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Dear Mrs. Gardner,

Please register the statement below as an objection to the application listed under the reference M/28/20/DOC. This is in lieu of a paper submission, receipt of which cannot be guaranteed in the current situation. I request that the content be considered and that it be uploaded onto the planning portal.

Thank you.

Yours sincerely,

Timothy Kerss

I am writing to register an objection to the application made under reference M/28/20/DOC, regarding proposed drainage work at the former Yapton Poultry Farm.

The reasons for my objection are as follows:

1. This work is being carried out under the auspices of planning application M/45/16/PL, which is for 13 residential properties on the site. However, the continued validity of this application has been challenged, and is currently the subject of a stage 2 complaint. There is copious evidence to show that, in a desperate attempt to keep the latter application valid beyond its expiry date, Frontier Estates did not adhere to pre-conditions pertaining to the commencement of work on the site, and Arun District Council's Development Planning officers were complicit in allowing this to happen. Accordingly, I submit that work associated with this planning application should not be permitted until the actions of Frontier Estates and ADC have been fully investigated and independently judged to have been valid.
2. In light of real-world evidence I contest the content and evidence presented by SLR consulting Ltd. in the report that has been submitted for approval. It is well-known to local residents, and has been highlighted in other objections to this notice, that during winter months the area in the vicinity of the site is particularly prone to flooding, and that the ditch to the south of the site into which run-off water is planned to flow was full of water during recent heavy rain. The report relies on interpretation of public-domain data, manuals and on readings that have been allegedly taken on sporadic dates, rather than actual regular visual observations of the site.
3. The report submitted by SLR contains anomalies that should be challenged, however, before addressing those individually I want to point out one over-arching flaw. In section 9 of the report, entitled "closure", the author states in the second paragraph that the data was collected by "a third party", that it has not been verified, and therefore the conclusions based on it cannot be guaranteed. In other words, all conclusions and statements based on data made within the document may, or may not, be true! This "get-out clause" has allowed conclusions to be drawn, and swingeing statements to be made, without fear of reprisal should they be incorrect. It removes all credibility

to the data presented and conclusions drawn from it. This report should therefore be seen for what it is; a meaningless sham, which is not suitable for purpose and cannot be considered to give an accurate account of drainage on the development site. Without independent verification of the data used Arun District Council would be culpably negligent in accepting an unverified report at face value, for approval. Accordingly, given this, and the fact that the report was actually commissioned by Frontier Estates themselves, I would like to know what measures ADC's planning department have taken to ensure the accuracy and validity of the readings and results presented.

4. Turning to the report itself, Figure 2-1 shows ground water levels measured over time at just one of the three sites referred to in table 2-1 (WS02). It is notable from table 2-1 that this is the site that recorded the greatest depth of water below ground level, and hence indicates the least chance of flooding. Why are there no graphs for sites WS01 and WS03? Surely, with a higher starting point these would have recorded higher peak water levels (ie closer to ground level) than the bore hole WD02. Again, why is the data from these sites not referred to? Moreover, no information can be found in the report regarding the locations and actual ground level datum for the sample points. This effectively renders the data meaningless, and suggests an attempt to cherry pick data to conceal the fact that the ground water issue is far more significant than represented.

Given that the development site sits about 0.5 metres above road level, water at the levels indicated by the graph would flow into the road and exacerbate local flooding of the highway and nearby property. A low bund is suggested as a solution, but experience suggests that water flows around such devices, and therefore this solution would not prevent flooding onto the Yapton Road and beyond.

5. I also question the accuracy of figures given regarding effective surface water run-off from the structures and ground that currently feature on the site. At para 5.5.2 the report states that the latter amounts to 0.36 ha, as opposed to 0.3 ha for the planned 13 dwellings and their attendant hard-standing. In other words it would have the reader believe that the current site, which comprises a house and a few outlying farm buildings, as shown at Appendix 1 of the report, has an effective run-off 20% greater than a 13-residential home development with impervious roads and footpaths and associated vegetation. This distorts the figure calculated for the existing maximum discharge rate into the ditch given in table 5-4 which, in turn, is used to mitigate against the increased maximum flow associated with the proposed development to justify the statement that "it will not be significant" or even reduced. I seriously question the validity and intent of this assessment, and request that it be reviewed by an independent assessor.

6. As others have noted, one has to wonder why, at the height of a serious pandemic, Frontier Estates have chosen to pursue the issue of drainage matters on this site. To my mind, the answer could be sinister. This may well be an underhand attempt to address a different agenda whilst the "attention of the World is elsewhere". In 2019 Frontier submitted a planning application for a 66-bed care home (M/80/19/PL). The pre-conditions for this plan also included similar requirements to address drainage issues, and required that percolation tests be carried out over the winter period before building work could commence. Such tests would have been carried out over the winter 2020/21, and would thus have imposed a delay to a potential start of construction. In the face of an overwhelming number of objections, and evidence of over-development, the care home application was refused on 5th February 2020. However, it is considered likely that Frontier Estates will appeal against this decision, and that the application will then be reviewed by an independent Appeals Official in a different locality.

7. It is my belief that, if an appeal is successful, Frontier will use the data produced for this application (M/28/20/DOC) as evidence that the requisite drainage tests have been carried out to meet the pre-conditions laid down for the care home. I submit that this would be wholly inappropriate. The footprint of this building together with its associated road, car park, footpaths and patios will be significantly greater than the 13 dwellings of the current plan, and this, in turn, will result in greater run-off. Moreover, by definition, each of the 66 bedrooms will have individual bathrooms which, together with a laundry and washroom facilities for staff and visitors will result in a far greater discharge of foul water into Southern Water's sewerage network than that of the extant scheme referred to in para 7.1.

I also submit therefore that this application must not be considered as sufficient evidence to meet the drainage pre-conditions for an appeal against the care home decision.

Once again, please register this submission as an objection to M/28/20/DOC.