

Emma Sheppard
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 19 August 2026

Dear Emma,

LU/72/25/OUT - Land West of New Courtwick Lane, Wick, BN17 7RZ

Thank you for consulting the Lead Local Flood Authority (LLFA) on the above application.

This hybrid planning application comprises:

1. **An outline application** (with all matters reserved except access) for Phase 2 (western part of the site), comprising approximately 8,800 sqm GIA of light industrial/storage and distribution development (Use Classes E(g)(iii) and B8); and
2. **A full application** for Phase 1 (eastern part of the site), comprising a food store (Use Class E(a)), two drive-through food and beverage units (sui generis), revised vehicular access arrangements, associated parking, and landscaping.

At present, the application does not demonstrate a viable or policy-compliant surface water drainage strategy. While additional information has been submitted, sufficient evidence is still required to demonstrate compliance with the National SuDS Standards, and the proposed alternative means of discharge remains unproven. Our detailed observations are set out below and are separated into comments relating to the outline and full application elements.

Both Elements

- The proposed alternative drainage solution, comprising a piped discharge to a watercourse, remains incomplete and unverified. No hydraulic calculations have been provided, and no evidence has been submitted demonstrating a legal right to discharge. **Partially addressed - outstanding.**
- The proposed discharge route should not be secured by condition until the applicant provides written confirmation from the relevant landowner and/or asset owner granting permission to connect to the receiving watercourse. Without such confirmation, and should infiltration ultimately prove unviable,

the site would have neither a lawful nor deliverable drainage solution.
Outstanding.

Full Application Element

- The groundwater monitoring record remains incomplete, with no data available between 17 February and 16 March. Consequently, it is not possible to confirm that the recorded groundwater level represents the seasonal maximum. The applicant should therefore either demonstrate that the recorded level captures the seasonal peak groundwater condition or apply an appropriate factor of safety within the drainage design. **Sufficiently addressed. Applicant has demonstrated to our satisfaction that they have captured the winter peak groundwater level and provides the required buffer.**
- Whilst the raising of site levels to achieve the required 1m unsaturated zone is acceptable in principle, the proposed use of engineered stone as a replacement for natural subsoil is unlikely to provide equivalent infiltration and water quality treatment performance. **Sufficiently addressed – as per materials/standards specified.**
- Given the uncertainty surrounding groundwater levels and the limitations associated with engineered stone, the proposed infiltration approach has not been demonstrated to comply with National SuDS Standard S1, which requires infiltration systems to be located within suitable ground conditions. **Partially addressed - Outstanding. Further clarification required.**

Outline Application Element

- Further infiltration testing and groundwater monitoring will be required to support this phase of development. **Partially addressed - outstanding.**
- To account for the possibility that infiltration is not feasible, the applicant should provide hydraulic calculations demonstrating the viability of the proposed alternative outfall and secure confirmation from the relevant asset owner that discharge will be permitted. **Partially addressed - outstanding.**

LLFA Position

The LLFA acknowledges the significant progress made by the applicant in responding to previous drainage concerns. The remaining issues are now limited and are principally evidential in nature rather than matters of drainage principle.

While the LLFA maintains an objection at this time, the outstanding matters appear capable of being addressed through further clarification and supporting information. Subject to satisfactory resolution of these points, the LLFA would anticipate being able to review its position positively and consider whether any remaining details could be secured through suitably worded planning conditions.

The **outstanding** matters are:

1. Confirmation that the applicant has the necessary legal rights, agreements, easements, consents, or permissions required to facilitate the proposed alternative surface water discharge.
2. Submission of supporting hydraulic calculations, including justification of any assumptions made, to demonstrate the viability and capacity of the proposed alternative discharge route.

3. Provision of sufficient evidence to demonstrate compliance with National SuDS Standard S1 and confirm that the proposed drainage strategy is both deliverable and sustainable over the lifetime of the development.

The LLFA therefore maintains a holding objection at this time but considers that the matters identified above are capable of being resolved.

Yours sincerely,

Mat Jackson
Flood Risk Management Team



The following documents were reviewed as part of this response:

- Flood Risk Assessment and Drainage Strategy prepared by HOP, June 2026

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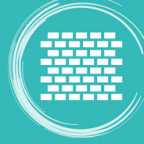
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From: Mat Jackson [REDACTED]
Sent: 19 August 2026 11:13
To: David Easton <David.Easton@arun.gov.uk>
Cc: Emma Sheppard <Emma.Sheppard@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>; Dominic Henly [REDACTED]
Subject: LU/72/25/OUT - Land to the West of New Courtwick Lane, Wick, BN17 7RZ

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David,

Please find attached our response to LU/72/25/OUT following Reconsultation to our April 2026 Objection. Please disregard/replace our response 03/07/26 and update the Planning Portal.

Kind Regards,

Mat Jackson *FCIWEM C.WEM CEnv CSci LLM MSc BSc (CombHons)*
Senior Flood Risk Management Officer
West Sussex County Council
[REDACTED]



Advanced Notice of Leave: 24th August – 1st September

From: David Easton <David.Easton@arun.gov.uk>
Sent: 18 August 2026 16:04
To: Mat Jackson [REDACTED]
Cc: Dominic Henly [REDACTED]
Subject: RE: LU/72/25/OUT - Land to the West of New Courtwick Lane, Wick, BN17 7RZ

****EXTERNAL****

Hi Mat,

Thanks for confirming. Just so you are aware I am on annual leave after Thursday until 1 September. We are taking this application back to committee next Wednesday as we needed to clarify a couple of reasons for refusal added by Members. If you could get me comments by Thursday lunchtime I can get the update report ready before I go away.

Many thanks,
David

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