

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/16/25/RES	Reviewer Reference:	ADC/SB
Planning Officer:	Emma Sheppard	Date of Review:	05/06/2025
Site Name:	Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN		
Application Description:	Approval of reserved matters following outline consent BE/150/22/OUT comprising of 3 No. units within Class B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, parking, landscaping and sustainable drainage system with access off Newlands Road. This application is in CIL Zone 4 (Zero Rated) as other development.		
Assessment Number:	1 of 1		

Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance - <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/> and
<https://www.arun.gov.uk/land-drainage-consent/>

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

The SuDs Manual [C753] by CIRIA

Sustainable drainage systems: non-statutory technical standards'
<https://assets.publishing.service.gov.uk/media/5a815646ed915d74e6231b43/sustainable-drainage-technical-standards.pdf>

Response	Objection
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Critical Items for Surface Water Drainage Design Conditions

The failure to adequately address the following items will result in an objection to a surface water drainage design.

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.

Items are further elaborated upon in the attached comment tracker where necessary.

Further comments which are unlikely to impact the design methodology will be provided in the comment tracker, these relate to the detailed design. Unless clearly stated, it is considered that these additional comments are unlikely to result in a redesign of the system. These can be addressed following a second consultation to prevent unnecessary refusals.

Critical Item	Reason	Status
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Winter groundwater monitoring data.	<p>Adequate winter groundwater monitoring data must be supplied to evidence that infiltration designs have sufficient freeboard from the base of structures and the peak groundwater level.</p> <p>The same data is necessary to ensure that the potential for buoyancy has been adequately considered in attenuation designs.</p>	Not supplied
Winter infiltration testing data.	<p>Adequate winter infiltration testing must be supplied to justify the proposed discharge method and design infiltration rates.</p> <p>Infiltration tests must be completed strictly in accordance with BRE DG 365, CIRIA R156 or a similar approved method. Testing depths must account for peak groundwater levels and correspond with the location and depth of proposed infiltration features.</p> <p>Designs must be based upon the <u>slowest</u> infiltration rate evidenced closest to a proposed infiltration feature. Average design rates will not be accepted.</p> <p>The results of incomplete tests should not be extrapolated to obtain design values for infiltration rates.</p>	Not supplied
The hierarchy for sustainable drainage.	<p>The proposed discharge method must accord with the SuDS hierarchy as given below. Evidence must be supplied to justify the proposed discharge method.</p> <ol style="list-style-type: none"> 1. Rainwater reuse where possible. 2. Complete discharge into the ground (infiltration). 3. Hybrid infiltration and restricted discharge to an appropriate water body or surface water sewer. 4. Restricted discharge to an appropriate water body. 5. Restricted discharge to a surface water sewer. 6. Restricted discharge to a combined sewer. <p>A water body may be defined as a river, watercourse, ditch, culverted watercourse, reservoir, wetland or the sea.</p>	Not supplied

	Engineers cannot support any proposed connection of surface water to the foul sewer.	
Calculations	<p>Calculations for pre-development run off rates must be based upon the positively drained area only.</p> <p>Proposed discharge rates must not increase flood risk on site or elsewhere. Discharge rates must be restricted to QBAR or 2 l/s/ha, depending on whichever is higher.</p>	Not supplied
	<p>Designs must be based on the most recently available rainfall data at the time of conditions being applied. <u>FSR rainfall data will not be accepted.</u> FEH rainfall data is based upon more recent records and continues to be updated.</p>	Not supplied
	<p>Designs must use the correct climate change allowances at the time of determination of the outline or full planning application.</p> <p>CV values for all events must be set to 1. This includes summer, winter, design, and simulation events.</p> <p>The correct allowance for urban creep must be applied.</p> <p>Additional storage must be set to zero unless it can be evidenced where this is provided.</p> <p>Infiltration half-drain times must be less than 24 hours.</p> <p>Infiltration design rates must be applied to the sides of soakaways, or to the base of infiltration blankets. Design rates must not be applied to both the base and sides of infiltration structures.</p> <p>A surcharged outfall must be modelled.</p>	Not supplied
Natural catchments design.	<p>The submission must define the natural drainage characteristics within, and hydraulically linked to, the site and demonstrate that the drainage proposals will integrate with and not compromise the function of the natural and existing drainage systems.</p> <p>The condition, performance (including capacity where appropriate) and ownership of any</p>	Not supplied

	<p>existing site surface water drainage infrastructure must be accurately reported.</p> <p>Appropriate easements to watercourses and other services must be shown on all plans.</p> <p>Where there are areas of flood risk from any source on the site, it must be shown how a sustainable surface water drainage design can be accommodated on the site without conflicting with those areas of flood risk.</p> <p>Designs must replicate the natural drainage catchments of the site. All surface water drainage designs must therefore drain via gravity to corresponding points of discharge.</p> <p>The use of pumps for surface water drainage is not sustainable and will not be supported.</p>	
Plans	Plan areas, depths and levels of drainage infrastructure must accurately correspond with the supporting calculations.	Not supplied
Water quality benefits.	An assessment of water quality is necessary to evidence that the proposed design provides adequate treatment of surface water.	Not supplied
Biodiversity and amenity benefits.	The surface water drainage design must provide biodiversity and amenity benefits.	Not supplied
Trees and planting	<p>There should be no conflict between surface water drainage infrastructure and existing or proposed trees or planting.</p> <p>The design must consider the potential growth of proposed trees and adequate mitigation must be provided to protect drainage infrastructure where conflict <u>cannot</u> be avoided.</p>	Not supplied

Additional comments to the planning officer

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' 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.

This consultation has been primarily informed by The SuDS Manual.

No documents have been submitted to support the application with reference to surface water drainage.

It is therefore not possible to assess whether the proposed scale and layout of the development will increase flood risk. As the impact of the proposed development is unknown it is necessary to object in principle to the proposal.

The designer is guided towards our website where guidance and checklists regarding surface water drainage are available. <https://www.arun.gov.uk/surfacewater/>.

From: Nicola Oktay on behalf of Planning.Responses
Sent: 06 June 2025 11:13
To: Planning Scanning
Subject: FW: Planning Consultation on: BE/16/25/RES
Attachments: BE-16-25-RES - Oldlands Farm .docx

Drainage Engineers response

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Planning Receptionist, Planning Department

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Our priorities...



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 05 June 2025 10:30
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Emma Sheppard <Emma.Sheppard@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>; David Easton <David.Easton@arun.gov.uk>
Subject: RE: Planning Consultation on: BE/16/25/RES

Hi Emma,

Find our consultation – an objection in principle – attached. No surface water drainage information has been submitted to support this application and it therefore not possible to assess if the proposal will increase flood risk.

Kind regards

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

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E: sarah.burrow@arun.gov.uk

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Our priorities...



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

Sent: 30 May 2025 13:04

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

Subject: Planning Consultation on: BE/16/25/RES

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BE/16/25/RES
Registered:	3rd March 2025
Site Address:	Land at Oldlands Farm Newlands Road Bognor Regis PO22 9NN
Grid Reference:	494177 101453
Category:	Plan Applicat'n
Description of Works:	Approval of reserved matters following outline consent BE/150/22/OUT comprising of 3 No. units within Class B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, parking, landscaping and sustainable drainage system with access off Newlands Road. This application is in CIL Zone 4 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 14th May 2025 relating to:- Supplementary Drainage Plans.

If you should wish to make further representations as a result of this amendment, please make any further comment by **14th June 2025**.

[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

Emma Sheppard

Planning Case Officer- Arun District Council

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PLRECON (ODB) 2018