

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BE/50/26/DOC	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	David Easton	Date of Review:	22/09/2026
Site Name:	Land At Salt Box West Of Shripney Road Bognor Regis PO22 9FP		
Application Description:	Approval of details reserved by condition under reference BE/135/18/PL (Hybrid) relating to Outline Condition 13 (Surface Water Drainage Verification), Full Condition 15 (Part - Units 6 & 7) (Surface water drainage verification).		
Assessment Number:	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 13: Objection
	Condition 15: Objection

References

The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (Chapter 18). 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	N/A	
2. Interception drainage	N/A	
3. Extreme Rainfall and Flooding	N/A	
4. Water Quality	N/A	
5. Amenity	N/A	
6. Biodiversity	N/A	
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:

- SURFACE WATER DRAINAGE VERIFICATION REPORT 10358131-HDR-XX-XX-RP-C-000001-REVISION P04 DATED 13/08/2026.

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved in respect to condition 13:

-N/A

The following plans/documents should be listed as approved in respect to condition 15:

-N/A

Condition wording

Condition 13 (OUT) is worded as follows:

"Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the Local Planning Authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is built in accordance with the approved details. The scheme shall thereafter be maintained 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"

Condition 15 (FULL) is worded as follows:

"Immediately following implementation of the approved surface water drainage system and prior to occupation of any part of the development, the developer/applicant shall provide the Local Planning Authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved details. The scheme shall thereafter be maintained 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."

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Condition 13 relates to the outline consent area of BE/135/18/PL which was Unit 1 (now Units A-F) and Unit 3. Condition 15 relates to the full consent area which is the remainder of the current application which is Unit 6-7.
3. We have reviewed the revised verification report revision P04 dated 13 August 2026. No written responses to our previous comments have been received.

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

Application Reference: BE/50/26/DOC Site Name: Land At Salt Box West Of Shripney Road Bognor Regis PO22 9FP	Initial Issue Date: 27/09/2026 Issue Date: 22/09/2026 Reviewer Reference: ADC/EXT5/AF
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Summary and Recommendation:

Condition 13: **Objection**

Condition 15: **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	ADC Drainage Comments			
Date:	27/07/2026	22/09/2026			
Condition Number: 13					
Comment Number					
1.	The drainage levels deviate significantly from the approved plans. Calculations are provided for the installed works which show no flooding for the same parameters based upon FSR rainfall. At planning stage a scenario with downstream surcharge was undertaken. This should be replicated in the calculations for the installed works.	A flood-lock outfall surcharge has not been added but appears to only occur from after 700 minutes into the simulation. This is not supported by evidence and is not precautionary in terms of the wider land drainage network.			
2.	Photographic evidence should be provided for the flow control devices in place and in use.	Photos are provided but it is unclear which FCC they relate to, please clarify.			
3.	Evidence should be provided for the permeable paving.	Photos are provided but it is unclear which area they relate to. A reference plan			

		and some commentary is required to confirm that all areas of permeable paving have been installed.			
4.	Evidence should be provided for the petrol interceptors.	Photos now provided, comment closed.			
5.	Evidence of the quantum of crate storage should be provided in addition to the as built plans. This could be photographs during construction, site visit reports, site records.	Photos now provided, comment closed.			
Condition Number: 15					
Comment Number					
1.	The drainage levels deviate significantly from the approved plans. Calculations are provided for the installed works which show no flooding for the same parameters based upon FSR rainfall. At planning stage a scenario with downstream surcharge was undertaken. This should be replicated in the calculations for the installed works.	A flood-lock outfall surcharge has not been added but appears to only occur from after 700 minutes into the simulation. This is not supported by evidence and is not precautionary in terms of the wider land drainage network.			
2.	Photographic evidence should be provided for the flow control device in place and in use.	Photos are provided but it is unclear which FCC they relate to, please clarify.			
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		required to confirm that all areas of permeable paving have been installed.			
4.	Evidence should be provided for the petrol interceptor.	Photos now provided, comment closed.			
5.	Evidence of the quantum of crate storage should be provided in addition to the as built plans. This could be photographs during construction, site visit reports, site records.	Photos now provided, comment closed.			

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 October 2026 12:36
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 Re-Consultation on: BE/50/26/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

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Littlehampton, West Sussex, BN17 5LF
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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 09 September 2026 11:49

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

Subject: Planning Re-Consultation on: BE/50/26/DOC

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BE/50/26/DOC
Registered: 9th July 2026
Site Address: Land At Salt Box West Of Shripney Road Bognor Regis PO22 9FP
Grid Reference: 493790 101639
Category: Discharge of Condi
Description of Works: Approval of details reserved by condition under reference BE/135/18/PL (Hybrid) relating to Outline Condition 13 (Surface Water Drainage Verification), Full Condition 15 (Part - Units 6 & 7) (Surface water drainage verification).

I am able to inform you that I have received an amendment to the above application dated 3rd September 2026 relating to: VERIFICATION REPORT

If you should wish to make further representations as a result of this amendment, please make any further comment by **23rd September 2026**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Mr D Easton

Planning Case Officer-Arun District Council

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Email: david.easton@arun.gov.uk