

MIDDLETON-ON-SEA PARISH COUNCIL



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Assistant Director Planning Services
Planning Services
Arun District Council
Arun Civic Centre
Maltravers Road
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20th October 2019

Dear Sir

Re: Planning Application M/80/19/PL–Former Poultry Farm Land West of Yapton Road – demolition of the existing structures and redevelopment to provide a new 66 bedroom care home (Use Class C2) arranged over two storeys together with associated access, car and cycle parking, structural landscaping and amenity space provision.

At the meeting of the Parish Council's Development Control Committee held on the 16th October 2019, the committee unanimously agreed to **OBJECT** to this planning application on the following grounds.

- **Arun District Council Local Plan 2011-2031 Objectives** – One of the objectives is to ensure that adequate infrastructure provision is secured to serve any new development, another is the protection, conservation and enhancement of the natural and built environment. The points that are being raised in this letter will outline the grounds why these principle objectives have not been met and therefore this planning application should be **REFUSED**.
- **The proposed development is overbearing** – with 66 bedrooms on a small site the site looks cramped, some care homes have been refused on bigger sites with less bedrooms
- **The proposed development is unneighbourly** – the site will be viewed by all properties along Yapton Road
- **The overall mass, height and scale is out of keeping with surrounding properties** – the planning application states it is two storey but with windows in the roof space it could be seen as three storeys
- **Out of character with the streetscene**

- **Overdevelopment of the site.**
- **Proposed development will impinge on the privacy of adjoining properties**
- **Location of Development – Traffic & Travel Demand** – this application if approved will materially affect the existing road congestion at both the roundabout exiting from Silver Birch Drive and creating even more traffic on the A259 at the Comet Corner junction.
 - The roundabout exiting out of Silver Birch Drive which according to the Travel Report will see an additional 145 vehicle movements per day could become an accident blackspot due to traffic entering onto the roundabout from Silver Birch Drive being unable to see traffic coming onto the roundabout on its right hand side due to a blind corner which obstructs the drivers view and has seen a number of accidents and near misses.
 - The Travel Report suggests that car sharing needs to be considered, this does not work and therefore more cars will be used than those in the report.
 - The use of buses is restrictive, there is no Sunday service and depending on shift changes staff may not be able to get last bus from Middleton, so more cars will be used than those in the report.
 - The Transport Report does not reflect what we believe to be the more accurate traffic movements in and out of the proposed development.
- **Car Parking within Development**
 - Plans originally showed 26 car parking spaces which has now been amended to 29, we believe with the number of staff, handover periods, visitors etc. the increase is still not enough to meet these requirements and therefore vehicles will look to park in Silver Birch Drive. Vehicles may also look to park on the spur road leading onto the site which will make it difficult for larger vehicles to gain entry
- **Foul & Surface Water Drainage**
 - Surface water flooding is a concern if no significant improvements have been made or will be made so that the flooding issues in 2012 are not repeated
 - The surface water overflow with high rainfalls will flood the roads and nearby properties.
- **Risk of Flooding**
- The area of the proposed development is shown to be within an area of high risk from groundwater flooding.
- West Sussex County Council have not objected to this application and based their decision on modelling data only and state that there results are insufficient to determine peak ground water levels. Infiltration should be utilised to its maximum potential.
- West Sussex County Council also states that to assess the viability of a drainage scheme groundwater monitoring for the full winter period (October to March) needs to be completed and submitted alongside winter infiltration testing to BRE 365, or similar approved at the expected location and depth of proposed infiltration structures. This must be above the maximum recorded groundwater level in that vicinity. How can this application be considered without this

information and why has West Sussex County Council therefore not objected to this application.

- This area has flooded six times between 1963-2014 with 2012 seeing Yapton Road and surrounding areas being flooded to a depth of 1 metre
- **Loss of Trees & Trees with Tree Protecting Orders**
 - A number of trees are to be removed and there are trees on the site with protection orders which are close to the entrance of the site and these trees and especially their roots need to be protected by the building contractor. It is important that these TPO's are protected and although some evidence is shown within the reports on how this might happen we feel that more protection is needed. What are the consequences if the building contractor cuts down a TPO tree and how can we assess that the measures laid down in the report will protect the trees following construction if this planning application is approved.
- **Personal Safety on the Public Highway**
 - If members of the public are walking to the site or leaving the site they have to go down dimly lit paths, roads and in some cases cross over the road to get back onto a pavement this is especially dangerous during night time periods and the application does not appear to acknowledge this as a problem and highways do not appear to insist that lighting is provided within Yapton Road so the public can feel safer.
- **Potential of Asbestos on site**
 - Although the application states that no asbestos is on site we believe there is the possibility that the site does contain asbestos and if this is disturbed then there is a threat to local residents and those workers on site, we require assurances that asbestos is not on the site.
- **Stage 1 Road Safety Audit**
 - West Sussex County Council Highways have raised an objection that the above audit has not been undertaken and therefore not provided within this application. We require this to be undertaken so the recommendations can be assessed before this application is considered.
- **S106/Construction Infrastructure Levy Agreement**
 - There appears to be no S106 agreement which would show funding to Middleton-on-Sea. With the problems stated above we believe there is a need for a significant contribution towards the cost of traffic lights or a roundabout at the Comet Corner junction as the impact of this development clearly shows the additional traffic movements at this very busy and dangerous junction.
- **Request for site visit by Arun District Council Planning Committee**
 - Based on all the points raised in this letter we believe it will greatly assist your committee if they made a visit to the site to gain a greater understanding of the implications that will be faced if this application is approved.

The Parish Council Development Control Committee therefore OBJECT to Planning Application M/80/19/PL and request you vote to REFUSE it.

Yours faithfully

Joe Lake
Parish Clerk