

Engineers Comments Regarding Surface Water Drainage

Application Reference:	F/3/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Kathryn Welch	Date of Review:	11/06/2026
Site Name:	Environment Agency Ford Depot Station Road Ford BN18 0BH		
Application Description:	Replacement of existing Portacabin with new single storey modular cabin for use as an ancillary building to the existing site, excavate grounds of mixed material to create trench for new power, water and drainage, install drainage pipework and associated items, including connection to existing, new or planned network, install electrical meters, transformers and associated items as required, excavations to be finished in concrete to match existing hardstand, new planters, wildlife houses and greenspace. This application is in CIL Zone 3 (Zero Rated) as other development.		
Assessment Number:	4		

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
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	Further Information Required
2. Interception drainage	N/A	
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	N/A	
6. Biodiversity	N/A	
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection

Reviewed Plans

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

- Proposed Civils Layout 230298-MML-00-00-DR-C-3000-S3-P4
- Engineers response
- Email to substitute drainage docs 12.5.26

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

N/A

Consultation comments to the planning officer

0. General

- 0.1. A Flood Risk Assessment is submitted with the application but does not contain a Drainage Statement. A drainage layout is shown on the Proposed Civils Layout drawing 3000 rev P4 and drainage calculations are provided.
- 0.2. The site is within Flood Zone 3a High Risk. The Environment Agency provides advice on flood risk from rivers and seas and we note their letter of No Objection subject to Condition dated 12 March.
- 0.3. There is an area of surface water flood risk indicated by national modelling adjacent to the area of works. The Portacabin is raised and should not be affected by this area of flood risk.
- 0.4. The site is currently paved and appears to runoff directly to the River Arun. The development incorporates drainage infrastructure and therefore affects drainage onsite which requires sustainable drainage to be incorporated in accordance with NPPF paragraph 182.
- 0.5. However, the works area is small and no increase in runoff would occur. Direct discharge to the tidal River Arun in this location would not require attenuation of extreme rainfall and peak runoff to mimic greenfield runoff rates, although it will need storage to prevent flooding during tide locking.
- 0.6. Multifunctional sustainable drainage measures for amenity and biodiversity should be proportionate to the nature and scale of development and in this instance can be omitted. We do not require specific sustainable drainage elements to be multifunctional and provide amenity and biodiversity value.

1. Runoff destination

- 1.1. No rainwater harvesting is required. The site will not be able to support infiltration and connection to the Main River is acceptable in principle.
- 1.2. The Civils Layout shown on drawing 3000 rev P4 indicates direct discharge to the River Arun by gravity with below ground storage (due to being tide locked at high tide).
- 1.3. We welcome the removal of mechanical pumping but need further evidence to confirm that the system can operate without flooding the site when tide locked. See comments below in 3.2.

2. Interception drainage

- 2.1. Not required – 'de minimus' development in terms of scale and nature.

3. Extreme rainfall and flooding

- 3.1. The discharge to the River Arun would not require attenuation of extreme rainfall for the purposes of peak flow control as the flows would not increase flood risk within the tidal river channel.
- 3.2. The calculations provided do not appear to incorporate a downstream surcharge due to tide locking. Further information should be provided to investigate whether the system can drain to the river without flooding including during the Mean High Water Spring downstream conditions with the temporary storage provided as a gravity system.
- 3.3. The calculations currently only include the 3.3% AEP storm with no climate change allowance. The calculations provided do not assess the design storm. Calculations should be provided to support the drainage strategy and demonstrate design storm conditions.
- 3.4. The current calculations are based upon FSR rainfall data and CV values of 0.75 summer and 0.84 winter. These parameters do not comply with the National SuDS Standards and Arun DC guidance.
- 3.5. Guidance on assessment of sustainable drainage designs is provided on Arun DC webpages, here: <https://www.arun.gov.uk/surfacewater/>
- 3.6. The current design does not demonstrate the site can be effectively drained to the receiving watercourse, therefore, we **Object** to the application.

4. Water quality

- 4.1. Water quality treatment should be provided for any drained runoff of external paved areas.
Clarification of water treatment for drainage of trafficked external areas should be provided.

5. Amenity

- 5.1. Not required – ‘de minimus’ development in terms of scale and nature.

6. Biodiversity

- 6.1. Not required – Paved existing site and ‘de minimus’ development in terms of scale and nature.

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

- 7.1. The works to achieve a drainage connection to the River Arun will require technical approval from the Environment Agency as Flood Risk Permitting works.
7.2. The site is in an existing yard owned and managed by a public body (Environment Agency) and maintenance of the drainage system is expected to be added to existing asset management.

8. Suggested conditions / 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



From: Daun Johnson on behalf of Planning.Responses
Sent: 17 June 2026 11:33
To: Planning Scanning
Subject: FW: Planning Consultation on: F/3/26/PL
Attachments: F-3-26-PL - Environment Agency Ford Depot 4.docx

Please upload attachment to F/3/26/PL, planning, consultee response, END objection

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



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 June 2026 11:27
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Subject: RE: Planning Consultation on: F/3/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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: 14 May 2026 15:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: F/3/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: F/3/26/PL
Registered: 29th January 2026
Site Address: Environment Agency Ford Depot Station Road Ford BN18 0BH

Grid Reference:	500253 104272
Category:	Plan Applicat'n
Description of Works:	Replacement of existing Portacabin with new single storey modular cabin for use as an ancillary building to the existing site, excavate grounds of mixed material to create trench for new power, water and drainage, install drainage pipework and associated items, including connection to existing, new or planned network, install electrical meters, transformers and associated items as required, excavations to be finished in concrete to match existing hardstand, new planters, wildlife houses and greenspace. This application is in CIL Zone 3 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 12th May 2026 relating to:- Substitute drainage plans and calculations

If you should wish to make further representations as a result of this amendment, please make any further comment by **5th June 2026**.

[Click here to view the application, documents and make further comments](#)

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.

Yours sincerely

Kathryn Welch

Planning Case Officer- Arun District Council

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Email: kathryn.welch@arun.gov.uk

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