

Mr K Roberts
Director of Planning
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

23 Merryfield Crescent
Angmering Village
West Sussex
BN16 4DA

25th SEPT 2018.

Dear Mr Roberts

**RE: PLANNING APPLICATION N^o A/114/18/PL FOR A 70 BED NURSING HOME
TO PROVIDE PALLIATIVE AND ADVANCED DEMENTIA CARE, (LOCATED
ON SITE BOUNDED BY WATER AND DAPPERS LANES ANGMERING, WEST
SUSSEX).**

INTRODUCTION:- As you are aware the above site is owned by the applicant FRONTIER ESTATES.

In DECEMBER 2015 FRONTIER ESTATES held an exhibition in St Margarets Church Hall, Angmering to display their plans and members of their project team were available to answer questions and capture feedback.

It is regrettable that since DECEMBER 2015 adjacent and nearby residents who will be affected by the development after repeated requests for answers to their legitimate questions over the past **THREE YEARS HAVE NEVER RECEIVED ANY REPLIES TO LETTERS OR TELEPHONE CALLS TO ARCHITECTS, PLANNING AND DRAINAGE CONSULTANTS TO THE VERY IMPORTANT QUESTIONS POSED. THIS WELL COORDINATED TACTIC OF NOT ANSWERING QUESTIONS IS PURPOSELY DESIGNED TO MARGINALISE AND AVOID GIVING ANSWERS WHICH COULD BE USED BY RESIDENTS TO UNDERMINE THEIR COMMERCIAL AMBITIONS.**

In MAY 2018 GILLINGS PLANNING LTD circulated a public consultation letter together with **"ARCHITECTURALLY VISUALISED"** views of the 70 BED NURSING HOME; subsequent detailed investigation demonstrated that misrepresentation of facts by GILLINGS had created conditions where upon a complete breakdown of trust between residents and GILLINGS now exists. **(PLEASE SEE ATTACHED COPY OF A LETTER TO MR SROUS, DEVELOPMENT MANAGER DATED 4TH JUNE 2018 TO FRONTIER ESTATES, LONDON OFFICE (ATTACHEMENT (i))**

STATEMENT - 1

WHEN GILLINGS PLANNING ISSUED LETTERS AND COMPUTER GENERATED IMPRESSIONS TO ANGMERING RESIDENTS OF THE PROPOSED 70 BED NURSING HOME AS PART OF THE PUBLIC CONSULTATION PROCESS I CARRIED OUT A DETAILED STUDY OF THE ARCHITECT'S PLANS AND ELEVATIONS AND BECAME AWARE THE COLOURED COMPUTER GENERATED ELEVATION FACING WEST ON TO MERRYFIELD CRESCENT HOMES HAD BEEN **"ARCHITECTURALLY VISUALISED"** GIVING THE IMPRESSION TO THE UNTRAINED EYE THAT THE NURSING HOME OVERALL HEIGHT WAS NOT AS HIGH AS IN FACT IT WOULD BE, I DECIDED TO CONSULT AN EXPERT IN **"ARCHITECTURAL VISUALISATION"** TECHNIQUES WHO CONFIRMED MY SUSPICION THAT MANIPULATION OF VIEWS OF ELEVATIONS HAD BEEN PRODUCED TO REDUCE THE IMPACT OF ACTUAL NURSING HOME MASS AND HEIGHT.

THE SECOND FLOOR ACCOMMODATION IS TO BE PROVIDED WITHIN THE ROOF SPACE AND IN ORDER TO COMPLY WITH BUILDING REGULATIONS, THE REQUIRED HEADROOM WITHIN THE APEX ROOF SPACE IS MUCH HIGHER WHICH RESULTS IN BUILDING HEIGHT BECOMES A THREE STOREY AND NOT A TWO STOREY AS GILLINGS PLANNING HAS STATED.

THE OVERALL HEIGHT IS FURTHER EXACERBATED BECAUSE DAPPERS LANE GRADIENT DROPS DOWN TO WATER LANE RESULTING IN AN EVEN GREATER HEIGHT DIFFERENTIAL WHICH WOULD OVERLOOK DOMESTIC HOMES NUMBERED 25, 27, 29, 31 & 33 MERRYFIELD CRESCENT AND HOMES BEING JUST OVER THIRTY FEET AWAY (30'-0") FROM THE NURSING HOME THEREFORE THE MASS AND HEIGHT OF THE BUILDING WOULD INAPPROPRIATLY DOMINATE OVER THE HOMES OF NEARBY RESIDENTS BEING CLOSE TO THE HEIGHT OF A FOUR STOREY BUILDING WHICH IS UNACCEPTABLE ON BASIC TOWN PLANNING CRITERIA FOR SUCH A LOCATION AND ITS PROXIMITY TO EXISTING DOMESTIC HOMES.

IT SHOULD ALSO BE NOTED THAT THIS LOCATION DOES NOT NOW COMPLY WITH THE CENTRAL GOVERNMENT, ROYAL COLLEGE OF NURSING AND CARE QUALITY COMMISSION INTEGRATED POLICY TO LOCATE SUCH NURSING HOMES WITHIN A "CARE VILLAGE" ENVIRONMENT AWAY FROM NORMAL DOMESTIC HOUSING DUE TO THE NOISE LEVELS OF DEMENTIA PATIENTS SCREAMING PARTICULARLY AT NIGHT TIME AND THE NEED FOR INTERNAL LIGHTING TO BE ON IN ORDER TO ALLOW NURSING TO BE CONDUCTED SAFELY WHICH WOULD AFFECT DOMESTIC HOME OWNERS OPPOSITE.

STATEMENT - 2

The Plot Plan for the provision of **53 EXTRA CARE APARTMENTS AND A 70 BED NURSING HOME** identifies **46 VEHICLE PARKING SPACES**. The numbers of staff coupled with visiting Doctors, Delivery Vans, Ambulances, Relatives and friends to patients will create the problem of parking in surrounding and adjacent roads which already suffer severe parking problems particularly at weekends.

This potential problem needs to be addressed simply because the present DAPPERS LANE has become a "RAT RUN" from 4:30am in the morning until 9:00pm at night.

The proposed entrance to the site is the current entrance to the house "BROADLEES" in DAPPERS LANE which on recent estimates would produce between 275 & 320 **ADDITIONAL TRAFFIC MOVEMENTS PER DAY TO SERVE NURSING HOME AND NIGHT SHIFT STAFF ARRIVING LATER.**

The resultant NOISE AND POLLUTION LEVELS WOULD RISE CONSIDERABLY THEREFORE CONSIDERATION MUST BE GIVEN TO PROVIDING AN ENTRANCE FROM WATER LANE RATHER THAN THE DAPPERS LANE ENTRANCE IN ORDER TO REDUCE NOISE AND POLLUTION TO NEARBY RESIDENTS IF PLANNING PERMISSION IS GRANTED.

CONCLUDING STATEMENT:-

At the request of all affected Angmering Residents we would now ask that you and your staff together with your colleague the DIRECTOR OF ENVIRONMENTAL SERVICES give detailed examination of the many conflicting factors that arise from this highly controversial planning application.

In order that you have all relevant information to hand I have enclosed herewith thoroughly researched important attachments delivered to the Director of Environmental Services so that together you are enabled to consider all interdependent factors which will affect your recommendation to the Development Control Committee in due course.

It is very important for MEMBERS OF THE DEVELOPMENT CONTROL COMMITTEE together with yourself as Director of Planning to be informed of the unprecedented number of residents in opposition to this planning application all of whom regard the **LOCATION, BUILDING HEIGHT AND MASS COUPLED TO INCREASES IN AIR AND NOISE LEVELS OF POLLUTION RESULTING FROM VERY MUCH HIGHER VOLUMES OF TRAFFIC ON AN ALREADY "RAT RUN" BUSY DAPPERS LANE.**

Finally, the lack of sewage disposal capacity which currently suffers regular overflows requires considerable capital investment to cater for the enormous daily effluent flow rates which would be generated by the 53 EXTRA CARE APARTMENTS AND NURSING HOME IF DEVELOPED, clearly this is a matter of deep concern to existing domestic residents on public health grounds.

COPIES OF THIS LETTER HAVE BEEN DISTRIBUTED TO THE UNDERLISTED RECIPIENTS:-

COUNCILLOR. D. WENSLEY. J.P
DEPUTY LEADER OF ARUN DISTRICT COUNCIL

ALL RELEVANT ANGMERING PARISH COUNCILLORS

CHIEF CLERK – ANGMERING PARISH COUNCIL

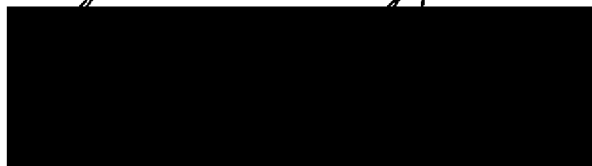
MR K. ROBERTS – DIRECTOR OF PLANNING – ARUN DISTRICT COUNCIL

Ms. P. DART. - DIRECTOR OF ENVIRONMENTAL SERVICES - A. D. C.

LIST OF ATTACHMENTS:-

- i. LETTER TO MR S ROUS, DEVELOPMENT MANAGER FRONTIER ESTATES, DATED 4TH JUNE 2018
- ii. LETTER FROM SOUTHERN WATER HIGHLIGHTING NEED FOR ADDITIONAL CAPACITY TO BE IMPROVED OF OFFSITE SEWERS DATED 28TH JULY 2016
- iii. SITE PLAN SHOWING ROUTE OF EXISTING 4" DIA SEWAGE NETWORK RUNNING UNDER FRONT GARDENS OF HOUSES IN MERRYFIELD CRESCENT TO MANHOLE IN WATER LANE WITH REGULAR OVERFLOWS & FLOODING DUE TO LACK OF CAPACITY
- iv. DETAILED COMMENTS AND OBSERVATIONS – SHEETS 1 TO 3
- v. REVISED UPDATED CALCULATIONS – 53 APARTMENTS AND 70 BED NURSING HOME – FOUL WATER SEWAGE FLOWS
- vi. MINIMUM STAFFING REQUIREMENTS – 70 BED NURSING HOME

Yours Sincerely,



Ms P Dart
Director of Environmental Services
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

23 Merryfield Crescent
Angmering Village
West Sussex
BN16 4DA

25th Sept. 2018

Dear Ms Dart

**RE: PLANNING APPLICATION N^O A/114/18/PL FOR A 70 BED NURSING HOME
TO PROVIDE PALLIATIVE AND ADVANCED DEMENTIA CARE, (LOCATED
ON SITE BOUNDED BY WATER AND DAPPERS LANES ANGMERING, WEST
SUSSEX).**

INTRODUCTION:- As you may be aware the above site is owned by FRONTIER ESTATES. It is regrettable that since DECEMBER 2015, adjacent residents directly affected together with those who would be indirectly affected by this proposed development and after repeated requests for answers to their legitimate questions over the past three years have **NEVER RECEIVED ANY REPLIES TO LETTERS OR TELEPHONE CALLS TO ARCHITECTS, PLANNING OR DRAINAGE CONSULTANTS TO THE VERY IMPORTANT QUESTIONS POSED.**

During the above three year period I have undertaken detailed research and investigation into the reasons for **SEWAGE OVERFLOWS IN MERRYFIELD CRESCENT AND WATER LANE WHICH IS A SERIOUS HEALTH HAZARD TO RESIDENTS AND THE GENERAL PUBLIC.**

In addition I have held a series of discussions with **SOUTHERN WATER AND THE ENVIRONMENT AGENCY THE OUTCOMES BEING EXPLAINED IN THE APPROPRIATE SUB-HEADINGS IN THIS LETTER.**

EXISTING DRAINAGE & SEWAGE INFRASTRUCTURE.

- i. THERE IS NO DRAINAGE INSTALLED IN DAPPERS LANE FROM "BROADLEES" TO WATER LANE.
- ii. THERE IS NO MAIN DRAINAGE GOING WEST IN WATER LANE UNTIL THE WATER LANE AND WEAVERS HILL JUNCTION AT WHICH POINT IN WATER LANE A SOUTHERN WATER MANHOLE COVER **REF N^O TQ 070 425 01** IS LOCATED; **PLEASE REFER TO ATTACHED DRAINAGE ROUTE MAP ATTACHED HEREWITH. (ATTACHEMENT – ii).**

- iii. ATTACHED HERewith IS A LETTER FROM SOUTHERN WATER DATED 28TH JULY 2016 WHICH STATES **"ADDITIONAL OFF-SITE OR IMPROVEMENT TO EXISTING SEWERS WILL BE REQUIRED TO PROVIDE SUFFICIENT CAPACITY TO SERVICE THE PROPOSED DEVELOPMENT" (ATTACHMENT i)**
(NOTE:- 4" DIA SEWER PIPE RUNS UNDER FRONT GARDENS IN MERRYFIELD CRESCENT)
- iv. OVER THE LAST FIFTEEN MONTHS (15 MONTHS) OVERFLOWS OF RAW SEWAGE HAS OCCURRED IN MERRYFIELD CRESCENT AND WATER LANE DUE TO A LACK OF SEWER CAPACITY REQUIRING LONG PERIODS OF HOSING FRONT GARDENS AND DRIVEWAYS WITH MAINS WATER TO DILUTE RAW SEWAGE, CLEARLY THIS IS UNACCEPTABLE AND IS A SERIOUS HEALTH HAZARD.

EXISTING LARGE 70 YEAR OLD BRICK BUILT SEWAGE COLLECTION CHAMBER WHICH SERVED THE "BROADLEES" HOUSE NOW 70 YEARS OLD AND IS LOCATED IN DAPPERS LANE OPPOSITE N^O 25 MERRYFIELD CRESCENT.

The Planning Consultant to FRONTIER ESTATES Gillings Planning has stated that the developer's intention is to leave it and **NOT DEMOLISH THE CHAMBER.**
Consultations with the ENVIRONMENT AGENCY has resulted in their stating:-

SEWAGE CHAMBERS AND CESSPITS HAVE TO BE FORMALLY LICENSED BY THE ENVIRONMENT AGENCY AND WHEN NO LONGER REQUIRED NEED TO BE DEMOLISHED AND CLEARED SAFELY IN ACCORDANCE WITH STRINGENT C.O.S.H.H. REGULATIONS, (CHEMICALS OR SUBSTANCES HAZARDOUS TO HEALTH)

As Director of Environmental Services you will be aware that PLANNING APPROVAL FOR A 53 UNIT EXTRA CARE APARTMENTS APPLICATION WAS APPROVED IN 2017 by the DEVELOPMENT CONTROL COMMITTEE. All of the aforementioned information was given to COUNCILLOR P. BICKNELL six months prior to the Development Control Committee meeting and on **JULY 10TH 2018 I WAS ABLE TO CONFIRM WITH HIM THAT HE DID NOT PASS THIS VITAL INFORMATION SEEKING URGENT ANSWERS TO YOU FOR ACTION.**

The failure of Councillor Bicknell to carry out his constituency duty has left a large number of residents at this very late stage to **OBTAIN URGENT ANSWERS FROM YOUR DIRECTORATE AS FOLLOWS:-**

QUESTION 1 - **WOULD YOU PLEASE MAKE KNOWN TO RESIDENTS HOW THE LARGE DAILY VOLUME WHICH WOULD BE PRODUCED BY THE 53 UNIT EXTRA CARE APARTMENTS WHEN COMPLETED BE CATERED FOR AND WHERE IT WOULD BE CONNECTED TO ON THE EXISTING 4" DIA PIPEWORK WHICH IS NOT SUFFICIENT TO COPE WITH**

**CURRENT HIGH VOLUME FLOWS AND SUFFERS
REGULAR OVERFLOWS?**

QUESTION 2 - **IF THE PROPOSED 70 BED NURSING HOME IS GRANTED
PLANNING PERMISSION CAN SOUTHERN WATER AND
THE DEVELOPER PROVIDE THE CONSIDERABLE
FUNDING NECESSARY TO INSTALL NEW OFFSITE
ADDITIONAL CAPACITY TO SERVICE THE SITE AS A
WHOLE AND WHICH WOULD PRODUCE AN
ADDITIONAL 321,604 LITRES OF EFFLUENT DISCHARGE
PER WEEK ON TOP OF EXISTING DOMESTIC HOUSING
EFFLUENT WHICH CAUSES OVERFLOWS AT PEAK
TIMES.**

QUESTION 3 - **CONSULTATIONS WITH THE ROYAL COLLEGE OF
NURSING AND THE CARE QUALITY COMMISSION HAS
RESULTED IN OUTCOMES AS IN SPECIFIC SUB-
HEADINGS AS FOLLOWS:-**

CONSULTATION WITH ROYAL COLLEGE OF NURSING

First, the R.C.N advised there are 147,000 Nursing Vacancies in all grades and in particular **SPECIALIST NURSES QUALIFIED IN THE CARE OF PALLIATIVE AND
ADVANCED DEMENTIA CARE OF PATIENTS.**

The Counties where such resources of specialist nurses is acute are, SURREY, WEST
SUSSEX, EAST SUSSEX, ESSEX AND KENT.

CONSULTATION WITH CARE QUALITY COMMISSION

The C.Q.C. advised that during their inspection of some Nursing Homes the problem of not having the correct **RATIO OF REGISTERED SPECIALIST NURSING STAFF TO
PATIENTS AND IN SOME CASES HAD TO BE PLACED UNDER "SPECIAL
MEASURES" IN ORDER TO ADDRESS THE IMPACT OF THE NURSING
SHORTAGE.**

FOLLOW UP ACTION REQUIRED. IT IS ESSENTIAL FOR THE DIRECTORATE OF
ENVIRONMENTAL SERVICES TO INFORM THE DIRECTOR OF PLANNING AND
MEMBERS OF THE DEVELOPMENT CONTROL COMMITTEE OF THE R.C.N &
C.Q.C OBSERVATIONS.

QUESTION 4 -

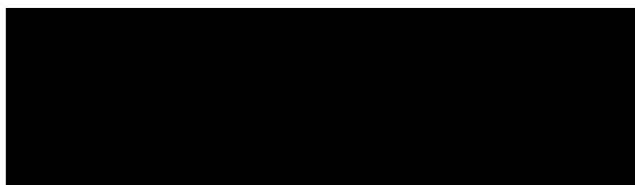
**DEMOLITION OF EXISTING HOUSE "BROADLEES"
WHICH IS 70 YEARS OLD IS KNOWN TO CONTAIN
ASBESTOS WHICH WAS IN COMMON USE IN 1948 WHEN
THE HOUSE WAS BUILT. DEMOLITION SHOULD NOT
START UNTIL EXTENT OF ASBESTOS PRESENT CAN BE
ESTABLISHED. WOULD YOU PLEASE INSTRUCT
FRONTIER ESTATES TO COMPLY WITH C.O.S.H.H AND
RELEVANT LEGAL CONDITIONS**

SPECIAL NOTE:- The Directorate of Environmental Services has a significant role in the monitoring and control of work on site.

Attached herewith are **DETAILED COMMENTS AND OBSERVATIONS SHEETS 1 TO 3. ATTACHED HEREWITH (ATTACHMENT iii)**

CONCLUSION:- All residents and myself are seeking an early response to the questions posed and would also request a meeting with Ms. P. DART or her nominated officer with a view to highlight the need for the **DEVELOPMENT CONTROL COMMITTEE TO BE MADE FULLY AWARE OF THE SERIOUS ISSUES INVOLVED AND THE SUBSTANTIVE REASONS WHY THE APPLICATION FOR A 70 BED NURSING HOME SHOULD BE REJECTED.**

Yours sincerely



J.F. BECKENHAM
CHARTERED PROJECT MANAGER

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COUNCILLOR. D. WENSLEY. J.P
DEPUTY LEADER OF ARUN DISTRICT COUNCIL

ALL RELEVANT ANGMERING PARISH COUNCILLORS

CHIEF CLERK – ANGMERING PARISH COUNCIL

MR K. ROBERTS – DIRECTOR OF PLANNING – ARUN DISTRICT COUNCIL

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- vi. MINIMUM STAFFING REQUIREMENTS – 70 BED NURSING HOME

ATTACHMENT - (1)

MR. S. ROUS,
DEVELOPEMENT MANAGER,
FRONTIER ESTATES LTD.,
25, OLDBURY PLACE,
MARYLEBONE,
LONDON. W1U 5PR

23, MERRYFIELD CRESCENT,
ANGMERING,
WEST SUSSEX,
BN16 4DA.
4TH JUNE 2018.

Dear Sir,

RE:- PLANNING APPLICATION FOR A 70 BED NURSING HOME
FOR PALLIATIVE AND ADVANCED DEMENTIA CARE - SITE LOCATION
ON LAND BOUNDED BY WATER LANE AND DAPPERS LANE,
ANGMERING, WEST SUSSEX, BN16.

I am writing to you as the Development Manager on behalf of owner occupier residents who will be affected, directly and indirectly, by the above proposal.

As you will be aware, FRONTIER ESTATES LTD., have appointed GILLINGS PLANNING to advise on the application who sent a letter to residents together with a COMPUTER GENERATED ARTIST'S IMPRESSION WITH VIEWS LOOKING NORTH, EAST, SOUTH & WEST OF THE COMPLETED DEVELOPMENT which was received by residents on 14th MAY 2018 WITH A REQUIREMENT FOR COMMENTS BY 21ST MAY 2018 - NAMELY FIVE WORKING DAYS - CLEARLY AN UNREASONABLE REQUEST.

It is with deep regret that I must inform you of the COMPLETE BREAKDOWN OF TRUST BETWEEN THE COMMUNITY AND THE APPOINTED CONSULTANT DUE TO THE DISINGENUOUS AND PERNICIOUS PRACTICES DEPLOYED BY THE CONSULTANT AND THE DISINFORMATION SENT TO RESIDENTS TO COMMENT UPON.

The reasons for creating an atmosphere of mistrust are as follows:-

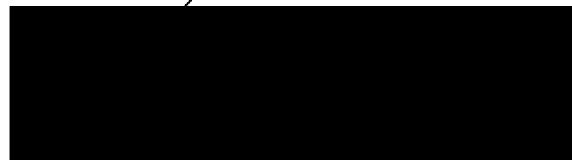
- (1) THE COLOURED COMPUTER GENERATED VIEWS ARE A COMPLETE FALLACY OF AN ARTIST'S IMPRESSION OF THE 70 BED NURSING HOME. A DETAILED EXAMINATION OF YOUR APPOINTED ARCHITECT'S DRAWINGS OF THE NURSING HOME HAVE BEEN STUDIED BY A PROFESSIONAL "ARCHITECTURAL VISUALISATION" SPECIALIST WHO HAS CONFIRMED THE USE OF WELL-PRACTISED MANIPULATION AND MASKING TECHNIQUES TO DECEIVE THE UNTRAINED EYE AND TO REDUCE THE TRUE SCALE OF THE PROPORTIONS OF OVERALL HEIGHT AND VISUAL IMPACT OF THE NURSING HOME BUILDING IN RELATION TO THE CLOSE PROXIMITY OF NEARBY RESIDENT'S HOMES OPPOSITE THE NURSING HOME.

- (2) THE OVERALL HEIGHT DIMENSIONS OF THE THREE FLOOR NURSING HOME – NAMELY – GROUND, MIDDLE AND TOP FLOOR DESIGNED WITHIN ROOF SPACE REQUIRES ROOF TO BE STEEP, AND THEREFORE HIGHER, IN ORDER TO ALLOW PROVISION OF ACCOMMODATION WITHIN TOP FLOOR LEVEL.
- (3) NURSING HOME HEIGHT DIFFERENTIAL RELATIVE TO PRIVATE HOUSING OPPOSITE.
- (a) OVERALL HEIGHT OF NURSING HOME = 11.15 METRES (36'-7")
 - (b) OVERALL HEIGHT OF RESIDENT'S HOMES OPPOSITE = 6.9 METRES (22'-8")
 - (c) THEREFORE, NURSING HOME TOWERS ABOVE RESIDENT'S HOMES BY A MASSIVE 4.24 METRES (13'-11").
- (4) THE HEIGHT OF NURSING HOME WILL BLOCK SUNLIGHT RISING IN THE EAST TO RESIDENT'S GARDENS THEREBY REDUCING A LIFE ENHANCING ENVIRONMENTAL AMENITY.

I have written to the Planning Consultant on the 21st May 2018 with a series of observations and a request during a telephone conversation for answers to important questions – it should be noted that during the course of the original application in 2016/17 which used TURLEYS services and your colleague Mr JAMES ANDERSON, repeated requests via innumerable telephone calls and letters NEVER PRODUCED A RESPONSE AT ANYTIME!

In conclusion, the loss of trust between TURLEYS and now GILLING'S PLANNING with the community is due to their deliberate MARGINALISING of concerned residents by NOT responding to LEGITIMATE QUESTIONS on the one hand and the issuing of contrived information on the other; such reprehensible conduct is UNPROFESSIONAL AND LACKS THE REQUIRED AND EXPECTED HONESTY, TRANSPARENCY AND PROFESSIONALISM FROM YOUR CONSULTANTS.

Yours sincerely,



Copied to:-

CHARTERED PROJECT MANAGER

WARD & PARISH COUNCILLORS

ATTACHMENT-(II)

Mr J Beckenham
23 Merryfield Crescent
Angmering Village
West Sussex
BN16 4DA

Our Ref:
8000899792

Date:

28 July 2016

Contact:

(RECEIVED 29TH JULY 2016)

Dear Mr Beckenham,

RE: Planning application for Dappers Lane, Angmering

I am writing following our conversation on 21 July 2016, regarding your concerns about the above application. Unfortunately, I have been unable to contact you by telephone to discuss this matter further.

I have been liaising with our Developer Services department and can confirm that we have carried out assessments for the site based on foul waste treatment only. This indicates that we have inadequate capacity currently within the local foul sewerage network to accommodate a flow of 4.1 l/s at manhole reference TQ07042501. The proposed development would increase flows to the local network and as a result, existing properties and land may be subject to a greater risk of flooding.

Additional off-site sewers or improvement to existing sewers will be required to provide sufficient capacity to service the proposed development.

Southern Water have made no representation to surface water on the site and this would be down to the Local Authority to approve methods such as soakaways, sustainable urban drainage or watercourses discharged from the site.

In relation to the proposed Wastewater Treatment plant, this would fall into the remit of the Environment Agency (EA) to approve / reject. Should the developer offer this to Southern Water for adoption under a S104 agreement, we would first need to ensure that it complies with the necessary standards. Before Southern Water consider this proposal, consent from the EA would need to be obtained and produced to back this up.

The capacity of the Wastewater Treatment Works would not be the responsibility of Southern Water as it is on the developer's site.

21
Southern Water cannot object to the development from connecting in to our network. However, we would always request a mode and method study and capacity checks to support the proposed flows (foul flow only). We would seek through planning conditions to influence the developer to provide the necessary infrastructure to support the site.

I hope this has been of assistance to you and addressed your concerns. However, if you have any further questions or concerns, this would best be done over the telephone to prevent delay or possible confusion. I would be very happy to talk with you on my direct line of [REDACTED]

Yours sincerely
[REDACTED]

ATTACHMENT - (100)

EXISTING SEWAGE NETWORK
4" DIAMETER PIPES

WSX

989

OFFICE COPY



BROADLEES
CESSPIT
CHAMBER

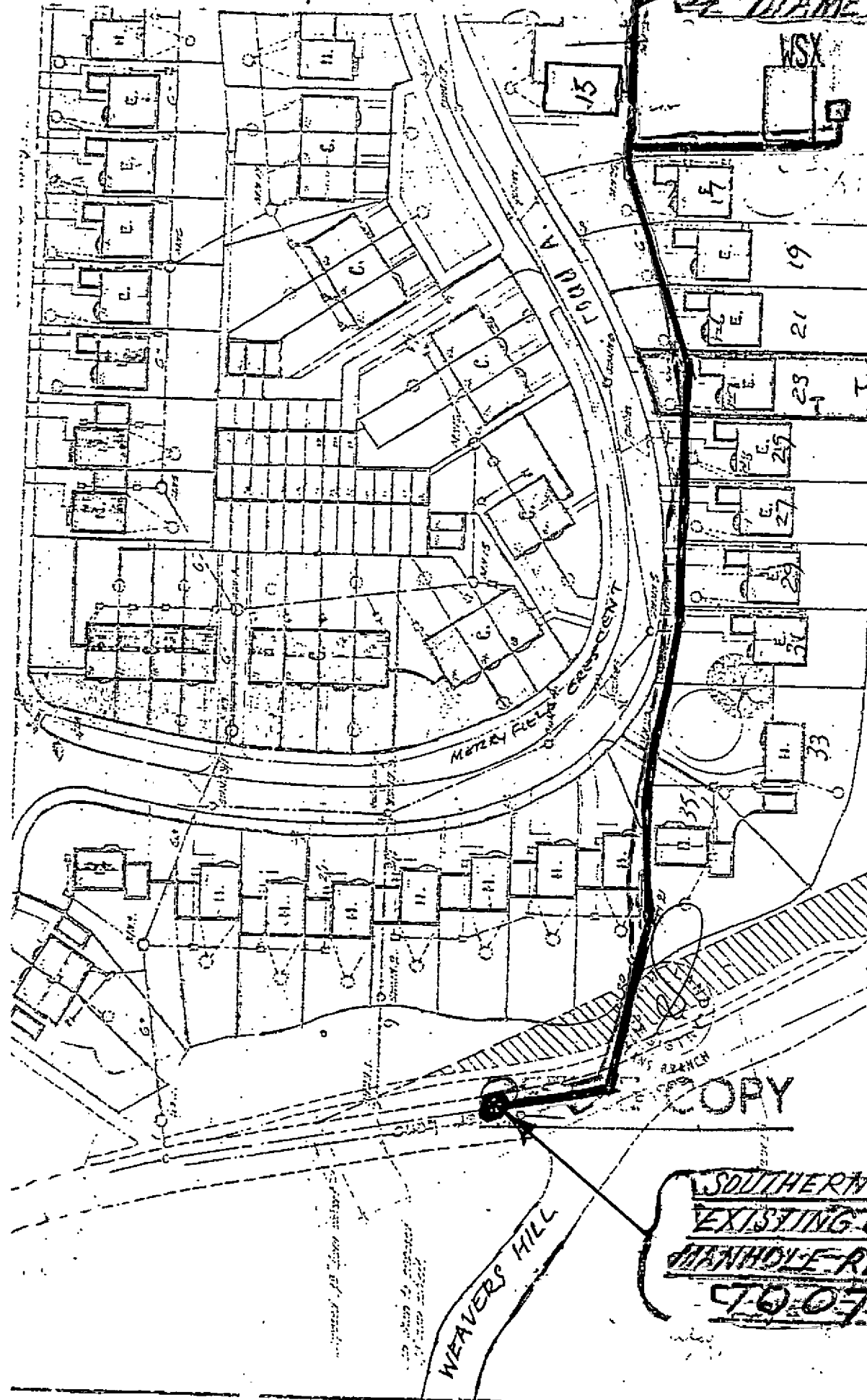
DAPPERS LANE

WATER LANE

COPY

SOUTHERN WATER
EXISTING SEWAGE
MANHOLE REF. NUMBER
70-07042501

WEAVERS HILL



DETAILED COMMENTS AND OBSERVATIONS ON THE
"RECOMMENDATION REPORT FOR PLANNING PERMISSION"
REF N° A/27/16/PL

LOCATION:- BROADLEES, DAPPERS LANE, ANGMERING

PROPOSAL:- **ERECTION OF 53 CARE APARTMENTS WITHIN
CLASS C2, PARKING, ACCESS FOOTPATH,
LANDSCAPING & ASSOCIATED WORKS.
DEPARTURE FROM THE DEVELOPMENT PLAN.**

INTRODUCTION:-

Following the granting of an initial Planning Approval by the Development Control Committee of Arun District Council on the 30th November 2016, and subject to the receipt of a signed "LEGAL AGREEMENT" (expected by 25th January 2017) the underlisted comments, observations and recommendations have been thoroughly researched and compiled and are the result of a detailed study of the content of the report to Committee.

1. CONSTRUCTION DESIGN & MANAGEMENT REGULATIONS-2015

The above regulations came into force on 6th April 2015 and are more onerous in their compliance framework than at anytime since 1994.

Under these revised regulations it is first important to appoint a "PRINCIPAL DESIGNER" who has responsibility for generating the "CONSTRUCTION PHASE" PLAN.

It is important to recognise that under the CDM REGS 2015 nearly everyone involved in construction projects has legal responsibilities as "DUTY HOLDERS" and includes the CLIENT, ARCHITECT, ENGINEERS, CONSULTANTS, MAIN & SUB CONTRACTORS, DIRECTORATES OF PLANNING AND ENVIRONMENTAL SERVICES AND NEARBY RESIDENTS OF THE LOCAL COMMUNITY, TOGETHER WITH ANGMERING PARISH COUNCIL OFFICERS.

**2. DEMOLITION OF EXISTING ON SITE BUILDINGS AND REMOVAL OF AN
EXISTING RAW SEWAGE COLLECTION PIT WHICH SERVES
"BROADLEES"**

It is essential for the underlisted regulations to be included in the Construction Management Plan.

Specific regulations:-

- a) ENVIRONMENTAL PROTECTION ACT 1990
- b) ENVIRONMENTAL PROTECTION ACT 1995 (IV) AIR QUALITY
- c) CONTROL OF SPECIAL WASTE REGULATIONS - 2001
- d) C.O.S.H.H REGULATIONS-2002 (CHEMICALS OR SUBSTANCES
HAZARDOUS TO HEALTH)

All of the foregoing regulations are applicable to works of Demolition but in the case of the on-site house - "BROADLEES" built in 1948 the original owner made known that ASBESTOS was used in parts of the building which requires action as follows:-

- a) SPECIALIST SURVEY TO DETERMINE EXTENT OF ASBESTOS
INSTALLED.
- b) APPOINTMENT OF A SPECIALIST CONTRACTOR TO REMOVE ASBESTOS
AND A LICENCE TO DISPOSE OF ASBESTOS.

- c) The House "BROADLEES" is served by a "RAW SEWAGE COLLECTION PIT" adjacent to DAPPERS LANE which requires regular emptying; again this must be removed by specialists under the demolition contract and is subject to the C.O.S.H.H Regulations 2002
- d) SITE CLEARANCE OF VEGETATION, BUSHES & SMALL TREES
It is imperative that all vegetation is cleared and removed from the site and burning of vegetation on site is not to be allowed at any time – Regulations apply under the Environmental Act-1995 (IV) AIR QUALITY.
Close control is required bearing in mind that many residents are in very close proximity to the site.

3. CONSIDERATE CONSTRUCTORS SCHEME

Well managed and controlled Main Contractors together with their Subcontractors are usually and voluntarily signed up to the above scheme and its objectives and as "DUTY HOLDERS" are fully aware of the need to maintain compliance with all applicable regulations.

In addition, Contractors are to RESPECT THE COMMUNITY at large and to engage with them in cooperating fully in dealing with any legitimate complaints that may arise.

A further aspect is to be aware of environmental issues which may become apparent during demolition and site clearance and in particular noise and control of dust.

On the WEST SIDE OF DAPPERS LANE WATER MAIN SERVICES FEEDING INTO THE HOMES OF RESIDENCES IN MERRYFIELD CRESCENT HAVE BEEN FRACTURED BY VERY HEAVY LORRIES PARKING ON THE VERGES INTERRUPTING WATER SUPPLY SOMETIMES FOR SEVERAL DAYS.

Dappers Lane is a very heavily used narrow road and traffic commences at about 4-30am and is traversed by large agricultural plant, a BUS SERVICE and is in constant use by commercial Vans and Lorries together with School Buses and parents delivering and collecting children from school.

Indiscriminate parking MUST BE CONTROLLED.

All of the foregoing objectives are set out in greater detail in the "CONSIDERATE CONSTRUCTORS SCHEME PAPERS" ATTACHED HEREWITH.

- 4. The report identifies the requirement for a "CONSTRUCTION MANAGEMENT PLAN" to be submitted to the Council for approval, the content of which must be in full compliance with the "Construction Design & Management Regulations-2015" together with specific Acts and Regulations all of which would be applicable to the works of construction on this development.

CONSTRUCTION PHASE PLAN

When the above plan is completed by the "PRINCIPAL DESIGNER" it is recommended that RESIDENTS REPRESENTATIVE be supplied with a copy of the plan for comment and overall monitoring purposes and keeping residents informed.

In addition, it is also recommended that the RESIDENTS point of contact should be the "PRINCIPAL DESIGNER" (NAME AND TELEPHONE NO WHEN APPOINTED)

HISTORICAL NOTE (a) Over the last three years or so Housing Development in and around Angmering has on many occasions been a source of unnecessary problems due to Contractors poor on site management, considerable amounts of mud on roads due to them not washing wheels when leaving site coupled with inconsiderate parking of Vans & Lorries damaging

grass verges resulting in need of reinstatement at considerable expense to the local Parish Council.

HISTORICAL NOTE (b)

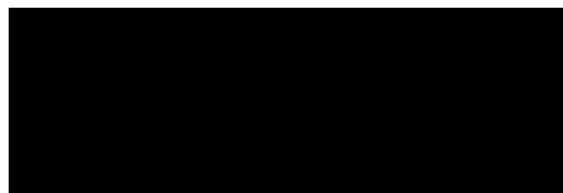
It is regrettable that during the course of the Planning Application procedure the lack of transparent and informative answers to legitimate enquiries and questions regarding the proposed development put to consultants and council officers has resulted in Angmering residents feeling deliberately marginalised by a perceived and well coordinated policy of evading answers by not returning telephone calls and acknowledgement of letters; this is unprofessional conduct and undermines the establishment of trust.

5. CONCLUSION:-

It is recommended that the DIRECTORATES OF PLANNING AND ENVIRONMENTAL SERVICES include the specific additions of identified and listed relevant ACTS AND REGULATIONS under SECTION N° 2 of this report within the "CONDITIONS" OF THE PLANNING APPROVAL.

Finally, it would also be helpful for the Director of Environmental Services to make known the NAME AND TELEPHONE NUMBER OF THE COUNCIL OFFICER NOMINATED TO BE THE LINK WITH RESIDENTS ON AS REQUIRED BASIS.

Note:- The writer of this Report is a CHARTERED PROJECT MANAGER and wishes to engage with the Councils nominated Officer together with the "PRINCIPAL DESIGNER" when appointed.



ATTACHMENT **M**

UPDATED CALCULATIONS.

A REVISED PLANNING APPLICATION IS TO BE MADE BY DEVELOPERS FRONTIER ESTATES TO CONSTRUCT A 70 BED NURSING HOME FOR PALLIATIVE AND ADVANCED DEMENTIA CARE ON THE "BROADLEES" SITE LOCATED ON CORNER OF DAPPERS LANE AND WATER LANE, ANGMERING, WEST SUSSEX.

- 1.0 THIS LATEST REPORT SETS OUT THE UPDATED CALCULATIONS OF SEWAGE EFFLUENT FLOWS RESULTING FROM THE INCREASED NUMBERS OF PATIENTS AND STAFF FROM THE DEVELOPMENT AS A WHOLE, WHICH INCLUDES THE 53 N^O EXTRA CARE APARTMENTS ALREADY APPROVED.
- 2.0 THE FOLLOWING CALCULATIONS HAVE BEEN BASED UPON CONSULTATIONS WITH THE ROYAL COLLEGE OF NURSING AND CARE QUALITY COMMISSION AND LOCAL NURSING HOMES.
- 3.0 THE CALCULATIONS FOR THE ALREADY APPROVED 53 UNITS OF EXTRA CARE ACCOMMODATION COMPRISING 45 – 2 BED AND 8 – 1 BED UNITS PRODUCES 105,000 LITRES/WEEK OR 23,330 GALLONS PER WEEK OR 124 TONS PER WEEK OF EFFLUENT FLOWING INTO THE ALREADY OVERLOADED SEWERAGE NETWORK.
- 4.0 **CALCULATIONS:-**
CALCULATIONS FOR A 70 BED NURSING HOME IS BASED UPON TYPICAL PATIENT USAGE OF 176 LITRES OF WATER PER DAY **PLUS** 100 LITRES PER DAY TO CATER FOR PATIENTS WHO REQUIRE FREQUENT CLEANSING DUE TO INCONTINENCE AND WASHING OF SOILED BED CLOTHES AND BED LINEN.

5.0 CALCULATIONS FOR DAILY DEMAND – PATIENTS, STAFF AND VISITORS.

N^O OF PATIENTS = 70 PERSONS

- $70 \times 276 \text{ LITRES} = 19,320 \text{ LITRES/DAY}$

N^O OF MEMBERS OF STAFF – MANAGER, NURSES, CLEANERS, CHEFS AND CARE ASSISTANTS = 52

- $52 \times 176 = 9152 \text{ LITRES/DAY}$

N^O OF VISITORS PER DAY – DOCTORS, RELATIVES, FRIENDS

N^O OF VISITS PER DAY = 30 PERSONS

- $30 \times 30 \text{ LITRES} = 900 \text{ LITRES/DAY}$

WATER DEMAND FOR CLEANING, COOKING, WASHING BED LINEN & CLOTHING = 3000 LITRES/DAY

TOTAL WATER DEMAND THROUGHOUT A 24 HOUR PERIOD

- i. NURSING HOME PATIENTS = 19,320 LITRES/DAY
 - ii. TOTAL ONSITE STAFF = 9152 LITRES/DAY
 - iii. TOTAL FOR ALL VISITORS = 900 LITRES/DAY
 - iv. TOTAL FOR CLEANING, COOKING = 3000 LITRES/DAY
- NURSING HOME GRAND TOTAL = 32,372 LITRES/DAY**

6.0 THE TOTAL WEEKLY DEMAND FOR WATER BY THE 53 EXTRA CARE APARTMENTS AND NURSING HOME IS:-

53 EXTRA CARE APARTMENTS = 105,000 LITRES/WEEK

70 BED NURSING HOME = 226,604 LITRES/WEEK

OVERALL GRAND TOTAL = 321,604 LITRES/WEEK

321,604 LITRES/WEEK CONVERTED TO GALLONS = $321,604 / 4.5 = 71,468$
GALLONS/WEEK

WHICH EQUALS 380 TONS OF EFFLUENT/WEEK

SPECIAL NOTE:-

THE CALCULATED VOLUME OF EFFLUENT COULD BE HIGHER UNDER CHANGES TO RATIOS-PATIENT/NURSING NUMBERS.

7.0 "SOUTHERN WATER" OBSERVATIONS

DISCUSSION AND A SUBSEQUENT LETTER FROM "SOUTHERN WATER" CONFIRMED THAT THE CURRENT DRAINAGE AND SEWERAGE INFRASTRUCTURE IN ANGMERING IS INADEQUATE AND THEREFORE ANY ADDITIONAL INCREASE IN FLOWS WOULD RESULT IN A GREATER RISK OF EXISTING PROPERTIES AND LAND FLOODING TAKING PLACE.

RECENT HEAVY RAIN HAS RESULTED IN RAW SEWAGE EFFLUENT OVERFLOWING IN MERRYFIELD CRESCENT AND WATER LA ^{NE} (PLEASE SEE COPY OF ATTACHED LETTER FROM SOUTHERN WATER DATED 28TH JULY 2016)

8.0 CONCLUSION

IT IS CLEARLY EVIDENT THAT FRONTIER ESTATES, GILLINGS PLANNING, ARUN DISTRICT COUNCIL PLANNERS, SOUTHERN WATER AND ENVIRONMENTAL SERVICES DEPT; TOGETHER WITH ANGMERING PARISH COUNCIL URGENTLY ADDRESS THE UNSUITABILITY OF A 70 BED NURSING HOME TO BE ESTABLISHED ON THE WATER/DAPPERS LANES SITE AND THE SERIOUS PROBLEMS THAT WOULD INEVITABLY ENSUE.

CLEARLY THE OVERALL COSTS TO INSTALL INFRASTRUCTURE CAPACITY TO CATER FOR THE ADDITIONAL VERY LARGE INCREASED EFFLUENT FLOWS WOULD BE CONSIDERABLE BUT ESSENTIAL TO SECURE THE OVERALL SYSTEM FROM FLOODING AND PREVENT RISKS TO PUBLIC HEALTH.

ATTACHMENT (M).

MINIMUM STAFFING REQUIREMENTS

PLANNING APPLICATION N^o A/114/18/PL FOR A 70 BED NURSING HOME TO PROVIDE
PALLIATIVE AND ADVANCED DEMENTIA CARE (LOCATED ON SITE BOUNDED BY WATER
AND DAPPERS LANES, ANGMERING, WEST SUSSEX.)

RECOMMENDED MINIMUM STAFFING LEVELS AS ADVISED BY THE ROYAL COLLEGE OF
NURSING AND CARE QUALITY COMMISSION FOR 70 BED NURSING HOMES.

SPECIAL NOTE:- THE NUMBER OF SPECIALIST REGISTERED NURSES MAY NEED TO BE
HIGHER IF THE RATIO OF ADVANCED DEMENTIA PATIENTS IS GREATER.

CENTRAL GOVERNMENT, R.C.N & C.Q.C INTEGRATED POLICY DIRECTION OVER THE LAST
FIVE YEARS IS FOR NURSING HOMES TO BE LOCATED AWAY FROM DOMESTIC HOUSING
DEVELOPMENTS AND IN QUIET ENVIRONMENTS TO ENSURE REDUCTION OF NOISE LEVELS
GENERATED BY DEMENTIA PATIENTS WHICH WOULD IMPACT UPON NORMAL DOMESTIC
HOUSEHOLDS CLOSEBY.

CENTRAL GOVERNMENT HAS ALREADY SEEN £315 MILLION ALLOCATED TO PROJECTS
AND A FURTHER £76 MILLION PER YEAR FROM 2018 FOR DEVELOPERS TO BID FOR
PROPOSED SCHEMES.

MAKE UP OF MINIMUM STAFFING REQUIREMENTS FOR A 70 BED NURSING HOME.

- i. MORNING SHIFT – 4 REGISTERED NURSES AND
MORNING SHIFT – 12 CARE ASSISTANTS
- ii. AFTERNOON SHIFT – 2 REGISTERED NURSES AND
AFTERNOON SHIFT – 10 CARE ASSISTANTS
- iii. NIGHT SHIFT – 2 REGISTERED NURSES AND
NIGHT SHIFT – 8 CARE ASSISTANTS
- iv. 2 – CHEFS AND 2 – KITCHEN ASSISTANTS
- v. 4 – CLEANERS
- vi. 1 – MANAGER AND 1 – DEPUTY MANAGER
PLUS – 1 – ADMINISTRATOR
- vii. 1 – MAINTENANCE MAN
1 – DECORATOR
1 – GARDNER

NOTE:- TOTAL STAFF EMPLOYED TO SERVICE 70 BED HOME IN SHIFTS = 52 STAFF MINUS 3
STAFF WHO WOULD BE NORMAL DAYTIME WORKERS (MAINTENANCE, DECORATOR
AND GARDNER