

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/82/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Amber Willard	Date of Review:	16/07/2026
Site Name:	63 Annandale Avenue Bognor Regis PO21 2ET		
Application Description:	Demolition of the existing dwellinghouse and associated buildings, and the construction of a three-storey building comprising 9 No. self-contained flats with associated landscaping, refuse storage, bicycle storage and parking spaces. This application is in CIL Zone 4 (Zero Rated) as other development.		
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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No Objection
5. Amenity	Insufficient	No Objection
6. Biodiversity	Insufficient	No Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection subject to condition

Reviewed Plans

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

- PROPOSED SW DRAINAGE STRATEGY 101 REVP-
- PROPOSED CONTRIBUTING AREA AND EXCEEDANCE FLOWS 201 REVP-
- PROPOSED TYPICAL CONSTRUCTION DETAILS 501 REVP-
- FOUL DRAINAGE
- EXISTING LOCATION AND SITE PLAN ANN_PL_001 REVD
- SuDS AND DRAINAGE REPORT
- SuDS AND MAINTENANCE SCHEDULE
- CAUSEWAY CALCULATIONS
- CAUSEWAY CALCULATIONS
- FRA
- GENERAL CCTV CONDITION CHECK
- CCTV SURVEY REPORTS
- DRAINAGE REPORT

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. The development is non major but affects drainage on and around the site and therefore sustainable drainage proportionate to the nature and scale of development is required by Paragraph 182 of the NPPF.
- 0.2. The site is not at significant risk of flooding from external sources as indicated by the submitted Flood Risk Statement and our datasets.

1. Runoff destination

- 1.1. The proposals include a communal below ground rainwater harvesting tank of 1,500 litres which is used for landscape irrigation and is acceptable.
- 1.2. Disposal of rainwater is to ground via infiltration. This is based upon an assumed rate of infiltration and is not supported by infiltration testing or groundwater monitoring.
- 1.3. Ground Investigation is not provided and therefore does not meet the standards set out in the ADC ground investigation checklist requirements. Guidance is provided on ADC webpages here: <https://www.arun.gov.uk/designer-checklists>
- 1.4. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 1). Therefore, we **object** to the application.

2. Interception drainage

- 2.1. The current design proposal achieves interception drainage through infiltration to ground. However, further information is required to evidence that this solution is feasible and further measures for interception drainage may be required if infiltration is not feasible, which may affect the plan layout.

3. Extreme rainfall and flooding

- 3.1. Calculations are provided for the design storm and supported by a drained areas plan. The calculations indicate no flooding and the parameters are acceptable.
- 3.2. However, the infiltration coefficients are based upon assumed infiltration rates and should be based upon sites specific values obtained through infiltration testing at similar depth and location to the proposed soakaway. See comments above on Runoff Destination.
- 3.3. The drained areas do not match the calculations. The drained areas plan shows 265 sqm or 0.027 ha whereas the calculations show 0.024 ha. This may be due to rounding but the calculations should be robust and it is not clear from the numbers that urban creep has been incorporated. The drained area into PP1 is shows as 20 sqm in the calculations and 40 sqm on the drained areas plan. The calculations and plan should be clarified and revised as necessary.
- 3.4. Calculations are not provided for the patio areas – PP2.
- 3.5. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3). Therefore, we **object** to the application.

4. Water quality

- 4.1. The mitigation provided by the permeable paving and bioretention planters is sufficient to mitigate the risk of pollution from the development.

5. Amenity

- 5.1. No specific design or assessment is submitted for amenity / multifunctionality and no assessment is provided on the amenity aspect for the sustainable drainage system.
- 5.2. However, due to the small scale of the development and use of the site, significant amenity value delivered through the sustainable drainage system is not feasible and a Relaxation to Standard 5 is allowable.
- 5.3. The bioretention units provide a small contribution to amenity value and we do not object on the grounds of inadequate amenity delivered through a multifunctional sustainable drainage solution.

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. However, due to the small scale of the development and use of the site, biodiversity value delivered through the sustainable drainage system is not required and Relaxation to Standard 6 is allowable.
- 6.3. The bioretention units provide a small contribution to biodiversity and we do not object on biodiversity grounds.

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

- 7.1. An outline Management and Maintenance Plan is provided with the planning application which is acceptable for the current design for planning stage. A condition can be applied to require a detailed Management and Maintenance Plan.

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



Arun District Council, Civic Centre, Maltravers Rd
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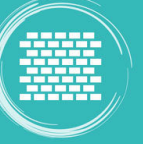
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Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 July 2026 14:36
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/82/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Supporting our environment to support us



Fulfilling Arun's economic potential



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 25 June 2026 11:33
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BR/82/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No:	BR/82/26/PL
Registered:	25th June 2026
Site Address:	63 Annandale Avenue Bognor Regis PO21 2ET
Grid Reference:	493427 99854
Description of Works:	Demolition of the existing dwellinghouse and associated buildings, and the construction of a three-storey building comprising 9 No self-contained flats with associated landscaping, refuse storage, bicycle storage and parking spaces. This application is in CIL Zone 4 (Zero Rated) as other development.

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 30th July 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

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