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From: Geoffrey Winch [REDACTED]
Sent: 18 July 2022 13:15
To: Planning <Planning@arun.gov.uk>
[REDACTED]

Subject: FP/274/21/OUT - Bognor Regis Golf Club Proposals - Further Comments and Objection

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Following the applicant's reply of 20th May 2022 to the County Highway Authority's formal response dated 31st March 2022, I now wish to reiterate that I OBJECT to the development as set out in my email dated 16th

March 2022 (which was endorsed by Felpham Parish Council in their own formal response) but, in doing so, I also wish to draw attention to particular points which now arise.

At the time of the Site 6 planning application it was quite clear that the developers could have accessed the local highway network directly via two publicly maintainable roads, and potentially a third, plus a further one via a privately maintainable road – but this was not desirable for the reasons set out in my objection, and consequently was not permitted.

Therefore, the developers of Site 6 were obliged to enter into a Section 106 Agreement in which they agreed to deliver the Bognor Regis Relief Road (effectively a Bypass), the finances for which were secured by a bond in the sum of £18m under the terms of Section 272 (Financial Provisions) of the 1980 Highways Act. In doing so, this together with other Section 106 obligations enabled their planning permission. Additionally, my understanding is that the Highway Authority also originally sought from the developers of Site 6 the financing of the North-South Link Road (A259-B2259) (through the Lec Airfield Site), but at the Public Inquiry conceded that this would have financially overburdened the developers to an unreasonable degree and so was not pursued. Therefore, the provision of the North-South Link remains as a Local Plan objective with the expectancy that this be wholly funded by developers along its route.

Whilst the overriding principle relating to development presumes that development should be permitted (i.e. this works in favour of developers), it is counterbalanced by a plan and policy-led system to ensure that any development is controlled (in the wider public's interest). Therefore, where applications are made for similar developments on adjacent sites with similar access implications it is absolutely vital that the same principles of securing the means of access are applied as may be determined by the same prevailing policies. This is particularly important as equability will need to be demonstrated, otherwise the system falls into disrepute, and leaves it open to challenge.

It is essential therefore that the County Highway Authority are seen to be applying the same principles of securing the means of access to the proposed development of the Golf Course as they did to Site 6. Therefore it must be concluded that their formal response dated 31st March 2022 is inappropriate and illogical and, in fact, should have been one recommending REFUSAL on the grounds that, if permitted, the development would give rise to an unnecessary and significant intensification in the use of existing local roads by construction and development traffic such that it would be prejudicial to safety on the publicly maintainable highway and inflict unnecessary further damage to those local highways where these are currently structurally unsound.

As a consequence I can only URGE Arun District Council to re-consult the County Highway Authority on this specific point. Not only will your own Planning Case Officer need to know that the CHA have applied policies consistent with those applied when it considered the Site 6 proposals, but the public at large will also need to be satisfied that the CHA is working in its interests and not in that of the applicants'. If there are differences in the policies being applied then these should be identified and the reasons stated in order that they can be scrutinised. It is also important as the North-South Link Road remains an objective of the Local Plan and part of its proposed route passes through the Application Site itself, and, when constructed, would provide a more satisfactory means of access to and from the A259 (Bognor Regis Relief Road). In addition to which subsequent developers along its route will expect their own applications to be considered on an equitable basis and, if not, would have reason to claim that, comprehensively, they should not be obliged to fund and deliver the whole of the road.

The implications of CHA's response thus far is they are accepting that, if the development is permitted, then access can also be permitted via Downview Road subject to some minor alterations to junction geometries and associated traffic signal phasing. It must be apparent to the CHA, judging from the numbers of objections raised thus far, that they are not taking account of the wider public's interests.

Having now set out the case for the County Council needing to make a more rational response I will comment further regarding the Downview Road/Felpham Way/Felpham Road junction in the context of the Applicant's reply of 20th May 2022:

The applicants have rerun the LINSIG programme and have now stated, basically, that they have demonstrated that with the addition of the development traffic and with the impact of other committed development traffic and natural growth of traffic, that the junction can be made to operate in 2031 almost as well as it currently operates. Such a remarkable improvement relative to their previous predictions suggests that the operation of the whole junction should be independently assessed.

Regardless of this they have still not produced any data relating the numbers of pedestrians crossing in the junction area especially during the school peak hour. They have, however, continued to propose new pedestrian refuges in both Downview Road and Felpham Road. The dimensions these will need to be cannot be ascertained unless they have the base information to work from, and they could have to be considerably longer or wider than those they have shown in order to ensure pedestrian and other users' comfort when corralled.

I must also draw attention again to the fact that by proposing a large pedestrian refuge in Downview Road they create an obstruction to large vehicles turning left from Felpham Way West into Downview Road. The location of the refuge is such that a bus, a rigid HGV, and a 13.4m articulated HGV can only execute the left turn by entering the dedicated right-turn lane on the signal approach. This will result in such vehicles having to cut across the path of traffic moving ahead in the dedicated ahead/left turn lane. This is unacceptable, and would be prejudicial to safety on the public highway – in essence it is an irrational and fundamental design fault.

In addition to this the applicants now acknowledge that a 16.5m articulated HGV will not be able to execute the left turn even from the right-turn lane – and considerable numbers of these, plus draw-bar HGVs (18.5m and not track tested by the applicants), will require access for construction purposes if planning permission is permitted, together with other occasional users in the future. The applicants have failed to state what route they propose such vehicles to take in order to access the site.

This would leave the situation whereby no HGVs or buses would be able to execute the left turn from their dedicated ahead/left turn lane, and only some HGVs together with buses would be able to execute the turn in a dangerous manner from the dedicated right turn lane, and some HGVs would be unable to execute the turn from either lane. The only safe remedy that could overcome this most unsatisfactory and confusing arrangement would be by way of imposing a Traffic Regulation Order banning all HGVs and buses from turning left. Such a TRO would need to be supported by advisory HGV and bus route signing directing such vehicles from the Butlins Roundabout to Downview Road via Felpham Road. TROs are in themselves, when advertised, open to public objection and it is probable that such a proposal would be subjected to considerable and justifiable opposition.

It is also unacceptable that the independent Road Safety Auditors who have a responsibility to identify any aspects of a proposed scheme that may give rise to road safety concerns appear also not have noticed this! or, if they have done so, they have simply turned a blind eye. They state that they visited the site on the morning of Saturday 9th April 2022 between 9.30 and 10.30 and in that whole hour they observed just two pedestrians and one cyclist using the junction – this must have been a uniquely quiet Saturday. It is vital that a Safety Auditor always visits a site at its busiest time as well as at other times because prevailing traffic speeds and movement, and numbers of pedestrian and cyclist movements can be at great variance. I therefore also add a further OBJECTION to the development on the grounds that the Road Safety Audit undertaken for the junction of Downview Road/Felpham Way/Felpham Road is seriously flawed and therefore misleading.

I would also like to add a brief comment in respect of the sudden flurry of communications submitted in recent weeks supporting the relocation of the Golf Course – very few of them categorically state that they

support the redevelopment of the site for housing purposes and, if they really do not appreciate playing golf at this well-established and rather beautiful course then they are perfectly free to go and play elsewhere. That is not a reason why their golf course should be sold for housing.

Geoffrey Winch