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13th October 2020

Timothy Kerss
3 Silver Birch Drive
Bognor Regis
West Sussex
PO226SE

Case Officer: Mrs A Gardner
Telephone: 01903 737529
Email: Anita.Gardner@arun.gov.uk

Dear Sir/Madam,

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application No: M/72/20/DOC
Site Address: Land West of Yapton Road (Poultry Farm) Middleton-On-Sea PO22 6DY
Description of works: Approval of details reserved by condition imposed under ref M/45/16/PL relating to Condition Nos 11 - surface water drainage, 13 - discharge flows to watercourses and 14 - SuDs.

Thank you for your internet representation made on 12th October 2020 which has been recorded as an objection with the comments as follows:

OWPC30250

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

a. 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.

b. 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.

I note that this application is in respect of the extant plan for the construction of 13 residential homes on the site. I believe that it would be totally inappropriate to use this analysis as an acceptable drainage report for either of the 66-bed care home applications that have been submitted for approval and appeal by Frontier Estates. The impervious surface area of such monolithic structures will be approximately twice that of the 13-house plan. Surface water run-off will be significantly greater, as will the amount of waste water. Furthermore, the incorporation of a basement in the care home will displace a considerable amount (approx. 825 cubic metres) of water-absorbing soil. This would heighten significantly the risk of flooding in the area.

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments on the website. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at :<https://www.arun.gov.uk/planning-decision-process>.

Some applications will be determined by the Development Control Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/weekly-lists>

Any comments that are received after the agenda has been finalised will be separately reported to the members of the Development Control Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website www.arun.gov.uk/planning-privacy-statements

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.