

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/129/25/DOC	Reviewer Reference:	ADC/EXT4
Planning Officer:	Kathryn Welch	Date of Review:	21/11/2025
Site Name:	5-11 Aronel Cottage Nursing Home Highfield Road Bognor Regis PO22 8BQ		
Application Description:	Approval of details reserved by condition imposed under reference BR/159/22/PL relating to condition number 7 - surface water drainage scheme.		
Assessment Number:	2 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 7: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Compliant	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection
4. Water Quality	Compliant	No 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:

- Foul and Surface Water Drainage Report - Ref:C2128 Rev-P1 28th May 2025
- Foul and Surface Drainage Report Ref:C2128 Rev.P2 (8th August 2025)
- email 16.10.25 sub drainage report
- EMAIL 3.11.25 floatation calcs
- EMAIL 15.10.25 FEH data
- EMAIL 10.11.25 subplans
- Groundwater Monitoring - C2128 (GWM)
- Floatation Calculations
- Drainage Report C2128 Rev P3 October 2025
- Drainage Layout C2128 100 P2

Condition wording

Condition 7 is worded as follows:

“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been 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. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council, and are an overriding factor in terms of requirements. 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 / No part of the extended 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. 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.”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. **The drainage proposals do not appear to consider the impacts of existing trees and proposed planting, which could result in clashes with the drainage**

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: BR/129/25/DOC Site Name: 5-11 Aronel Cottage Nursing Home Highfield Road Bognor Regis PO22 8BQ	Initial Issue Date: 21/11/2025 Issue Date: 21/11/2025 Reviewer Reference: ADC/EXT4
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Summary and Recommendation:

Condition 7: **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	ADC Drainage Comments	Designer Response	
Date:	25/09/2025	17/10/2025	21/11/2025		
Condition Number: 7-					
Comment Number					
1.	The current groundwater monitoring only ranges from the end of October to the end of January. We suggest that groundwater is monitored until the end of March to ensure that the peak level is captured. Please submit evidence that the peak groundwater level for that season has been captured or provide additional groundwater monitoring for the full winter regime ie. till end of March.	Additional GWM results added. Included results to end of March	Item now closed		
2.	Please provide a plan on the location of the groundwater monitoring and depths in relation to the drainage proposals. The current proposal for permeable paving does not appear to provide the minimum 1m depth separation to the peak groundwater level, which will not	Included the location of the groundwater monitoring well in addition to the location of the infiltration test.	Noted, please provide design formation levels on the drainage layout drawing for the permeable paving. This is to ensure that		

	be acceptable and alternative means of discharging this permeable paving will need to be considered.	The permeable paving has been retained, however, it has been slightly altered to not infiltrate to ground and to only be utilised as an attenuation feature. The distribution tank will be utilised to convey water between the sub-base and S3.	the formation of the permeable paving is designed to fall towards the diffuser unit		
3.	No infiltration testing has been provided to support the proposed permeable paving design. Please provide winter infiltration testing in accordance with BRE365	Infiltrating permeable paving has been removed. It is now a storage feature acting as a blanket attenuation tank.	Noted and item now closed		
4.	Submit the FEH 22 point data files for this site, in accordance with clause 5.1.7 of the FEH Web Service terms of use (https://fehweb.ceh.ac.uk/Home/Terms). These must be submitted directly to land.drainage@arun.gov.uk rather than to the planning portal (via the planning officer), this is to ensure that the data remains confidential in accordance with those terms.	Noted – will submit.			
5.	Please provide buoyancy calculations for the attenuation tank	Polypipe has been approached for these and the calculations will follow.	Noted and item now closed		
6.	Please provide permeable paving calculations	This is included within the calculations.	Noted item now closed		
7.	The permeable paving detail on drawing C2128-P-300-P1 indicates that	The detail indicated a permeable geotextile	Noted item now closed		

	a geo-membrane is to be laid above the formation, yet the drainage statement notes that the permeable paving is designed to infiltrate, please clarify or correct as required	above the formation. This is standard and will allow runoff to infiltrate into the sub-base. This detail has been revised to suit the changes to drainage design.			
8.	The permeable paving, ACO drain and pipework appears to clash with potential root protection areas. Please clearly define the RPA's on the drawing and review drainage to ensure there are no clashes with existing or proposed trees. Where clashes cannot be avoided but root damage may be mitigated please show this mitigation clearly on the plans and provide construction details for it.	An arboriculture report not undertaken and root protection areas have not been defined. No plans present on the planning portal.	An assessment on the impacts will need to be undertaken		
9.	An orifice of 21mm diameter increases the risk of blockage and may result in surface flooding. Please consider the use of a vortex flow control to mitigate the risk of blockage	A vortex flow control chamber has now been specified. Please note that Causeway Flow only has Hydro-Brake as a vortex flow control option so this has been utilised on the calculations. This results in the final chamber being specified as a 1200 dia manhole. Turtle Enviro sell 450mm dia vortex flow controls which have been specified on the drawing.	Further details need to be provided on this option. Clarification on how blockage is going to be avoided. i.e. is there going to be a filter medium fitted to the control?		
10.	The attenuation tank detail needs to show the levels and cross reference accordingly to the plan	Revised to suit.	Noted item now closed		

11.	Please review the location of S2 and look to relocate this further west to avoid an external 90 degree bend in the pipework	Shifted west.	Noted item now closed		
12.	The gradients provided in the calculations do not correspond with the design gradients on the plan. Please update calculations to suit.	Revise to suit.	Noted item now closed		
13.	Please provide details on SuDS considered for source control or promote bio-diversity for the runoff from the roofs. Have raingardens been considered?	Due to groundwater levels and depth of drainage/usable space, it is believed that this is not viable. Whilst it would be beneficial to get some open SuDS features, there is little room for this on the proposed extension.	Have raingardens to treat roof water run-off been considered? Such features do not need to take a significant area of usable space and can be sought to be combined with the proposed planting?		

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.

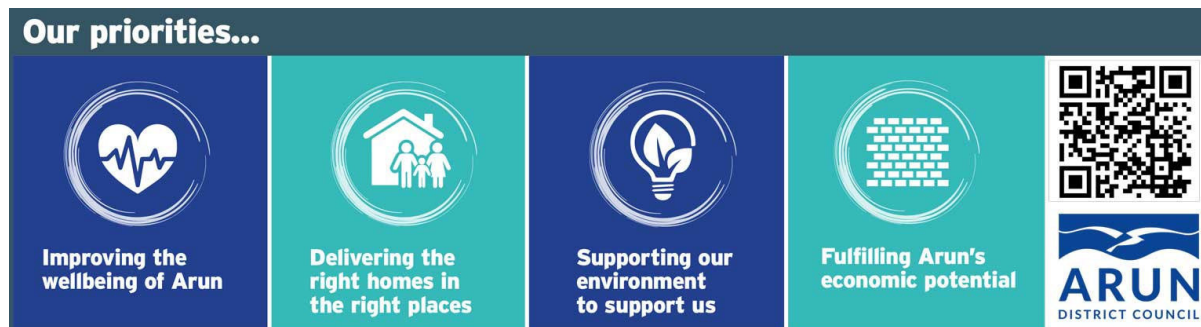
[REDACTED]

Drainage Engineers response

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 21 November 2025 17:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Kathryn Welch <Kathryn.Welch@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Re-Consultation on: BR/129/25/DOC

Hi Kathryn,

Find the consultation response – an objection – attached.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

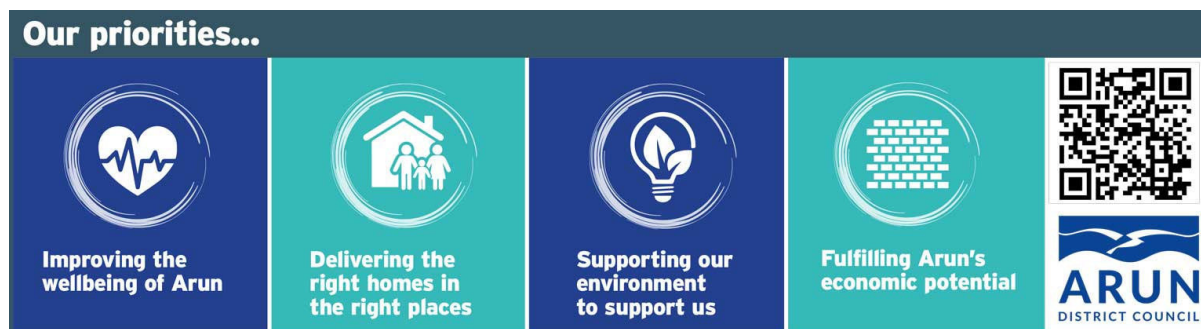
Kind regards

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

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

Sent: 17 October 2025 12:16

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

Subject: Planning Re-Consultation on: BR/129/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BR/129/25/DOC
Registered:	25th July 2025
Site Address:	5-11 Aronel Cottage Nursing Home Highfield Road Bognor Regis PO22 8BQ
Grid Reference:	493725 99887
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition imposed under reference BR/159/22/PL relating to condition number 7 - surface water drainage scheme.

I am able to inform you that I have received an amendment to the above application dated 16th October 2025 relating to: Substitute drainage report and additional comment tracker

If you should wish to make further representations as a result of this amendment, please make any further comment by **31st October 2025**.

[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

Kathryn Welch

Planning Case Officer-Arun District Council

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Email: kathryn.welch@arun.gov.uk

PLRECON_DOC (ODB) 2020