

Engineers Comments Regarding Surface Water Drainage

Application Reference:	LU/72/25/OUT (1)	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Emma Sheppard	Date of Review:	23/12/2025
Site Name:	Land to the West of New Courtwick Lane Wick BN17 7RZ		
Application Description:	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.		
Assessment Number:	4		

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
----------	-----------

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Objection
2. Interception drainage	Not applicable (OUTLINE application)	No objection subject to conditions
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Not applicable (OUTLINE application)	No objection subject to conditions
5. Amenity	Not applicable (OUTLINE application)	No objection subject to conditions
6. Biodiversity	Not applicable (OUTLINE application)	No objection subject to conditions
7. Construction, operation, maintenance, decommissioning and structural integrity	Not applicable (OUTLINE application)	No objection subject to conditions

Reviewed Plans

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

- Drainage Engineers Response
- Engineers Comments Regarding Surface Water Drainage
- Drainage - LLFA Response Comments 16782-2 HOP (dated 27.7.25)
- Drainage - Arun Response Comments 16782-2 HOP (dated 29.7.25)
- Drainage\16785-02 - HOP Planning Responses Appendices C(cont) - D (Part 2)
- Drainage\16785-02 - HOP Planning Responses Appendices A-C (Part 1)
- SUDS TESTING PLAN PHASE REV P1
- HOP response with SuDs Testing Oct 2025
- Flood Risk Management Team Response Dec 2025

-Drainage Engineer Response Dec 2025
 -DAS, uploaded in 3 parts via the public planning portal
 -DRAINAGE APPENDICES
 -FRA AND DRAINAGE STRATEGY
 -Proposed Site Plan_Phase 1 2255-P-010D
 -Proposed Site Plan_Phase 2 2255-P-011D
 -UNIT 5 ELEVATIONS 012 V2
 -UNIT 3/4/6/7 ELEVATIONS 010
 -EXISTING TOPOGRAPHICAL SURVEY 23029-02-T-E SHEET 1 OF 1
 -ILLUSTRATIVE LANDSCAPE STRATEGY PLAN CSA/6408/201 REVC
 -DEMOLITION PLAN 2255-P-008 A
 -EXISTING ELEVATIONS 2255-P-007 A
 -EXISTING FIRST FLOOR PLAN 2255-P-006 A
 -EXISTING GROUND FLOOR PLAN 2255-P-005 A
 -EXISTING SITE SURVEY PLAN 2255-P-004 A
-HOP Letter dated 2 December 2025, reference AK/SMB/16785-02

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.
- 0.2. We have reviewed the letter report ref AK/SMB/16785-02 dated 2/12/2025.
- 0.3. The latest submission of additional information does not alter our assessment of this application as it relates to proposed infiltration testing. The necessary site investigations have not been completed. It is suggested by the applicant that this testing and the fundamental SuDS design can be secured via condition as the scale and layout are not fixed. We dispute this, as clearly communicated in our objection dated 23 September 2025.
- 0.4. This consultation only provides updated comment regarding the adequacy of the proposed testing and should not be seen to supersede our previous objection which still stands. It is replicated below to avoid any confusion.
- 0.5. **No proposed testing for the outline parcel has been submitted for assessment.** 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.

Copied from objection dated 1 December 2025:

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. This is critical as

the applicant has not identified any alternative means of draining surface water from the site. Indeed, in their response to our last objection the designer has stated that “connecting off-site at a limiting rate, is not considered 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).

1.4. As no viable alternative runoff destination has been suggested, 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 unclear how the site will drain surface water. This could lead to an increase in flood risk on site or elsewhere.

1.5. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

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. This advice does **not** reflect a departure from the guidance of The SuDS Manual.

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. If infiltration

is not viable then the applicant has no submitted location or discharge rate with which they could then design the future SuDS scheme for. This means that flood risk could be increased by the proposed development if they design the layout according to a strategy which is not viable or uncompliant.

3.3. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

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.**

4.3. This advice does **not** reflect a departure from the guidance of The SuDS Manual.

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

Application Reference:	LU/72/25/OUT (2)	Reviewer Reference:	ADC/EXT5/AF
Planning Officer:	Emma Sheppard	Date of Review:	23/12/2025
Site Name:	Land to the West of New Courtwick Lane Wick BN17 7RZ		
Application Description:	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.		
Assessment Number:	4		

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
----------	-----------

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 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	Objection in principle.
2. Interception drainage	Insufficient – disposal method unproven	Objection
3. Extreme Rainfall and Flooding	Insufficient	Objection
4. Water Quality	Insufficient	Objection
5. Amenity	Insufficient	Objection
6. Biodiversity	Insufficient	Objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Insufficient	No objection subject to conditions and landscaping not being approved.

Reviewed Plans

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

- Proposed Site Plan_Phase 1 2255-P-010D
- Proposed Site Plan_Phase 2 2255-P-011D
- EXISTING TOPOGRAPHICAL SURVEY 23029-02-T-E SHEET 1 OF 1
- ILLUSTRATIVE LANDSCAPE STRATEGY PLAN CSA/6408/201 REVC
- 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**

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. The latest submission of additional information does not alter our assessment of this application as it relates to proposed infiltration testing. The necessary site investigations have not been completed. It is suggested by the applicant that this testing and the fundamental SuDS design can be secured via condition. We dispute this, as clearly communicated in our objection dated 23 September 2025.
- 0.3. This consultation only provides updated comment regarding the adequacy of the proposed testing and should not be seen to supersede our previous objection which still stands. It is replicated below to avoid any confusion.
- 0.4. The proposed 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.
- 0.5. 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.
- 0.6. 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.
- 0.7. Ground water levels measured in accordance with our published guidance should be compared with the design base of storage relative to Ordnance Datum to confirm compliance with National SuDS Standards requirements.

Copied from objection dated 1 December 2025:

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, the submitted ground investigations for the full application site are inadequate to demonstrate that a viable infiltration design is achievable.
- 1.3. This is because the groundwater monitoring does not capture the full winter period and the infiltration testing at compliant depths was completed in summer. The groundwater monitoring commenced on 4 March 2025. The highest groundwater level was recorded on that date, with

observations continuing until 24 April 2025. It is likely that the peak seasonal level has not been recorded as the monitoring started too late in the winter period, in reality spring. This is important as if groundwater levels are significantly higher in winter conditions, then it can affect the viability of infiltration. This is because 1m of unsaturated ground must be achieved between the base of an infiltrating feature and the peak expected groundwater level.

- 1.4. The infiltration testing, completed in June, demonstrated that there is likely to be some infiltration potential at shallow depths in 2 parts of the full application site. However, one of the 3 tests failed and all of them were completed (at least partially) into made ground (SUBBASE). The location of the tests was not submitted with the report, however, they are shown on the drainage layout appended to the designer response. The strata within the trial pits were also not recorded (or submitted) and this consultation therefore relies on the records from the initial site investigation in Appendix A of the designer response.
- 1.5. For the proposed 3800m² infiltration blanket, they have a single summer infiltration test within its area, and one further south outside of its area. This is an inadequate quantity of testing.
- 1.6. For context, BRE DG 365 states that testing should be completed every 25m along an infiltration feature to generate a design infiltration rate. For a feature of this size that would equate to approximately 7 tests spread evenly over the area, these tests must be at the depth and head of water to correspond with the design and completed in worst case conditions, which the guidance stipulates is in winter or spring.
- 1.7. The tests were completed at 0.85m below ground level (bgl), with a head of water of 0.45 and 0.55m. Yet the infiltration blanket is set 1.15m bgl, (deeper into the river terrace deposits), and with a design head of 0.85m. This does not replicate the testing.
- 1.8. It is noted that all testing completed within the river terrace deposits, at greater depth, in winter, have failed. It is reasonable to assume that some, if not all of these winter testing failures relate to interference with the groundwater. However, the designer has not demonstrated that infiltration at the depth proposed is viable.
- 1.9. The designer suggests that the tests provide “comfort that a shallow infiltration system could be practicable” (my emphasis). This is an unacceptable level of uncertainty at this stage of the planning process. The designer has stated that they believe a second option of connecting off-site at a limiting rate is not considered viable. This implies that they believe that infiltration is the only solution to drain rainwater from the site.
- 1.10. Given the uncertainty about the viability of infiltration on this site, and with the knowledge that there appear to be limited alternative options we must **object in principle** to the application.
- 1.11. It is noted that the applicant was informed of the need for robust ground investigations to support a full planning application in their pre-application advice from us which they have appended to the FRA (Appendix H).
- 1.12. The design also includes a surface water pump at the base of the service ramp to Aldi. The designer recognises that pumping is “expressly considered as a last resort [sic] only”. However, they have not acknowledged this pump within their response or the FRA. Its use has not been

justified or agreed to. The use of pumps must be by exception only due to the associated carbon, energy and maintenance implications, and the risks associated with failure and exceedance.

1.13. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

2. Interception drainage

2.1. The design relies on the use of an unproven disposal method. If infiltration is later proven to be viable then the interception drainage standard will be met.

2.2. However, 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.

2.3. 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.

2.4. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

3. Extreme rainfall and flooding

3.1. The design relies on the use of an unproven disposal method. The design infiltration rate is inadequately proven and therefore the system may be undersized to reflect the infiltration potential of the ground. This may result in flooding of the design which would not be demonstrated within the submitted modelling.

3.2. 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 require further scrutiny to ensure that flood risk is not increased by the proposed development.

3.3. A contributing area plan has not been submitted for the site. Some of the contributing areas are shown on the drainage layout, however, these do not accurately correspond with the modelling. A contributing area plan is necessary to confirm that the network has been modelled correctly. If the contributing areas are not accurate in the model, then this could result in increased flood risk of the system.

3.4. The 10% annual exceedance probability (AEP) event has not been modelled. This is necessary for infiltration designs to demonstrate that incoming pipes are kept above this level to reduce the risk of siltation.

3.5. A detailed comparison between the model and the drainage layout has not been completed due to the overarching objection relating to infiltration viability and necessary design changes as a result of other elements of this consultation.

3.6. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

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 initially proposed SuDS design is included in the FRA. There is comment upon water treatment for the updated design in the designer response, however a formal assessment has not been completed. The simple index approach has not been applied to demonstrate compliance.

- 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. These measures are also not shown on the drainage layout.
- 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. This objection does **not** reflect a departure from the guidance of The SuDS Manual.

5. Amenity

- 5.1. 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.
- 5.2. 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.
- 5.3. 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. 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.
- 6.2. 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.

6.3. 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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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>



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: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 24 December 2025 10:36
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: RE: Planning Consultation on: LU/72/25/OUT

Please find enclosed our external consultants responses for phases 1 and 2.

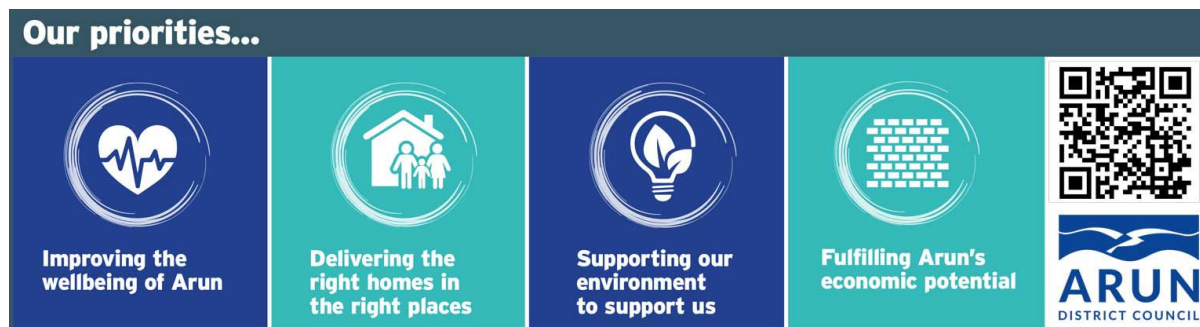
Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

E: paul.cann@arun.gov.uk

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



From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 09 December 2025 16:34

To: Land Drainage <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 8th December 2025 relating to:- Updated retail and drainage response

If you should wish to make further representations as a result of this amendment, please make any further comment by **24th December 2025**.

[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

PLRECON (ODB) 2018