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Subject: OBJECTION TO PLANNING APPLICATION : FP/274/21/OUT

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Dear
Sirs

08/03/2022

OBJECTION To Planning Application FP/274/21/OUT. (Redevelopment of existing Bognor Regis Golf Cub)

I wish to put forward my strong objection to the above planning application on the following grounds.

Need for Housing

Whilst I appreciate the need for housing in the country as a whole, i feel that the Arun district has over the past few years and the plans for the coming years bore the brunt in providing more than is fair share of housing. The strain on current infrastructure and facilities, natural resources, the loss of greenspace and biodiversity has seen unprecedented pressure put upon all services across the whole spectrum. As outlined in your Local Plan 2011 - 2031 and your Authority Monitoring Report 1st April 2022 to 31st March 2021, 20000 houses would need to be built to sustain current demand. From your own statistics and plans completed and approved you are well on your way to acheiving this target by 2031, currently at 1310 houses per year till 2026 then 980 per year till 2031. With Plans for 700 homes in Pagham, 2300 homes in Ford, 1250 homes in Barnham/Eastergate, Angmering north/south 421 homes, Climping 300 homes, Ford lane 100 homes and land south of bersted station 200 homes in the pipeline along with those developments already completed or due for completion, (north bersted 556 properties, 550 homes in Yapton, 90 homes in Arundel, 442 homes in Fontwell, and the BlakesMead development of 820 homes in Felpham and with the potential for up to 4300 new homes could be built between Fontwell down to Lidsey (including Barnham, Eastergate & Westergate) these will or have put extra burden on the local amenities and facilities.

Felpham has its own identity and still retains its village feel, but with the latest large building project just finished, Blakes Mead, with 850 houses, Felpham is now just becoming another ordinary town. We cannot allow more homes to be built in places that are either not required or just to meet government unrealistic targets.

The development on Bognor Regis Golf Club would destroy what is a gateway to nature and the south downs and an integral part of the Felpham make up.

As part of Arun District Council policy INF SP1, local schools, healthcare, transport, Public Services, Utilities & Transport should all be considered within any planning application of this scale. It seems from the application put forward that all the fore mentioned can be ABSORBED into the local amenities and services already provided. This is clearly not the case as these are already under extreme pressure, have you tried getting to see a doctor in Felpham !!!!

As part of Arun Sustainable Development plan " deliver all local plan strategic objectives " details the need for sustainable communities to be considered, including the need to meet the needs of Arun's residents. With no new schools, doctor surgeries or dentists or care homes or public transport links proposed in this application and the need for new local jobs to be created to meet the demands of local people, How does this new development satisfy these requirements as laid down in your own Policy ?

The exact design, layout, location, boundary lines, proximity to existing dwellings are yet to be submitted as part of LRM " reserved Matters", so although difficult to comment, I would say that any buildings would afford us a lack of privacy, security and noise pollution. This can only lead to undue stress and anxiety upon residents in the near vicinity.

Nowhere within Arun District Council Local plan or Monitoring Plan is Bognor Regis Golf Club listed as part of the Council's strategic Housing plan for the period up to 2031.

Under section 12, housing Delivery, of the Arun local plan 2011-2031 policy H SP1 table 12.2 shows that your target of 20,000 homes will be met and in fact surpassed with the completed and current developments in progress without the need for further developments. No doubt small developments and windfall developments will add to this figure over the next 9 years. So why the need for this development in an area not suited.

This application is proposed for 480 class C3 new homes, at the end of 2017 it was concluded in the latest draft version of Arun District Council's Land use that the prospect of residential development at the Golf Club would be excluded. It was unanimously agreed by Arun's local plan sub-committee to exclude the course from the plans. The planning inspector Mr Mark Dakeyne asked if this was too strict and Arun planning policy team leader, Julia Dawe stated " the criterion states that Class C3 residential use will not be considered appropriate " while the council considers a mix of uses is acceptable in employment locations, including C1 halls of residence for workers and students, it does not support the use of C3 residential". " it is therefore considered the criterion is required". Mr Dakeyne also went on to say " the site has been assessed as part of the sustainability appraisal and this has concluded that due to various constraints, the site is not suitable for allocation within the local plan". So I ask the question " What has changed since this time to consider this application when it was clearly not considered for inclusion in 2017.

Local Infrastructure

The applicant has stated that such developments demands on the local infrastructure are out of their control and although will continue discussion are basically saying it is up to the council/government/private sector to provide such infrastructure, this maybe the case but the development is the cause of such strain and is not meant to add to the already stretched services

Education

There are five primary schools within 2 km of the development. These primary schools combined have a capacity of 2390 pupils and currently have 2209 attending pupils leaving a capacity vacancy of just 181 pupils. As stated by the ONS March 2021 the average family has 1.7 children per family. With 480 new homes and if 2/3rds had the average, that would equate to potentially 544 more children that would need to be accommodated into these schools. Schools and teachers are already under pressure and with ever growing population this will only increase.

Felpham community college currently has 1409 pupils with capacity for 1430, with a spare capacity of just 19. How can the applicant so blatantly say any increase will be absorbed.

As part of the government climate change policy, trying to encourage people to use public transport, cycle or walk and use our cars less, then pupils will need to travel further afield to attend schools. As quoted in the Felpham Parish Council neighbourhood development plan, FPCNDP, Blakes Mead development has already put a significant strain on schools. With no additional primary schools being built in the near future, pupils choice for school will only increase and increase stress on them to attend schools local to their homes. With no school planned in the application, how will schools cope in the future ? A new school was part of the original Blakes Mead plan but was never fulfilled, why ? when there is obviously a growing need for it.

Healthcare

With the potential for over 1,500 new residents on the proposed development, this can only increase the strain on the only real local doctors surgery, Flansham Park Health Centre. Blakes Mead already put the surgery under pressure and another large influx can only be bad for its already anxious patients. The average GP according to latest

government figures has 2038 patients, this means on average Flansham Park surgery already has in excess of 20,000 patients. With around 1/3rd of residents in Felpham 65 or over and with 5% of those with serious or bad health conditions, and of course an ever aging population, this can only increase pressure on Flansham Park surgery, health care and support and private care facilities and services. With no plans for a new medical centre in the area, this will only cause more stress and anxiety to patients trying to see their GP.

There are 4 dental practices around Felpham, all are private practices and after calling each, NON are taking NHS patients at this time and have no plans in the immediate future. This again raises the issue of supply. Dentist practices are at near capacity and have long waiting times for appointments.

As the health secretary, Mr S Javid, is always saying, there is a major shortage of qualified Doctors and Dentists. These professions are losing staff at an alarming rate and any increase in the local population of this size will only lead to more waiting times and more strain on the services.

As part of the system, there is only sufficient burial space in Felpham for the next three years, as outlined in the FPCNDP Jan 2021. Again this development can only increase pressure to source a suitable location local to Felpham.

St Richards Hospital in Chichester covers a very wide area for its services, especially A & E, with all the new housing developments completed or in progress, pressure on this hospital will only increase further. With a aging and increasing population in the Arun district, this development will only add to this. We frequently now have to travel to Worthing or Portsmouth for treatment as St Richards cannot provide the service when required.

Traffic/Transport

this development will have a major impact on Golf Links Road, Wroxham Way, Stalham Way, Downview Road and surrounding roads. Downview road will be the main point of access to the site. this road was not constructed for this amount of vehicle, potential up to or exceeding 1,000, daily. this is the main route for Downview school and between 8.30 to 9.00am and 2.15 to 3.15pm each school day, Wroxham Way, Golf Links Road, Stalham Way and Downview Road become virtually impassable. Cars are parked on both sides of the roads, access is virtually one way only as two cars cannot pass. Emergency service or heavy goods vehicles cannot access these roads at these times due to the congestion already caused. an additional 1,000 vehicles would be absolute carnage on these roads. with the safety of pedestrians and cyclist high on the priority list, for this reason alone must be considered grounds for rejection.

Public transport or refuse collections do not run services at these times because they know access is in high on impossible. Blakes Mead access onto the A259 Felpham relief road does not have this issue and therefore does not affect the local traffic the way this development most certainly will. As stated in the FPCNDP issues have already been raised on the Blakes Mead site where parked cars have hindered/obstructed the movement of emergency vehicles. This already happens in the afore mentioned roads without the additional traffic proposed by this new site. As Downview road/Golf Links Road are the only access to the site, does this mean that construction vehicles using the site will also avoid traveling these roads during the school run, i do not think so. HGV trying to gain access or leave the site during this time would not only be extremely difficult but dangerous to school children on foot or cycling to school but would also leave a trail of mud and debris from the construction site during wet weather which will lead to increased risk to public road safety. With the many junctions along Downview Road this can only lead to disaster. ONE fatality, god forbid, is one too many.

The proposed new junction with Golf Links Road and Downview Road will only send more vehicles down Stalham way and Wroxham way to avoid this junction, so thereby increasing traffic on these roads, which are also used for the school run and increasing road safety on these roads. This proposed route of access is surely not appropriate for this number of dwellings/vehicles.

Public Safety must be Arun District Council number one priority and this new development would clearly put that safety at risk.

Waste/Clean Water.

Sewage waste, where do we start, southern water are the countries worst water company for illegal discharges and the huge number of discharges over the past couple of years. this new development will only add to the growing problems they face and the enormous strain they are under to treat more sewage waste rather than discharge into local rivers, streams and rivers and the sea along our little bit of coastline. The applicant says that there is capacity at the Lidsey WWTW and Ford WWTW, if this is so then why so many discharges. also this does not take into account the huge number of new homes being developed or proposed over the ADC local plan period to 2031. surely ADC have as part of the Environment act must take this into account.

surface water run offs will only increase with more developments and access roads on this site. The current system is already under strain due to lack of resources to clear drains and maintain pipework. as part of ADC local plan section 18, Water, Policy W SP1 states that mitigation measures for new developments including sustainable drainage systems to prevent risk of flooding and support habitats and ecosystems without putting additional pressure on existing systems. This new site can only increase those risks not diminish them.

Tangmere WWTW discharges into the aldingbourne Rife and as per section 18.2.5 is currently failing water framework directives. 18.2.6 says the from the Lidsey WWTW catchment area, have experienced foul water flooding of roads and property which has led to pollution of watercourses, this is due to the system being overloaded, surely this new development will also increase the risk of the system being overloaded.

Clean drinking water is a non replaceable resource, we only have what we have. we are already experiencing water shortages due to climate change, with the development of this new site that will only increase demand in the area. With water companies under pressure to provide more clean water, this development will add to that demand. Chichester Harbour is an Area Of and Beauty along with the Felpham coastline and Pagham Harbour which is listed as special area of conservation must be protected from additional pressures created by new developments. Felpham along with Pagham Harbour, Bognor Reef and Climping Beach are listed as Nationally Designated Sites and therefore are protected by law. this development will only increase the burden on Felpham as a listed area. The applicant has stated there will be no increase in the quantity of water discharged from the site, Lidsey Green ES VOL 1 Non Technical Summary, and no adverse change in the discharge to the water environment, with up to 480 new homes the increase of water usage and discharge will of course increase, it has to, along with additional run off to the environment. Some housing projects have already been put on hold in the West Sussex county due to water issues, either concerns of lack of supply or waste discharges. please do not let this development add to those concerns.

Flooding

Bognor Regis Golf Club is regularly closed due to water logged course or flooding. Since 24th December 2021 up to the 08/03/2022 the course has been closed for a total of 29 days. This only goes to show this land is not suitable for development. although the course is only in a minor flood risk area, this till constitutes a potential risk. this new site would only increase the risk of flooding. It has been identified that blocked or low maintained ditches and watercourses are a source of flooding. Bognor Golf Course has a criss/cross network of open ditches and the Rife runs alongside the course, as the proposed plan is to retain these , i ask who will be responsible for the maintainence of these water ways.

Flooding is on the increase in areas that have never or extremely rarely flooded in the past, as this site is well known for water retention and with predicted increase of rainfall in the coming years, this can only increase the risk to flooding in this area,

Bio-diveristy/ Environment

Loss of substantial habitat.

Bognor Golf course has been on this site for nearly 100 hundred years and the fauna and flora has become well established over this time. rear mammals, bats, birds, and plant species call this site home, either permanent or seasonal. the loss of established trees which will removed to make way for this development will have an impact on these species. simply replanting will not account for these loses as such replanting will take many years to build up the host of species they support. some of these areas have built their own bio diverse habitats and when removed the habitat is lost.

Many bird species identified as being resident or seasonal on the course, Meadow pipits, Cuckoo, Wrens , song thrush, tawny owl, and many others are on the "Red List" of endangered species and therefore must be protected as stated in law. this new development will have a major impact on these species and many other species as not only during the construction programme but also the properties themselves will cause these to move elsewhere and not return. We cannot allow this to happen, We have moral right to respect the habitat and abundant species they support to protect these areas, the golf course provides shelter and substance for these resident and seasonal species.

The Rife and water ditches that cross the course are also home to a great variety of fauna and flora and need to be protected.

The loss of these habitats should not be allowed for the sake of unnecessary housing.

Any new developments must show a net gain in bio-diversity. This new development will destroy existing diversity and would take many years for this diversity to re-establish , if it returns at all.

Section 21 ,Quality of the environment, says any development must have positive contribution to the quality of the environment, this new development will not have a positive effect on any environmental aspects. Loss of habitat, water concerns, traffic concerns, local services etc.

Noise pollution.

it is recognised that noise pollution can impact upon quality of life and give rise to adverse health effects, the construction and permanent residential dwellings will greatly increase the noise levels currently registered on the site, For those close to the development, Golf Links Road, DownView Road, Shirley ave and some on Blakes Mead, this increase in noise pollution can only have a negative effect on those residents health. Tranquillity is a key characteristic of the natural environment (section 21.2.2) The noise levels indicated in the applicants baseline noise report, states that stations LT1,LT2 <3 all recorded levels of around 50db day and 44db at night. Most of this was down to wind noise from trees and background low level noise. this will certainly increase if the application is allowed to commence.

Employment in the area is mainly wholesale or retail with some hospitality. A lot of the work is seasonal and most residents travel more than 1.5miles to work, This new development , as did the Blakes Mead development and subsequent increase in population this development will bring will and already has resulted in greater pressures on all aspects of employment, transport, leisure and wellbeing.

Construction of new site (BRGC)

Construction Dust

Dust will inevitably be created during the construction period, being so close to the site will have an adverse effect on most residents in Golf Links Road and Blakes Mead with some effect further afield. Dust has always been identified as a major source of ill health and the potential to exacerbate existing health condition, asthma , COPD, lung or breathing difficulties. The construction of this development would have a significant impact on those residents with these conditions. The aging population close to this development would suffer from dust created and during dryer periods would have a major impact. not being able to sit outside or have windows open. Consideration must be given to any dust contamination arising from this construction works.

As detailed in the applicants view PRow FEL/153/6 Viewing from the south Golf Links Road, during construction where the activity would be most prominent has indicated the following, sensitivity to change :HIGH, Magnitude of change :HIGH; effects of change :Major Adverse. These levels are also indicated throughout the plan period of 15 years. Therefore concluding those properties located in this area, mainly properties no 8 to no 28 would have the most impact, as we live in Golf Links road this development would have a HIGH/MAJOR impact for our lifetime.

Most of the other issues arising from the construction have been covered in previous points.

It seems this proposal and the development of the new golf course is to satisfy those few hundred members over the general view of the local population.

I trust the points I have outlined will help you make the right decision for Felpham and its residents and refused this application.

Lets keep Felpham village with all its character and charm a place we are all proud of.

Kind Regards
Mr S. Lockless
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