

Arun District Council
Development Control
1, Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: HA/2022/124003/02-L01
Your ref: FP/274/21/OUT

Date: 27 July 2022

Dear Planning Team,

AMENDED PLANS - 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.

BOGNOR REGIS GOLF CLUB, DOWNVIEW ROAD, FELPHAM, PO22 8JD.

Thank you for re-consulting the Environment Agency on the above application.

We have reviewed the additional information as submitted and set out our position below.

Environment Agency Position

In accordance with National Planning Policy, we **maintain our objection** to the proposed development for the following **two** reasons:

Objection 1

Until the Flood Risk Assessment (FRA) modelling has been signed off we are unable to remove our previous objection (reference: HA/2022/124003/02 dated 25 March 2022)

Reason 1

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development.

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.



We require the following information to continue our assessment of the proposed application.

- Drawings showing any changes to ground levels post development.
- Baseline and post-development model outputs in GIS format.

Overcoming objection 1

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Objection 2

We object to the application as submitted due to insufficient information provided to assess the likely effects on water voles and their habitat.

Reason 2

We appreciate that the applicant has re-iterated their intention to create additional water vole habitat to that lost by the development however we do not accept that this additional ditch length will compensate for the areas being lost.

Much of the length will be within the heavily built development area and alongside roads, with far more disturbance than currently. With the threat from traffic, pedestrians and domestic pets we are concerned that much will remain uninhabited once the building work is complete.

Features created to reduce flood risk for the development cannot be counted as Biodiversity Gain and suitable areas for water vole need to be created and mature before building commences, ideally located in the undeveloped parts of the site. There are still outstanding survey results from this spring (2022) which we would recommend the applicant to include in the next update.

This objection is supported by paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

Overcoming objection 2

To overcome this objection the applicant will need to submit further information on the up-to-date surveys and any proposed compensatory habitat for displaced water vole to move in to.

Advice to Applicant

Any proposed compensatory habitat for displaced water vole to move into must be in place, and sufficiently mature to support them, prior to displacement or other licenceable activity being carried out.

Both a CEMP and LEMP are proposed by the applicant, and should be provided to, and agreed by, the Local Authority. Habitats within the proposed Green Infrastructure Areas must be specifically managed as detailed within an LEMP.

Compensatory habitat must be provided for any loss of watercourse or wetland on site. Managed Flood attenuation features are not suitable for providing this habitat. Proposed reedbeds within Suds basins whilst useful for improving water quality and providing some habitat will require ongoing maintenance/management to remain functional.

The Environment Agency has a presumption against culverting of watercourses and any proposed crossing of retained ditches should be by way of clear span bridges.

Development that encroaches on watercourses can have a potentially severe impact on their ecological value.

We support the retention of the six "important" hedgerows on site and would like to see opportunities taken to gap any and all retained hedges, to provide wildlife corridors across the site.

Reference has been made to "lining" ditches where possible. We would not wish to see the artificial lining of any watercourses on site and care should also be taken with any additional proposed planting of aquatic macrophytes to ensure their local provenance.

Invasive Non-Native Species, Parrots Feather and Japanese Knotweed are both known to be present and eradication and suitable disposal of these species as part of a management plan should be agreed prior to any works on site.

Yours faithfully,

Mrs Sophie Brown
Sustainable Places Planning Advisor

