

Arun District Council - Development
Control
MALTRAVERS ROAD,
LITTLEHAMPTON, BN17 5LF

Reference: PA-0003099/01
Customer reference: BR/51/26/PIP
07 May 2026

Application for permission in principle for a maximum net gain of 8 No dwellings.

Longbrook Pavillion, Hook Lane, Bognor Regis, PO22 8AT.

Dear Planning Officer,

Thank you for contacting us. This is our response to your consultation BR/51/26/PIP.

Environment Agency position

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

We recognise that the submitted location and block plans identify all sleeping accommodation shall be set at First Floor level. This would sufficiently address the concerns previously raised (our reference HA/2025/127358/01-L01) regarding freeboard, and how future occupants will be kept safe from a range of flooding events up to and including the extreme event.

However, we would note that the Planning Practice Guidance (PPG) requires development to be safe for their lifetime without reliance on defences. As a result, the design flood level used to assess flood risk in this location, should have been the **undefended** flood event.

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.

The development site is located within fluvial Flood Zone 2 and affected by flooding in the 1 in 100 annual probability event plus an allowance for climate change.

Consequently, floodplain compensation is required to replace lost fluvial flood volume storage.

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

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 National Planning Policy Framework (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 grounds 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.

If you have any questions regarding our response, please contact

[REDACTED]

Yours sincerely,

Victoria Hindmarsh,

[REDACTED]

[REDACTED]

Teville Gate House, 25 Railway Approach, Worthing, West Sussex BN11 1UR

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Longbrook Pavillion Hook Lane Bognor Regis PO22 8AT

Dear Planning Officer,

Find attached a Planning Application response to your consultation 'BR/51/26/PIP'.

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]

National Contact Centre 03708 506 506
Teville Gate House, 25 Railway Approach, Worthing, West Sussex BN11 1UR

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