

Engineers Comments Regarding Surface Water Drainage

Application Reference:	F/25/26/DOC	Reviewer Reference:	ADC/EXT4b
Planning Officer:	David Easton	Date of Review:	08/05/2026
Site Name:	Land at Ford Airfield Ford		
Application Description:	Approval of details reserved by condition under F/4/20/OUT relating to conditions 28- Foul Drainage, 29- Surface Water Drainage, 30- Discharge to Watercourses and 31- Maintenance & Management.		
Assessment Number:	1 of 2		

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	Condition 29: Objection Condition 30: No objection (Part Discharge) Condition 31: Objection
-----------------	---

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

Standard	Assessment	Response
1. Runoff destination	Compliant	No 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:

- Reserved Matters 1 Location Plan. Drg no. 2205771-D061 Rev A
- General Arrangement Layout. Drg no. 7303-SMA-XX-XX-DR-C-01-001
- Impermeable Areas Plan Sheet 1. Drg no. 7303-SMA-XX-XX-DR-C-21-001 Rev T02
- Impermeable Areas Plan Sheet 2. 7303-SMA-XX-XX-DR-C-21-002 Rev T02
- Drainage Layout Sheet 1-12 Drg no. 7303-SMA-XX-XX-DR-C-04-001 Rev T04, uploaded in 12 parts via public planning portal
- Vertical Profiles and Drainage Construction Details
- Exceedance Flow Route Plan Sheet 2. Drg no. 7303-SMA-XX-XX-DR-C-20-002 Rev T02
- Soakaway Testing 17.02.2026 Part 1
- Soakaway Testing 17.02.2026 Part 2
- Winter Groundwater Monitoring 07.05.2024 Part 1 and Part 2
- Drainage Statement (Conditions 28-31) March 2026
- Drainage Maintenance and Management Plan. March 2026

- Drainage Technical Note July 2021
- Surface Water Network 25.03.2026. Part 1-3
- Full SuDS Design Checklist

Plans/Documents to be listed as approved

Condition 30

No plans need to be listed as approved in relation to part discharge of condition 30 for RM1 as there are no discharges to watercourses from this network – they are from the IRM networks.

Condition wording

Condition 29 is worded as follows:

“Prior to the commencement of each phase of development (excluding demolition, site survey and site investigation works) as identified within the Phasing Strategy under Condition 5 full details of the proposed surface water drainage scheme for that phase, in accordance with the principles set out in the Drainage Technical Note (ref: C85228-JNP-92-XX-RP-C-1004) dated 9 July 2021 and the requirements of the Design Code secured under Condition 7, shall be submitted to and approved in writing by the Local Planning Authority.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan 2011-2031. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.”

Condition 30 is worded as follows:

“Development shall not proceed on any phase of development as identified within the Phasing Strategy under Condition 5, until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W DM1, W DM2 and W DM3 of the Arun Local Plan. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010,

can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing”

Condition 31 is worded as follows:

“Development shall not proceed on any phase of development as identified within the Phasing Strategy under Condition 5, until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies W DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. This application forms part of the wider strategic Ford Airfield site. The scale and layout of the receiving basins have been approved via the reserved matters planning application F/14/25/RES. The basins are designed to receive surface water runoff from this part of the site and other parcels who's scale and layout have not been approved yet.
3. The LPA are reminded that the reserved matters applications for both IRM and RM1 were objected to based on the proposed surface water drainage design at the time. **The fundamental design parameter that parcel SuDS are necessary in the north of the site has not been followed. As such it is expected that a significant redesign of the surface water drainage for RM1 is necessary.**
4. Each parcel DOC application relating to condition 29 will be assessed on it's own merit building on any previous approvals. This means that the applicant will have to ensure that there is sufficient storage capacity in the system for subsequent parcels. The total spare volume reducing with each application. In addition, it is expected that the discharge rate will change as the wider site is constructed to ensure that flood risk is not increased in the early stages of construction.
5. It is suggested that a short living document recording the use of surface water storage and the changing discharge rates is agreed and kept by both the LPA and the applicant to avoid confusion and abortive work in later applications.
6. No withstanding this advice, this application does not contain sufficient detail regarding the surface water drainage of the RM1 to demonstrate that flood risk will not be increased by the design or that adequate water treatment is provided. As such an objection is lodged. Please see the comment tracker appended to this consultation for further technical comment. This should be shared with the designer and they should be encouraged to respond to it.

7. For any further submissions it is requested that the labelling on the portal aligns with the appendix descriptions in the cover letter and drainage statement to aid review.

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) – when further details are submitted**
- ☐ 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

Application Reference: F/25/26/DOC Site Name: Land at Ford Airfield	Initial Issue Date: 08/05/2026 Issue Date: Reviewer Reference: ADC/EXT4b
--	--

Summary and Recommendation:

Condition 29: **Objection**
Condition 30: **No objection**
Condition 31: **Objection**

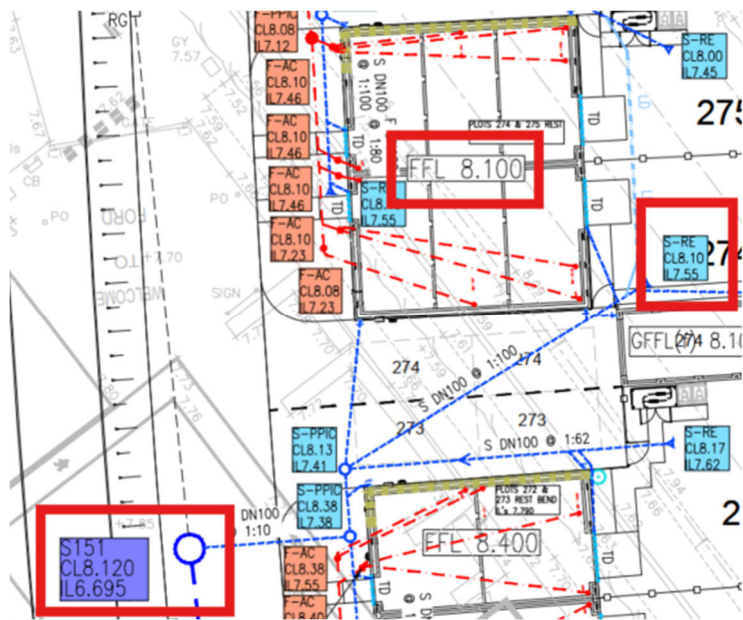
Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

	ADC Drainage Comments	Designer Response			
Date:					
Condition Number: 29 – Surface water design					
Comment Number					
1.	It is accepted that infiltration is not viable for runoff disposal of extreme events due to infiltration rates which would not meet half drain requirements in this part of the site.				
2.	There are multiple areas of high surface water flood risk in this part of the site. How is this accounted for in the design? It is not mentioned in the drainage statement or marked on the checklist. (It is expected that surface water flow will be entering the site from elsewhere based on the known topographic levels.)				
3.	Condition 28 should be discharged for IRM before it can be discharged for RM1 due to RM1 reliance upon drainage infrastructure.				
4.	The condition states that the design should be in accordance with the principles set out in the Drainage				

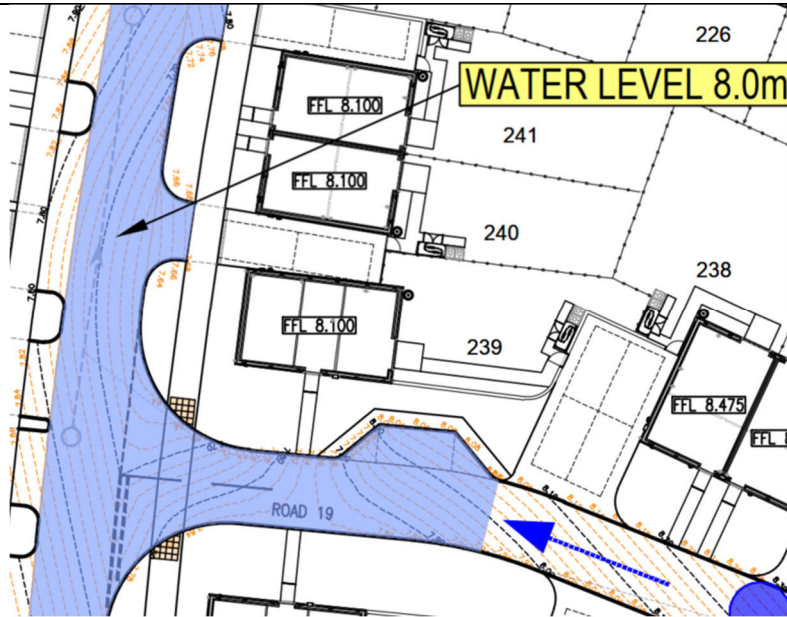
	Technical Note (ref: C85228-JNP-92-XX-RP-C-1004) dated 9 July 2021 and the requirements of the Design Code secured under Condition 7. The JNP technical note states that the north/northwest parcels will drain using “parcel SuDS with overflows/connections to a piped sewerage system which discharges to an infiltration basin.” It is acknowledged that infiltration for this purpose has since been proven unviable, and also that ultimate discharge shall be to the northeast basin(s), however no ‘parcel’ suds have been provided. Paragraph 2.6 indicates that permeable paving will be provided for water treatment, none is shown on the drainage layouts. Paragraph 5.4 acknowledges that the permeable paving may be tanked if infiltration is not viable. Please update the design accordingly.				
5.	The design for RM1 relies on features that are not part of this DOC application or RM parcel. No detailed information regarding the interaction between the parcels and their drainage has been submitted. As stated on our consultation for IRM, it is important that the applications for the parcels all tie together accurately. For example, now that detailed calculations have been completed for RM1 these should be compared with those for IRM to demonstrate compliance and that flood risk is not being increased. Furthermore, where a parcel relies upon the wider basins for water treatment or interception then it must be demonstrated that the assessments for these are accurate, that there is sufficient storage capacity and that there is no double counting.				

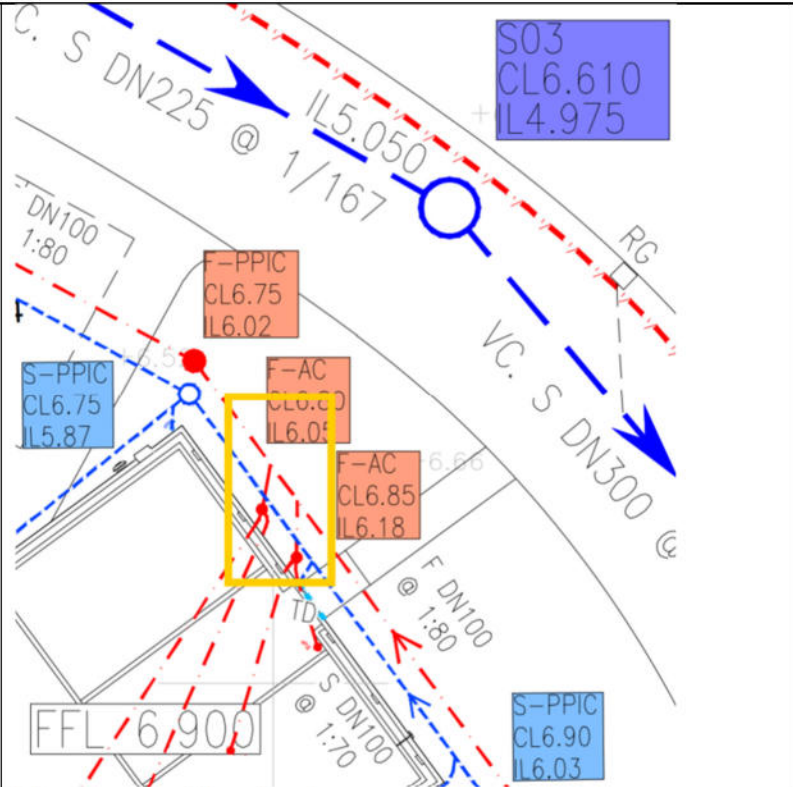
6.	As per comment 5 – assumed invert levels at outfalls to the IRM network are inappropriate. Please use the correct levels or remove the reference to an assumption.				
7.	It is noted that 210 litre waterbutts are proposed this means water reuse is being prioritised. However, for these to be counted towards meeting an interception standard they must be ‘smart’ – ie designed to drain (at least in part) between storms. Please clarify the design of the water butts and whether they are intended to provide interception or just water reuse. If the former, then please include a construction detail drawing showing how they operate and interception calculations to demonstrate that they provide enough capacity for the areas that they serve.				
8.	No interception assessment is submitted. Please demonstrate that the contributing area which is applied for achieves sufficient interception drainage. Please see our advice at https://www.arun.gov.uk/interception-drainage-guidance-note for more information regarding the level of detail that is required. It is noted that the designer/agent have referred to designing to the previous non-statutory standards. However, the condition refers to the advice of The SuDS Manual which included standards relating to interception at the time of outline planning permission being granted.				
9.	Infiltration can still be relied upon for interception drainage (where groundwater levels allow) in parts of the site.				
10.	The water treatment assessment is inadequate. It relies upon the assessment for IRM without including that assessment in the submission.				

	Despite not being included the designer is warned that the consultation for IRM identified that the water treatment assessment mis-classified the basins as bio-retention areas and does not use the worst-case treatment train in the north where there are parts of the system which only pass through one basin. This means that it needs to be adjusted and further water treatment is likely to be required in RM1. Please adjust and include additional water treatment as appropriate.				
11.	There is ground raising in excess of 500mm over a significant area of the site, with raising of over 1m in several places. Please submit evidence that this will have no negative hydrological impact.				
12.	The impermeable area plans show that no gardens, patios, footpaths, bike/bin stores have been included in the calculations, yet these are clearly drained by the system (rwp on bin/bike stores and threshold drains). Please adjust the impermeable area plans and calculations accordingly. Where pervious areas are accounted for they can be adjusted to account for their permeability in frequent events please see https://www.arun.gov.uk/contributing-areas				
13.	Please submit the calculations for the wider site – adjusted for the detailed design for RM1.				
14.	Please submit manhole schedules.				

15.	Is there any existing drainage infrastructure in this part of the site? If so please show it on the plans and indicate how it is protected or decommissioned.				
16.	It is strongly suggested that the design is revised to ensure that there is no flooding of the 1% AEP + CC event.				
17.	S151 cover level of 8.12, flooded volume of 1.89m³ – upstream rodding eye cover level of 8.1 in plot 274 rear garden (not included in model), FFL of that plot also 8.1. Stated to flood road on exceedance plan. Please check levels of private drainage and all FFL in the vicinity of proposed flooding of the 1% AEP + 40% event. 				
18.	The exceedance plans only appear to show flooded volume for the 1% AEP + CC for RM1b not RM1a.				

	It also appears to be trying to show two different events. Please separate the plan showing the flooded volumes for the 1%v AEP + CC from the exceedance plan. This should show the actual volumes (and levels) where they'll flow to (in a similar manner to the volumes shown for an exceedance event. However, where there is flooding expected please include the gullies in the model as this is more likely to be where the water pops out (at low points). The flooded volume shown on plan should reflect the contours of the road and footpaths rather than being an arbitrary block or circle.				
19.	On the revised exceedance plan please be clear about what event it represents. As per the 1% AEP +CC SW drainage flooding event plan please show any flood volume aligned to the contours and accounting for gullies. Example in snip below shows how the flood area is misrepresented and would in fact flow into plot 239 front garden and sit around house which is likely to have a FFL 150mm above ground level. This would be an unacceptable exceedance.				

					
20.	Linked to comment 4 – there are no suds that provide water treatment, source control, amenity or biodiversity benefit within the parcel.				
21.	Please show proposed and existing trees, their RPA at full growth and any necessary protection on the drainage layouts.				
22.	Please check for and correct the design to remove clashes between foul and surface water. Se example below:				

					
23.	Please submit levels plans.				
24.	Please submit confirmation that IWNL have reviewed the surface water drainage design and are satisfied that it meets their standards for adoption (where it is offered for adoption).				
25.	How is silt managed/captured? If catchpit manholes or inspection chambers are required please include construction details.				
Condition Number: 30 – Watercourses					

Comment Number					
1.	There are no discharges to watercourses from this RM parcel therefore no objection. The condition cannot be fully discharged as IRM does have outfalls to ordinary watercourses.				
Condition Number: 31 – Management and Maintenance					
Comment Number					
1.	Please include a written summary of the surface water drainage of the site (extending into the drainage of IRM) and how it functions. This should be written in plain english intended to be read by future occupiers and the persons responsible for maintenance.				
2.	It is understood that this will be a living document that will be updated and combined with the subsequent phases of the development. The designer should consider how this is presented. For example, with an overarching summary and then broken down for the separate phases or by responsibility (a section for the highways authority, for the landowner or adopting body, for private owners).				
3.	Include maintenance for channel drains.				
4.	Designer's risk assessments, should be appended to the maintenance and management plan – they will not be assessed as part of the planning process.				
5.	Please detail potential performance risks for components are described. This should include a description of the likely impacts of malfunction to aid fault finding.				

	For example – blocked channel drains. Consider all components.				
6.	Detail the implications of lack of maintenance or incorrect maintenance in the overarching summary.				
7.	The approved drainage layouts and construction detail drawings shall be appended to the document.				
8.	Please refer to IWNL adoption standards.				
9.	Please stipulate that there will be a pre-handover inspection (as necessary or applicable, per phase, per completion, or prior to handover to management company or adopting body?)				
10.	It is suggested that an inspection checklist is created and appended to ensure consistent inspection.				
11.	Please list who should be contacted if the surface water drainage system is not functioning correctly.				
12.	Are there any prohibited maintenance activities or practices? If so highlight them in the document.				
13.	Please include an action plan for dealing with accidental spillages of pollutants – also consider where or when this may be more likely.				
14.	Stipulate a periodic review of the maintenance of the site with the opportunity (prescribed formal procedure) to update the maintenance plan.				
15.	Provide advice as to what to do if alterations are to be made to the development or, works are				

	to be carried out which may affect the surface water drainage system.				
--	---	--	--	--	--

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

PL- Consultation- Engineers response



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

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

Our priorities...



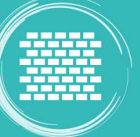
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations





Connect with us: [Facebook](#) | [X](#) | [Instagram](#)

From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 14 May 2026 11:23
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; David Easton <David.Easton@arun.gov.uk>
Subject: RE: Planning Consultation on: F/25/26/DOC

Please find enclosed our consultants response.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

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

Our priorities...



Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential





From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 07 April 2026 17:33
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: F/25/26/DOC

To: **Engineers (Drainage)**

1

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: F/25/26/DOC
Registered: 31st March 2026
Site Address: Land at Ford Airfield Ford
Description of Works: Approval of details reserved by condition under F/4/20/OUT relating to conditions 28- Foul Drainage, 29- Surface Water Drainage, 30- Discharge to Watercourses and 31- Maintenance & Management.

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **21st April 2026**.

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.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Mr D Easton

Planning Case Officer- Arun District Council

Telephone: 01903 737500 ex37361

Email: david.easton@arun.gov.uk