

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/24/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Simon Davis	Date of Review:	21/09/2026
Site Name:	Tesco Superstore Shripney Road Bognor Regis PO22 9ND		
Application Description:	Installation of single storey raised car park deck together with site alterations, car park reconfiguration, new access into car park, drainage alterations, creation of new drainage outfall, landscaping and other associated works.		
Assessment Number:	2 of 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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Compliant	No objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to condition

Reviewed Plans

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

- LOCATION PLAN 245201-IDL-XX-DR-A-P1001-S3-P05
- PROPOSED DRAINAGE ALTERATIONS PART 3-
- PROPOSED DRAINAGE ALTERATIONS 164842/0211 REVC
- LANDSCAPE GENERAL ARRANGEMENT PLAN 30268440-ARC-P01-XX-DR-LA-0004 REV7
- TOPOGRAPHICAL SURVEY
- EXISTING BLOCK PLAN 245201-IDL-01-XX-DR-A-E1002-S3-P02
- EXISTING SITE SECTIONS 245201-IDL-01-XX-DR-A-E1009-S3-P01
- Planning Statement (including Waste Infrastructure Statement) 21 Jan 2026
- FRA, uploaded in 3 parts, via public planning portal
- PROPOSED DRAINAGE ALTERATIONS, uploaded in 9 parts, via public planning portal
- DECKED CAR PARK FLOOD RISK MITIGATION SCHEME

Consultation comments to the planning officer

0. General

- 0.1. We are aware of the continued objection from WSCC as the LLFA which will need to be overcome before we can look to remove our objection.
- 0.2. The surface water discharge from the entire site is proposed to be reduced from an existing peak pumped rate of 266l/s to a greenfield peak rate of 9.1l/s. This is a significant reduction in the peak run-off, not just from the car parking area within the applicant's planning boundary but from the wider site itself. This is expected to provide a betterment in terms of downstream surface water flood risk and this betterment and increased attenuation of the onsite rainfall should be welcomed by the Local Authority.
- 0.3. As advised during the pre-application process the proposals fail to meet all the requirements of the NSfS due to the existing nature of the site, whilst this would generally result in an objection due to non-compliance with the NSfS, the Planning Officer will need to make a balanced view in determining the application since there are significant surface water flood risk betterments provided with these proposals and whilst the onsite proposals do not improve on the existing interception or amenity value of the car park, they don't increase the detriment either.

1. Runoff destination

- 1.1. Whilst surface water pumping is only considered in exceptional circumstances, the applicant has provided details on the various alternative options that have been considered and thus we are satisfied that the pumping solution is required.

2. Interception drainage

- 2.1. The interception assessment has been updated however it is still not acceptable as it does not assess the suitability of methods that intercept surface water via evapotranspiration only. These can include permeable paving or open vegetated surfaces. It is unclear why permeable paving cannot be used for interception purposes, water treatment and additional storage.

3. Extreme rainfall and flooding

- 3.1. As noted by the LLFA, despite the betterment offered by the drainage design in terms of significantly reduced pumping rates, the design evidences potential flooding on the 3.33% AEP + CCA event. Our previous consultation offered a balanced view due to the significant betterment when it should have been a technical objection. As such, this is corrected for consistency with the LLFA.
- 3.2. It is noted that the designer has not used the expected and normal climate change allowance of 40% for this event and as such the flooded volume is likely to be greater. The justification for the proposed climate change allowance of 25% is not offered, it is recommended that this is clarified, particularly if it relates to the design life of the development.
- 3.3. The impact of the flooding of the system cannot be reliably assessed from what has been submitted. The designer has submitted calculations relating to the existing site model but, these do not model the same events as the proposed system. Nor does it use the same design parameters/settings. To understand if the modelled flooding on the proposed design is an increase in flood risk it is important to have a comparison with the expected performance of the existing system.
- 3.4. The designer's assertion that predicted flooding elsewhere within the wider the network 'lies outside the application boundary and is therefore not directly affected by the application area' is not accurate. The proposed drainage alterations alter the discharge rate and thus the drainage

performance for the whole site. If the site would not currently flood for the 3.33% AEP + CCA, or the 1% AEP + CCA with a higher discharge rate, then flood risk on site may be increased. Furthermore, potential flooding of areas in the vicinity of the petrol station carry increased risk of water pollution. It is important to understand if this risk is increased following changes to the drainage system, or if it existed before.

3.5. As this is a brownfield site, there is scope for a relaxation of the standards relating to the discharge rate which may enable the designer to meet the criteria of not flooding on the critical 3.33% AEP + CCA event. This would result in an increase in the discharge rate for all events which may be less desirable to the LPA.

3.6. The current 3.33% AEP + CCA model assumes the discharge rate of 9 l/s, when the designer has acknowledged that the existing 266 l/s pumps will remain in place and be activated under exceptional circumstances. It is not clarified what these exceptional circumstances will be aside from 'post-fluvial flooding', however, it is not unreasonable to assume the larger pumps will function following or during a 3.33% AEP + CCA event which would render the submitted modelling academic.

3.7. It is advised that the following is submitted to aid assessment:

- Existing drainage model, (50% AEP, 3.33% AEP + CCA, 1% AEP + CCA) with comparable inputs to proposed (FEH22 rainfall data, same climate change allowances as proposed, CV values of 1, Design storm duration up to 10080 min).
- Justification for climate change allowances.
- Updated drainage design to demonstrate no flooding on critical 3.33% AEP + CCA event and that any flooding of the critical 1% AEP + CCA is contained safely on site without increasing flood risk. OR an explanation as to why any flooding of these events may be acceptable and could be justified by the planning officer (linked to the NPPF).
- Clarification on the threshold and criteria for when the 226 l/s pumps will be engaged and whether this is likely to affect the proposed design.

4. Water quality

4.1. We are satisfied that the use of by-pass oil separators will address water quality from the run-off from the car parking area.

5. Amenity

5.1. The applicant has clarified that no above ground SuDS features are proposed and that the proposed landscaping does not form part of the SuDS strategy. Any inconsistencies between the plans are therefore inconsequential. However, the lack of any form of amenity offered by the SuDS results in an unavoidable objection.

6. Biodiversity

6.1. This has not been assessed and does not meet the requirements of the NSfS.

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

7.1. A detailed SuDS maintenance and management plan may be agreed via condition.

8. Suggested conditions / Overcoming the objection

8.1. 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.

8.2. 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.

8.3. 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

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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 21 September 2026 13:55
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/24/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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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



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 15 June 2026 11:48
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BR/24/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BR/24/26/PL
Registered: 3rd March 2026
Site Address: Tesco Superstore Shripney Road Bognor Regis PO22 9ND

Grid Reference: 493829 100548
Category: Plan Applicat'n
Description of Works: Installation of single storey raised car park deck together with site alterations, car park reconfiguration, new access into car park, drainage alterations, creation of new drainage outfall, landscaping and other associated works.

I am able to inform you that I have received an amendment to the above application dated 12th June 2026 relating to:- Response Document to Drainage Consultations

If you should wish to make further representations as a result of this amendment, please make any further comment by **30th June 2026**.

[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

Mr S Davis

Planning Case Officer- Arun District Council

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