



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

Ground Floor Northleigh
County Hall
Chichester
West Sussex
PO19 1RH

Lead Local Flood Authority

Date 01 October 2026

Dear Simon,

RE: P/99/26/PL - Land North of Lagnersh House, Lower Bognor Road, Lagness, Chichester, PO20 1LW

Thank you for your consultation on the above site, received on 23 September 2026. We have reviewed the application as submitted and wish to make the following comments.

Change of use of land from agricultural to recreational use for the siting of 10 holiday lodges for seasonal use (1 March-30 September) with associated groundworks, landscaping, including retention of earth bund. This application affects a Public Right of Way and is in CIL Zone 5 (Zero Rated) as other development.

Our previous concerns outlined in our response 20 August have not been adequately addressed.

We **maintain our objection** to this planning application in the absence of an acceptable Drainage Strategy relating to:

- Further information required/updated to demonstrate viable method of surface water discharge.
- Not complying with NPPF, PPG, National Standards for SuDs or local policies.

Reason

To prevent flooding in accordance with National Planning Policy Framework paragraph 173, 175 and 180 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues below are adequately addressed.

1. We are concerned over the existing and future surface water flood risk at the site. Further evidence is needed to ensure that this can be managed by an appropriate mitigation scheme or drainage strategy on the site.
2. Hydraulic calculations for the entire site are required to ensure the proposed surface water drainage network can appropriately drain the development to current standards (eg FEH2022, CV=1 both Summer and Winter, Climate Change 45%), ensure storage quoted can be achieved at a range of rainfall event scenarios.
3. Further details of the maintenance and management of SuDS features is required. **This can be conditioned, although we recommend early consideration of management and maintenance.**
4. Updated FRA and Drainage Strategy presented for consideration with appropriate plans at sufficient detail design status to demonstrate a viable solution.
5. Percolation testing and groundwater monitoring required at site of any SuDs features.
6. Ensure 1m freeboard of any solution above groundwater level. Base of any proposed structures must be above this. Please provide confirmation of the minimum separation between anticipated winter groundwater levels and the proposed infiltration system.
7. Further clarification with respect to exceedance. Many references to "follow the site's natural topography" however updated plans/further evidence in form of exceedance drawings, depths, pathways to demonstrate that the lodges remain dry.
8. A full report, design and associated documentation demonstrating alignment to National Standards for Suds <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

All the above will provide reassurance the proposals are in accordance with the National Standards for SuDS.

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely

Mat Jackson
Flood Risk Management Team



Annex

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

- BRE Soakage Testing Report, prepared by Ecological Initiatives September 2026
- Flood Risk Assessment prepared by Ecological Initiatives, 04 July 2026

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Sent: 01 October 2026 10:11

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Subject: Response To Application Number P/99/26/PL at Land North of Lagnersh House Lower Bognor Road Lagness Chichester PO20 1LW

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Please could the attached response be distributed to the relevant case officer, Simon Davis

Regards

Mat Jackson

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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