

Arun District Council, Civic Centre, Maltrovers Rd, Littlehampton, West Sussex, BN17 5LF

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Sent: 08 April 2022 22:44

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Subject: Objection to planning application FP/274/21/OUT - Bognor Regis Golf Club

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Dear Arun Planning,

Ref: Application FP/274/21/OUT - up to 480 new homes, Bognor Regis Golf Club

I'm writing to ask if you would please record my objection to this planning application.

My main reason for objecting is that Arun District Council made a Local Plan, adopted in July 2018, approved by the Secretary of State / Planning Inspectorate, which set aside the area that is the subject of this application to be preserved as a green "gap between settlements" - largely the last remaining, between Felpham and Bognor.

It seems odd to have to object to this application on the basis that Arun should stick to the specifications of its agreed Local Plan, but that is the situation.

Section 7.4 "Settlement Structure and Gaps Between Settlements" of the Arun Local Plan makes a strong case for the importance of preserving these 'green gaps'. It states:

"7.4.2 - It is important to retain the settlement structure of Arun District and recognise the value of gaps between settlements for preventing the coalescence of individual settlements and for retaining the separate identity and amenity of settlements. Furthermore, the gaps, which are largely undeveloped, and fall outside the Built-up Area Boundary, are also crucial for protecting the areas of undeveloped coastline and for contributing to the District's multifunctional Green Infrastructure Network."

"7.4.3 - The principle of a gap policy is well established within West Sussex Development Plans and were included within the most recent West Sussex Structure Plan (2001-2016) and the Arun Local Plan 2003. The policies within the Structure Plan and Arun Local Plan sought to safeguard those gaps between settlements which contribute to the distinctive character and settlement structure of the District ..."

This section concludes clearly under the heading "Policy SD SP3 - Gaps Between Settlements", that:

"Development will only be permitted within the gaps if ... It would not undermine the physical and/or visual separation of settlements" - and - "It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development"

- along with -

"It cannot be located elsewhere" - and - "It maintains the character of the undeveloped coast".

This 'Local Plan Policy Map 3 (West)' clearly shows the entire area covered by this proposed development designated as a 'green gap' - one of the last remaining such areas between Felpham and Bognor:

<https://www.arun.gov.uk/download.cfm?doc=docm93ijm4n12920.pdf&ver=13060>

This application therefore completely contradicts the above provisions of the Local Plan and most requirements of Policy SD SP3, as approved by councillors and the Planning Inspector and it should not be permitted under the specified criteria because:

- It would all but join this developed site with a planned Strategic Employment Site to the west (site 4) as well as other nearby existing sites (there is an existing planning application for a large new warehouse building on Site 3), together erasing the deemed "important" and "crucial" green separation between Felpham and Bognor over a large part of the Local Plan-designated area. Alongside these future developments / allocations, it would completely undermine the physical separation of the two settlements.
- Large buildings likely to be proposed within Strategic Employment Site 4, of the type seen on other neighbouring recently developed sites, will certainly compromise the integrity of the gap and undermine the visual separation of the settlements. Buildings on both sides will be both close to and clearly visible through the remaining narrow green boundary of this proposed development. Aside from a few remaining trees, from many visual perspectives there will be no green gap.
- In addition, there are many other strategic sites within a few miles of this one with the potential and intention to deliver many thousands of new homes; on Ford airfield (1,500 homes), the Barnham/Eastergate/Westergate sites (3,000 homes), sites in Pagham (1,200 homes) and others amounting to thousands more. It is therefore clear that these 480 homes can be located elsewhere, even very nearby.
- Finally, building 480 new homes on a 'green gap' site is clearly contradictory to 'maintaining the character of the undeveloped coast'.

Back in February, in advice issued to Worthing Borough Council, the Planning Inspector encouraged the designation of 'green gaps' in their Local Plan, saying that development in such areas should be 'carefully controlled' and 'permitted only in exceptional circumstances'. There are no exceptional circumstances justifying this application in this 'green gap' and it sounds like the Planning Inspector, if consistent in their view, would support such a decision.

Source: <https://www.sussexexpress.co.uk/news/politics/gaps-between-worthing-and-neighbouring-settlements-will-not-be-built-on-3568800>

Therefore, to now approve a huge new residential development on this site wouldn't be a mere 'departure' from the Local Plan; it would be completely ripping it up.

So manifestly contradicting a formal Plan made just a few years ago, that by law is supposed to guide applications and development, that rightly sets out to preserve one of the last areas of green space separating Bognor and Felpham, purportedly valued by Arun, would surely cause Arun to lose all credibility as a planning authority.

If not even these gaps can be preserved when designated as such in the Local Plan, it would pave the way for a development free-for-all on every piece of green space across the district. What other conclusion could the Planning Inspector possibly draw in future about greenfield development proposals, if councillors decide even their designated 'green gaps' can have 480 new homes on them?

Once gone, this 'green gap' space will never return. It is simply not necessary to do away with such a valued last remaining area that councillors have deemed so important to preserve, when there are various other very large development sites in progress locally.

There are, of course, many other practical problems with this plan. Not least the access road and related junctions to main roads, which are extremely busy and obstructed at school drop-off/collection times. Another 480 homes, many likely with more than one car, using that route would add to existing extreme pressure. WSCC Highways have a terrible record for inaccurately assessing the impact of traffic from new developments. Before considering approval, Arun must take responsibility for a proper assessment.

It is also unclear whether neighbouring Downview Primary School has the capacity to accommodate the significant number of extra children who will likely live in the new development. Has anyone asked the school? The recent Blakes Mead development in that area made site provision for a new school which was never taken up, with the decision made to expand Downview instead. Does it now have the capacity for even more applicants and, if not, what would be the impact on other nearby schools? Do they have any spare capacity? This is essential research into the resilience of basic local infrastructure, before approval can be considered; has it been done?

Thirdly, I believe the nearest GP surgery at Flansham has stated that they would not have the capacity to handle the additional residents. Again, this is a response from a vital part of our local infrastructure, saying they have no capacity. That cannot, in all responsibility, be simply ignored.

But, most simply and importantly, I believe that councillors should uphold the clear provisions of their Local Plan that the Council has made and the Planning Inspector has approved. Namely, that the site of this development should rightly be preserved as specified - a last remaining 'green gap' between Felpham and Bognor.

I therefore urge the Council to reject this application.

Regards,
Stuart Coster

(cc. all ADC Planning Committee members and Felpham Councillors)