

Planning Application Technical Response



Site:	57 Queensway, Bognor Regis
LPA Reference:	BR/67/25/PL
Date Assessed:	20 May 2025

FULL APPLICATION	Related Policy or Standard	Applicant Action Required	LLFA Specific Comment
All sources of flooding considered?	NPPF Paragraph 165, 173 PPG Paragraph 051 SDNSTS S10	Provide updated information within an amended FRA on;	
		<input type="checkbox"/> Fluvial flooding from the ordinary watercourse	
		<input checked="" type="checkbox"/> Surface water flow path originating offsite	Objection- please provide
		<input type="checkbox"/> Groundwater flooding	
		<input checked="" type="checkbox"/> Rainwater surcharged sewer flooding	Objection- please provide
		<input type="checkbox"/> Historic flood information	Objection- please provide. Southern Water Records checked?
Mitigation not appropriate	NPPF Paragraph 165, 173 and 180 PPG Paragraph 004, 023, 037, 041, 042, 043 and 044	<input type="checkbox"/> Use sequential approach with the following hierarchy. <ol style="list-style-type: none"> I. how can the development first avoid the risk of flooding II. how will it be mitigated (with evidence) III. how will flood resistance and resilience be employed 	N/A
		<input type="checkbox"/> The proposal increases the risk of flooding to existing infrastructure, dwellings, or property. Mitigation should be re-assessed to show how flood risk can be reduced overall.	N/A
		<input checked="" type="checkbox"/> Provide information on safe access and egress as part of an emergency plan. Temporary refuge is no longer acceptable.	Objection- please provide

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Long term sustainability of the development	NPPF Paragraph 173 and 180 PPG Paragraph 004, 036, 061, 068 and 069	<input type="checkbox"/> Provide site specific ordinary watercourse or surface water flow path modelling.	N/A
		<input checked="" type="checkbox"/> Demonstrate that any residual risk is managed with appropriate flood resistance and resilience measures.	Objection- please provide
		<input checked="" type="checkbox"/> Include evidence of appropriate freeboard to finished floor levels from the design flood level.	Objection- please provide
		<input checked="" type="checkbox"/> Include appropriate climate change allowance for assessment of the lifetime of the development (including the 3.33% AEP design flood event).	Objection- please provide
		<input checked="" type="checkbox"/> Use up to date FEH2022 rainfall data for all design flood events.	Objection- please provide
		<input type="checkbox"/> Provision of an easement of 3 m from the top bank of any watercourse is required for maintenance.	N/A
How does the site currently drain?	NPPF Paragraph 175 PPG Paragraph 059 SDNSTS S1, S2, S3, S4, S5, S6	<input checked="" type="checkbox"/> Evidence required on ground conditions / BRE365 or similar infiltration testing / dissolution potential / seasonally high groundwater levels.	Objection: BRE365 testing is required to confirm infiltration is unviable.
		<input type="checkbox"/> Greenfield runoff rates and volumes missing.	

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		<input type="checkbox"/> Greenfield runoff rates need to be recalculated (incorrect input parameters).	N/A
		<input checked="" type="checkbox"/> Pre-development brownfield runoff rates missing.	Objection: Brownfield rates have not been provided.
		<input type="checkbox"/> Pre-development brownfield runoff rates need to be recalculated (incorrect input parameters).	N/A
		<input checked="" type="checkbox"/> Drawing required to show where existing drainage network and outfall/s are, plus confirmation if will they be retained or removed.	Objection- please provide
		<input checked="" type="checkbox"/> Drainage survey required to provide evidence of existing discharge rate and condition (may include detailed asset or CCTV survey).	Objection- please provide
Where will the site drain to?	NPPF Paragraph 175 PPG Paragraph 055, 056, 059, 060, 061, 062 and 063 SDNSTS S12, 13 and S14	Drainage location hierarchy has not been followed, further information is required on; <input checked="" type="checkbox"/> evidence why rainwater reuse can't be included	Objection: The LLFA require the applicant to submit information on why rainwater cannot be reused.
		<input checked="" type="checkbox"/> interception has not been calculated and /or provided	Objection: The LLFA require the applicant to submit information on interception.
		<input type="checkbox"/> Infiltration proposals – re Groundwater Source Protection Zone I restrictions	N/A
		<input type="checkbox"/> Surface watercourse – does it connect to the wider network and is there permission and agreed access locations for proposed outfalls?	N/A
		<input checked="" type="checkbox"/> Surface water sewer – no in principle agreement from owner of the asset	Objection- please provide.

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		<input checked="" type="checkbox"/> Combined sewer – no in principle agreement from owner of the asset	Objection- please provide
		<input type="checkbox"/> In principle objection - proposing to connect surface water runoff to foul sewer	
		<input type="checkbox"/> Detailed justification required why the application cannot be drained via gravity and a pump is required	N/A
		<input type="checkbox"/> Full impact assessment of failure and emergency procedures required if a pump is part of the design	N/A
		<input type="checkbox"/> Justification is required as to why a deep bore infiltration feature has been proposed prior to shallow infiltration or connection to a surface watercourse.	N/A
Are the 4 pillars of SuDS provided and are they multifunctional?	NPPF Paragraph 175 PPG Paragraph 036, 055, 056, 059, 060, 061, 062 and 063	<input checked="" type="checkbox"/> Overarching proposals of how application must provide water quantity benefits in open, at the surface or above ground SuDS.	Objection: No open, at surface or above ground SuDS are proposed.
		<input checked="" type="checkbox"/> Commitment to the use of SuDS and high-level assessment to include: <ul style="list-style-type: none"> <input type="checkbox"/> water quality <input checked="" type="checkbox"/> biodiversity <input checked="" type="checkbox"/> amenity 	Objection: Please provide information on biodiversity and amenity.
How will the site drain without adversely effecting flood risk elsewhere?	NPPF Paragraph 173, 175 SDNSTS S2, S3, S4, S5, S6	<input checked="" type="checkbox"/> The most precautionary infiltration rate should be used in the design of the attenuation feature.	Objection: Infiltration testing has not been undertaken.
		<input type="checkbox"/> Infiltration rates are shown to be favourable and should be used in the drainage design (where appropriate).	N/A

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		<input type="checkbox"/> Infiltration storage drainage design should be recalculated to either only discharge through the sides of the structure or apply the appropriate factor of safety.	N/A
		<input type="checkbox"/> Infiltration drainage storage has half drain down time greater than 24 hours and an alternative design or mitigation is required.	N/A
		<input type="checkbox"/> The post development 100% AEP (or 1 in 1 year) rainfall event runoff rate should also be controlled to the equivalent pre-development rate.	N/A
		<input type="checkbox"/> Proposed discharge rates and volumes are greater than greenfield with no justification	N/A
		<input type="checkbox"/> Proposed discharge rates include future allowances for climate change and / or urban creep. These must be removed, and all calculations resubmitted.	N/A
		<input checked="" type="checkbox"/> Require justification and supporting calculations for brownfield % betterment and why this can't be closer to the predevelopment greenfield scenario.	Objection- please provide
		<input type="checkbox"/> Proposed discharge rates would increase flood risk elsewhere and need to be re-assessed.	N/A
		<input type="checkbox"/> A minimum runoff rate of 1 to 2 l/s/ha should be applied in groundwater dominated areas.	N/A

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		<input type="checkbox"/> How will the development not increase the volume of runoff as only pre and post calculations of greenfield runoff rate have been provided?	N/A
		<input type="checkbox"/> A complex control for runoff rate with long term storage provided, is required, if the drainage proposal is not limiting runoff to QBAR or 2 l/s/ha.	N/A
		<input checked="" type="checkbox"/> Include appropriate climate change allowance for the lifetime of the development (including 3.33% AEP design) for storage volumes.	Objection: The LLFA require the applicant to submit calculations for the 3.33% AEP which also includes climate change allowance.
		<input checked="" type="checkbox"/> Calculations should be resubmitted and demonstrate how 10% urban creep has been included in the volume of SuDS storage required.	Objection: The LLFA require the applicant to submit calculations for the 3.33% AEP.
		<input checked="" type="checkbox"/> Use up to date FEH2022 rainfall parameters in any modelling scenarios.	Objection- please provide
Location of SuDS		<input checked="" type="checkbox"/> Masterplan drawings need to show the high-level location of all SuDS and demonstrate that the volume of storage can be achieved in the layout.	Objection- please provide
How will the drainage and watercourse features be managed and maintained?	NPPF Paragraph 175 PPG Paragraph 055, 057 and 058 SDNSTS S10, S11, S12, S13 and S14	<input checked="" type="checkbox"/> Details of required maintenance of any SuDS features and structures and who will be adopting these features for the lifetime of the development.	Objection- please provide
		<input type="checkbox"/> Appropriate easements (to the adopting authority standard) to SuDS features should be shown on a drawing, this will be a minimum of 3m.	N/A
		<input type="checkbox"/> Indicative vehicular access route and off-road parking needs to be provided to ponds, basins and swales within the masterplan.	N/A

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		<input type="checkbox"/> Provide an easement of a minimum of 3 m from the top bank of any watercourse is required for maintenance of the watercourse. This should be on both banks, but justification should be provided if access is proposed from only one side of the bank or less than 3m (e.g. 2.5 times the width of any plant likely to be used (from the top of bank with maintenance plant parallel to the watercourse)).	N/A
		<input type="checkbox"/> Due to the likely long duration build out time (including phased development proposals), a construction management plan and supporting calculations and drawings are required to show a timeline of how temporary measures will be put in place to protect the water environment and any newly built SuDS features. This will include any temporary water quality and flow control devices	N/A
		<input type="checkbox"/> A high-level assessment of how water quantity and water quality will be managed during the construction phase is required. Identifying high level assumptions such as the need to discharge to a sewer or watercourse with appropriate pollution measures.	N/A
Other		<input type="checkbox"/> Bespoke advice	N/A

[REDACTED]

WSSC LLFA Surface Water Drainage response (part 2)







[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: [REDACTED]
Sent: 20 May 2025 14:32
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: LLFA Response To Application Number BR/67/25/PL 57 Queens Way Bognor Regis Email 2 of 2

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LLFA Response To Application Number BR/67/25/PL 57 Queens Way Bognor Regis Email 2 of 2

Email:

Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to

██ but the responding officer can be contacted directly via email if there are any questions relating to this response.

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