

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/40/25/PL	Reviewer Reference:	ADC/EXT4
Planning Officer:	Amber Willard	Date of Review:	17/12/2025
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:	2 of 2		

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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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

Reviewed Plans

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

- Construction Details - Headwalls 513
- Construction Details â?? Drainage 511
- Existing Ditch Details 103
- Flood Risk Assessment v2.0, uploaded in 5 parts via public planning portal
- Surface water drainage checklist
- Construction Details â?? Drainage 512 Rev A
- Construction Details- Surface Finishes 501 Rev A
- Reduced Sized Reservoir 251 A
- Site Layout Proposed Drainage 202 A
- Site Layout Proposed Drainage 201 A
- Existing Site Layout 102 Rev A
- Site Layout Proposed Levels 101 A
- Location plan P001 02
- Proposed floor plan P115 02
- Existing floor plans P110 02
- Composite levels drawing 10417_TP_REV_D

- Proposed elevations P116 03
- Existing elevations P111 03
- Construction details - headwalls 513
- Construction details - drainage 511
- Proposed site layout plan P004 03
- Existing ditch details 103
- Existing site layout 102

Consultation comments to the planning officer

0. General

- 0.1. Whilst the Flood Risk Assessment has been provided with the updated submission documents, our previous concerns remain, largely relating to the offsite impacts which do not appear to be clearly identified. As per our previous comments 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.
- 0.2. 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.
- 0.3. 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
- 0.4. 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
- 0.5. 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

1. Runoff destination

- 1.1. Whilst its understood that the additional run-off will contribute to the existing irrigation reservoir west of the site, the assessment of the additional flows appears to be based on an assumption that the current day water usage will continue throughout the life of the development. This is a risk since the water usage is being directly linked to the attenuation provision for the increased run-off. Should future irrigation needs decline or cease altogether then the proposals will result in surface water flooding both on and offsite. Consideration should be made to the provision of an alternative attenuation provision for this increased runoff from the site as a result of the development. Further details of the western reservoir needs to be provided including the outfall to the existing watercourse. The application boundary may need to be revised to include for the "offsite" attenuation proposals

2. Interception drainage

2.1. The interception of the first 5mm of runoff from the building extension is reliant on the ongoing irrigation needs from the reservoir. If this decreases or ceases over time then interception drainage from the building extension runoff will no longer be achieved. As such alternative measures for interception drainage should be considered.

3. Extreme rainfall and flooding

3.1. Our concerns remain over the operation of the "offsite" reservoir for attenuation of increases surface water discharge from the site. This relies on the assumption that the current day irrigation needs continue; however, should these decline or cease in the future then the site will be prone to flooding and increase the risk of flooding downstream, which currently areas downstream of the site are already within high risks of surface water flooding which would only exacerbate the issue and flood risk

4. Water quality

4.1. The current proposals appear to adequately address water quality

5. Amenity

5.1. The submission does not appear to provide any enhance amenity provision within the SuDS solution

6. Biodiversity

6.1. No assessment has been provided, though the diverted ditch does appear to provide an enhance and larger feature. Further supporting details should be provided

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

7.1. As there is little to no information on the downstream receiving reservoir and no alternative attenuation provisions have been provided, further details on these systems need to be provided to ensure that the proposals do not result in an increase in surface water flooding as a result of potential future decline or ceasing of operations

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.

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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From: Amber Willard <Amber.Willard@arun.gov.uk>
Sent: 22 December 2025 14:14
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: p/40/25/pl

Hi

P/40/25/PL

Please can the attached replace the drainage response uploaded on the 17/12

Thanks

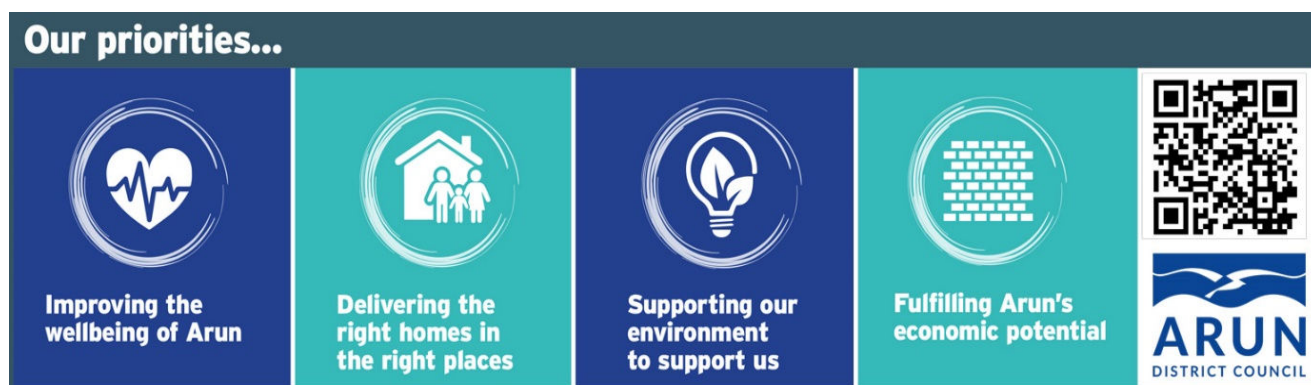
Amber Willard MRTPI
Principal Planning Officer, Planning Department

Tel: 01903 737942

E: amber.willard@arun.gov.uk

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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 22 December 2025 14:07
To: Amber Willard <Amber.Willard@arun.gov.uk>
Subject: FW: p/40/25/pl

Hi Amber

See below – also adjusted consultation sheet.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819

E: paul.cann@arun.gov.uk

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From: Terry Seymour [REDACTED]

Sent: 22 December 2025 13:11

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

Subject: RE: p/40/25/pl

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Hi Paul

Please find attached

In terms of the reason for refusal, per the earlier email, yes that is correct, ultimately the proposals by the applicant give little to no detail on the downstream receptor and rely on rainwater harvesting to deal with the increase of run-off. There is no information on current water demand etc... but the operations on site and whether the downstream reservoir is actually capable of handling this nor is there any information on what would happen should operations cease on site

Kind Regards

TERRY SEYMOUR CEng MICE | MANAGING DIRECTOR



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PERIOD



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From: Terry Seymour [REDACTED]
Sent: 22 December 2025 11:03
To: Paul Cann <Paul.Cann@arun.gov.uk>
Subject: Re: p/40/25/pl

No problem Paul, I will get this back today to you

Sent from [Outlook for Android](#)

From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: Monday, December 22, 2025 10:57:47 AM
To: Terry Seymour [REDACTED]
Subject: FW: p/40/25/pl

Hi Terry

See below – is it possible to provide some additional clarity on this one.

PS. I just realized section 7 is also incomplete.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

T: 01903 737819
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From: Amber Willard <Amber.Willard@arun.gov.uk>
Sent: 22 December 2025 10:26

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

Subject: p/40/25/pl

Hi

We have received another objection for P/40/25/PL. My manager has asked whether it can be confirmed with the consultant who reviewed the application as to whether the below reason for refusal addresses the comments raised as it wasn't entirely clear.

'The applicant has failed to provide sufficient information to determine that the development can sustainably drain surface water. Should irrigation needs at the site decline or cease in the future, it has not been demonstrated that it would not increase flood risk elsewhere. As such, it has not been demonstrated that the development can be adequately drained. This is in conflict with W DM1, W DM2 and W DM3 of the Arun Local Plan and the NPPF.'

Thanks

Amber Willard MRTPI

Principal Planning Officer, Planning Department

E: amber.willard@arun.gov.uk

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