

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/53/26/PL	Reviewer Reference:	12/05/2026
Planning Officer:	Amber Willard	Date of Review:	ADC/EXT5/AF
Site Name:	57 Queensway Bognor Regis PO21 1QN		
Application Description:	Demolition of existing brick-built garages, removal of canopy structure, remediation of contaminated land and construction of 18 No flats over 3 storeys with pitched roofs (resubmission following BR/67/25/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	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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 subject to conditions
5. Amenity	Insufficient	No Objection
6. Biodiversity	N/A	No Objection
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:

- ENGINEERS COMMENTS REGARDING SURFACE WATER DRAINAGE
- DRAINAGE STRATEGY
- REMEDATION STRATEGY AND VERIFICATION PLAN
- FRA

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

N/A

Consultation comments to the planning officer

0. General

0.1. We note the previous application under BR/67/25/PL and our comments dated 26 November 2025.

1. Runoff destination

- 1.1. Rainwater butts are provided and are sufficient water reuse for the water demand at the development.
- 1.2. Infiltration is ruled out by high groundwater and we support the connection to public sewer, which is confirmed by capacity check as acceptable to Southern Water.
- 1.3. The runoff destination is acceptable.

2. Interception drainage

- 2.1. The parking area is permeable which allows for the self-drained area.
- 2.2. NSfS confirms that water butt do not provide interception. There are planters provided for the residential roof drainage but no calculation to confirm the development meets the requirements of the NSfS. Calculations should be provided in the Drainage Statement.
- 2.3. Evidence has not been provided to justify the lack of interception drainage provided as part of the sustainable drainage design. Interception drainage is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.
- 2.4. Please note, consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development.
- 2.5. Where infiltration is not viable, there is a risk that interception drainage may only be delivered by evapotranspiration. No SuDS features which allow evapotranspiration are proposed. No departure from the national standards from SuDS has been requested. It is unclear where interception features may be included within the proposed scale and layout.

[UW Response: Drainage Strategy DS\[U0560\]-V3 has been updated, with green roofs proposed on the entire development flat roof \(refer to typical details\), including the bin store, to provide the necessary interception for the roof area.](#)

3. Extreme rainfall and flooding

- 3.1. In the current drainage modelling, the 50% and 1% AEP peak flows are within the greenfield runoff peak flows for the corresponding event, which is acceptable.
- 3.2. The assessment does not use the latest rainfall data and may therefore underestimate the design storm. The latest FEH rainfall data should be used in accordance with ADC SuDS guidance.
- 3.3. The mass balance is low and may indicate losses. This should be rectified or explained.
- 3.4. Calculations should be updated and resubmitted to demonstrate satisfactory accommodation of the design storm.
- 3.5. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

[UW Response: Drainage Strategy DS\[U0560\]-V3 has been updated with FEH-22 rainfall data, refer to Appendix C and D.](#)

4. Water quality

- 4.1. Water quality mitigation is acceptable.

5. Amenity

- 5.1. No mitigation or specific design is proposed for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system in the Drainage Statement.

5.2. Whilst the opportunities on a site such as this may be limited, there should be consideration of this aspect of sustainable drainage design and incorporation where feasible.

5.3. Water butts, SuDS planter and permeable paving provide limited amenity value. Due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is proportionate / sufficient.

6. Biodiversity

6.1. A BNG exemption is submitted with the application as the existing site is entirely paved.

6.2. The proposed SuDS planter provide limited biodiversity value. Due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is sufficient / not required.

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

7.1. An outline maintenance and operation plan is incorporated within the drainage statement. This will need to be updated if the design changes and incorporate information on ownership and management responsibilities.

7.2. The outline plan does not currently include information on ownership and maintenance responsibility for shared infrastructure. This should be provided clarified within the plan at discharge of conditions stage.

7.3. A detailed Management and Maintenance Plan can be conditioned as part of the technical design and assessment to be submitted at approval of details stage.

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