

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/24/26/PL	Reviewer Reference:	ADC/EXT4
Planning Officer:	Simon Davis	Date of Review:	22/04/2026
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:	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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	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:

- 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 current objection from the Environment Agency in terms of requiring further information relating to the flood mitigation. This objection along with that from WSCC as the LLFA 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. This does not meet the requirements of the NSfS

3. Extreme rainfall and flooding

- 3.1. The proposed discharge rate and attenuation storage is acceptable and provides a key betterment to the existing situation as well as exceeding the requirements set out by the NSfS for brownfield sites

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 proposed planting and soft landscaping presented in the Arcadis Flood Risk Assessment and mitigation proposals does not appear to be reflected in the Fairhurst Drainage Alteration plan. Clarification is required on what soft landscaping is proposed and whether central planted bioretention areas are being proposed per the Arcadis proposals.

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. Further details and clarification on soft landscaping and potential drainage benefits these may provide is required as noted in item 5.1 above

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

From:
Sent:
To:
Subject:
Attachments:

Elaine Walby on behalf of Planning.Responses
23 April 2026 12:27
Planning Scanning
FW: Planning Consultation on: BR/24/26/PL
BR-24-26-PL - Tesco Superstore Shripney-26-04-22.docx

PL- Consultation- Engineers response

Elaine Walby
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Planning Services

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Our priorities...



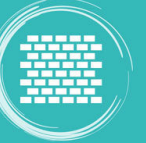
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From:
Sent:
To:
Cc:
Subject:

Paul Cann <Paul.Cann@arun.gov.uk>
23 April 2026 12:14
Planning.Responses <Planning.Responses@arun.gov.uk>
Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
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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E: paul.cann@arun.gov.uk

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From:
Sent:
To:
Subject:

Planning.Responses <Planning.Responses@arun.gov.uk>
03 March 2026 14:34
Land Drainage <Land.Drainage@arun.gov.uk>
Planning Consultation on: BR/24/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Planning Permission

Application No:	BR/24/26/PL
Registered:	3rd March 2026
Site Address:	Tesco Superstore Shripney Road Bognor Regis PO22 9ND
Grid Reference:	493829 100548
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.

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 2nd April 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

Mr S Davis

Planning Officer- Arun District Council

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Email: Simon.Davis@arun.gov.uk