

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/40/25/PL	Reviewer Reference:	ADC/EXT4
Planning Officer:	Amber Willard	Date of Review:	17.09.2025
Site Name:	Sefter Farm Pagham Road Pagham PO21 3PX		
Application Description:	Erection of warehouse extension and remodelling of existing reservoir. This application is in CIL zone 5 (zero rated) and may affect the setting of a listed building.		
Assessment Number:	1 of 2		

Policy and Guidance Information

Arun District Council Surface Water Drainage Guidance - <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/> and <https://www.arun.gov.uk/land-drainage-consent/>

Arun District Council surface water pre-commencement conditions - <https://www.arun.gov.uk/planning-pre-commencement-conditions>

National Standards for Sustainable Drainage Systems (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
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Critical Items for Surface Water Drainage Design Conditions

The failure to adequately address the following items will result in an objection to a surface water drainage design.

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.

Critical Item	Reason	Status
Winter groundwater monitoring data.	Adequate winter groundwater monitoring data must be supplied to evidence that infiltration designs have sufficient freeboard from the base of structures and the peak groundwater level. The same data is necessary to ensure that the potential for buoyancy has been adequately considered in attenuation designs.	Not supplied

The hierarchy for sustainable drainage.	The proposed discharge method must accord with the SuDS hierarchy as given below. Evidence must be supplied to justify the proposed discharge method. 1. Rainwater reuse where possible. 2. Complete discharge into the ground (infiltration). 3. Hybrid infiltration and restricted discharge to an appropriate water body or surface water sewer. 4. Restricted discharge to an appropriate water body. 5. Restricted discharge to a surface water sewer. 6. Restricted discharge to a combined sewer. A water body may be defined as a river, watercourse, ditch, culverted watercourse, reservoir, wetland or the sea. Engineers cannot support any proposed connection of surface water to the foul sewer.	Compliant
Calculations	Calculations for pre-development run off rates must be based upon the positively drained area only. Proposed discharge rates must not increase flood risk on site or elsewhere. Discharge rates must be restricted to QBAR or 2 l/s/ha, depending on whichever is higher.	Insufficient
	Designs must be based on the most recently available rainfall data at the time of conditions being applied. <u>FSR rainfall data will not be accepted.</u> FEH rainfall data is based upon more recent records and continues to be updated.	Compliant
	Designs must use the correct climate change allowances at the time of determination of the outline or full planning application. CV values for all events must be set to 1. This includes summer, winter, design, and simulation events. The correct allowance for urban creep must be applied.	Compliant

	Additional storage must be set to zero unless it can be evidenced where this is provided. Infiltration half-drain times must be less than 24 hours. Infiltration design rates must be applied to the sides of soakaways, or to the base of infiltration blankets. Design rates must not be applied to both the base and sides of infiltration structures. A surcharged outfall must be modelled.	
Natural catchments design.	The submission must define the natural drainage characteristics within, and hydraulically linked to, the site and demonstrate that the drainage proposals will integrate with and not compromise the function of the natural and existing drainage systems. The condition, performance (including capacity where appropriate) and ownership of any existing site surface water drainage infrastructure must be accurately reported. Appropriate easements to watercourses and other services must be shown on all plans. Where there are areas of flood risk from any source on the site, it must be shown how a sustainable surface water drainage design can be accommodated on the site without conflicting with those areas of flood risk. Designs must replicate the natural drainage catchments of the site. All surface water drainage designs must therefore drain via gravity to corresponding points of discharge. The use of pumps for surface water drainage is not sustainable and will only be considered where the designer has fully demonstrated that they are proposed as a last resort.	Insufficient
Plans	Plan areas, depths and levels of drainage infrastructure must accurately correspond with the supporting calculations.	Insufficient
Trees and planting	There should be no conflict between surface water drainage infrastructure and existing or proposed trees or planting.	Not supplied

	The design must consider the potential growth of proposed trees and adequate mitigation must be provided to protect drainage infrastructure where conflict <u>cannot</u> be avoided.	
Site Specific Flood Risk Assessment	A site specific FRA is required to support the proposals.	

Drainage Impact on Other Planning Matters

This application has been assessed with regards to surface water drainage design only.

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, groundwater source protection zones)
- ☐ Southern Water (foul drainage and surface water disposal to public sewer network)
- ☐ Portsmouth Water (groundwater source protection zones)
- ☐ Lead local flood authority (all other sources of flooding and ordinary watercourses)
- ☐ Other:
- ☐ None

Additional comments to the planning officer

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' 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.

This consultation has been primarily informed by The SuDS Manual.

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

- Existing site layout 102
- Existing ditch details 103
- Site layout - proposed drainage sheet 1 201
- Site layout - proposed drainage sheet 2 202
- Proposed site layout plan P004 03
- Proposed reservoir - plan and sections 251
- Proposed realigned ditch 252
- Construction details - drainage 511
- Construction details - drainage 512
- Surface water drainage checklist
- Surface water drainage statement

In accordance with footnote 63 of the NPPF A site specific flood risk assessment should accompany this application, as application site is larger than 1 hectare. The flood risk assessment should not only assess the existing risks of flooding but also assess the impacts downstream as a result of the reduction of the existing reservoir and extension proposals.

The impact on reducing the existing reservoir whilst still maintaining the current pumped surface water flows to a “downstream” reservoir for irrigation is unclear to whether this may or may not over inundate the “offsite” reservoir. The FRA should assess these impacts provide evidence with calculations, include impacts of potential failures of this reservoir and means of discharge to an existing surface water system, should irrigation operations reduce or cease in the future.

The additional surface water storage needs to be considered above the irrigation storage levels to consider the potential impacts should irrigation operations cease over the lifetime of the development

Without an assessment on the Impact of the additional surface water attenuation storage requirements there is risk that this could impact on the scale or layout of the development proposals

It is noted that there are proposals to divert the existing watercourse. Evidence of positive dialogue over these proposals with the LLFA is required to ensure that these proposals will be acceptable. The applicant will need to obtain an Ordinary Watercourse Consent in order to carry out any works or diversions to this existing watercourse

Overcoming the objection

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 try and ensure that the development is adequately drained and does not increase flood risk elsewhere.

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.

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.

Application Reference: P-40-25-PL Site Name: Sefter Farm Pagham Road Pagham PO21 3PX	Initial Issue Date: 17.09.2025 Issue Date: 17.09.2025 Reviewer Reference: ADC/EXT4
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Summary and Recommendation:

Objection

Please note: Any DOC application should only have a maximum of two consultation responses. If this is the second response for an open application and there are still comments outstanding, then please object to the application.

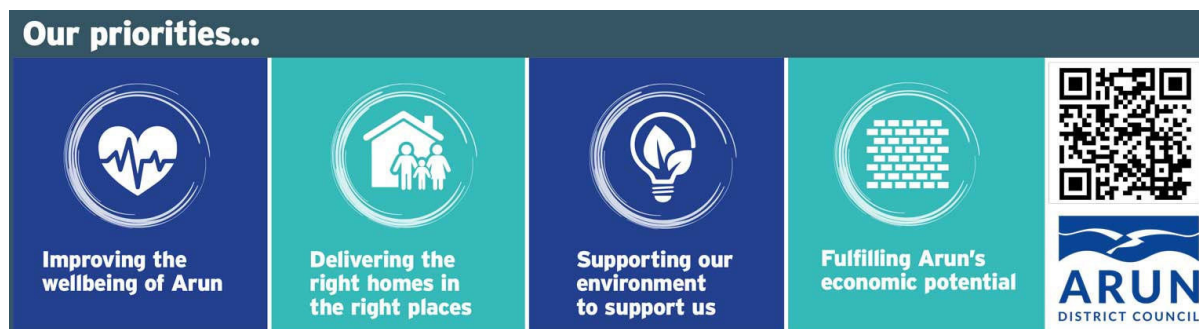
	ADC Drainage Comments	Designer Response			
Date:					
Comment Number					
1.	The application site is larger than 1 hectare and therefore under the NPPF (footnote 63.) a site specific flood risk assessment is required to accompany this application				
2.	As part of the site specific flood risk assessment it is unclear on the impacts of the reduced reservoir capacity on the downstream receiving reservoir, whilst its appreciated that the pump rate of the existing pumping station may not change, the applicant should confirm the change (if any) on the pump volume and the potential impacts this could have to the "downstream" receptor. Confirmation and details of the existing pumping station should also be provided to ensure that the existing pump can cater for the increased discharge volumes				
3.	The proposals need to provide or attenuation storage for the peak design storm event & provide provision for an overflow or outfall to an existing watercourse, in the event that irrigation operations cease during the life of the development.				
4.	The diversion of the existing watercourse will require an Ordinary Watercourse Consent. Please also provide evidence of any positive dialogue in relation to agreements in principle regarding the diversion of this watercourse				

If a designer would like a .docx version of this document to aid administration of responses, please request this by email to land.drainage@arun.gov.uk.

Drainage Engineers response

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

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>

Sent: 18 September 2025 09:19

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

Cc: Sarah Burrow <Sarah.Burrow@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>

Subject: RE: Planning Consultation on: P/40/25/PL

Please find enclosed our external consultants response, an objection.

Regards

Paul Cann

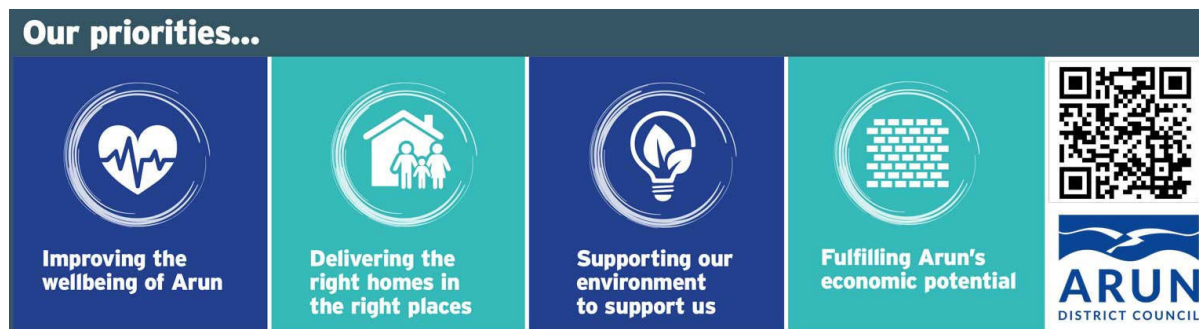
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Littlehampton, West Sussex, BN17 5LF

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

Sent: 25 April 2025 11:34

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: P/40/25/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: P/40/25/PL

Registered: 17th April 2025

Site Address: Sefter Farm Pagham Road Pagham PO21 3PX

Grid Reference: 489092 99743

Description of Works: Erection of warehouse extension and remodelling of existing reservoir. This application is in CIL zone 5 (zero rated) and may affect the setting of a listed building.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 30th May 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Amber Willard

Planning Officer- Arun District Council

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Email: amber.willard@arun.gov.uk

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