLFA requires the applicant to address this if any changes to the drainage layout occur.</p>

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		<p><input checked="" type="checkbox"/> Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.</p>	<b>Objection:</b> The LLFA requires the applicant to submit information on the vehicular access routes for the proposed ponds.
		<p><input type="checkbox"/> Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse).</p>	N/A
		<p><input checked="" type="checkbox"/> Due to the likely long duration build out time (including phased development proposals), a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices</p>	<b>Objection:</b> The LLFA requires the applicant to submit a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features.
		<p><input checked="" type="checkbox"/> A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as the need to discharge to a sewer or watercourse with appropriate pollution measures.</p>	<b>Objection:</b> The LLFA requires the applicant to submit information on how water quantity and water quality will be managed during the construction phase.
Other		<p><input type="checkbox"/> Bespoke advice</p>	

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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF  
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**From:** [REDACTED]  
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**Subject:** Email 2 of 2: Response to application F/19/25/OUT

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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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