

## Engineers Comments Regarding Surface Water Drainage

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| <b>Application Reference:</b>   | <b>LU/72/25/OUT (1)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Emma Sheppard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Date of Review:</b>     | 30/06/2026  |
| <b>Site Name:</b>               | Land to the West of New Courtwick Lane Wick BN17 7RZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |             |
| <b>Application Description:</b> | Hybrid Planning Application comprising of the following: 1) - <b>Outline application with all matters reserved (except access) for Phase 2</b> (West of Site) comprising development of approximately 8,800sqm GIA Light Industrial/Storage and Distribution (Use Class E(g)(iii) / B8), and 2) - Full Application for Phase 1 (East of the Site) for a food store (Use Class E(a)), 2 No. Drive-Thru food/beverage units (Sui Generis) with revised vehicular access, associated parking and landscaping. This application may affect the setting of a listed building and is in CIL Zone 2 and is CIL Liable. |                            |             |
| <b>Assessment Number:</b>       | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                            |             |

### Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance (including design checklists) - <https://www.arun.gov.uk/surfacewater>

Land Drainage Consent – <https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/>

Arun District Council Land Drainage Byelaws - <https://www.arun.gov.uk/byelaws/>

Arun District Council surface water pre-commencement conditions - <https://www.arun.gov.uk/planning-pre-commencement-conditions>

The National Standards for SuDS - <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

The SuDS Manual [C753] by CIRIA

| Response | Objection |
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### References

The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development.

The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.

This consultation has been primarily informed by the NSfS and The SuDS Manual.

## Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our OUTLINE surface water drainage design checklist (linked above). A failure to address these will result in an **objection** to any OUTLINE planning application.

Where the quantum of development is not being approved, an objection to an outline application is only made where:

- a viable runoff disposal location has not been evidenced,
- flood risk may be impacted by the proposal,
- surface water drainage may impact the proposed development scale and layout, or;
- a significant impact upon existing watercourses or natural drainage features is identified

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

| Standard                                                                          | Assessment                           | Response                                  |
|-----------------------------------------------------------------------------------|--------------------------------------|-------------------------------------------|
| 1. Runoff destination                                                             | Insufficient                         | <b>Objection</b>                          |
| 2. Interception drainage                                                          | Not applicable (OUTLINE application) | <b>No objection subject to conditions</b> |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient                         | <b>Objection</b>                          |
| 4. Water Quality                                                                  | Not applicable (OUTLINE application) | <b>No objection subject to conditions</b> |
| 5. Amenity                                                                        | Not applicable (OUTLINE application) | <b>No objection subject to conditions</b> |
| 6. Biodiversity                                                                   | Not applicable (OUTLINE application) | <b>No objection subject to conditions</b> |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Not applicable (OUTLINE application) | <b>No objection subject to conditions</b> |

## Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Existing Topographical Survey 23029-02-T-E Sheet 1 of 1
- Illustrative Landscape Strategy Plan CSA/6408/201 Rev C
- Existing Site Survey Plan 2255-P-004 A
- FRA And Drainage Strategy, reference 16785/HOP/RPT/01, revision P2, dated 11/03/2025.
- Drainage - Arun Response Comments 16782-2 HOP (dated 29.7.25)
- Drainage - LLFA Response Comments 16782-2 HOP (dated 27.7.25)
- Drainage\16785-02 - HOP Planning Responses Appendices A-C (Part 1)
- Drainage\16785-02 - HOP Planning Responses Appendices C(cont) - D (Part 2)

- HOP Letter dated 2 December 2025, reference AK/SMB/16785-02
- HOP Letter Report dated 23 December 2025, reference AK/SMB/16785-02
- ECE email response dated 23 December 2025
- HOP Winter testing results FINAL (WITH APPS) comp Dec 2025
- West Sussex Surface Water response 19 January 2026
- HOP Technical Note re SuDs principles AK/SMB/16785-02 dated 22 January 2026
- EMAIL 6.3.26 re drainage consultation
- EMAIL 30.4.26 drainage subplans-
- Drawing Issue Sheet Rev D
- 2255-P-010E PROPOSED SITE PLAN\_PHASE 1
- 2255-P-011E PROPOSED SITE PLAN\_PHASE 2
- Supplementary advice on retail, leisure and town centre planning policy February 2026
- HOP letter report AK/SMB/16785-02 dated 2 April 2026
- WSCC LLFA Drainage response 22 May 2026**
- FRA & Drainage Strategy June 2026**
- Supplementary Advice No.2 - Norway Lane & Cumulative Impact FINALv3.1**

#### Consultation comments to the planning officer

##### 0. General

- 0.1. This consultation relates to Phase 2, the outline application only. For comments relating to Phase 1 please see the linked separate consultation of even date.
- 0.2. We note the LLFA response dated 22 May 2026 which objects to the previous submission information. They will need to be re-consulted on the latest submission documents.
- 0.3. We have reviewed the Flood Risk and Drainage Strategy [FRADS] report dated 17/06/2026. No new ground investigation or infiltration testing is presented in the report.
- 0.4. The current evidence base includes infiltration testing on Phase 1 (Full application) which confirms infiltration is viable during winter in the shallow river terrace deposits at depths of approximately 1.2m bgl. It is not clear why testing has been restricted to only Phase 1 and no additional testing has been provided for Phase 2 given the failure of the 2023 testing to achieve viable infiltration. There is also not been possible to demonstrate the southern part of Phase 1 can drain via infiltration and the current design restricts infiltration to the northern part of Phase 1 only. There is clearly variation of infiltration potential across the wider application site.
- 0.5. Groundwater levels on Phase 1 have been found to be higher than previously anticipated and demonstrated that the previous design of the Phase 1 infiltration features to not meet the standards within the NSfS. Ground raising or revised layout design would be required at Phase 1 to achieve a compliant design. The peak groundwater level has not been established by the groundwater monitoring at Phase 1 due to a gap in the data between 17<sup>th</sup> February and 16<sup>th</sup> March when groundwater levels may have been highest. An acceptable design high groundwater level has not yet been agreed. The current infiltration design for Phase 1 does meet the standards within NSfS.
- 0.6. The ground conditions in respect of both infiltration and groundwater levels have not been evidenced for Phase 2 by the current information. The inability to evidence that an infiltration is achievable for Phase 1 together with the lack of evidence for Phase 2 leads us to reject the proposed infiltration strategy for Phase 2.

0.7. The FRADS report includes an alternative solution of piped outflow to a watercourse which is supported by calculations but does not establish the legal feasibility of connection and discharge to the watercourse.

0.8. **No positive infiltration testing for the outline parcel has been submitted for assessment.** The previous testing returned negative results. The latest information only relates to Phase 1 – the full planning application. Therefore, the objection is unchanged, and we have no further comment relating to this element of the application.

## 1. Runoff destination

- 1.1. The applicant proposes to discharge surface water into the ground via infiltration. Water reuse is not proposed but should be, in accordance with the hierarchy for sustainable drainage as there is a significant contributing catchment and the potential demand for non-potable water, there may also be a need for landscape irrigation.
- 1.2. Even if water reuse is proposed, this is unlikely to provide a full surface water solution. Therefore, progression through the hierarchy is inevitable. The use of infiltration as the next highest priority disposal method is supported. However, in the outline development site there is no site-specific evidence to demonstrate that infiltration is viable.
- 1.3. Where infiltration is the only disposal option available or suggested, it is expected that the applicant demonstrates that the strategy is achievable. This would be supported with ground investigations (groundwater monitoring and infiltration testing) which inform the design. Such site investigations have not been completed or submitted for this part of the site. (Please refer to attached comments regarding the ground investigations for the phase 1). An alternative method of disposal must be demonstrated to be viable.
- 1.4. The FRADS presents an alternative drainage strategy of restricted piped discharge via new offsite sewer and outfall to an existing offsite watercourse. The new headwall shown may be on private land and permission would need to be evidenced for the physical works and discharge of the flows. Discharge to a watercourse should only be proposed as a method of disposal if discharge to ground is not viable. A viable method of disposal of surface water should be established as part of the outline planning consent and cannot be deferred until reserved matters or discharge of conditions stage.
- 1.5. As no viable alternative runoff destination has been demonstrated, and the proposed destination is inadequately substantiated, **I object in principle to the application.** If planning permission is granted for this application and it is later found that infiltration is not viable, then it is not currently proven how the site will drain surface water. This could lead to an increase in flood risk on site or elsewhere.

## 2. Interception drainage

- 2.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, it is not a reason for objection and can be assessed when an application for reserved matters is made.
- 2.2. Consideration of interception drainage is critical to the conceptual design of the site in determining the scale and layout of the development. Interception drainage ensures that rainfall from regular rainfall events does not leave the site. This replicates greenfield conditions and goes hand in hand with the management of extreme rainfall events to ensure that development does not increase flood risk.

- 2.3. Where infiltration has not been proven to be viable (as here) and there is a risk that interception drainage may only be delivered by evapotranspiration this can have significant impact on the scale and layout of the proposed development.
  - 2.4. The 'alternative scheme' included in the FRADS does not include a design and assessment for interception drainage and it does not appear that the illustrative layout currently allows for surface features which would provide interception drainage.
3. Extreme rainfall and flooding
- 3.1. The proposed runoff destination is not adequately demonstrated with supporting site investigations. In these instances, it is expected that an alternative means of draining surface water from the site is submitted. All alternative methods would involve some form of restricted discharge to another location. The restriction of surface water generates the need for storage. The volume of storage that is needed is dictated by the discharge rate and volume.
  - 3.2. It is therefore expected that a per/hectare discharge rate is submitted for approval at outline stage (where infiltration has not been proven to be viable). Greenfield runoff rates and suggested proposed discharge rates have not been submitted for assessment.
  - 3.3. The alternative drainage strategy provided in the FRADS is not supported by greenfield runoff calculations. The drained areas and hydraulic calculations together with the hydraulic fall to the proposed outfall appears to be feasible and there is available space within the proposed quantum of development and site constraints to achieve attenuation storage owing to the large car parking areas available. However, the legal ability to discharge to the watercourse has not been established and this is necessary to demonstrate the feasibility of the piped solution.

Copied from objection dated 1 December 2025:

4. Water quality
- 4.1. This standard cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, it is not a reason for objection and can be fully assessed when an application for reserved matters is made.
  - 4.2. The later submitted water quality and proposed treatment assessment must assess each sub-catchment and their treatment methods where different parts of the site receive different treatment regimes. The designer should aim to treat all rainwater as close to source as possible. **Open features which aid water treatment can impact the scale and layout.**
5. Amenity, Biodiversity, Construction and Maintenance
- 5.1. These standards cannot be fully assessed when the scale and layout of the development is not being submitted for approval. Therefore, they are not a reason for objection and can be assessed when an application for reserved matters is made.
  - 5.2. Each of these standards can impact the scale and layout of the proposed development and the applicant and design team are encouraged to familiarise themselves with our guidance and checklists to avoid objection when a reserved matters application is made.
  - 5.3. The introduction of the NSfS imposes stronger requirements for amenity and biodiversity than those suggested by The SuDS Manual which has design criteria rather than standards. The SuDS Manual does not ignore the sentiment or goals of those standards.

## 6. Suggested conditions / Overcoming the objection

6.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.

**6.2. The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**

6.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

## Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☐ Landscaping officer (proposed trees and landscaping)
- ☐ Tree officer (existing trees)
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☒ **Lead local flood authority (all other sources of flooding and ordinary watercourses)**
- ☐ Other: Specify .....
- ☐ None

## Engineers Comments Regarding Surface Water Drainage

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|---------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------|
| <b>Application Reference:</b>   | <b>LU/72/25/OUT (2)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <b>Reviewer Reference:</b> | ADC/EXT5/AF |
| <b>Planning Officer:</b>        | Emma Sheppard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <b>Date of Review:</b>     | 30/06/2026  |
| <b>Site Name:</b>               | Land to the West of New Courtwick Lane Wick BN17 7RZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                            |             |
| <b>Application Description:</b> | Hybrid Planning Application comprising of the following: 1) - Outline application with all matters reserved (except access) for Phase 2 (West of Site) comprising development of approximately 8,800sqm GIA Light Industrial/Storage and Distribution (Use Class E(g)(iii) / B8), and 2) - <b>Full Application for Phase 1 (East of the Site) for a food store (Use Class E(a)), 2 No. Drive-Thru food/beverage units (Sui Generis) with revised vehicular access, associated parking and landscaping.</b> This application may affect the setting of a listed building and is in CIL Zone 2 and is CIL Liable. |                            |             |
| <b>Assessment Number:</b>       | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                            |             |

| Policy and Guidance Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  |
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| <p>Arun District Council Surface Water Drainage Guidance (including design checklists) - <a href="https://www.arun.gov.uk/surfacewater">https://www.arun.gov.uk/surfacewater</a></p> <p>Land Drainage Consent – <a href="https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/">https://www.westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/ordinary-watercourse-land-drainage-consent/</a></p> <p>Arun District Council Land Drainage Byelaws - <a href="https://www.arun.gov.uk/byelaws/">https://www.arun.gov.uk/byelaws/</a></p> <p>Arun District Council surface water pre-commencement conditions - <a href="https://www.arun.gov.uk/planning-pre-commencement-conditions">https://www.arun.gov.uk/planning-pre-commencement-conditions</a></p> <p>The National Standards for SuDS - <a href="https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds">https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds</a></p> <p>The SuDs Manual [C753] by CIRIA</p> |  |

| Response | Objection |
|----------|-----------|
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| References                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <p>The NPPF states that when determining any planning application, local planning authorities should ensure that flood risk is not increased elsewhere (paragraph 181, 182 and 187e). The PPG guides local planning authorities to refer to 'Sustainable drainage systems: non-statutory technical standards' [NsTS] and detailed industry guidance like The SuDS Manual [C753] by CIRIA to guide decisions about the design, maintenance, and operation of sustainable drainage systems for non-major development.</p> <p>The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.</p> <p>This consultation has been primarily informed by the NSfS and The SuDS Manual.</p> |

## Summary

This summary highlights if critical items aligning with each of the standards have been met. Critical items are highlighted in **bold** on our surface water drainage design checklist (linked above). A failure to address these will likely result in an **objection** to an objection to a full or reserved matters planning application.

If any of these items are inadequately addressed by the submission, then their correction may result in a redesign of the surface water drainage scheme. A redesign is likely to have site wide implications such as the potential for storage structures to increase in volume or plan area, or the provision of other important infrastructure to satisfy the NSfS set out below.

A full written explanation of the assessment and response is given in the consultation comments to the planning officer.

| Standard                                                                          | Assessment                              | Response                                                                      |
|-----------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------------|
| 1. Runoff destination                                                             | Insufficient                            | <b>Objection</b>                                                              |
| 2. Interception drainage                                                          | Insufficient – disposal method unproven | <b>Objection</b>                                                              |
| 3. Extreme Rainfall and Flooding                                                  | Insufficient                            | <b>Objection</b>                                                              |
| 4. Water Quality                                                                  | Insufficient                            | <b>Further Information</b>                                                    |
| 5. Amenity                                                                        | Insufficient                            | <b>Objection</b>                                                              |
| 6. Biodiversity                                                                   | Insufficient                            | <b>Objection</b>                                                              |
| 7. Construction, operation, maintenance, decommissioning and structural integrity | Insufficient                            | <b>No objection subject to conditions and landscaping not being approved.</b> |

## Reviewed Plans

The following documents have been submitted and reviewed to inform this consultation with reference to surface water drainage:

- Existing Topographical Survey 23029-02-T-E Sheet 1 of 1
- Illustrative Landscape Strategy Plan CSA/6408/201 Rev C
- Existing Site Survey Plan 2255-P-004 A
- FRA And Drainage Strategy, reference 16785/HOP/RPT/01, revision P2, dated 11/03/2025.
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- Drainage - LLFA Response Comments 16782-2 HOP (dated 27.7.25)
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- Drainage\16785-02 - HOP Planning Responses Appendices C(cont) - D (Part 2)
- HOP Letter dated 2 December 2025, reference AK/SMB/16785-02
- HOP Letter Report dated 23 December 2025, reference AK/SMB/16785-02
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- 2255-P-010E PROPOSED SITE PLAN\_PHASE 1
- 2255-P-011E PROPOSED SITE PLAN\_PHASE 2
- Supplementary advice on retail, leisure and town centre planning policy February 2026
- HOP letter report AK/SMB/16785-02 dated 2 April 2026
- WSCC LLFA Drainage response 22 May 2026**
- FRA & Drainage Strategy June 2026**
- Supplementary Advice No.2 - Norway Lane & Cumulative Impact FINALv3.1**

## Consultation comments to the planning officer

### 0. General

- 0.1. This consultation relates to Phase 1, the full application only. For comments relating to Phase 2 please see the linked separate consultation.
- 0.2. We note the LLFA response dated 22 May which objects to the pervious submission information. They will need to be re-consulted on the latest submission documents.
- 0.3. We have reviewed the Flood Risk and Drainage Strategy [FRADS] report dated 17/06/2026. No new ground investigation or infiltration testing is presented in the report.
- 0.4. Currently, the design is not sufficiently robust in terms of design high groundwater level to be able to support on a precautionary principle. The ground investigation has failed to provide monitoring between 17<sup>th</sup> February and 16<sup>th</sup> March when groundwater levels may have been highest and no precautionary buffer has been included. The June 26 FRADS includes rainfall data which shows that February 2026 has lower rainfall than January 2026 and suggests that the groundwater levels sloped off during the gap in data without a new peak level. Comparison with Lewes is not directly applicable as it has different groundwater flow and recharge characteristics. There should be a precautionary buffer to allow for the unknown groundwater depth. In addition the current design only provides 900mm and not the full one metre vertical distance.
- 0.5. The calculations indicate the system may flood onto New Courtwick Land and the soakaway factor of safety would also need to be increased. The current design may therefore not be feasible.
- 0.6. The proposed alternative drainage solution is now supported by hydraulic calculations but the greenfield runoff calculation is not included in the FRADS and the alternative strategy does not establish the legal feasibility of connection to the watercourse.
- 0.7. There must be a compliant and viable drainage design for the full planning application, it is not possible to apply conditions on an 'either or' basis as the change in drainage strategy affects other design parameter and compliance with other SuDS Standards.

### 1. Runoff destination

- 1.1. The applicant proposes to discharge surface water into the ground via infiltration. Water reuse is not proposed but should be, in accordance with the NSfS priorities for sustainable drainage as there is a significant contributing catchment and the potential demand for non-potable water, there may also be a need for landscape irrigation. To date no assessment of potential for water reuse or design for rainwater harvesting has been provided. The FRADS refers to assertions by the Planning Consultant that irrigation demand is not 'material' and that the inclusion would be inefficient. This dismissal of priority 1 of NSfS is not evidence that rainwater reuse should be discounted.
- 1.2. Even if water reuse is proposed, this is unlikely to provide a full surface water solution. Therefore, progression through the hierarchy is inevitable. The use of infiltration as the next highest priority disposal method is supported. However, the submitted ground investigations for the full application site are inadequate to demonstrate that the current infiltration design is achievable.

- 1.3. The latest information includes infiltration testing on Phase 1 (Full application) which confirms infiltration is viable during winter in the shallow river terrace deposits at depths of approximately 1.2m bgl. This is acceptable to demonstrate that infiltration is viable for Phase 1 at the approximate depth and location of the proposed infiltration devices. Further testing would be required prior to construction at the location and depth of the soakaway.
- 1.4. Ground water monitoring is provided for winter/spring 2025/26. There is no data between 17<sup>th</sup> February and 16<sup>th</sup> March and due to this failure the dataset does not comply with the ADC requirements for ground investigation to support full planning applications. Groundwater levels may have risen further above this between 17<sup>th</sup> February and 16<sup>th</sup> March. The peak may be higher than the data recorded and the base of the proposed infiltration features may be less than the 1m offset required by the NSfS. The design would need to allow an additional margin for this on a precautionary basis. This is not currently incorporated into the design.
- 1.5. The current design high ground water level is 2.383m AOD. The current base of infiltration device on the drainage layout and in the calculations is 3.283m AOD. There is therefore an offset of only 0.9m without any precautionary buffer. This is not in accordance with NSfS paragraph 1.15.
- 1.6. The current proposal to lift the building levels and surrounding external ground levels to retain the same effective depth of infiltration blanket but lift the base and introduce an engineered fill in the 333mm difference is not suitable for two reasons; 1) the design does not maintain 1m between and infiltration feature and design high groundwater level and there is no precautionary margin incorporated and 2) the stone fill will not replicate the same function as the subsoil and would need to be a high pollutant retentive soil. It may be possible to introduce a layer of high pollutant retentive fill material but since the design is dependant upon this aspect, the design should be progressed prior to planning consent being granted to ensure feasibility.
- 1.7. Infiltration is a higher NSfS Standard 1 priority than discharge to a watercourse or sewer. We would support further carefully considered ground raising to enable infiltration. The drainage design drawings and calculations currently have not been revised to suit the proposed increase in ground levels. The design should be updated to suit a revised design high groundwater level.
- 1.8. An alternative drainage strategy of restricted piped discharge via new offsite sewer and outfall to an existing offsite watercourse is included in the FRADS and includes no calculations. The new headwall shown may be on private land and permission would need to be evidenced for the physical works and discharge of the flows. Discharge to a watercourse should only be proposed as a method of disposal if discharge to ground is not viable.
- 1.9. The method of disposal of surface water should be established as part of the planning consent and cannot be deferred until discharge of conditions stage.
- 1.10. The design also includes a surface water pump at the base of the service ramp to Aldi. The use of pumps must be by exception only and agreed with the approving body due to the associated carbon, energy and maintenance implications, and the risks associated with failure and exceedance. The report states the pump is necessary but does not provide any supporting evidence that draining by gravity is not feasible. There are no proposed levels of sections shown in the FRADS to demonstrate the inability of draining this area by gravity.
- 1.11. The runoff destination is not currently in accordance with the requirements of the NSfS Standard 1. Therefore, we **object** to the application.

The following notes to be applied if an infiltration solution is found to be suitable for the groundwater levels:

- 1.12. The scope of the infiltration testing is limited by the existing building that is not yet demolished. The spread of testing is sufficient to overcome an objection to the principle of infiltration viability (for this full application). However, it is not sufficient for detailed design purposes.

- 1.13. Should the principle of infiltration be adequately demonstrated then further testing, in the areas beneath where the building currently stands, will be necessary. It is important to record the strata in the trial pits. There is a risk that the strata beneath the building could be made ground to a depth greater than the proposed infiltration blanket which may further restrict the area possible for infiltration.
- 1.14. Careful evaluation of shallow infiltration testing in the area of the existing car park and road is also important as the higher section of the test pit will be made ground formed of the foundation for the existing pavement.

## 2. Interception drainage

- 2.1. Interception drainage is currently provided by the infiltration solution. However, the design relies on the use of an unproven disposal method. If infiltration is proven to be viable then the interception drainage standard will be met.
- 2.2. Where infiltration has not been proven to be viable (as here) and there is a risk that interception drainage may only be delivered by evapotranspiration which can have a significant impact on the scale and layout of the proposed development.
- 2.3. The 'alternative scheme' included in the FRADS does not include a design and assessment for interception drainage and it does not appear that the proposed layout currently allows for surface features which would provide interception drainage.
- 2.4. Given the uncertainty regarding the disposal method, it is not possible to determine whether interception drainage has been adequately considered and accounted for within the layout of the development. Therefore, this standard has not been met.
- 2.5. Evidence has not been provided that interception drainage can be successfully incorporated into the sustainable drainage design. Interception drainage is not currently in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

## 3. Extreme rainfall and flooding

- 3.1. The current infiltration design relies on the use of an unproven disposal method.
- 3.2. The design infiltration rate used in the current set of calculations is acceptable but requires excavation of low permeability subsoil and replacement with engineered fill which mimics the characteristics of the more permeable layer below without reducing the pollutant retention process in the subsoil. This requires careful consideration and design and the scheme is dependant upon the success of the solution.
- 3.3. There is an area of surface water flood risk between the outline and full planning application sites. The proposed cover levels do not appear to be altered significantly from the existing topographical survey. However, the proposed levels will required further scrutiny to ensure that flood risk is not increased by the proposed development.
- 3.4. A drained areas plan is included and is acceptable.
- 3.5. The 10% annual exceedance probability (AEP) event is included. The current calculations show surcharged pipes and the report notes additional measures to be incorporated to manage silt, which is acceptable in principle, subject to further checks of the coordinated design and modelling.
- 3.6. The low point of the drainage system appears to be the gully adjacent to New Courtwick Lane at approximate ground level of 4.15m AOD. The design storm top water level in the storage is 4.134m AOD. The top water level in chamber S02 is 4.321m AOD. The gully therefore either floods or is very close to flooding which would spill onto New Courtwick Lane. Flooding the public highway during the design storm is not acceptable. Furthermore, the design factor of safety [FoS] for the infiltration blanket current FoS = 5 may therefore not be correct as major inconvenience (for example, flooding of roads) attracts a FoS of 10 in accordance with Table S3.1 NSfS.

- 3.7. Levels design should be provided with the drainage design to demonstrate the proposed solution is feasible with the site constraints and identifies all critical ground levels.
- 3.8. The two points above may further bring into question the overall feasibility of the scheme once the top water level needs to be reduced and the infiltration rate factor of safety is increased.
- 3.9. The management of extreme rainfall is not currently in accordance with the requirements of the NSfS Standard 3. Therefore, we **object** to the application.

#### 4. Water quality

- 4.1. The design relies on the use of an unproven disposal method. The application does not include an adequate assessment for water quality and treatment for the updated and unproven design. An assessment for the SuDS design is included in the FRADS but applies the mitigation indices of permeable pavement to separate impermeable access roads piped into the infiltration blanket.
- 4.2. It is expected that an assessment for water treatment is applied for each area which has different treatment methods. For example, the rain that falls on the surface of the permeable paving overlaying the infiltration blanket will receive a different level of treatment to the water that is collected in other medium pollution hazard areas that is piped to the blanket which then acts as a filter drain (with lower treatment indices).
- 4.3. The designer claims that additional treatment is provided through the use of proprietary membranes, however these have not been demonstrated to achieve the necessary level of treatment through a complaint assessment.
- 4.4. As the design may yet be subject to change, due to the unproven disposal method, the water treatment methods may need to be changed. This may impact the scale of development and layout of the site.
- 4.5. Further information is required to comprehensively demonstrate the scheme meets water quality requirements or whether additional measures need to be incorporated.

#### 5. Amenity

- 5.1. Currently no part of the drainage system is landscape led. No assessment of the application of SuDS Approach to amenity value is included in the report. The FRADS quotes assertions from the Planning Consultant that state that the scheme incorporates measures proportionate to the site's function. However, the application is for major development which therefore must meet all minimum operational standards within the NSfS. A more thorough assessment to address Standard 5 is required.

Repeat comments from December 2025:

- 5.2. As identified in our previous objection the applicant has provided no open features to enhance amenity value. The newly proposed permeable paving offers multifunctional benefit, by providing water treatment and storage as well as serving as parking for the development. However, the scheme does not attempt to keep water at the surface in open features. The design does not offer any opportunity for public appreciation of conveyance or storage features. The McDonald's includes an element of outdoor seating which could be enhanced with SuDS features, however, this does not appear to have been considered.
- 5.3. The SuDS design does not enhance the green infrastructure network, indeed, the designer argues that the inclusion of open features may have a negative impact on the Biodiversity Net Gain (BNG) strategy which is surprising. It is suggested that the ecology officer is consulted to verify the implication that open SuDS features on this site could not be accommodated whilst achieving or enhancing BNG requirements.

5.4. The introduction of the NSfS imposes stronger requirements for amenity than those suggested by The SuDS Manual which has design criteria rather than standards. The SuDS Manual does not ignore the sentiment or goals of those standards.

## 6. Biodiversity

6.1. Currently no part of the drainage system is landscape led or provides ecology value. No assessment of the application of SuDS Approach to ecology value is included in the report. The FRADS quotes assertions from the Planning Consultant which refers to BNG trading rules. However, the application is for major development which therefore must meet all minimum operational standards within the NSfS. Delivering biodiversity through sustainable drainage is a separate requirement to BNG. A more thorough assessment to address Standard 6 is required.

Repeat comments from December 2025:

- 6.2. It appears that the SuDS design has been considered separately from the ecology requirements for the site. This represents lost opportunity for biodiversity benefit to be offered by SuDS features on the site. As the design stands, it's only contribution to the delivery of biodiversity benefit appears to be by not delivering the benefit directly and allowing space for BNG to be achieved by other means.
- 6.3. The designer has shown that they have considered how biodiversity benefit may have been achieved by the SuDS. However, it appears that this consideration is limited by the proposed scale and layout of the development, rather than what features may have been possible if proposed at the conceptual design stage. The design fails to satisfy several of the requirements of this national standard and therefore it warrants **objection** on those grounds.
- 6.4. The introduction of the NSfS imposes stronger requirements for biodiversity than those suggested by The SuDS Manual which has design criteria rather than standards. The SuDS Manual does not ignore the sentiment or goals of those standards.

## 7. Construction, operation, maintenance, decommissioning and structural integrity

- 7.1. As previously stated, it should be noted that the Landscaping scheme may impact the drainage scheme in terms of the proximity of trees to pipework/SuDS features. It is recommended that the Landscaping Scheme is not approved at this stage, especially as the drainage scheme design could change. The proximity of root protection zones of both existing trees and new trees (at maturity) will need to be considered.
- 7.2. Other elements of this standard are normally approved via condition.

## 8. Suggested conditions / Overcoming the objection

- 8.1. As this is not a holding objection or a request for further information, requested conditions are not listed. If you are minded to approve this application, please reconsult engineers for a list of suggested conditions to ensure that the development is adequately drained and does not increase flood risk elsewhere.
- 8.2. **The imposition of conditions at this stage rather than overcoming the objection could result in a circumstance where the condition cannot be discharged. In the event of attaching a condition that cannot be discharged, permission may be invalid or that condition could be deemed to be unreasonable.**
- 8.3. If you are minded to allow the applicant additional time to submit further documents to support this application, then further evidence may overcome our objection. Please do not allow the applicant to submit further documents without prior discussion as to whether it will be possible for these to be assessed or influence your determination.

### Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only, together with land drainage aspects if deemed necessary.

Other planning matters occasionally effect the surface water drainage design. If plans relating to other matters have been assessed for their impact on the proposed drainage, then it must not be assumed that they have been assessed for any other purpose. The planning officer is advised to check for conflicts with any existing approved plans and to consult any relevant consultees as appropriate.

It has been identified that the following consultees may have comments about the plans that have been submitted and reviewed for this application:

- ☒ **Landscaping officer (proposed trees and landscaping)**
- ☒ **Tree officer (existing trees)**
- ☐ Environment Agency (main rivers and fluvial/tidal flood risk, River Arun internal drainage board, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network/groundwater source protection zones)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☒ **Lead local flood authority (all other sources of flooding and ordinary watercourses)**
- ☒ Other: **Ecology officer**
- ☐ None

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

To register to receive notification of planning applications in your area please go to  
<https://www1.arun.gov.uk/planning-application-finder>



**From:** Paul Cann <Paul.Cann@arun.gov.uk>  
**Sent:** 02 July 2026 10:26  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Cc:** Land Drainage <Land.Drainage@arun.gov.uk>; Emma Sheppard <Emma.Sheppard@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: LU/72/25/OUT

Please find enclosed our consultants responses in respect to both the outline and full applications, an objection.  
Regards

**Paul Cann**  
**Principal Drainage Engineer,** Coastal Engineers and Flood Prevention

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**Our priorities...**



Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 25 June 2026 12:03  
**To:** Land Drainage <[Land.Drainage@arun.gov.uk](mailto:Land.Drainage@arun.gov.uk)>  
**Subject:** Planning Consultation on: LU/72/25/OUT

To: **Engineers (Drainage)**

**NOTIFICATION FROM ARUN DISTRICT COUNCIL**

**TOWN AND COUNTRY PLANNING ACT 1990**

**Application No:** LU/72/25/OUT  
**Registered:** 29th April 2025  
**Site Address:** Land to the West of New Courtwick Lane Wick BN17 7RZ

**Grid Reference:** 502224 103596  
**Category:** Plan Applicat'n  
**Description of Works:** Hybrid Planning Application comprising of the following: 1) - Outline application with all matters reserved (except access) for Phase 2 (West of Site) comprising development of approximately 8,800sqm GIA Light Industrial/Storage and Distribution (Use Class E(g)(iii) / B8), and 2) - Full Application for Phase 1 (East of the Site) for a food store (Use Class E(a)), 2 No. Drive-Thru food/beverage units (Sui Generis) with revised vehicular access, associated parking and landscaping. This application may affect the setting of a listed building and is in CIL Zone 2 and is CIL Liable.

I am able to inform you that I have received an amendment to the above application dated 19th June 2026 relating to:- Substitute FRA & Drainage Strategy

If you should wish to make further representations as a result of this amendment, please make any further comment by **3rd July 2026**.

[Click here to view the application, documents and make further comments](#)

**Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. We will aim to redact signatures, telephone numbers and email addresses but please help us by not incorporating them in the body of your text. Please make sure that you only include information that you are happy will be published in this way. If you supply information belonging to a third party, you must make sure you have their permission to do so.**

Yours sincerely

Emma Sheppard

Planning Case Officer- Arun District Council

Telephone:

Email: [emma.sheppard@arun.gov.uk](mailto:emma.sheppard@arun.gov.uk)

PLRECON (ODB) 2018