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10th Oct. 2020

Dear Sirs,

In addition to my previous message of objection to Planning Application M/68/20/PL I wish to raise the following important points as added reasons for objecting to this plan:

**1. Drainage Analysis:**

I believe that the "Flood Risk Assessment and Drainage Analysis" document is severely flawed for the following reasons:

- a. The report does not at any point take into account the fact that the proposed care home will feature a basement that, by my calculations, will displace at least 825 cubic metres of soil, which form part of the absorption characteristics of the land. By definition this would have a significant effect on the water absorption and thus flood risk to the surrounding area. However, this has **not** been considered.
- b. The water table analysis carried out between May 19 and March 20 was minimal and open to question. Only one data logger (at WS02) was used to provide continuous data; a point that, by admission within the report was not well placed to provide the most meaningful data for the care home site. The report claims that those at the more meaningful locations were "vandalised". A professional company should surely, over a ten-month period, have had ample opportunity to fix the issues! However, this did not happen, and instead they have extrapolated data obtained from the WS02 site, claiming that it is a fair representation of trends at the other sites from which they took just 4 dip readings across the period. However, as the Figure 2-1 shows there were clear discrepancies, and in March 2020 the readings at both of the other sites exceeded those at WS02 by a considerable margin. The WS01 figure is nearly a metre higher than that at WS02! However, the author of the report chooses to base their conclusions on WS02 data, quoting the highest figure from this point, rather than the others. Accordingly, the report is clearly nonsensical, and its validity should be questioned.
- c. I believe that the data presented is insubstantial and incomplete; it simply does not paint a true picture of the drainage problems at and around the site. Over recent years there have been numerous severe flooding events in the area during which Yapton Road has been underwater for a considerable time. There is a real need for a proper drainage analysis to be carried out taking into account the factors above. Not to do so would amount to culpable negligence by the Council's drainage officer.

## **2. Concurrence with the Arun Local Plan:**

In their description of the proposed Care home plan Frontier Estates claim that their proposal accords with various development plans outlined in the Arun Local Plan. I do not believe this to be true. Specifically:

- a. H DM2: The scheme would not be easily accessible by foot or public transport to healthcare and community facilities. Moreover, the design and scale of the scheme are not “appropriate to the local context”.
- b. D SP1: The proposed development does not “reflect the characteristics of the site and local area in layout, density, mix, scale, and massing”. It is simply too big for the location, and is out of character with the surrounding neighbourhood. It will not enhance “attractiveness, health and wellbeing, and does nothing to mitigate climate change and enhance habitats”.
- c. D DM1: The sheer mass of the proposed structure weighed against the size of the plot and location adjacent to residential housing does not “improve upon the character of the surrounding area, in terms of scale, massing, aspect, siting, layout, density and design features”. It will not “have minimal impact to users and occupiers of nearby property and land”. It will not “embrace innovative design, new technologies and construction techniques” in fact, Frontier Estates’ build the same design in many locations; this would be no different. The scale of this development would not “keep within the general confines of the overall character of its locality”, and it will certainly not “bring a substantial improvement”. Furthermore, the requisite security provision will involve intrusive dusk-to-dawn lighting.
- d. T SP1: This development would not “provide safe access on to the highway network, contribute to highway improvements and promote sustainable transport”. It will do exactly the opposite by forcing extra vehicular traffic down a small residential road, and increase traffic flow through the hotspots at Comet Corner and the Yapton Road Roundabout. Furthermore, it does nothing to promote sustainable transport. The significant distance to the nearest bus stops and cycle ways will lead to greater vehicular traffic, not less. Indeed, it is difficult to see how this development would meet any of the criteria laid down in paragraphs a. to g. of TSP 1.

Furthermore, the developers have made no attempt to address other elements of the Plan, including the requirements of ECC SP2 (Energy & Climate Change mitigation), T DM1 (Sustainable development & Public Rights of Way), T SP3(a) (Protection of Comet Corner), ENV DM5 (Development & Biodiversity), W SP1 (Water & Flooding), QE DM2 (Light Pollution), QE DM3(d) (Improvement of Highway network).

Overall, this proposed development is wrong for the location for many, many reasons as evidenced by the weight of local opposition shown by the mounting number of objections to the scheme by local residents.

To approve it would be a travesty, and would be a crime against the environment and the village of Middleton.

Yours faithfully,

Timothy Kerss