

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/40/25/PL	Reviewer Reference:	ADC/EXT4
Planning Officer:	Amber Willard	Date of Review:	05/06/26
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:	3		

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	No objection subject to conditions
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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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No objection subject to conditions
2. Interception drainage	Compliant	No objection subject to conditions
3. Extreme Rainfall and Flooding	Compliant	No objection subject to conditions
4. Water Quality	Compliant	No objection subject to conditions
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	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:

- Technical Note Reservoir Outfall
- DESIGNERS RESPONSE
- Engineers Comments Regarding Surface Water Drainage
- EMAIL 29.4.26 drainage calcs

Consultation comments to the planning officer

0. General

- 0.1. Following further consultation with the application, we are satisfied by the additional supporting information and calculations provided through the assessment of the increased discharge into the existing reservoir that the increase discharge from the site, if any, will be negligible and still compliant with the NSSDS and ADC Drainage Guidance of 3l/s/ha

1. Runoff destination

1.1. The additional information provided in the Technical Note Reservoir Outfall provided further details on the outfall from the roof drainage and the existing reservoir into the Pagham Rife. The proposed runoff from the site will continue to the Pagham Rife as it currently does so.

2. Interception drainage

2.1. The rainwater harvesting provisions provided through the use of this existing reservoir ensures that the interception of the initial rainfall runoff is achieved.

3. Extreme rainfall and flooding

3.1. The calculations provided within the Technical Note Reservoir Outfall demonstrates that the increase in the overall discharge as result of potential increased depth in this reservoir is negligible. Notwithstanding that this is still in compliance with NSSDS and ADC Drainage Guidance, the applicant has demonstrated this in the event of rainwater harvesting operations ceasing which is not envisaged.

4. Water quality

4.1. The current proposals appear to adequately address water quality

5. Amenity

5.1. Based on the additional information provided by the applicant, it is acknowledged the purpose of the proposals are to increase food production facilities and the proposals will benefit in increasing water supplies for the wider needs of this development

6. Biodiversity

6.1. It is noted that the Bio-Diversity Net Gain Report has been submitted with the planning application and that the diverted ditch will be larger than the existing one thus increasing the potential benefits.

7. Construction, operation, maintenance, decommissioning and structural integrity

7.1. Further details have been provided in the Technical Note Reservoir Outfall, and additional details can be secured through condition.

8. Suggested conditions / Overcoming the objection

Prior to the commencement of development, full details of the proposed surface water drainage scheme must be submitted and approved in writing by the local planning authority. The full details submitted for approval shall include:

1. Details of the proposed method and location of surface water disposal, in accordance with the SuDS hierarchy,
2. Impermeable area plan,
3. Calculations modelling the surface water drainage network for the following storm events:
 - a. 100% Annual Exceedance Probability
 - b. 10% AEP + climate change allowance
 - c. 3.3% AEP + climate change allowance
 - d. 1% AEP + climate change allowance

All storm events must include an allowance for urban creep and surcharged outfalls where appropriate,
4. Detailed drainage plans conforming to Local Planning Authority guidance,

5. Specifications for all surface water drainage components and associated infrastructure or flow control mechanisms,
6. Any relevant permissions relating to the discharge location, works to watercourses or adoption of the SuDS scheme.

The scheme shall then be constructed as per the approved plans. The surface water drainage scheme shall remain for the lifetime of the development unless agreed in writing by the local planning authority.

Reason: In order to comply with Arun Local Plan policies W DM3 and the NPPF.

Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Arun Local Plan policies W DM1, W DM2 and W DM3. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.

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

From: Elaine Walby on behalf of Planning.Responses
Sent: 09 June 2026 14:40
To: Planning Scanning
Subject: FW: Planning Consultation on: P/40/25/PL
Attachments: P-40-25-PL - Sefter Farm.docx

PL- Consultation- Engineers response

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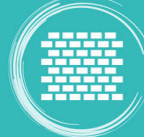
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 05 June 2026 13:11
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Amber Willard <Amber.Willard@arun.gov.uk>
Subject: RE: Planning Consultation on: P/40/25/PL

Please find our consultants response, no objection subject to conditions.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Supporting our environment to support us



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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 05 May 2026 13:34
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 AND COUNTRY PLANNING ACT 1990

Application No:	P/40/25/PL
Registered:	17th April 2025
Site Address:	Sefter Farm Pagham Road Pagham PO21 3PX
Grid Reference:	489092 99743
Category:	Plan Applicat'n
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.

I am able to inform you that I have received an amendment to the above application dated 29th April 2026 relating to:- Additional Reservoir Outfall TN

If you should wish to make further representations as a result of this amendment, please make any further comment by **27th May 2026**.

[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

Amber Willard

Planning Case Officer- Arun District Council

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