

Engineers Comments Regarding Surface Water Drainage

Application Reference:	A/177/25/DOC	Reviewer Reference:	ADC/EXT3/RW
Planning Officer:	Kathryn Welch	Date of Review:	26/02/2026
Site Name:	Rustington Golf Centre Golfers Lane Angmering BN16 4NB		
Application Description:	Approval of details reserved by condition imposed under A/163/24/PL relating to conditions 6-surface water drainage scheme and 7-maintenance and management of surface water drainage system.		
Assessment Number:	2 of 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	Condition 6: Support Condition 7: Support
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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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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 if needed.

Standard	Assessment	Response
1. Runoff destination	Compliant	Support
2. Interception drainage	Compliant	Support
3. Extreme Rainfall and Flooding	Compliant	Support
4. Water Quality	Compliant	Support
5. Amenity	Compliant	Support
6. Biodiversity	Compliant	Support
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	Support

Reviewed Plans

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

- EMAIL 11.2.26 additional letter
- CCTV
- Final report
- ADC Correspondance
- SUDS Maintenance Plan
- NSS compliance note
- Drainage Calculations
- Runoff calculations
- Drainage Construction details sheet 2 13361 1702 P2
- Drainage Construction Details 13361 1701 P3
- Drainage Strategy 13361 1101 P4

- RGC letter regarding Maintenance
- SuDS DRAINAGE STATEMENT

Condition wording

Condition 6 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. Design considerations must take full account of the 'Supplementary Requirements for Surface Water Drainage Proposals' produced by Arun District Council and are an overriding factor in terms of requirements. 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 part of the development 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.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Arun Local Plan policies W SP1, W DM1, W DM2 and W DM3. This is required to be a precommencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.”

Condition 7 is worded as follows:

“The extension/new building shall not be occupied until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Arun Local Plan policies W DM1, W DM2 and W DM3. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.
2. Drawings submitted suitable for approval, with comprehensive justification provided for deviation from standards.

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

Application Reference: A/177/25/DOC Site Name: Rustington Golf Centre Golfers Lane Angmering BN16 4NB	Initial Issue Date: Issue Date: 26/02/2026 Reviewer Reference: ADC/EXT3/RW
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Summary and Recommendation:

Condition 6: **Support**

Condition 7: **Support**

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	ADC Drainage Comments		
Date:	10/12/2025	19/01/2026			
Condition Number: 6					
Comment Number					
1.	Please supply a statement of compliance or departures from the National Standards for SuDS. Where a departure is requested, please justify why such a request should be considered.	Statement of compliance with the NSS provided.	Justification provided with high groundwater levels and failed soakaway tests.		
2.	Please supply adequate groundwater monitoring. Please supply the SI report referred to in paragraph 2.5 of the Drainage Statement.	Groundwater monitoring data provided.	confirmed		
3.	Please submit the full infiltration test report, if different to the SI report above mentioned.	Full SI report provided.	confirmed		
4.	It is noted that the iPlant Geotechnical recommended	As outlined in the submitted drainage statement and	confirmed		

	that infiltration testing should be undertaken at greater depth. Please demonstrate that infiltration has been adequately investigated and ruled out in accordance with the SuDS hierarchy and your own technical investigations.	discussed in previous meeting with ADC's drainage engineer, the chalk stratum at the site is located a minimum of 3.0m below ground level. The highest recorded groundwater level is at 3.93m below ground level. It is therefore not possible to provide a working infiltration feature with a 1m standoff (buffer) above the groundwater table.			
5.	Please demonstrate why water reuse is not being proposed in accordance with the SuDS hierarchy, as West Sussex is water stressed, there is likely a need for non-potable water with a catchment area, and it could be reused for irrigation of the site.	The proposed drainage connects back to the existing drainage network on the golf course, which feeds into 2 further irrigation ponds (see page 10 of CCTV report) located within the golf course. These are used to meet the irrigation requirements of the golf course. The provision of standalone water butts for the proposed driving range extension and retail unit would be of such a small scale compared to the irrigation requirements for the site as a whole that it is considered more efficient to make use of the established downstream irrigation ponds.	CCTV survey proves water reuse is being undertaken through the use of irrigation on site.		

6.	Please provide full CCTV survey and report.	Provided.	confirmed		
7.	Natural and proposed flow paths should be shown on plan. These should account for low flow route, overflow routes and exceedances flows.	Flow path arrows shown.	Flood paths show exceedance routing would flow away from development		
8.	Please demonstrate that there is no interaction between the SuDS design and area of high surface water flood risk immediately to the west of the proposed swale. If there is any risk of conflict between the two, then the surface water flood risk volume will need to be accounted for in the design.	Area of surface water flood risk now mapped on the drainage strategy drawing to demonstrate that there is no impact.	Confirmed		
9.	Please provide Interception assessment which demonstrates compliance with the NSFS. Comments para 3.9 are noted, however, these do not constitute a full assessment. Should 1m of unsaturated ground between the base of the tank and groundwater levels be proven, you may wish to consider if the tanks need to be impermeable lined. A permeable liner may be used to allow for infiltration for interception purposes. Further information regarding	Refer to NSS compliance note.	Noted, justification for deviation from standard is robust.		

	interception at Interception drainage Arun District Council				
10.	Please submit evidence that the proposed connection and flow rate are acceptable to the risk management authority (Environment Agency) as the receiving waterbody is a main river. If a flood risk activity permit is required for the additional flow that is ultimately connected to this river (via the existing piped network), please submit that permit or alternatively please submit the evidence of the exemption.	Refer to email correspondence with ADC dated 16.01.2026	Confirmed as acceptable		
11.	If any work to the existing drainage following receipt of the CCTV survey is needed, please clarify what these works are on plan.	Notes clarified on plan.	confirmed		
12.	Please submit updated greenfield run-off rates based on FEH methodology (not IH124).	Submitted. Note that the IH124 calculated rates were lowered than FEH22 (worst-case scenario).	Confirmed appropriate, minimum viable rate utilised.		
13.	Please submit FEH22 data files. In accordance with clause 5.1.7 of the FEH Web Service terms of use . These must be submitted directly to land.drainage@arun.gov.uk	Submitted to land drainage email address.	Received		

	rather than to the planning portal (via the planning officer), this is to ensure that the data remains confidential in accordance with those terms.				
14.	Please include the area of the swale in your contributing areas plan/calculation.	Now included.	Noted on calculations pack		
15.	It appears that the swale is immediately adjacent to a group of trees. Please clearly demonstrate on plan the root protection areas of these trees and measures to protect drainage features from root damage. (If the swale needs to be lined to prevent groundwater ingress – if there is less than 1m of unsaturated ground between the base of the swale and the peak groundwater level.)	RPA for adjacent group of trees now clarified on the drawing – and swale design adjusted to suit. The tree group is entirely located on the west side of the existing fence (remaining in situ). It is not expected that the tree root will impact the proposed swale in its updated location.	noted		
16.	Please provide your design settings for your calculations.	Calculations reprinted with design settings shown.	noted		
17.	Please demonstrate that water quality and treatment have been appropriately assessed, appropriate for the size and scale of development.	This was address in section 3.8 of the submitted statement. An additional table (simple index approach) has now been provided in the NSS compliance note.	noted		
Condition Number: 7					
Comment Number					

1.	Condition 7 cannot be discharged until key elements for Condition 6 are provided	Noted	Condition 6 approved.		
2.	The SuDS Maintenance Manual should be a separate standalone document. The information submitted in appendix F of the Drainage Statement is noted and used to inform further comments.	Provided as a separate document.	Noted and agreed		
3.	Please ensure there is no conflict between surface water drainage infrastructure and the existing tree planting to the west.	No conflict – see clarifications above and updated plan provided.	agreed		
4.	Please provide a construction method statement, appropriate to the size of development.	Final construction method statement to be provided by selected contractor. Refer to NSS compliance note for recommendations and requirements.	Method statement constraints set out within documentation,		
5.	Please provide details of your overall design strategy.	Provided in introduction.	Noted		
6.	Please ensure that the written schedule for each of the SuDS components details how they should operate and their purpose.	Information added.	noted		
7.	Please ensure that, for each component, details of potential performance risks are included.	Information added.	Noted		

8.	If any of the SuDS components have a particular risk of failure should incorrect or inadequate maintenance be undertaken, please provide details.	Information added.	Noted		
9.	Please provide the approved detailed design drawings as part of the maintenance pack.	Included in Appendix A.	Noted		
10.	Although it is assumed that the golf course will fund the maintenance and management of the system, please provide written confirmation of this within the maintenance pack.	Written confirmation provided.	Noted		
11.	Please provide a checklist to facilitate consistent inspections of the system.	Included in Appendix B.	Noted		
12.	Please provide contact details for who should be contacted should the SuDS not function correctly.	Included in Section 1.	noted		
13.	Please provide a maintenance record pro forma.	Awaiting confirmation	Noted as included in report		
14.	Please provide details of where sediment and organic material arisings will be stored or disposed of.	The proposed SuDS comprises a small-scale swale and attenuation tank serving a limited extension to an existing golf driving range. The contributing catchment is modest in size and	Noted as suitable for the usage and context of development		

		predominantly comprises landscaped and managed grassed areas, with no known or anticipated sources of significant contamination. As such, sediment accumulation is expected to be minimal in volume and low in pollutant loading, consisting primarily of inert soils and organic matter typical of maintained golf course environments. Routine inspection and maintenance will be undertaken in accordance with standard SuDS best practice, with sediment removal only required infrequently and in small quantities. Any sediment arising from maintenance activities would be visually inspected and, given its anticipated non-hazardous nature, would be either reused on site (for example, regrading within landscaped areas) or removed by a suitably licensed contractor and disposed of at an appropriately permitted facility, should off-site disposal be necessary. Given the scale of the development, the low-risk land use, and the expected			
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		characteristics of the sediment, the preparation of detailed storage and disposal proposals would be disproportionate.			
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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.

PL- Consultation- Engineers response



Arun District Council, Civic Centre, Maltravers Rd
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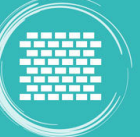
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Fulfilling Arun's economic potential



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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 17 March 2026 15:31
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 Re-Consultation on: A/177/25/DOC

Please find enclosed our consultants response, recommending discharge of conditions 6 and 7.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 16 February 2026 15:07
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Re-Consultation on: A/177/25/DOC

To: **Engineers (Drainage)**

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NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No:	A/177/25/DOC
Registered:	24th November 2025
Site Address:	Rustington Golf Centre Golfers Lane Angmering BN16 4NB
Grid Reference:	505472 103584
Category:	Discharge of Condi
Description of Works:	Approval of details reserved by condition imposed under A/163/24/PL relating to conditions 6-surface water drainage scheme and 7-maintenance and management of surface water drainage system.

I am able to inform you that I have received an amendment to the above application dated 9th February 2026 relating to: Additional drainage information

If you should wish to make further representations as a result of this amendment, please make any further comment by **2nd March 2026**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Kathryn Welch

Planning Case Officer-Arun District Council

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Email: kathryn.welch@arun.gov.uk

PLRECON_DOC (ODB) 2020