

Engineers Comments Regarding Surface Water Drainage

Application Reference:	FP/66/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Simon Davis	Date of Review:	25/06/2026
Site Name:	Rabbit Island Rear of 84 Brooks Lane Bognor Regis PO22 8DN		
Application Description:	Retention of an existing agricultural barn previously approved under FP/106/23/AG with a total roof height of 4.2m (compared to 2.9m as permitted). This application is in CIL Zone 5 (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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	No objection
5. Amenity	Insufficient	No objection
6. Biodiversity	Insufficient	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection

Reviewed Plans

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

- FRS Water and Access
- PLANNING STATEMENT INCLUDING FRA AND DRAINAGE
- LOCATION PLAN
- BLOCK PLAN

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 existing farm building would have benefitted from permitted development but the roof height requires retrospective full planning consent. The application is therefore assessed as a full planning application.
- 0.2. The development affects drainage on and around the site and therefore in accordance with NPPF paragraph 182 a SuDS Approach is required. The development is non-major and the measures should be proportionate to the nature and scale of development.
- 0.3. The existing track is permitted development and planning consent is not sought for this aspect. The track does not require sustainable drainage.

1. Runoff destination

- 1.1. No drainage strategy is submitted with the planning application. The proposed runoff destination is not known.
- 1.2. Rainwater reuse for irrigation is likely to be feasible at this site.
- 1.3. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

2. Interception drainage

- 2.1. No strategy of calculations are provided for interception drainage.
- 2.2. Interception drainage is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. No calculations are provided for the drainage system.
- 3.2. Guidance is provided on ADC webpages - <https://www.arun.gov.uk/surfacewater>.
- 3.3. Management of extreme rainfall is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

4. Water quality

- 4.1. No assessment for water quality is provided with the application and water quality mitigation is not currently incorporated into the design.
- 4.2. However, there are no trafficked areas within the application and measures to mitigate runoff from the roof area (sediment and solids removal) are able to be integrated to the drainage design.

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. However, due to the small scale of the development and use of the site, amenity value delivered through the sustainable drainage system is not required and an Exception to Standard 5 is allowable.

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 an Exception to Standard 6 is allowable.

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

7.1. A maintenance plan for the drainage system has not been submitted but the site is within a single ownership and management and this aspect can be addressed as part of the technical 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



From: Daun Johnson on behalf of Planning.Responses
Sent: 25 June 2026 13:07
To: Planning Scanning
Subject: FW: Planning Consultation on: FP/66/26/PL
Attachments: FP-66-26-PL - Rabbit Island Rear of 84 Brooks Lane 1 v2.docx

Please upload attachment to FP/66/26/PL, planning, consultee response, END

Daun Johnson
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Planning Services



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



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 25 June 2026 12:27
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: Planning Consultation on: FP/66/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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E: paul.cann@arun.gov.uk

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Improving the wellbeing of Arun

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: 10 June 2026 13:19
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: FP/66/26/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: FP/66/26/PL
Registered: 5th June 2026
Site Address: Rabbit Island Rear of 84 Brooks Lane Bognor Regis PO22 8DN
Grid Reference: 494433 100443

Category:	Plan Applicat'n
Description of Works:	Retention of an existing agricultural barn previously approved under FP/106/23/AG with a total roof height of 4.2m (compared to 2.9m as permitted). This application is in CIL Zone 5 (Zero Rated) as other development.

I am able to inform you that I have received an amendment to the above application dated relating to:-

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

[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

Mr S Davis

Planning Case Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLRECON (ODB) 2018