

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/6/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Amber Willard	Date of Review:	20/02/2026
Site Name:	67, 69 and 71 Upper Bognor Road Bognor Regis PO21 1HR		
Application Description:	Retention of alterations to 3 No listed buildings, extension of a listed building to create an office and warden's accommodation, erection of 1 No new building consisting of 3 No flats, offices and workshops, creation of new private gardens, separation of this part of the site from the wider University campus, creation of a shared landscaped courtyard, areas for parking, and storage for bins and cycles. This application of listed buildings, affects the character and appearance of the Upper Bognor Road and Mead Lane Conservation Area and 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection
5. Amenity	Insufficient	No objection (relaxation)
6. Biodiversity	Insufficient	No objection (relaxation)
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- PROPOSED SITE LAYOUT 1127/BR/
- 70-71a EXISTING FLOOR PLANS 1127/BR/400 REVA
- LOCATION PLAN, SITE LAYOUT BLOCK PLAN 1127/417
- 70-71a EXISTING ELEVATIONS 1127/BR/401
- 67-69 EXISTING FLOOR PLANS AND ELEVATIONS 1127/E/300
- PROPOSED SITE LAYOUT 1127/P/101 REVA
- 65-71 PROPOSED FLOOR PLANS AND ELEVATIONS, MATERIALS, BIRD AND BAT BOXES
- PROPOSED TYPICAL WINDOW SECTIONS AND DETAILS 1127/P/201 REVC
- 67-69 PROPOSED FLOOR PLANS, ELEVATIONS 1127/P/301 REVB
- 71-71a PROPOSED FLOOR PLANS AND ELEVATIONS 1127/P/500
- DRAINAGE LAYOUT SHEET 1 OF 2 P1847-BAK-XX-XX-DR-C-501 REVP05
- DRAINAGE LAYOUT SHEET 2 OF 2 P1847-BAK-XX-XX-DR-C-502 REVP03
- EXCEEDANCE ROUTE PLAN P1847-BAK-XX-XX-DR-C-511 REVP02
- DETAILS P1847-BAK-XX-XX-DR-C-505 REVP02
- HARD PAVED AREAS DIAGRAM P1847-BAK-XX-XX-DR-C-510 REVP03
- FRA

- MICRODRAINAGE CALCULATIONS
- MICRODRAINAGE CALCULATIONS
- MICRODRAINAGE CALCULATIONS
- MICRODRAINAGE CALCULATIONS
- POLYSTORM UPLIFT/BOUYANCY CHECK
- DRAINAGE SYSTEM MAINTENANCE REQUIREMENTS
- SOIL INFILTRATION TEST PROCEDURE
- WATER QUALITY ASSESSMENT

Consultation comments to the planning officer

0. General

- 0.1. This is a previously consented scheme which was constructed without the drainage condition being discharged. The original planning consent was granted in March 2020 (BR/351/19/PL).
- 0.2. The original planning consent included Condition 5 which required full details of the proposed surface water drainage scheme and that Winter groundwater monitoring to establish highest annual ground water levels and winter percolation testing to BRE 365, or similar approved, will be required to support the design of any infiltration drainage.
- 0.3. The original planning consent included Condition 6 which required full details for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site.
- 0.4. The original planning consent included Condition 7 which required full details of the maintenance and management of the surface water drainage system.
- 0.5. The submitted designs are reviewed on the basis that approval of this application would require no further approvals for technical design and implementation of the surface water drainage system and would have discharged the conditions listed above.
- 0.6. The design standards for sustainable drainage at the time of the previous planning consent have been superseded by the National Standards for Sustainable Drainage but most of the local requirements were already in existence at that time.

1. Runoff destination

- 1.1. We are satisfied that there is no significant demand for non-potable water at the development and therefore rainwater harvesting is not required.
- 1.2. The drainage design shows permeable paving and soakaways discharging to ground. Infiltration testing is provided but the locations are not clear and there are insufficient tests relative to the number of soakaway locations.
- 1.3. There is no winter groundwater monitoring provided. There is a floatation calculation which indicates a groundwater level of 0.9m bgl which is above the level of the base of the soakaways. Ground Investigation including winter ground water monitoring should be provided to demonstrate high ground water would not rise within 1m vertical distance of the infiltration devices.
- 1.4. Without adequate ground investigation to evidence the proposed disposal of surface water to ground, we cannot support a design based upon infiltration.
- 1.5. 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. The current design meets the interception drainage requirements through infiltration. However, this aspects should be revisited if the design alters.

3. Extreme rainfall and flooding

- 3.1. There is no objection to the development on flood risk grounds. The risk from surface water is acceptable and the location within Flood Zone 3 and risk from tidal flooding is established by the consented application.
- 3.2. The design and calculations for extreme rainfall will need to be reviewed if the runoff destination changes, see comments above.
- 3.3. The paved areas plan should show drained areas in square metres to be able to audit against the drainage calculations. No Urban Creep is required.
- 3.4. The drainage layout plan should show the locations, depths and results of the infiltration testing and any information on groundwater monitoring.
- 3.5. The extent of the permeable paved car park conflicts with the Root Protection Zones.
- 3.6. The calculations include permeable paving which attenuates design storm runoff. Detailed finished levels design is required to assess the gradients and depths of the stone layer to ensure correlation with the calculations.
- 3.7. The Factors of Safety applied to the infiltration devices should be checked against the requirements of the NSfS (previously included in the SuDS Manual) and the design FoS clarified.
- 3.8. Further information is required to evidence the design is satisfactory, therefore, we **object** to the application.

4. Water quality

- 4.1. Water quality measures are acceptable.

5. Amenity

- 5.1. Due to the previous planning application being consented prior to the release of the National Standards for Sustainable Drainage, this criteria is not required to be met for this application and a relaxation / departure from Standard 5 is acceptable.

6. Biodiversity

- 6.1. Due to the previous planning application being consented prior to the release of the National Standards for Sustainable Drainage, this criteria is not required to be met for this application and a relaxation / departure from Standard 6 is acceptable.

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

- 7.1. The technical designs and construction details are generally acceptable in terms of specification and structural integrity.
- 7.2. Construction - Since the works are installed the designer should confirm that any alterations during construction meet the intended performance and do not reduce the ability of the drainage system to function as intended. Please provide evidence of the size of soakaways installed, the filter chambers and the depth of stone layer in the car park.
- 7.3. Maintenance – The MMP should be a standalone document which includes plans highlighting the key elements of the system and a proforma for inspection and maintenance task. Guidance is available on Arun DC webpages here - [suds-maintenance-checklist-oct-2025docx.docx](#)
- 7.4. As these aspects are for technical design / implementation stage and cannot be approved conditionally, we **object** to the application.

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. 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: 23 February 2026 17:36
To: Planning Scanning
Subject: FW: Planning Consultation on: BR/6/26/PL
Attachments: BR-6-26-PL - 67, 69 and 71 Upper Bognor Road 1 FEL v1.docx

PL- Consultation- Engineers response

Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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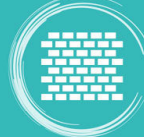
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Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 23 February 2026 13:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/6/26/PL

Please find enclosed our consultants response, an objection....

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
E: paul.cann@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



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Delivering the right homes in the right places



Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 23 January 2026 08:34
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BR/6/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Planning Permission

Application No:	BR/6/26/PL
Registered:	22nd January 2026
Site Address:	67, 69 and 71 Upper Bognor Road Bognor Regis PO21 1HR
Grid Reference:	494352 99537
Description of Works:	Retention of alterations to 3 No listed buildings, extension of a listed building to create an office and warden's accommodation, erection of 1 No new building consisting of 3 No flats, offices and workshops, creation of new private gardens, separation of this part of the site from the wider University campus, creation of a shared landscaped courtyard, areas for parking, and storage for bins and cycles. This application of listed buildings, affects the character and appearance of the Upper Bognor Road and Mead Lane Conservation Area and is in CIL Zone 4 (Zero Rated) as flats.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 26th February 2026 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Amber Willard

Planning Officer- Arun District Council

Telephone: 01903 737942

Email: amber.willard@arun.gov.uk