

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/229/25/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Amber Willard	Date of Review:	16/02/2026
Site Name:	45 High Street Bognor Regis PO21 1RU		
Application Description:	Construction of 6 No apartments (resubmission following BR/156/25/PL). This application is in CIL Zone 4 (Zero Rated) as flats.		
Assessment Number:	1		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

Reviewed Plans

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

-LOCATION AND BLOCK PLANS, EXISTING FLOOR PLANS AND FRONT AND REAR ELEVATION WATD-001-P

-LOCATION AND BLOCK PLANS, PROPOSED FLOOR PLANS, ELEVATIONS, ROOF PLAN WATD-003-P

-PROPOSED FRONT AND REAR ELEVATION, SECTION AND STREET SCENE WATD-004-P
-FRA

Consultation comments to the planning officer

0. General

0.1. The development is for a block of six apartments. The existing site is entirely impermeable and the development will not affect drainage offsite.

0.2. The development site is within Flood Zone 3 (High Risk) within the lifespan of development and requires Sequential Testing and Exception Testing. Advice will be provided by the Environment Agency for flood risk from rivers and seas.

0.3. The Council will need to consider Sequential Testing requirements for residential development within Flood Zone 3 and should take advice from the Environment Agency regarding whether the development will remain safe for its lifespan.

0.4. The risk from surface water is acceptable.

1. Runoff destination

1.1. The submission does not confirm the proposed method of disposal of surface water but the site is currently entirely impermeable.

1.2. The reuse of existing outlets is likely to be acceptable but we need to ensure the discharge is to a surface water sewer and not a foul or combined sewer. This can be controlled by condition.

2. Interception drainage

2.1. Interception drainage is not required.

3. Extreme rainfall and flooding

3.1. Storage of large return period storms is not required.

4. Water quality

4.1. The runoff from the development from roofs to public sewer does not require water quality treatment.

5. Amenity

5.1. Amenity value through sustainable drainage design is not required.

6. Biodiversity

6.1. Biodiversity value through sustainable drainage design is not required.

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

7.1. No planning stage requirements are raised.

8. Suggested conditions / Overcoming the objection

Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The full details submitted for approval shall include:

1, Detailed drainage plans conforming to Local Planning Authority guidance.

2. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,

3. Any relevant permissions relating to the discharge location, offsite works or adoption.

The scheme shall then be constructed as per the approved plans.

The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority.

Reason: In order to comply with Arun Local Plan policies (W DM3) and the NPPF.

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
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<https://www1.arun.gov.uk/planning-application-finder>

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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	 Our core foundations	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 16 February 2026 12:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/229/25/PL

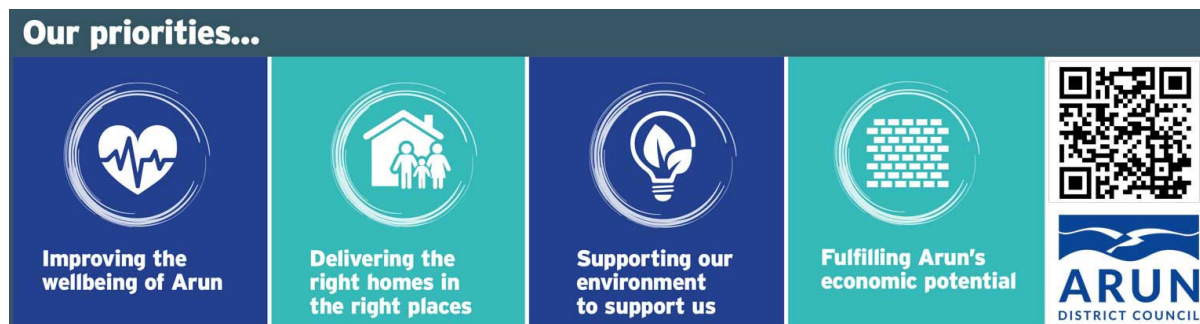
Please find enclosed our consultants response, no objection subject to condition.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: 20 January 2026 09:05

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

Subject: Planning Consultation on: BR/229/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: BR/229/25/PL

Registered: 15th January 2026

Site Address: 45 High Street Bognor Regis PO21 1RU

Grid Reference: 493569 98990

Description of Works: Construction of 6 No apartments (resubmission following BR/156/25/PL). This application is in CIL Zone 4 (Zero Rated) as flats.

The Council have received the above application.

[Click here to view the application 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 19th February 2026 . You can also monitor the progress of this application through the Council web site:

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

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

Amber Willard

Planning Officer- Arun District Council

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Email: amber.willard@arun.gov.uk

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