



LIDSEY GREEN

PLANNING STATEMENT

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Executive Summary

- 1) The applicant, Hallam Land Management Ltd, is working in partnership with Bognor Regis Golf Club to secure the long-term future of the Golf Club through relocation to a benchmark new venue at land south of Grevatt's Lane that will be facilitated by the redevelopment of the existing course at Felpham for 480 new homes and extensive areas of publicly accessible parkland.
- 2) The Club faces a number of fundamental challenges at the existing site, including drainage, health and safety issues, outdated and limited facilities, high operational costs, need for extensive investment in refurbishment and encroachment from external development pressures. In order to ensure the Club's long-term financial sustainability, it will be necessary for them to relocate to another larger site as there is no space available at the current site to grow. The proposal will enable the Club to relocate to a modern venue that provides golf, service and hospitality that are recognised as the benchmark for Sussex. This is fundamental in how the Club intends to deliver their Vision *"To establish Bognor Regis Golf Club as a leading Members' Golf Club and to ensure an outstanding golf and social experience for our members, their families and our guests."*
- 3) Now that a suitable location has been found for the new course, and given the ongoing delays with Arun District Council's local plan review and the acute need for new homes in the District, the applicant is now bringing forward the proposals by seeking outline planning permission, with all matters reserved except means of access, for the redevelopment of the existing course for a residential led scheme and full planning for the new golf course. Whilst these are separate planning applications they are supported by a single Environmental Statement.
- 4) This Planning Statement supports the outline planning application for the new residential neighbourhood referred to as Lidsey Green.
- 5) There is an identified and persistent shortage of housing land supply in Arun District. The Council has recognised this and has put in place an Interim Housing Statement to increase the supply of new housing. This will require planning permission to be granted on sites other than those allocated for residential development in the development plan.
- 6) The Application Site is not identified for new housing in the development plan, is located outside of the defined settlement boundary and is subject to countryside policies. Its location within the Bognor - Felpham gap is also relevant but as a matter of principle, the policy framework does not preclude new development; rather it requires the development scheme to reflect the importance of maintaining separation between the two settlements so that they retain their individual character.
- 7) These are important policies in the determination of this application, but they must be considered in the context of various material considerations, namely:
 - a) the unanswerable need to increase the supply of housing land in the District to meet Arun's growth needs, the delay in updating the local plan to address this and the benefit the proposed development will have in improving the supply of market and affordable homes;
 - b) the range of extensive and significant benefits that the proposal can secure for the local community, especially around the green infrastructure proposals in providing publicly accessible areas of informal open space and habitat creation;



- c) the high degree of compliance that the site and the scheme have with the Council's Interim Housing Statement; and
 - d) the benefits to the Golf Club as a local sports facility and employer of being able to relocate.
- 8) The proposed development will make a **significant contribution to the need to increase housing land supply, and this attracts substantial weight** in the decision making process.
- 9) The proposed development will change the character of the Site, but the new housing is contained to the eastern body of the site and the western, northern and southern extents will provide considerable tracts of green infrastructure. Whilst the nature of the gap between Felpham and Bognor will change, **the significant areas of publicly accessible green infrastructure and habitat creation, and biodiversity gain, are substantial public benefits.**
- 10) The proposal **would secure a number of other benefits**, including repurposing the existing club house for a new community facility, and enhancements of Public Right of Ways and bus stops to promote trips to be made by sustainable modes.
- 11) The fact that this scheme does not result in the loss of a recreational facility is germane; the new and different facilities available at the new golf course represent a qualitative and quantitative improvement that can support the Golf Club in its ambition to improve its offer. **Enabling the relocation of the golf course is a significant benefit of the proposed development.**
- 12) The many suitabilities of the Application Site and the advantages of the proposed development are widely evident from the number of policy objectives in the District Council's Interim Housing Statement that are met. The high degree of compliance exhibited in these terms attracts substantial weight in the circumstances that exist.
- 13) The substantial benefit that 480 new homes adjacent to one of the District's main towns and settlement boundary would provide to meeting the identified need for housing, the other benefits arising from this proposed development and the corresponding benefits arising from relocating the existing golf course, attract such weight as to outweigh the conflict with the settlement boundary policy.
- 14) Importantly, the evidence established through up-to-date flood modelling illustrates that development can be located outside of areas of flood risk consistent with the NPPF and in accordance with the Local Plan's policy.
- 15) For these reasons, and notwithstanding the Application Site's status in the Development Plan, these material considerations indicate that planning permission should, in this instance, be granted.



1 Introduction

- 1.1 This Planning Statement accompanies an outline planning application submitted by Hallam Land Management Ltd (Hallam) for the redevelopment of Bognor Regis Golf Club for new housing.
- 1.2 A separate planning application is being submitted for the relocation of the Golf course to land south of Grevatt's Lane. The relocation of the Golf course will provide Bognor Regis Golf Club (BRGC) with new and additional facilities.

The Application Site

- 1.3 The Application Site – termed Site A across the suite of planning application documents – is defined at *Appendix 1* and measures 39.6ha. The Site currently comprises the existing Bognor Regis Golf course and associated club house and car parking. Vehicular and pedestrian access is provided from Golf Links Road. The golf course comprises fairways, fairway trees and occasional drainage ditches. A practice green is also located close to the club house.
- 1.4 The Site is located to the north of Felpham and Bognor Regis and is adjacent to the north-western edge of the built-up area of Felpham. It is bounded to the west by Lidsey Rife, beyond which is the LEC Airfield, the railway line and areas of commercial development. To the north is the A259. To the east is the existing residential environs of Felpham and Downview Primary School is to the south east. To the south are open fields extending to the B2259 and further afield Felpham.

The Partnership

- 1.5 Founded in 1892, Bognor Regis Golf Club endorses the traditional values in golf of integrity, courtesy, consideration and respect for others. At Bognor Regis these traditional golf values are combined with competitive and social golf, as well as a thriving social environment to create an enjoyable experience for all members. Whilst ensuring the present facilities provide the best experience for members and visitors today, the Club also believes that it should provide opportunities for future generations locally to enjoy the game of golf and the friendship and camaraderie it brings.
- 1.6 In April 2017, at an EGM of the club, the membership voted overwhelmingly in favour of entering into a Promotion Agreement with Hallam. This provided a framework for a development partnership to facilitate the relocation of the Golf Club and develop a new venue that will ensure the Club's long-term future.
- 1.7 Hallam is part of the Henry Boot Group of Companies specialising in the promotion of strategic land and unlocking complex and diverse planning and development challenges. Hallam has over 30 years' experience facilitating new development by planning, designing, and delivering the blueprint for places where people want to live, work and play across the UK from 7 regional offices.

The Proposed Development

- 1.8 The submitted planning application seeks outline planning permission for the following proposed development:



Construction of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure. The retention and re-purposing of the retained club house (F2).

- 1.9 Of the reserved matters associated with an outline application, appearance, landscaping, layout and scale have been reserved for subsequent approval. Means of access via Golf Links Road is not reserved for subsequent approval and the access details for which permission is sought is shown on drawing JNY10830_04D at *Appendix 2*.
- 1.10 A suite of parameter plans provide a pictorial explanation of the proposed development and are at *Appendix 3*. These are the 'controlling' plans which will govern the preparation of subsequent reserved matters applications.

The benefits of the Proposed Development

- 1.11 There is an identified shortage of available housing land in Arun District. To address this, Arun District Council are, via its Interim Housing Statement, inviting planning applications for sites that are not allocated for housing development in the Local Plan. Whilst this Site is not within the defined Built-up Area Boundary it is immediately adjacent to it and would, in these terms, represent a suitable location for new housing consistent with the Local Plan's settlement hierarchy.
- 1.12 The provision of up to 480 new homes represents a substantial material benefit in the circumstances that exist. Similarly, the number of affordable homes will make an important contribution to meeting local housing need. In addition, a significant area of green infrastructure is proposed that will provide publicly accessible informal recreational opportunities and new habitat creation. By retaining the existing club house, the opportunity exists for this to become a community facility.
- 1.13 By relocating the golf course, new and additional facilities can be provided that support the BRGC in its vision to provide an outstanding golf and social experience.
- 1.14 The current golf course suffers from a number of limitations:
- drainage issues that restricts play for long periods in the winter;
 - increasing concerns about health and safety with complaints from residents on the site's boundary;
 - poor energy efficiency and increasing costs of maintaining the club house; and
 - limited and outdated facilities with significant upgrade costs.
- 1.15 Information regarding the relocation of BRGC is included in *Appendix 4*. Moving to a new site would provide the opportunity for BRGC to create a club that is the benchmark for Sussex, both on and off the golf course. It will provide commercial sustainability for the club by allowing them to grow their golf and hospitality offering and bring it into line with the current and modern needs of golf.

Environmental Impact Assessment

- 1.16 The Applicant has deemed that together the creation of a new Golf course and the redevelopment



of the existing Golf course comprise Environmental Impact Assessment Development under Schedule 2 Infrastructure Project 10(b) *Urban Development* and Tourism and Leisure Project 12(f) Golf courses and Associated Development.

- 1.17 An Environmental Statement has therefore been prepared and is submitted with the two applications. This describes the potential environmental effects of the two proposed developments and the Project overall. The assessment of the potential environmental effects of the proposed development has concluded that it can proceed without causing an unacceptable impact on either the local or wider environments. In many respects, overall, the scheme will be beneficial.

Planning Application Documents

- 1.18 The planning application prepared by Hallam comprises an extensive suite of plans, drawings and supporting documents. For convenience these have been listed in *Appendix 5*.

Planning Statement

- 1.19 This Planning Statement provides an overarching explanation of the nature of the development proposed for the current golf course. It identifies relevant planning policies in the Development Plan and explains why the proposed development accords with a great many of those policies. Where conflict with certain other policies exists, it explains the weight to be afforded to material considerations, and how, when the planning balance is exercised, there is clear justification for planning permission being granted.
- 1.20 In this Statement the information is set out in the following Sections:
- Section 2 describes the application site and its surroundings
 - Section 3 provides details of the proposed development and its components
 - Section 4 explains the planning policy framework provided by the Arun Local Plan and neighbourhood plans, as well as other planning guidance documents
 - Section 5 sets out the material considerations that exist to support the grant of planning permission in this instance
 - Section 6 considers the planning balance in this instance
 - Section 7 provides a summary of the justification for the proposed development.
- 1.21 A separate Planning Statement has been prepared for the new golf course south of Grevatt's Lane. Where relevant and necessary, information has been reproduced across both documents.



2 The Site and its Surroundings

- 2.1 This Section describes the Application Site and its surroundings.
- 2.2 The Application Site – termed Site A across the suite of planning application documents – is defined at *Appendix 1* and measures approximately 40ha. The Site currently comprises the existing Bognor Regis Golf course and associated Club House and car parking. Vehicular and pedestrian access is provided from Golf Links Road. The golf course comprises fairways, fairway trees and occasional drainage ditches. A practice green is also located close to the club house.
- 2.3 The Site A is located to the north of Felpham and Bognor Regis and is adjacent to the north-western edge of the built-up area of Felpham. It is bounded to the west by Lidsey Rife, beyond which is the LEC Airfield, the railway line and areas of commercial development. To the north is the A259. To the east is the existing residential environs of Felpham and Downview Primary School to the south east. To the south are open fields extending to the B2259 and further afield.
- 2.4 The Site comprises a number of trees and hedgerows as part of the golf course layout and its boundaries. A Tree Preservation Order exists (ref: TPO/FP/1/07) which covers the eastern boundary of the golf course.
- 2.5 The Site is not part of, nor does it house any statutory designations: Scheduled Monuments, Listed Buildings, Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), National Parks, Registered Battlefields, Registered Historic Parks and Gardens, Special Areas of Conservation (SAC), Special Protection Areas (SPA), or Ramsar Sites.
- 2.6 Lidsey Rife is designated as a 'Biodiversity Opportunity Area' in the Arun Local Plan and a 'Local Green Space' in the Felpham Neighbourhood Plan.
- 2.7 The Lidsey Rife flows along the western boundary of the site from north to south and in its reaches past the site is categorised as a main river by the Environment Agency. The Lidsey Rife is a tributary of the Aldingbourne Rife, with the confluence of these watercourses located near South Bersted, approximately 500m south of the site boundary.
- 2.8 The Aldingbourne Rife discharges into the sea within the Butlins site in Bognor Regis via two gravity outfall structures which have tidal flaps; when tidal conditions and river flows dictate, flow is pumped over the sea wall by Felpham pumping station to discharge into a stilling bay on the upper foreshore.
- 2.9 The tidal flaps and pumps on the Aldingbourne rife are designed to reduce the risk of tide-locking however it is understood that the tidal influence extends upstream to the reach of the Lidsey Rife which flows past the site.
- 2.10 There are no flood defences in the immediate vicinity of the site. However, the Environment Agency have confirmed that Bognor Regis is currently protected from coastal flood risk by two parallel formal flood defence features that extend for approximately 800m along the coastline at the Aldingbourne Rife estuary. These are a combination of walls, groynes and embankments which provide a 1 in 200 year Standard of Protection. The River Arun to Pagham Flood and Coastal Erosion Risk Management Strategy details that these defences are expected to keep pace with climate change, subject to securing the appropriate funds and consents.
- 2.11 The Environment Agency's Flood Map for Planning shows the majority of the site, to be located



within fluvial Flood Zone 3, which comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1% Annual Exceedance Probability - AEP).

- 2.12 As the mapping is based on strategic scale modelling, baseline hydraulic modelling has been undertaken by WSP to refine the Environment Agency's flood extents for the Site. This involved some small updates to the 2015 Aldingbourne direct rainfall ICM model, to make it suitable for the purposes of a site-specific assessment of flood risk. Further details of the updates made to the model are provided in the Flood Risk Assessment submitted with the application and included at Appendix 9.1 of the Environmental Statement.
- 2.13 Habitats on-site are comprised of intensively managed grass fairways with landscaping including mature trees, ditch network and ponds. On-site habitats support bats, breeding birds, reptiles, and riparian mammals.
- 2.14 Felpham Conservation Area is approximately 750m south of the Site. There are a number of Listed Buildings within Felpham, including Churchyard wall of St Marys (Grade II); St Mary's Church (Grade II*); No 94 (Church House) (Grade II); and No 103 (Lavender Cottage) (Grade II). These are all approximately 750m from the Site. None of these designated heritage assets are considered sensitive to change from the proposed development due to a combination of topography, the distance from the site and the built-up nature within they are located.
- 2.15 There is an existing Public Right of Way (ref: 153) that crosses the site; it extends along the western boundary of the residential properties to the south of the Site and then across the golf course to the northwest to connect to a wider footpath network.



3 The Proposed Development

- 3.1 This is one of two planning applications being submitted in relation to the relocation and redevelopment of Bognor Regis Golf Club.
- 3.2 These two developments are inter-related and mutually dependent; the new golf course is required to be laid out to allow the relocation of the existing golf club and its redevelopment for housing – the new golf course will not be constructed unless the housing scheme is consented at the existing course. Neither proposed development would happen independently of the other.
- 3.3 The submitted planning application seeks outline permission for the following proposed development:

Construction of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure. The retention and re-purposing of the retained club house (F2).

- 3.4 Of the reserved matters associated with an outline application, appearance, landscaping, layout and scale have been reserved for subsequent approval. Means of access via Golf Links Road is not reserved for subsequent approval and the access details for which permission is sought is shown on JNY10830_04D at *Appendix 2*.

Parameter Plans and Illustrative Masterplan

- 3.5 The following parameter plans provide a pictorial explanation of the proposed development and are included at *Appendix 3*.

Table 3.1 Parameter Plans

Drawing Reference	Drawing Title
171-UW-P-A-005	Land Use Parameter Plan
171-UW-P-A-006	Development Density Plan
171-UW-P-A-007	Building Heights
171-UW-P-A-008	Green and Blue Infrastructure
171-UW-P-A-009	Movement and Connections

- 3.6 These are the ‘controlling’ plans; the Applicant intends that the proposed development and Reserved Matters applications will need to be in substantial accordance with these plans in the event planning permission is granted. They are the basis of the assessment of potential significant environmental effects in this ES.
- 3.7 Additionally, plan 171-UW-P-A-011 depicts an illustrative masterplan for the development. The Illustrative Masterplan indicates the principles of urban structure and urban grain, i.e., the framework and the layout of streets and routes, the location, arrangement and design of the development blocks, plot arrangement, and Green Infrastructure. The plan provides an approximate location of buildings across the site, and how the built form could relate to the streets/public realm.



Built Development

- 3.8 The Land Use Parameter Plan (171-UW-P-A-005) identifies those parts of the Site that will be developed for new housing and the existing club house building which is to be retained and re-purposed as a space for a community facility. In broad terms:
- the new housing is to be located in the central portion of the Site,
 - the northern extent will comprise open space and green infrastructure and small area of housing,
 - the western portion will comprise open space and green infrastructure adjacent to Lidsey Rife.
- 3.9 Up to 480 new homes will be built. Based on Arun's Local Plan Policy, 30% of new homes will be affordable housing as defined in the Government's National Planning Policy Framework (NPPF). *Appendix 6* includes the Applicant's Affordable Housing Statement.
- 3.10 The average density of new housing proposed will be 40 dwellings per hectare (171-UW-P-A-006), comprised of different densities across the development parcels to reflect the characters intended. This allows for a housing mix that reflects Policy H DM1 of the Local Plan; a balanced mix of market and affordable dwelling sizes including family size accommodation.

Table 3.1 Indicative Housing Mix (%)

	Market Housing	Affordable Housing
1 bed maisonette	0	24
2 bed maisonette	0	15
2 bed house	30	32
3 bed house	40	22
4 bed house	30	7

- 3.11 The heights of the new buildings are shown on plan 171-UW-P-A-007.
- 3.12 An area of 535m² has been identified as car parking to be associated with the re-purposed club house.

Green Infrastructure

- 3.13 The total amount of space provided for both green and blue infrastructure stands at 27.7 ha. This is an equivalent to c.70% of the total development.
- 3.14 Retained features within the site's green Infrastructure framework include all but one Category A tree, and tree group, alongside a large proportion of the site's Category B and C trees and tree groups.
- 3.15 The existing golf club house and adjoining ancillary buildings are to be retained and repurposed along with existing car parking to the frontage and west of these buildings.
- 3.16 The development will retain a significant existing drainage ditch and incorporate these into the site's Green and Blue network.



- 3.17 The rife, its banks and its margins will remain undisturbed with the exception of a small number (circa 3 number) new ditch connections for the creation of new water vole habitat. Additionally, two existing ditch connections may require localised works (widening) to facilitate site drainage.
- 3.18 The development will see the planting of an additional 4.23 ha of woodland and tree groupings set within parkland and new areas of habitat. These will be located predominantly to the north and west of the development albeit smaller pockets of new tree planting are proposed within the main body of the site. Additionally, circa 120 new specimen street trees will be incorporated within residential streets.
- 3.19 Circa 3000 sq.m of new communal growing space is proposed to the north of the site along with 3 new play spaces catering for a range of ages and abilities. Two of the proposed play spaces are to include equipped play provision whilst the third will comprise natural play.
- 3.20 The enhancement of existing habitats on the Site will see an expansion of the existing ditch network for drainage purposes and for the benefit of the local water vole population. In total an additional 2,200 linear meters of new waterways is proposed. These extend from and tie into a series of sustainable drainage basins comprising of open water, wetland and damp grassland. These features in turn cover a total area of 1.36 ha.
- 3.21 The developments Green Infrastructure proposes new areas of species rich meadow, scrub, wetland, and woodland, along with wood piles, bird and bat boxes.
- 3.22 The biodiversity net gain calculation for Site A have resulted in a habitat gain of 10.29%, which is a result of the GI that is being retained and enhanced to the west along Lidsey Rife and the newly created woodland and grassland habitats proposed. The hedgerow and river scores were also positive with 17.43% and 46.95% respectively.
- 3.23 Public access will be possible into and through the Site through the provision of circa 3,000 linear meters of new permissive public footpaths. These new routes will feed into the existing local network of pedestrian footpaths which are to be retained and enhanced with surfacing, signage and seating. Routes will ensure access to proposed parkland to the north and west of the site for all.

Means of Access

- 3.24 A new junction is to be created onto Golf Links Road as shown on Drawing JNY10830-04 Rev D. This is included at *Appendix 2* and illustrates the access and egress into the site for future residents from Golf Links Road, and the provision of an emergency access also. This access arrangement will replace the existing junction to the car park.
- 3.25 This new arrangement will change the traffic priority at the junction of Downview Road, Golf Links Road and Shirley Drive; creating a crossroads with the priority afforded to north south traffic rather than east west traffic as current. A new raised table will be introduced at this crossroads with tactile paving for pedestrians. New footways will tie in with the existing.
- 3.26 The access will comprise a 6m wide carriageway with a 3m wide shared footpath/cycleway on one side and a 2m wide footway on the other side. Forward visibility of 38.5m and 41m respectively can be achieved which accords with the speed measurements recorded and Manual for Streets calculations.



- 3.27 The section of the PRow south of the site to Downview Primary School is currently across 3rd party land and passes through a recreation area. The route is unsurfaced and is predominantly used by dog walkers and recreational activities with a gated access. The opportunity exists to provide a surfaced footway / cycleway link between the site via this PRow which would enable a continued direct route between the site and the existing schools and local facilities linking in with the proposals that are being proposed by WSCC. The upgrading of this section of the PRow could be provided to be in keeping with the local area by providing a bound surface.
- 3.28 To the north of the site, PRow route 153 joins the A259 Felpham Relief Road and the existing footway / cycleway. This connection also passes over 3rd party land as per the section to the south that links to Downview Primary School, however a contribution towards the upgrade of these sections to provide a continued footway / cycleway link would be provided as part of this development proposal and would be secured as part of a S106 agreement. If through a contribution, the section of PRow 153 referenced above can be upgraded to a bridle way by WSCC through a contribution by the developer this would benefit not only the existing residents but also the wider community by providing a direct pedestrian / cycle north-south route between B2259 and A259.
- 3.29 Within the site the existing PRow route will be maintained and incorporated through the design of the development. The development proposal will also provide improvements to bus stops locally to the site which will include bus shelters (where possible), raised kerbs and real time information.
- 3.30 As part of the mitigation measures, improvements will be provided to the Downview Road/ B2259 to improve capacity and also provide improved crossing facilities on Downview Road and Felpham Road arms of the junction. Other mitigation measures are proposed at the B2259/B2132 junction to improve capacity.
- 3.31 The Local Plan refers to an indicative route for the Enterprise Bognor Regis Link Road being safeguarded (Policy T SP3). The Movement and Connections Parameter Plan identifies a potential route for this drawing upon published information by Bognor Regis Town Council, entitled Enterprise Bognor Regis. The submitted planning application is not seeking permission for this Link Road and this has not been assessed in the EIA; rather a corridor of land has been identified at the northern extent of the Site, consistent with the Bognor Enterprise illustration, which will be safeguarded to facilitate the potential construction of that new road in the future. Hallam anticipate that should planning permission be granted, the Section 106 Agreement will include obligations, including making this land available and financing the construction of that section of the Link Road (within the redline only), for delivery either by the District or County Council and subject to certain triggers being hit and criteria satisfied. For clarity, it will be the responsibility of other parties to secure planning permission for the Link Road and provide for its delivery on land outside of the application redline.
- 3.32 Importantly, whilst the proposal would be served by a suitable access from Golf Links Road the Movement and Connections Parameter Plan indicates that onward vehicular connections to land to the north east of the site and then A259 would be possible. However, this is dependent on other parties bringing forward a development proposal there that provides for such onward connections and linkages.

Drainage

- 3.33 To mitigate the risk of surface water flooding to the development a comprehensive drainage /



SUDS strategy has been developed for Site A. This strategy involves attenuating the surface water runoff at source, via ponds and swales, prior to discharge to the Lidsey Rife.

- 3.34 The post-development surface water drainage strategy will restrict peak flows for all events from the impermeable areas to the equivalent greenfield rate (QBAR), thereby ensuring the risk of surface water flooding does not increase both on the Site and for the surrounding area.
- 3.35 The drainage strategy utilises and enhances the current ditches across the site along with the creation of a new series of ditches / swales to convey and attenuate the surface water from the various parcels of the development to the attenuation ponds. The ditches / swales feed into the northern attenuation pond, which then drains into the southern attenuation pond before discharging into the Lidsey Rife via the existing outfall.
- 3.36 The strategy also includes a berm that separates the north and south of the site. This helps to ensure the fluvial and surface water flood risk storage is maximised in the northern part of the Site which is already at risk of flooding. The berm will range from 1.84mAOD to 1.9mAOD, whilst the maximum modelled water level upstream is shown to be 1.54mAOD.
- 3.37 In addition to the drainage features the development will be located on platforms that are raised above the surrounding ground levels. This is to ensure the platforms are above the predicted flood level (1.5mAOD) and to allow for gravity drainage across the Site.
- 3.38 The levels of the platform will vary across the Site, with the lowest level being approximately 1.4mAOD. The individual platform heights are constrained by the presence of the trees that need to be maintained on the Site. The platform levels have therefore been set to ensure the landscaping can effectively be tied into the ground levels of the trees that are being maintained.
- 3.39 The platforms will include a slight ridge along the centre and the FFL will be raised a further 300mm above the platform level to allow for drainage of each platform. The lowest FFL is therefore 1.7mAOD i.e., above the 1 in 100 year plus climate change peak water level.
- 3.40 The 1 in 100 year including climate change post development model results demonstrate that the platforms and the surface water attenuation ponds are free from flooding. The access and egress route to the north is also shown to be dry. The primary access to the site via Shirley Drive is shown to be safe.
- 3.41 Foul Drainage will occur under gravity to a number of pumping stations within the site and will be pumped to the existing Southern Water Services (SWS) pumping station on Downview Road, subject to ongoing discussions with SWS.

Sustainability

- 3.42 To align with national and local policy, and industry good practice, the sustainability ambitions of the proposed development, set out in the accompanying Sustainability Strategy, are to:
 - Support local economic growth and employment, both during construction and operation;
 - Respond to the local demography to ensure a carefully selected mix of quality and affordable homes and buildings, which are also future proofed – particularly in terms of energy performance;
 - Create environments in which healthy, active lifestyles can be pursued, and where sustainable transport modes are accessible and prioritised;



- Identify ways and means to improve resilience and adaptability to long term changes in climate;
- Maximise biodiversity value, and the ability of local residents to access and enjoy that value;
- Integrate the scheme into its surroundings, whilst ensuring that the character of the buildings is both 'of their time' and appropriately distinctive in the context of the Felpham area; and
- Ensure easy access to nearby community facilities and destinations, through a network of public rights of way.

3.43 Some of the key sustainability measures that are being pursued in the planning and design of the Proposed Development, and that will benefit both residents and the local communities across its full lifecycle, include:

- Achieving 30% affordable homes across the site.
- Working in accordance with the principles of Secured by Design, to promote safety for the community.
- Designing the residential developments to respond to the requirements of the circular economy, in the way that earthworks at site are managed (striving for 'self-containment'), and building materials are selected responsibly and sustainably.
- Achieving Lifetime Homes Standards, which sets out sixteen criteria that help building owners easily adapt - with minimal additional investment - their properties for future needs.
- Anticipating Future Homes Standard, supporting the drive for future proofed low carbon heating and energy efficiency.
- Producing 10% of the total predicted energy requirements of the site, from renewable or low carbon energy sources.
- Prioritising pedestrian and cycle access to the natural and other community spaces, and to the existing (wider) green infrastructure network.
- Making provision for electric vehicle charging and cycle storage, in accordance with local policy requirements.
- Taking into account the effects of climate change in the design of site drainage strategy, whilst including naturalised swales and Sustainable Drainage Systems – these measures will ensure both the properties and land (on and adjacent to the site), are protected from flooding both now and in the future.
- Ensuring the designs preserve and improve access to the ecology of the Lidsey Rife, which is designated as a 'Biodiversity Opportunity Area'.
- Providing green spaces for community recreation, health and wellbeing, and growing edible fruit, vegetables and plants.
- Incorporating a mix of native and non-native plant species at site, selected with the changing climate in mind.

Planning Obligations

3.44 In the event planning permission is granted, there will need to be a Section 106 Agreement that includes the various planning obligations. *Appendix 7* provides the Applicant's Draft Heads of Terms in respect of this.



4 The Development Plan

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires an application for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 In this instance, the Development Plan is comprised of the following:
- a. The Arun District Local Plan which was adopted in July 2018 and covers the period to 2031
 - b. The Felpham Neighbourhood Plan which was first made in 2014 and then reviewed in 2021
 - c. The Yapton Neighbourhood Plan which was first made in 2014 and is currently being revised
 - d. The West Sussex Minerals and Waste Local Plans
- 4.3 The relevant Development Plan Policies related to the application site and the proposed development are discussed in the following paragraphs; this considers firstly the status afforded to the Site, then policies related to the development proposed and then other more general policies.

The status the application site relative to the Development Plan

- 4.4 The Application Site lies immediately adjacent to, but outside, the delineated Built-Up Area Boundary and is situated within Countryside. The Proposed Development does not constitute a type of development that would be permitted by **Policies SD SP2 and C SP1** of the Local Plan or the Felpham or Yapton Neighbourhood Plans. The proposed development therefore conflicts with these policies.
- 4.5 However, in the context of Section 38(6) of the Act, material considerations need to be taken into account in determining the planning balance. In the instance of this Application, those material considerations are:
- a) the unanswerable need to increase the supply of housing land in the District to meet Arun's growth needs, the delay in the local review to address this and the benefit the proposed development will have in improving the supply of market and affordable homes;
 - b) the range of extensive and significant benefits that the proposal can secure for the local community, especially around the green infrastructure proposals in providing publicly accessible areas of informal open space and habitat creation;
 - c) the high degree of compliance that the site and the scheme have with the Council's Interim Housing Statement; and
 - d) the benefits to the Golf Club as a local sports facility and employer of being able to relocate.
- 4.6 Together, and as is demonstrated herein, these material considerations are of such weight as to clearly and demonstrably outweigh the status of the site in the Development Plan.
- 4.7 The Application Site is also situated within the Gaps Between Settlements designation in **Policy**



SD SP3 that seeks to retain the District's settlement structure and the generally open and undeveloped nature of certain gaps between settlements. The "Gaps" are intended to prevent coalescence between settlements and retain their separate identity.

- 4.8 The Policy does not preclude new development but requires the development scheme to reflect the importance of maintaining separation between two settlements so that they retain their individual character. Development will only be permitted within the gaps where various criteria are met.
- 4.9 The proposed development will change the character of the Application Site; fairways will be replaced by built development, new landscaping, water features and habitat creation. Importantly, new housing is contained to the eastern body of the site and the western, northern and southern extents will provide green infrastructure – 70% of the site will be green infrastructure. Indeed, development will be buffered to a minimum depth of 50m from the rife to the west of the site and screened with new planting to supplement existing tree lines. There will continue to be separation between Felpham and Bognor and the intervening space, albeit reduced to a degree, has a more productive and meaningful purpose achieving biodiversity net gain and public access to a substantial area of new parkland alongside the rife.

Housing

- 4.10 **Policy H SP1** sets out the Local Plan's **Housing Requirement**. The Application Site is not amongst the housing sites identified in either the Local Plan or Neighbourhood Plan. However, for the reasons set out in Section 5 the need to increase housing supply in the District is beyond question and the District Council's Interim Housing Statement recognises that planning permission will need to be granted on sites that are not allocated in the Local Plan to achieve this. The proposed development will contribute towards this identified need and in meeting the number of new homes required by Policy H SP1.
- 4.11 The proposed development will comprise 30% affordable housing in accordance with Policy AH SP1. The Affordable Housing Strategy sets out the Applicant's approach towards affordable housing. The tenure mix takes account of the 75:25 split in the policy alongside the Government's policy objectives for affordable home ownership and First Homes set in the NPPF and the Ministerial Statement. The Applicant proposes an affordable housing scheme is secured as a planning obligation.
- 4.12 In term of housing mix, this is intended to be consistent with the broad conclusions of the Strategic Housing Market Assessment as required by Policy H DM1. The illustrative housing mix at Table 3.2 which has informed the Land Use Parameter Plan is based on the following principles:
- the greatest proportion of market housing is 2-and 3-bedroom accommodation; approx. 70% of the new homes will be two- and three-bedroom houses.
 - approx. 70% of the affordable homes would be 1- and 2-bedroom properties, which would comprise 1 and 2 bedroom maisonettes and 2 bedroom houses.
 - The market mix provides family sized accommodation. Felpham is not considered a location suitable for 1-bedroom market flats; this would not be characteristic of the local area.
 - The proportion of 4-bedroom properties proposed reflects market information.



Health, Recreation and Leisure

- 4.13 The application for new housing is inter-related with that for a new golf course and would not proceed without the golf course having first been relocated. Consequently, there will not be a loss of outdoor sport facilities; rather the new facilities would represent an improved offer both in terms of the standard of the course and better facilities. In these terms, the proposed development would accord with **Policy OSR DM1** of the Local Plan and **Policy CLW2** of the Neighbourhood Plan. The new location, some 4km further to the east has been chosen by the Golf Club as being suitable and will support its vision to establish an outstanding golf and social experience.
- 4.14 Moreover, the proposed development will provide a substantial area of green infrastructure that will be available for public access. This will represent a substantial increase in the amount of publicly available space for informal recreation for existing and future residents to reflect **Policy HWB SP1**. Whilst the Public Right of Way will be improved, new permissible routes will be created to allow and encourage access to the newly created greenspace.
- 4.15 Design and Access Statement Chapter 6 explains that the proposed development will ensure that the requirements of the Open Space Standards SPD for different types of open space will be greatly exceeded through the generous 27.7ha of open space that will be provided on site. The Council's Infrastructure Funding Statement indicates that its CIL receipts can be used for Leisure and Recreation projects. This would include offsite formal or informal sports which is not provided as part of the proposed development.
- 4.16 In addition, areas of growing space are identified on the parameter plans, which would be equivalent to, but more flexible than, allotments. This accords with the tenet of **Policy OSR SP1**.

Employment and Enterprise

- 4.17 The application site is situated close to the Strategic Employment Allocation identified in **Policy EMP DM2** (LEC Airfield and Adjoining Land) that is part of the Enterprise Bognor Regis Area. **Policy T SP3** lists *Scheme f* as the Bognor Enterprise Link Road. Whilst an illustrative route is shown on the Policies Map this is subject to design, consultation and approval.
- 4.18 The proposed development does not prejudice the delivery of this highway link and has been designed to enable it.
- 4.19 The Movement and Connections Parameter Plan identifies a potential route for this, drawing upon published information by Bognor Regis Town Council entitled Enterprise Bognor Regis. The submitted planning application is not seeking permission for this Link Road and this has not been assessed in the EIA; rather a corridor of land has been identified at the northern extent of the Site, consistent with the Bognor Enterprise illustration, which will be safeguarded to facilitate the potential construction of that new road in the future. This will be addressed in a Section 106 Agreement should planning permission be granted.
- 4.20 To accord with **Policy SKILLS SP1**, an Employment and Skills Plan for the construction phase can be prepared pursuant to a planning condition in the event planning permission is granted.

Design

- 4.21 **Policy D SP1** and **D DM1** of the Local Plan and **Policy ESD1** of the Neighbourhood Plan concern



the **Quality of Design**; all development proposals should make efficient use of land but reflect the characteristics of the site in its layout, landscaping, density, mix, scale, massing, character, materials finish and architectural details.

- 4.22 Certain of these are consideration are relevant to the *reserved matters* stage, however, the accompanying Design and Access Statement explains the design principles and concepts that have been applied to the development and how issues relating to access to the development have been dealt with. Amongst other things, it demonstrates the steps taken to appraise the context of the development and how the design of the development takes that context into account. In doing so, it responds to the design consideration in these two policies as well as Arun's Design Guide.

Green infrastructure, landscape character and the natural environment

- 4.23 **Policy GI SP1 Green Infrastructure** requires that major developments are designed to protect and enhance green infrastructure assets.
- 4.24 In this instance, those assets comprise the site's tree stock, the watercourses and the Lidsey Rife. A significant area of publicly accessible greenspace is to be provided – measuring some 27ha – or 70% of the site area. The proposed development retains all except one Category A Trees and Groups, new watercourses are to be formed and major areas of new habitat planting is proposed along the Rife that enhances its biodiversity value. This is consistent with the Biodiversity Opportunity Area identified on the Policies Map.
- 4.25 **Policy LAN DM1** requires development throughout the plan area to respect the particular characteristics and natural features of the relevant landscape character areas and seeks, wherever possible, reinforcement or repair of the character of those areas.
- 4.26 The Landscape and Visual Assessment undertaken as part of the EIA process considers the landscape features that are important in this landscape character area; Chichester to Yapton, how they are represented within the application site, and how the proposed development respects those features.
- 4.27 Whilst there will be a change in the character of the application site, the new greenspace that is to be provided carefully reflects important landscape character attributes; principally it provides new woodland, tree and hedgerow planting to create a landscaped setting that establishes a new visual envelope along with retained and new drainage ditches and swales. A new permissible footpath enables public access.
- 4.28 As **Policy ENV SP1** explains, the District Council encourages and promotes the preservation, restoration and enhancement of biodiversity and the natural environment through the development process. The proposed development has been carefully designed to create a green and blue infrastructure network that both frames new development and provides positive measures to restore and enhance biodiversity. This ensures the preservation, restoration and enhancement of biodiversity and the natural environment through the development process as required by **Policy ENV SP1** of the Local Plan and **Policy ESD9** of the Neighbourhood Plan. Indeed, the development proposals enhance the Site's features and returns a positive Biodiversity Net Gain.
- 4.29 Particular regard has been had to the Lidsey Rife, which is designated as **Local Green Space** in the Neighbourhood Plan because of its natural environment and ecological importance and significant natural wildlife character and interest. The proposed development does not involve land



designated as Local Green Space and this Policy is not directly relevant. However, the proposed development provides an extensive tract of publicly accessible green space adjacent to the rife that complements this and contributes to biodiversity improvements.

- 4.30 The Environmental Statement and its associated ecological impact assessment has identified the proximity of the Site to designated sites and has considered the potential effects of the proposed development on these sites, concluding that there are no predicted adverse effects on any international, national or local designated site in accordance with **Policy ENV DM1**. The application site is not within the 5km zone of Pagham Harbour and **Policy ENV DM2** is not relevant.
- 4.31 The accompanying arboricultural report explains the tree loss that will occur, as fairway trees are removed to create development platforms and then replaced with new planting. Importantly, all but one Category A tree and no groups are to be retained and the development respects the Root Protection Zone of the trees along the Site's boundary that are subject to Tree Preservation Orders. Taking these considerations together, and the many other of its identified benefits, the proposed development accords with **Policy ENV DM4**.
- 4.32 **Policy ECC SP1** concerns **climate change** and lists design considerations to ensure new development is located and appropriately designed to adopt to climate change. The FRA includes flood modelling that takes account of climate change, and the Environmental Statement considers climate change resilience measures.

Transport

- 4.33 The new housing will be located within easy access of established public transport services and existing pedestrian and cycle routes.
- 4.34 The accompanying Transport Assessment considers the likely increase in traffic from the proposed development; this demonstrates that the transport effects of the development can be satisfactorily mitigated in accordance with **Policy T SP1**.
- 4.35 As part of the mitigation measures, improvements will be provided to the Downview Road/ B2259 junction through improved crossing facilities helping to reduce queueing times. Other mitigation measures are proposed at the B2259/B2132 junction to improve flows.
- 4.36 Within the development, the layout includes permeable routes that prioritise walking and cycling. A Travel Plan is also provided to encourage sustainable modes of travel to reflect **Policy T DM1**. Discussions have been had with WSCC regarding improvements to the Public Right of Way and local bus services. Parking provision is expected to accord with West Sussex County Council's parking standards.

Soils

- 4.37 **Policy SO DM1** seeks to conserve the best and most versatile agricultural land. The Application Site is not classified as agricultural land; on the published ALC maps, it is referred to as 'non-agricultural land'.

Building Conservation and Archaeological Heritage

- 4.38 None of the Local Plan's Building Conservation and Archaeological Heritage policies would



preclude the proposed development.

- 4.39 Felpham Conservation Area is located approximately 750m from the site, as are a number of listed buildings. Due to a combination of topography, dense vegetation around the Application Site, distance and the built-up nature within they are located, none of these are considered sensitive to change by the proposed development. The application site is not within, nor close to, a designated Area of Character.
- 4.40 A Heritage Desk Based Assessment and Geoarchaeological Desk Based Assessment have been provided as part of the Environmental Statement. There may be undesignated archaeological assets, these are likely to be of limited importance. The implementation of a staged programme of archaeological works for Site A will allow the identification of archaeological assets within the Site and a suitable mitigation strategy to be developed.
- 4.41 The proposed development therefore accords with Policies **HER SP1** and **HER DM1 – DM6** that seek to protect cultural heritage and archaeological assets.

Water

- 4.42 The Local Plan seeks to ensure the District's water resources are protected and enhanced.
- 4.43 There is an associated area of flood zones 2 and 3 shown on the extract from the Environment Agency (EA) Flood Map for Planning in the accompanying Flood Risk Assessment (FRA) (Figure 5-3). This mapping is based on strategic scale modelling; whereas site-specific hydraulic modelling undertaken by WSP, in accordance with a scope agreed with the EA, demonstrates that the development platforms are not at risk of flooding during the 1 in 100 year plus climate change event. The FRA also explains that the proposed development will have a safe access and will not increase flood risk elsewhere. **Policies W SP1 and W DM2** of the Local Plan and **Policy ESD5** of the Felpham Neighbourhood Plan, which require new development to be appropriately located, taking account of flood risk, are therefore met.
- 4.44 A Sequential Test and Exception Test has also been undertaken. Because the two proposed development – the housing scheme and the golf course scheme are inter-related, the housing scheme cannot be located at another site i.e., the housing can only be located at the existing golf course in order to facilitate its relocation. Notwithstanding this, the **Sequential Test** has not identified any reasonable alternative sites from the District Council's Housing and Employment Land Availability Assessment that would be in the appropriate location, developable and free from site constraints and policy conflicts to deliver the overall project of the relocation and redevelopment of the golf course.
- 4.45 Moreover, the **Exception Test** requires consideration of wider sustainability benefits that could outweigh the flood risk. As well as being situated in a highly accessible sustainable location with services and facilities within walking and cycling distance, the proposed development will deliver a number of public benefits: delivering a wide range of open market and affordable housing; on-site enhancement to accessible public open space; achieving biodiversity net gain across the site; economic benefits both during construction and occupation of the development; repurposing of the existing club house as a local community facility; and monetary contributions via CIL to local infrastructure and services;
- 4.46 The proposed development includes sustainable drainage systems in accordance with **Policy W DM3**. These features will reduce the creation and flows of surface water and improve water



quality. The new development will also employ water efficiency measures in accordance with **Policy W DM1**.

- 4.47 It is evident from the above, that in a great many respects the proposed development accords with the development plan when read as a whole. None of the other Local Plan policies are considered germane to the consideration of an outline planning application and are more relevant to detailed design.

Yapton Neighbourhood Plan

- 4.48 The northern portion of the application site is situated with the boundary of Yapton Parish. The Yapton Neighbourhood Plan was made in October 2014.
- 4.49 Its Proposals Map is focused on the settlement itself and does not extend to the golf course. Other than on the two allocated sites identified on the Proposals Map, new housing is to be contained by the defined built-up area boundary. Policy BB1 only permits development proposals outside the built-up area boundary in a limited number of circumstances. The northernmost housing element of the scheme is situated within Yapton Parish and would represent development in the Countryside contrary to this policy. This is the same policy conflict as with the Local Plan and the Felpham Neighbourhood Plan.
- 4.50 The Neighbourhood Plan is subject to review at the present time; with public consultation relating to proposed modification currently being held. So far as the application site is concerned, the revisions to the Neighbourhood Plan does not materially change the above policy framework.

Minerals and Waste Local Plan

- 4.51 The Application Site is not subject to any designations in either the Joint Minerals Local Plan adopted in 2018 or the Waste Local Plan adopted in 2014.



5 Housing Land Supply

- 5.1 This Section explores Housing Land Supply in the District.
- 5.2 Since 2019 the Council has not been able to demonstrate the required 5-year supply of housing land. In the 2018/2019 Annual Monitoring Report (AMR) the Council demonstrated it had a 3.9 year supply of housing land. In the 2019/2020 AMR it demonstrated a 3.3 year supply of housing land. The most recent estimate of the number of years supply, in November 2021, suggests this is now 3 years at most.
- 5.3 Moreover, the Government's Housing Delivery Test (HDT) for 2018 and 2019 records levels of completions below the required amount, having fallen to 68% in the most recent year. This requires the Council to apply a 20% buffer to its housing land supply calculation and prepare an Action Plan.
- 5.4 The Local Plan includes a trigger mechanism, where, in the event housing performance falls below the annualised housing requirement or projected requirement over two successive years. The Council should therefore be reviewing Policy H SP1 which defines the housing requirement and, by extension, the housing supply strategy.
- 5.5 It is beyond question that there is a need to "*significantly boost*" housing supply in Arun. This need exists both in the short term and the long term. This circumstance is a material consideration in determining housing applications, such as that proposed.

The Local Plan's Housing Requirement

- 5.6 The adopted Local Plan's housing requirement is derived from the following components:
- a. Objectively assessed need of 919 dwellings per annum
 - b. An additional 81 dwellings per annum to meet unmet need from adjoining authorities.
- 5.7 Over the plan period, Policy H SP1 requires at least 20,000 new dwellings to be built between 2011-2031.
- 5.8 Delivery was to be phased over the plan period on the basis of the following trajectory:

Requirement of Additional Homes	2011/12 – 2015/16	2016/17- 2020/21	2021/22-2025/26	2026/27-2030/21
Dwellings per Annum	610	1120	1310	960



Housing Completions

- 5.9 Housing Completions in the District are set out in the AMR and are reproduced below along with the Local Plan's housing trajectory requirement.

Year	Completions (net)	Per Annum Requirement	Surplus/Deficit	Cumulative Performance
2011/12	722	610	+112	+112
2012/13	475	610	-135	-23
2013/14	359	610	-251	-274
2014/15	601	610	-9	-283
2015/16	890	610	280	-3
2016/17	616	1120	-504	-501
2017/18	704	1120	-416	-917
2018/19	603	1120	-517	-1434
2019/20	515	1120	-605	-2039

- 5.10 The above illustrates at the present time, some 2000 too few houses have been built in the plan period.
- 5.11 The annual number of completions has fallen below the per annum requirement in seven of the nine years concerned.
- 5.12 In 45% of the plan period, only 27% of the housing requirement has been provided.
- 5.13 What must be remembered is that the trajectory for the first five-year period simply reflected completions that had been achieved during the time the Local Plan was being prepared. Only from 2016/17 onwards does the increase in the housing requirement to achieve Policy H SP1 take effect. From this point on, the per annum requirement has not been met in any single year and the number of completions achieved is only half of the total requirement over the four years.
- 5.14 To address this shortfall, and to ensure the housing requirement in Policy H SP1 is met, the average annual rate of completions must increase to 1319 per annum. In other words, the Local Plan's trajectory for 2021-2026 of 1310 must be sustained for the remainder of the plan period.
- 5.15 There is unquestionably a need to increase the supply of housing in the District that will require future rates of housing provision to exceed the Local Plan's housing trajectory. The extent to which the proposed development can contribute to the supply of housing land is a material consideration.

Affordable Housing Supply

- 5.16 The most recently published Housing Needs evidence for the District is dated 2016; it indicates a net need for affordable housing of 480 dwellings per annum.
- 5.17 The AMR indicates that, between 2012 and 2020, a total of 1150 new affordable homes were delivered across the District.
- 5.18 This is some 26% of the total need for affordable housing over this period. When seen as a proportion of the total number of new homes built, the number of affordable homes amounts to only 21% of the overall supply.



- 5.19 Again, there is unquestionably a need to increase the supply of affordable housing in the District. The extent to which the proposed development can contribute to the supply of housing land is a material consideration.

Future Supply

- 5.20 The Housing Trajectory at Appendix 9 of the AMR indicates a surplus of supply by the end of the plan period. This is based on a number of critical assumptions:
- a. there will be 400 housing completions on sites that are referred to as Deliverable or Developable and inside the built-up area boundary;
 - b. a further 594 small windfall sites which may be double counted with the above category;
 - c. housing completions from Strategic Allocation Sites totalling 6800 new homes; and
 - d. further as yet unidentified sites to be allocated in a Small Sites Development Plan Document or Neighbourhood Plans, totalling 850 new homes.
- 5.21 It is instructive that the Council has ceased preparation of its Non-Strategic Sites Development Plan Document. In the Local Plan, this was intended to provide “at least 1250 new homes”. This component of housing land supply is therefore absent from the Council’s future supply estimates.
- 5.22 The assumption about Strategic Sites is highly questionable.
- 5.23 **Barnham/Eastergate/Westergate:** Some 2400 completions are expected at SD5 by 2031, with development commencing in 2022/23. There is no planning permission for development at this Strategic Site at the present time. A Framework Masterplan was prepared by landowners in Autumn 2020 to inform future planning applications. At the same time, one of the landowners, The Church Commissioners submitted a scoping request for the purposes of EIA Regulations; this concerned a proposed development of up to 1500 new homes. This is some way below the suggested capacity in the Local Plan and the delivery assumption in the trajectory. A number of smaller planning applications within the area of the Strategic Site have been submitted and an application for development adjoining the Strategic Site was recently refused because it did not represent a holistic approach to the Site’s development. Allowing for the planning process prior to commencement of development, there is no prospect that 2400 new homes will be provided at SD5 by 2031.
- 5.24 **West of Bersted:** Some 2100 completions are expected at SD3 by 2031, with development commencing in 2021/22. There is no planning permission for development at this Strategic Site at the present time. Whilst a Framework Masterplan was prepared by landowners in 2020 to inform future planning applications, that recognises that the development programme will not correspond with this trajectory. An application for part of the Site was refused in May 2021. Allowing for the planning process prior to commencement of development, there is no prospect that 2100 new homes will be provided at SD3 by 2031.
- 5.25 **Ford:** Some 1175 completions are expected at SD8 by 2031, with development commencing in 2023/24. Redrow and Wates jointly submitted an outline application seeking planning permission for up to 1500 new homes in proposals for the re-development of the former airfield in March 2020. It appears that revised plans, included a new masterplan, were submitted in July 2021.



- 5.26 The Environmental Statement submitted with the application suggests that 1500 dwellings would be complete by 2030/2031, with first completions in 2020/21. Plainly this assumption is not correct. This housing trajectory's assumption of 1175 being built in ten years when there is no planning permission in place is optimistic.
- 5.27 **Pagham:** Outline planning permission was granted for development at each of the three sites that comprise the Pagham Strategic Sites in 2019. These permissions total 1059 new homes, whereas SD2 intends for at least 1200 new homes to be provided at these Sites. Housebuilders now control the various development parcels, and the approval of reserved matters is at various stages. On this basis, it is reasonable to assume that significantly more than 55 completions will be achieved at SD2.
- 5.28 Taking the above into account, it is unlikely that the Strategic Sites listed in the trajectory will deliver 6,795 new homes. A more conservative estimate would be 5,000 new homes – reducing SD3, SD5 by 50% and SD8 by 25% and increasing SD2 to 800 completions.
- 5.29 This adjustment alone would mean that the number of completions by 2031 is substantially less than 20,000 over the plan period.

Local Plan Review

- 5.30 The LPA are required to update their Local Plan every five years. In July 2020, it adopted a Local Development Scheme which set out this plan making timetable. That anticipated that the Local Plan Review would be adopted at the end of 2023. In September 2021, a Report to Planning Policy Committee identified that that published timetable was already subject to 12-month slippage (i.e., adoption at the end of 2024 at the earliest). Moreover, Members have recommended to pause the plan-making process by six months, which in effect means some four years before a new Local Plan is in place. This was approved at a Council Meeting in November 2021.

Standard Method

- 5.31 Since the Local Plan was adopted in 2018, the Government published revisions to the NPPF in 2018, which, *inter alia*, introduced the Standard Method for calculating local housing need. The Housing Trajectory referred to in the AMR is based on the Local Plan requirement in policy H SP1. That did not take account of the Government's more recent approach to calculating the Standard Method as set out in the NPPF.
- 5.32 The Standard Method provides a level of local housing need of 1368dpa; this represents a 48% increase over the earlier level of objectively assessed need which the Local Plan is based on. The scale of the housing requirement in Arun is clearly increasing rather than reducing with the associated need to increase the amount of land identified for housing delivery.
- 5.33 Across the West Sussex Coastal area, the level of housing required using the Standard Method increases to 4,886dpa compared with the existing requirement in Local Plans of 2,747dpa. It is evident that the need to increase housing supply exists across the sub-region.
- 5.34 Accordingly, the proposed development will provide a beneficial role in meeting the need for new housing in both the short and long terms.



Action Plan

- 5.35 In June 2019, the Council published an Action Plan. Amongst the identified “actions” is “invite application from landowners/developers on ‘deliverable’ HELAA sites to re-establish 5 year HLS”. This illustrates the Council understand it must grant planning permissions on sites other than those allocated for housing in the adopted Local Plan.

Arun Interim Housing Statement

- 5.36 In view of the above, and in recognition of the need to improve housing land supply, the District Council published an Interim Housing Statement in February 2021. This sets out national and local planning policies considerations that applicants for housing development should seek to address.
- 5.37 *Appendix 8* responds to this RAG rating system. There is a high degree of compliance with the criteria set out therein, illustrating the many suitabilities of the Site and the advantages of the proposed development. The exceptionally good manner in which the proposed development accords with those criteria is a material consideration in the determination of this application.



6 The Planning Balance

- 6.1 In the previous Sections, the planning policy context has been discussed along with the housing land supply position in the District.
- 6.2 Whilst there is conflict with certain of the Development Plan's policies, the planning balance inherent in Section 38(6) of the Act requires material consideration to be taken into account in determining the application.
- 6.3 In this instance, this balancing exercise must consider:
- a. the site being outside the built-up area boundary in the Local Plan and the Neighbourhood Plan and subject to restrictive policies;
 - b. the site being subject to the provisions of the Gap policy which seeks to prevent coalescence and retain the identity of the settlements concerned;
 - c. the unanswerable need to increase the supply of housing land in the District to meet Arun's growth needs, the delay in the local review to address this and the benefit the proposed development will have in improving the supply of market and affordable homes;
 - d. the range of extensive and significant benefits that the proposal can secure for the local community, especially around the green infrastructure proposals in providing publicly accessible areas of informal open space and habitat creation;
 - e. the high degree of compliance that the site and the scheme have with the Council's Interim Housing Statement;
 - f. the benefits to the Golf Club as a local facility of being able to relocate.
- 6.4 This planning balance is discussed in the following passages, demonstrating how the benefits of the proposed development clearly and demonstrably outweigh the conflict with the development plan.

The principle of the Site's development for housing

- 6.5 The Application Site is not identified for new housing development in the adopted Local Plan or made Neighbourhood Plans and the development proposals would conflict with Policies SD SP2 and C SP1 of the Local Plan and Policy H2 of the Felpham Neighbourhood Plan and Policy BB1 of the Yapton Neighbourhood Plan.
- 6.6 These are important policies in the determination of this application. However, in this instance, the identified shortfall of housing land supply discussed in Section 5 is considerable and on-going. As such the degree to which the application site and the proposed development meet the criteria set out in the Council's Interim Housing Statement is highly relevant in this circumstance. Also relevant are the benefits that the provision of a new golf course with additional facilities provides and the fact that this is enabled by the housing scheme.
- 6.7 In all other respects, the proposed development accords with both the Policies in the Local Plan and the Neighbourhood Plans to the extent they are relevant to determining an outline planning



application. The Design and Access Statement provides a wholly suitable framework for the detailed design of the scheme to ensure that the requirements of policies that apply to a greater extent at that stage in the planning process can be satisfactorily met.

- 6.8 In terms of the Site's suitability, it is instructive that the Council's Housing and Employment Land Availability Assessment published in 2020 indicates that this site is "developable", subject to policy and environmental considerations. The material submitted with this application demonstrates how development can be accommodated satisfactorily.

Preventing coalescence and maintaining separate identities

- 6.9 Policy SD SP3 is also an important policy in determining this application. As a matter of principle, the Policy does not preclude new development, but requires the decision maker to judge the individual development proposals against criteria designed to prevent coalescence and retain the identity of the settlements concerned.
- 6.10 It is instructive that the Local Plan Inspector's Report highlights that "*the Council accept that future development needs could be met within the gaps providing their overall integrity is maintained*" (para 44 refers).
- 6.11 The qualification that followed from this is "criterion e" of the Policy which intended to allow the Non-Strategic Sites DPD to make future allocations in such locations. That plan making process has fallen away but is a clear acknowledgement that the Gaps are not immutable.

- 6.12 The first and second criteria of Policy SD3 are the most relevant in the first instance:

Would the proposed development undermine the physical and/or visual separation of settlements?

Would the proposed development compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development?

- 6.13 The proposed development will change the character of the Site; fairways will be replaced by built development, new landscaping (including parkland), water features and habitat creation. New housing is contained to the eastern and central body of the site and the western, northern and southern extents will provide the majority of the development's Green Infrastructure – 70% of the site will be Green Infrastructure.
- 6.14 In landscape and visual terms, the nature of the corridor along the eastern bank of the Lidsey rife will be different, reflecting the change in character resulting from the development. When viewed from alongside the rife views along existing golf course fairways which are orientated predominantly north to south will be replaced by blocks of new tree planting set within and alongside new meadow and wetland habitats. Views into the centre of the course will for the most part be screened through a combination of retained tree belts and new planting. Views over the Green Infrastructure described will enhance one's outlook and experience of the rife and its margins. In effect the experience will be of a mature park situated at the settlement's edge. Moreover, given that these areas are not currently accessible to the public, new footways providing public access to this major area of new greenspace is a benefit of the proposed development.
- 6.15 This change in character is different from the coalescence of the settlements; there will continue



to be separation between Felpham and Bognor. The intervening space, albeit reduced to a degree, will have a more productive and meaningful purpose balancing public amenity with habitat creation.

- 6.16 The character and separate identity of Felpham will not change materially either. Its morphology will be altered to a small extent, but the new housing will be an extension of the adjoining residential area. The parkland will, in perpetuity, better define the edge of the settlement with the intention that it serves as a community and nature resource rather than a manicured private space.
- 6.17 The function of this land within the gap will change, but the integrity of an open corridor between the edge of Felpham and Bognor will still exist.
- 6.18 In any event, the Local Plan intends that the character of the land between the existing edge of Bognor, defined by the railway line, and Felpham, changes in any event as it extends the Enterprise Bognor allocation eastwards and intends that new road infrastructure is built to serve this. Viewed in those terms, the proposed development provides an important public recreational and wildlife space. In all likelihood, green space will also need to be provided along the western extent of the site to similarly provide separation from the site, in effect mirroring the provision that is part of this scheme. This will contribute to maintaining separation and identity.

The need to increase the supply of housing land

- 6.19 The District Council's strategic objective for housing delivery is to:

"Plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirement and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities."

- 6.20 The District Council intends that local housing need, calculated by Policy H SP1 of its Local Plan, is met within the plan period. When measured against this adopted Policy, there has been a shortfall in housing supply, both in terms of completions so far in the plan period, and also in land available for new house building in the future.
- 6.21 In the context of the strategic objective and the evidence of housing delivery, there is unquestionably a need to improve housing land supply in the District and this is a material consideration in the determination of this application. As a matter of principle, in this situation, an application for new housing to increase housing land supply would attract support from the Council.
- 6.22 This is underscored by the absence of the Non-Strategic Site's DPD; this is part of the reason why additional housing land needs to be brought forward by planning applications rather than through the plan led process.
- 6.23 The Council readily acknowledge this with the Interim Housing Statement, which provides a framework to enable planning permission to be granted on sites in addition to those in the Local Plan.



Compliance with the Interim Housing Statement

- 6.24 *Appendix 8* illustrates the extent to which the proposed development performs especially well against the criteria specific by the District Council; where there is a conflict, it is the same conflict that exists with the Development Plan and will inevitably exist in all cases where development proposals are advanced outside Built Up Area Boundaries.
- 6.25 The many suitabilities of the Site and the advantages of the proposed development are readily evident from this matrix and lends weight to the granting of planning permission. These include:
- a. New housing adjacent to a main settlement and its settlement boundary, conveniently located to a range of service and facilities
 - b. Development that does not impact on any national habitat, landscape or heritage designation
 - c. A green infrastructure strategy that protects and conserves wildlife and habitats and achieves a net gain in biodiversity consistent with the Biodiversity Opportunity Area and the Local Greenspace designation
 - d. The ability to provide a mix of housing that meets identified needs at a density that is appropriate to the local area and makes efficient use of land
 - e. A scheme that takes account of climate change and mitigates against its effects.
- 6.26 The substantial benefit the proposed development provides in adding to the supply of new housing would attract greater weight than the settlement boundary policies. This is especially the case where, as with the application site, it adjoins an established urban area which has previously been a suitable location for new development consistent with the Local Plan's spatial strategy and its focus on the Greater Bognor Regis Urban Area.

Bognor Regis Golf Club

- 6.27 By relocating the Golf Club, new and additional facilities can be provided that support the Club in its vision to provide an outstanding golf and social experience. This is explained in *Appendix 4*.
- 6.28 The current golf course suffers from a number of limitations:
- drainage issues that restrict play for long periods in the winter;
 - increasing concerns about health and safety with complaints from residents on the site's boundary;
 - poor energy efficiency and increasing costs of maintaining the club house;
 - limited and outdated facilities with significant upgrade costs.
- 6.29 Moving to a new site would provide the opportunity for BRGC to create a club that is the benchmark for Sussex, both on and off the golf course. It will provide commercial sustainability for the club by allowing them to grow their golf and hospitality offering and bring it into line with the current and modern needs of golf. Enabling the relocation of the golf course and the provision of new and different facilities is a material benefit of the proposed development.



7 Summary and Conclusions

- 7.1 This planning statement accompanies an outline planning application submitted by Hallam Land Management Ltd (Hallam) for the redevelopment of Bognor Regis Golf Club for new housing.
- 7.2 A separate planning application is being submitted for the relocation of the Golf course to land south of Grevatt's Lane. The relocation of the Golf course will provide the Golf Club with new and additional facilities.

The Application Site

- 7.3 The Application Site measures 39.6ha in size. The Site currently comprises the existing Bognor Regis Golf course and associated club house and car parking. Vehicular and pedestrian access is provided from Golf Links Road. The golf course comprises fairways, fairway trees and occasional drainage ditches. A practice green is also located close to the club house.
- 7.4 The Site is located to the north of Felpham and Bognor Regis and is adjacent to the north-western edge of the built-up area of Felpham. It is bounded to the west by Lidsey Rife, beyond which is the LEC Airfield, the railway line and areas of commercial development. To the north is the A259. To the east is the existing residential environs of Felpham and Downview Primary School to the south east. To the south are open fields extending to the B2259 and further afield Felpham

The Proposed Development

- 7.5 The submitted planning application seeks outline planning permission for the following proposed development:

Construction of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure. The retention and re-purposing of the retained club house (F2).

- 7.6 Of the reserved matters associated with an outline application, appearance, landscaping, layout and scale have been reserved for subsequent approval. Means of access via Golf Links Road is not reserved for subsequent approval.
- 7.7 A suite of parameter plans provide a pictorial explanation of the proposed development. These are the 'controlling' plan which will govern the preparation of subsequent reserved matters applications.

The Decision Making Framework

- 7.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires an application for planning permission to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.9 In this instance, the relevant Development Plan is comprised of three principal documents:
- a. The Arun District Local Plan which was adopted in July 2018 and covers the period to 2031
 - b. The Felpham and Yapton Neighbourhood Plans



7.10 Material considerations comprise:

- a. the unanswerable need to increase the supply of housing land in the District to meet Arun's growth needs, the delay in updating the local plan to address this and the benefit the proposed development will have in improving the supply of market and affordable homes;
- b. the range of extensive and significant benefits that the proposal can secure for the local community, especially around the green infrastructure proposals in providing publicly accessible areas of informal open space and habitat creation;
- c. the high level of performance that the site and the scheme have with the Council's Interim Housing Statement;
- d. the benefits to the Golf Club as a local facility of being able to relocate.

The Planning Balance

- 7.11 The Application Site is not identified for new housing development in the development plan and would conflict with its settlement boundary and countryside policies. The Gap Policy is also relevant, but as a matter of principle, that Policy does not preclude new development, but requires the development scheme to reflect the importance of maintaining separation between two settlements so that they retain their individual character and in turn the decision maker to judge the individual development proposals against criteria designed to protect the integrity of the separation between settlements.
- 7.12 These are important policies in the determination of this application, but they must be considered in the context of material considerations identified above.
- 7.13 The proposed development will make **a significant contribution to the need to increase housing land supply, and this attracts substantial weight** in the decision-making process.
- 7.14 Whilst the proposed development will change the character of the Site the new housing is contained to the eastern body of the site and the western, northern and southern extents will provide considerable tracts of green infrastructure. Whilst the nature of the gap between Felpham and Bognor will change, **the significant areas of publicly accessible green infrastructure and habitat creation and biodiversity net gain is a substantial public benefit.**
- 7.15 The fact that this scheme does not result in the loss of a recreational facility is also germane; the new and different facilities available at the new golf course represent a qualitative and quantitative improvement that can support the Golf Club in its ambition to improve its offer. **Enabling the relocation of the golf course and the provision of new and different facilities is a significant benefit of the proposed development.**
- 7.16 The many suitabilities of the Application Site and the advantages of the proposed development are widely evident from the number of policy objectives in the District Council's Interim Housing Statement that are met. The high degree of compliance exhibited in these terms attracts substantial weight in the circumstances that exist.

Conclusion

- 7.17 The substantial benefit that 480 new homes would provide to meeting the identified need for



housing, the other benefits arising from this proposed development and the corresponding benefits arising from relocating the existing golf course, attract such weight to outweigh the conflict with the settlement boundary policy.

- 7.18 Moreover, the development has been arranged within the established and proposed landscape framework of the Site such that it retains separation between settlements. The comprehensive green infrastructure proposals adjacent to the Lidsey Rife are beneficial and deliver a number of the Local Plan's policy objectives.
- 7.19 Importantly, the evidence established through up-to-date flood modelling illustrates that development can be located outside of areas of flood risk consistent with the NPPF and in accordance with the Local Plan's policy.
- 7.20 The proposed development performs exceptionally well when assessed against the framework specifically set out by the Council to consider planning applications for new housing on sites not allocated for housing. The extent of its performance in these terms is a material consideration that weights in favour of planning permission being granted.
- 7.21 For these reasons, and notwithstanding the Application Site's status in the Development Plan, there are material consideration that indicate planning permission should be granted.



Appendix 1

Site Location Plan (171-UW-P-A-001)



NOTES

All dimensions to be verified on site. Do not scale this drawing. All discrepancies to be clarified with project Landscape Architect.

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KEY

Application Site Boundary

Site Area = 39.6ha

First Issue

14 Dec 21



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Halham Land Management

Bognor Regis

Existing Golf Club

Red Line Boundary

FOR PLANNING

14 Dec 21

1:500 A1

171/LW/P.A-001



Appendix 2

Access Drawing (JNY10830_04D)

NOTES

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3. This drawing is to be read in conjunction with all relevant scheme drawings.

Key:

----- Extent of public highway

For swept path analysis see drawing
JNY10830-11A

Rev	Description	By	CB	Date
D	Following RSA	AJ	MA	25.11.21
C	Shutter Drive arm adjusted	AJ	MA	10.11.21
B	Table Top Ramp & Footway cycleway added	MA	MA	10.10.21
A	Vis splay added and access realigned	AJ	MA	11.10.21



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Client Hallam Land Management

Project Bognor Regis

Title Proposed Site Access

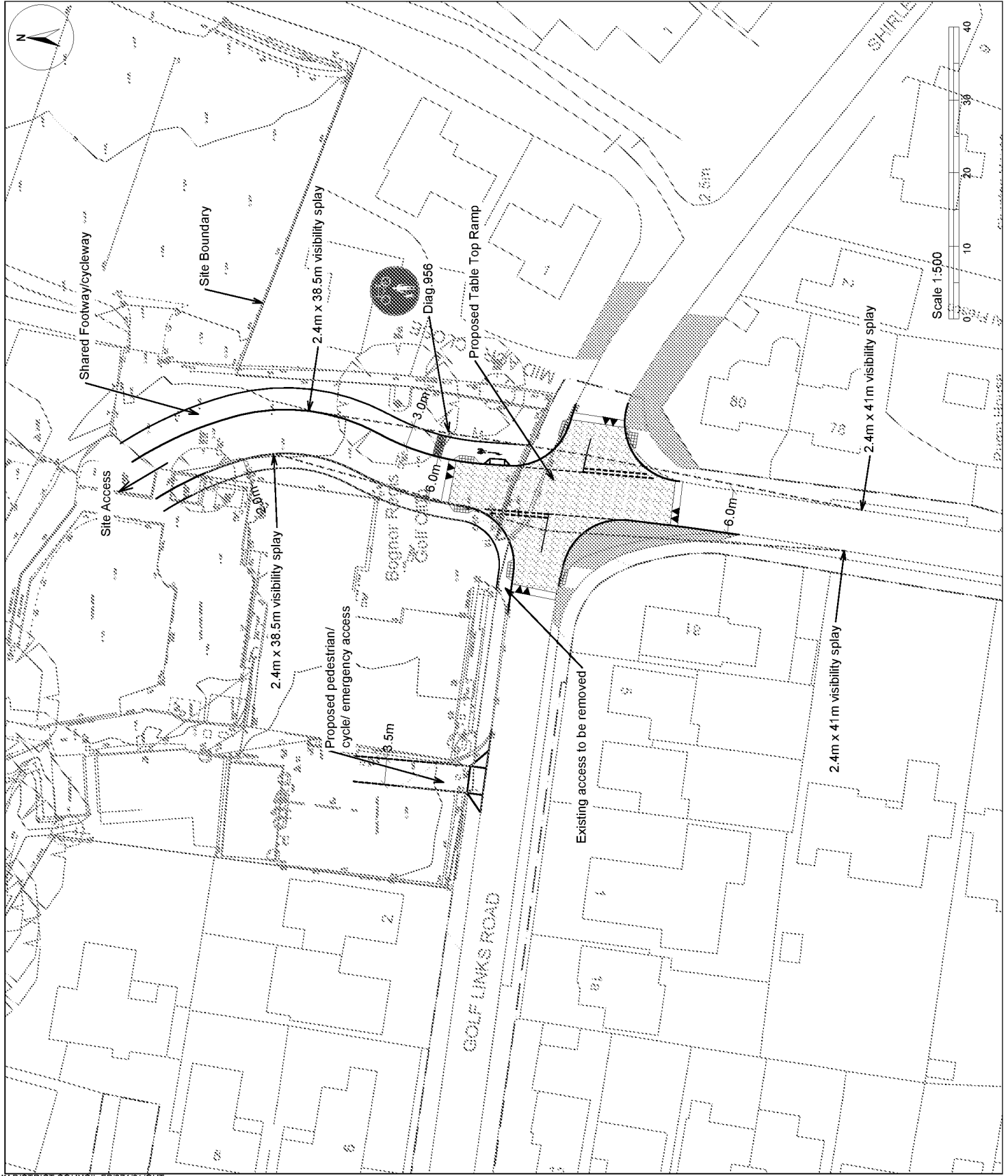
Status Drawn By FMS/Checked by MA

Project Number Scale @ 1:500 Date Created 21/09/21

RPS Drawing Figure Number Rev

JNY10830-04 D

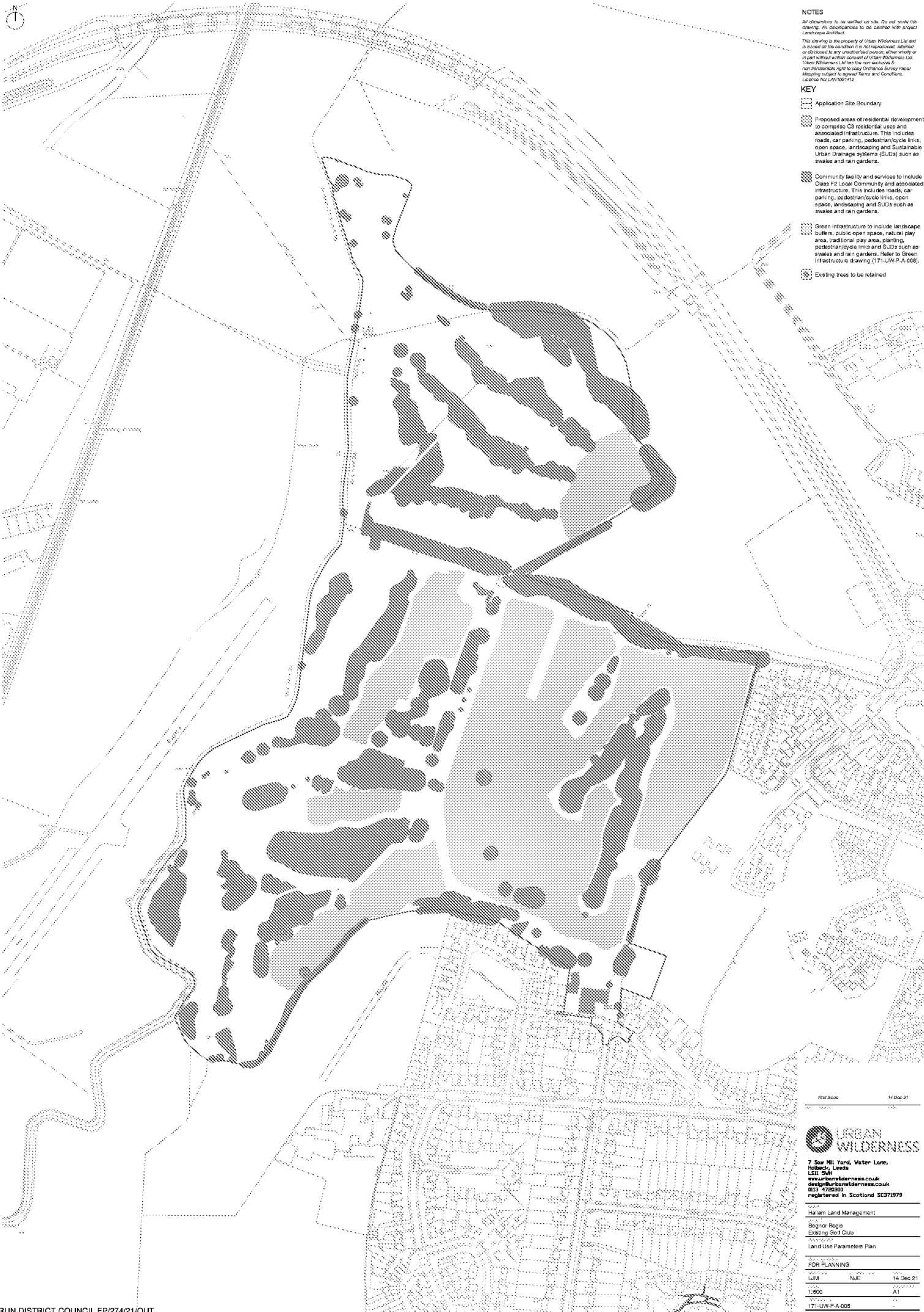
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Appendix 3

Parameter Plans



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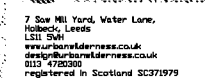
Application Site Boundary

Proposed areas of residential development to comprise C3 residential uses and associated infrastructure. This includes roads, car parking, pedestrian/cycle links, open space, landscaping and Sustainable Urban Drainage systems (SUDs) such as swales and rain gardens.

Community facility and services to include Class F2 Local Community and associated infrastructure. This includes roads, car parking, pedestrian/cycle links, open space, landscaping and SUDs such as swales and rain gardens.

Green infrastructure to include landscape buffers, public open space, natural play areas, local play areas, pedestrian/cycle links and SUDs such as swales and rain gardens. Refer to Green Infrastructure drawing (T17-UW-P-008).

Existing trees to be retained

[illegible]

Boagor Regis

Land Use Parameters Plan

LJM NJE 14 Dec 21

171-UW-P-A-005	"
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KEY

- Application Site Boundary
- 90 dwellings per hectare (including masonettes)
- 45-80 dwellings per hectare
- 40-44 dwellings per hectare
- 35-38 dwellings per hectare
- Existing golf club house, to be re-purposed as community hub facility

Average density = 40dph

Total = 480 units

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Halifax Land Management

Bognor Regis

Existing Golf Club

Development Density Plan

FOR PLANNING

Drawn by LJM Checked by NJE 14 Dec 21

1:500 A1

171-UM-P-A-006



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KEY

- Application Site Boundary
- Maximum 2 storeys - up to 8m to eaves above ground level
- Maximum 2.5 storeys - up to 9.5m to eaves above ground level
- Maximum 3 storeys - up to 12m to eaves above ground level
- Existing golf club house and maintenance buildings



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Urban Wilderness Ltd

Bognor Regis

Existing Golf Club

Building Heights

FOR PLANNING

1:2000 14 Dec 21

171/LW/P-A-007



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KEY

- Application Site Boundary
- Retained and proposed open space within wider green infrastructure
- Existing trees to be retained
- Areas of proposed tree planting
- Proposed singular tree planting
- Key areas of ecological value and enhancement
- Proposed growing areas
- Proposed native hedgerows
- Existing ditch/drainage network
- Proposed ditches & swales
- Proposed SUDs
- Existing pond to be retained
- Existing Public Rights of Way (PROWs) to be retained

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Client: Halton Land Management

Design: Bognor Regis

Existing: Golf Club

Green and Blue Infrastructure

FOR PLANNING

Author: LJM Date: 14 Dec 21

Checker: NJE Date: 14 Dec 21

Scale: 1:2000 A1

Project: 171 LUW P.A.005



NOTES

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KEY

- Application Site Boundary
- Proposed primary roads - tolerance of 10m either side
- Proposed secondary roads - indicative locations with tolerance of 20-30m
- Proposed private driveways and access roads - indicative locations with tolerance of 20-30m
- Proposed emergency access
- Potential future vehicular link to the surrounding area
- Safeguarded route for future Felpham - A259 link road - tolerance of 10m either side
- Proposed primary footpaths and cycle links
- Proposed permissive public footpaths
- Potential future pedestrian/cycle link to the surrounding area
- Existing Public Rights of Way (PROW) to be retained and upgraded
- Proposed car parks

First Issue

14 Dec 21



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Halham Land Management

Bognor Regis

Existing Golf Club

Movement and Connectivity

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1:2000 A1

171 LUW P.A-005



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KEY

- Application site boundary
- Retained and proposed open space within wider green infrastructure
- Existing trees required for removal
- Total loss of Cat A trees:
1 specimen
- Total loss of Cat B & C trees:
22 groups
13 specimens
- Total area of existing trees lost:
2.4ha
- Existing trees to be retained
- Proposed woodland and tree groupings
Total area coverage = 4.4ha
- Proposed singular tree planting
Total number circa 125
- Proposed native hedgerows

First Issue 14 Dec 21



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registered in Scotland SC371979

Client
Hailam Land Management

Design
Bognor Regis

Existing
Existing Golf Club

Document
Illustrative Tree Removal Plan

FOR PLANNING

Author LJM Date 14 Dec 21

Checker NJE Date

Scale 1:2000 A1

Project 171-LW-P-A-010



Appendix 4

Bognor Regis Golf Club Position Statement



Introduction: Golf Transition Management (GTM) have been engaged by Hallam Land Management (HLM) to guide Bognor Regis Golf Club (BRGC) through their relocation planning process. GTM have worked alongside the senior team at BRGC for over 8 weeks intensively and held scoping sessions with the main board to ensure they had given due consideration to the wider opportunities a relocation could offer BRGC and the local area.

Challenges: For many years golf has seen a decline in the number of golfers transitioning from casual, fun golf into golf club membership (see appendix 1 & 2). Per image 1, golf club membership has shown a consistent decline for over a decade, with very few clubs reversing this trend. However, image 2 shows that golf is buoyant, especially when using shorter forms of play. The site limitations at BRGC mean that only the more traditional forms of golf are on offer e.g. a four/five-hour round, as well as the facilities for members becoming dated. So BRGC suffered the same as most other clubs. More recently they have introduced a flexible membership offering which has seen them attract younger golfers to the club and their average age has reduced. The pandemic has also seen golf have a mini boom, but it is predicted that by the summer of 2022 numbers will return much closer to 2019 figures (see Appendix 2) as many people are no longer working from home and much of life is returning to pre pandemic routine which mean time issues will reappear.

The current site limitations will create some significant challenges for the club in the near future.

- Drainage issues;** For long periods of the winter the course is restricted due to ongoing drainage issues
- Health and Safety;** We are also receiving complaints of golf balls hitting houses on our boundary
- Cost efficiencies;** The clubhouse is an old barn style building resulting in energy efficiency being poor
- Limited/outdated facilities;** Poor practice facilities and ongoing costs maintaining an old inefficient building
- Replacement and refurbishment costs;** From our irrigation system through to the clubhouse heating system the cost of replacement is significant but required.

Opportunities: The club has reduced its average age from 68 to 57, with the average age of the new members over the last three years being 47 with the introduction of a more flexible membership. This shows the club slightly ahead of the wider golf industry trend, however it will be incredibly hard for the club to evolve any further without relocating. Growing the facilities is simply not possible on the current site, they are cramped in already with the site being less than 100 acres. Practice facilities are limited and there is no space for anything additional to help create more time bound / shorter forms of play and practice.

The design of the course for the new site has returning loops of nine holes allowing for 9 or 18 holes to be played. The course will be genderless with four sets of different teeing off positions. This will create a much shorter course as well as a longer course for more experienced golfers. The golf academy will allow the club to appeal to a totally new demographic of 'potential' golfer who can come and learn to play at BRGC. This facility will also cater for golfers who are time poor as well as older golfers who cannot manage the main course.

New facilities:

- 9-hole par 3 course
- Short game area, including bunkers and extensive chipping and pitching areas
- Large putting green
- Covered bays and open driving range with ball tracing technology

The business model that BRGC will develop will see them become 'hybrid' club. They will still be 100% a member's club, but they will be opening their doors and operating on a professional footing and futureproofing the club by

welcoming a wider range of golfer and potential golfer. A new points-based membership system will see inclusive membership become more limited to be replaced in part by a points based system. Points based membership is positioned towards golfers with less time available. BRGC current statistics show they can replace one inclusive member with three points-based members because points-based members use the facilities differently. Golf yield will increase as will site visits through a greater use of the peripheral golf facilities (range, practice greens, par three course) that offer shorter time windows to play. In turn the increased membership numbers will bring much needed additional revenue into the hospitality part of the club. It is also the club's intention to create facilities and a culture that welcomes outside businesses into the club.

The club's aim is to create a course and facilities that will see it become the premier members club in its marketplace. The course designers, European Golf Design (EGD) have a pedigree of creating internationally renowned golf courses. There is no reason to doubt they will create a course that will significantly move BRGC's market position.

The revenue streams across the club will significantly increase through a wider membership, a much increased footfall of members and visitors and increased golf and hospitality choices.

Vision for The Future

Relocating to the new site and creating a modern venue that provides golf, service and hospitality that are recognised as the benchmark for Sussex is fundamental in how the club intend to deliver their vision.

BRGC are building upon the skills, knowledge and momentum the current leadership have delivered over the last six years and working with industry specialists to design a course and facilities fit for the future. BRGC are perfectly placed to create something incredibly special for their members, guests, and the wider community.

BRGC VISION

"To establish Bognor Regis Golf Club as a leading Members' Golf Club and to ensure an outstanding golf and social experience for our members, their families and our guests."

BRGC STRATEGIC OBJECTIVES

- To acknowledge our heritage and embrace the future.
- Build and maintain a welcoming and inclusive environment and culture for our members, future members, their families, and guests.
- Provide and upkeep facilities - course, clubhouse, and ancillaries - that will be the benchmark for clubs in Sussex.
- To manage our club under a sustainable fiscal policy.
- To repay members for their loyalty by delivering fantastic value and a first-class level of service.
- To be progressive and not reactive, we must provide a range of innovative memberships that ensure there is a clear membership pathway in place to suit the needs, ages, and demographics of modern golfers.
- To provide for our employees by delivering a safe, welcoming, and progressive workplace where they can develop their skills and achieve their goals whilst delivering these Aims.

As above, BRGC intend to be progressive and not reactive. Having moved away from an outdated committee model of governance they now have a Board of Directors supported by a strong management team. They have a clarity of vision and an inclusive culture they are striving to be progressive whenever possible.

Note: Their current General Manager, James McLean, was recently awarded Golf Club Manager of the Year, for the great work he did throughout the pandemic and before that in positively influencing the profile of the club's membership.

Outlook: The future for the club, if relocated, will be incredibly bright, with the aim to create a modern hospitality offering that is much more inclusive than a traditional clubhouse has a reputation of being. The new facilities are being designed with modern multi use spaces being available for all ages of members and guests. The leadership of the club are also aware of the need to bring in hospitality revenue from outside the membership so these multi use spaces will be available for local residents and businesses to use also.

A key objective is to recognise the growing membership have modern needs and wants. There is a need for the facilities to cater for the whole family with spaces designed to suit the needs of specific groups for example family areas with baby changing facilities close by or quiet spaces for working members to utilise and meeting rooms with great audio-visual functionality for both the membership and outside business.

The contemporary spaces that are being planned for the new venue so far are:

- 185-seater restaurant and bar
- Family space
- Meeting rooms x 3
- Changing facilities
- Sports room
- Pro shop
- Bag Store
- Baby changing facilities
- Staff areas, including changing room and quiet space
- Outside alfresco dining spaces

NEW Turf Care Centre: The new venue will have a purpose-built Turf Care Centre which will enable the turf maintenance team to prepare the course and additional practice facilities to the highest standard. The science of turf-care is leaning more and more towards sustainable methodology and the skill set needed to undertake modern turf-care needs the support of specialist machinery that is maintained professionally. It is the intention of BRGC to provide for their team to ensure they have best facilities to help maintain their brand-new golf course to the highest standard.

In line with BRGC intention of becoming the premier members club it is a vital component that the new course is maintained to a benchmark standard. Investing in their facilities is key, but equally as important is supporting the professional turf care team in their ongoing education in turf maintenance.

Whilst many of the component parts of the facilities are already in place at the current site, they are tired, outdated and in many cases almost not fit for purpose anymore. The new maintenance facilities will offer the team modern welfare areas, much more space and specialist departments to boost efficiency and support our turf care team.

- Grinding room
- Chemical store
- Welfare facilities
- Training room
- Shower and changing facilities
- Wash down areas

Note: Over the last thirty years there have been very few new golf courses built within the UK. In this time turf maintenance and many of its methods have advanced significantly. Building a brand-new golf course and then having the opportunity to be part of 'growing it in' will provide the team with an unparalleled experience. Helping incubate and nurse the course to life and then maintaining it through its infancy while learning about all the component intricacies that have to come together will be a once in a lifetime experience for the team.

Summary Outlook: With a modern membership offering to cater for the changing profile of golfers needs, complimented by a course and facilities that will be the benchmark for Sussex it is widely anticipated that BRGC will not only enhance their brand, but they will also offer a completely new golfing experience for their members, guests and visitors. This will create a platform for futureproofing the club's financial security. Increased visitor numbers both into hospitality and onto the golf course will create new and untapped revenues for the club.

The diversity of the various income streams will also create a stability that is missing from the current model/venue. The current course has drainage issues and suffers terribly during winter with play often restricted. This has a significant impact on peripheral income streams. Also, the limitation of the current clubhouse offers very little in the way of multifunctionality.

Conclusion: It is my opinion whilst the club have navigated the covid pandemic better than most, the limitations of the current site and some of its fundamental issues will certainly become a much bigger problem for the club before too long. Many of these issues such as safety and encroachment are never going to be resolvable. Moving home to the new site will almost certainly future proof the long-term wellbeing of the club as well as delivering a golf and hospitality venue that will gain national recognition.

Phil Grice
Founder GTM

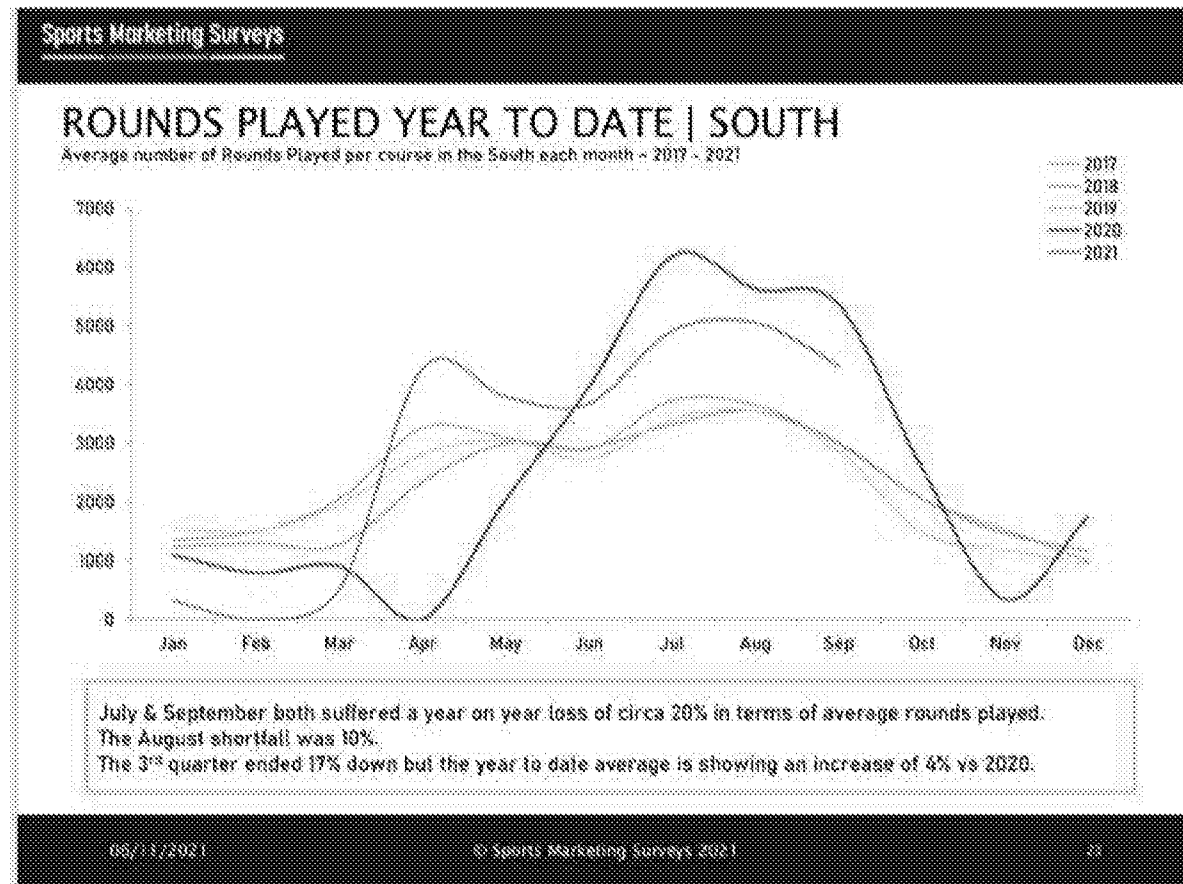
Both Appendix are courtesy of Sports Marketing Surveys. 2018 & 2021

Image 1.

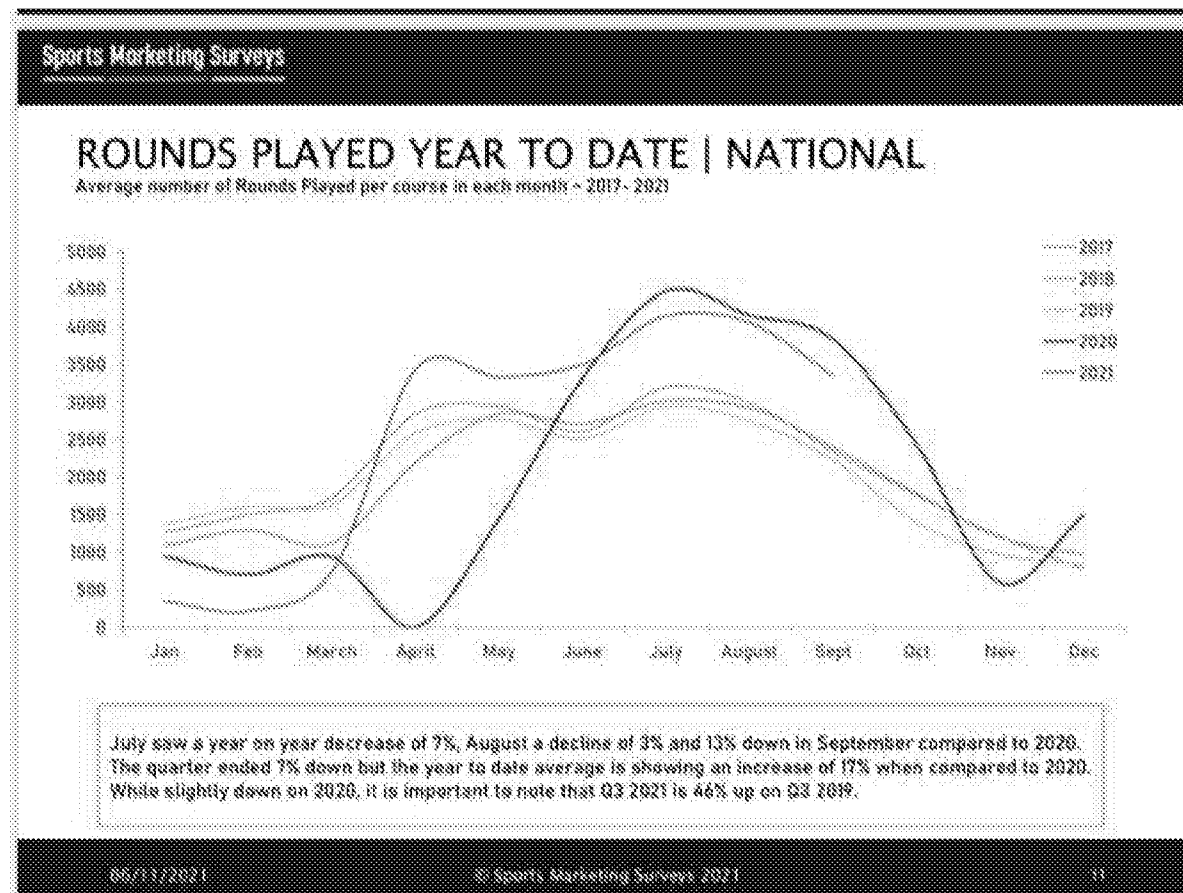


Appendix 2.

Image 1.



Slide 2





Appendix 5 List of Planning Application Documents

Document/Plan/Drawing	Date / Reference
Application Forms	December 2021
Covering Letter	December 2021
Site Location Plan	171-UW-P-A-001
Land Use Parameter Plan	171-UW-P-A-005
Development Density Parameter Plan	171-UW-P-A-006
Building Heights Parameter Plan	171-UW-P-A-007
Green and Blue Infrastructure Parameter Plan	171-UW-P-A-008
Movement and Connectivity Parameter Plan	171-UW-P-A-009
Tree Retention Plan	171-UW-P-A-010
Illustrative Masterplan	171-UW-P-A-011
Proposed Site Access	JNY10830_04 D
Demolition Plan	171-UW-P-A-012
Topographical Survey (9 sheets)	70014820-BRGC-TOPO
Planning Statement • Affordable Housing Statement • Planning Obligations - Draft Heads of Terms • Interim Housing Policy Statement	December 2021
Design and Access Statement	December 2021
Sustainability Statement	December 2021
Statement of Community Involvement	December 2021
Sequential Test	December 2021
Residential Travel Plan	December 2021
Environmental Statement Volume 1 Non-Technical Summary	December 2021
Environmental Statement Volume 2 Main Text	December 2021
Environmental Statement Volume 3 Technical Appendices (see below)	December 2021
Environmental Statement Volume 4 Figures	December 2021

List of Environmental Statement Appendices

Appendix 1.1	Location Plan Site A
Appendix 1.2	Location Plan Site B
Appendix 2	Not Used
Appendix 3.1	Land Use Parameter Plan
Appendix 3.2	Development Density Parameter Plan
Appendix 3.3	Building Heights Parameter Plan
Appendix 3.4	Green and Blue Infrastructure Parameter Plan
Appendix 3.5	Movement and Connectivity Parameter Plan
Appendix 3.6	Tree Removal Plan
Appendix 3.7	Arboricultural Assessment (Site A)
Appendix 3.8	Access Drawing Golf Links Road



Appendix 3.9	Golf Course Land Use Parameter Plan
Appendix 3.10	Arboricultural Assessment (Site B)
Appendix 3.11	Access Drawing Grevatt's Lane (A259)
Appendix 4.1	Scheme Details for Cumulative Assessment
Appendix 5	Not Used
Appendix 6	Not Used
Appendix 7.1	Policies relating to Landscape
Appendix 7.2	Landscape Character Assessment
Appendix 8.1	Legislation and Policies relating to Ecology
Appendix 8.2	Ecological Appraisal (Site A)
Appendix 8.3	Bat Report (Site A)
Appendix 8.4	Breeding Bird Report (Site A)
Appendix 8.5	Great Crested Newt Report (Site A)
Appendix 8.6	Hazel Dormouse Report (Site A)
Appendix 8.7	Reptile Report (Site A)
Appendix 8.8	Riparian Mammal Report (Site A)
Appendix 8.9	Biodiversity Offsetting Report (Site A)
Appendix 8.10	Ecological Appraisal (Site B)
Appendix 8.11	Biodiversity Net Gain Calculation
Appendix 9.1	Flood Risk Assessment (FRA) for Site A
Appendix 9.2	Surface Water Drainage Strategy (SWDS) for Site A
Appendix 9.3	Flood Risk Assessment for Site B
Appendix 10.1	Transport Assessment (Site A)
Appendix 10.2	Transport Assessment (Site B)
Appendix 11.1	Detailed Construction Dust Assessment
Appendix 11.2	Construction Dust Risk Assessment (Site A)
Appendix 11.3	Construction Dust Risk Assessment (Site B)
Appendix 11.4	Air Quality Model Verification
Appendix 11.5	Emissions Mitigation Calculation
Appendix 12.1	Consultation with ADC concerning scope of Noise Assessment
Appendix 12.2	Legislation and Policy related to Noise
Appendix 12.3	Noise Monitoring Locations
Appendix 12.4	Baseline Noise Monitoring Report
Appendix 12.5	Road Traffic Noise Change Assessment
Appendix 12.6	ProPG Report
Appendix 13.1	Preliminary Conceptual Site Model (Site A)
Appendix 13.2	Preliminary Conceptual Site Model (Site B)
Appendix 14.1	Agricultural Land Classification
Appendix 15	Not Used
Appendix 16	Not Used
Appendix 17.1	Potential Significant Waste Effects
Appendix 17.2	Legislation and Policy relating to Waste
Appendix 18.1	Heritage Desk Based Assessment (Site A)
Appendix 18.2	Heritage Desk Based Assessment (Site B)
Appendix 18.3	Geophysical Survey (Site B)



Appendix 6 Affordable Housing Statement



LIDSEY GREEN

AFFORDABLE HOUSING STATEMENT

December 2021



Report Control

Project: Bognor Regis Golf Course

Client: Hallam Land Management Limited

Job Number: 20.211

File Origin: [https://lmapplanninglimited.sharepoint.com/20/20.211 Bognor Golf Course/9 Applications/Site A/Planning Documents/Affordable Housing Statement/word version/211214 Affordable Housing Statement .docx](https://lmapplanninglimited.sharepoint.com/20/20.211%20Bognor%20Golf%20Course/9%20Applications/Site%20A/Planning%20Documents/Affordable%20Housing%20Statement/word%20version/211214%20Affordable%20Housing%20Statement.docx)

Document checking

Primary author: Owen Jones

Initialled: OJ

Review by:

Initialled:

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1 Introduction

1.1 This Affordable Housing Statement accompanies an outline planning application submitted on behalf of Hallam Land Management Limited for residential development at Bognor Regis Golf Club, Felpham.

1.2 The submitted application seeks planning permission for:

Construction of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure. The retention and re-purposing of the retained club house (F2).

1.3 Matters not reserved for subsequent approval relate to access from Golf Links Road.

1.4 As part of the proposed development, new affordable housing is to be provided. Policy AH SP2 of the Arun Local Plan requires 30% of new homes to be provided as affordable homes, equating in this instance to up to 144 new affordable homes.

1.5 This Statement provides an overarching explanation of the affordable housing element of the proposed development, the framework provided by relevant tiers of planning policy, and the scheme's compatibility with Development Plan policy. In terms of its structure, it comprises:

- Section 2: provides contextual information;
- Section 3: explains the Local Plan policy for Affordable Housing;
- Section 4: describes the proposed affordable housing provision; and
- Section 6: provides a summary.



2 Contextual Information

- 2.1 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may be taken into account in deciding planning applications.
- 2.2 The National Planning Policy Framework (NPPF) was updated in 2021. Paragraphs 7 to 10 explain the purpose of the planning system as a means of achieving sustainable development, with Paragraph 8 identifying its' three dimensions, namely social, economic and environmental, which are interdependent and need to be pursued in mutually supportive ways.
- 2.3 The social dimension is described in the following terms:

Social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

- 2.4 Paragraph 60 confirms that the Government's objective is to significantly boost the supply of homes. To achieve this, it is important that the needs of groups with specific housing requirements are addressed.

- 2.5 Paragraph 62 states that:

...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.)

- 2.6 Paragraph 63 states that:

Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

The agreed approach contributes to the objective of creating mixed and balanced communities.

- 2.7 Paragraph 65 states that:

Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. (Certain other exemptions are also listed.)

- 2.8 In May 2021 a Written Ministerial Statement was issued concerning First Homes, and the Government's Planning Practice Guidance was updated. A minimum of 25% of all affordable



housing units secured through developer contributions should be First Homes. This is a national threshold which should be applied for England.

2.9 The *transitional arrangements* set out in the PPG would, in this instance, indicate that the First Homes requirement exists as a matter of principle.

2.10 The Government's definition of affordable housing constitutes the following:

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidized route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);(b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider);and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

2.11 Within this context, there exists an established affordable housing need in Arun District which is discussed in the following sections.



3 Local Planning Policy

3.1 The Arun District Local Plan was adopted in July 2018 and is part of the Development Plan for the purpose of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

3.2 Policy AH SP2 of the Local Plan states that:

"For all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on site to be provided as affordable housing on the same site in the first instance.

...The Council will negotiate the affordable housing tenure mix on development sites from an initial default position of 75% rent and 25% intermediate market housing.

Affordable housing must be visually indistinguishable from market housing with large groupings of single tenure dwellings or property types avoided. Affordable housing units shall be permitted in small clusters throughout development schemes".

3.3 This approach to tenure has to be read alongside the NPPF's emphasis on affordable home ownership, referred to in the previous Section and the May 2021 Written Ministerial Statement concerning *First Homes*.

3.4 The District Council is preparing an Interim Affordable Housing Policy to accommodate the Government's First Homes Policy in November 2021. This was considered by Planning Policy Committee at its meeting on the 30th November 2021 and is due to be considered at Full Council in January 2022. The effect of this Interim Policy would be that 33% of the affordable housing should be intermediate housing (i.e., 25% First Homes and 8% other Intermediate Home Ownership) and 67% rent.

3.5 In this context the tenure of the proposed development would be as follows:

Market Housing:	336
Affordable Housing:	144
First Homes:	36
Other Intermediate	12
Rent	96

3.6 The Local Plan policy also refers to a mix of housing types for affordable housing, providing the following approach:

- 1 bedroom 35 – 40 %
- 2 bedroom 35 – 40%
- 3 bedroom 15 – 20%
- 4+ bedroom 5 – 10%

3.7 Housing mix is discussed in the accompanying Planning Statement (Table 3.2). In broad terms, the indicative mix provides predominantly 1- and 2- bedroom affordable homes consistent with



this.

- 3.8 The Local Plan has informed the Applicant's approach to affordable housing proposed as part of the development as explained in the following section.



4 Affordable Housing Proposals

- 4.1 In the context of Policy AH SP2 and having regard to the District Council's Interim Affordable Housing Statement, the Applicant's affordable housing proposals are set out in Table 1.

Table 1: Applicant's Affordable Housing Proposals

Arun Policy Approach	Affordable Housing Proposals
30% affordable housing	Up to 30% affordable housing is to be provided: on the basis that planning permission is sought for up to 480 new homes with will comprise 144 affordable homes.
First Homes	Calculated as 25% of the total number of affordable homes - 36 First Homes
Other Intermediate	Calculated as 8% of the total number of affordable homes - 12 other intermediate homes
Affordable Housing for Rent	Calculated as 66% of the total number of affordable homes - 96 homes for rent
Affordable Homes Ownership	10% of the total number of homes required by the NPPF - 4 comprised of 36 First Homes and 12 Other Intermediate Homes, totalling 48.
Integration	Whilst layout is a reserved matter the guiding principles are that: • Pockets of affordable housing, both shared ownership and social rent, will be pepper-potted across the development. • Their positioning and layout will be carefully considered to ensure they are well integrated into the development, fronting on to key streets with easy access to the open space and local facilities. • There is no differentiation in quality between market and affordable housing.
Design	Affordable homes will comply with the Homes and Communities Agency Design and Quality Standards.
Accessibility	All affordable homes will be designed and constructed m4(2) (accessible and adaptable) standard. 10% of the affordable homes will be designed and constructed to m4(3) wheelchair user dwellings) standard.

Planning Obligation

- 4.2 The Applicant proposes that a planning obligation is entered into to secure the above affordable housing proposals and that an Affordable Housing Scheme is provided with the reserved matters application.



5 Summary

- 5.1 This Affordable Housing Statement accompanies a planning application submitted by Hallam Land Management Limited for residential development at Bognor Regis Golf Club, Felpham.
- 5.2 A long-established planning principle is that a community's need for affordable housing is a material planning consideration which may properly be taken into account in deciding planning applications.
- 5.3 As part of the proposed development, new affordable housing is to be provided, pursuant to Policy AH SP2 which seeks 30% provision.
- 5.4 Principles relating to tenure split, integration, design and accessibility have been specified herein and take account of the expectation in paragraph 64 of the NPPF for at least 10% of the total number of homes to be available as affordable home ownership and a minimum of 25% of affordable homes to be provided as First Homes. The Applicant intends that the affordable housing element of the scheme is secured by a planning obligation.
- 5.5 It is evident that the affordable housing element of the scheme reflects the established Development Plan policy and the NPPF, as a material planning consideration. The scheme's contribution to meeting the need for affordable housing is a material benefit that should properly be afforded substantial weight in the determination of the submitted application.



Appendix 7

Planning Obligations Draft Heads of Terms

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DRAFT HEADS OF
TERMS

December 2021



Report Control

Project: Bognor Golf Course

Client: Hallam Land Management Limited

Job Number: 20.211

File Origin: XXXX [https://lmapplanninglimited.sharepoint.com/20/20.211 Bognor Golf Course/9 Applications/Site A/Planning Documents/211207 Planning Obligations Draft Heads of Terms.docx](https://lmapplanninglimited.sharepoint.com/20/20.211%20Bognor%20Golf%20Course/9%20Applications/Site%20A/Planning%20Documents/211207%20Planning%20Obligations%20Draft%20Heads%20of%20Terms.docx)

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	Pedestrian and cycle improvements.....	6
	Safeguarding Land for the Bogner Enterprise Link Road	6



1 Introduction

1.1 Hallam Land Management Limited has submitted a planning application for residential development at Bognor Regis Golf Club, Felpham.

1.2 The submitted application seeks outline planning permission for:

Construction of up to 480 new homes (C3), the formation of a new means of access onto Golf Links Road, the creation of new surface water drainage, new landscaping and habitat creation, ground works and other infrastructure. The retention and re-purposing of the retained club house (F2).

1.3 Matters not reserved for subsequent approval relate to access from Golf Links Road.

1.4 It is intended that a Section 106 Agreement under the Town and Country Planning Act 1990 (as amended) will be prepared as part of the planning permission. This will be entered into by the Applicant, the landowner, Arun District Council and West Sussex County Council. This will set out the Planning Obligations associated with the grant of planning permission.

1.5 This document is to serve as a live record of Heads of Terms suggested for the planning obligations to be part of the Agreement which will be required to be entered into.

1.6 The Heads of Terms are in draft form and are subject to further discussion and/or agreement. The obligations proposed will be in accordance with Community Infrastructure Levy (CIL) Regulation 122 and the NPPF/NPPG.

1.7 The likely planning obligations take account of the fact that Arun District Council have in place a Community Infrastructure Levy and the proposed development will be liable for this.

1.8 Lastly, the obligations take into account evidence contained in the various documents submitted to the Local Planning Authority with the planning application where mitigation is suggested to be necessary and this is best secured as a planning obligation rather than a planning condition.



2 Community Infrastructure Levy

- 2.1 The Community Infrastructure Levy (CIL) in Arun came into force on the 1st April 2020. The proposed development is liable for CIL.
- 2.2 The Application Site is situated within Zone 5 - not within the urban boundaries in the Coastal Area - being that area to the south of the A259.¹
- 2.3 The CIL Rate in this Zone for residential development is £100 per m².²
- 2.4 Social Housing development can seek relief for the CIL charge.³
- 2.5 The CIL Regulations (Regulation 40) require that collecting authorities apply an index of inflation to keep the levy rate responsive to market conditions. The index figure is referred to as the "BCIS All-in Tender Price Index. The District Council has listed on its website the indexed figure for 1st January to 31st December 2022 as £99.40 per m². (<https://www.arun.gov.uk/annual-cil-rate-summary>)
- 2.6 The Charging Schedule explains that once CIL is operational (i.e., from the 1st April 2020 onwards) the number of Section 106 obligations will "significantly reduce" because those developments will be expected to pay CIL. Only a very low level of Section 106 contribution may be needed to address on-site mitigation.
- 2.7 The Council's Infrastructure Funding Statement 2020/2021 lists the infrastructure which the CIL receipt from this and other developments could be spent on. This has been reproduced below for convenience:
- **Public transport** service improvements.
 - **Education contributions** to meet the education capacity shortfall that non-strategic sites create beyond cumulative impact of the strategic housing allocations.
 - **Leisure and Recreation projects** including a new leisure centre to make up capacity shortfall that non-strategic sites create beyond the cumulative impact of strategic housing allocations.
 - **Green Infrastructure Priority projects**, including Active Travel route priorities and Arundel to Littlehampton Walking and Cycling Route (Policy T SP2 Littlehampton to Arundel Green Link).
 - **Waste Management projects:** Contributions towards the District's Household Waste Recycling Sites and a joint project between Arun District Council and Chichester District Council to reconfigure the Westhampnett Transfer station/Household Waste Recycling Site to increase capacity.
 - **Emergency services**, including expansion and improvements to Bognor Police Station and Littlehampton Police Station; Relocation or redevelopment of Littlehampton Fire Station;
 - **Strategic flood alleviation schemes** and flood prevention measures; maintain Black Ditch flood defences; maintain Arundel to Littlehampton flood defences; sustain flood defences at Arundel; Adaptive management measures at Pagham Beach; SuDS implementation other than

¹ Table 5.1 of the Charging Schedule (April 2020)

² Table 6.1 of the Charging Schedule (April 2020)

³ Para 8.2 of the Charging Schedule (April 2020)



site specific requirements.

- 2.8 The planning obligations listed in the following section for the proposed development do not therefore propose funding of these types of infrastructure and are limited to securing on-site mitigation that is directly related to the proposed development and necessary to make it acceptable in planning terms.



3 Draft Heads of Terms and Obligations

- 3.1 Having regard to the extent of infrastructure that will be funded by CIL, the following represents a list of the likely planning obligations that will be required in conjunction with the grant of planning permission for the proposed development.

Affordable Housing

- 3.2 Up to 30% of the dwellings within the development to be provided as affordable housing. The Affordable Housing Statement provides detail in respect of this.

Open space and green infrastructure

- 3.3 The Green Infrastructure Parameter Plan identifies areas of open space and green infrastructure; an open space and green infrastructure scheme will be required to set out the specification and management and maintenance regimes

Junction improvements

- 3.4 The following off-site junction improvements:

B2259 Felpham Way/ Downview Road – Drawing No. JNY10830/05 – These works will see the provision of staggered crossing facilities on Downview Road and Felpham Road which will be completed as part of a S278 Agreement.

B2259 Felpham Way/ B2132 Middleton Road – Drawing No. JNY10830/12 – These works include the widening of the B2259 Felpham Way west

Pedestrian and cycle improvements

- 3.1 The following improvements to footway/cycleway:

Upgrading of the existing PRow route 153 between the site boundary and The Strafford (Downview Primary School) to provide a surfaced route.

- 3.2 The potential is for this section of PRow route 153 to be upgraded to Bridleways permitting the use of cycles. However, these are across 3rd party Land and therefore a contribution towards the costs of these improvements will be provided upon approval of planning.

Safeguarding Land for the Bogner Enterprise Link Road

- 3.3 The Local Plan refers to an indicative route for the Enterprise Bognor Regis Link Road being safeguarded (Policy T SP3). The Movement and Connections Parameter Plan identifies a potential route for this drawing upon published information by Bognor Regis Town Council, entitled Enterprise Bognor Regis. The submitted planning application is not seeking permission for this Link Road and this has not been assessed in the EIA; rather a corridor of land has been identified at the northern extent of the Site, consistent with the Bognor Enterprise illustration, that will be safeguarded to facilitate the potential construction of that new road in the future. Hallam anticipate that should planning permission be granted, the Section 106 Agreement will include obligations, including making this land available and financing the construction of that section of



the Link Road (within the redline only), for delivery either by the District or County Council and subject to certain triggers being hit and criteria satisfied. For clarity, it will be the responsibility of other parties to secure planning permission for the Link Road and provide for its delivery on land outside of the application redline.



Appendix 8 Interim Housing Policy Statement

National Planning Policy Framework 2019 Considerations	RAG Rating (yes or no)	Commentary
Does the site avoid impacts on any national habitat, landscape or heritage designation?	Yes	The application site is not part of a designated habitat site. There are no nationally designated habitat sites within the application site. The application site is not part of a designated landscape. The proposed development would not have any direct effect of any nationally designated heritage asset.
Meet Appendix 2 Glossary Definition of Deliverable site?	Yes	The application site is available now, in a suitable location and housing could begin delivery within 5 years.
Sustainable location Adjacent to a Transport Node? Railway Station? Bus route? Walking and Cycling routes?	Yes	The site application site immediately adjoins the existing built-up area. It within walking and cycling distance of local facilities and services. A local bus route adjoins the site.
Density Maximises the use of land appropriate to accessibility and parking?	Yes	The proposed development will provide up to 480 new homes and an average density of 40 dwellings per hectares. This makes an efficient use of land.
Achieving well designed places?	Yes	The Design and Access Statement illustrates how a well-designed place can be created, reflecting principles in Arun's Design Guide.
Addresses Climate Change and low carbon future and energy standards Mitigation and Adaptation?	Yes	The Applicant intends that the proposed development achieves the Future Homes Standards with the use of low carbon technologies in line with Building Regulations at the time of implementation. The landscape strategy proposed suitable shading and shelter measures.
Addresses Climate change Flooding and vulnerability over the lifetime of the development (100 years)?	Yes	Climate change allowances have been taken into account on the flood risk assessment and drainage strategy (adaption).
Coastal Areas	Yes	Within the Bognor Coastal Belt
Protects and conserves wildlife and habits and achieves a 'net gain' in biodiversity?	Yes	The biodiversity net gain calculations for Site A have resulted in a habitat gain of 10.29%, which is a result of the GI that is being retained and enhanced to the west along Lidsey Rife and the newly created woodland and grassland habitats proposed. The hedgerow and river scores were also positive with 17.43% and 46.95% respectively.
Conserves and enhances the Historic Environment?	Yes	There are no designated heritage assets within the Application Sites. As such no designated assets will be directly impacted by the proposed development. Felpham Conservation Area is approximately 750m south of the Site. Listed Buildings are also this distance from the Site. No designated heritage assets are considered sensitive to change by the proposed development due to a combination of topography, the distance from the site and the built-up nature within they are located.
Safeguards Minerals and allows abstraction?	Not Applicable	The site is not within a Minerals Safeguarding Area.



Development Plan Considerations that may assist identification of sites of the right size in the right locations	RAG rating (yes or no)	Commentary
Within BUAB and settlement hierarchy?	No	The application site is located outside the defined Built up Area Boundary.
Outside but Physically Adjacent to BUAB	Yes	The application site is immediately adjacent to the defined Built up Area Boundary. As a matter of principle, development adjacent to the Great Bognor Regis Area is consistent with the Local Plan's Spatial Strategy
Remote from BUAB?	No	The application site is not remote from the Built Up Area Boundary.
Avoids Gaps Between Settlements?	No	The Site is identified on the Local Plan's Policies Map as being within the Felpham to Bognor Regis Gap. New development in the form proposed would not lead to either actual or perceived coalescence between Felpham and Bognor. The character of the site would change but the green infrastructure strategy brings appreciable benefits in terms of landscaping, habitat creation and public access.
Within settlement gap but small or modest site size and location would not significantly compromise the gap or purposes of the gap?		As above.
Avoids, protects and conserves the best and most versatile/productive soils?	Yes	The application site is not classified as agricultural land; on ALC maps it is referred to as 'non-agricultural land'.
Protects the special setting of Arundel and is not within the policy named locations?	Yes	The application site is not within the area delineated on the Policies Map relating to the setting or Arundel.
Protects and conserves Conservation Area.	Yes	No designated heritage assets are considered sensitive to change by the proposed development due to a combination of topography, the distance from the site and the built-up nature within they are located.
Protects and conserves Area of Character.	Yes	The application site is not in close proximity to an Area of Character designated on the Policies Map.
Protects and conserves Scheduled Ancient Monument.	Yes	There are no such designations in close proximity to the application site.
Protects and conserves sites of National Importance for Nature Conservation?	Yes	The application site is not in close proximity to any Site of national importance for nature conservation. The intervening distance between such designated sites and the Site will result in a negligible effect.
Protects and conserves sites of Nature conservation Importance?	Yes	The application site is not in close proximity to any other Site of importance for nature conservation. The intervening distance between such designated sites and the Site will result in a negligible effect.
Protects and conserves Local Nature Reserve?	Yes	The large expanse of on-site GI will provide new residents with areas for recreation ensuring that impacts to the Brooks LNR will be also be negligible.
Sympathetic to Biodiversity Opportunity Area?	Yes	The proposed development's green infrastructure has been designed to support the biodiversity opportunity area.
Biodiversity	Yes	The biodiversity net gain calculations for Site A have resulted in a habitat gain of 10.29%, which is a result of the GI that is being retained and enhanced to the west along Lidsey Rife and the newly created woodland and grassland habitats proposed. The



		hedgerow and river scores were also positive with 17.43% and 46.95% respectively.
Addresses requirements of Pagham Harbour Buffer Zone A (400m) ?	Not Applicable	The application site is not within either Buffer Zone A or B.
Addresses requirements of Pagham Harbour buffer Zone B (5 km)?	Not Applicable	The application site is not within either Buffer Zone A or B.
Avoids Sharp Sand Minerals Safeguarding Area (MSA)?	Yes	The site is not within a Minerals Safeguarding Area.
Within MSA but less than 10 dwellings and size 0.5 ha or more.	Not Applicable	The site is not within a Minerals Safeguarding Area.
Protects Existing and Contributes new Open Space	Yes	The proposed development will not result in a loss of outdoor sport facilities; rather the new golf course and facilities would represent an improved offer both in terms of the standard of the course and better facilities. The new location, some 4km further east has been confirmed by the Golf Club as being suitable and will support its vision to establish an outstanding golf and social experience.
Avoids and protects Local Green Space (in Neighbourhood Plans).	Yes	The Felpham Neighbourhood Plan designated the Lidsey Rife as a Local Green Space. This is protected by the proposed development.
Flood risk requirements are addressed.	Yes	There is an associated area of flood zones 2 and 3 shown on the extract from the Environment Agency (EA) Flood Map for Planning in the accompanying Flood Risk Assessment (FRA) (Figure 5-3). This mapping is based on strategic scale modelling; whereas site-specific hydraulic modelling undertaken by WSP in accordance with a scope agreed with the EA demonstrates that the development platforms are not at risk of flooding during the 1 in 100 year plus climate change event. The FRA also explains that the proposed development will have a safe access and will not increase flood risk elsewhere.
100-year Climate Change Contour Flood Allowance will allow a viable development?	Yes	The Flood Risk Assessment has considered climate change allowance accordingly.
Adapting to climate Change, energy and renewable energy?	Yes	Measures are set out in the Sustainability Strategy.
Addressed water supply, quality and efficiency?	Yes	Measures are set out in the Sustainability Strategy.
Promoted with an evidenced 5-year delivery trajectory and signed Statement of Common Ground	Partially	The HELAA (2020) presents Site A as delivering up to 1045 units with the following timescales for the 5-year delivery trajectory: 2023-24 – 50 units 2024-25 – 150 units 2025-26 – 150 units 2026-27 – 150 units 2027-28 – 117 units A different delivery period now exists because of the passage of time but the majority of the housing would be delivered in a 5-year period after commencement. There has not been a signed Statement of Common Ground complete.
Viable Density and Yield?	Yes	The scheme is to deliver up to 480 units with an average density 40dph.



All relevant evidence and studies are included to ensure that the application can be validated?	Yes	An Environmental Statement has been submitted alongside the planning application.
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