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Lead Local Flood Authority

Hannah Kersley
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date 6th May 2026

Dear Hannah,

RE: AL/11/24/OUT – Land East of Westergate, Westergate (part of BEW allocated site)

Thank you for your consultation on the above site, received on 6th May 2026. We have reviewed the application as submitted and wish to make the following comments.

This is a hybrid application where the outline application is for all matters reserved except access for up to 400 dwellings and associated works and the full planning application is for alterations to site access of Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife.

Since our last comments in December 2024, the EA Flood Map for Planning and [National standards for sustainable drainage systems \(SuDS\)](#) (herein after called NSfS) have been updated. Consequently, following discussions with the LPA, we asked if the applicant could provide revised documents to ensure the application is assessed using documents that reflect current best practice and policy. For clarity, although some wording in the Drainage Addendum may imply otherwise, WSCC is the LLFA for West Sussex, and is therefore the statutory consultee for surface water drainage for major planning applications. However, we support the use of the ADC checklists and continue to recommend that applicants use them for Arun applications while the LLFA finalises our surface water guidance (this is very likely to be released before the reserved matters application).

We have therefore undertaken a review of the updated Drainage Strategy, which was updated based on the NSfS.

We have not been provided with the updated FRA, therefore we are unable to check whether the most up to date EA mapping is used for surface water flood risk assessment or whether there are any surface water flood risk implications on the proposed drainage strategy.

We have the following comments to make:

The application is not in accordance with NPPF paragraphs 181 and 182, PPG Flood risk and coastal change or Policy W SP1 Water, W DM2 Flood Risk and W DM3 Sustainable Urban Drainage Systems in Arun LP.

Standard 1 (Runoff destinations): Additional information required

1. Priority 1 (rainwater harvesting/re-use) does not appear to be mentioned in the documents provided, therefore there is no evidence that it has been considered. As West Sussex is seriously water stressed, rainwater harvesting shall be considered at outline stage. This therefore conflicts with the SuDS Hierarchy, and does not follow the SuDS approach. Standard 1 of the NSfS has therefore not been met.

We are aware that it is unlikely rainwater harvesting will most likely need to be proposed in conjunction with a lower priority final destination. Groundwater monitoring and infiltration testing has been provided which demonstrates that infiltration is not a feasible method of draining the site due to high groundwater levels (Priority 2). It is therefore proposed to discharge to an ordinary watercourse (Priority 3) at greenfield rates.

Standard 2 (Management of everyday rainfall (interception)): Not required for an outline application, as we can cover through recommended conditions, once the layout is being set at reserved matters.

We recommend considering the need for interception features at an early stage in the reserved matters process, as these can have a significant influence on site layout. For sites where infiltration is not viable, alternative interception features which rely on evapotranspiration instead often require additional land take. Addressing this early helps minimise redesigns of the site layout and avoid spatial conflicts at reserved matters stage.

Standard 3 (Management of extreme rainfall and flooding): Additional information required

1. We require a drawing demonstrating that the surface water drainage features are not in areas at risk of flooding in 1% AEP fluvial or pluvial events. This could alter the parameter plan, therefore is required at outline stage. Up to date modelling shall be used (either EA or site specific).
2. As mentioned in the April 2026 email, the NSfS state that the urban creep allowance shall be 10% for residential developments (except for flats/apartments). The LASOO guidance has been superseded by the NSfS.
3. The calculations in Appendix B do not appear to have been updated, as they are from 2023. The Quick Storage Estimates (or similar) are required (full outputs).
4. To reflect the NSfS, we request an updated catchment plan detailing the contributing areas that could potentially drain into the proposed surface water drainage system, and corresponding discharge rate (following the 3.8 l/s/ha greenfield rate).

We have some concerns regarding the feasibility of providing the additional storage volume required for a design flood event (1 in 100 plus climate change event).

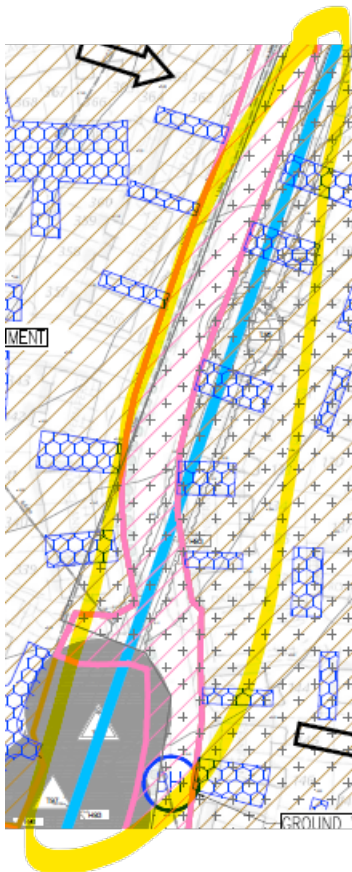
Standard 4 (Water quality), Standard 5 (Amenity) and Standard 6 (Biodiversity): Not required for an outline application, as we can cover through recommended conditions, once the layout is being set at reserved matters.

We would suggest that early consideration of these at reserved matters stage will ensure the SuDS approach is used more effectively across the site. Each of them can alter the layout and scale of development.

Standard 7 (Construction, Operation, Maintenance, Decommissioning and Structural integrity): Not required for an outline application, as we can cover through recommended conditions, once the layout is being set at reserved matters.

Early consideration of maintenance easement and any landscaping proposals (tree planting) is suggested, to avoid clashes at reserved matters.

Other comments:



All ordinary watercourses within the site shall be retained. It is not appropriate to infill watercourses for residential developments. This would require Ordinary Watercourse Consent, as it would obstruct the flow within the watercourse. See an example on the left-hand side.

It is essential that any proposed ground raising (in a large section of the eastern side of the site) does not increase surface water flood risk elsewhere.

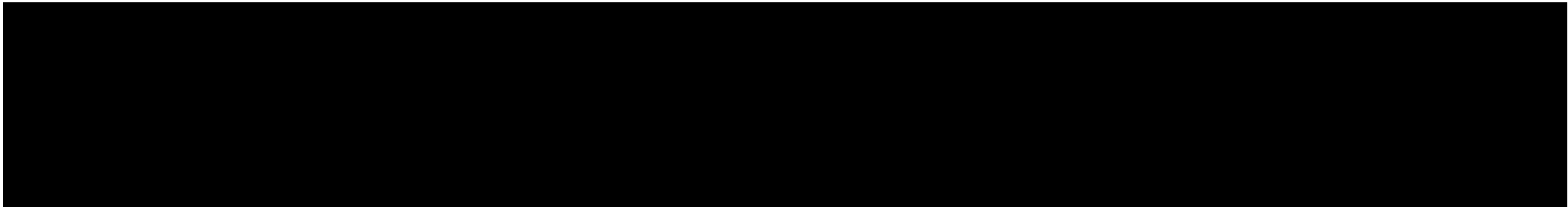
We will review this objection when the issues highlighted above are adequately addressed and we are formally reconsulted. When preparing any further documents to address the above comments, we recommend clearly highlighting where amendments have been made.

We would not recommend drainage related conditions yet for this outline application.

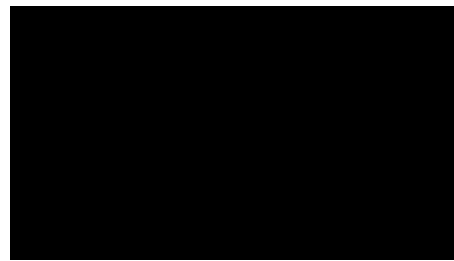
If required/useful for reserved matters, we have a pre-application advice service: [Flood Risk Management: Pre-application advice - West Sussex County Council](#) (**Please note:** this can only be used before a planning application is submitted to the LPA)

Yours sincerely,

Eleanor Read
Flood Risk Management Team



PL- Consultation- WSCC drainage response



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Our priorities...



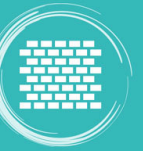
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Delivering the right homes in the right places



Supporting our environment to support us



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Our core foundations




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Sent: 07 May 2026 17:10
To: Planning.Responses <Planning.Responses@arun.gov.uk>
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Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to [Redacted] but the responding officer can be contacted directly via email if there are any questions relating to this response.

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