

Miss K Welch
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

**Lead Local Flood Authority
Ground Floor
Northleigh
County Hall
Chichester
West Sussex
PO19 1RH**

Date 08 August 2026

Dear Katherine,

LU/162/26/DOC – BCMY, 1 Fort Road, Wick, Littlehampton, BN17 7QU

Approval of details reserved by condition under LU/209/25/S73 relating to conditions 9- Groundwater Monitoring, 10- Surface Water Drainage, 11- Maintenance and Management of Sustainable Drainage Scheme, 12- Surface Water Management and 13- Surface Water Drainage.

Thank you for your consultation on the above site. The LLFA wish to make the following comments below:

Technical Observations

No dedicated exceedance plan, overland flow routing drawing, hazard assessment, building threshold analysis, or evidence demonstrating that exceedance flows would remain away from buildings has been provided. The LLFA therefore seek further information to demonstrate compliance with National SuDS Standards relating to exceedance event management and property protection.

Groundwater

The design places the tank system at a base level of approximately 2.325m AOD, with the highest recorded groundwater level reported as 2.247m AOD. The limited groundwater clearance is not compliant in respect of the 1m buffer (Cond9). Further clarification may be sought regarding groundwater interaction, buoyancy considerations, liner durability, and long-term maintenance arrangements.

Key Areas that may benefit from Further Clarification

1. Exceedance Management – Further evidence may be required to demonstrate how exceedance flows would be safely managed across the site.
2. Flood Risk to Third Parties – Additional information may be required to demonstrate that flood risk would not be increased elsewhere.

3. Maintenance Strategy – Maintenance responsibilities and long-term arrangements are referenced but may benefit from further supporting detail.
4. National SuDS Standards Compliance – Compliance appears to be broadly addressed at this stage, although some elements may require further evidence to fully demonstrate conformity.
5. NPPF Compliance – The strategy appears capable of meeting policy objectives; however, further clarification may be required to demonstrate full compliance.
6. Timing of application/matters effectively approved – much of the above could have been addressed at Outline/Full which does limit the options
7. Level of design and Plan status – It would not be acceptable to have these areas in draft or preliminary and the layout or plan must be fixed at DoC stage.

On balance the LLFA would **not currently recommend** discharge of Conditions 9, 10, 11, 12 and 13 sufficient information is provided to adequately address our concerns. The strategy broadly follows the SuDS hierarchy and demonstrates a viable drainage concept, but there are several issues that potentially attract scrutiny and may prevent full compliance with the National SuDS Standards and NPPF requirements.

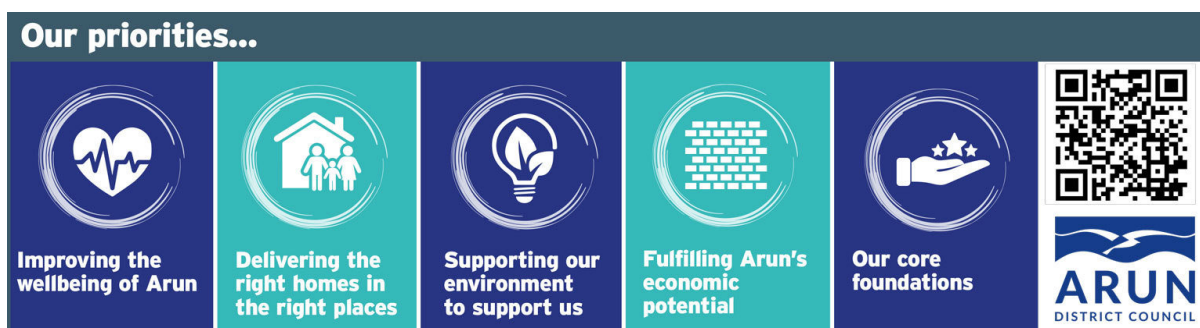
Yours sincerely,

Mat Jackson
Flood Risk Management Team



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Sent: 07 August 2026 08:38
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Please could the attached response be distributed to the relevant case officer, Katherine Welch

Regards

Mat Jackson

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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