

## Engineers Comments Regarding Surface Water Drainage

|                                 |  |                            |             |
|---------------------------------|--|----------------------------|-------------|
| <b>Application Reference:</b>   | <b>BR/67/25/PL</b>   | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Amber Willard  | <b>Date of Review:</b>     | 26/11/2025  |
| <b>Site Name:</b>               | 57 Queensway Bognor Regis PO21 1QN   |                            |             |
| <b>Application Description:</b> | 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. This application is in CIL Zone 4 (Zero Rated) as flats. |                            |             |
| <b>Assessment Number:</b>       | 2  |                            |             |

| Policy and Guidance Information   |
|---|
| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |

| Response | Objection |
|----------|-----------|
|          |           |

| References  |
|---|
| <p>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.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p> |

## 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 | <b>Objection</b>                          |
| 2. Interception drainage  | Insufficient | <b>Objection</b>                          |
| 3. Extreme Rainfall and Flooding  | Insufficient | <b>Objection</b>                          |
| 4. Water Quality  | Compliant    | <b>No objection subject to conditions</b> |
| 5. Amenity  | Insufficient | <b>Objection</b>                          |
| 6. Biodiversity   | Insufficient | <b>Objection</b>                          |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient | <b>Objection</b>                          |

## Reviewed Plans

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

- Drainage Strategy Ref:560- Rev.V1
- Flood Risk Assessment Ref:U0560 FRA - v1
- PHASE 1 AND 2 GEOENVIRONMENTAL AND GEOTECHNICAL ASSESSMENT YEX2909
- REMEDIATION STRATEGY AND VERIFICATION PLAN

## Consultation comments to the planning officer

### 0. General

- 0.1. This is a major residential development for 18 dwellings that will affect drainage on and around the site and therefore sustainable drainage is required to meet minimum operational standards.
- 0.2. We previously reviewed this application on 19 August 2025 and gave an Objection response with comments on various aspects of the design and assessment of the drainage system.
- 0.3. We note the County Lead Local Flood Authority has issued a letter confirming no objection subject to planning conditions. However, we have outstanding comments to be addressed, set out below.
- 0.4. There appear to be some elements of proposed drainage infrastructure positioned outside of the planning red line boundary. It is unclear if this is within land ownership, or with the highway, or third

party land as the proposed layouts are not based upon topographic survey. These issues should be clarified in the submission.

1. Runoff destination

- 1.1. Rainwater harvesting in the form of large water butts for each property is provided in the design. We agree that this is proportionate to the scale of development.
- 1.2. The groundwater monitoring provided shows groundwater levels at 1.07m bgl in November 2022. This is unlikely to be the highest potential groundwater level due to the time of year. On this basis, infiltration features are not able to meet design standards and are not viable in this location.
- 1.3. The proposal to discharge to the public surface water sewer beneath Queensway is acceptable in principle subject to confirmation of capacity.
- 1.4. The destination of the existing surface water drainage should be confirmed to be the same existing surface water sewer, or confirmation from Southern Water obtained that there is additional spare capacity for the proposed development peak flows.
- 1.5. Note also the current construction details appear to show infiltration from the base of the permeable paving. This would not meet a requirement to retain 1m vertical distance from the base of the infiltration feature to groundwater.
- 1.6. The runoff destination is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. It is not feasible to discharge surface water to ground and therefore options for interception drainage are limited at this site. The proposals include rainwater butts, however, this would not provide interception drainage as they are typically full upon commencement of a winter storm.
- 2.2. 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.
- 2.3. 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 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.

3. Extreme rainfall and flooding

- 3.1. The site is brownfield land and the drainage strategy is to restrict peak runoff to a percentage of the previous unrestricted flow rate. This approach is not supported by the NSfS and the development should seek to achieve greenfield runoff rates where feasible to do so. A relaxation factor can potentially be agreed in accordance with the NSfS (para 3.21). However, the development may be able to achieve rates of between 0.5 - 1.0 litres per second depending on the design solution. The design should then incorporate measures to reduce the risk of blockage of the flow control device.
- 3.2. There are areas marked as permeable self-draining which are not acceptable and need to be included in the calculations as impermeable drained area. The drained areas should be confirmed on this basis.
- 3.3. The drainage design layout does not currently include sufficient proposed levels information to demonstrate the design is feasible. Outline finished levels including FFLs and key external paved surface levels should be provided together with CL, IL, base of storage and any relevant top of storage levels.

- 3.4. Greenfield runoff rates and drainage calculations should be confirmed using the latest FEH point data available for the location, data file to be provided confidentially to [land.drainage@arun.gov.uk](mailto:land.drainage@arun.gov.uk). The greenfield runoff rates should be applied pro rata to the impermeable drained area.
  - 3.5. A drained areas plan and summary which sets out totals including allowances for urban creep should be provided.
  - 3.6. The calculations will need to be updated and this is likely to affect the design peak flow rate and attenuation storage volumes.
  - 3.7. Our previous comments included a requirement for a surcharged outfall to be modelled. This does not appear to have been addressed in the current submission.
  - 3.8. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.
  - 3.9. Note there is a possibility of this application representing overdevelopment of the site where sustainable drainage policy requirements cannot be met within the plan area available.
4. Water quality
    - 4.1. The permeable paving provided in the design, together with catchpits for silt removal provide sufficient water quality mitigation for the development for discharge to a surface water sewer subject to technical design.
    - 4.2. Condition wording can be provided once the remaining aspects of the design are resolved.
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.
    - 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. If there is no feasible opportunity, a departure from the NSfS should be requested.
    - 5.4. Amenity is not currently in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.
6. Biodiversity
    - 6.1. No mitigation or specific design is proposed for biodiversity and no assessment is provided on the biodiversity aspect for the sustainable drainage system.
    - 6.2. 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.
    - 6.3. If there is no feasible opportunity, a departure from the NSfS should be requested.
    - 6.4. Water quality mitigation is not currently in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.
    - 6.5. Note there appear to be proposed trees positioned above the proposed attenuation storage. Advice should be sought to confirm that these trees are viable in the space and substrate constraints and that the trees would not damage the infrastructure in the long term.
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.

7.3. A detailed Management and Maintenance Plan can then 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

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

To register to receive notification of planning applications in your area please go to  
<https://www1.arun.gov.uk/planning-application-finder>



**Our priorities...**

|                                     |  |  |  |      |
|-------------------------------------|--|--|--|------|
| <br>Improving the wellbeing of Arun | <br>Delivering the right homes in the right places | <br>Supporting our environment to support us | <br>Fulfilling Arun's economic potential | <br> |
|-------------------------------------|--|--|--|------|

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**From:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>  
**Sent:** 26 November 2025 13:03  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Amber Willard <Amber.Willard@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: BR/67/25/PL

Hi Amber,

Find the consultation – an objection – attached. Apologies for the delay in response.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

Kind regards

**Sarah Burrow**  
**Flood Risk and Drainage Engineer, Coastal Engineers and Flood Prevention**






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**Our priorities...**

|   |  |  |   |   |
|---|--|--|---|---|
| <br>Improving the wellbeing of Arun | <br>Delivering the right homes in the right places | <br>Supporting our environment to support us | <br>Fulfilling Arun's economic potential | <br> |
|---|--|--|---|---|

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 10 September 2025 09:49  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: BR/67/25/PL

To: **Engineers (Drainage)**

**NOTIFICATION FROM ARUN DISTRICT COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990**

**Application No:** BR/67/25/PL  
**Registered:** 7th May 2025  
**Site Address:** 57 Queensway Bognor Regis PO21 1QN  
**Grid Reference:** 493424 99205  
**Category:** Plan Applicat'n  
**Description of Works:** 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. This application is in CIL Zone 4 (Zero Rated) as flats.

I am able to inform you that I have received an amendment to the above application dated 10th September 2025 relating to:- PHASE 1 AND 2 GEOTECHNICAL ASSESSMENT

If you should wish to make further representations as a result of this amendment, please make any further comment by **9th October 2025**.

[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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Email: [amber.willard@arun.gov.uk](mailto:amber.willard@arun.gov.uk)

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