

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

www.arun.gov.uk

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



From: David Innes, Blueprint Planning [REDACTED]
Sent: 23 December 2022 11:51
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Fwd: Bognor Regis Golf Club FP/274/21/OUT

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Please upload to the application file please.

David Innes
[REDACTED]

Begin forwarded message:

From: Owen Jones [REDACTED]

Date: 21 December 2022 at 12:09:27 GMT

To: "David Innes, Blueprint Planning" [REDACTED]
[REDACTED]

Subject: Bognor Regis Golf Club

Dear David, as we discussed yesterday, we have prepared the attached in response to the Lucken Beck correspondence which we received a short while ago. Should you have any queries, please do not hesitate to contact me Kind regards,

Owen Jones
Director

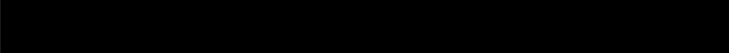
[REDACTED]



21 December 2022

Our Ref: OJ/20.211

David Innes



Dear David,

Bognor Regis Golf Club
HA/2022/124003/01 and HA/2022/124004/01

Thank you for providing a copy of the correspondence from Luken Beck dated 08 November 2022. We note that they consider the proposed redevelopment of Bognor Golf Course for housing may prejudice the delivery of EMP SP3(4) Former LEC Airfield and adjoining land.

Whilst the submitted planning application is not seeking permission for the Enterprise Bognor Relief Road, a corridor of land has been identified at the northern extent of the Site, consistent with the Bognor Enterprise illustration, which will be safeguarded to facilitate the potential construction of that new road in the future. Far from prejudicing the delivery of EMP SP3(4), the proposal would assist in improving its future access position. This is acknowledged by the Council, as set out in the Economic Development consultation response of 28 June 2022 where the proposal "assists access to further employment land".

Before turning to the three principal concerns raised by Luken Beck we would highlight that it is correct that the Application Site is not identified in the Local Plan as a housing allocation. However, as you will be aware the Local Plan's housing strategy intended that a number of strategic allocations would be developed within the plan period and that in addition non-strategic sites would be identified for some 1200 new homes. Neither of these assumptions have come to pass and the planning permission sought does not lead to an exceedance of the housing requirement in the Local Plan.

You will also be aware that EMP SP3(4) has been identified in the Local Plan for a considerable period of time but has yet to be brought forward. I believe I am correct in saying that it was identified in the initial Draft Local Plan of 2014. It was not however part of the proposed Enterprise Zone or the Local Development Order.

At §8.6.6. and §8.6.7 of the Local Plan, the infrastructure requirements associated with Enterprise Bognor are described. Amongst these is the delivery of the link road between the A259 Felpham Way and the BRNRR to enable the development of the former LEC airfield. In turn the Local Plan Inspector's Report comments on this at §55. To the best of our knowledge there is no Link Road scheme beyond the illustrative material shown in the Local Plan and the Bognor Enterprise promotional material. Similarly, there is no funding mechanism or delivery vehicle to construct the new link road; a fact Luken Beck acknowledge in their correspondence. In this context, it is difficult to see how the LEC land can in fact be brought forward for development. Luken Beck make clear it is not their clients' intention to fund that link road and they expect this to be delivered on their behalf by the public purse or other developer contributions.

 www.lrmplanning.com
22 Cathedral Road, Cardiff CF11 9LJ

Registered Office: Nymmer Court, Brunner Road, Billingham Road, Billingham, Solihull, Birmingham B37 7YU • Registered in England and Wales (No. 0645566) • VAT Reg No. 356 0617 46



Notwithstanding these obvious uncertainties, it is alleged that the potential traffic flow from development of EMP3 SP3(4) has not been accounted for in the TA.

It is unclear what the access strategy is being put forward by Luken Beck. In one instance they refer to access from Felpham Way via the leisure centre roundabout to the South and connecting to the A259 to the north. Elsewhere they indicate that a connection to the A259 appears unlikely.

Moreover, it indicates that trips associated with 9,500 sq.m of B1 amounts to 100 vehicle movement in the AM and PM peak hours. It is not clear if this takes account of the sustainable travel measures which the Local Plan refers to at §8.6.8.

The Scope of the applicant's Transport Assessment (TA) was discussed with West Sussex County Council (WSCC) as local highway authority; at their request certain Strategic Allocations were included in the assessment work. At no point was it indicated that the TA should include the potential development at EMP SP3(4) as a similarly committed development. Nor have they said the TA was deficient because of it not having done so. You will be aware that WSCC Highways do not object to the proposed development.

The applicant's highways specialist, RPS, has highlighted that the TA and associated traffic modelling includes for all the committed development sites within the local vicinity that are in the process of or have gained planning permission but not yet constructed and also included for strategic growth allocations based on information that is currently publicly available.

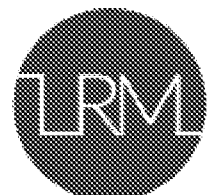
The inclusion of land allocations identified within a Local Plan that have not progressed to an application are difficult to account for as details in respect of access, trip generation, off site mitigation etc., are not identified. As such to ensure that the impact associated with site allocations that will come forward over the Local Plan period are accounted for in the modelling, TEMPRO growth has been applied.

Whilst some of the strategic allocations identified in the Local Plan have been included in the modelling, the TEMPRO growth has not been adjusted and the full growth applied. This equates to an increase in base traffic movements of 7% in the AM Peak and 8% in the PM Peak. TEMPRO growth is based on information provided by local authorities in terms of predicted housing levels and jobs in the area and is applied to the full highway network that is assessed. Therefore, any site allocations identified in the Local Plan that have been added to the assessment in addition to the background growth will result in a high element of double counting, although also ensures a very robust analysis is undertaken.

Notwithstanding the above, RPS has considered the suggested trip rates proffered by Luken Beck. The 100 trips in the peak hour amount to an increase of 2.5% in traffic west of the Leisure Centre roundabout and 3.5% to the east in the AM Peak. In the PM Peak the increase would be 3.3% to the west and 4% to the east. Beyond this junction the percentage impact would reduce as traffic disperses.

It is evident that the background growth assumption is twice this level of impact and therefore is considered a suitably robust assessment.

It should also be noted that the assessment of the Leisure Centre roundabout is shown to operate well within its design capacity with sufficient additional capacity. Moreover, the proposed improvements that will be implemented at the Downview Road signal junction, which is to the east of the Leisure Centre roundabout, will provide a betterment over the existing operation, adding some 28% additional capacity to the operation of this junction. The signal junction assessment includes for the 3-4% increase that may be associated with EMP SP3(4) together with the strategic allocations on land West of Bersted and Land at Barnham, Eastergate and Westergate, plus an additional 3-4% growth at this particular junction.



Beyond the Leisure Centre junction and the Downview Road junction, the impact of traffic associated with EMP SP3(4) will reduce, however the % increase added to the network as background growth remains the same i.e., 7% in the AM and 8% in the PM. The robust analysis also includes for further mitigation on B2259 which is identified in the TA ensuring that any impact associated with the EMP SP3(4) allocation is accounted for.

Lastly, we note the comments regarding the necessary safeguarding of the length of the link road within the Application Site. We have set out our intended approach to this, as well as a commitment to financing the construction of that section of the Link Road (within the redline only), for delivery either by the District or County Council, in various planning application documents and do not repeat that. As highlighted by Luken Beck the detailed provisions will be a matter for discussion in the S106.

I trust that the above is of assistance but please do not hesitate to contact me if you would like to discuss any of the matters raised.

Yours sincerely,



Owen Jones
Director
LRM Planning Limited

