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11th April 2022

Adam Bell
Flat 2 Phoenix Court
PO21 2QA
PO21 2QA

Case Officer: Mr D Easton
Telephone: 01903 737500 ex37361
Email: david.easton@arun.gov.uk

Dear Sir/Madam,

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management Procedure) (England) Order 2015 - Article 5

Application No: FP/274/21/OUT
Site Address: Bognor Regis Golf Club Downview Road Felpham PO22 8JD
Description of works: 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.

Thank you for your internet representation made on 8th April 2022 which has been recorded as an objection with the comments as follows:

OWPC46487

This is an objection on behalf of Sustrans and the Bognor Regis Cycling Forum.

The proposal does not form part of the current Local Plan.

The golf course land regularly floods, and is designated by the Environment Agency as being in Flood Zone 3 (most likely to flood), therefore it would not seem sensible to be building houses on such land. The Flood Risk Assessment document prepared seems to be deliberately downgrading the risk of flooding as it glosses over data such as the fact that groundwater is only 1m below the surface so that the Assessment implies a low risk of flooding overall. The residents advise that parts of the golf club land floods every year. Bearing in mind that currently it's mainly grass, if 400+ houses were to be built drastically reducing the open areas, plus run-off from the paved areas, then it would seem clear the risk of flooding would increase from the present, not reduce. Elsewhere, incorrect statements about flooding are repeated, for example in the Statement of Community Involvement December 2021 which states on page 9 that "all residential development is located outside of areas at risk of flooding". Repeating misinformation doesn't make it true.

Turning to the Residential Travel Plan which is the usual templated document, this highlights the fact that 79% of journeys to work are done by car, but that Government & local council objectives are to increase local journeys done on foot and by bike. The Plan states the intention to reduce vehicle trips by 15% over 5 years,

but the measures set out in Section 7 do not provide any concrete way of achieving this. The consultants are fully aware that consistently in survey after survey, when people are asked why they don't cycle instead of going by car, about 2/3 say it's because the roads are too dangerous. There are no proposals to improve local cycling provision, and the proposals don't seem to amount to much more than providing information about where to cycle and not much else. There is nothing in the planning documents which make any attempt to provide any meaningful way of embedding active travel as the default mode of transport, and instead will simply ensure the new residents drive both to work and around the local area.

The transport statement uploaded does not seem complete as it only includes Appx 1-3 and therefore doesn't show the data which should be in App. 12 for traffic volumes in 2031. However, the WSCC Highways Response does refer to the massively increased traffic volumes.

Currently Downview Road is used by a large number of cyclists transiting between the shared use path along the A259 and the shared use path on the south side of the B2259. There are no plans to protect those cyclists.

One of the mitigation actions to deal with the increased traffic along Downview Road is to stagger the pedestrian crossings at the junction of Downview Road and the B2259, to reduce delays and queues. In other words, pedestrians will be forced to wait long to get across. Yet again, this reinforces car culture and will make it less attractive to walk.

If the developers genuinely believed the various statements they have made throughout the various planning documents about sustainability and protecting the environment, then the plans would be radically different.

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at :<https://www.arun.gov.uk/what-happens-next>.

Some applications will be determined by the Planning Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/planning-application-search>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Planning Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website
<https://www.arun.gov.uk/privacy-policy/>

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.

To register to receive notification of planning applications in your area, please go to
<https://www1.arun.gov.uk/planning-application-finder>