



From: Elaine Walby on behalf of Planning.Responses
Sent: 15 July 2026 17:11
To: Planning Scanning
Subject: FW: LU/72/25/OUT
Attachments: Wick, Littlehampton - LU/72/25/OUT



Elaine Walby
Technical Support Assistant
Planning Services

T: 01903 737 904
E: elaine.walby@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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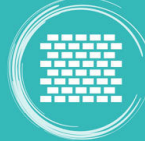
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From: Neil Crowther <Neil.Crowther@arun.gov.uk>
Sent: 15 July 2026 16:01
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: LU/72/25/OUT

Neil Crowther
Group Head of Planning & Building Control

T: 01903 737839
E: neil.crowther@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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From: Adrian Goodall
Sent: 15 July 2026 16:00
To: David Easton; Neil Crowther; Karl Roberts
Cc: Chris Barker; Megan Smith; Barry Ackerman; Nick Mager
Subject: Wick, Littlehampton - LU/72/25/OUT

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Dear David, Neil, and Karl,

I am writing to express my disappointment regarding the publication of the July Planning Committee Report, which recommends refusal for the proposed development at New Courtwick Lane solely on drainage grounds.

Having reviewed the published consultee responses from the Arun Drainage Engineer and the Lead Local Flood Authority (LLFA), we have significant concerns that our latest, comprehensive submissions have not been properly reviewed or considered.

This is particularly clear from the attached LLFA comments (dated 2nd July 2026) which provide no acknowledgement of the updated submitted drainage information and refer solely to the previous comments dated 22nd May 2026 (also attached) despite their concerns being clearly addressed within the submitted updated Flood Risk and Drainage Strategy (FRADS) submitted on 17th June 2026.

Proceeding to Committee with a recommendation for refusal under these circumstances represents a clear procedural failure. It is highly vulnerable to challenge, and we ask the Council to consider how this position would be defended at appeal. The Council risks being seen as acting unreasonably by refusing a scheme where a viable engineering solution has been demonstrated but ignored.

To demonstrate where the Committee Report's summary (screenshot/dark text) of the drainage objections is factually incorrect, we have set out below a direct comparison of the key points raised versus the actual evidence already in your possession:

Despite several updates of the FRADS, they maintain an objection based on failed to provide percolation test results undertaken consistently in the winter months (October-March).

It is unclear if this refers to groundwater monitoring or percolation testing (also called infiltration testing or soakage testing). Percolation testing was carried out in December for Phase 1 (Appendix C of FRADS report) to the satisfaction of the Arun engineer and the LLFA. For Phase 2 initial soakage testing was undertaken by GESL (Appendix D). Groundwater monitoring was undertaken through October to mid-February and is considered to have covered the period of the peak groundwater level (as results in Appendix B and comprehensive discussion within the FRADS report paras 3.12 to 3.21). The National Standards for SuDS (NSfS) requires the following;

4.16.2 The design of systems which discharge surface water runoff to ground should accommodate wet winter conditions and evidence from groundwater records at or in the vicinity of the site should be used to demonstrate the maximum likely groundwater levels. This should include sufficient data collected to demonstrate seasonal groundwater levels to inform the assessment and design.

In the context of the discussion regarding peak groundwater levels in the FRADS report, it is considered that the maximum likely groundwater level has been demonstrated and we have complied with the requirements of Para 4.16.2 of the National Standard for SUDS.

There is an omission of information required to demonstrate the viability of the proposed method of surface water discharge which may impact final layout, particularly in relation to winter shallow infiltration testing.

Winter shallow infiltration testing was carried out and indicated viable infiltration (Appendix C and paras 3.22 to 3.33) – the testing methodology on Phase 1 was agreed with the Arun engineer. The LLFA were satisfied with the principle of infiltration being applied (see response in following comment below).

There was an omission of testing for a two week period at the end of February, however we had demonstrated that high ground water levels were already receding.

Arun Engineers - Original comments state insufficient information submitted to evidence that the design of the proposal is achievable and will not increase flood risk. Further to this, the design also fails to meet current requirements in terms of sustainability. Updated details have been submitted on a number of occasions with 7 consultations having been provided with Arun Engineers maintaining their objection.

This comment seems to cover a general view and does not go into detail of the specific reasons for maintaining an objection. It is worth noting that during the submission of additional details, the LLFA were satisfied with the design approach and removed their objection, with the imposition of robust conditions to establish the detailed drainage design. Extract of LLFA response of 19.01.2026 (original strikethrough text included) is set out below:

We are **able to recommend approval** of this planning application due to the submission of further information clarifying the viability of the proposed method of surface water discharge which may impact the final layout, particularly in relation to winter shallow infiltration testing. To help with overcoming our objection we sought clarification of the following:

- ~~1. A brief note demonstrating how application meets the current SuDs principles (June 2025) to assess against any preliminary results as necessary.~~
2. The Groundwater and soakage testing is implemented, and we can review these results. Preliminary results potentially could be considered early 2026. **Sufficient information provided.**

The submitted drainage information is fragmented across multiple technical notes and iterations, preventing a coherent understanding of a single, deliverable drainage solution. Critically, the application fails to demonstrate a viable or policy-compliant drainage strategy, with key evidence remaining absent, the drainage hierarchy not properly followed and the principal method of surface water disposal remaining unproven.

This is not correct. We provided a complete and comprehensive report in our last response (FRADS report dated 17.06.2026), which collated and expanded upon the previous responses. This does not seem to have been taken into account in the recommendations or acknowledged in subsequent responses from the Arun engineer or the LLFA. We assume that the hierarchy comment is reference to rainwater re-use before infiltration. Arun's own comments state that rainwater harvesting alone would not be sufficient to manage runoff (Arun consultation response of 18.05.2026);

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 a viable infiltration design is achievable.

Viable infiltration was accepted by the LLFA and demonstrated within the FRADS report, as detailed above.

Additionally, we have asked for meetings to discuss the scheme and have not been given the opportunity to talk face-to-face. The mention of a 'single' drainage solution being presented is confusing, as it was the Arun engineer who requested that an alternative approach be considered in the event of infiltration testing not being viable (Arun consultation response of 18.05.2026);

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.

infiltration is therefore unproven. The alternative drainage strategy involving discharge to a watercourse is also unproven in terms of deliverability, since it is not supported by fully sufficient hydraulic calculations, and lacks evidence of legal agreement to outfall. In the absence of a confirmed and deliverable drainage

This is not correct. We have provided hydraulic calculations in our last response within the FRADS report (Appendices L and M and paras 7.18 to 7.26)). We cannot have a legal agreement in place to discharge at this stage, but we have shown that the connection would be through statutory mechanisms with Southern Water/Highways/the EA and not private third parties – a typical approach as outlined in paras 7.18 to 7.26.

There does not appear to be any reasoning in the recommendations as to why Conditions cannot be applied that would satisfy the more technical details. The Arun engineer has previously requested that further testing is carried out once the building is demolished, which can only be done post-planning; and the LLFA were satisfied at one stage that Conditions could be imposed to their satisfaction (see above and Arun consultation response of 18.05.2026, below);

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.

It is disappointing, that the comments do not represent a fair assessment of the significant efforts made to demonstrate that there is a viable engineering solution to the management of surface water runoff at the site. By saying that Conditions cannot be applied because the Arun engineer does not consider that they can be met, to my mind demonstrates an unwillingness to understand the technical aspects of the site constraints, the current drainage arrangement at the site (via soakaways) and the SuDS principles applied to surrounding developments.

The current consultee comments do not represent a fair, objective assessment of the exhaustive technical work undertaken to prove a viable drainage solution exists. To state that conditions cannot be applied because they "cannot be met" suggests a fundamental unwillingness to engage with the technical realities of the site, its current drainage (via soakaways), and established SuDS principles applied nearby. They can however be addressed by suitably worded conditions as previously suggested by the LLFA.

We ask you to liaise with your drainage consultees to provide an appropriate addendum to this planning committee report, carefully considering the submitted information.

Regards

Adrian Goodall