Principle Planning Officer
Arun District Planning
Maltravers Road
Littlehampton
WEST SUSSEX
BN17 5LF

1 South Road
Felpham
Bognor Regis
WEST SUSSEX
PO22 8EF

9th April 2022

Dear Mr Easton,

Re: Applications M/16/22/PL New Golf Course South of Gravatt's lane
and FP/274/21/OUT housing development on old Bognor Course

My wife and I object strongly to both Applications above.

We have noticed that one of LRM Planning ltd's authors of Hallam's *Lydsey Green ES Vol 2 Main text* is also entered as the Agent for both Applications above. We therefore felt little surprise on coming across some slippery wording in 14.2 of their ES Vol 2:

> **14.2** **Site A is a golf course and accordingly is "non-agricultural land" in the Agricultural Land Classification (MAFF 1988). Therefore, there will be no loss of agricultural land on that part of the site, although there will be a loss of soil resource**. Site B, where both agricultural land and soil resources are affected extends to 77.6 hectares (ha) of mostly agricultural land in agricultural production, where both agricultural land and soil resources are affected.

This is to play on our face-value reading of MAFF's term "none-agricultural land", from which it seems that development could produce no loss of something that has already gone.

MAFF's definition though tells a different story:

> **None-agricultural**
>
> ***'Soft' uses where most of the land could be returned relatively easily to agriculture, including: golf courses,*** *private parkland, public open spaces, sports fields, allotments and soft-surfaced areas on airports/ airfields. Also active mineral workings and refuse tips where restoration conditions to 'soft' after-uses may apply.*

So in fact the agricultural land is still there, as we always thought it would be. It is there to be lost and the authors of course know this, so does this account for their coyly adding *"on*

that part of the site"? Are the authors being prompted by conscience, with honesty nagging too nearby?

Alternatively, might there be just a few carelessly missed out words? What about, for example *… on that part of the site* ***built on****, although…*? Or maybe … on that part of the site ***not built on****, although…*? It's tricky to work out in your mind, but given that no wording we considered seemed to make sense, we don't now believe there can be 'no loss of agricultural land' without there having been no loss of agricultural land. This leaves us with only our first understanding; that it's a clever play on semantics using MAFF's definition, and designed to mislead.

Is it then less than fully salved consciences that have driven the authors to further add *"there will be a loss of soil resource"*? Is this the use of esoteric code, designed to ease their hearts, hoping for a shift of blame to us, for not understanding?

We all know what a resource is. It's something the earth can provide and that, in one way or another, we all need. This may be directly or indirectly through supporting something we are more aware of needing, like food or air. Followed through, we can understand how we would not be here without the many categories of resource soils provide.

Some of soil's most valuable resources come with its life and organic content, concentrated, for the most part, in topsoil, most of which is removed in advance from a building's footprint and associated hard surfaces. So maybe the authors' views are not quite right and the soil resource is not lost but just redistributed, giving a reduced surface and access by which to realise its benefits.

But in any case, we don't believe we could be told exactly what is meant in 14.2, because the paragraph is too conflicted by squirming consciences. Its main objective is clear though; we are meant to think the land has, in some unspecified way, been degraded, through hosting a golf course. This chimes with the applicant's promotion of the Bognor Golf course onto Arun's HELAA register, as brownfield land, which would be laughable, were it not for the serious consequence if believed.

FP/274/21/OUT generally plays down the value to wildlife of the existing Bognor course, mentioning its species-pour, close-cut grass and general golf course characteristics. It is implied that measures would be taken to greatly enhance this value over portions that remain after development, even claiming there'd be a net gain.

But this is, by definition, to miss the value of just space, where both wildlife and humans are concerned. We and wildlife need space and not little pockets, constantly assaulted by children playing, domestic cats hunting and dog walkers being funnelled with other

residents into overcrowded, warn-down, vestigial remnants. Of greatest psychological value to us is a sense of escape; of removal from the hubbub to recharge.

Funnily enough, this is close to some of the pleasure many golfers seek. We know this all the more now through one of the stated reasons for their desire to move; encroaching development. At present we can share in their escape at no expense, when walking footpath 153, but if they have their way and abandon us to our fate, we would be left with the remnants.

The picture would be much rosier for them though. For some strange reason, golf club land over Ancton way is quite different to ours here. The following extracts are from the Gravatt's lane DAS, prepared for Hallam by Urban Wilderness:

> 1.5 Given the arable nature of the land, there is little existing vegetation internal to the site with the exception of that associated with the Ryebank Rife. While limited disturbance to the vegetation is necessary to allow a cohesive routing of the proposed golf course, this disturbance will be mitigated through additional planting and enhancement of that existing. In addition, the resulting golf course under an agreed Management Plan will significantly enhance biodiversity, habitat creation and the overall landscape quality of the land.
>
> 3.35 The proposals will provide substantial and diverse habitat creation including new hedgerows, waterbodies, rough grassland, shrub, and tree planting. This will extend the foraging, commuting and refuge opportunities from the peripheries, to cover the entire site creating a betterment for wildlife recorded onsite as well as encouraging colonisation of wildlife from the wider area. The proposals will also meet the Environment Act 2021 requirement for 10% biodiversity net gain.
>
> 3.42 The proposed development should be considered an opportunity, in terms of arboriculture, to improve and increase tree cover in the local area without the loss of any arboriculturally significant trees.
>
> 5.2 The existing landscape of hedgerows and trees will be supported by a network of proposed new Green Infrastructure which includes new broadleaved woodland, trees and hedgerows, along with extensive areas of wildflower meadow, grassland and wetland habitats. In the long term this will significantly enhance the site's landscape and biodiversity by providing increased habitat creation and connectivity.

So, unlike the old established golf course, the new one would be a wildlife haven, brimming with creatures of every description.

But the ES Vol 2 goes still further, although, to be fair, its 14.30 does first give a more fulsome rendering of MAFF's definition of None-agricultural land:

Site A – Redevelopment of existing golf course

14.30 The golf course falls within the description of "non-agricultural" land in the ALC methodology, (MAFF, 1988). This describes such land as "*soft* uses where most of the land could be returned relatively easily to agriculture, including golf courses". This also includes mineral workings and refuse tips where restoration to soft uses may apply.

But it then goes on to apply this in 14.47, telling us *"It may be that parts of the* [new] *golf course could be returned to agricultural use in future, if required, and that the impact is reversible… "*:

Site B – Relocation of Golf Course

14.45 This section considers the likely direct and indirect effects on agricultural land, soil resources and farm businesses, and whether any effects are permanent or temporary, positive or adverse.

Construction Phase

14.46 The effect on soil and agricultural land resources commences during the construction phase, as soon as the land has ceased to be used for agricultural purposes and the stripping of soil begins.

14.47 These effects on agricultural land are usually permanent. Accordingly, effects that take place at the construction phase typically continue throughout the operational phase, as they are permanent. These effects are also usually adverse. It may be that parts of the golf course could be returned to agricultural use in the future, if required, and that the impact is reversible. This can be covered in a soils Management Plan.

The authors chose not to say anything of this kind over the existing course, leaving us to believe it is already lost from agriculture – despoiled and brownfield, even. Perhaps if 14.2 were to be rewritten, consciences would reassert full control and we'd no longer be led as we were. But we also wonder why a return to agricultural use was mentioned at all, over the new course. And this before it's even been passed, let alone built; what is known about the future that we don't know?

It's nice to feel the authors are human and have consciences. Also that -- just as a soldiers might return from war and say they've only been doing a job – the authors of the ES Vol2 are most probably splendid people to know in everyday life. But in uniform, they are developers. We are now, frankly, disinclined to take seriously anything of the elaborate mountain of paperwork assembled to brow beat us all into accepting this proposal. How could we know what to believe and what not to? How do even the Planners know? And the future – why is LRM even contemplating the return to agriculture of some of the land at the new site?

The FP/274/21/OUT proposal has, in our view, been deviously engineered on the spurious basis that the present Bognor Golf Course is brownfield land. And this with, at most, only 0.6% of it carrying permanent structures outside the built-up-area boundary. Unfortunately, there seems at present no Middleton built-up-area boundary map available online. But it's most probable that -- unlike the current club house, which lies inside the Felpham built-up-area boundary -- the proposed new course would have very much larger permanent structural facilities, lying well outside Middleton's built-up-area boundary. This might strengthen any claim of Brownfield status – at least for a northern portion of the course. In addition, this portion would by then include an already established direct access onto the A259.

This sounds like a developer's dream, so could it be that, when in uniform, the authors can't help themselves from salivating at the thought; is their mention of returning a portion of land to agriculture a sort of Freudian slip?

Like any sport, the popularity of Golf has waxed and waned, but we understand there is nothing encouraging about the current unpredictable circumstance. Perhaps the new course's business model is designed to lure members from the Littlehampton Club, drawn by the stupendous new facilities, built extravagantly at the expense of our suffering around the old course. Whatever the prospects though, we feel sure developers eyes will not have missed an opportunity to watch.

So we feel that residents from near Ancton, some of whom have shown enthusiastic support for FP/274/21/OUT and M/16/22/PL, in the hope of keeping housing development at bay, should be careful what they wish for, as golf clubs do not always make good or steadfast neighbours.

Yours sincerely

Jean and Bernard Shattock