

Alice Gibbs,
West Sussex County Council,
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Northleigh,
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Chichester,
West Sussex
PO19 1RH

Date: 22nd September 2026

Dear Alice,

RE: DC/26/1168

Thank you for your consultation response dated 25 August 2026 and for setting out your concerns regarding the proposed infiltration-based drainage strategy.

We have reviewed the points raised and, whilst we acknowledge that further confirmation of infiltration conditions would be beneficial, we respectfully consider that the objection could be addressed through clarification and, where appropriate, targeted additional investigation as part of the detailed design, rather than requiring the principle of the proposed drainage strategy to be reconsidered at this stage.

The submitted Flood Risk Assessment and Outline Drainage Strategy have been prepared having regard to the available Site investigation and infiltration testing. TPO1 and TPO2 provide infiltration information from within the development Site and, importantly, the testing was undertaken to greater depths than the proposed infiltration features within uniform geology (topsoil onto head deposits) identified across the Site area. The results therefore provide useful Site-specific evidence of the underlying ground conditions and infiltration characteristics relevant to the proposed drainage strategy.

We acknowledge that TPO3, located at the proposed infiltration basin, did not produce a completed infiltration test due to the time constraints associated with the investigation. This is a limitation of the current evidence, but it does not in itself demonstrate that infiltration is unsuitable at the basin location. The existing investigation provides a basis for understanding the Site's ground conditions, while the final detailed design can incorporate the results of additional investigation at the relevant locations.

In our view, the available investigation has therefore demonstrated the principle of infiltration-based drainage across the Site. This is further supported by the fact that infiltration drainage has also been demonstrated and accepted on the immediately adjacent development Site, providing additional evidence that the underlying ground conditions are capable of supporting infiltration drainage in this locality.

We also note that the requirement for infiltration assessment should be considered in the context of the wider ground model rather than solely by reference to whether an individual test has been undertaken at every proposed infiltration feature. CIRIA's infiltration assessment guidance emphasises that consideration should be given to whether the test results are representative of the wider ground mass, together with the soil profile, groundwater conditions and the likely long-term infiltration characteristics.

On this basis, we consider that the existing information, including the testing at TPO1 and TPO2, provides relevant evidence in support of the proposed infiltration strategy. Nevertheless, to address the LLFA's concern and remove any uncertainty regarding the proposed infiltration basin, we would be willing to undertake supplementary infiltration testing at TPO3, or at the finalised location of the basin, in accordance with the relevant BRE 365 methodology.

We would therefore respectfully request that the objection is reconsidered on the basis that:

1. TPO1 and TPO2 provide Site-specific infiltration data and were undertaken to depths greater than those proposed for the infiltration features;
2. The submitted assessment has considered the available ground conditions in developing the proposed drainage strategy;
3. The absence of a completed infiltration test at TPO3 represents a gap in the current evidence rather than evidence that infiltration is unsuitable;
4. Additional targeted testing can be undertaken at the proposed infiltration basin location to confirm the infiltration characteristics and inform the detailed design; and
5. The detailed design can subsequently be secured through an appropriate drainage condition requiring confirmation of the infiltration rates, final storage volumes, groundwater separation distances and detailed construction arrangements prior to implementation.

We would also note that current SuDS guidance recognises the importance of assessing infiltration in the context of the wider Site ground model and the representativeness of test results, rather than relying solely on a prescriptive number of individual tests.

Accordingly, we consider that the identified matter is capable of being satisfactorily addressed through targeted supplementary investigation and an appropriately worded condition, rather than constituting a reason to object to the application in principle.

We would be grateful if the LLFA could confirm that, subject to the provision of supplementary infiltration testing at the proposed basin location and confirmation of the resulting infiltration rate within the drainage strategy, the current objection could be withdrawn.

Yours sincerely,

Anna Whiteley

Aqua Terra Director

