

Engineers Comments Regarding Surface Water Drainage

Application Reference:	F/21/24/PL	Reviewer Reference:	ADC/SB
Planning Officer:	Amber Willard	Date of Review:	26/09/2025
Site Name:	Land rear of Waterbury House Ford Road Ford BN18 0BH		
Application Description:	Erection of 4 No supported living units (C3(b)), office block, car parking and associated works. This application is a Departure from the Development Plan, affects the setting of a listed building and is in CIL Zone 3 and is CIL Liable as new dwellings.		
Assessment Number:	1 of 1		

Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance (including design checklists) - <https://www.arun.gov.uk/surfacewater>

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/>

Arun District Council Land Drainage Byelaws - <https://www.arun.gov.uk/byelaws/>

Arun District Council surface water pre-commencement conditions - <https://www.arun.gov.uk/planning-pre-commencement-conditions>

The National Standards for SuDS - <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

The SuDS Manual [C753] by CIRIA

Response	Objection in principle
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References

The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). 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.

The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.

This consultation has been primarily informed by the NSfS and The SuDS Manual.

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	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- NPPF Flood Risk Assessment, reference 2024-026, dated 13/05/2024.
- Existing Site Plan 0072404 10
- Proposed Site Plan 0072404 11

Consultation comments to the planning officer

0. General

0.1. The application has insufficient supporting information to demonstrate that the surface water drainage of this proposed development will not increase flood risk. There is no formal design, only suggested design approaches, none of which are substantiated with suitable levels of investigation. There is a risk that there may be insufficient space on the site for adequate surface water storage, or that no viable disposal location can be identified.

1. Runoff destination

1.1. No design has been submitted. Water reuse is not suggested to be prioritised where it should be. It is indicated that infiltration will be prioritised, however now site-specific ground investigations have

been completed. If groundwater is too high, or infiltration rates too slow then infiltration may not be viable.

- 1.2. The nearest watercourse is approximately 170m east of the site and connecting to it would require crossing third party land. The designer has ruled out this option.
- 1.3. If infiltration is not viable then the designer indicates that runoff will be stored and discharged to a public sewer which they 'anticipate' will be located with Ford Road. The public sewer records do not show any sewers on Ford Road in this area.
- 1.4. There is highway drainage on Ford Road, however, the highway authority is under no obligation to accept additional flow to their network and such connections are heavily resisted.
- 1.5. Therefore, if infiltration is not viable there are no obvious alternative disposal locations, and it is unclear how the development will be drained.
- 1.6. Due to the uncertainty regarding the disposal location, we **object in principle** to the application.
- 1.7. As there is no proposed design to assess we have no assessment the remaining national standards for SuDS. Please assume an objection on every standard as the applicant has not demonstrated compliance with any of them, in the absence of a proposed design.

2. Interception drainage

- 2.1. There is no proposed design and the disposal method is uncertain. No assessment of interception drainage has been submitted, and it is unclear if this standard may affect the scale and layout of the proposed development. We therefore **object** to the application.

3. Extreme rainfall and flooding

- 3.1. There is no proposed design and the disposal method is uncertain. Parts of the site are in flood areas where SuDS features must not be located. The suggested infiltration rates and discharge rates (for design options) are not adequate substantiated and may increase flood risk if approved.
- 3.2. The submitted calculations do not conform to the national standards for SuDS or The SuDS Manual and there are no drainage plans to assess. We therefore **object** to the application.

4. Water quality

- 4.1. There is no proposed design and the disposal method is uncertain. As such no water quality assessment has been submitted and it is unclear if this standard may affect the scale and layout of the proposed development. We therefore **object** to the application.

5. Amenity

- 5.1. There is no proposed design and the disposal method is uncertain. It is unclear if this standard may affect the scale and layout of the proposed development. We therefore **object** to the application.

6. Biodiversity

- 6.1. There is no proposed design and the disposal method is uncertain. It is unclear if this standard may affect the scale and layout of the proposed development. We therefore **object** to the application.

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

7.1. It is noted that there are existing trees on this site. The impact of these trees on the proposed drainage of the site is unknown. It is unclear if this standard may affect the scale and layout of the proposed development. We therefore **object** to the application.

8. 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

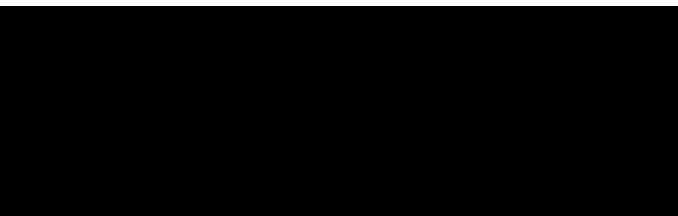
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

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

Drainage Engineers response



Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 26 September 2025 15:39
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Amber Willard <Amber.Willard@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: F/21/24/PL

Hi Amber,

Find the consultation - an objection in principle – attached. Apologies for the delay in response.

Kind regards

Sarah Burrow
Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737815

E: sarah.burrow@arun.gov.uk

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF

www.arun.gov.uk



Our priorities...



From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 08 July 2025 11:18

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: F/21/24/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: F/21/24/PL

Registered: 8th July 2025

Site Address: Land rear of Waterbury House Ford Road Ford BN18 0BH

Grid Reference: 500305 104282

Description of Works: Erection of 4 No supported living units (C3(b)), office block, car parking and associated works. This application is a Departure from the Development Plan, affects the setting of a listed building and is in CIL Zone 3 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 on site 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 7th August 2025 . 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

Amber Willard

Planning Officer- Arun District Council

Telephone: 01903 737942

Email: amber.willard@arun.gov.uk

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