

Grounds for objection – statements March 2022

FP/274/21/OUT

Regarding planning application, FP/274/21/OUT,

Councillor Glen Hewlett proposed that Felpham Parish Council strongly object to this planning application on a number of significant planning grounds and in consideration of the feeling of the committee members.

This was seconded by Councillor Dave Smart and unanimously voted for by committee members.

- 1. EMP DM1 as the land is a viable employment site – Object** on the grounds that the new proposed development has no provision for any kind of alternative/replacement employment. The land is a current employment site. The Golf Club already employs staff both associated with the club house/shop and also the course itself. The loss of the course would have a negative effect on the employment for the area;
- 2. OSR DM1 loss of open space / recreation land in Bognor Regis** – using PROW and established paths the current area is available for all to access in addition to those using the golf facilities. **Object** to the development as if a residential development is permitted on this site a large percentage of the current area available to the public will be lost;
- 3. Protection of remaining space post development** – no details provided as to how this will be secured simply a comment that “it is in perpetuity”. **Object** on the grounds that no long-term ownership relationships or maintenance arrangements. Currently the only protection appears to be the cost of building further houses on flood plain. Illustrative drawings as part of an outline submission are not binding on the applicant.
- 4. The traditional established green “gap”** between Bognor Regis and the surrounding villages will be lost by this development. **Object** as this development will thus also allow neighbouring currently “green” space to be devalued and thus open to further development as having a lower “value”;
- 5. TPO’s** – **Object** as no details given as to the protection of existing trees with existing TPO’s;
- 6. New Planting** – **Object** as no details given of alleged new planting of 2 Hectares of new planting. No details as to who will carry out this work, to what standard or who will monitor the work. No details either of who, in the future, will “own” this planting and be responsible for its maintenance, its husbandry, to what standard and its development. No details given as to who will be financial responsible for this planting nor for how long;
- 7. Hedgerows and Habitat** – **Object** as no details given of protection for existing hedgerows and habitat;
- 8. Biodiversity** – **Object** as no details given of plans to increase biodiversity by 10% nor to what standard or who will monitor the work. No details either of who, in the future, will “own” this standard and be responsible for its maintenance, its husbandry, to what standard and its

development. No details given as to who will be financial responsible for this planting nor for how long;

9. **SD SP3 loss of the gap between settlements** -Part of the overall Arun strategic plan is to retain green corridors between settlements. **Object** as this development would seriously erode that. It would lead to seriously impacting on the identify of Felpham as a village. Currently it has character and a sense of independence from its neighbours, something which must be preserved;
10. **The ADC Local plan, and the Felpham Neighbourhood plan** have both recently been updated and approved/issued. **Object** to this development as neither document identified or listed the site as strategic development site.
This proposal is purely therefore a business led decision and not one which has been identified as a requirement in any housing plan or target that ADC has set. It is therefore clearly excessive development;
11. **Statutory Bodies - Environment agency: Flooding, Rife, water discharges, flood zones, impact from drain water and run off, impact on other areas and/or residential areas -**
According to Beachboy there have been over 50 releases of water from the Lidsey station/Aldingbourne rife to the sea in 2021. This clearly indicates there is already a serious issue over the management of surface/flood water in this and surrounding areas. **Object** as this development would seriously worsen this situation;
12. **Statutory bodies** – as this is an outline application there are no details of responses (if asked) from the statutory bodies (Water, drainage, Utilities, Highways, Environment Agency, Connectivity) thus FPC **object** to this development as there are no details of the capacity of utilities, water and drainage.
13. **Statutory bodies** – There are no details of works required to address working on a flood plain. One of the reasons the Golf Club wishes to move is to increase winter play ability (affecting financial viability) as the course is notorious for flooding. **Object** to this development as the site sits on a flood plain of varying severity
14. **Statutory bodies** – The release of surplus surface water into the sea is already causing problems (flooding 2012) and the western edge of Felpham is shown to be the area with the greatest chance of flooding. **Object** to this development as the erection of a large residential estate will raise the risk. The limited rifes between the projected estate and the sea will not manage the excess water;
15. **Statutory bodies** – Portsmouth Water have previously acknowledged there is an ongoing issue with water pressure in the Felpham area. FPC **object** as this development could put further unsustainable pressure on that system as seen in the north of the County;
16. **Statutory bodies** - With land so prone to water/flooding a risk must exist to supplies both to the proposed development but also the impact on the current network, which is also prone to outages particularly in Blakes Mead. This FPC **object** to this development.
17. **Statutory bodies** - The main disposal pipe from Felpham Pumping Station goes to Ford water treatment plant, currently any heavy rainfall, results in foul and storm water being discharged into the sea/rife. Southern Water has been requested for figures for the capacity of the pressurized main from Felpham to Ford and have not responded. FPC **object** to this development as this development will only worsen the current situation;
18. **Access to proposed parklands/wetlands** – **Object** as no details given re: access to parklands/wetlands + parking for visitors to these areas;

- 19. **Access to proposed parklands/wetlands - Object** as no details given re: Permissive ways (how will these be managed and protected) and PROWS. What treatment will these be given as located in a flood plain. Who will be responsible for them?
- 20. **Access to proposed parklands/wetlands - Object** as the footpaths on the golf club site will become permissive (NOT PROW) which means they could be removed at a later date;
- 21. **Access to proposed parklands/wetlands - Object** to this development as due to flooding no reliance of footways/paths being available can be made.
 - **Flooding** - Road network shown on proposal also in flood zones so prone to flooding. According to Beachboy there have been over 50 releases of water from the Lidsey station/Aldingbourne rife to the sea in 2021.
 - This clearly indicates there is already a serious issue over the management of surface/flood water in this and surrounding areas. This development would seriously worsen this situation.

Object to this development as no details given of any protection;

- 22. **Downview road single point access** - Proposal is for single access point to Downview. Unsafe, road is already busy, especially with school runs and is a residential area. Recent data shows approximately 2,000 cars per day currently using Downview road with the majority being at start and finish times for the Primary and secondary schools. TRA identifies that it is likely that 74% of traffic movements on and off the development will be by private car – it is likely that the majority of houses will have two private vehicles (as shown in Blakes Mead) adding potentially 960 additional road movements per day to this already busy road. FPC **Object** to this development as the road network will become overloaded;
- 23. **Downview road single point access FPC Object** to this development as this is clearly unsafe and does not take account of the significant increase in traffic potentially emanating from the site. Downview road is not suitable for this increase. Prior to this proposal WSCC and Felpham Parish Council considered the road sufficiently dangerous to install speed humps to slow traffic down – latest figure show that by and large this has been successful with the current level of traffic;
- 24. **Downview road single point access - Object** to this development as during any construction phase use of large construction type vehicles will seriously endanger other users of this and adjoining roads as well as all users;
- 25. **Downview road single point access - Object** to this development as Downview Road junction with Felpham Way already observed (e.g. 1450 on 9th March 2022) as overloaded at peak times with queuing traffic going south passed Wroxham Way at traffic lights. Similarly traffic heading east from Felpham Comprehensive school roundabout observed (e.g. 1455 on 9th March 2022) going back passed the controlled crossing point halfway between the Felpham school roundabout and the Downview Road traffic lights;
- 26. **Downview road single point access** - Traffic lights recently rephrased following a cyclist fatality to increase pedestrian and cyclist transit times. **Object** on the grounds of the ability to rephrase further without creating excessive delays at junction;
- 27. **Downview road single point access - Object** to this development. At school drop off and pick up times increased traffic flow and tailbacks observed at Links Avenue and Furze road as traffic seeks alternatives to Downview Road and Felpham Way junction;

- 28. Downview road single point access - Object** to this development as Golf Links road is a residential street the width of two cars. There are no parking restrictions currently. Road is not wide enough to take the additional traffic generated by this development;
- 29. Downview road single point access - Object** to this development as Golf Links Road is integrally linked to Stalham Way and Downview Road which is the main access to Downview school 582 pupils (capacity 480). Thus, there is a conflict between traffic and pupils aged 4-11 as well as a heavy traffic load at peak hours;
- 30. Downview road single point access** - The opening of the Felpham relief road has increased traffic along the A259 (WSCC figures – up 40% in 2019) yet has reduced the traffic anecdotally down the B2259 (formerly the A259). **Object** to this development as this benefit will be lost by the addition of the traffic generated by this new development restoring some of the dangers of a now downgraded road;
- 31. Downview road single point access** - The latest development in Felpham (Blakes mead) has notoriously bad roads with limited width, insufficient residents and visitors parking and insufficient off road parking. **Object** to this development as no details given of proposed treatment on new development or what guidance/policy will be used;
- 32. Downview road single point access - Object** to this development as no means of entry or exit if single point access road is blocked. Blakes Mead estate has an emergency entry/exit;
- 33. Local Public Transport** - Only current bus service is run by Compass. It serves Downview Road before turning into Wroxham way. It has one AM service, at approximately 09.15 and three PM services. The indicated 67 bus frequency is inaccurate, the submitted plan 3.1 shows an hourly off peak service, the actual service is: 09:56 12:16 14:16 16:16, not hourly and none of which are suitable for schools. **Object** to this development as this level of public transport is wholly inadequate to support this new development. Any enhancement must take into consideration schools times, congestion on the local roads, Downview Rd Junction with the B2259;
- 34. Inaccuracies in the transport plan:**
- a. 3.18 indicates 40mph speed limit. This only applies going West and not for the whole route as indicated.
- 35. Transport plan also gives the following figures:**
- a. 4% of people use buses, this equates to an increase of over 50 people (based on 480 homes with 3 occupants on average) using a bus service that is at best limited. The nearest service, the 67, bus could not cope.
 - b. 74% own vehicle usage: This equates to approximately 1400+ extra car journeys if you include out and return. Based on an average of two cars per household. This almost a 75% daily increase on current usage over parts of Downview Rd, a huge increase. Current usage over South end of Downview is just in excess of 2000 vehicles per day.
- 36. Connectivity re: Bognor Regis green Infrastructure framework** - Bognor Regis Green Infrastructure framework has down plans connecting Bognor Regis to South Downs National Park – **Object** to this development as it puts this linkage at risk;
- 37. Habitat loss** – significant wild like exists within the proposed development site notably badgers, deer, foxes. **Object** to this development as their current habitat will be

significantly reduced and thus it is reasonable to suggest that habitat loss will lead to species decline and loss;

38. **Climate Change Emergency** - ADC declared a Climate Emergency on January 15th 2020. In their own document ADC refer to decarbonising their Council Housing stock by 2030. It is thus incongruous that the same Council under its Planning arm will permit further buildings on a severe flood plain and on “green unblemished land” 30% of which will be, in effect, Council Housing. Such a development will lead to a loss of habitat, hedgerows and trees severely impacting on the wildlife that currently lives there and uses the current Greenland as a path to other “green sanctuaries”. The development will create additional carbon emissions during construction and subsequently. The development, at illustrative stage, states 480 dwellings (yet is being openly advertised by the land agents at 600+ units) and thus circa 1500 additional residents and likely 1000 vehicles will be added to the area adding to the current carbon emissions whilst reducing the environmental land available to offset this additional carbon load. Thus **Object** to this development as it runs contrary to the ethos and sentiment of the Local Council (and Planning Authority) own policy and stated aims.
39. **Overdevelopment** - of Felpham. **Object** to this development as it will impact on character of village. Already 5th largest settlement in ADC this will increase that further;
40. **Overdevelopment** - Recent developments in Felpham have moved the centre of the village from the traditional (and a conservation area) original village changing the characteristics and charm of the Parish. **Object** to this development as it will only accelerate the changing of a Sussex village scene to a large small town conurbation;
41. **Precedent** - Felpham has mixed architecture, but latter developments have little or no architecture merit. **Object** to this development as no details offered as to the size and detail of proposed new houses;
42. **Education** - There are no proposals to increase primary and secondary education facilities. It has been reported that there are primary school spaces available in the village at Bishop Tuffnell. Research has shown that this is only 65 spaces and that Downview School is already oversubscribed by 100. Thus, there are insufficient spaces available at 4-11 ages. In addition, freedom of choice is restricted by no new capacity. There has been no mention about Secondary school provision locally. FPC thus **Object** to this development due to the impact on local services;
43. **Health** - There is one overloaded GP practice (anecdotally stating that they could not cope with an influx of this number) in Felpham and the nearest secondary acute facility is in Chichester 12 miles away. Both services are stretched but there is no mention of additional contributions to the provision of additional health services. FPC thus **Object** to this development due to the impact on local services;
44. **Health** - There are no dentist surgeries within 20 miles taking new NHS patients. FPC thus **Object** to this development due to the impact on local services;
45. **Local Facilities** – the application makes great play on the gifting of the current Club house to the local community. No use has been identified. However in the planning statement (page 4 item 2 and page 7 item 1.14) the developer notes that the clubhouse and associated facilities has high operating costs, poor energy efficiency and increasing maintenance costs. Therefore there is no gain to the local community with no defined Community Use. FPC

thus **Object** to this development on the grounds that it would have no benefit from this element of the development and indeed it is likely to have a liability;

46. No details have been given or proposed as to who will ultimately have responsibility for the open/green spaces. Thus as a consequence there is no defined body or person who will have the legal and sometimes very costly riparian responsibilities for;

i. Ditches, waterways etc on these open spaces

ii. Ditches, waterways adjacent to or near properties.

47. **Mr Geoffrey Winch's Objection dated 16/3/22.** – Having read Mr Winch's letter of objection filed on Arun District Council's Planning Portal, we applaud Mr Winch on his detailed report and support his many valid points contained therein. It would not be prudent for us to replicate any parts of his report but wish to echo all of the concerns he mentions within it.

Thus FPC thus Strongly **Object** to this development