

Arun District Council
Development Control
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2022/124003/01-L01
Your ref: FP/274/21/OUT

Date: 25 March 2022

Dear Planning Team,

OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED, EXCEPT MEANS OF ACCESS, FOR THE ERECTION OF UP TO 480 NEW HOMES (C3), THE FORMATION OF A NEW MEANS OF ACCESS ONTO GOLF LINKS ROAD, TOGETHER WITH THE CREATION OF NEW SURFACE WATER DRAINAGE, NEW LANDSCAPING AND HABITAT CREATION, GROUND WORKS AND OTHER INFRASTRUCTURE AND THE RETENTION AND RE-PURPOSING OF THE RETAINED CLUB HOUSE (F2). THIS SITE ALSO LIES WITHIN THE PARISH OF YAPTON, AFFECTS A PUBLIC RIGHT OF WAY AND IS A DEPARTURE FROM THE DEVELOPMENT PLAN. THIS APPLICATION IS SUBJECT TO AN ENVIRONMENTAL STATEMENT.

BOGNOR REGIS GOLF CLUB, DOWNVIEW ROAD, FELPHAM, PO22 8JD.

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

In accordance with National Planning Policy, we **object** to the proposed development for the following **two** reasons:

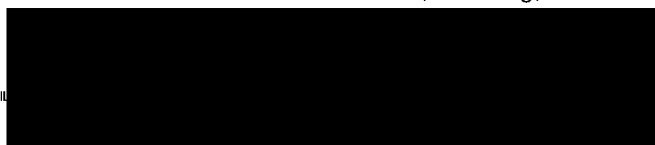
Objection 1

In the absence of an acceptable flood risk assessment (FRA), we object to this application. The submitted flood risk assessment (FRA) is supported by modelling and outputs that we have not yet reviewed and approved. Until this modelling has been reviewed, we will maintain our objection to this application.

Reason 1

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. The following information is missing:

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.



- The flood model and outputs used to support the FRA have not been submitted for EA review. The model and its outputs have to be reviewed and accepted by the EA prior to the removal of our objection.
- Drawings and ground levels for the post-development site.

Overcoming objection 1

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Objection 2

We object to the application as submitted due to insufficient information provided to assess the likely effects on water voles and their habitat. There is insufficient information to assess

- the risks posed by this development
- and the details of mitigation or compensation measures

Reason 2

Water vole populations are known to be present in this area. Water vole presence should not be dismissed in any of the suitable watercourses on site, despite previous survey results showing a recent decline in numbers. Water voles are well known for fluctuations in population numbers and may expand into the site from a core population on the adjoining Lidsey Rife.

There are outstanding surveys to be completed in 2022, not included in the application documents, which has made the application difficult to assess. With this in mind the development should presume presence of protected species on the development site.

This objection is supported by paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

Overcoming objection 2

To overcome this objection the applicant will need to submit further information on the up-to-date surveys and any proposed compensatory habitat for displaced water vole to move in to.

Advice to Applicant

Any proposed compensatory habitat for displaced water vole to move into must be in place, and sufficiently mature to support them, prior to displacement or other licenceable activity being carried out.

Both a CEMP and LEMP are proposed by the applicant, and should be provided to, and

agreed by, the Local Authority. Habitats within the proposed Green Infrastructure Areas must be specifically managed as detailed within an LEMP.

Compensatory habitat must be provided for any loss of watercourse or wetland on site. Managed Flood attenuation features are not suitable for providing this habitat. Proposed reedbeds within Suds basins whilst useful for improving water quality and providing some habitat will require ongoing maintenance/management to remain functional.

The Environment Agency has a presumption against culverting of watercourses and any proposed crossing of retained ditches should be by way of clear span bridges.

Development that encroaches on watercourses can have a potentially severe impact on their ecological value.

We support the retention of the six "important" hedgerows on site and would like to see opportunities taken to gap any and all retained hedges, to provide wildlife corridors across the site.

Reference has been made to "lining" ditches where possible. We would not wish to see the artificial lining of any watercourses on site and care should also be taken with any additional proposed planting of aquatic macrophytes to ensure their local provenance.

Invasive Non-Native Species, Parrots Feather and Japanese Knotweed are both known to be present and eradication and suitable disposal of these species as part of a management plan should be agreed prior to any works on site.

Yours faithfully,

Mrs Sophie Brown
Sustainable Places Planning Advisor

