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Sent: Tuesday, May 9, 2023 2:31 PM
To: Planning <Planning@arun.gov.uk>
Subject: Arun District Council Planning Application: FP/274/21/OUT

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COMMENTS

Arun District Council Planning Application: FP/274/21/OUT

OBJECTION

UPDATE

My previously submitted objections have not been ameliorated or mitigated to any significant degree by amendments or resubmissions to the original planning application. Furthermore, I would like to amplify my previous concerns about the suitability of building in a functional flood plain as illustrated in Felpham Parish Council's photographs. I would add that not only is it highly unethical to build and sell properties built on a 3b zone flood plain, regardless of attempts or efforts (successful or otherwise) to reduce the danger of flooding, A portion of the storm water runoff will inevitably gravitate downstream and make the existing problems in Felpham village (particularly the intersection at Felpham Way and Downview Road,) worse than they already are.

ORIGINAL OBJECTION:

Wider context of local housing developments in coastal West Sussex

Taken in the context of the whole of the south coast, more building, even in one village, is just one more blow to rural coastal life. The market garden coastal plain from Chichester to Brighton is now largely replaced by a semi-urban, high-traffic, and increasingly unpleasant conurbation from west of Chichester to Brighton. The designation of the A259 road as urban in 1999 was inaccurate. There does not appear to be any joined up thinking at county or higher level on how to best approach housing, highways and infrastructure planning as the population expands and flooding increases as we also attempt to manage our increasingly extreme weather conditions without ruining our unique landscape and ecology. There are few successes in efforts to address the problems generated elsewhere that result in the movement of people to the south coast. Effects of the build up are that at regular, and increasingly frequent intervals, our coastal frontages and waters are polluted as run-off and effluent is released just off our beaches. Added to the damage inflicted upon the land, rising sea levels, which according to current modelling, predict that seaside towns and villages will be underwater in 10 to 30 years¹ make it even more difficult to comprehend why house building continues, despite the risks.

Local Context

Bognor Regis Golf Club's partners' seek outline planning permission for 480 homes in land primarily in Felpham parish but that includes a small part of Yapton parish. Prior to the pandemic, the Golf Club struggled financially due to declining membership and to a lesser extent lost green fees when the course has been unplayable whilst drying out after heavy rain and flooding, generally during winter. The future of the club looked uncertain and unlikely to remain viable long-term, despite the beauty and excellent design of

the now mature course. Since the pandemic began in 2020, the fortunes of the club have turned around: membership has increased to the point where there is now a waiting list to join. The need to sell the club to raise multi-million pound funds to purchase alternative land and pay for the design and build of a new course is no longer an acute problem, and additional revenue streams could be achieved by other imaginative means. The land proposed for purchase for development of a new golf course is in the same flood plain.

Incompatible Use/Flooding

The area is within an existing flood plain over half of which is designated as high risk of flooding (zone 3). In the Climate [Change.org](https://www.climatechange.org) maps the area earmarked to be built upon is a deeper red than the rest of the flood plain. Felpham Parish Council's own flood map also clearly illustrates the application area as being in the flood zone. Both Felpham Parish Council, Felpham's Local Plan and Arun District Council's Local Plan indicate strong and significant support to reduce flooding in the area. West Sussex County Council's report suggests that the site is generally low risk in some areas. This does not take into account that the golf course is a natural "soak away" for the village, which if altered will bring a whole set of problems – by moving the flooding elsewhere.

The Felpham rife sluice gates by Butlins are closed during high tides to stop sea water backing up into the rife and this exacerbates flooding as the contents of the rife overspill the banks on the area being considered for building.

Mitigation proposals can only result in sending the surplus water downstream to cause problems or else pumped upstream to the Lidsey pumping station outlet, where excess of ground water is sent back down to Felpham beach to be discharged into the sea. The main discharge outlet at Felpham is either from Lidsey pumping station or Bognor Main. There is simply no state or private investment provision for worsening of the flooding and run-off situation where the golf course habitat is no longer acting as a natural drain and houses, roads and pavements are built all over that portion of the flood plain.

Home building in a flood plain at all is an expensive risk for purchasers of property once aware that they are in a flood plain and want flood insurance. The Engineer's report recommends raising the houses, but this could cause foundation problems in houses which are elevated through movement of the landscape and soil which has been improperly compacted (Slope Creep.).

Trees

Trees serve as boundaries, obstacles and shade on golf courses. The present location of the Bognor Regis Golf Club was established in 1922. The Club's own website boasts "Several thousand trees have been planted over the last 50 years to add to the scenic beauty of the course". In addition, the famous golf architect who designed the course, James Braid, established shrubs, grasses, heathland and dew ponds as part of his original design. After 100 years, the additions of the golf architecture and green management will have bedded in well with the native habitat. The original and supplementary habitat created with the golf course will have provided natural "rain garden"¹ floodwater soak-aways over the site. Trees and shrubbery would be uprooted during development, according to the plans, (see tree removal report) worsening the risk of flooding, despite mitigation plans. Destruction of the trees will not just impact water absorption, but air quality which has significantly deteriorated due to the population and vehicular increase and cannot afford to be lost for residents living adjacent to the A259. Naturally, the loss of the trees would have a devastating affect on birds and other wildlife.

Wildlife

The local wildlife that currently enjoys the use of the golf course, is diverse. The site would benefit from a full ecology report to include birds, insects and animal species living there. There are footpaths across the site which must be preserved too, for the benefit of all.

Scale of Development

The type of houses illustrated on Hallam, the developer's website, would be of little benefit to singles/couples trying to get a foot on the housing ladder, retirees and disabled wishing to purchase bungalows, or families wanting multi-generational dwellings, all of which have long been neglected in the local housing market. The proposed dwellings are the more profitable standard 3 bed semi or town house and 4 bed detached which now saturate the local area. In all likelihood, the project, were it to proceed, would likely morph into a building plan for an excess of 600 properties, according to Bognor Golf Club Action Group, who predict that infrastructure and provision for shops, medical, schooling, play, youth activities and transportation facilities, management of wildlife, access to important ancient footpaths and provision for management of our dwindling wildlife will be wholly inadequate.

Local services and facilities are already over-stretched to unacceptable levels. When the houses adjacent to the golf course at Blake's Mead were built, facilities in the form of school, doctors surgery, shops and a football pitch were included in the plans. None of this came to fruition, leaving our schools and most particularly our primary medical services hopelessly over-subscribed to the point of near collapse.

Just as importantly, the water and sewage dispersal infrastructure in Felpham and the surrounding area is badly behind what is already in existence along the whole south coast, and at the point where it is probably unsafe at times to sea bathe or pursue water sports, walk or exercise on the beach at intervals during the year. Even very mildly elevated levels of *e-coli* or other unwarranted pathogens are regularly in the coastal water which of course is Felpham's biggest asset. Southern Water have no plans at the present time to upgrade dispersal facilities that affect Felpham²

Highway Safety

The roads accessing the A27 and A259, and other primary roads in the area are dangerously crowded, particularly from April to October, then on to the end of the Christmas period at the end of December. Even at non-peak times, local residents find the roads are choked and dangerous. With the closure of the Oving crossing, an alternative route into Chichester and the hospital has been removed which is likely to have a serious impact for local area residents and emergency vehicles. Highways England declines to deal with primary traffic route problems with a view to solving them. Local traffic on the A259 to the north of the site is often backed up to the roundabout at the beginning of Blake's Mead due to backlog on the Shripney Bypass and the continuation towards Chichester. This makes this northern access to Bognor, Chichester and the A27 at Fontwell extremely difficult at times for residents and for emergency vehicles.

Traffic and Parking

Adding additional housing in Felpham will only add to local problems. Access to a new housing estate via Felpham Road and Downview Road in the village will cause problems for local traffic and pedestrians. The four way traffic lights on Felpham Road are already busy. This busy junction has vehicular and other traffic moving in all directions around the village, as well as pedestrians walking to the junior school in via Downview Road and towards the Community College (Secondary School) and Leisure Centre westwards down Felpham Road. There is also pedestrian traffic crossing the road further down between the Churchyard and allotments and fields beyond the Leisure Centre. Another road to the estate would need to be cut through to ensure the safety of all vehicular, other and pedestrian traffic, particularly the children.

Local plan.

Felpham's Local Plan sets out a vision for the future planning for the parish in a five year plan. It is an evidence-based instrument reliant upon a process to ensure legitimacy, to include local consultation, a review for soundness of purpose, and full public examination prior to its adoption. Development of Bognor Regis Golf Club for housing is not part of Felpham's plan, and by no stretch of the imagination could be considered compatible.

SUMMARY

The development opportunities of the existing Bognor Regis Golf Club are rewarding only to Bognor Regis Golf Club and its partners. It is a wonder that the agencies who have responded to the development have been so compliant in giving approval, even inline with government building policy, which takes no account of the local situation and problems.. The impact on Felpham its people, services and natural resources, suggests that approval of this venture would be both reckless and detrimental.

¹[Climate Change.org](https://climatechange.org)

2 Arun District Council Planning Application M/16/22/PL

3 <https://felphampc.gov.uk/mapping/flood-risk-maps/>

4 A dip in the landscape filled with plants with water-loving roots which soak up excess rainwater and run-off

5 <https://www.southernwater.co.uk/help-advice/works-or-issues-in-my-area?postcode=felpham>