

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/5/26/PL	Reviewer Reference:	ADC/KW/PC
Planning Officer:	Harry Chalk	Date of Review:	27/03/2026
Site Name:	35 Glamis Street, Bognor Regis, PO21 1DJ		
Application Description:	New build 2 storey residential townhouse comprising of 1 No 2b/3p and 1 No 3b/5p flats.		
Assessment Number:	1 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
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:

Flood Risk Assessment and Surface Water Drainage Strategy: New-build 3 Storey Townhouse

Consultation comments to the planning officer

0. General

0.1. Insufficient information regarding surface water drainage has been submitted to evidence that flood risk will not be increased as due to the proposed development.

1. Runoff destination

1.1. Infiltration at source, including permeable paving and infiltration to soakaway, are proposed. Source control features such as rainwater butts, permeable paving, and soft landscaping are also proposed. We support this approach in principle; infiltration is the highest priority in the drainage hierarchy and aligns with Standard 1 of the Non-Statutory Technical Standards for SuDS (NSfS). However, insufficient evidence has been provided to demonstrate that infiltration is a viable solution.

- 1.2. It is the responsibility of the applicant or their drainage designer to provide this evidence. Without it, we are unable to assess whether the proposed development would increase flood risk. Without this information at this stage, it cannot be ensured that the proposed layout and scale of development are feasible.
- 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. Even where infiltration is viable, space on this site is highly constrained, and apart from blanket soakaways for areas of hardstanding (which can be positioned within 5 m of buildings), soakaways are unlikely to be viable within such a limited site area. However, it is noted that there is an irregularity in the plans, and at this stage we are not certain whether the garage buildings to the rear of the site will be retained. Should these be demolished as part of the proposal, additional space for soakaways may become available.
- 1.5. Soakaways must be located at least 5 m from buildings and highways. The block plan indicates that the building will be less than 1 m from the proposed structure and will abut an existing garage. Furthermore, the proposed structure may disrupt existing soakaways on the site, which have not been assessed for the purposes of this submission. If the existing drainage for the property is disrupted and there is no space for an alternative solution, the risk of flooding will increase.
- 1.6. The drainage statement also indicates that alongside infiltration to side a restricted discharge to an existing surface water sewer will be used. A surface water sewer can be found running in Glamis Street and Williams Street. Plans indicate an assumed incorrect position of the surface water sewer which is actually positioned in the footpath on the opposite side of the roads from the site, based upon the Public Sewer records. This will need to be verified by the applicant.
- 1.7. No evidence or permission has been provided to confirm whether discharge to the public drainage system is permitted, or whether the drain has sufficient hydraulic capacity. The applicant has not provided any further information on how they may drain the site if infiltration is later found to be unviable or the connection to the surface water sewer can be achieved. For this reason, we **object** to the proposal. The submission of such evidence may also affect the scale and layout of the development.
- 1.8. Subject to the viability of infiltration, it is likely that the proposal would require a hybrid solution, but as it currently stands, insufficient evidence has been provided to demonstrate that surface water falling on the site will not increase the risk of flooding, on site or elsewhere.

2. Interception drainage

- 2.1. Interception drainage is currently provided though permeable paving, water butts and a green roof. If, when evidence is presented, infiltration is found to be unviable, measures to include interception drainage will need to be added.

2.2. To accord with Standard 2 of the NSfS, evidence is required to demonstrate that at least the first 5mm of rainfall from the majority events falling onto positively drained surfaces, does not runoff from site into the piped drainage system. As this has not been demonstrated **we object** to the proposal on this basis.

2.3. Please note, consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development.

2.4. Where infiltration is not viable, there is a risk that interception drainage for the impermeable areas drained to the permeable paving may only be delivered by evapotranspiration. Additional interception features may need to be included within the proposed layout.

3. Extreme rainfall and flooding

3.1. 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** on this basis.

4. Water quality

4.1. Insufficient evidence has been provided to demonstrate water quality benefits, and therefore Standard 4 of the NSfS has not been met. As infiltration is proposed only in part (and its viability has not yet been confirmed) and as some areas of roof drainage appear to lack any treatment provision, further consideration of alternative measures to ensure adequate water quality management will be required.

4.2. The submission of this evidence may affect the scale or layout of the development. Therefore, **we object** to the proposal on these grounds.

5. Amenity

5.1. A green roof is proposed, which would provide amenity benefits consistent with Standard 5 of the Systems NSfS. While this information is noted, it is not expected to influence the overall scale or layout of the development. We therefore raise no objection on these grounds, subject to a condition requiring submission of detailed evidence of the proposed amenity benefits.

6. Biodiversity

6.1. A green roof is proposed, which would provide biodiversity benefits consistent with Standard 6 of the Systems NSfS. While this information is noted, it is not expected to influence the overall scale or layout of the development. We therefore raise no objection on these grounds, subject to a condition requiring submission of detailed evidence of the proposed 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

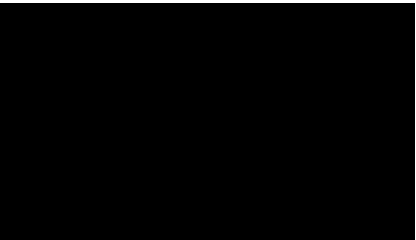
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

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

PL- Consultation- Engineers response



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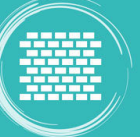
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From: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 08 April 2026 13:10
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Harry Chalk <Harry.Chalk@arun.gov.uk>
Cc: Paul Cann <Paul.Cann@arun.gov.uk>; Joe Dixon <Joe.Dixon@arun.gov.uk>
Subject: BR/5/26/PL

Hi,

Please find the engineers response attached; an objection.

Kind regards,

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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