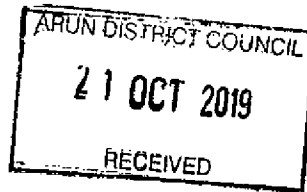


20 Silver Birch Drive
Middleton-on-Sea
West Sussex
PO22 6SJ

Planning Department
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF



14 October 2019

Dear Sir / Madam,

Ref: PLANNING APPLICATION M/80/19/PL - POULTRY FARM, YAPTON ROAD

I am writing with respect to the above planning application to register the following objections to the plans as submitted.

This application appears to involve a very large commercial development and its significant associated traffic, accessed through what is effectively a single-lane side road off a quiet residential street.

Before I address the application, however, I would like to point out that only two planning application notices have been placed by the Council near to the affected site, neither of which are clearly visible to those who drive down Silver Birch Drive – the road that will be materially and detrimentally affected by this development, as I describe below.

When a previous application was made for this site, a notice was placed on the lamppost on Silver Birch Drive opposite the end of the proposed access road. There is no notice there this time, meaning few who travel along Silver Birch Drive are likely to see that a development on this scale, impacting the road, is being proposed and have an opportunity to object.

I believe therefore for this reason that **the consultation process in relation to this development has been insufficient** and I would suggest strongly that, as before, an additional Council notice needs to be placed as described above on Silver Birch Drive itself and the deadline for comments extended, so that those for whom Silver Birch Drive is a key travel route but have been unaware of these plans are also given a fair chance to submit their views.

In relation to the application itself, I would like to bring to the council's attention that the Transport Assessment document submitted on 30/09/2019 as part of this planning application is completely deficient and misleading in numerous, highly material ways.

If approval were to be granted based on a face value reading of this document, then the council would be giving the go-ahead to a development that contradicts planning guidelines and which, consequently, is likely to cause severe harm to the neighbouring community.

There are four main ways in which, I would like to submit, the Transport Assessment document for this application is defective and completely misleading:

1. Access

The development's Transport Assessment gives some attention to the 'cul-de-sac' side road off Silver Birch Drive that is intended as an access road to the site. Yet, despite referring to the width of many surrounding roads, this document conveniently manages to omit that this side road is not a full width road. In practical effect, it is a single lane road, certainly for larger vehicles.

In addition, the development's plan proposes that the access road into the site, beyond the end of the existing cul-de-sac, will curve away from direct line of sight for vehicles seeking to turn into the access road from Silver Birch Drive.

These two features of the plan combine to create serious potential access problems that will materially impact on the nearby community. It means that access to the site involves a long stretch along the entirety of which effectively (and certainly if a larger vehicle is involved) only one vehicle at a time can move in either direction.

It also means that vehicles seeking to turn into the development will have difficulty seeing that the full length of the access route is clear before turning into the access road and that there is consequently a very strong likelihood of such vehicles waiting stationary for an extended period in Silver Birch Drive to turn into the access road if another vehicle is exiting the site at the same time.

In the highly likely scenario that two vehicles meet on the access road, one or other would have to manoeuvre out of the way, leading to a safety concern of potential reversing manoeuvres back onto a busier road like Silver Birch Drive – especially if, as is disproportionately likely, the vehicle involved is a restricted visibility vehicle, like a van or larger.

The government's National Planning Policy Framework requires development proposals to "allow for the efficient delivery of goods, and access by service and emergency vehicles." The plans as submitted with respect to use of this access road very obviously do not meet these requirements.

The proposed vehicle access arrangements for this application breach development guidelines and are completely unacceptable for a development of this size.

An added likely exacerbation of this situation is that cars belonging to local residents or their visitors are often already left parked outside houses in the vicinity of the entrance to the proposed access road, at such times reducing even Silver Birch Drive itself to a single lane. A yet further exacerbation is the significant deficiencies of the proposed car parking aspects of the development, described in section 3 below, only increasing the likelihood of nearby on-street parking causing obstructions.

2. Traffic

It is notable from the developer's Transport Assessment document that the prediction is for a very significant **additional 145 vehicle movements daily** to use the defective access arrangements described above to enter and exit the site onto Silver Birch Drive. Given this document's other understatements and omissions, particularly in relation to visitors and others using the car parking provision, even this high figure for vehicle movements is likely to be a considerable understatement.

The potential for the above-described problems to occur and create chaos many times a day is therefore extremely high. According to their document's figures for 12-hour traffic flow on Silver Birch Drive itself, **this application estimates that additional daily traffic down that narrow side access road will be equivalent to 16% of the entire daytime traffic for Silver Birch Drive - very likely more.** It is simply not credible or practical and will inevitably cause traffic problems.

There is a further issue when this traffic, having exited the access road, reaches the roundabout of Silver Birch Drive with Yapton Road. I would also like to advise the council, based on years of local experience, that this exit can already be extremely dangerous.

Cars approaching this roundabout from the direction of Middleton village can see from some distance away that there is no-one to whom they must give way either on the roundabout or approaching the roundabout from Ancton Lane. They often therefore continue at speed across the roundabout. For those of us exiting Silver Birch Drive, however, our view to the right of this traffic approaching from Middleton village, to which we must give way, is extremely restricted by a protruding high wall. To us, therefore, cars to which we must give way often appear suddenly and at considerable speed onto the roundabout.

Personally, there have been many occasions on which I have had to slam on the brakes to give way to a car speeding across in front of me that I could only see once I had already partially entered the roundabout.

To therefore propose to put at the very least 145 more vehicle movement daily from Silver Birch Drive through that roundabout I believe represents a very serious safety issue. While I can see that the Transport Assessment has done some kind of audit of accidents in the area and dismissed any safety concerns, this of course does not represent the full picture. Incidents like the several near misses I alone have experienced are of course not reflected in the assessment. Putting significantly more traffic through an already - even borderline - dangerous exit onto that roundabout will only increase the likelihood of a serious accident and injuries. I believe there is a serious safety deficiency of this application in this respect.

3. Parking

Even taking at face value the figures within the Transport Assessment document, despite its other major omissions, the car parking provision is completely insufficient.

The document says at various points that there will be 20-25 staff on-site at any one time, that there will be 27 parking spaces plus 2 disabled bays, and that at the peak afternoon shift change there are likely to be 8 arrivals and 8 departures.

Based on a realistic assumption of 25 staff on site and that the 8 new shift arrivals will need to park before 8 depart, the car park is already under capacity. Already it seems inherent with the application that some staff will need to park in neighbouring streets before existing staff have left work. Arguments over one or two staff taking the bus or cycling become beside the point. The majority will clearly drive and capacity is already tending to overflow.

Worse, nowhere in these figures is an estimate of visitors to the site. With 66 residents it is reasonable to assume that at least 5 may have visitors at any one time. Perhaps, if visiting times are prescribed, the number at those times will be very much greater. This pushes the car parking even further under-capacity and adds further very likely parking pressure onto surrounding streets.

Further still, no estimate is made of other professional visitors such as maintenance contractors, utility services, medical or personal care specialists, gardeners, etc, all likely arriving in a vehicle and not via public transport, adding still more pressure to available parking.

West Sussex County Council planning guidelines say that a development's parking must "protect surrounding communities" and it is clear that this development's significantly under-planned car parking and highly likely spill-over into surrounding streets certainly does not meet this requirement.

Even at face value the parking proposals within this application are woefully under capacity and probably need to be around double the current plan to ensure there is no impact on the surrounding community and obstruction to local traffic. It would therefore be highly irresponsible to the surrounding community to approve these plans on the current basis.

4. Public transport

The Transport Assessment document makes reference to various bus services available at stops in Middleton village. However, the information again misleads by omission.

The document does not mention that the walking route between the bus stop and proposed site involves walking along a sometimes narrow pavement, close to often fast-moving traffic, down a completely unlit road. From long experience I can tell you that due to total darkness, changing surface levels together with protruding foliage and other obstructions, it is almost impossible and certainly very risky to walk down that pavement in the dark without a torch.

Given for several months of the year it gets dark at 3-4pm and would be dark at the given morning shift-change time of 8:00am, stumbling down that road in pitch blackness from the bus stop will likely not be viewed as a credible choice by many staff or visitors.

In addition, various potholes present an extremely high potential for being splashed by vehicles driving through roadside puddles if it has been raining. It is not a pleasant or easy walking route.

The information in the assessment does at least confirm is that there are no bus services at all on a Sunday, so staff and visitors to the site will certainly have no public transport options on that day, likely to be one of the most popular day for visitors.

Guidelines state priority will be given to developments that encourage use of alternative transport. **This proposal's aspects relating to alternative transport options are extremely weak. The reality is that most staff and visitors will arrive by car** and the provisions in relation to this form of transport in relation to access and parking, as described above, are completely deficient.

5. Other claims

There are numerous other small ways throughout the developer's Transport Assessment document in which it does not represent reality.

For example, on page 13, the document states that Silver Birch Drive "was observed to be free from any defect, serious or otherwise ...". This is totally untrue and casts severe doubt onto all of the document's apparent 'observations'. It is hard to understand how the authors of this report could have conveniently missed a series of serious and growing potholes between the Yapton Road

roundabout and the proposed access road. In reality, Silver Birch Drive, at the point it would be busiest if this application were approved, is already badly damaged by existing levels of traffic and has, for some time now, been in need of repair.

On page 14, the document states again that Yapton Road southbound is "free from any defects, serious or otherwise." Again, simply not true. At numerous points along that road, particularly nearer to its mini-roundabout junction with Middleton Road, there are various significant roadside potholes that are especially threatening to pedestrians when it has been raining. This section also describes the width of the footway without mentioning how that width is intruded upon at various points by foliage, forcing pedestrians very close to traffic. Many times along that pathway between Silver Birch Drive and Middleton pedestrians must stop to check that a large vehicle with wide mirrors isn't approaching before moving around an overhanging tree/bush.

On page 24, a photograph (Figure 4-5) appearing to show a long footpath alongside the site is taken exactly where the footpath ends. Behind the camera is only grass verge. The document at least admits the pathway is often only present on one side of the road. At the point the picture is taken there is a footpath on the other side of the road, but this would necessitate crossing a road along which vehicles move relatively quickly and that is only patchily-lit when dark – a significant safety concern that is not addressed in the document.

Finally, it is clear that construction access to the site will require far more significant damage to a protected and rarely healthy Ash tree next to the access route than has been set out in documents supporting this application, which refer merely to removal of a low-growth lower bough. A number of other lower-hanging branches will also need to be removed to the extent that around half of this healthy, protected tree will in fact need to be destroyed. West Sussex County Council has recently highlighted the threat to our local environment of Ash Dieback disease, saying it has the potential to kill an astonishing 95% of Ash trees in Sussex over the next 10-20 years. **Every opportunity must therefore be taken to preserve, especially if already protected, those that have been professionally judged to be rarely healthy and may be resistant.** Yet this development, via the proposed access route, proposes severe damage to this tree that would be difficult for it to survive.

More broadly, while I understand that there is a general priority to increase care home capacity in this area, the exact purpose of this development needs to be clarified. I gather that its use is not intended as a general care home for those able to pay for such services, but as a very specialised end-of-life dementia care facility, for which the demand and accessibility must inherently be much lower and less local. In this respect its role as a service for the local community is far more limited than appears to be claimed. There are many other buildings and sites that appear regularly available for sale that could be converted/developed for care home use such that a general priority to increase care home capacity doesn't in any way mean that this particular development must proceed on this particular site regardless of the many other defects of the application.

I hope that this information will be useful towards the Council's deliberations on the application. **I would certainly strongly recommend that officers and councillors undertake a site visit to view the above problems for themselves.** Seeing at least the narrow access road down which this application plans to put 145 additional vehicle movements a day, including some large vehicles, will confirm the basic impracticalities of the plan.