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**From:** Richard Goodall [REDACTED]  
**Sent:** 21 August 2026 14:06  
**To:** Amber Willard <Amber.Willard@arun.gov.uk>  
**Subject:** Barfoots Engineering Block

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Amber,

As a PS to my earlier email, I attach a note prepared by our drainage engineer which I trust will assist you and potentially allow you to move this on (favourably) in the event that you do not hear from your drainage consultant in a timely way.

Regards

--  
Richard Goodall  
[Advoco Planning](#)  
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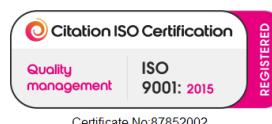
# Planning Note - Flood Risk and Drainage



|                       |                                                                    |
|-----------------------|--------------------------------------------------------------------|
| <b>Project</b>        | Proposed Engineering Block and Car Park, Sefter Farm, Bognor Regis |
| <b>Project Number</b> | 24125                                                              |
| <b>From</b>           | Stuart Magowan IEng MICE                                           |
| <b>Subject</b>        | Flood Risk and Drainage Planning Compliance                        |
| <b>Date</b>           | 20 August 2026                                                     |

## 1 Introduction

- 1.1 This Planning Note has been prepared by The Civil Engineering Practice on behalf of Barfoots of Botley in support of the planning application for the construction of a new engineering block building and car parking areas, together with a new access road, footpaths and hardstanding area at Sefter Farm, Pagham Road, Bognor Regis, West Sussex.
- 1.2 The purpose of this Planning Note is to confirm, by reference to the submitted Flood Risk Assessment and Drainage Statement v1.1 and the submitted approval drawings, why there is no substantive drainage, flood risk or sustainable drainage system (SuDS) basis on which planning permission should be refused.
- 1.3 This Note has been prepared following review of the following submitted documents:
  - Flood Risk Assessment and Drainage Statement Version 1.1 (Parts 1 to 3);
  - Drawing 101 – Proposed Site Layout and Red Line Boundary Plan;
  - Drawings 200, 201 and 202 – Site Layout Drainage;
  - Drawings 300 and 301 – Site Layout Levels;
  - Drawing 311 – Proposed Site Sections;
  - Drawings 400, 401 and 402 – Site Layout Surface Finishes;
  - Drawing 501 – Construction Details, Surface Finishes;
  - Drawing 511 – Construction Details, Drainage;
  - Drawings 512 and 513 – Construction Details, Headwalls.
- 1.4 The submitted information demonstrates that the development has been designed in accordance with the National Planning Policy Framework (NPPF), the National Standards for Sustainable Drainage Systems (2025 Update), Arun Local Plan Policy W DM3, CIRIA C753 The SuDS Manual and the requirements of West Sussex County Council as Lead Local Flood Authority (LLFA).
- 1.5 The evidence provided confirms that the development is safe for its lifetime, will not increase flood risk elsewhere, incorporates sustainable drainage measures and delivers wider water quality, amenity and biodiversity benefits.



## **2 Compliance with NPPF Flood Risk and Drainage Requirements**

2.1 The following section addresses the flood risk and drainage requirements of the NPPF structured as points F1 to F9 and confirms compliance in each case.

### **2.2 F1 – Development Directed Away from Areas at Risk of Flooding**

2.2.1 The site lies wholly within Flood Zone 1 and therefore occupies land with the lowest probability of flooding. The FRA confirms the site is located within Flood Zone 1, is not at fluvial flood risk and is not at risk from reservoirs.

2.2.2 Future climate change mapping indicates only limited future tidal influence by 2115, with the development remaining appropriate in flood risk terms. The proposal therefore fully accords with the core NPPF objective of directing development to areas of lowest flood risk.

### **2.3 F2 – Appropriate Use and Vulnerability Classification**

2.3.1 The development comprises agricultural and commercial infrastructure serving an existing agricultural enterprise and is classified as 'Less Vulnerable' development. The FRA correctly identifies that such development is appropriate within Flood Zone 1 and is compatible with future flood risk classifications.

### **2.4 F3 – Flood Risk Assessment Demonstrates Safety**

2.4.1 The FRA provides a site-specific flood assessment, a review of Environment Agency flood mapping, a review of the Arun Strategic Flood Risk Assessment, and surface water, groundwater, climate change and exceedance flow routing assessments. The submitted evidence demonstrates the development will remain operational and safe during extreme rainfall events.

### **2.5 F4 – Sustainable Drainage Systems Incorporated**

2.5.1 The proposed drainage strategy follows the National Standards hierarchy through rainwater harvesting and reuse, storage within permeable pavement systems, and controlled discharge to the watercourse only when required. The scheme treats rainfall as a resource rather than a waste, in accordance with current NPPF and SuDS guidance.

### **2.6 F5 – Climate Change Consideration**

2.6.1 The drainage calculations have been undertaken up to the 1 in 100 year event plus a 45% climate change allowance. The critical event demonstrates a maximum stored volume of approximately 969m<sup>3</sup> with no recorded flooding (flood volume = 0m<sup>3</sup>) and the Hydrobrake restricted discharge maintained at 2.8 l/s. This exceeds current policy requirements.

### **2.7 F6 – Flood Risk Elsewhere Not Increased**

2.7.1 The development discharges at a restricted rate of 2.8 l/s, in accordance with the National Standards requirement to limit discharge to 3 l/s/ha or the greenfield equivalent where lower. The proposed Hydrobrake control and attenuation storage ensure that post-development runoff does not increase downstream flood risk.

## 2.8 F7 – Surface Water Managed on Site

- 2.8.1 The submitted design incorporates permeable parking areas, voided stone attenuation, permeable footpaths, swale conveyance, flow control and reservoir reuse. The scheme therefore follows best practice source control principles, managing rainfall as close to source as practicable.

## 2.9 F8 – Residual Risk Safely Managed

- 2.9.1 The proposed exceedance strategy demonstrates that flooding is contained within the parking areas, controlled routing is provided to the eastern swale and overflow discharge is directed safely towards the tributary of the Pagham Rife. Residual flood risk is therefore managed appropriately in accordance with NPPF requirements.

## 2.10 F9 – Long-Term Management and Maintenance

- 2.10.1 A detailed drainage maintenance and management plan has been submitted including catchpit inspections, swale maintenance, permeable paving inspections, channel drain maintenance, flow control maintenance, emergency procedures and long-term ownership responsibilities. This fully satisfies NPPF lifetime maintenance expectations.

# 3 Compliance with National Standards for Sustainable Drainage (2025)

## 3.1 Standard 1 – Runoff Destinations

- 3.1.1 The scheme follows the approved hierarchy by prioritising rainwater reuse through the irrigation reservoir before any discharge to the receiving watercourse. Fully compliant.

## 3.2 Standard 2 – Everyday Rainfall (Interception)

- 3.2.1 The extensive permeable pavements and voided sub-base storage provide interception storage for the first 5mm of everyday rainfall events. Fully compliant.

## 3.3 Standard 3 – Extreme Rainfall and Flooding

- 3.3.1 Calculations demonstrate storage for the 1% AEP event including a 45% climate change allowance, with no flooding within the design events and appropriate exceedance routing beyond the design event. Fully compliant.

## 3.4 Standard 4 – Water Quality

- 3.4.1 The treatment train comprises permeable pavement, swale conveyance and catchpit and sump systems with controlled outfall arrangements. The FRA demonstrates that the pollutant mitigation indices exceed the required pollution hazard indices. Fully compliant.

## 3.5 Standard 5 – Amenity

- 3.5.1 The drainage system provides genuine multifunctional space through the parking areas also acting as attenuation storage and water quality mitigation whilst the landscaped swale corridor provides an improved visual quality compared with traditional piped drainage. This delivers measurable amenity benefit. Fully compliant.

### 3.6 Standard 6 – Biodiversity

- 3.6.1 The proposed swale creates a new vegetated linear habitat and ecological corridor. The FRA explicitly identifies biodiversity benefits associated with the swale system, which has been assessed within the Imprint Ecology Limited report. Fully compliant.

### 3.7 Standard 7 – Construction, Operation and Maintenance

- 3.7.1 Detailed construction details, inspection frequencies, maintenance schedules and operational procedures have been supplied across the submitted drawings and the interim drainage management and maintenance plan. Fully compliant.

## 4 Compliance with Arun Local Plan Policy W DM3

- 4.1 Policy W DM3 (Sustainable Urban Drainage Systems) of the Arun Local Plan 2011–2031 requires SuDS to satisfy a series of criteria. Compliance is confirmed as follows:

| Ref | Policy Requirement                         | How the Scheme Complies                                                                                                                                                                 |
|-----|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a)  | Positively contribute to appearance        | The proposed swale and permeable landscape drainage integrate positively into the site.                                                                                                 |
| b)  | Effectively manage water and water quality | Hydraulic calculations and a robust treatment train demonstrate compliance.                                                                                                             |
| c)  | Enhance biodiversity                       | The swale and associated vegetated corridor deliver biodiversity enhancement.                                                                                                           |
| d)  | Provide amenity                            | Drainage is integrated into usable surfaces creating multifunctional spaces together with the improved visual quality enhancement provided by the swale alongside the pedestrian route. |
| e)  | Retain drainage function                   | Surface water continues to be directed to the existing receiving environment via improved infrastructure.                                                                               |
| f)  | Maintenance in perpetuity                  | A Maintenance and Management Plan has been provided.                                                                                                                                    |
| i)  | No flooding in 1 in 30 year event          | Submitted modelling confirms no flooding.                                                                                                                                               |
| j)  | 1 in 100 year + climate change storage     | Calculations confirm no flooding with 969m <sup>3</sup> of storage available.                                                                                                           |

## 5 Conclusions

- 5.1 The submitted FRA, drainage calculations and engineering drawings demonstrably satisfies the National Planning Policy Framework flood risk requirements (F1 to F9), the National Standards for Sustainable Drainage Systems, CIRIA C753 The SuDS Manual, Arun Local Plan Policy W DM3 and the requirements of West Sussex County Council as LLFA.
- 5.2 In summary, the development:
- Is located in Flood Zone 1 and is appropriate development for its flood risk classification;
  - Does not increase flood risk elsewhere and restricts runoff to a greenfield-equivalent rate of 2.8 l/s;
  - Provides attenuation for the 1:100 year plus 45% climate change event with no flooding;
  - Incorporates a robust SuDS treatment train delivering water quality, amenity and biodiversity benefits;
  - Includes exceedance routing and long-term maintenance provisions;
  - Provides substantial rainwater reuse through the irrigation reservoir system.
- 5.3 Accordingly, there is no technical flood risk, drainage or SuDS planning basis upon which planning permission should be refused.
- 5.4 The submitted drainage strategy should be considered policy compliant and acceptable, and the application should be approved.