

Engineers Comments Regarding Surface Water Drainage

Application Reference:	P/76/26/PL	Reviewer Reference:	ADC/EXT4b
Planning Officer:	Amber Willard	Date of Review:	15/09/2026
Site Name:	Sefter Farm Pagham Road Pagham PO21 3PX		
Application Description:	Construction of a new engineering block building and car parking areas together with a new access road, footpaths and hard standing area. This application may affect the setting of a listed building and is in CIL Zone 5 (Zero Rated) as other development.		
Assessment Number:	1		

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 The NsTS have been superseded by the National Standards for Sustainable Drainage Systems [NSfS] from 19 June 2025.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	Compliant	No 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	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:

- SITE LAYOUT DRAINAGE ENTIRE SITE 200
- SITE LAYOUT DRAINAGE SHEET 1 201
- SITE LAYOUT DRAINAGE SHEET 2 202
- LOCATION PLAN P001 REV05
- ESTATE PLAN P002 REV05
- CONSTRUCTION DETAILS DRAINAGE 511
- CONSTRUCTION DETAILS HEADWALLS 512
- CONSTRUCTION DETAILS HEADWALLS 513
- SITE LAYOUT LEVELS ENTIRE SITE 300
- SITE LAYOUT LEVELS SHEET 1 301
- SITE LAYOUT LEVELS SHEET 2 302
- CONSTRUCTION DETAILS SURFACE FINISHES 501
- SITE LAYOUT SURFACE FINISHES SHEET 1 401
- SITE LAYOUT SURFACE FINISHES SHEET 2 402
- FRA AND DRAINAGE STATEMENT Part 1-3
- INTRIM DRAINAGE MANAGEMENT AND MAINTENANCE PLAN

Plans/Documents to be listed as approved

The following plans/documents should be listed as approved:

- N/A

Consultation comments to the planning officer

0. General

- 0.1. The application is for a new engineering building, car park and access road, together with landscaping and alterations to the existing irrigation reservoir.
- 0.2. Whilst the building is 960 sqm, the application site area is over 1ha and the application is therefore major development with reference to Development Management Procedure Order 2015.
- 0.3. In accordance with NPPF paragraph 182 the development must meet all minimum operations standards for sustainable drainage and take account of advice from the LLFA. We therefore recommend the LLFA is consulted.
- 0.4. The site is close to a main river and is with a future year flood zones. The Environment Agency should be consulted for advice on flood zones and flood risk from rivers and seas. Future flood depths should be considered with regards to potential flood mitigation.

1. Runoff destination

- 1.1. There is an irrigation demand at the site and the drainage strategy includes provision to convey runoff to an existing above ground irrigation reservoir. This is via mechanical pumping and while mechanical pumping is noted to be avoided unless necessary in the NSfS, the system is not reliant upon the pumping to avoid failure or flooding and it is common for pumps to be used to transfer water for irrigation at this type of farm operation. The use of pumping to convey flow to the reservoir is therefore acceptable for this application. The provision for reuse of rainwater is acceptable.
- 1.2. Ground investigations confirm that the site is not suitable for discharge to ground via infiltration owing to high winter groundwater (within 700mm of the surface). This is in line with our experience and understanding of the location.
- 1.3. An outlet to the existing watercourse to the south, which is an ordinary watercourse and tributary of the Pagham Rife main river, is also proposed. The basis of the proposed outlet that whilst the operational intention is to reuse the runoff water, water reuse is not guaranteed as the pumps required to convey the runoff to the irrigation reservoir may not operate or the reservoir may be full.
- 1.4. The additional outlet to a watercourse is acceptable on the basis it is downstream of flow controls and would only occur if the reservoir is full or otherwise inoperable, which therefore replaces the requirement for an overflow.

2. Interception drainage

- 2.1. Surface water runoff does not discharge to ground via infiltration as this is precluded by the ground conditions / high ground water. Interception drainage is provided in the design by permeable pavement, swales and water reuse.
- 2.2. The permeable pavement is acceptable for the self-drained area. Calculations should be provided to confirm that the remaining positively drained area meets NSfS criteria (this is likely to be met with calculations in accordance with BS EN 16941 for rainwater harvesting).
- 2.3. Interception drainage is not currently demonstrated to be in accordance with the requirements of the NSfS Standard 2. Therefore, we **object** to the application.

3. Extreme rainfall and flooding

- 3.1. The latest national surface water flood modelling data set ('Surface Water Spatial Planning') appears to indicate areas of surface water flood risk at the site, possibly in the location of the new building. The FRA should be updated to show the latest surface water risk areas to the site against the proposed development layout and assess the risk of external surface water flooding to the development or drainage system.
- 3.2. Calculations are provided which indicate the design storm can be contained within the permeable pavement voided subbase stone layer without flooding. However, the subbase of the footpaths has been calculated with a porosity of 1. This needs to be corrected as the model currently assumes open storage within the subbase of the footpaths, when in fact it is a 30% voided subbase.
- 3.3. The design peak outflow rate of 2.8 litres per second is based upon 3l/s/ha applied to the drained area and is in accordance with the NSfS.
- 3.4. There is an area of existing access road within the red line boundary which is an existing drained area and can be omitted. The swales and irrigation reservoir are excluded from the drained areas which is acceptable as the swales are downstream of the flow controls are conveyance only and can replicate greenfield runoff of the previous greenfield land, the irrigation reservoir is a pre-existing facility downstream of the flow controls.
- 3.5. However, there is an area of subbase storage to the east of the car park which should be clarified whether the area will remove topsoil and should be included in the drained area. There is also a smaller area linking the existing and new access road which should be included in the calculations.
- 3.6. The watercourse may cause backflow into the swale during the design storm and an assessment of potential for downstream surcharge should be provided for the downstream condition during the lifespan of development. This can be based upon the 2070 national surface water flood modelling or other robust assumption.
- 3.7. Management of extreme rainfall is not currently in accordance with the requirements of the NSfS. Therefore, we **object** to the application.

4. Water quality

- 4.1. The design includes permeable pavement car parking, all upstream runoff the drained through the permeable paving subbase layer, and the swales. The assessment of water quality mitigation is in accordance with the SuDS Manual Simple Index Approach and is therefore acceptable.

5. Amenity

- 5.1. As a major development, NSfS requires that the SuDS Approach maximises benefits for amenity through the creation of multi-functional places and landscapes.
- 5.2. Other than the use of permeable pavement, no assessment is provided on the amenity aspect for the sustainable drainage system. A more thorough assessment should be provided to set out how the drainage system addresses Standard 5.
- 5.3. Amenity is not currently demonstrated to be in accordance with the requirements of the NSfS (Standard 5). Therefore, we **object** to the application.

6. Biodiversity

- 6.1. The NSfS and ADC guidance requires that a site-specific biodiversity risk and opportunity (BRO) assessment is used to ensure biodiversity is considered from the outset of the design. The biodiversity report should demonstrate how biodiversity is enhanced by the SuDS design.
- 6.2. Currently the Ecology reports do not assess the mitigation or specific design proposed for the biodiversity aspect of the sustainable drainage system.
- 6.3. Water quality mitigation is not currently demonstrated to be in accordance with the requirements of the NSfS (Standard 6). Therefore, we **object** to the application.

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

- 7.1. An interim management and maintenance plan is submitted with the planning application. The site is within one ownership and management would be undertaken by the site operator, added to an existing drainage system and maintenance responsibility.
- 7.2. A detailed maintenance plan can be a requirement of a planning condition. Specific maintenance requirements will need to be included for all aspects including permeable paving, flow control device, pumping station, swales and headwalls.

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

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

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<https://www1.arun.gov.uk/planning-application-finder>



From: Paul Cann <Paul.Cann@arun.gov.uk>
Sent: 21 September 2026 13:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Land Drainage <Land.Drainage@arun.gov.uk>; Hebe Smith <Hebe.Smith@arun.gov.uk>
Subject: RE: Planning Consultation on: P/76/26/PL

Please find enclosed our consultants response, an objection.

Regards

Paul Cann
Principal Drainage Engineer, Coastal Engineers and Flood Prevention

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Our priorities...



Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 04 June 2026 11:04
To: Land Drainage <Land.Drainage@arun.gov.uk>
Subject: Planning Consultation on: P/76/26/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/76/26/PL**

Registered:	3rd June 2026
Site Address:	Sefter Farm Pagham Road Pagham PO21 3PX
Grid Reference:	489092 99743
Description of Works:	Construction of a new engineering block building and car parking areas together with a new access road, footpaths and hard standing area. This application may affect the setting of a listed building and is in CIL Zone 5 (Zero Rated) as other development.

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 9th July 2026 . 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

Hebe Smith

Planning Officer- Arun District Council

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Email: hebe.smith@arun.gov.uk

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