

Engineers Comments Regarding Surface Water Drainage

Application Reference:	R/93/25/DOC	Reviewer Reference:	ADC/EXT2/D2134/78
Planning Officer:	Simon Davis	Date of Review:	03.09.2025
Site Name:	Rustington Convalescent Home Sea Road Rustington BN16 2LZ		
Application Description:	Approval of details reserved by condition imposed under reference R/258/18/PL relating to condition number 19 - foul and surface water sewerage disposal.		
Assessment Number:	1 of 2		

Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance - <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/> and <https://www.arun.gov.uk/land-drainage-consent/>

Arun District Council surface water pre-commencement conditions - <https://www.arun.gov.uk/planning-pre-commencement-conditions>

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>

The SuDs Manual [C753] by CIRIA

Response

Condition 19: **Further information required**

Critical Items for Surface Water Drainage Design Conditions

The failure to adequately address the following items will result in an objection to a surface water drainage design.

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.

Critical Item	Reason	Status
Winter groundwater monitoring data.	Adequate winter groundwater monitoring data must be supplied to evidence that infiltration designs have sufficient freeboard from the base of structures and the peak groundwater level. The same data is necessary to ensure that the potential for buoyancy has been adequately considered in attenuation designs.	Compliant

Winter infiltration testing data.	Adequate winter infiltration testing must be supplied to justify the proposed discharge method and design infiltration rates. Infiltration tests must be completed strictly in accordance with BRE DG 365, CIRIA R156 or a similar approved method. Testing depths must account for peak groundwater levels and correspond with the location and depth of proposed infiltration features. Designs must be based upon the <u>slowest</u> infiltration rate evidenced closest to a proposed infiltration feature. Average design rates will not be accepted. The results of incomplete tests should not be extrapolated to obtain design values for infiltration rates.	Compliant
The hierarchy for sustainable drainage.	The proposed discharge method must accord with the SuDS hierarchy as given below. Evidence must be supplied to justify the proposed discharge method. 1. Rainwater reuse where possible. 2. Complete discharge into the ground (infiltration). 3. Hybrid infiltration and restricted discharge to an appropriate water body or surface water sewer. 4. Restricted discharge to an appropriate water body. 5. Restricted discharge to a surface water sewer. 6. Restricted discharge to a combined sewer. A water body may be defined as a river, watercourse, ditch, culverted watercourse, reservoir, wetland or the sea. Engineers cannot support any proposed connection of surface water to the foul sewer.	Compliant
Calculations	Calculations for pre-development run off rates must be based upon the positively drained area only. Proposed discharge rates must not increase flood risk on site or elsewhere. Discharge	Insufficient

	rates must be restricted to QBAR or 2 l/s/ha, depending on whichever is higher.	
	Designs must be based on the most recently available rainfall data at the time of conditions being applied. <u>FSR rainfall data will not be accepted.</u> FEH rainfall data is based upon more recent records and continues to be updated.	Compliant
	Designs must use the correct climate change allowances at the time of determination of the outline or full planning application. CV values for all events must be set to 1. This includes summer, winter, design, and simulation events. The correct allowance for urban creep must be applied. Additional storage must be set to zero unless it can be evidenced where this is provided. Infiltration half-drain times must be less than 24 hours. Infiltration design rates must be applied to the sides of soakaways, or to the base of infiltration blankets. Design rates must not be applied to both the base and sides of infiltration structures. A surcharged outfall must be modelled.	Insufficient
Natural catchments design.	The submission must define the natural drainage characteristics within, and hydraulically linked to, the site and demonstrate that the drainage proposals will integrate with and not compromise the function of the natural and existing drainage systems. The condition, performance (including capacity where appropriate) and ownership of any existing site surface water drainage infrastructure must be accurately reported. Appropriate easements to watercourses and other services must be shown on all plans. Where there are areas of flood risk from any source on the site, it must be shown how a sustainable surface water drainage design can	Compliant

	be accommodated on the site without conflicting with those areas of flood risk. Designs must replicate the natural drainage catchments of the site. All surface water drainage designs must therefore drain via gravity to corresponding points of discharge. The use of pumps for surface water drainage is not sustainable and will only be considered where the designer has fully demonstrated that they are proposed as a last resort.	
Plans	Plan areas, depths and levels of drainage infrastructure must accurately correspond with the supporting calculations.	Insufficient
Water quality benefits.	An assessment of water quality is necessary to evidence that the proposed design provides adequate treatment of surface water.	Compliant
Biodiversity and amenity benefits.	The surface water drainage design must provide biodiversity and amenity benefits.	Compliant
Trees and planting	There should be no conflict between surface water drainage infrastructure and existing or proposed trees or planting. The design must consider the potential growth of proposed trees and adequate mitigation must be provided to protect drainage infrastructure where conflict cannot be avoided.	Compliant

Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only.

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, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)
- ☐ Other:
- ☐ None

Additional comments to the planning officer

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' 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.

This consultation has been primarily informed by The SuDS Manual.

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

- Drainage flow data 15.5.25 Project 25-043
- Levels Layout Sheets 1-3 (25-043-100; 101; 102)
- Manhole Schedule (25-043-109)
- Drainage Construction Details - Sheets 1 to 3 (25-043-110; 111; 112)
- External Works Sheets 1 to 3 (25-043-120; 121; 122)
- External Works Construction Details (25-043-123)
- Highway Long Sections Sheets 1 to 4 (25-043-135;136;137;138)
- Drainage Long Sections (25-043-139)
- Permeable Paving Sub-Base Levels (25-043-150)
- Site Investigation and Infiltration Features (25-043-SK001 Rev.C)
- Pre-development Overland Flow Routes (25-043-SK002)
- Drainage Layout Sheet 1 of 3 - 25-043-105 Rev A
- Drainage Layout Sheet 2 of 3 - 25-043-106 Rev A
- Drainage Layout Sheet 3 of 3 - 25-043-107 Rev A
- Drainage Layout Overall - 25-043-108 Rev A
- Hydraulic Model Data - 25-043-151 Rev. A
- Hydraulic Model Schematic - 25-043-152 Rev. A
- Infiltration testing survey and report - Ref: PM/25/3705892/R1 13th May 2025
- Drainage Maintenance and Management Plan - May 2025
- Drainage Technical Note - August 2025

Please refer to the comments tracker for outstanding comments that require further information.

Application Reference: R/93/25/DOC Site Name: Rustington Convalescent Home Sea Road Rustington BN16 2LZ	Initial Issue Date: 03.09.2025 Issue Date: 03.09.2025 Reviewer Reference: ADC/EXT2/D2134/78
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Summary and Recommendation:

Condition 19: **Further information required**

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 recommend that the application is refused.

	Comment History [R/20/24/2025]	Designer Response	ADC Drainage Comments		
Date:	As shown	20.05.2025	03.09.2025		
Condition Number: 19					
Comment Number					
1.	ADC Drainage Comments 28/02/2024: A drainage strategy has been prepared by Ruby & Stagg Ltd dated June 2018. This advises a surface water strategy to utilise soakaways. Reference is made under application R/85/18/DOC to FRA which includes the Soakage Test Letter by Geo-Environmental, ref JT01 180228. Dated 28th February 2018, however this has not be submitted under the application. Please ensure all applicable data is submitted. Designer Response 25/06/2024: The proposes Surface Water drainage strategy combines infiltration and attenuation using the latest soakage test results. ADC Drainage Comments 31/07/2024: The latest data set provided by LEAP contains a location plan, trial holes and infiltration testing results, no summary and/or recommendations.	We have prepared dedicated drawing 25-043-SK001 and drainage tech note 25-043-01 discussing infiltration suitability and groundwater (GW) aspects of the design. In the infiltration design we have used the worst-case infiltration rate obtained from the closest suitable BRE365 testing location. Some of these rates were already discussed and conformed by Arun DC (email on the 2025-04-24 appended to report 25-043-01).	Comment closed.		

	There is insufficient geotechnical/engineer summary to demonstrate the parts of the site (plan with approximate findings) that are suitable for infiltration and where a tanked approach is required. Comment outstanding. Designer Response 18/08/2024: Please see LEAP Phase 3 report, ref LP3667/Ph3, which provides the data from the field tests with calculated infiltration rates. See Odyssey drawings 24-059-105, 106 and 107 which include the locations of the testing and results. Based on the results of percolation tests Odyssey have calculated the areas that are suitable for infiltration and areas which do not support infiltration. The Odyssey details also indicate which tanks and permeable paving sections are infiltrating, and which are non-infiltrating (and therefore providing conveyance/ storage function only). ADC Drainage Comments 28/10/2024: The latest data set provided by LEAP contains a location plan, trial holes and infiltration testing results. Simply adding the variable data to the drawings in not accepted as a summary and/or recommendations is required generally considering the worst case scenario. There is insufficient geotechnical/engineer summary to demonstrate the parts of the site (plan with approximate findings) that are suitable for infiltration and where a tanked approach is required so supporting geotech plan to highlight this is required. Comment outstanding.				
2.	ADC Drainage Comments 28/02/2024:	The updated drainage plans are now: 25-043-105 to 108. We have purposely omitted	Comment closed.		

	A subsequent drainage statement has been prepared by GTA, dated 16th February 2022 which is understood to be the current report. Designer Response 25/06/2024: Refer to drawings:- - Drawing 24-059-SK005 – Surface Water Drainage Strategy Sheet 1 of 3. - Drawing 24-059-SK006 – Surface Water Drainage Strategy Sheet 2 of 3. - Drawing 24-059-SK007 – Surface Water Drainage Strategy Sheet 3 of 3. Associated calculation also included. ADC Drainage Comments 31/07/2024: These drawings are badged 'SK' inferring this is not a detailed design for construction purposes, as is required for a DOC discharge. These 'strategy' drawings cover high level and not detail, i.e. missing foul design, no FFL's, spots levels, gradients, low points, etc. Therefore we would expect supporting drawings for a full civils package including levels, drainage, surface finishes. Comment outstanding. Designer Response 18/08/2024: Please see the Odyssey drawings 24-059-105, 106 and 107 which indicate all drainage details requested. ADC Drainage Comments 28/10/2025: These drawings are still not sufficient for construction purposes, as is required for a DOC discharge.	levels from drainage drawings 25-043-105 to 107 as to avoid placing too much detail and information that would make actual drainage aspects less visible. We have however created drawing 25-043-108 which is showing drainage overall plan with detailed levels added.			
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	It is noted that additional drawings 105,106,107,108 do provide a fuller civils package including road levels, drainage, however the full site design is still missing in terms of level design coverage. Comment outstanding.				
3.	ADC Drainage Comments 28/02/2024: The aforementioned GTA report includes further infiltration testing undertaken by Ashdown Investigation Ltd dated Feb 2022. This concludes infiltration to be viable as summarised in table 2 (compliant to BRE365), with advisory to the standard 5m BRegs stand-off distance. Designer Response 25/06/2024: Refer to LEAP Environmental Soakage Testing results. ADC Drainage Comments 31/07/2024: Noted. As above there is no summary or recommendations in respect of the design infiltration rate. Furthermore the calculations clearly show various inflation rates being used which is of concern. The worst case rates must be used and suitable engineers evidence shall be provided to qualify criteria. Comment outstanding. Designer Response 18/08/2024: Please see Odyssey drawings 24-059-105, 106 and 107 which indicate the location of percolation testing, their results and details. Odyssey have adopted infiltration rates for infiltrating structures that commensurate with the field findings appropriate for a given location. ADC Drainage Comments 28/10/2025:	We have prepared dedicated drawing 25-043-SK001 and drainage tech note 25-043-01 discussing infiltration suitability and groundwater (GW) aspects of the design.	Comment closed.		

	Noted. As above there is no summary or recommendations in respect of the design infiltration rate. Furthermore the calculations clearly show various infiltration rates being used which is of concern. The worst case rates must be used and suitable engineers evidence shall be provided to qualify criteria. Comment outstanding.				
4.	ADC Drainage Comments 28/02/2024: Groundwater monitoring has been undertaken over the winter period. This appears to have some tidal influence with a seasonal peak of the order of 1.9m AOD. In light of the above compliance with the EA guidance in providing a 1.0m freeboard between the base of an infiltration feature and seasonal peak groundwater level it remains unclear if the permeable pavement depth / formation level comply. Section 4.0 suggests a formation of 2.383m AOD (zone 9) which would inform a freeboard of 480mm; this does not comply with ADC standing advice. Furthermore it has been acknowledged there is a tidal impact here so it is considered a suitable freeboard is essential for the design life of the site when factoring in sea level rise. Designer Response 25/06/2024: See included drawings and calculations. ADC Drainage Comments 31/07/2024: No further evidence has been provided in respect of groundwater and the response to this comment is inadequate.	As per point '2' above. Inspection of drawings and levels of proposed system indicate that no infiltration features (including permeable pavements (PP)) would have their base set below the GW level. The design would provide freeboard (unsaturated zone) and this aspect is further explained in the drainage tech note 25-043-01.	Overall the site complies with a 1m freeboard to GW. SK001 advises a higher GW observed at 3.03m AOD, and the formation of tank 4 is 2.95m essentially at the same level. Technical note 2.2.4 & 2.2.5 summarise this and make assumptions in respect of freeboard, so before any relations can be considered the designer must summarise the worst case scenario and advise IF storage volume is compromised. Where would flooding occur and how would this volume be managed?		

	Drainage strategy drawings 1,2,3 do not include any reference to groundwater and freeboard to all SUDS features. Comment outstanding. Designer Response 18/08/2024: Please see Odyssey drawings 24-059-105, 106 and 107 which indicate the location of groundwater (GW) monitoring locations and highest recorded level. Proposed infiltration features have their base level located above the highest recorded GW levels at the appropriate locations. ADC Drainage Comments 28/10/2025: No further evidence has been provided in respect of groundwater and the response to this comment is inadequate. Whilst drainage layout drawings 105,106,107,108 annotate all geotechnical testing locations with groundwater levels, however numerous permeable pavement depths appears to sit below the peak groundwater datum. It is evident there does not appear to be any freeboard between any SUDS feature 'base' and 'peak GW' and the permeable pavement depths are variable. It remains unclear if the designer has made allowances for saturated storage. Comment outstanding.				
5.	ADC Drainage Comments 28/02/2024: Drawing 1005 illustrates 9 zones with numerous stated as 'infiltration nil' and a '150mm control', please clarify via a drawing the areas of the site where blanket	As per point '2' above.	Comment closed.		

	infiltration will be utilised and remaining areas that are deemed unsuitable. Furthermore the designer must clarify the infiltration design rates used tally with the 3rd geotechnical test results and demonstrate worst case results have been adhered to. Designer Response 25/06/2024: Refer to drawings referred to above and associated calculations which note the infiltration rates. ADC Drainage Comments 31/07/2024: As noted above the designer has not qualified the infiltration rates used. Comment outstanding. Designer Response 18/08/2024: As per above comment to point 4. ADC Drainage Comments 28/10/2025: As noted above the designer has not qualified the infiltration rates used. Comment outstanding.				
6.	ADC Drainage Comments 28/02/2024: Please provide a site plan / topographic survey detailing the historic overland flow routing. ADC Drainage Comments 31/07/2024: No information supplied. Comment outstanding. Designer Response 18/08/2024:	Please refer to drawing 25-043-SK002 for the historic overland flow analysis.	Comment closed.		

	Please refer to the topographical survey which indicates topography to be sloping from East to West towards the Mewsbrook Park. ADC Drainage Comments 28/10/2025: A topographical survey in isolation does not highlight historic overland flow routes; this shall be applied by the designer. Comment outstanding.				
	Drawings 1901/1902				
7.	ADC Drainage Comments 28/02/2024: Permeable pavement formation levels must be annotated. Designer Response 25/06/2024: Base levels are shown on the Drainage strategy. ADC Drainage Comments 31/07/2024: Base level appears to be either 2.88 or 2.87; which is correct? It is noted that the permeable sub-base formation is intended to be flat, therefore depths are varied to form the final profile. In some areas depths are noted in excess of 1.44m however Sketch drawing 008 illustrating the stand detail does not qualify the greater depths and if geogrid will be required. Bespoke construction details must be provided for all SUDS features; for permeable pavements any check dams, breaks, pipe links needs to be detailed. The drainage strategy plans illustrative numerous diffusers units with linking under drains, however there is insufficient information on both the plans and detailing to understand so how will the contractor build it.	Although the permeable paving (PP) system is complex the construction detail of permeable paving provided on drawing 123 is universal with only the thickness of sub base being varied – and this would depend on the final surface finish level. The PP sub base level is noted on a dedicated sub-base level drawing 25-043-150. There is no proposal to use geogrid at the moment and any low CBR case would be addressed by adding appropriate capping below PP sub-base. Please refer to drawing 112 where underdrains arrangement is detailed.	Drawing 123 is accepted. The PP sub base formation levels illustrated on drawing 150 is accepted, however the extents of the impermeable liner are impractical for a contractor to install; this needs further consideration to ensure the desired strategy is compliant. Please review in logical blocks and a contractors method statement is provided. Please note underdrain comments below. Why are these needed? How can these be maintained where there are significant bends?		

	Comment outstanding. Designer Response 18/08/2024: Please see Odyssey drawings 24-059-105, 106 and 107 which indicate sub-base levels for permeable paving at the start and end of respective sections. Please note that for permeable paving where infiltration is used the base is assumed as flat. For permeable paving sections where their main purpose is to convey water (to sections that infiltrate) the levels are provided for the sub-base at its upstream and downstream extent with the constant gradient in between. The thickness of sub-base is not constant and on standard detail drawing 24-059-123 it is noted that "sub-base thickness to be calculated based on the sub-base formation level and surface finished levels". Drawing 24-059-123 together with drawings 24-059-110 and 24-059-111 details appropriate construction for drainage and road make-ups. ADC Drainage Comments 28/10/2025: Base level appear to vary across the site hence this is a complex solution. It is noted that the permeable sub-base formations are mixed being flat and sloped and the depths are variable The permeable details on drawing 123 are too generic and do not reflect the greater depths and if geogrid/structural support will be required. Bespoke construction details (& site cross sections) must be provided for all SUDS features; for permeable pavements any check dams, breaks, pipe links needs to be detailed. The drainage strategy plans illustrative numerous diffusers units with linking under drains, however there is insufficient information on both the plans and detailing to understand so how will the contractor build it.				
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	Comment outstanding.				
8.	ADC Drainage Comments 28/02/2024: Supporting construction details will be required. It is fundamental to detail all drainage related features including permeable pavements and pollution control features. Furthermore it is recommended that surface finish information is also supplied. Designer Response 25/06/2024: See Drawing 012-050. See Hard Landscaping materials schedule. ADC Drainage Comments 31/07/2024: Drawing not supplied (also not listed in the revised statement contents). Comment outstanding. Noted, no comments. Designer Response 18/08/2024: See Odyssey Drawings 24-059-123, 24-059-110 and 24-059-111 which detail the appropriate construction for the drainage and road make-up. Drawings 24-059-120 to 122 show various surface finishes across the site. ADC Drainage Comments 28/10/2025: Noted, however as commented in item 9, further information is required to cover all bespoke features. Comment outstanding.	Construction details for SuDS and drainage components are provided on drawings 25 043-110 to 112. Geocellular crates will have various dimensions, but these are then provided on drainage plan or via suitable notes.	These drawings are accepted, however further information is required. As per drawing 25-043-108A, there are numerous bespoke features shown with significant PP formation pipes (GREEN) without supporting construction details. Furthermore the addition of these pipes may impact of the 1D modelling where run-off may be conveyed to lower areas quicker than intended. Further detail and summary is required.		
9.	ADC Drainage Comments 31/07/2024:	As per point '10' above.	As per point '8' response.		

	Further construction details of TANK 3 are require to appropriately demonstrate how this will be installed underneath a permeable pavement. Designer Response 18/08/2024: Refer to Odyssey drawing 24-059-111 for details of the tank. The water would permeate through the permeable paving structure and then flow into the tank via the geotextile. ADC Drainage Comments 28/10/2025: Generic details are not accepted. Further construction details of all SUDS features are require to appropriately demonstrate how this will be installed underneath variable finishes.				
10.	ADC Drainage Comments 28/10/2025: Cross sections are require where there are split permeable paving types and underdrains.	The interconnected sections of PP are provided on drawings 25-043-135 to 138.	As per point '8' response.		
11.	ADC Drainage Comments 28/10/2025: What is the size and shape of geocellular tanks 5 & 6;this appears to be amorphous hence unbuildable?	Tanks No.5 and 6 replaced by permeable paving with storage provided by a sub-surface granular material.	Comment closed.		
12.	ADC Drainage Comments 28/10/2025: Diffuser used for infiltration must be located at least 5m from any structure.	Diffuser units moved 5m away from structures where feasible. Please note that impermeable membrane is shown within 5m away from structures thus diffuser units could be installed closer than 5m in such instances – as water infiltration would be taking place 5m away from structures.	Comment closed.		
	Hydraulic Calculations:				

13.	ADC Drainage Comments 28/02/2024: The 1D model must include a supporting plan to denote all nodes/links or cascade approach. Designer Response 25/06/2024: See Drawings. ADC Drainage Comments 31/07/2024: The drainage strategy plans and Infodrainage calculations do not tally. There are numerous catchment areas not identified on any plans. Comment outstanding. Designer Response 18/08/2024: Refer to Infodrainage calculations '24-059 - Rustington, Sea Road_SW system' including the catchment plan which provides the requested information. ADC Drainage Comments 28/10/2025: The drainage strategy plans and Infodrainage calculations do not tally. There are numerous catchment areas not identified on any plans. Comment outstanding.	Infodrainage model checked and all catchments updated. Please refer to drawings 25-043-151 and 25-043-152 and Infodrainage 25-043 Sea Road, Rustington_SW System printout for the details of catchments used in the model.	With reference to the 1D calculations and drawing 25-043-152A, it remains unclear what areas have urban creep applied. Furthermore urban creep is not mentioned in the technical note. Comment outstanding.		
14.	ADC Drainage Comments 28/02/2024: The WSCC surface water policy requires a design criteria for FEH 2022 and a CV value of 1.0 for both Summer & Winter scenarios. The current modelling is not acceptable. Designer Response 25/06/2024: The system has been designed to FEH 2022. ADC Drainage Comments 31/07/2024: The Infodrainage calculation outputs do not reveal all input criteria thus unable to qualify this is FEH22.	Infodrainage model printout updated.	Comment closed.		

	Full print out are required. Comment outstanding. Designer Response 18/08/2024: Refer to Infodrainage calculations '24-059 - Rustington, Sea Road_SW system' which provides the requested information. ADC Drainage Comments 28/10/2025: The Infodrainage calculations page 26 confirm FEH22, however the print outs lack of baseline criteria hence the CV values specified simulation cannot be seen. Comment outstanding.				
15.	A factor of safety must be declared where infiltration is used. Permeable pavement feature must clarify the inverts, ground levels and 'cap' sub-base depths. It may be necessary to explain system water depths on the supporting 1D model plan. Designer Response 25/06/2024: See Calculations. ADC Drainage Comments 31/07/2024: Noted, however the safety factor is only showing on certain elements of the design. Furthermore there is no explanation hence the response is inadequate. Comment outstanding. Designer Response 18/08/2024:	Infiltration used only for structures that would be supporting infiltration in the model – and which can be supported by BRE365 testing. Please note that to aid with the system emptying all structures that are further than 5m away from the building will help with infiltration (as these will not be lined) but were not used in hydraulic model as their infiltration could not be verified via BRE365 testing. Factor of safety was not needed and thus was not applied – as per Arun DC email on the 2025-04-24.	This comment does not appear accurate where the technical note confirms a factor of safety has been applied in 2.1.6. On this basis the comment is closed.		

	Refer to Infodrainage calculations '24-059 - Rustington, Sea Road_SW system' which specify FOS of infiltrating features and provides full modelling details. ADC Drainage Comments 28/10/2025: Noted, however the safety factor is only showing on certain elements of the design. Furthermore there is no explanation hence the response is inadequate. Comment outstanding.				
16.	ADC Drainage Comments 28/02/2024: Please summarise the half drain down time to 50% for each storage feature. This shall be illustrated for 10yr, 30yr, 100yr. Please note that our minimum compliance is required for at least the 10yr+CC (45%) storm. Designer Response 25/06/2024: See Calculations. Designer Response 18/08/2024: Whilst no comment has been made, the proposed design is supported by the Infodrainage calculations '24-059 - Rustington, Sea Road_SW system' which show water levels in the system for the 1 in 10 and 1 in 100 storm events – both allowing for climate change. Drainage plans 24-059-105, 106 and 107 specify then invert levels of connections and these were set to be not below the 1 in 10 water level (including climate change). ADC Drainage Comments 28/10/2025: Revised calculations required.	Half drain times for the 1 in 10 yrs + 45% event shown for each infiltration structure on the last pages of the Infodrainage 25-043 Sea Road, Rustington_SW System printout.	Comment closed.		

	Comment outstanding.				
17.	ADC Drainage Comments 28/02/2024: There is no drawings to demonstrate the existing and/or proposed impermeable area comparison and denote each catchment area to support the calculations areas. Designer Response 25/06/2024: See Drainage Strategy Drawings. Designer Response 18/08/2024: Whilst no comment has been made, the proposed design is supported by the Infodrainage calculations '24-059 - Rustington, Sea Road_SW system' including catchment plan that demonstrates connectivity of each sub-catchment into the respective part of the system. ADC Drainage Comments 28/10/2025: The key plan on page 1 of the calculations is illegible and does not quantify the catchments.	Please refer to drawing 25-043-152 that details catchments used in the model.	Comment closed.		
	Drainage & Maintenance Manual:				
18.	ADC Drainage Comments 28/02/2024: Whilst the schedule covers the main components, there is no supporting plan to denote the extents of maintenance requirements. Designer Response 25/06/2024: See Drawings. ADC Drainage Comments 31/07/2024: A revised drainage maintenance manual was request but not supplied. Comment outstanding. Designer Response 18/08/2024: Please refer to the Drainage Maintenance and Management Plan.	Please see updated maintenance plan document 25-043-02.	Comment closed.		

Surface Water Drainage Comment Tracker

	ADC Drainage Comments 28/10/2025: The maintenance document dated August 2024 is received, however does not comply with ADC's requirements (see website checklist) where a supporting drawing 'plan' must also be included.				
	Drainage Comments 28/10/2025: The report must ensure there are clear details of who to contact if the surface water drainage system is not functioning correctly.	Please see updated maintenance plan document 25-043-02.	Comment closed.		
	ADC Drainage Comments 28/10/2025: There is no action plan for dealing with accidental spillages of pollutants.	Please see updated maintenance plan document 25-043-02.	Comment closed.		
	ADC Drainage Comments 28/10/2025: There is no advice provided as to what to do if alterations are to be made to the development or, works are to be carried out which may affect the surface water drainage system.	Please see updated maintenance plan document 25-043-02.	Comment closed.		

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.

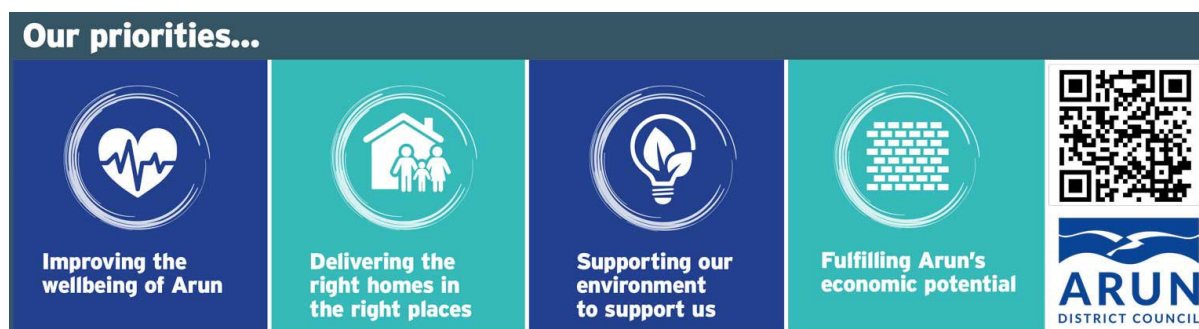
[REDACTED]

Drainage Engineers response

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 04 September 2025 10:19

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Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>

Subject: RE: Planning Consultation on: R/93/25/DOC

Please find enclosed our consultation prepared by our external consultant.

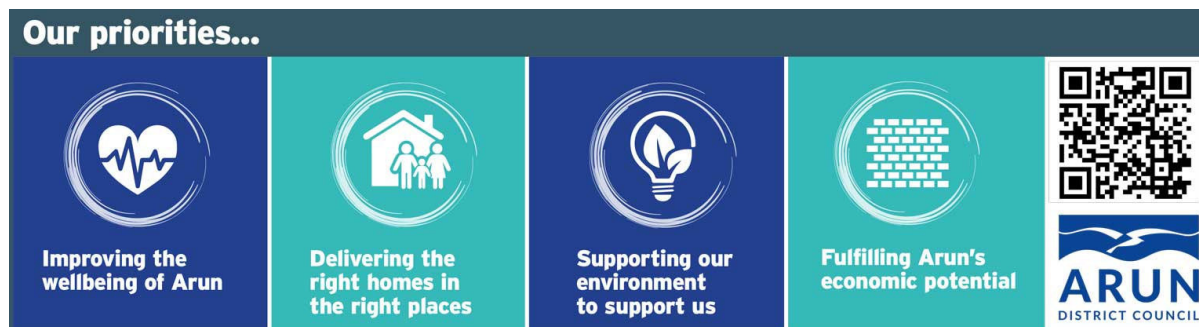
Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

E: paul.cann@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



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

Sent: Friday, May 30, 2025 11:48:39 AM (UTC+00:00) Monrovia, Reykjavik

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

Subject: Planning Consultation on: R/93/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: R/93/25/DOC
Registered: 29th May 2025
Site Address: Rustington Convalescent Home Sea Road Rustington BN16 2LZ
Description of Works: Approval of details reserved by condition imposed under reference R/258/18/PL relating to condition number 19 - foul and surface water sewerage disposal.

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 **13th June 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

Mr S Davis

Planning Case Officer- Arun District Council

Telephone: 01903 737874

Email: Simon.Davis@arun.gov.uk

PLCONDOC (ODB) 2020