

From: Nicola Spencer on behalf of Planning.Responses
Sent: 12 December 2025 19:14
To: Planning Scanning
Subject: FW: Planning Consultation on: BR/194/25/DOC

PL- Consultation- Engineers response

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 12 December 2025 15:44
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Amber Willard <Amber.Willard@arun.gov.uk>; Land Drainage <Land.Drainage@arun.gov.uk>; Daniel Vick <Daniel.Vick@arun.gov.uk>; Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/194/25/DOC

Please find my consultation response below;

A similar surface water drainage scheme proposed under BR/102/25/DOC was determined to be unacceptable, and as a result the previous scheme was suitably revised to comply with ‘National Standards for SuDS’ (NSfS).

Since this current proposal replicates the original ‘unacceptable’ scheme, I have no option but to ‘**OBJECT**’.

The current proposal is to discharge (via pumping) surface water runoff from the football pitch into the foul sewer network.

The NSfS does not consider discharges of surface water to foul sewer networks as a recognised option, for good reason (ie. pollution and flood risk). This requirement is irrespective of whether the site discharges surface water to the foul sewer network currently. As there is a public surface water sewer network available in Nyewood Lane, it is unclear as to why the site currently drains surface water to the foul sewer. Nevertheless, for clarity extracts from the NSfS detailing the hierarchy for surface disposal options is below;

Runoff from the development shall be discharged to the following final destinations, to the maximum extent practicable, in accordance with the below hierarchy:

- priority 1: collected for non-potable use*
- priority 2: infiltrated to ground*
- priority 3: discharged to an above ground surface water body*
- priority 4: discharged to a surface water sewer, or another piped surface water drainage system*
- priority 5: discharged to a combined sewer*

Note 1: priority 1 is the highest priority and priority 5 is the lowest.

Note 2: for the purposes of this standard, a combined sewer is a sewer intended to receive both foul sewage and surface runoff and does not include a sewer intended to receive only foul sewage, even if it has the capacity to accommodate additional flows or has an element of surface water in it already.

To utilise a lesser priority final destination, appropriate evidence shall be provided that demonstrates all higher priority final destinations have been utilised to the maximum extent practicable. Higher cost alone shall not be a reason to utilise lower priority final destinations.

Clause 1.10 - Surface water runoff from the development shall not discharge to a foul drainage system.

The proposals also intend to pump surface water rather than gravitate, due to the fact that they are connecting to a shallow foul drain. Connecting to the surface water sewer network would eliminate the need for a pump. Pumping is unsustainable and is appropriately discussed in the NSfS as extracted below;

Clause 1.24 The use of pumping within surface water drainage systems shall be by exception only and agreed with the approving body due to the associated carbon, energy and maintenance implications, and the risks associated with failure and exceedance.

Clause 1.25 The need for pumping should be assessed against the use of a lower priority final destination which is achievable by gravity.

Clause 1.25.1 The assessment should consider the cost effectiveness of pumping and risk of pump failure, including mitigation against pollution and flooding.

Clause 1.26 Pumping shall only be utilised for any parts of the development that cannot be drained by gravity.

The use of the word 'shall' in the NSfS indicates a performance or method-based requirement of the standards which can only be varied through a departure agreed with the approving body.

Therefore, any departure from the NSfS would need to be agreed by the Local Planning Authority, but deviation in this case would not be supported by ourselves, on grounds of pollution/flood risk. This is irrespective of whether flows to the foul sewer network are being reduced, as there is an alternative suitable disposal option available, which is in accordance with the hierarchy (ie. Priority 4). This would involve connecting to the Public Surface Water Sewer in Nyewood Lane.

Regards

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: Friday, November 7, 2025 8:03:35 AM (UTC+00:00) Monrovia, Reykjavik
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: BR/194/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	BR/194/25/DOC
Registered:	6th November 2025
Site Address:	Bognor Regis Football Club Nyewood Lane Bognor Regis PO21 2TY
Description of Works:	Approval of details reserved by condition imposed under BR/236/24/PL relating to condition 4-surface water drainage scheme.

The Council have received the above application to discharge conditions. I shall be pleased to receive any observations you may wish to make in respect of those conditions relating to your field of expertise.

[Click here to view the Discharge of Condition application and view the 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.

[Click here to view the original application and decision notice](#)

Should you wish to make any comments click on the link and click into ?Enter Comment? or if this is not possible email your response to planning.responses@arun.gov.uk by **21st November 2025**.

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.

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

Yours sincerely

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PLCONDOC (ODB) 2020