

Consultant Response to Planning Comments

Application Ref: AL/118/25/DOC – Condition 4

Site Name: Land to the north of The Haven and East of Northfields Lane, Westergate PO22 3UH

Comment Number	ADC Drainage – 4 /12/25	Consultant Response – 9/1/26
1	The planning condition requires winter infiltration testing. None is submitted	In accordance with Local and National Drainage Policy, a 1m unsaturated ground is required between peak winter groundwater levels and the base of any infiltration feature. As noted below, peak groundwater levels to-date are 0.7mbgl, therefore, infiltration drainage is disregarded and proposed drainage discharge is to the boundary ditches, thus infiltration testing is not required.
2	The planning condition requires winter ground water monitoring. None is submitted. It must be evidenced that 1m unsaturated ground is provided between peak groundwater levels and the base of any infiltration feature.	Please see attached winter groundwater monitoring, which confirms winter groundwater levels recorded at up to 0.7mbgl to date.
3	The design does not include provision of Interception Drainage in accordance with the National SuDS Standards.	The design does include interception drainage via permeable pavement and rainwater harvesting, consistent with Arun District Council's interception drainage guidance - Arun District Council , and with National standards for sustainable drainage systems (SuDS). This was previously submitted so please re-review.
4	The planning condition requires an updated impermeable areas plan. None is submitted. This should include a summary and total including urban creep allowance.	The impermeable areas plan is shown within drawing 005 . This was previously submitted and does include a summary and total including urban creep allowance, so please re-review.
5	The proposed design peak outflow rates are arbitrary and not restricted to greenfield runoff rates in accordance with the National SuDS Standards. Design	Harbourstone has concerns about designing to very low discharge rates (e.g., <1 l/s) due to common technical and maintenance issues, including: ○ increased risk of blockage due to very small orifices,



	flow restriction should be based upon greenfield runoff equivalent for the drained area and if necessary a relaxation applied where constraints preclude meeting the GFR rate. Modern flow controls can achieve rates much lower than 1l/s.	○ inability to meet required 24-hour half-drain down times with very low discharge rates, ○ operational reliability under fine flow conditions, and ○ potential for surface water flooding due to blockage incidents. Industry Guidance cautions use of very low discharge rates due to the above reasoning, including but not limited to the National Standards for SuDS and CIRIA. It is worth noting also that discharge rates will be reduced by any viable infiltration within the permeable pavement (with allowance for infiltration not modelled but where possible provided for, as advised by ADC Drainage) as well as via rainwater harvesting.
6	The detailed drainage layout plans does not include finished surface levels. The base level of the permeable pavement storage should also be shown.	Finished surface levels are detailed in drawing 002 and base of permeable pavement are detailed in drawing 001 ; Harbourstone have also provided additional invert levels for completeness in updated plan.
7	The planning condition requires proof of consents for any discharge to watercourse. None are submitted. Ordinary Watercourse Consent is required for both outlets and the culverted section of exiting watercourse and 'watercourse corridor improvements' from WSCC.	Discharge consents have been submitted and are currently with Paul Cann for consideration. Final details have been agreed by email – evidence of Consent to be forwarded upon receipt.
8	Construction details should be provided for all drainage elements.	Construction details are provided within drawings 003 and 004, and covers all drainage elements. This was previously submitted so please re-review.
9	A surcharged outfall should be used in the drainage model for both outfalls and the design level justified.	Surcharged outfall has been included in the calculations as top of bank, as clearly stated in the report. This was previously submitted so please re-review.



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10	The permeable paving and flow control should be included in the drainage model.	Permeable pavement and flow control features are incorporated in the drainage model. This was previously submitted so please re-review.
11	The watercourse connection to the rear appears to be outside the planning red line boundary. Confirmation of land ownership or Easement for construction and maintenance access is required together with proof of legal right to discharge to the watercourse if not the Riparian Proprietor.	As our site boundary lies at the centre of the watercourse, we understand we have riparian responsibilities for that ditch . It is noted that Ordnance Survey and HM Land Registry datasets can differ, but the Applicant has confirmed the above.