

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/59/25/DOC	Reviewer Reference:	ADC/EXT2/D2134/74
Planning Officer:	Amber Willard	Date of Review:	14.01.2026
Site Name:	Sefter Farm Pagham Road Pagham PO21 3PX		
Application Description:	Approval of details reserved by condition imposed under reference P/117/21/PL relating to condition number 7 - surface water drainage scheme.		
Assessment Number:	1 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	Condition 7: No 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The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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 result in an **objection** to any application to discharge a surface water drainage design condition.

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.

All relevant items on the checklist are expected to be met before an application to discharge an application to discharge a SuDS design condition is supported.

Our response and requirements are elaborated upon or condensed within an attached comment tracker where necessary. If a comment tracker is provided a designer is encouraged to refer to this and respond to comments to aid further review. Please request a .docx version of this document to by email to land.drainage@arun.gov.uk if needed.

Standard	Assessment	Response
1. Runoff destination	Compliant	No objection
2. Interception drainage	Compliant	No objection
3. Extreme Rainfall and Flooding	Compliant	No objection
4. Water Quality	Compliant	No objection
5. Amenity	Compliant	No objection
6. Biodiversity	Compliant	No objection
7. Construction, operation, maintenance, decommissioning and structural integrity	Compliant	No objection

Reviewed Plans

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

- Interim Drainage Management and Maintenance Plan v1.1
- EMAIL 11.12.25 subplans
- Site Layout - Proposed Drainage - Sheet 1 Drg. No. 201, uploaded in 3 parts via the public planning portal
- Site Layout - Proposed Levels - Sheet 1 Drg. No. 301, uploaded in 2 parts via the public planning portal
- Proposed Site Sections - Sheet 1 Drg. No. 311, uploaded in 2 parts via the public planning portal
- Construction Details - Headwalls Drg. No. 512
- Construction Details Surface Finishes 501B
- Surface Water Drainage Statement v1.0
- Full Detailed Surface Water Drainage Design Checklist

Condition wording

Condition 7 is worded as follows:

“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a precommencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works”

Consultation comments to the planning officer

1. Please see the attached comment tracker for detailed comments relating to the submission.

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

Application Reference: P/59/25/DOC Site Name: Sefter Farm Pagham Road Pagham PO21 3PX	Initial Issue Date: 14.01.2026 Issue Date: 14.01.2026 Reviewer Reference: ADC/EXT2/D2134/74
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Summary and Recommendation:

Condition 7: **No 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	ADC Drainage Comments	Designer Response	ADC Drainage Comments	
Date:	08/08/2025	12/11/2025	04/12/2025	14/01/2026	
Condition Number: 7					
Comment Number					
1.	Please provide a copy of FRA supplied at planning stage as this was not included in your submission. This is required to correlate conclusions and geotechnical testing. Designer Response 26/08/2025 Copy of original FRA attached.	Noted. Comment closed.			
2.	Geotechnical evidence for groundwater monitoring between Sept 24 – Mar 24 covers a full winter period, is accepted. We concur that infiltration techniques are unsuitable.	Noted. Comment closed.			

	Designer Response 26/08/2025 Agreed. No further action required.				
3.	The drainage statement include 'proposed site layout and drained areas plan 03' which is accepted. However for completeness please provide similar drawing denoting the 'existing layout' and impermeable/semipermeable areas. Designer Response 26/08/2025 It is unclear why this is being requested. The proposed external surface is being increased by the development proposals. The design is based on those increased areas. Pre development runoff calculations are based on greenfield equivalent flows not the pre developed impermeable areas. This request is of no relevance to the site going forward and does not provide any useful information relating either to the approved planning	Noted. Plan 07 is sufficient. Comment closed.			

	permission or to the detailed design of the surface water drainage system We attach Plan 07 noting the current layout of the site and the current surfaces.				
4.	The QBAR rates are representative of the developed area being positively drained and are accepted. Designer Response 26/08/2025 Agreed. No further action required.	Noted. Comment closed.			
5.	Engineering drawing must show 3.0m buffer zone for all existing watercourses, including conveyance channels to consider access for maintenance and development impacts. Designer Response 26/08/2025 All existing watercourses and open channels are within the ownership of the site operator and have always been and will continue to be maintained from the top of bank. The conveyance channel is the only open feature that this could impact and is located next to the main concrete access road.	Noted. Comment closed.			

	Plan 251 submitted with the application indicates the 3m buffer for the realigned section. We also attach plan 102 B revised to indicate a 3m buffer to the existing conveyance channel.				
6.	FEH data highlights a significant upstream catchment of the order of 15.84km² associated with the Main River. Does the FRA identify the risks or is the local topography / elevation such that there is no potential impacts to the site being inundated? Designer Response 26/08/2025 The development does not change the upstream catchment. There is no increased risk from the development proposals either to or from the upstream catchment. The development does not seek to provide flood alleviation for the wider catchment area. The Original Flood Risk Assessment is attached. Flood Risk was determined as part of the Outline Planning Application.	We concur with the findings of the FRA. Comment closed.			

7.	The syphonic roof strategy is noted to be designed by others, please provide some further information to verify that there will be no connections and/or potential breach of this system which may inundate the other SW drainage networks. Noting parts of this network will be 'above ground', how will this link to the reservoir tank? Designer Response 26/08/2025 The roof drainage will be a sealed syphonic system. There is no link between the syphonic system and the gravity drainage system. Syphonic drainage by definition is a sealed system and is not unusual for large roof areas. The pipe work will be underground from the RWP positions to the bank of the reservoir where the pipework will come above ground over the bank of the reservoir and discharge directly into the reservoir. The syphonic system will allow the water to be lifted	Noted. Please ensure full details of the 3rd party design are provided. In addition please ensure any bespoke requirements for this system are included with the drainage management and maintenance plan. Comment closed.			
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	over the bank of the reservoir.				
8.	Noting the proximity to the Main River and aforementioned 'catchment', is there data in respect of the Main River peak water levels covered in the FRA and is there a potential risk of backing up/surcharge which may affect the conveyance channel outfall? Designer Response 26/08/2025 Please see the Flood Risk Assessment, copy attached. The FRA was approved at Planning and as such the flood risk to the site (or in this case lack of flood risk) as been defined and accepted. The FRA notes the site wholly in Flood Zone 1. The outfall of the conveyance channel will therefore not be subject to any potential risk of backing up / surcharge.	We concur with the findings of the FRA. Comment closed.			
9.	Whilst the proposed yard and permeable parking are proposed to be laid very flat, the site sections nor surface finishes highlight any boundary	Noted, however the edge restraint/support must be fit for purpose i.e vehicular loading along the edge.	We have included further detail of the EF edging at the edge of the	Noted. Comment closed.	

	kerbs/edging which may have a role in controlling run-off, please confirm. Designer Response 26/08/2025 The permeable paving is to be constructed over voided subbase which by definition is constructed below ground level. No edgings are required to retain below ground storage, impermeable membrane is noted on the Construction Details Surface Finishes Drawing 501 submitted with the application and copy attached. The membrane is shown at the base and the edges of the permeable stone to retain the surface water within the system below ground. There are also edgings shown where relevant on the surface finishes detailed design drawings submitted with the Discharge of Conditions application. Please see Surface Finishes Drawings 24019-401 and 24019-402, copies attached.	The construction details on 501 must be updated to demonstrate how the edging will be installed to the outer edges permeable pavement. Comment outstanding.	permeable pavement construction. See Drawing 501B.		
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10.	Please provide supplier details/quotes for all flow control devices/sump requirements. Designer Response 26/08/2025 All flow controls are orifice plates. These can be sourced from a multitude of suppliers. There are no hydroborates or bespoke flow control devices propose on this scheme. Flow control manhole construction details have been added to Drawing 511 C, copy attached	National Standards advises '3.22 Where the peak allowable discharge rate requires flow controls with orifices (or equivalent) with a diameter of less than 50mm, the flow control shall be robustly protected from blockage risks. Regardless of this, the risk of blockage for all flow controls shall be assessed and mitigated against' The bespoke flow control details on drawing 511, with 40mm size are a relaxation to the above clause and therefore the designer must clarify on how the risk of block has been assessed and mitigated. This may also require further clarification for maintenance. Comment outstanding.	The orifice plates provided are restricting flows from voided stone beneath either permeable paving or concrete slabs with upstream catchpits and distribution tanks, each system collects surface water from the voided stone in fin drains which have a permeable membrane surround. There is no risk of any material of sufficient size passing through the permeable stone or membrane surrounding the fin drains and reaching or blocking any of the proposed orifice plates. The orifice plates are therefore robustly protected from any potential blockage risk. The locations of the office plates are indicated on drainage drawings 201 and 202 as previously submitted.	Noted. Comment closed.	
11.	Permeable pavement construction details must be updated to qualify kerbs/edgings Designer Response 26/08/2025	Please see response to comment 9 above. Comment outstanding.	We have included further details of the EF edging at the edge of the permeable pavement construction.	Noted. Comment closed.	

	As previously noted: There are edgings shown where relevant on the surface finishes detailed design drawings submitted with the Discharge of Conditions application. Please see Surface Finishes Drawings 24019-401 and 24019-402		See Drawing 501B.		
12.	Flow control manhole construction details are required Designer Response 26/08/2025 Flow control manhole construction details have been added to Drawing 511 C, copy attached.	Noted. Comment closed.			
13.	Please provide any detailing for proposed landscaping and/or planting, or advise otherwise if nothing is planned for the remaining soft areas. Designer Response 26/08/2025 Nothing planned.	Noted. Comment closed.			
14.	Whilst water quality is suitably covered in the report, this does not clarify the anticipated daily movements for the commercial yard and/or if vehicle washdown will occur. Higher use or other may require additional apparatus.	Noted. Comment closed.			

	Designer Response 26/08/2025 We agree that water quality is suitably covered in the submission. Water quality for the proposed risk has been provided.				
15.	Whilst the calculation criteria is accepted, please provide a supporting node/pipe drawing (or extract from FLOW) to enable full review and verify inverts match the design. Designer Response 26/08/2025 This information has already been supplied. The flow calculations submitted in Appendix 5 of the Drainage Statement clearly identifies the relevant invert levels. These are the same as those shown on the detailed drawing in the same appendix. IL 4.31 at Service Yard IL 4.90 at External Works IL 5.31 at Car Park	Noted. Calculations have been reviewed. It is noted that half drain down times are greater than 24hrs. Comment closed.			
16.	Whilst we concur trickle flow rates can be accepted for permeable paving based systems, the potential risk of small solid handling openings	Please review in conjunction with comment 9 and compliance with National Standards.	See responses to 9 and 10 above.	Noted.	

	must also be considered vs the half drain down times. This shall be reviewed where orifice sizes fall below 50mm as currently specified, however this may be mitigated 'by design' and maintenance strategy so please consider when providing further construction details of the flow controls. Designer Response 26/08/2025 The orifice plates proposed are: 40mm at Service Yard 44mm at External Works 40mm at Car Park The potential risk of small solid handling openings has been considered vs the half drain down times to provide a balance approach. Half drainage times for the 1:100 year +45% event) assuming zero infiltration are confirmed as follows for the proposed Qbar runoff of 1.1l/s and Q100+45 runoff of 2.2l/s. 2,640 minutes at Service Yard 3,270 minutes at External Works 2,880 minutes at Car Park This balance between restricted discharge and resultant risk of blockage is considered	It is noted that half drain down times are greater than 24hrs.	Half Drain times are greater than 24 hours, there is no requirement to half drain non infiltration systems. The Half Drain times have been considered as previously noted in response to comment 17.	Half drain times must be considered for all types of system to appraise the risks of subsequent rainfall events. On review of the cited durations and gross plan flat pavements offering buffer storage, this site is considered to be low risk. Comment closed.	
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	appropriate. Flow control manhole construction details are attached which show sumps to allow silt removal if any fines manage to permeate the proposed voided subbase.				
17.	A maintenance report has been provided, however this requires further updates to comply with the PCENG4 Checklist. Designer Response 26/08/2025 Maintenance is being undertaken by the existing site operator as is the case with all other onsite drainage. Can the Council confirm specifically what additional information they require? It is noted that many of the requirements of PCENG4 cannot be met until a contractor is appointed. A contractor cannot be used appointed until approval is received. As much information as can reasonably be provided at this stage has been submitted.	Advisory comment closed, please see below for requirements.			
18.	A plan showing maintenance responsibility	Noted,	The Submitted Drainage Plans 201,	Noted.	

	must be included within the maintenance manual. Plans are included where appropriate showing how SUDS features and watercourses are accessed for maintenance purposes. Designer Response 26/08/2025 All features on site are owned and operated by the existing site operator. All open features are accessed from top of bank as is the existing case.	However ADC policy dictates a bespoke plan must be included. Comment outstanding.	202 and 203 detail the drainage system and are bespoke to the site. The site is owner operated and therefore all drainage features are maintained. These plans have been added to the rear of the Interim Drainage Management and Maintenance Plan v1.1	Comment closed.	
19.	The approved design drawings must be included in the document. Designer Response 26/08/2025 These can be included once approval has been received.	Agreed. Comment closed.			
20.	The report must ensure there are clear details of who to contact if the surface water drainage system is not functioning correctly. Designer Response 26/08/2025 The report notes the Maintenance Team are to be	Agreed. Please ensure the revised report includes the contact details under 9.3. Comment outstanding.	Noted, Section 9 the Interim Drainage Management and Maintenance Plan v1.1 updated with the contact number and instructions.	Noted. Comment closed.	

	contacted. The site is in one ownership and the existing site owner's maintenance team will be maintaining the system.				
21.	There is no action plan for dealing with accidental spillages of pollutants. Designer Response 26/08/2025 There are no pollutants anticipated. No fuel or chemicals are stored on site. There is no requirement for this in the existing planning permission.	Please include a section in the revised report to cover this. Whilst it may be a very low risk how will the management team deal with a minor or serious spillage, safe guard the system, deal with any contaminated waste. Comment outstanding.	As previously noted there are no pollutants anticipated. No fuel or chemicals are stored on site. There is no requirement for this in the existing planning permission. We have added a section on dealing with accidental spillages or pollutants to Section 9 of the Interim Drainage Management and Maintenance Plan v1.1 to allow this comment to be removed.	Noted. Comment closed.	
22.	There is no advice provided as to what to do if alterations are to be made to the development or, works are to be carried out which may affect the surface water drainage system.	Please qualify in the revise report where any future alterations and/or services run through the permeable paving, the permeable paving will be reinstated above and/or compensated accordingly under guidance of a	As previously noted none are proposed nor required. There is no requirement for this in the existing planning permission.	Noted. Comment closed.	

	Designer Response 26/08/2025 None are proposed nor required. There is no requirement for this in the existing planning permission.	specialist.	We have added a note to Section 8 of the Interim Drainage Management and Maintenance Plan v1.1 to allow this comment to be removed.		
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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.

PL- Consultation- Engineers response

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>

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 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 Our core foundations	 
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From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 14 January 2026 13:58
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 Re-Consultation on: P/59/25/DOC

Please find enclosed our consultants response recommending discharge of condition.

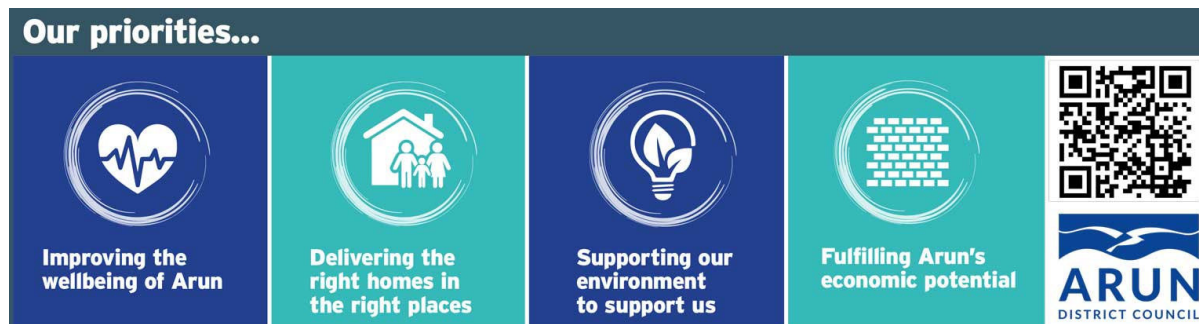
Regards

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

Sent: 15 December 2025 12:19

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

Subject: Planning Re-Consultation on: P/59/25/DOC

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: P/59/25/DOC
Registered: 7th May 2025
Site Address: Sefter Farm Pagham Road Pagham PO21 3PX
Grid Reference: 489092 99743
Category: Discharge of Condi
Description of Works: Approval of details reserved by condition imposed under reference P/117/21/PL relating to condition number 7 - surface water drainage scheme.

I am able to inform you that I have received an amendment to the above application dated 11th December 2025 relating to: Substitute drainage info and plans

If you should wish to make further representations as a result of this amendment, please make any further comment by **31st December 2025**.

[Click here to view the application, documents and make further 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.

Yours sincerely

Amber Willard

Planning Case Officer-Arun District Council

Telephone: 01903 737942

Email: amber.willard@arun.gov.uk

PLRECON_DOC (ODB) 2020