

Arun District Council - Development
Control

Reference: HA-2026-127534/01
Customer reference: BR/24/26/PL
20 March 2026

Installation of single storey raised car park deck together with site alterations, car park reconfiguration, new access into car park, drainage alterations, creation of new drainage outfall, landscaping and other associated works.

Tesco Superstore, Shripney Road, Bognor Regis, PO22 9ND.

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation BR/24/26/PL.

Environment Agency position

In the absence of an adequate flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere.

While we are happy to see the loss of floodplain storage has been reduced, sufficient information has not been provided to detail the proposed development and its impact on flood risk.

At meetings held in 2025 the applicant proposed an area of floodplain compensation to the north-east of the existing filling station. This area was above the design flood level and potentially suitable to provide level for level floodplain compensation. No information has been provided on why this approach is no longer suitable. The design submitted with this application proposes excavation of the existing car park below the design flood level. A provision of storage in this location would only provide

compensation for flood events that reach a level of 1.17 metres Above Ordnance Datum (mAOD) and above (as per figure 6.1 in the FRA). Any flood event below 1.17mAOD would not benefit from the design compensation.

Furthermore, no detailed drawings or comparison sections have been provided for the excavated area of the car park or steel posts to show the volume lost against the volume gained. Figure 6.1 of the FRA states that 'it is estimated that the posts supporting the deck would potentially displace approximately 1.5-2m³'. This is also stated to be an initial design which is subject to further development. It would not be possible to condition this design as it is not final.

We also note that while Figure 6.1 of the FRA shows an extract of 164842-PC-0200-E_FLOOD COMPENSATION.pdf, we have not been able to find this document in those submitted as part of the application and therefore have not been able to review it as part of this consultation.

Section 6.2 Floodplain Storage of the FRA states that 'a maintenance plan will be prepared and ensure that any debris/silt buildup underneath the deck is cleared remotely using a robot on an annual basis and following a flood event'. However, this maintenance plan has not been supplied as part of the application. Given the nature of the design, it will be of critical importance to ensure the area under the deck is clear and available to store flood water in a flood event. This will need to be conditioned as part of any planning permission for the development. Without a submitted, final maintenance plan it will not be possible to condition the future maintenance and condition of the design.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice to Local Planning Authority (LPA)

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a

clear reason for refusal. If your LPA is not subject to the 'presumption in favour of sustainable development' you can disregard this paragraph. If our objection on flood risk is subsequently withdrawn, you can also disregard this paragraph.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with Paragraph 019 of the 'Determining a planning application' Guidance (Ref. ID: 21b-019-20190315), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should our objection be addressed in due course, we are likely to request some conditions for inclusion in any planning permission and provide further advice. Further conditions relating to flood risk may also be needed subject to our assessment of any additional information submitted.

If you have any questions regarding our response, please contact

[REDACTED]

Yours sincerely,

Victoria Hindmarsh,

[REDACTED]

[REDACTED]

Teville Gate House, Worthing, West Sussex

[REDACTED]



PL- Consultation- Environment Agency response



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Subject: BR/24/26/PL - EA response

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Tesco Superstore Shripney Road Bognor Regis PO22 9ND

Dear Planning Officer,

Find attached a Planning Application response to your consultation 'BR/24/26/PL'.

We have outlined any objections, conditions or informatives that are necessary for your application. if you have any questions regarding our response, please contact [redacted]

Yours sincerely,
Victoria Hindmarsh

[redacted]
[redacted]
Guildbourne House, Worthing, West Sussex

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