

Engineers Comments Regarding Surface Water Drainage

Application Reference:	BR/198/25/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	29/12/2025
Site Name:	The Regis School Campus Westloats Lane Bognor Regis PO21 5LH		
Application Description:	Installation of a four-lane outdoor caged cricket net facility. This application is in CIL Zone 4 (Zero Rated) as other development.		
Assessment Number:	1		

Policy and Guidance Information
<p>Arun District Council Surface Water Drainage Guidance (including design checklists) - https://www.arun.gov.uk/surfacewater</p> <p>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/</p> <p>Arun District Council Land Drainage Byelaws - https://www.arun.gov.uk/byelaws/</p> <p>Arun District Council surface water pre-commencement conditions - https://www.arun.gov.uk/planning-pre-commencement-conditions</p> <p>The National Standards for SuDS - https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions

Reviewed Plans

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

-FRA AND DRAINAGE STRATEGY

-BLOCK PLAN, uploaded in 2 parts via the public planning portal

-3D PLAN

-LOCATION PLAN, uploaded in 2 parts via the public planning portal

-FLOOR PLAN AND ELEVATIONS EEL-828-3379

Consultation comments to the planning officer

0. General

0.1. This is non-major development within an existing brownfield school site which replaces grassy field with a sports surface.

0.2. Whilst the development is small, the works affect drainage within the site and potentially offsite and therefore NPPF Sustainable Drainage requirements apply.

1. Runoff destination

- 1.1. There is no proposal for collection and reuse of rainwater. This is acceptable on the basis of the small scale of development and there being no irrigation demand within the development site.
- 1.2. The proposed runoff destination is a soakaway. However, no infiltration testing or evidence to demonstrate the base of the soakaway would be minimum 1m above winter high groundwater levels has been provided to demonstrate the feasibility of the solution.
- 1.3. 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 proposed runoff destination does not require interception drainage but has not yet been demonstrated to be feasible.
- 2.2. Evidence has not been provided to justify the lack of interception drainage proposed 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.

3. Extreme rainfall and flooding

- 3.1. Calculations have not been provided to demonstrate the effectiveness of the proposed drainage system for large return period storms. The development may therefore increase runoff from the development.
- 3.2. There is an area of High and Medium surface water flood risk within the area of works which may affect the ability of the drainage system to effectively drain the paved area. This is not currently addressed in the submission.
- 3.3. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. Water quality mitigation is not covered within the Drainage Strategy. However, the risk from the proposed use is low or very low and the permeable surface would be sufficient to remove silt prior to discharge to the soakaway or other outlet.

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. Opportunities on a site such as this may be extremely limited.
- 5.3. If there is no feasible opportunity, a departure from the NSfS should be requested. No departure from the national standards from SuDS has been 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.

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

- 7.1. The Drainage Strategy does not include an outline maintenance and operation plan. However, the development proposals are within a single curtilage and the drainage system would be added to the preexisting maintenance responsibilities at the school.
- 7.2. A detailed Management and Maintenance Plan can 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

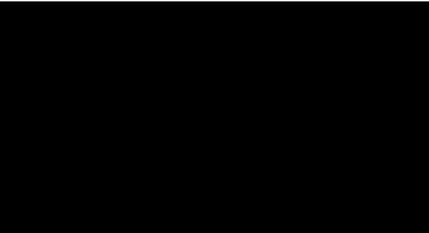
This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

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

PL- Consultation- Engineers Response



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

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<https://www1.arun.gov.uk/planning-application-finder>



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 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 January 2026 10:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/198/25/PL

Please find enclosed our consultants response, an objection.

Regards

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

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 01 December 2025 13:49

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: BR/198/25/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/198/25/PL

Registered: 1st December 2025

Site Address: The Regis School Campus Westloats Lane Bognor Regis PO21 5LH

Grid Reference: 492214 100035

Description of Works: Installation of a four-lane outdoor caged cricket net facility. 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 4th January 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

Hebe Smith

Planning Officer- Arun District Council

Telephone: 01903 737626

Email: hebe.smith@arun.gov.uk

PLCONSULT (ODB) 2020