

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

Our ref: HA/2022/124003/04-L01
Your ref: FP/274/21/OUT
Date: 15 November 2022

Dear Sir/Madam

FURTHER MODELLING INFORMATION: RE-CONSULTATION - 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 consulting the Environment Agency on the above application.

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

Environment Agency Position

We request that the following **conditions** be attached to any planning permission granted, and that the details in relation to these conditions be submitted and approved by the Local Planning Authority.

The proposed development will only meet the National Planning Policy Framework's requirements in relation to flood risk and if the following planning condition is included.

Condition 1 of 3

The development shall be carried out in accordance with the submitted flood risk assessment (ref FRA December 2021) and the following mitigation measures it details:

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

www.gov.uk/environment-agency

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- Finished floor levels shall be set no lower than 300mm above ground level
- Evidence shall be provided to show the post-development ground levels match those included in the post-development hydraulic modelling.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason(s)

To reduce the risk of flooding to the proposed development and future occupants. To prevent flooding elsewhere by ensuring that compensatory storage of flood water is provided

Condition 2 of 3

No development shall take place until a landscape and ecological management plan (LEMP), including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), has been submitted to, and approved in writing by, the local planning authority. The landscape and ecological management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements:

- details of maintenance regimes
- details of any new habitat created on-site
- details of treatment of site boundaries and/or buffers around water bodies
- details of management responsibilities

Reason

To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy.

Please consult us on the details submitted for approval to your authority to discharge this condition and on any subsequent amendments/alterations.

Development that encroaches on watercourses can have a potentially severe impact on their ecological value. The proposed development will therefore only be acceptable if a planning condition is included requiring a scheme to be agreed to protect an undeveloped buffer zone around the watercourses on site.

Condition 3 of 3

No development shall take place until a scheme for the provision and management of a 5 metre wide buffer zone along either side of the watercourses has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer

zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme (for example, native species)
- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan
- details of any proposed footpaths, fencing, lighting, etc Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected.

Reasons

This approach is supported by paragraphs 170 and 175 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.

This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

Advice to LPA/Applicant

The Environment Agency has a presumption against the culverting of any watercourses and any proposed crossing of retained watercourses on site should be by way of clear span bridges. A Construction Environment Management Plan (CEMP) should be in place and agreed with the Local Planning Authority. As part of this plan Invasive Non Native Species known to be present on the development site must be eradicated and disposed of appropriately.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

