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**From:** Simon Davis  
**Sent:** 07 August 2025 14:17  
**To:** 'Gary Morris' [REDACTED]  
**Cc:** Isobel Woollard [REDACTED]  
**Subject:** RE: Bognor Arcade FRA/Sequential Test

Dear Gary,

I am happy that you use the same search criteria except in respect of search area as you will note that my email of 03/07 stated:

*Having said that, I have looked back at nearby examples and in late 2022, we refused BR/267/21/PL for 24 flats. Their Sequential Assessment considered sites in a 3km radius, and we accepted this. I also advised an applicant on sequential parameters for 10 houses on an industrial site in nearby Bersted late last year. I requested the search consider the Bognor Regis Built-up Area boundary as per the LP proposals map (which extends to Pagham in the west, Bersted in the North and Middleton-on-Sea in the east). I attach a map similar to the one I provided to them (based on the current BUAB). Given the circumstances of the case, we would agree to the Bognor Regis BUAB search area as per the map.*

Therefore, the search area should be the *Greater* Bognor Regis Built-up Area boundary not a 3km radius.

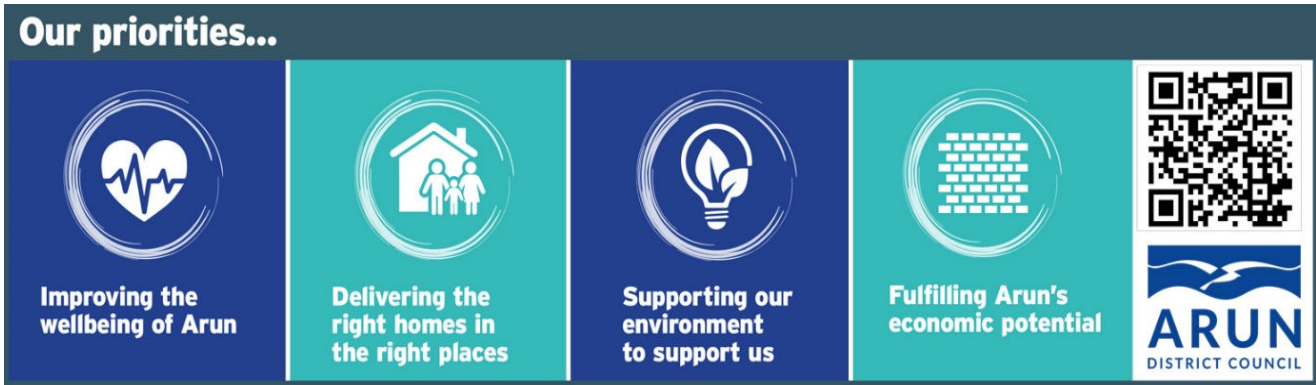
Kind Regards

Simon

**Simon Davis MRTPI**  
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To register to receive notification of planning applications in your area please go to <https://www1.arun.gov.uk/planning-application-finder>





**From:** Gary Morris [REDACTED]  
**Sent:** 06 August 2025 10:59  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Cc:** Isobel Woollard [REDACTED]  
**Subject:** FW: Bognor Arcade FRA/Sequential Test

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Simon,  
We're working on the flooding sequential test for the Bognor Arcade and I just wanted to check that you are happy that we use the same criteria as the attached sequential test, which was accepted by officers on BR/267/21/PL. In the officer's report, it was stated:

*...The submitted ST considers other sites listed in the council's Strategic Housing Land Availability Assessment (SHLAA) but states that these either do not have planning permission and so are not reasonably available or are not of a size comparable with the proposed development site. The ST advises that there is no other available land of a similar size in a 3km radius available to purchase. The submitted ST is accepted, and the proposal therefore passes the sequential test.*

I would be grateful if you could confirm that we should adopt the same approach.

Kind regards

**GARY MORRIS** MRTPI  
Partner

[REDACTED]  
[REDACTED]

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