

Date: 30/09/2022

Bognor Regis Golf Club Downview Road Felpham PO22 8JD
Planning Reference: FP/274/21/OUT

At this stage we would recommend maintaining a holding objection until the following is provided:

Confirmation from the Environment Agency that the proposed land raising and remodelling of the 100 yr plus c/c is accepted;

The Modelling report (March 2022) appears to be mixing the fluvial modelling climate change requirements with surface water climate change requirements. DEFRA guidance requires peak rainfall intensity to be considered for 100-year lifetime for a residential development and as since this takes the life of the development beyond 2100 should be using the upper end factor of 45% not 25%.

No clear surface water drainage proposals are provided for either site. We appreciate that proposed 3D ground modelling is provided but more information needs to be provided on where the proposed development impermeable areas are draining to, attenuation provisions and where the surface water is ultimately being discharge to. The surface water calculations need to be provided to demonstrate that the run-off from these areas can be accommodated within the proposed attenuation features. In addition, clear information on the modelled fluvial flood level in relation to the attenuation features needs to be provided and surface water calculations need to demonstrate the impact of joint probability events. This is to ensure that the quantum of development proposed at outline stage is achievable and that the surface water drainage proposals comply in not increasing the risk of flooding elsewhere or onsite. In addition to this the locations of the proposed SuDS must clearly be outside of the impacts of the modelled fluvial flood extents

The current strategy outlines that run-off from the site will be restricted to greenfield rates to the existing watercourse but does not explore the opportunity for on-site infiltration. A Hierarchical approach to the disposal of surface water should be undertaken with priority to infiltration of surface water. Infiltration testing must be carried out to assess the opportunities for infiltration to ground. Winter infiltration testing is required to support infiltration drainage techniques and should be carried out in January/February (subject to agreement) and at agreed locations/depths/ Furthermore winter groundwater monitoring is required to support the basins designs and ensure there is no loss in attenuation capacity as a result of high groundwater levels.

The current greenfield estimation for the residential development site is over-estimated as it is taken for 15ha, whilst the development proposals only assume 7ha of impermeable contributing area. The greenfield run-off (if infiltration is proven unsuitable) must be adjusted to reflect the actual contributing impermeable areas.

Once further information is provided on the risk of surface water flooding and impact to the surrounding areas, as well as clarity on the development surface water drainage proposals then we will be able to review the proposals further