

## Engineers Comments Regarding Surface Water Drainage

|                                 |                                                                                                                                                                                                     |                            |                    |
|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------|
| <b>Application Reference:</b>   | A/129/25/DOC                                                                                                                                                                                        | <b>Reviewer Reference:</b> | <b>ADC/EXT3/RW</b> |
| <b>Planning Officer:</b>        | Kathryn Welch                                                                                                                                                                                       | <b>Date of Review:</b>     | 28/11/2025         |
| <b>Site Name:</b>               | Rustington Golf Centre Golfers Lane Angmering BN16 4NB                                                                                                                                              |                            |                    |
| <b>Application Description:</b> | Approval of details reserved by condition following the grant of A/129/21/PL (appeal ref APP/C3810/W/22/3298192) relating to the partial discharge of condition 19 - surface water drainage scheme. |                            |                    |
| <b>Assessment Number:</b>       | 1 of 2                                                                                                                                                                                              |                            |                    |

| Policy and Guidance Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
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| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-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/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |  |

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|-----------------|-----------------------------------------------------------------|
| <b>Response</b> | Condition 19 (Partial discharge of condition): <b>Objection</b> |
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| References                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to [land.drainage@arun.gov.uk](mailto:land.drainage@arun.gov.uk) if needed.

| Standard                                                                          | Assessment   | Response         |
|-----------------------------------------------------------------------------------|--------------|------------------|
| 1. Runoff destination                                                             | Insufficient | <b>Objection</b> |
| 2. Interception drainage                                                          | Insufficient | <b>Objection</b> |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient | <b>Objection</b> |
| 4. Water Quality                                                                  | Insufficient | <b>Objection</b> |
| 5. Amenity                                                                        | Insufficient | <b>Objection</b> |
| 6. Biodiversity                                                                   | Insufficient | <b>Objection</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient | <b>Objection</b> |

## Reviewed Plans

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

- Engineering layout sheet 1 of 3 4001 A
- Construction makeup sheet 1 of 3 4004 A
- Highway construction details 4007 E
- Drainage Construction Details Sheet 1 of 2 4008 E
- Surface Water Manhole Schedules Sheet 2 4049 A
- Foul Rising Main Longsections 4051 A
- Phase 3 and 4 Catchment plan 4052 A
- Pumping Station Tanker Tracking 4054 A
- Road Geometry Phase 3 & 4 4055
- Drainage layout 4056
- Levels layout 4057
- Private Drainage Setting Out 4058
- Private Drainage Setting Out Co-ordinates 4059
- S104 Agreement Plan phase 3 & 4 4061
- Overland Flow Plan Phase 3 and 4 4062

- Infiltration testing February 2023 - part 3
- Infiltration testing february 2023 - part 1
- Winter groundwater monitoring
- Infiltration testing
- Supplementary groundwater monitoring
- Additional infiltration testing
- Supplementary groundwater monitoring
- Infiltration testing February 2023 - part 2

### Condition wording

Condition 19 (Partial discharge of condition) is worded as follows:

*“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.”*

### Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
- 2. High groundwater has not been addressed.**
- 3. Calculations not provided.**

### 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

|                                                                                                                        |                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <b>Application Reference: A/129/25/DOC</b><br><b>Site Name: Rustington Golf Centre Golfers Lane Angmering BN16 4NB</b> | <b>Initial Issue Date:</b><br><b>Issue Date: 28/11/25</b><br><b>Reviewer Reference: ADC/EXT3/RW</b> |
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### Summary and Recommendation:

Condition 19(Partial discharge to conditions): **Objection**

*Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.*

|                          | ADC Drainage Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Designer Response |  |  |  |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|--|--|--|
| <b>Date:</b>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |  |  |  |
| <b>Condition Number:</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |  |  |  |
| Comment Number           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                   |  |  |  |
| 1.                       | <p>Groundwater monitoring has been undertaken by RSK over the course of 3 separate investigation windows</p> <p>Supplementary monitoring: 3050199 L02 (00)<br/>May/21</p> <p>Supplementary monitoring 2: 3050199 L04 (01)<br/>Feb/22</p> <p>Winter monitoring: RSK ref: 305199 L08 (00)<br/>Nov/22</p> <p>It is noted this development discharges to the phase to the east which has had the infiltration system approved as part of a separate application.</p> <p>The infiltration basin for the western end of the development is located in the vicinity of WS01.</p> |                   |  |  |  |

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|    | <p>The highest groundwater level noted for WS01 as part of the groundwater monitoring is the level noted on 21/10/21 as part of the original groundwater monitoring. This level is 2.04m AOD.</p> <p>The proposed basin at the western end of the development sits circa 260mm above this water level.</p> <p>Can the applicant please show how the development mitigates the potential of the development on the groundwater including groundwater pollution from the infiltration features.</p> <p>Can the applicant please show how the high groundwater has been considered with regards to the effects on the drainage scheme for the development.</p> |  |  |  |  |
| 2. | <p>The infiltration tests provided are over 2 reports</p> <p>RSK report 305199L01 April/21<br/>And<br/>Geosciences ref 305199 L09 (01) Apr/23</p> <p>The infiltration tests for RSK report 305199L01 note that groundwater at 1.8m below ground level was encountered in TP06. A retest pit TP06B was dug to a depth of 1.40m and the test taken at a shallower depth.</p> <p>The report notes that “In TP06/06b, however at the lowest part of the site, groundwater was encountered at 1.80 m and therefore discharge is not possible at this location.”</p>                                                                                              |  |  |  |  |

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|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
|     | <p>The Geosciences report 305199 L09 (01) notes that:</p> <p>“TP501 was to be completed to a maximum depth of 3.50 m bgl for the purpose of infiltration testing for soakaway design. Groundwater was encountered at 2.00 m bgl, rising to 1.75 m bgl in 20 minutes”</p> <p>and</p> <p>“TP501 was to be completed to a maximum depth of 3.50 m bgl for the purpose of infiltration testing for soakaway design. Groundwater was encountered at 2.00 m bgl, rising to 1.75 m bgl in 20 minutes, and the north trial pit face collapsed in. Patrick Parsons was consulted, and the location was abandoned.”</p> <p>Can the applicant please advise which tests have been considered when judging the proposed infiltration rates for the development.</p> |  |  |  |  |
| 3.  | No calculations have been submitted for the western catchment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |
| 4.  | No calculations have been submitted for how the eastern catchment interacts with the neighbouring development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |  |  |  |
| 5.  | Has infiltration testing been undertaken at the depth of the proposed infiltration feature?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |  |  |
| 6.  | have shallow drainage features been fully utilised to minimise drainage construction depth?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |  |  |  |
| 7.  | Have water quality assessments been undertaken in line with the Ciria SuDS manual?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |  |  |
| 8.  | Has FEH data been utilised for the design?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |  |  |  |
| 9.  | Has a Cv value of 1 been utilised for the design?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |  |  |  |
| 10. | What climate change allowances have been utilised?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |  |  |

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| 11. | Have suitable urban creep allowances been made?                                                   |  |  |  |  |
| 12. | Have half drain time of 24 hours been met for the 3.33% AEP + CCA design?                         |  |  |  |  |
| 13. | Please provide catchment plan matching calculation set, including areas of urban creep allowance. |  |  |  |  |

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to [land.drainage@arun.gov.uk](mailto:land.drainage@arun.gov.uk).

PL- consultation – engineers response

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

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



### Our priorities...



Improving the  
wellbeing of Arun



Delivering the  
right homes in  
the right places



Supporting our  
environment  
to support us



Fulfilling Arun's  
economic potential



**From:** Sarah Burrow <Sarah.Burrow@arun.gov.uk>

**Sent:** 02 December 2025 15:35

**To:** Planning.Responses <Planning.Responses@arun.gov.uk>

**Cc:** Land Drainage <Land.Drainage@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>

**Subject:** RE: Planning Consultation on: A/129/25/DOC

Hi Kathryn,

Find the consultation – an objection – attached. Apologies for the delay in response.

I am submitting this consultation on behalf of Paul, our Principal Drainage Engineer. It has been completed by one of our external consultants.

Kind regards

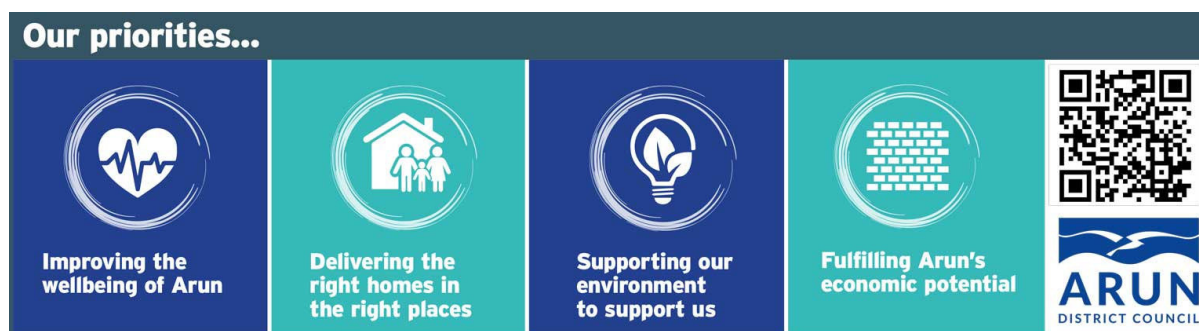
**Sarah Burrow**  
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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 29 August 2025 13:49

**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>

**Subject:** Planning Consultation on: A/129/25/DOC

To: **Engineers (Drainage)**

## NOTIFICATION FROM ARUN DISTRICT COUNCIL

### TOWN AND COUNTRY PLANNING ACT 1990

|                              |                                                                                                                                                                                                     |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Application No:</b>       | <b>A/129/25/DOC</b>                                                                                                                                                                                 |
| <b>Registered:</b>           | 28th August 2025                                                                                                                                                                                    |
| <b>Site Address:</b>         | Rustington Golf Centre Golfers Lane Angmering BN16 4NB                                                                                                                                              |
| <b>Description of Works:</b> | Approval of details reserved by condition following the grant of A/129/21/PL (appeal ref APP/C3810/W/22/3298192) relating to the partial discharge of condition 19 - 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](mailto:planning.responses@arun.gov.uk) by **12th September 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

Kathryn Welch

Planning Case Officer- Arun District Council

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Email: [kathryn.welch@arun.gov.uk](mailto:kathryn.welch@arun.gov.uk)