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From: Neil Crowther <Neil.Crowther@arun.gov.uk>
Sent: 22 July 2026 13:37
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Drainage Matters - Proposed Development at New Courtwick Lane, Wick, Littlehampton | LU/72/25/OUT

From: Sussex Planning [redacted]
Sent: 17 July 2026 14:18
Subject: Drainage Matters - Proposed Development at New Courtwick Lane, Wick, Littlehampton | LU/72/25/OUT

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Dear Councillor,

Further to the attached brochure issued by Aldi, we would like to set out some additional context with regards to drainage matters and the Planning Committee Report on this **much-needed regeneration scheme at New Courtwick Lane, Wick, Littlehampton**. This application is to be heard at Planning Committee on Wednesday 22nd July.

The scheme represents significant local investment, job creation, and a new discount food store for Wick, however the application has been recommended for **refusal solely on drainage grounds**. There are no outstanding objections regarding retail impact, highways, design, heritage, noise, or the principle of land use.

We are writing to address the concerns raised in the Planning Committee Report. Our review indicates that the recommendation for refusal is based on procedural misunderstandings of the submitted information, rather than technical issues.

Crucially, **a complete, consolidated Flood Risk Assessment and Drainage Strategy (FRADS) was submitted on June 17, 2026**, which resolved previous queries. It appears this document was not fully reviewed by the drainage consultees before the Committee Report was published.

Firstly, for context the existing site and building already drains to soakaways, with no known problems. That practical, real-world experience demonstrates that infiltration drainage can work on this site and that a technically workable solution is clearly available.

Below, we provide a direct comparison of the objections raised in the Committee Report against the actual evidence already in the Council's possession.

Committee Report Objection	Technical Fact & Submitted Evidence (June 2026 FRADS)
"Fragmented information... preventing a coherent understanding of a single, deliverable solution."	Incorrect. On June 17, 2026, we submitted a single, comprehensive, and consolidated FRADS report (Rev P01). This document collated all previous technical notes into one clear, stand-alone strategy. It appears this final report was overlooked in the officer assessment.
"The alternative piped discharge strategy lacks hydraulic modelling, calculations, and legal outfall rights."	Factual Error. Section 7.0 and Appendices L & M of the June 2026 FRADS contain full design layouts and complete hydraulic calculation outputs for the alternative attenuation system. Legal rights of outfall are not required at this stage; connection would be achieved through standard statutory processes via Southern Water, Highways, and the Environment Agency.
"Groundwater monitoring contains a notable gap... meaning seasonal high groundwater has not been established."	Incorrect. While a localized equipment malfunction occurred for two weeks in late February, monitoring was continuous from October through mid-February. It captured the absolute peak groundwater level on February 6, 2026 (+2.383mAOD) . This peak is scientifically verified by Environment Agency regional data (Beeding Hill) and neighbouring sites, which confirm groundwater levels steadily receded after this date.
"Proposed ground raising and engineered stone do not provide equivalent performance."	Incorrect. Raising the site level by a modest 333mm ensures a 1.0m unsaturated zone above the peak groundwater level, satisfying national standards. The proposed engineered fill will be specified to match or exceed the permeability of natural soils in accordance with standard civil engineering specifications (Specification for Highway Works Series 600).
"Reliance on infiltration is not supported by site-wide testing, particularly on the Phase 2	Standard Practice. Phase 2 is an outline application with all matters reserved except access. Detailed drainage design is not legally required at outline stage. However, British Geological Survey

Committee Report Objection	Technical Fact & Submitted Evidence (June 2026 FRADS)
(Outline) site."	(BGS) mapping and adjacent testing prove Phase 2 shares identical geology (River Terrace Deposits) with Phase 1, establishing the principle of viability. Detailed testing will follow at Reserved Matters.
"The scheme relies heavily on sub-surface solutions and lacks open, multifunctional SuDS features (swales/basins) for amenity and biodiversity."	Inappropriate for Land Use. The development is a commercial food store, drive-thrus, and industrial units. Introducing open water basins into a high-traffic retail environment with active HGV delivery ramps raises serious operational safety and management concerns. Amenity and biodiversity are instead delivered through extensive native landscaping and tree planting.

The Existing Site Drainage and Proposed Strategy

- **Current Status:** The existing site is located entirely within **Flood Zone 1** (the lowest category of flood risk).
- **Historical Performance:** The existing vacant warehouse has drained successfully via a traditional soakaway system for over 20 years. The site has **no history of flooding**.
- **The New Requirement:** Because a new development is proposed, we must implement a modern drainage system that meets the recently updated, highly rigorous National sustainable drainage (SuDS) standards. The old system, while functional, does not meet these modern requirements.

We have designed a comprehensive, sustainable drainage strategy that meets these updated standards. The drainage design uses infiltration (the preferred method within the National SuDS Standards) by managing rainfall at source and utilising permeable paving and shallow "infiltration blankets" (stone-filled underground storage layers) to filter water and allow it to soak naturally back into the ground.

The Procedural Deadlock (Why Planning Conditions are the Correct Mechanism)

The central reason for the officers' objection is that we have not provided a full suite of soil testing across the entire site footprint to finalise detailed design.

While we are fully committed to this testing, **it is physically impossible to test the ground directly beneath the foundations of the existing warehouse while it is still standing.**

Arun's own drainage engineer previously acknowledged this physical constraint in writing:

"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... However, it is not sufficient for detailed design purposes."

In the highly unlikely event that post-demolition testing reveals localised ground constraints, we have submitted a fully modelled backup plan. This alternative strategy attenuates (stores) the water on-site and releases it at a controlled, safe greenfield rate into the nearby Eel Springs Ditch.

How Planning Conditions Resolve This Safely:

Standard planning practice across the UK utilises **Pre-Commencement Planning Conditions** for this exact scenario. Under this mechanism, the Committee grants planning permission subject to a condition requiring:

1. Demolition of the existing building to clear the site.
2. Immediate execution of localised, deep-ground testing on the newly exposed land.
3. Submission and formal approval of the finalised, detailed drainage drawings by Council engineers **prior to any new construction starting**.

This process ensures the Council retains absolute legal control. If the final detailed designs do not satisfy the Council's engineers, construction cannot legally begin.

Conclusion

Refusing this application does not protect the area from flood risk—the site is in Flood Zone 1 and has no history of flooding. Instead, a refusal delays a major local investment on a technicality that is routinely resolved via conditions and will be challenged at appeal.

The applicant has demonstrated that:

1. The site is at the lowest risk of flooding (Flood Zone 1).
2. The principle of the proposed sustainable infiltration drainage system is entirely viable.
3. A fully modelled, policy-compliant backup strategy is available.
4. The remaining detailed data can only be physically obtained once the vacant building is demolished.

We respectfully request that the Committee **approve the application, subject to a robust pre-commencement drainage conditions**, or defer the decision to allow officers to draft mutually acceptable conditions.

Thank you for your time and consideration of this application.