

Engineers Comments Regarding Surface Water Drainage

Application Reference:	A/177/25/DOC	Reviewer Reference:	ADC/KW/SB
Planning Officer:	Kathryn Welch	Date of Review:	15/12/2025
Site Name:	Rustington Golf Centre, Golfers Lane		
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:	1 of 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	Condition 6: Objection Condition 7: 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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 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	Insufficient	Objection
2. Interception drainage	Insufficient	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	Objection

Reviewed Plans

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

- **SuDS Drainage Statement by gta – second issue.**

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.

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.

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.

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	Initial Issue Date: 15/12/2025 Issue Date: Reviewer Reference: ADC/KW/SB
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Summary and Recommendation:

Condition 6: **Objection**

Condition 7: **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			
Date:	10/12/2025				
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.				
2.	Please supply adequate groundwater monitoring. Please supply the SI report referred to in paragraph 2.5 of the Drainage Statement.				
3.	Please submit the full infiltration test report, if different to the SI report above mentioned.				
4.	It is noted that the iPlant Geotechnical recommended 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.				
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.				
6.	Please provide full CCTV survey and report.				
7.	Natural and proposed flow paths should be shown on plan. These should account for low flow route, overflow routes and exceedances flows.				
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.				

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 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.				

11.	If any work to the existing drainage following receipt of the CCTV survey is needed, please clarify what these works are on plan.				
12.	Please submit updated greenfield run-off rates based on FEH methodology (not IH124).				
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 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.	The discharge rate appears to be arbitrary, please demonstrate why a lower discharge rate cannot be achieved.				
15.	Please include the area of the swale in your contributing areas plan/calculation.				
16.	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.)				
17.	Please provide your design settings for your calculations.				
18.	Please demonstrate that water quality and treatment have been appropriately assessed, appropriate for the size and scale of development.				
Condition Number: 7					
Comment Number					
1.	Condition 7 cannot be discharged until key elements for Condition 6 are provided				
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.				
3.	Please ensure there is no conflict between surface water drainage infrastructure and the existing tree planting to the west.				
4.	Please provide a construction method				

	statement, appropriate to the size of development.				
5.	Please provide details of your overall design strategy.				
6.	Please ensure that the written schedule for each of the SuDS components details how they should operate and their purpose.				
7.	Please ensure that, for each component, details of potential performance risks are included.				
8.	If any of the SuDS components have a particular risk of failure should incorrect or inadequate maintenance be undertaken, please provide details.				
9.	Please provide the approved detailed design drawings as part of the maintenance pack.				
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.				
11.	Please provide a checklist to facilitate consistent inspections of the system.				
12.	Please provide contact details for who should be				

	contacted should the SuDS not function correctly.				
13.	Please provide a maintenance record pro forma.				
14.	Please provide details of where sediment and organic material arisings will be stored or disposed of.				

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.

From: Breezie Allwright
Sent: 16 December 2025 09:39
To: Planning Scanning
Subject: Fw: Planning Consultation on: A/177/25/DOC
Attachments: A-177-25-DOC Rust golf club.docx

A/177/25/DOC
PL- consultation- engineers

Breezie Allwright
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Please note my working days are Monday, Tuesday, Wednesday and Friday.

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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: Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Sent: 15 December 2025 17:30
To: Planning.Responses <Planning.Responses@arun.gov.uk>; Kathryn Welch <Kathryn.Welch@arun.gov.uk>
Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Paul Cann <Paul.Cann@arun.gov.uk>
Subject: RE: Planning Consultation on: A/177/25/DOC

Please find attached the response from the engineers; an objection.

Many thanks,

Kathryn Welch
Senior Planning Officer, Planning Department

Please note: My working hours are currently split between Development Management and ADC Engineers, which may result in extended response times. **Development Management:** Tuesdays and Thursdays **ADC Engineers:** Mondays, Wednesdays, and Fridays

T: 01903 737789
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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: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 25 November 2025 08:18
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: A/177/25/DOC

To: **Engineers (Drainage)**

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
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.

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 by **9th December 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

Harry Chalk

Planning Case Officer- Arun District Council

Telephone: 01903 737577

Email: harry.chalk@arun.gov.uk