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Felpham
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6th April 2022

Dear Mr Easton,

Re: Application FP/274/21/OUT
Housing development on Bognor Golf course land

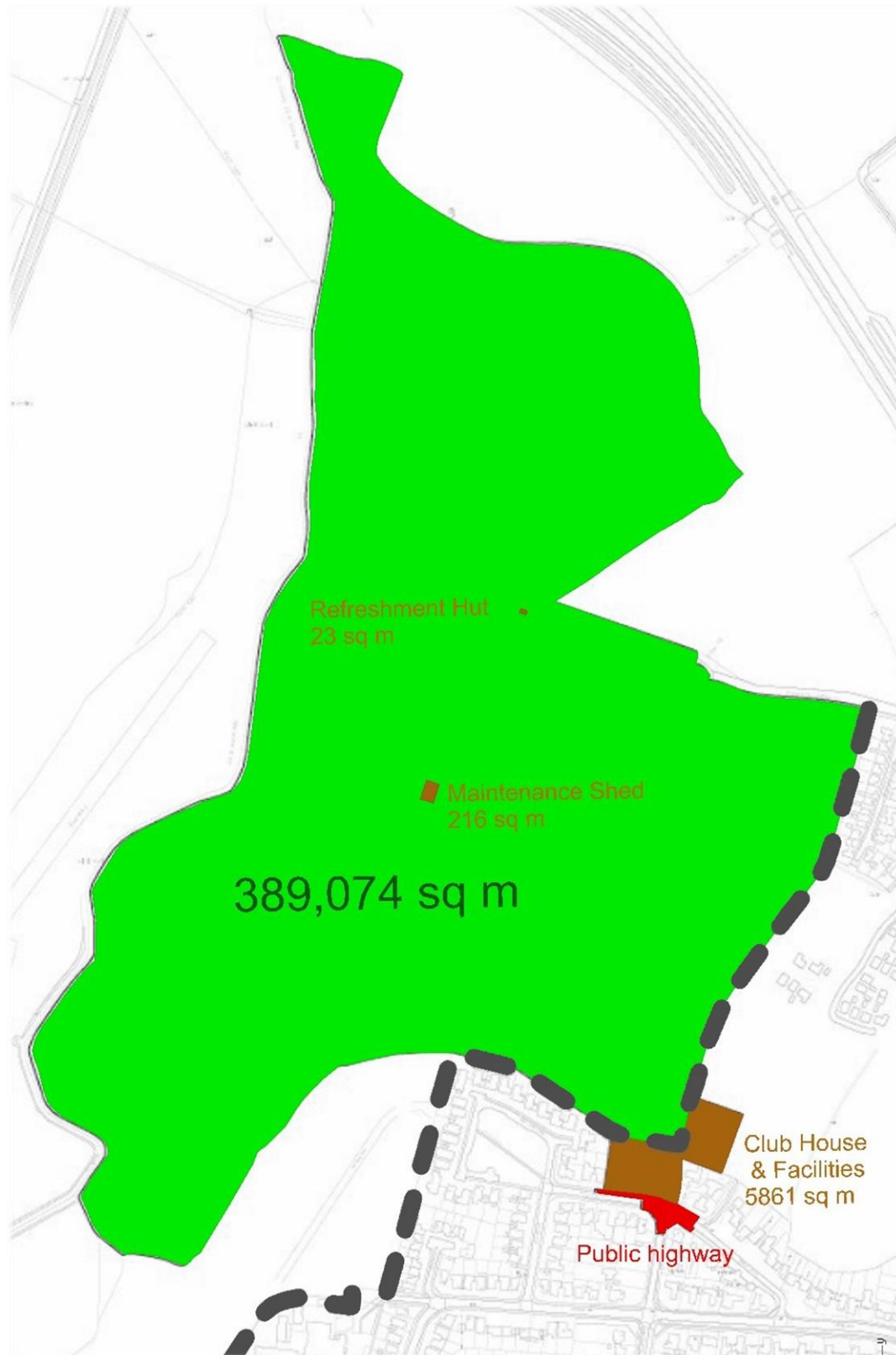
My wife and I are strongly opposed to this application for a number of reasons.

But, even before these, we are astonished it has progressed as far as it has, by way of its inclusion on the Arun, *Brownfield land and self build Register*. The NPPF defines 'brownfield land' as 'Previously developed land', which is in turn defined as:

***"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure."** "This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds"*

In our Figure on page 2 the approximate footprint areas of all permanent structures on site A are shown in brown. And if we exclude the public highway, shown in red, we get the tiny combined area of 6100 sq ms. It would seem this alone is what has been used to claim the site is brownfield, giving it a place on Arun's HELLA, *Brown Field and Self Build Register*.

This strikes us as utterly preposterous; to characterise 39.5 Hectares as 'brownfield', purely on the grounds that only 6100 square metres of it are built on. This is a mere 1.56% of the site, for goodness sake!



We were, however, even more astonished when we discovered the Club House and its facilities lie within the built up area, as shown above by the usual pecked-line built-up-boundary of black sausages. By our reading of the definition, this excludes these buildings and facilities from the equation, because they form an integral part of a

recreational facility, just as a cricket pavilion would be seen as part of a whole. Such exclusion appears in the NPPF 'Previously Developed Land' definition:

*"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure." **"This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds"***

For those wishing to see this differently, it is a useful exercise to consider what it would mean if the built-up-boundary happened to cut across the green corner; would the green portion so created be eligible for the HELLA list? The NPPF definition says it shouldn't be and this would be irrespective of any other properties of the site remaining outside of the built up area – the boundary does mean something.

If we therefore exclude the Club House's 5861 sq ms, the proportion of the remaining 38.9 hectares built on goes down to 0.06%!

But even this may not be the full enormity of it, because (as acknowledged under 4.81, page 20, of Hallam's *Lidsey Green Sequential and Exception Test*) the Ministry of Agriculture, Fisheries and Food classify golf course land as 'Non-agricultural', meaning:

"Soft' uses where most of the land could be returned relatively easily to agriculture, including: golf courses, private parkland, public open spaces, sports fields, allotments and soft-surfaced areas on airports/ airfields. Also active mineral workings and refuse tips where restoration conditions to 'soft' after-uses may apply."

Given that the golf course maintenance building is of an agricultural nature and easily repurposed for agricultural use -- even that its current use is in many ways indistinguishable from this already – any argument that it should be rolled out to bolster the claimed 'brownfield' status is playing with semantics. We all know the reality of it.

We feel it is therefore fair to follow the exclusion from 'brownfield' categorization offered by the NPPF's definition:

*"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure." **"This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds"***

We are then left with just the refreshment hut's 23 sq ms, taking up only 0.006% of the site!

Following all reasonableness and common sense, we find the site's presence on the HELLA Registry totally inexplicable and something that demands a full explanation for those Club members who are happy for their Club to remain where it is, as well as for local resident who stand to lose so much, in order for those who would leave to satisfy their desires.

Our other objections can be headed in the following ways:

- **Would decimate the green gap, heralding its final destruction**
- **Gross overdevelopment**
- **Emergency, Hospital, GP, social and amenity facilities overload**
- **Does not feature in the Local Development Plan**
- **Sewage overload, leading to yet more illegal releases**
- **Traffic overload, both within immediate roads and further a field**
- **Lack of nearby employment will necessitate increased commuting travel**
- **Unacceptable damage to the character of Felpham**
- **Contrary to what is implied, we understand Golf Club members do not fully support it**
- **Club members who do support it do so with complete disregard for the damage it would inflict on local resident's lives, while seeking to further their own enjoyment elsewhere**
- **Information accompanying this Application appears inaccurately/dishonestly presented**

Yours Sincerely

Jean and Bernard Shattock