

Project No:	16785-02	Project Name:	Land to West of New Courtwick Lane, Wick, BN17 7RZ
Subject:	Response to LLFA comments of 17.12. 2025 (ref: LU/72/25/OUT)	Revision:	P02
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1.0 INTRODUCTION

HOP Consulting Ltd (HOP) has been engaged to provide a response to Lead Local Flood Authority (LLFA) comments in relation to the hybrid outline and full planning application submission for the development at New Courtwick Lane. This Technical Note specifically addresses item 1 of correspondence dated 17.12.2025 received from the LLFA's Mat Jackson.

As provided in correspondence from HOP dated 19.12.2025, additional details have been submitted subsequent to the LLFA response of 17.12.2025, relating to soakage testing and groundwater monitoring that has been undertaken at the site. We trust that additional consultation comments are in hand, in direct response to the site investigation works' findings and their implications for the drainage strategy across the Phase I and Phase II elements of the development.

The correspondence received from the LLFA includes the following request:

To help with overcoming our objection we recommend the following:

Item 1: *a brief note demonstrating how application meets the current SuDS principles (June 2025) to assess against any preliminary results as necessary.*

The following section provides a brief assessment relating to the eleven principles in the National Standards for Sustainable Drainage Systems (NSSuDS). These are dated as being updated on 30 July 2025, having been originally published on 19 June 2025.

2.0 SUDS PRINCIPLES AND DEVELOPMENT PROPOSALS

Principle 1 – Natural approach to managing water

The proposed development adopts a natural approach to surface water management through the management of rainfall at source with infiltration to ground. Surface water is retained and treated within the site through shallow, near-surface SuDS features rather than being rapidly conveyed off site via traditional piped drainage.

This approach mimics the site's natural drainage characteristics and also the brownfield drainage arrangement, where all surface water runoff from the existing roof and external hardstanding areas is currently directed to soakaways.

The SuDS proposals minimise runoff volumes and peak flows and avoids placing additional load on the surrounding drainage networks or downstream watercourse receptors.

Principle 2 – Use of SuDS management trains

The drainage strategy incorporates a SuDS management train, with runoff intercepted at source, conveyed through permeable surfaces, attenuated where necessary and ultimately infiltrated to ground. The use of a permeable sub-base within infiltration blanket systems beneath hardstanding areas allows for the staged control of runoff volumes and flow rates while also delivering water quality benefits through filtration.

Principle 3 – The SuDS Approach

The overall drainage design reflects the SuDS approach as defined in the NSSuDS. It manages surface water flooding for the lifetime of the development, incorporates the higher end allowances for climate change, it is considered to improve runoff quality and integrates drainage infrastructure within the site layout. The system prioritises near surface-based systems where practicable and is designed to be maintainable over the lifetime of the development. The proposed infiltration SuDS scheme is also considered to provide wider environmental benefits by managing runoff sustainably at source.

Principle 4 – Early and integrated design

Surface water management has informed the site design from an early stage and has been developed alongside the site layout, proposed finished levels and the phasing strategy. The drainage proposals take into account the site's topography, geology and hydrology which has been established through detailed infiltration testing and groundwater monitoring. The strategy has been coordinated with the proposed building layout, access, landscaping and climate resilience considerations.

Principle 5 – Informing site layout and multifunctional land use

The layout of the development integrates with the drainage infrastructure to ensure that all areas of the site are effectively served by SuDS. Hardstanding and car parking areas have been used to accommodate permeable surfaces and infiltration features, allowing land to serve multiple functions including drainage, access and parking. This approach is considered holistically across the commercial nature of the development's environment while maintaining runoff treatment prior to infiltration.

Principle 6 – Natural conveyance and exceedance routing

Surface water conveyance follows the topography of the developed site, with exceedance flows directed along overland pathways away from buildings and vulnerable areas. Finished ground levels and external surfacing are designed to safely route flows to landscaped or infiltration areas during extreme events, reducing risk to people and property. The drainage design has been developed in coordination with engineering, landscape and urban design considerations.

Principle 7 – Consistency with flood risk policy and strategy

The drainage strategy has been prepared with regard to the NPPF, the local development plan, the local SFRA and the relevant SuDS guidance. The design also reflects Environment Agency mapping, groundwater vulnerability data and the requirements of the LLFA and Adur's drainage officer.

Principle 8 – Early engagement with the LLFA and the Arun Drainage Officer

Early and ongoing engagement has been undertaken with the LLFA and the Arun Drainage Officer. Consultation responses have directly informed the evolution of the drainage strategy, including further ground investigation, revised calculations and

refinement of the SuDS approach.

Principle 9 – Demonstrating compliance from the conceptual stage

Compliance with the National SuDS Standards has been demonstrated from the conceptual stage of the planning process. The FRADS and subsequent technical responses show how the SuDS approach is embedded throughout the development and forms a fundamental component of the site's infrastructure.

Principle 10 – Demonstration of standards within site design

Detailed correspondence from HOP to the LLFA and the Arun Drainage Officer has continued since the original submission of the original FRADS report for Planning. A summary of the correspondence, available on the on the Arun DC planning portal, is as follows;

Additional Docs	30-07-25	Drainage\16785-02 - HOP Planning Responses Appendices A-C (Part 1)
Additional Docs	30-07-25	Drainage\16785-02 - HOP Planning Responses Appendices C(cont) - D (Part 2)
Additional Docs	30-07-25	Drainage - Arun Response Comments 16782-2 HOP (dated 29.7.25)
Additional Docs	30-07-25	Drainage - LLFA Response Comments 16782-2 HOP (dated 27.7.25)
Additional Docs	24-10-25	SUDS TESTING PLAN PHASE REV P1
Additional Docs	24-10-25	HOP response with SuDs Testing Oct 20
Additional Docs	12-01-26	HOP Winter testing results FINAL (WITH APPS) comp Dec 2025

The details in this correspondence demonstrate how the NSSuDS are met within the site design, including management of the 1 in 100 year rainfall event plus climate change, conservative runoff assumptions, adequate storage provision, safe exceedance routing and protection of groundwater through appropriate freeboard to the water table.

Principle 11 – Phased development

The development is proposed to be delivered in phases and the surface water drainage strategy ensures that each phase will operate independently and in compliance with the NSSuDS. The effects of each phase on surface water runoff have been considered to ensure that flood risk is mitigated at all stages of build-out and anticipated occupation of the site in its entirety as well as considering the benefits of a phased SuDS strategy in the development's initial form.

3.0 SUMMARY

The proposed drainage strategy for the New Courtwick Lane development demonstrates that the principles of the NSSuDS are met by adopting a natural, infiltration-based SuDS approach to managing surface water runoff at source. SuDS features are integrated within the site layout to mimic natural drainage, control runoff rates and volumes, provide water quality benefits and safely manage exceedance flows.

The infiltration SuDS that are proposed for the site also align with the existing brownfield surface water drainage arrangement at the site, where all surface water runoff is currently directed to soakaways within the site curtilage. Historically, surface water management has been through infiltration to ground through both natural and engineered means.

Each phase of development is proposed to continue the use of infiltration SuDS to ensure that there is no adverse effect in terms of flood risk at the site or to neighbouring properties. This is considered to be achieved for the lifetime of the development through the implementation of a policy-compliant SuDS solution.

The design has been informed by engagement with the LLFA and the Arun Drainage Officer, and relevant national and local flood risk policy and incorporates appropriate allowances for climate change. Groundwater monitoring at the site is ongoing though the winter months and infiltration testing was completed in December 2025. Information from these investigative works indicates that infiltration SuDS, as proposed, are a viable solution to the management of surface water at the site.

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