

Simon Davis

From: Darryl Howells [REDACTED]
Sent: 08 May 2026 09:20
To: Simon Davis
Subject: FW: Action Please - Bogner site - FW: Acknowledgement for BE/15/26/PL

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Hello Simon

Please find attached the amended plan removing the visitor spaces.

We have already granted the extension of target date.

The National Planning Policy Framework (NPPF, December 2024) confirms that where development is proposed within Flood Zones 2 or 3, the Exception Test must demonstrate that:

1. the development provides wider sustainability benefits to the community that outweigh flood risk; and
2. the development will be safe for its lifetime without increasing flood risk elsewhere and, where possible, reduce flood risk overall.

In this case, both parts of the Exception Test are satisfied. The application is supported by a Surface Water Drainage Strategy (SWDS) which incorporates Sustainable Drainage Systems (SuDS) designed to replicate greenfield runoff rates and provide an overall betterment compared to the existing situation.

In relation to the first limb of the test, the proposal will deliver 8no. new dwellings within the built-up area boundary of Bognor Regis in a highly sustainable location. Arun District Council can currently demonstrate only a 3.41-year housing land supply and therefore the delivery of additional housing attracts substantial weight in favour of the development. The provision of smaller 1- and 2-bedroom units would contribute towards identified local housing needs, including accommodation for first-time buyers, downsizers and smaller households.

The proposal also delivers a direct environmental benefit through improvements to floodplain capacity. The undercroft parking area has been specifically designed below existing ground levels in order to introduce additional land into the active flood storage regime. Independent Flood Compensation Storage calculations prepared by Aegaea (Ref: AEG5966, May 2026) confirm a net gain in floodplain storage of 125.45m³ on a level-for-level basis up to the 1-in-1000-year flood event. The development therefore not only mitigates its own impact but provides a measurable betterment to floodplain conditions within the wider catchment area.

Furthermore, the proposal represents the effective use of underutilised urban land within the settlement boundary in accordance with Section 11 of the NPPF. The site currently comprises a grassed verge with no meaningful amenity, employment or economic value and its redevelopment for residential purposes represents a sustainable and efficient use of land. Additional economic benefits would also arise during the construction phase through local employment and associated expenditure, whilst future occupiers would support local services and businesses within Bognor Regis.

In relation to the second limb of the Exception Test, the submitted information demonstrates that the development will be safe for its lifetime and will not increase flood risk elsewhere. All residential accommodation is positioned at a finished floor level of 4.20m AOD, significantly above the 1-in-1000-year fluvial flood level of 2.03m AOD, thereby providing in excess of 2 metres freeboard.

The lower ground floor has been designed as an open undercroft parking area that allows flood water to pass freely through the site during flood events, consistent with the Environment Agency's guidance for development within the Aldingbourne Rife catchment. Detailed Flood Compensation Storage calculations confirm that the proposal delivers level-for-level floodplain compensation with a cumulative net gain in storage at every assessed flood slice. The submitted evidence therefore demonstrates that the development will not increase flood risk on-site, off-site or within the wider area.

Accordingly, and for the reasons set out above, it is considered that the proposed development fully satisfies the requirements of the NPPF Exception Test.

This office is closed between **MONDAY 1st to FRIDAY 5th June.**

I shall have no access to telephone messages, and limited access to email. If I am contacted during those dates, I will return your call/ email when the office reopens on Monday 8th June.

Thank you for your patience during this time.

Kind regards

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