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Lead Local Flood Authority

Date 3rd September 2025

Simon Davis
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Simon,

RE: BR/97/25/PL – The Arcade, High Street, Bognor Regis

Thank you for your reconsultation on the above site, received on 5th August 2025. We have reviewed the application as submitted and wish to make the following comments.

This is an application for partial change of use from Class E to form 35 No residential units (Class C3), partial demolition of existing building, development of new retail and residential spaces, minor changes to existing elevations, new entrance to Arcade from Belmont Street, solar panels and other minor works to the existing building. This application may affect the setting of listed buildings and is in CIL Zone 4 (Zero Rated) as other development.

[New comments following reconsultation on updated documents are in blue.](#)

This application had pre-application advice, although it is noted that several points discussed during pre-app have not been adequately addressed. [This comment is still valid following August reconsultation.](#)

We [maintain our objection](#) to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) & Drainage Strategy. We will review this objection if the issues highlighted below are adequately addressed:

1. The Flood Map for Planning was updated earlier this year. The updated mapping must be used to assess the flood risk for the site.

[The updated FRA has not considered 1 in 1000 surface water flood risk.](#)

2. As discussed previously, further details on safe access and egress are required, in particular because the vulnerability of the site is increasing. This should include the following:
 - Evacuation plan showing how residents and users of the site can safely access and exit the building during a design flood (100 year plus 45%

climate change allowance) for the lifetime of the development. This should consider flood depths and velocity and consider all sources of flood risk.

- The evacuation plan should be to areas where there is no flood risk (from fluvial/tidal or surface water).
- Safe access routes should be located above design flood levels and avoid flow paths.
- Where appropriate, the Flood Hazard rating should be provided.

These have not been adequately addressed. The Flood Action Plan provided has various references to a site not within Bognor Regis (for example 'Sub Area 5 – Frome' and 'Your Flood Assembly Point is by the front doors to The Commercial Rooms on Corn Street'), therefore a **site specific** FRA has not been provided. The effects of climate change on safe access have also still not been assessed. The change of use of the upper floors to a 'more vulnerable' use, increases the vulnerability of the development and it is essential that safe access is provided, as an increased number of residents will be living in areas at flood risk. This could also increase the burdens on emergency services. We would normally ask for support from ADC Emergency Planner to review Flood Action Plans but as there are significant issues outstanding, we have not asked the LPA to do this yet.

This means that the application is not in accordance with NPPF para 181, PPG Flood risk and coastal change and ADC Local Plan, as it has not been demonstrated that there would be safe access from all sources of flooding for the lifetime of the development.

3. Further evidence of the existing drainage is required:

- The drainage layout says a survey is needed to find the outfall location for the existing drainage. If it is found that the existing network is connected to a Southern Water sewer, this may need to be discussed with them, to ensure the network has capacity.
- Details of any existing discharge rate from the existing drainage.
- Brownfield rates

These issues have been partially addressed. The site is brownfield and entirely impermeable currently. As this is a change of use application we would be happy to recommend conditions to cover this to ensure the site is sustainably drained for the lifetime of the development.

4. Details of any flow controls associated with the SuDS Planters.

This has been addressed.

5. As it is critical infrastructure, the substation needs to be located outside of an area of flood risk (from all sources) or have adequate resilience/mitigation measures when constructed.

This has been addressed and we can recommend conditions for the required resilience measures for the design flood.

6. It is unclear how the west side of the roof will drain/currently drains.

We would strongly suggest that the Site-specific flood risk assessment: Checklist in PPG Flood risk and coastal change is read and followed before submitting any further information. A link can be found here, the checklist is towards the bottom of the page: [Flood risk and coastal change - GOV.UK](#)

As there are significant issues outstanding, we maintain our objection to this application as it has not been demonstrated that the application follows national and local flood risk planning policy and guidance.

Yours sincerely,

Eleanor Read

Flood Risk Management Team



Annex

The following documents have been reviewed, which have been submitted to support the application;

Flood Risk Assessment & Drainage Strategy by Ridge and Partners LLP, 30th July 2025, revision P03

LLFA Comments & Responses by Ride and Partners LLP, 29th July 2025, revision P01

Flood Action Plan by Ridge and Partners LLP, 30th July 2025, version 1.0

[Redacted]


[Redacted]

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From: [Redacted]
Sent: 03 September 2025 11:06
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Response to application BR/97/25/PL

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Please could the attached response be distributed to the relevant case officer.

Regards

Flood Risk Management

Please do not reply directly to this email.

Any formal reconsultation on the application should be directed to [REDACTED] but the responding officer can be contacted directly via email if there are any questions relating to this response.

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