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**Durrington Gasworks (Elizabeth Gardens Phase 2)**

**Response to Consultee Comments on Application No: AWDM/0628/26**

Our Ref: 2505550_C / Secretariat / Letters

10th November 2026

Dear Eleanor,

Further to your response on behalf of West Sussex County Council on 2nd September, Ardent Consulting Engineers (ACE) have been instructed to review the consultee comments in relation to the drainage drawing (2505550_C-ACE-XX-XX-DR-C-0601_P3 Proposed Drainage Strategy) and the surface water modelling and to provide a response and additional information. We have set out the received comments below, answering your queries on the application.

**Standard 1 (Runoff Destinations):**

1. As West Sussex is seriously water stressed and there is non-potable demand for water (for example toilet flushing for the dwellings and commercial floorspace), we would expect rainwater harvesting to be a material element of the SuDS scheme. This would also help with meeting the requirements of Standard 2. Southern Water provide Environmental Incentives for rainwater harvesting, when designed in accordance with their requirements.

2. As a result of high groundwater levels and contamination on the site and no water bodies nearby, it is proposed to discharge surface water from the majority of the site into the public surface water sewer in Martlets Way. This is owned by Southern Water.

The applicant has provided a Southern Water pre-planning enquiry response which confirms that capacity exists for a discharge rate of 11.5 l/s to the surface water sewer manhole in Martlets Way. Surface water from the development is proposed to connect to this sewer. It is acknowledged that both the proposed connection and the requisitioned sewer would be located outside the application red line boundary and within third-party ownership.

The proposed discharge rate from the development is 52.6 l/s, in accordance with the brownfield runoff rates set out within the National Standards for SuDS. However, Southern Water's pre-planning enquiry response indicates that only 11.5 l/s of capacity is available within the receiving surface water sewer at Martlets Way. As the proposed discharge rate is approximately five times greater than the identified available capacity, there is a significant risk that additional

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flows could surcharge the network and increase flood risk elsewhere. We therefore recommend that an updated capacity assessment is undertaken to demonstrate that the Southern Water surface water network can accommodate the proposed discharge without increasing flood risk on or off site.

***ACE Response***

*1. Systems for pumping rainwater back into individual houses is not feasible and cannot be relied upon for the surface water strategy due to cost and practicality. These systems provide limited attenuation capacity as the volumes available depend on usage patterns, and often the system capacity is reduced when the tanks are already full. Also, individual systems typically require below ground storage and a pump to make use of the stored water, both of which would rely on maintenance from the individual occupier indefinitely, as well as a telemetry system to assist with emptying the tank. A shared system would be easier to manage but there are no statutory bodies that will adopt or maintain a system that pumps attenuation back into multiple houses, or the right to enter homes to maintain such a system at a property level. However, rainwater harvesting in the form of water butts can be implemented in all gardens across the site to reduce the potable demand for irrigation. As there are 89 dwellings across the development, based on a 200L water butt being used across each dwelling, a total of 17.8m$^3$ of additional storage would be provided. The FRA has been updated to include this provision.*

*2. The previous pre-development enquiry was submitted on preliminary strategies. Southern Water will have the opportunity to reconsult on the application to confirm if capacity exists within the network to accommodate for the larger brownfield rate. They will also review the capacity during construction as part of the Section 106 connection, and requisition process.*

**Standard 2 (Interception):**

1. Whilst Table 7-2 has been provided to demonstrate how the interception requirement will be achieved through the use of attenuation basins, the proposed basin design appears to conflict with the requirements of the National Standards for SuDS. To achieve interception of the first 5 mm of rainfall and comply with Standard 2, detention basins should be designed as unlined features to allow infiltration and treatment of runoff.

2. It is also noted that the report refers to these features as “attenuation basins”. However, attenuation basins typically contain a permanent body of water, whereas the proposed features appear to function as detention basins, which are normally dry between rainfall events. Clarification is therefore required regarding the intended basin type and how the proposed design will achieve the stated interception requirements.

3. In addition, further information should be provided to demonstrate compliance with Standard 2 of the National Standards for SuDS. We would recommend that the applicant refers to the West Sussex County Council Sustainable Drainage Systems guidance. It is noted that permeable paving and swales are proposed within the drainage strategy; subject to appropriate design, these features are likely to make a positive contribution towards meeting the interception requirements of Standard 2.

***ACE Response***

*1. As the site experiences high groundwater levels and contamination, the detention basin will need to be lined and therefore will not be able to provide full interception. However, various SuDS elements are included within the surface water drainage strategy, as mentioned in Item 3 below.*

*2. The basins are dry detention basins. The FRA will be updated to state detention basin for clarity, as it is proposed for the basin to be dry between rainfall events.*

*3. As part of the surface water drainage strategy, permeable paving, tree pits and detention basins have been implemented and will be able to provide the site's interception. These features are shown on drawing 2505550_C-ACE-XX-XX-DR-C-0601 Proposed Drainage Strategy and are stated within the FRA.*

**Standard 3 (Management of Everyday Rainfall and Flooding):**

1. While the FRA and Drainage Strategy states that there is full containment of surface water runoff for storm events up to and including the 100-year plus 45% allowance climate change", the hydraulic model calculations demonstrate that there is some surface water flooding occurring in the 1 in 100 year plus climate change event. A more detailed exceedance plan for the 1% AEP event plus climate change is required. While Figure 6-1 is provided, the plan should include any areas/depths of flooding from the drainage network.

2. As stated in the National Standards for SuDS, we require evidence to explain why the greenfield rates cannot be achieved for this site.

***ACE Response***

*1. The volume of flooding at manholes S3, S4 and S16 for the 1 in 100yr + 45%CC storm event is 6.6m$^3$, 1.99m$^3$ and 3.78m$^3$ respectively, which would be contained within the highways. Depths and areas have been added to the drainage strategy plan at the location / manhole where flooding from the drainage modelling occurs.*

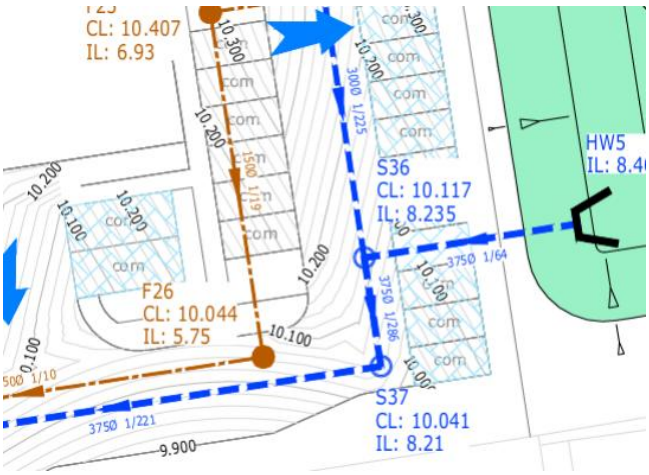
*2. If rates were restricted to Greenfield rates (Qbar), due to the site constraints, contamination present and the area available to use for attenuation, it would result in significant flooding on and off site.*

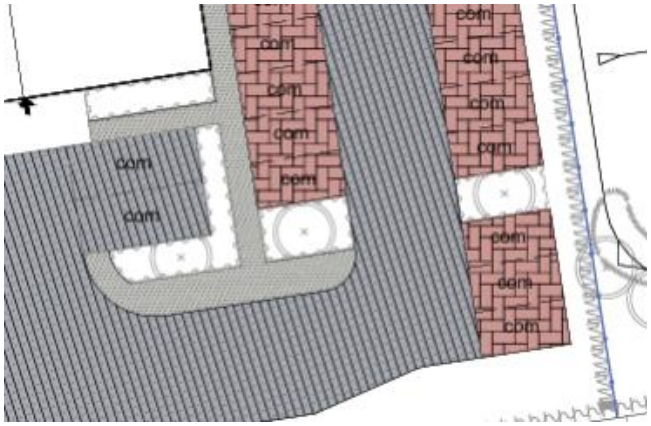
**Standard 5 (Amenity) and 6 (Biodiversity):**

1. As these matters fall outside of the LLFA remit/expertise, we would expect the Local Planning Authority to seek input from other consultees with specialisms in these areas.

2. It is noted that basin 2 will have a modelled maximum peak depth in the 1 in 100 year plus climate change event of 1.236m.

3. There appear to be conflicts between the hard landscaping drawings and the drainage strategy. For example, the drainage strategy indicates permeable paving (light blue hatching) adjacent to the industrial building; however, the corresponding area on the hard landscaping drawings is shown as concrete block paving/porous concrete block paving, although the colour distinction is unclear. To avoid ambiguity, all plans and drawings submitted under this application should be consistent and correspond with one another.



4. There also appears to be some conflicts between areas of permeable paving and Root Protection Areas. The Arboriculturist will be best placed to make comments regarding this matter.

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***ACE Response***

*1. Noted, no response needed*

*2. Noted, no response needed*

*3. The latest drainage strategy plan has been sent to the Landscape Architect to assist with coordination and permeable paving extents. See updated hard landscape proposals 7785_104-106 rev D, included within the appendices.*

*4. Noted. However, a lined permeable paving system would be treated similar to a non-permeable system, like standard asphalt. An arboricultural assessment is included in the planning documents which assesses trees that need to be protected; the trees that need to be removed and considers the impact on RPAs from drainage and other features, such as paving. They will advise on the impacts and the method statements used to deliver the proposed scheme, and will be consulted on by the local tree officer. From a SuDS perspective, if there was an unacceptable impact, the layout would adapt, as opposed to removing permeable paving and replacing with asphalt.*

From the above responses and additional information, hopefully this is enough to remove the holding objection and to resolve any areas of concern.

Kind regards,

**Josh Haddow**

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**Appendices**

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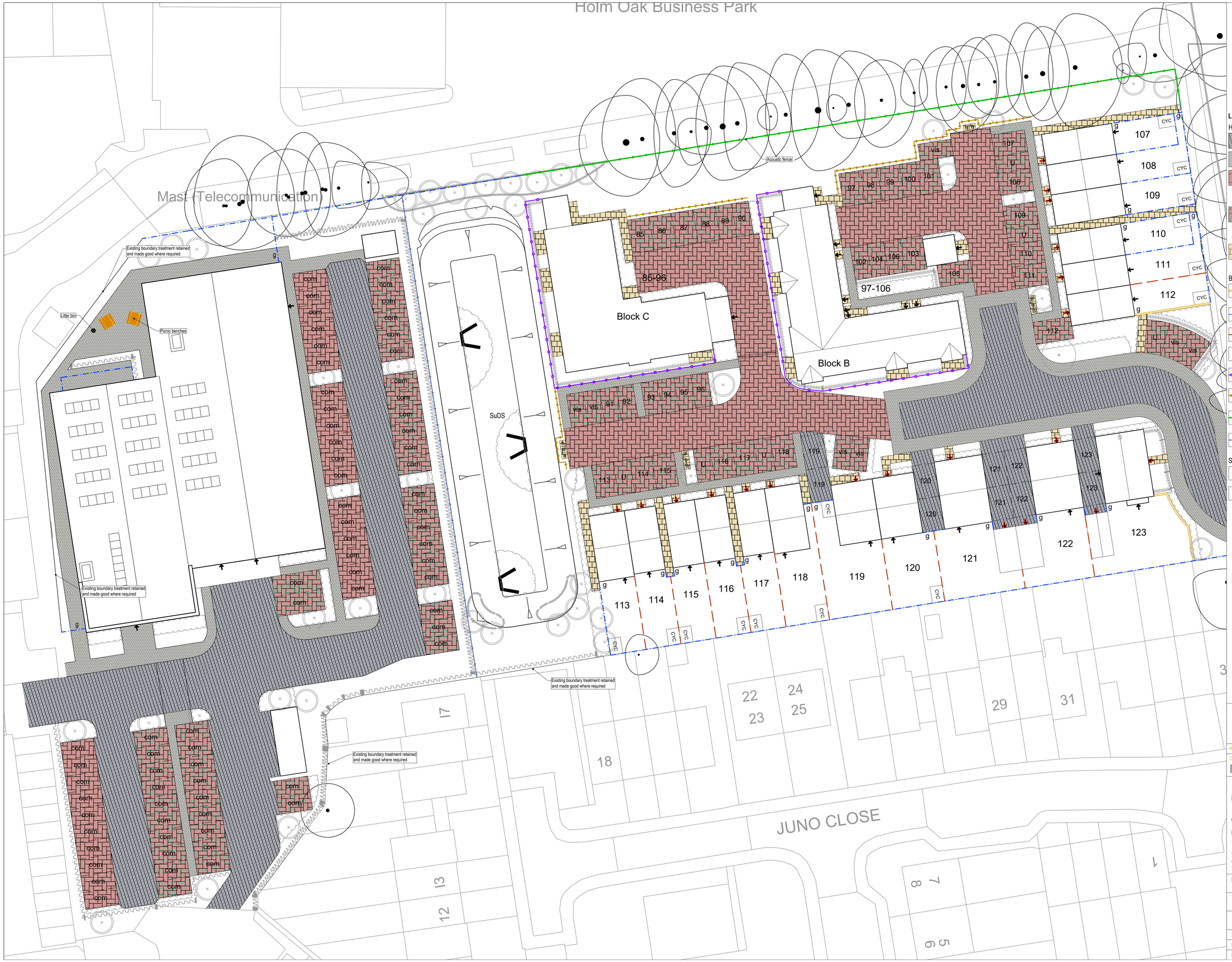


## LEGEND

### Hardworks

**BITUMINOUS MACADAM SURFACE -** to vehicular areas to engineers details.

**BITUMINOUS MACADAM SURFACE -** to footpath/cycleways to engineers specification.

**CONCRETE BLOCK PAVING**
Concrete block, 200 x 100 x 80mm, with smooth finish, chamfered, brindle colour, laid herringbone pattern, 200mm soldier course of Charcoal blocks to peripheral edge (where required)
e.g. 'Keyblok' block paving by Marshalls Ltd

**POROUS CONCRETE BLOCK PAVING**
Concrete block, 200 x 100 x 80mm, nibbed block, with smooth finish chamfered, brindle colour, laid herringbone pattern, 200mm soldier course of Charcoal blocks to peripheral edge (where required)
e.g. 'Priora' porous block paving by Marshalls Ltd

**CONCRETE PAVING SLABS** - to front paths
450 x 450 x 32mm thick, buff colour, riven finish, laid stack bond.
e.g. 'Pendle Riven Utility' concrete paving slabs by Marshalls Ltd

### Boundary Treatment

**BRICK WALL -**
1800mm high, 215mm wide brick wall, brick on edge coping, incorporating creasing tiles, brick type to match adjacent dwellings.

**CLOSE-BOARD FENCING -**
1800mm high close-boarded timber fence, treated softwood (min.15yr life span)

**GARDEN SEPARATION FENCING -**
Garden separation in accordance with developers specification.

**REAR ACCESS GATE -**
Treated softwood timber gate (min.15yrs life span), incorporating steel hinges and hook latch and padlock bar.

**BALL TOP RAILING -**
1100mm high steel vertical bar ball-top railing; galvanised and painted black

**KNEERAIL FENCING -**
400mm high timber kneerail, treated softwood beams, tongue and groove construction

**ACOUSTIC FENCING -**
3m high timber acoustic fence to engineers details

**MESH SECURITY FENCING -**
1.8m high, painted green, mesh security fencing to engineers details

### Street Furniture

**TIMBER PICNIC BENCH -**
'Cleveland' Hardwood timber picnic table by Woodscape Ltd. 800 x 1650mm table, 350mm wide integral bench.

**LITTER BIN -**
'Woodland' timber bin with lid by Streetmaster Ltd, 110L capacity, 25 x 90mm slats, treated softwood construction, galvanised liner, root fixed into concrete footing; or equal and approved.

| Rev | Date | By | Description |
|---|---|---|---|
| D | 14/10/26 | AC | Permeable paving updated to match Engineers' details |
| C | 23/04/26 | AC | Northern acoustic fence extended |
| B | 16/04/26 | AC | Amends inline with updated layout |
| A | 20/02/26 | AC | Amends inline with updated layout |

Drawing Status
**FOR PLANNING**


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| | |
|---|---|
| Project | NIB & SGN Land, Durrington |
| Title | Hard Landscape Proposals<br>Sheet 1 of 3 |
| Client | Bellway Homes South London |
| Scale | 1:250 @ A1 |
| Drawn | AC |
| Date | December 2025 |
| Checked | GC |
| Drawing No. | CSA/7785/101 |
| Rev | D |




N

0 5 10 metres

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| Title | Hard Landscape Proposals Sheet 2 of 3 |
| Client | Bellway Homes South London |
| Scale | 1:250 @ A1 |
| Drawn | AC |
| Date | December 2025 |
| Checked | GC |
| Drawing No. | CSA/7785/102 |
| Rev | D |




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| Date | December 2025 |
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| Drawing No. | CSA/7785/103 |
| Rev. | D |