

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/201/25/PIP	Reviewer Reference:	ADC/EXT3/RW
Planning Officer:	Simon Davis	Date of Review:	21/01/2025
Site Name:	Longbrook Pavillion Hook Lane Bognor Regis PO22 8AT		
Application Description:	Application for permission in principle for a minimum net gain of 0 dwellings to a maximum net gain of 8 No dwellings.		
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

Further information required

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

It is acknowledged that this permission seeks to determine the principle of development only. That is the scope of permission in principle is limited to location, land use and amount of development. As surface water drainage design can directly impact the size and scale of development, these comments are relevant to the location and amount of development only.

Where the quantum of development is not being approved, an objection to a permission in principle is only made where:

- a viable runoff disposal location has not been evidenced,
- flood risk may be impacted by the proposal,
- surface water drainage may impact the proposed development scale and layout, or;
- a significant impact upon existing watercourses or natural drainage features is identified

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	Insufficient	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:

- FRA
- APPEAL DECISION FOR TA/2024/512
- OFFICER REPORT FOR BR/242/21/OUT
- LOCATION AND BLOCK PLANS REV00

Consultation comments to the planning officer

0. General

- 0.1. Section 9 of the flood risk assessment notes the risk of flooding to offsite developments, it is noted that the development is lacking a viable drainage strategy at this stage, without any information related to existing sewers or the permeability of the existing ground we are unable to validate there is a viable drainage scheme.

1. Runoff destination

1.1. The existence of infrastructure would indicate there is available runoff destinations in the vicinity of the site but further information would be required to confirm this prior to acceptance.

2. Interception drainage

2.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, it is not a reason for objection and can be assessed when an application for reserved matters is made.

2.2. Consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development. Interception drainage ensures that rainfall from regular rainfall events does not leave the site. This replicates greenfield conditions and goes hand in hand with the management of extreme rainfall events to ensure that development does not increase flood risk.

2.3. Where infiltration has not been proven to be viable (as here) and there is a risk that interception drainage may only be delivered by evapotranspiration this can have significant impact on the scale and layout of the proposed development.

OR

Where infiltration is a viable means of surface water disposal (as here), this is assumed to deliver interception drainage. This standard is therefore unlikely to impact the development of the scale and layout of the development on this site.

3. Extreme rainfall and flooding

3.1. Development located within flood zone 3, EA to be alerted and potential for conditions related to flood prevention.

4. Water quality

4.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, it is not a reason for objection and can be fully assessed when an application for reserved matters is made.

4.2. The later submitted water quality and proposed treatment assessment must assess each sub-catchment and their treatment methods where different parts of the site receive different treatment regimes. The designer should aim to treat all rainwater as close to source as possible. **Open features which aid water treatment can impact the scale and layout.**

5. Amenity, Biodiversity, Construction and Maintenance

5.1. These standards cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, they are not a reason for objection and can be assessed when an application for reserved matters is made.

5.2. Each of these standards can impact the scale and layout of the proposed development and the applicant and design team are encouraged to familiarise themselves with our guidance and checklists to avoid objection when a reserved matters application is made.

6. Suggested conditions / Overcoming the objection

6.1. 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.

6.2. 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.

6.3. 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.

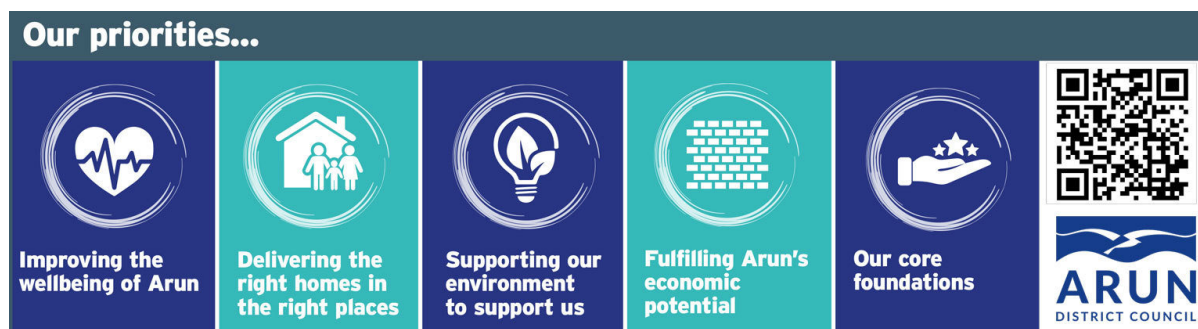
It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☒ 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

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>



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From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 21 January 2026 10:39

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

Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Daun Johnson <Daun.Johnson@arun.gov.uk>

Subject: RE: Planning Consultation on: BR/201/25/PIP

Please find enclosed our external consultants response, which is essentially an objection due to a lack of information provided in terms of any viable proposed surface water drainage scheme.

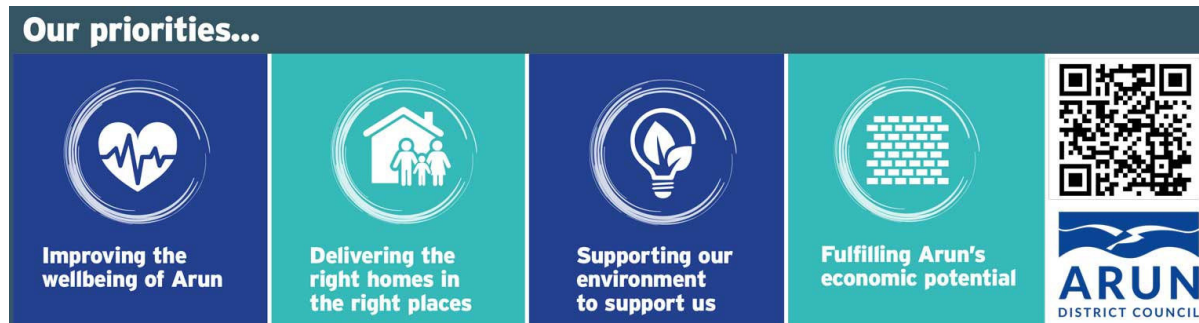
Regards

Paul Cann

Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: 10 December 2025 08:19

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

Subject: Planning Consultation on: BR/201/25/PIP

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

The Planning Act 1990

The Town and Country Planning (Permission in Principle) Order 2017(as amended) - Article 5J

Consultations in relation to applications for Permission in Principle

Permission in Principle

Application No: BR/201/25/PIP

Registered: 8th December 2025

Site Address: Longbrook Pavillion Hook Lane Bognor Regis PO22 8AT

Grid Reference:

Description of Works: Application for permission in principle for a minimum net gain of 0 dwellings to a maximum net gain of 8 No dwellings.

The Council has received the above Permission in Principle application. Permission in Principle applications are limited to the consideration of the 'in principle' matters of location, land use and amount of development. If approved, other matters would be considered at the technical detail application stage. If you wish to be consulted again at the technical detail stage, you must indicate this in your response as the council is only required to consult if specifically requested. This application needs to be determined within 5 weeks and only has a 14 day consultation period.

[Click here to view the application details and 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.

Should you have any comments to make, these should be sent by replying to this email by 29th December 2025 . You can also monitor the progress of this application through the Council web site:

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan>

as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-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.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website:<https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

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

Yours sincerely

Mrs D Johnson

Planning Officer- Arun District Council

Telephone: 01903 737762

Email: daun.johnson@arun.gov.uk

PLCONSULT (ODB) 2020