



Neil Crowther – Group Head of Planning
Arun District Council
The Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

20 May 2025

Dear Neil,

**RE: Discharge of Pre-Commencement Condition 19
Planning Permission: R/258/18/PL
Rustington Convalescent Home, Sea Road, BN16 2LZ**

Please find enclosed documentation to discharge the pre-commencement condition attached to the above planning permission. I have set out below a summary of the proposed details and how it satisfies the condition requirements.

An application was previously submitted to discharge condition 19 (R/20/24/DOC); however, this was refused on 6 November 2024 for reasons relating to design of the surface water drainage and the foul water drainage. Prior to this decision being made, there was back-and-forth correspondence between Arun District Council and the Designer, regarding numerous points that were required to be addressed.

A summary of this correspondence is provided alongside this application in a document titled “Nov 24 SW Drainage Comments”. This document highlights 25 points which are addressed in this application. A summary of how these points is addressed in this application is shown below, using the same numbering as in the letter:

1. Comment closed by Arun District Council (ADC).
2. 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).
3. The updated drainage plans are now: 25-043-105 to 108. We have purposely omitted 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.



4. 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.
5. 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.
6. As per point '2' above.
7. Please refer to drawing 25-043-SK002 for the historic overland flow analysis.
8. Comment closed by Arun District Council (ADC).
9. 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.
10. 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.
11. As per point '10' above.
12. As per point '10' above.
13. The interconnected sections of PP are provided on drawings 25-043-135 to 138.
14. Tanks No.5 and 6 replaced by permeable paving with storage provided by a sub-surface granular material.
15. 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.
16. 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.



17. Infodrainage model printout updated.
18. 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.
19. 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.
20. Please refer to drawing 25-043-152 that details catchments used in the model.
21. Comment closed by Arun District Council (ADC).
22. Comment closed by Arun District Council (ADC).
23. Please see updated maintenance plan document 25-043-02.
24. Comment closed by Arun District Council (ADC).
25. Comment closed by Arun District Council (ADC).

I trust that you have everything in this submission to determine the Discharge of Condition application favourably. If you require further information, please contact me in the first instance, and I can put you in contact with the relevant technical colleague and/or the consultant.

Yours sincerely,

James Carson