

Unfortunately I don't feel I can support this application on the following grounds (additional to those already raised by other concerned members of the public and civil bodies):

Flooding

From the Arun District Council Level 1 and Level 2 Strategic Flood Risk Assessment:

15.2.2 Key site issues

Bognor Enterprise Zone is shown to be highly susceptible to fluvial flooding with 58% of the site located with Flood Zone 3a and a further 6% located in Flood Zone 2. The majority of flooding is located at the eastern parcel of land, located to the east of the railway, which almost entirely located in Flood Zone 3a. Whilst the site is intended for employment land ('less vulnerable' development category) and therefore considered suitable for development in Flood Zone 3a, consideration is needed on how the site should be developed so that the flood risk is not increased further downstream. It is unlikely that the necessary floodplain compensation could be provided for any development in Flood Zone 3a, making only a small proportion of the site eastern parcel of land available for development. Safe access and egress is likely to be difficult in this part of the site. The high proportion of the site which is located within the Flood Zones also poses constraints on the implementation of SuDS given that these should be located outside of the 100-year plus climate change flood extent. The site west of the railway line has relatively low proportion at fluvial flood risk predicted in the present day. However, under climate change scenarios notably greater proportions of the site are predicted as flooded.

15.2.3 Green Infrastructure

The Arun District Green Infrastructure Study was published in 2012 and aims to encourage the maintenance and/or provision of Green Infrastructure in Arun District, assessing deficiencies and identifying needs and opportunities for Green Infrastructure now and in the future. The study identifies important locations based on assets (e.g. features or clusters of features of value) or strategic gaps (e.g. gaps that play an important in protecting the character of the District and preventing the merging of its conurbations). The study notes that key areas that should be covered by policy and the Local Plan include but are not limited to the:

- establishment of Green Infrastructure Zones
- protection and enhancement of Strategic Green Infrastructure Corridors
- identification and grouping of Green Infrastructure features to protect the benefits provided
- promotion of new Green Infrastructure projects in Arun
- Finally, the West Sussex LFRMS discusses the provision of Green Infrastructure, designed to convey water and are located adjacent to watercourse or flow routes to allow additional capacity to accommodate climate change, and ensure access to any watercourse, structures and defences is maintained for future maintenance purposes

15.2.5 Strategic flood risk solutions

Floodplain restoration represents the most sustainable form of strategic flood risk solution, by allowing watercourses to return to a more naturalised state. This may involve measures such as

- return existing and future brownfield sites that are adjacent to watercourses back to floodplain, rather than allowing new development;
- providing greater connectivity of the channel and floodplain (e.g. by removing raised banks);

Add to this the additional information from the Arun Strategic Surface Water Management Study:

- Enterprise Bognor Regis phase II will be 40% impermeable and the land would need to be raised in order to reduce the risk of flooding.
- ADC to confirm the Bognor golf course development proposals. Potential SuDS opportunities.

All of this is before the BEW development is considered and its impacts on the river system as well as the handling of foul water at Lidesy Wastewater Treatment Works
(https://www.westsussex.gov.uk/media/4734/lidsey_swmp.pdf)

Alas there is no information in the application of how it will interact with either EBR phase II or BEW when it comes to either flood compensation schemes or SUDS.

The impact of climate change also needs to be considered with Climate Central already predicting a large increase in annual flooding to the Felpham area by 2050. The impact of the application on Policy ECC SP1 therefore needs to be considered.

Drainage

Not really able to comment as most of the documentation for the proposed drainage system has not been supplied/uploaded with the application. As noted above this not only needs to consider the site for the application itself but also its interaction with the plans for the strategic EBR phase II and the existing Site 6 western boundary. For example the supplied master plan for the golf course site omits the drainage ditches behind Wellers Close, Daisy Gardens and Bridger Close that provide 'soakaway' SUDS for the houses in those areas. With the proposal to remove the trees/hedgerows and replace them with roads it appears that this existing drainage would be removed resulting in an increase in risk to flooding to already existing housing. This is not helped by the same plan not showing the current state of site 6 development and implies more green space/connected drainage ditches on the site than actually exist (for example half of Daisy Gardens, all of Wellers Close and some of Redbarn Crescent are missing)

Green corridor

It should be noted that Policy SD SP3 already conflicts with policy EMP SP3 when it comes to the gap between Bognor Regis and Felpham and the resulting reduction in the green corridor by EBR phase II. This application seeks to further reduce the green corridor to a thin strip of land adjacent to the Lidsey river. It should also be noted that whilst the application seeks to retain the PROW across the site it makes no such provisions for the other tracks and paths used/enjoyed by the public. Stanover lane (a track across the site) would cease to exist for example. Given the number of years these have been used it's entirely possible these could be granted further PROW status if pursued.

Public consultation

This was limited to an online website and response form whose contents are not available to view publicly. The result is that the statement of community involvement only documents some of the gathered feedback and potentially some of the more contentious points aren't present. In addition by using a website it has not been possible to fully engage all the affected local community. Hence the number of responses to the planning application. I believe Felpham Parish Council held a public viewing of a subset of the application documents but there wasn't anyone present from either the golf course or HLM to answer queries.

Visual appraisal

It should be noted that the supplied visual impacts do not include any the site 6 western boundary most affected by this application (Stanhorn Grove, Daisy Gardens, Bridger close or Wellers Close). The master plan indicates 2.5 story houses immediately adjacent to this western boundary, in contravention of policy D DM1 point 3. In addition the golf course site currently enjoys TPO's over it's entire eastern boundary. The application seeks, by approval, to override all these TPO's. This is in contravention of policy D DM1 point 7. It should also be noted that site 6 suffered a loss of protected trees during construction that has has an adverse impact on it's character which can not be immediately replaced by new plantings.

Separately it should also be noted that the recommended DPH for new developments is in the 30 to 50 range. Much of this application is at the top end of this range with selected areas almost twice the maximum recommended limit. Whilst there doesn't appear to be a specific ADC local plan policy that covers this, it should still be considered as out of keeping with the surrounding area. If not contrary to policy D DM1 point 6.

Generally

At the time of writing (02/04/22), as highlighted above, this application is incomplete. In addition some of the documents supplied appear to be inaccurate and/or misleading. According to the ADC planning portal comments are invited by 09/04/22 with a decision by 03/06/22. With further documents still being supplied by HLM and being uploaded, I'm concerned that there is now insufficient time for public/civil bodies to provide the necessary scrutiny and feedback before the comment closure date. This is particularly concerning when some of the missing documents are for the most sensitive areas of the application.