

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/157/26/PL	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Hebe Smith	Date of Review:	22/09/2026
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:	2		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Further Information
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Further Information
5. Amenity	Insufficient	Further Information
6. Biodiversity	Insufficient	Further Information
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	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
- Flood Risk Assessment and Drainage Strategy**
- Site Investigations Report**
- Proposed 3G Pitch Construction Make-Up**
- Proposed Typical Details**

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 Policy F8.
- 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.
- 0.4. We have reviewed the Flood Risk Assessment and Drainage Statement together with the Site Investigation.
- 0.5. Since the previous consultation, a revised Site Plan has been submitted which shows a large new car park area within the planning redline boundary (as shown on the location and block plans). This drained area is not currently included in the assessment.

1. Runoff destination

- 1.1. We understand the pitch will be 3G (rubber crumb and synthetic grass) and therefore would not require irrigation.
- 1.2. Site investigation has been carried out in April 2026 and included infiltration testing at 1 metre below ground level (Clay subsoil), which returned no viable infiltration, and at 4.5 metres below ground level (Sand subsoil), which returned viable infiltration from a single fill. No groundwater monitoring has been undertaken.
- 1.3. The single test result at 4.5 metres below ground level is not sufficient to demonstrate infiltration potential as three tests in quick succession are required. Without groundwater monitoring it is not possible to demonstrate that an infiltration feature would remain at least 1 metres above high groundwater level. It is probable that groundwater would preclude infiltration features at this depth.
- 1.4. There may be subsoil which is viable for infiltration at around 1.5 - 2 metres below ground level which is not tested in the ground investigation. This would only be acceptable as solution if groundwater levels allow, which required winter groundwater monitoring in addition to infiltration testing. See Arun DC guidance on ground investigation for drainage purposes, here: <https://www.arun.gov.uk/infiltration-testing>
- 1.5. The drainage strategy does not appear to include the alterations to hard paving and other development works to the west of the pitch. This now includes a large area of car parking, which is within the red line boundary and should therefore be assessed.
- 1.6. The proposed discharge to the surface water sewer is acceptable if further ground investigation shows that infiltration to ground is not feasible, following the drainage priorities in Standard 1. Further ground investigation could be the subject of a planning condition on the basis of there being an alternative outlet via discharge to the sewer.

- 1.7. The feasibility of connection to the sewer should be confirmed through a capacity check with the asset owner and additional levels information provided on the drainage layout to confirm connection by gravity is feasible.
- 1.8. 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 pitch area would operate in the same way as a permeable pavement are therefore the self-drained area achieves interception drainage. Similarly the proposed use of permeable paving for the hard standings achieves the same.
- 2.2. Design and assessment of the carpark should be provided.
- 2.3. Further information to demonstrate interception drainage is provided by the design is required.

3. Extreme rainfall and flooding

- 3.1. The greenfield runoff and drained areas should be confirmed with reference to the revised Proposed Site Plan (SN25-0487 DWG SP 0001 .00). This may affect the design peak flow rate, which can be based upon 3 litres per second per hectare of drained area (if more than the calculated value).
- 3.2. The drainage layout should include all drained areas within the site boundary. The design should therefore include the proposed carpark to the west of the pitch.
- 3.3. The drainage layout should include sufficient finished ground and below ground drainage levels information to demonstrate feasibility subject to technical design.
- 3.4. The ability of the downstream sewer to accept the flows should be confirmed through capacity check.
- 3.5. Whilst it is noted the risk is low due to the use of permeable paving, the exceedance paths should be updated to include the carpark design and to demonstrate where exceedance flows leave the site without flowing towards the existing building.
- 3.6. 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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 02 October 2026 15:48
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
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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

Sent: 15 September 2026 12:00

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

Subject: Planning Consultation on: LU/157/26/PL

To: Engineers (Drainage)

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

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
Category: Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 10th September 2026 relating to:- Supplementary drainage docs and plans and response to SE comments

If you should wish to make further representations as a result of this amendment, please make any further comment by **7th October 2026**.

[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

Hebe Smith

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