
Sussex Building Consultancy Limited



Flood Risk Statement for Change of Use from Guest House to a Building with 4 x self-contained apartments.

**Jubilee Guest House, 5 Gloucester Road,
Bognor Regis, PO21 1NU.**

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1.0 Introduction

- 1.0 Sussex Building Consultancy Limited has been commissioned to prepare this Flood Risk Assessment (FRA) in support of a proposal consisting of change of use from guest house into 4 x self-contained apartments located at Jubilee Guest House, 5 Gloucester Road, Bognor Regis, West Sussex PO21 1NU.
- 1.1 The National Planning Policy Framework sets out planning policy in order to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.
- 1.2 The site-specific FRA should address the following:
 - how flood risk affects the proposed development,
 - whether the development type is appropriate for the proposed location,
 - whether the site's flood risk is too great for the development,
 - whether the proposed development will increase flood risk elsewhere,
 - carry out the Sequential Test and the Exception Test where necessary,
 - meet the additional flood resistance and resilience requirements where necessary.
- 1.4 The objectives of this site-specific flood risk assessment are to establish:
 - whether the proposed development is likely to be affected by current or future flooding from any source,
 - whether it will increase flood risk elsewhere,
 - whether the measures proposed to deal with these effects and risks are appropriate,

2.0 Site Description

- 2.0 The proposal site is located at 5 Gloucester Road, Bognor Regis, PO21 1NU. The site is located within the administrative boundary of Arun District Council which is the Local Planning Authority.
- 2.1 The site occupies an area of approximately 285 m². The area of building footprint is approximately 138 m².
- 2.2 Geological maps show that the bedrock of the site comprises Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation, Culver Chalk Formation and Portsdown Chalk Formation (undifferentiated) – Chalk that formed approximately 72 to 94 million years ago in the Cretaceous Period. The superficial deposits consist of River Terrace Deposits (undifferentiated) - Sand, Silt and Clay that formed up to 3 million years ago in the Quaternary Period.
- 2.3 The site is located in close proximity to the Sea with the risk of tidal flooding
- 2.4 The site topography is relatively flat and level with the general elevation varying from 3.40 m AOD to 3.60 m AOD. The finished floor level of the existing building is 4.29 m AOD.

3.0 Proposed Development

- 3.0 The proposal is for a proposed change of use from guest house to 4 x self-contained apartments. Two of the apartments will be on the ground floor and the other two on the first floor.
- 3.1 The change of use does not increase the footprint of the building, it merely changes the internal layout and use.
- 3.2 The change of use is contended not to represent an intensification of use and as such will not add to the burden of rescue and evacuation for the emergency services in the event of any flood.

4.0 Development and Flood Risk Policy

- 4.0 The National Planning Policy Framework (NPPF, July 2021) sets out the government's planning policies for England. The NPPF sets out planning and policies related to development planning and flood risk using a sequential characterisation of risk based on planning zones and the Environment Agency's Flood Maps. The aim of the flood risk assessment is to identify which Flood Zones the site is located in and vulnerability classification relevant to the proposed development, based on an assessment of current and future conditions.
- 4.1 The Flood Zones refer to the probability of river and sea flooding which ignores the presence of defences. The national flood maps have been developed by the Environment Agency that shows the risk of tidal and/or fluvial flooding across England and Wales for different return period events. The Environment Agency's Flood Maps are the maps which have been developed using broad scale hydraulic modelling. It is therefore important to understand that the flood maps may not be very accurate at a site-specific level which may need further field observation and measurements. The Flood Zones do not take into account of the climate change impacts which must be considered in any flood risk assessment as required by the NPPF.
- 4.2 As set out in the NPPF, the overall aim of the Sequential Test should be to steer new development to Flood Zone 1 (Low Probability Flooding). Where there are no reasonably available sites in Flood Zone 1, the Local Authority should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Where there are no reasonably available sites in Flood Zones 1 or 2, the suitability of sites in Flood Zone 3 should be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.
- 4.3 As the proposal consists of re-development of the existing site for a replacement dwelling, the Sequential Test will not be required.
- 4.4 The Exception Test, as set out in the NPPF Framework, is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. There are two requirements to meet for the Exception Tests. The proposed development will provide wider sustainability benefits to the community that outweigh flood risk, and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.
- 4.5 The site is located in Flood Zone 3 (high probability flooding). Both the existing (hotel) proposed use (dwellinghouse) is categorised as 'more vulnerable'. It should be ensured that all types of flood risk are considered as part of the Flood Risk

Assessment: 'A site-specific Flood Risk Assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall'.

Zone 1: Low Probability Flood Zone	This is defined as the land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
Appropriate uses	All uses of land are appropriate in this zone.
FRA requirements	For development proposals on sites comprising 1 ha or above the vulnerability to flooding from other sources as well as from river and sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off, should be incorporated in a FRA.
Policy aims	Developers and local authorities should seek opportunities to reduce the overall level of flood risk through the layout and form of the development, and

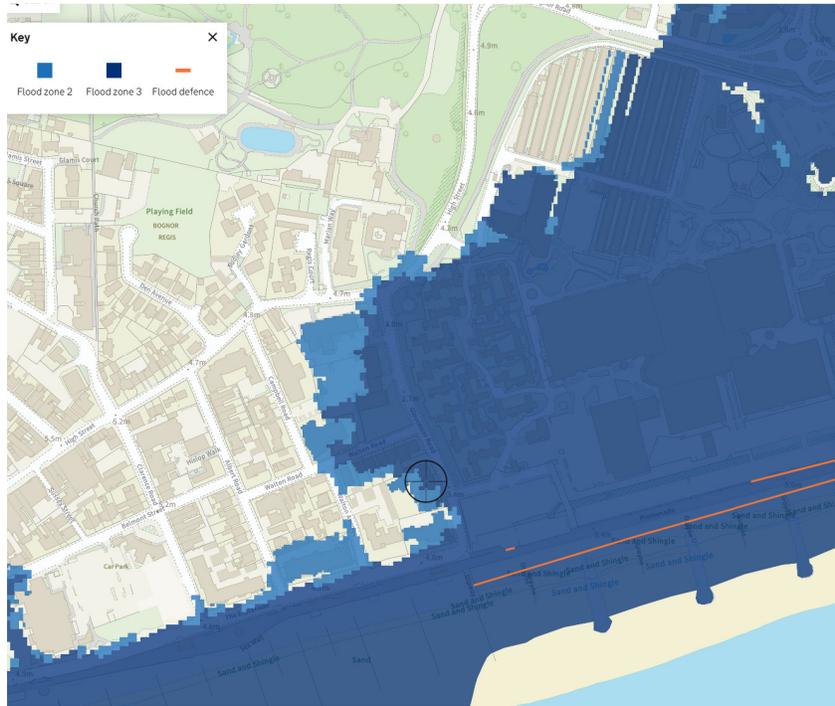
	the appropriate application of sustainable drainage techniques.
Zone 2: Medium Probability Flood Zone	This is defined as the land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year.
Appropriate uses	The water-compatible, less vulnerable and more vulnerable uses of land and essential infrastructure in Table 2 are appropriate in this zone. Highly vulnerable uses in Table 2 are only appropriate in this zone if the Exception Test is passed.
FRA requirements	All proposals in this zone should be accompanied by a FRA.
Policy aims	Developers and local authorities should seek opportunities to reduce the overall level of flood risk through the layout and form of the development, and the appropriate application of sustainable drainage techniques.
Zone 3a: High Probability Flood Zone	This is defined as the land assessed as having a 1 in 100 or greater annual probability of river flooding (<1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
Appropriate uses	The water-compatible and less vulnerable uses of land in Table 2 are appropriate in this zone. The highly vulnerable uses (Table 2) should not be permitted in this zone. The more vulnerable and essential infrastructure uses in Table 2 should only be permitted in this zone if the Exception Test is passed.
FRA requirements	All proposals in this zone should be accompanied by a FRA.
Policy aims	Developers and local authorities should seek opportunities to:

	<ul style="list-style-type: none"> ❖ reduce the overall level of flood risk through the layout and form of the development and the appropriate application of sustainable drainage techniques; ❖ relocate existing development to land with a lower probability of flooding; ❖ create space for flooding to occur by allocating and safeguarding open space for flood storage.
Zone 3b: Functional Floodplain	This is the land where water has to flow or be stored in times of flood. This zone is generally defined as the land which would flood with an annual probability of 1 in 20 (5%AEP) or greater in any year. The Local Council may define the Functional Floodplain area with a different annual probability of event.
Appropriate uses	<p>Only the water-compatible uses and the essential infrastructure listed in Table 2 that has to be there should be permitted. It should be designed and constructed to:</p> <ul style="list-style-type: none"> ❖ remain operational and safe for users in times of flood; ❖ result in no net loss of floodplain storage; ❖ not impede water flows; ❖ not increase flood risk elsewhere.
FRA requirements	All proposals in this zone should be accompanied by a FRA.
Policy aims	<p>In this zone, developers and local authorities should seek opportunities to:</p> <ul style="list-style-type: none"> ❖ reduce the overall level of flood risk through the layout and form of the development and the appropriate application of sustainable drainage techniques; ❖ relocate existing development to land with a lower probability of flooding.

5.0 Assessment of Flood Risk

5.0 For a history of flooding, the Arun District Council's Strategic Flood Risk Assessment, Level 1 SFRA (August 2016) has provided brief information about past flooding events in the local authority area. The SFRA reported no past flooding incidents in the immediate area of the site.

5.1 The site is located in close proximity to the Sea with the risk of tidal flooding. The Environment Agency's Flood Map around the site is shown in Appendix A Figure 5 which shows that the site lies within the Flood Zone 2 and 3 (high probability flooding). Flood Zone 3 tidal outline shows a 1 in 200 chance of flooding at a location in any one given year (i.e., a 0.5% annual probability of flooding). According to the information obtained from the Environment Agency, there are flood defences in the form of a sea wall, embankment and a sand and shingle beach which are maintained by the Environment Agency (Appendix C). Appendix A Figure 6 shows the Environment Agency's flood risk map which indicates that the risk of flooding to the site is 'low'.



Map – Environment Agency designating the flood risk areas and showing flood defence.

- 5.2 The surface water flooding arises when the infiltration capacity of land or the drainage capacity of a local sewer network is exceeded, and the excess rainwater flows overland. The severity of surface water flooding depends on several factors such as the degree of saturation of the soil before the event, the permeability of soils and geology, hill slope steepness and the intensity of land use.
- 5.3 As can be seen from the Environment Agency map extract below, the site is outside the area of flood extent from surface water.



Map – Environment Agency indicating surface water extent.

5.4 Floor levels are unchanged by the change of use, nor is there any intensification of the use.

6.0 Mitigation Measures

6.1 Finished floor levels - In order to afford a level of protection against flooding it is normally recommended that finished floor levels are set a nominal 300mm above the 1 in 200-year annual probability tidal flood (0.5% AEP) including an allowance for climate change. Even though the Environment Agency's tidal modelling data indicated that the site is subject to flooding in the undefended condition, the site is not subject to flooding from the 0.5%AEP (1 in 200 year) (2115) in the defended condition. Therefore, it is contended that the finished floor level of the building, sited at 690 mm above the ground level and as such 4.29 m AOD and deemed at acceptable levels.

6.2 The residual risk will be mitigated by implementing the flood resilient measures as briefly discussed below, to minimise the damage and to enable quick recovery and clean up after the flooding event:

- Water, electricity and gas meters will be located above predicted flood level.
- All service entries will be sealed (e.g. with expanding foam or similar closed cell material).
- Boiler units and ancillary devices will be installed above predicted flood level.
- Wiring for telephone, TV, Internet and other services will be protected by suitable insulation to minimise damage.

6.3 As the site is located within a flood zone area, it will be necessary to make sure that the occupants are fully aware of the flood risk and flood warning and evacuation during an extreme event.

6.4 The occupants are advised to utilise the Environment Agency's Flood Warnings Direct which is a free flood warning service called Floodline Warnings Direct (FWD). This service generally gives an advance notice of when flooding is likely to happen and time to prepare for a flood event. Property owners on the proposed development site will be able to sign up to FWD online using the following contact details:

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Methods	Remarks
Online	https://fwd.environment-agency.gov.uk/app/olr/register
Telephone	0345 988 1188

7.1 Conclusion

- 7.2 The proposal consists of change of use from guest house into 4 x self-contained apartments located at Jubilee Guest House, 5 Gloucester Road, Bognor Regis, West Sussex PO21 1NU.
- 7.3 The proposed development is categorised as 'more vulnerable'.
- 7.4 The site is located in close proximity to the Sea with the risk of tidal flooding.
- 7.5 According to the information available from the SFRA and the Environment Agency, there were no records of flooding events at the site.
- 7.6 The change of use is contended not to represent an intensification of use and as such will not add to the burden of rescue and evacuation for the emergency services in the event of any flood.
- 7.7 The Environment Agency's Flood Maps show that the site lies within the Flood Zone 3 (high probability flooding). The Environment Agency's flood risk map indicates that the risk of flooding to the site is 'low'.
- 7.8 Finished floor levels - In order to afford a level of protection against flooding it is normally recommended that finished floor levels are set a nominal 300mm above the 1 in 200-year annual probability tidal flood (0.5% AEP) including an allowance for climate change. Even though the Environment Agency's tidal modelling data indicated that the site is subject to flooding in the undefended condition, the site is not subject to flooding from the 0.5%AEP (1 in 200 year) (2115) in the defended condition. Therefore, it is contended that the finished floor level of the building, sited at 690 mm above the ground level and as such 4.29 m AOD and deemed at acceptable levels.
- 7.9 In order to minimise the damage and to enable quick recovery and clean up after the flooding event, it is proposed that flood resilient measures will be implemented.

This report demonstrates that the proposal will be safe, in terms of flood risk, for its design life and will not increase the flood risk elsewhere.