

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/41/26/PL	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Amber Willard	Date of Review:	29/04/2026
Site Name:	Belmont Lodge, Belmont Street, PO21 1LE		
Application Description:	Retention of a single storey office building.		
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	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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection subject to conditions
5. Amenity	Insufficient	No objection subject to conditions
6. Biodiversity	Insufficient	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

- **Surface Water Drainage Statement April 2026 V2**
- **Proposed Site Plan**

Consultation comments to the planning officer

0. General

0.1. Details have now been submitted explaining that the carpark is afforded a soakaway in an approximately location of the vehicular access into site.

1. Runoff destination

1.1. It is proposed to discharge surface water falling on the roof of the office building to an existing soakaway found on site, located under the carpark. Water collected in the soakaway is then infiltrated into the ground. While infiltration is the highest priority discharge location (except for water re-use) and accords with Standard 1 of the NSfS, insufficient information has been provided to ensure the existing system is appropriate for its intended use. As insufficient evidence has been

submitted to demonstrate how the applicant intends to drain surface water, we are unable to assess whether the proposed development would increase flood risk. It is the responsibility of the applicant or their drainage designer to provide this evidence. For this reason, **we object** to the proposal, as the submission of such evidence may affect the scale and layout of the development.

- 1.2. Evidence of ground conditions along with evidence of the existing drainage system will be required. Without understanding ground conditions or the capacity or contribution areas of the existing system, it is not possible to ensure that flood risk is not being increased.
- 1.3. To support an infiltration-based design, winter groundwater monitoring must be undertaken to confirm that a minimum of one metre of unsaturated ground can be maintained between the base of the soakaway or infiltration structure and the peak groundwater level. Ground conditions and infiltration potential in Bognor are highly variable. While infiltration may be feasible in some areas, others experience high groundwater levels or poor infiltration rates that render it unviable. This must be robustly demonstrated by the applicant.
- 1.4. If infiltration is not viable, then alternative sustainable means of draining the site are summarised as follows:
 - Water reuse – not proposed but will not provide a full design solution and can be secured via condition.
 - Infiltration – Proposed but not investigated.
 - To a watercourse – none available.
 - To a surface water sewer – available within highway
 - To a highway drainage system – none available according to our records.
 - To a combined sewer – available within highway.
- 1.4 It is essential that each discharge destination is considered in strict priority order, with higher priority options fully explored and demonstrably exhausted before progressing to lower priority alternatives. Robust evidence must be provided to discount a higher priority destination.
- 1.4 A public surface water sewer and combined sewer can be found in the highway to the front of site. No information regarding this option has been submitted. If infiltration is not viable, the applicant would need to investigate the possibility of connecting surface water to the sewer at the front of the site including undertaking a hydraulic capacity check. The applicant would also need to demonstrate that a gravity connection is achievable. No information regarding this option has been submitted.

2. Interception drainage

- 2.1. Interception features should be included within the SuDS design, as no details have been provided then we are unable to assess this information. However, in recognition that the National Planning Policy Framework states that SuDS should be proportionate to the nature and scale of the proposal we are willing to accept that the following interception features can demonstrate compliance without further detailed assessment.
 - Infiltration features designed to meet extreme rainfall standards.
 - Water butts or other means of reuse that are not designed for regular daily demand attached to all new downpipes.
 - Raingardens and bioretention features attached to all new downpipes.

- Permeable surfacing.

2.2. These features will not affect the scale or layout of development and as such can be secured by condition.

3. Extreme rainfall and flooding

3.1. The site is not located within a present-day Flood Zone (FZ); however, by 2061 the southern boundary of the site will fall within FZ3a, and by 2111 the area where the office is located will also be within FZ3a during the defended scenario. New data is currently being published which is expected to show the undefended scenario plus Climate Change which is likely to entirely engulf the site's extents.

3.2. Notably, the approximate location of the existing soakaway lies within the future flood risk area (defended). SuDS should not be sited in areas of flooding as during a flood event this could result in the loss of either floodwater or surface water SuDS storage. This would mean that the features could be inundated by floodwater prior to runoff entering them, or vice versa, thereby rendering them ineffective. One exception to this rule is if the risk of flooding is isolated to tidal sources only. Product 4 data from the Environment Agency should be requested by the applicant to identify the source of flood risk involved on site.

3.3. The south-western boundary also sits between low (between 0.1% - 1% AEP) to medium risk (between 1%-3.3% AEP) of surface water flooding. When Climate Change is added by 2040 small areas of high risk will interact with the building. No Flood Risk Assessment has been submitted for review.

3.4. The design must either account for additional surface water volume entering the site from elsewhere or ensure that no SuDS features are located in this area and that levels are not altered. For further guidance, please refer to our SuDS in Flood Areas document available online at www.arun.gov.uk/surfacewater.

3.5. At present, no modelling or supporting evidence; such as ground investigations or drainage plans have been submitted for engineering assessment. In the absence this evidence, we cannot assess if flood risk will be increased by the surface water drainage of the proposed development. Therefore, this application does not accord with the NPPF as set out above and **we object** to the proposal.

4. Water quality

4.1. Insufficient evidence of water quality benefits has been provided, and as such, Standard 4 of the NSfS has not been met. However, the submission of this evidence is unlikely to affect the scale or layout of the development. Therefore, we do not object to the proposal on these grounds, subject to a condition securing the provision of details demonstrating water quality benefits.

5. Amenity

5.1. Insufficient amenity benefits arising from the proposed SuDS have been identified, and therefore Standard 5 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of amenity benefits.

6. Biodiversity

6.1. Insufficient biodiversity benefits arising from the proposed SuDS have been identified, and therefore Standard 6 of the Systems NSfS has not been met. However, the submission of such evidence is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing details of biodiversity benefits.

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

7.1. Insufficient information regarding the construction, operation and maintenance of the SuDS system, and therefore Standard 8 of the Systems NSfS. However, in the absence of significant existing trees which could impact the scale and layout and location of SuDS features, most elements of this standard can normally be secured via condition. The submission of a Management and Maintenance Plan is unlikely to affect the scale or layout of the development. Accordingly, we do not object to the proposal on these grounds, subject to a condition securing the detailed surface water drainage design.

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: Elaine Walby on behalf of Planning.Responses
Sent: 07 May 2026 17:09
To: Planning Scanning
Subject: FW: Planning Consultation on: BR/41/26/PL
Attachments: BR-41-26-PL Belmont Lodge (3).docx

PL- Consultation- Engineers response

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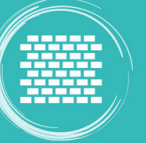
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 06 May 2026 16:18
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/41/26/PL

Please find the engineer’s consultation attached; an objection.

Many thanks,

Kathryn Welch
Senior Planning Officer, Planning Department

Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 24 April 2026 14:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BR/41/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BR/41/26/PL
Registered:	24th March 2026
Site Address:	Belmont Lodge Belmont Street Bognor Regis PO21 1LE
Grid Reference:	493744 99036
Category:	Plan Applicat'n
Description of Works:	Retention of a single storey office building. This application may affect the setting of a listed building and is in CIL Zone 4 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated 23rd April 2026 relating to:- Drainage statement and plan showing soakaway

If you should wish to make further representations as a result of this amendment, please make any further comment by **17th May 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

Amber Willard

Planning Case Officer- Arun District Council

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