

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/157/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	07/08/2026
Site Name:	Wick Football Club Crabtree Park Coomes Way Littlehampton BN17 7LS		
Application Description:	Change of surface from grass to artificial turf and erection of new 2.5m acoustic fencing. This application is in CIL Zone 2 (zero rated) as all 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further Information
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Further Information
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	Further Information

Reviewed Plans

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

- Edge Detail Plan Dwg no. 2230/04
- Drainage Plan
- Utility Survey Dwg no. RSP2563
- Proposed Site Layout Dwg no. 0001
- Management and Maintenance Plan
- Drainage strategy

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 site is over 1 hectare and therefore major development.
- 0.2. The change from grass pitch to artificial pitch affects drainage on the site and sustainable drainage is therefore required by NPPF paragraph 182.
- 0.3. It is important to demonstrate sustainable drainage for engineered pitch surfaces as they do not replicate natural greenfield runoff. There appear to be other elements to the development on the site layout plan which should be clarified and included in the sustainable drainage strategy as necessary. For example, reconstruction of the carpark should be included.

1. Runoff destination

- 1.1. There is likely to be an irrigation demand at the site and it would be applicable to consider reuse of rainwater for this development, this may be achieved by incorporating rainwater harvesting upstream of the point of discharge for water drained from the pitch.
- 1.2. The drainage strategy shows pitch drainage discharged to a soakaway, however, no groundwater monitoring or infiltration testing has been provided to demonstrate the feasibility of the infiltration solution.
- 1.3. The drainage strategy does not appear to include the alterations to hard paving and other development works to the west of the pitch.
- 1.4. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 1). The current submission does not demonstrate compliance with the standard, therefore, we **Object** to the development.

2. Interception drainage

- 2.1. The design currently provides interception drainage through infiltration. However, the infiltration solution has not been evidenced and may not be feasible and the drainage strategy does not appear to include all aspects of the development.
- 2.2. Further information to demonstrate interception drainage is provided by the design is required.

3. Extreme rainfall and flooding

- 3.1. No calculations are provided to demonstrate the drainage system can accommodate extreme rainfall without flooding.
- 3.2. Guidance is provided within the National Standards for Sustainable Drainage [NSfS] and on Arun District Council Webpages here: <https://www.arun.gov.uk/suds-general-design-guidance/>
- 3.3. A more comprehensive drainage strategy is required, including all aspects of development with the drained area clarified by a drained areas plan.
- 3.4. Further information is required to confirm the design is in accordance with the requirements of the NSfS (Standard 3). The current submission does not demonstrate compliance with the standard, therefore, we **Object** to the development.

4. Water quality

- 4.1. Water quality is acceptable for the pitch drainage. However, there may be paving with vehicular access which would require a higher standard of treatment.
- 4.2. Further information is required to demonstrate interception drainage is provided by the 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. If the development is solely for the pitch construction, 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.
- 5.3. If the development is wider and includes buildings and car parking, an assessment of amenity provided by multifunctional design should be provided within the drainage statement.
- 5.4. Further information is required to demonstrate amenity is provided by the design.

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. If the development is solely for the pitch construction, 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 5 is allowable.
- 6.3. If the development is wider and includes buildings and car parking, an assessment of biodiversity provided by multifunctional design should be provided with the drainage statement or within the ecology report.
- 6.4. Further information is required to demonstrate biodiversity is provided by the design.

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

- 7.1. There are no concerns about the construction and structural integrity of the current drainage strategy. This will need to be reviewed if the strategy changes.
- 7.2. The development would be under a single ownership and management responsibility. A general maintenance plan is submitted with the application and may need to be updated with further details of the drainage system and to comply with Arun DC guidance. A sustainable drainage Maintenance Plan can be the subject of a planning condition.

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

Arun District Council, Civic Centre, Maltravers Rd
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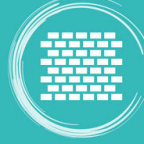
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Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 11 August 2026 09:18
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: LU/157/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 10 August 2026 12:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: LU/157/26/PL

To: **Engineers (Drainage)**

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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:	LU/157/26/PL
Registered:	21st July 2026
Site Address:	Wick Football Club Crabtree Park Coomes Way Littlehampton BN17 7LS
Grid Reference:	502959 103824
Description of Works:	Change of surface from grass to artificial turf and erection of new 2.5m acoustic fencing. This application is in CIL Zone 2 (zero rated) as all 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 1st September 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

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Email: hebe.smith@arun.gov.uk