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Bognor Regis
West Sussex
PO22 6SE

Ms. A. Gardner
Principle Planning Officer
Arun District Council Planning Dept.
Arun Civic Centre
Maltravers Roads
Littlehampton
West Sussex
BN17 5LF

10th January 2020

Dear Ms. Gardner

I am writing in response to comments made by consultants regarding the proposed development of a care home in Middleton-on-Sea on a site which currently has planning permission for 13 individual private dwellings, and is the subject of Planning Application M/80/19/PL.

Footprint estimates:

In his email of 12 December 2019 Mr Adrian Kearley makes reference to supplementary drawings of the existing plan for 13 houses and that of the proposed care home to support his statement “when including both built form and hardstanding the site coverage will increase moderately from 38.5% to 45.3%”. To support this statement, he made reference to two diagrams labelled 04.02 & 04.03.

I have checked the drawings provided using a professional PC-based planning tool, and broadly agree with the areas given for different surfaces on the drawings. However, with regards to the differences between the extant and proposed scheme the figure quoted in Mr. Kearley’s email does not paint a full picture. Indeed, I would argue the use of the term “moderately” is entirely inappropriate and appears to be an effort to underplay the true differences between the two schemes.

Firstly, it was interesting to note that on the care home drawing the patio areas outside the ground-floor rooms and the pathways to the east and north are not marked as hardstanding on the diagrams in spite of the fact that they will invariably be covered or paved with stone. These areas are marked in yellow on the attached diagram (see Attachment 1). This issue has now been addressed by Tim Spencer in his email dated 2 Jan 2020 in which he states that the amount of paved and surface area within the gardens for the care home is 730m², which includes spaces adjacent to the units as well as the walkways within the landscaping areas. However, these areas were not included in the figures displayed on Mr. Kearley’s diagrams, and it is now clear that for the care home the total building and hardstand area should have been 1737m² + 1095m² + 730m² = 3562m². This represents 57% of the total site area of 6246m² – much larger than the 45.3% stated on the diagram.

So, the true increase in hardstanding size between the two plans is from 38.5% to 57% of the total plot area which actually represents a relative **increase of 48%** - in other words, the **comparative increase in ground coverage will be extremely significant** and not simply “moderate”.

I contest that Mr. Spencer’s reference to hardstanding and patio areas for the extant housing scheme is spurious. It is entirely supposition and even if it were true I believe that the estimate of 20m² per house is excessive. Examination of diagram 04.3 (Attachment 2) shows that this would mean such patios would occupy about a third of each garden, and how many private residential dwellings have patios that do this, and are as large 4mx5m? Even if Mr. Spencer’s figures were entirely true the relative increase in hardstanding area between the plans would be 30%.

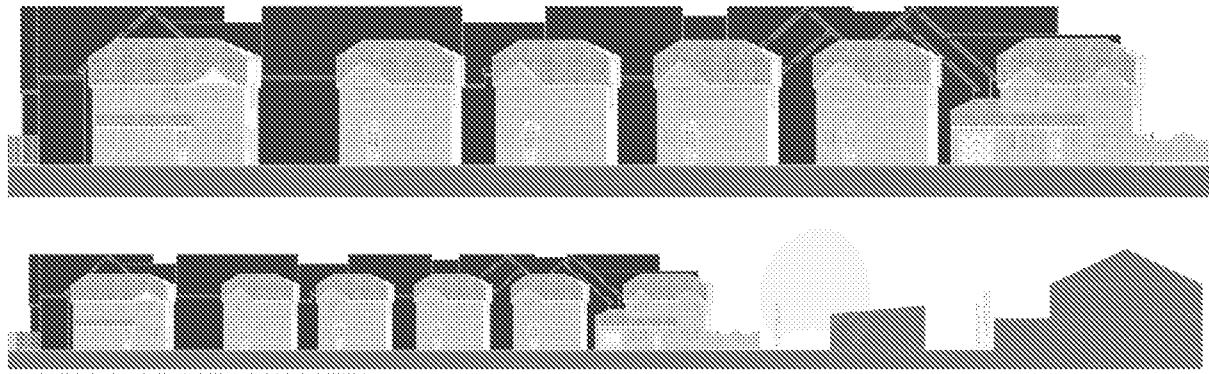
However, the total ground coverage alone does not tell the full story. To get a true impression of how the proposed development will impact the local area one must consider the “volume” of the structure, rather than its footprint. One only has to consider the skyscrapers in New York to know that this is true!

Volumetric estimates:

Using the figures from the drawings referred to in Mr. Kearley’s email we can see that, even without considering patios on the care home drawing, the **buildings’ footprints** alone (shown in pink on the diagrams) will change from 940m² to 1737m², which equates to an **increase of at least 85%!** Based upon the figures given by Frontier Estates on these and other planning documents, I estimate that the volume of the 13 houses currently allowed will be approximately 5,640m³, whilst **the proposed care home will be 10,830 m³, i.e. 92% more**; again, these figures are not what most people would term a “moderate” increase!

It is important to also consider that light and view can pass through gaps between 13 houses and their lower ridge-height garages, and at ground level this would engender a sense of space and freedom; this would not be true for a single building. Compared to the extant scheme the proposed care home will be truly monolithic! It will look out-of-proportion for the relatively small site on which it will sit, and in no way fits in with the environment of a small village.

The above statement is further supported by a diagram provided by Frontier Estates showing the care home against the existing houses on Silver Birch Drive. In the diagram provided the houses are shown in black, with the care home roof-line as a white line. Again, this appears to be an attempt to soften the size and true impact on light and space on the surroundings. A more graphic representation is given on the diagram below, which highlights the fact that the Care Home will not be opaque, but a very real object which will tower above the existing houses. Even the lowest part of the ridge-height of the proposed Care Home will be higher than any of those of the existing neighbouring residential properties.



Other related considerations:

I believe that it is telling that to justify the height of the proposed care home Frontier are making comparisons with the commercial buildings to the east (Duke's Motors). Most local people would agree that these buildings are unsuited to a small village, but they were here long before most of the current houses were built and, most importantly, they do not directly overshadow a row of existing residential houses. There are other fundamental differences too. Traffic to Duke's Motors and the other industrial units is during normal day-time working hours, unlike a large care home which, by its very nature, will attract and generate traffic 24/7. Moreover, in his report of 24 October 2019 Mr. Neville Wren of the West Sussex Police states that, to conform with security recommendations, the care home will require dusk-to-dawn LED lighting for each dwelling elevation with an external door, car parking areas, and footpaths leading to dwellings. This is not the case for the industrial estate. He also recommends a secure fence of at least 1.8m height around the site with gated access. The requirement for the latter will invariably lead to vehicles sitting, engines running, in a residential area, whilst entry to the site is sought by intercom or card-swipe. None of these restrictions apply to the industrial buildings that Frontier Estates are choosing for comparison. It is clear that with its massive size, a high surrounding fence and constant high-level lighting throughout the hours of darkness, the care home will have the appearance akin to a prison or military barracks. Again, not a sight that befits a village residential environment!

So, are we to take Frontier's comparison as an expectation that it is OK to build similarly sized structures in any location in the village?

The direct comparison with the commercial buildings also raises another interesting point. The extant plan is for a residential development however, the new plan is for a commercial building. So, not only does this planning application therefore represent a change of structure, it also represents a fundamental change of use. Houses will be residential dwellings throughout their existence, but a massive commercial building with 66 bedrooms and communal areas can be put to many different uses if the original plan becomes commercially unviable; hotel, college, rehabilitation centre etc.

The label "care home" carries an emotive tone that is bound to garner support within a caring society. However, in reality this will be a ruthless commercial business; and it is inevitable that if the business model fails to produce the required revenue, the building will be used for other commercial purposes. Local care homes are closing because they can't be filled – so, the indications are that this one, with weekly rates that are way out the reach of most residents of the village, will fare no better and that its purpose will, in all likelihood, be changed.

One has to wonder whether an application for a commercial building of this size would be supported enthusiastically by West Sussex and Arun District Councils had it been for car maintenance and refurbishment, as currently carried out at Duke's Motors. It is unlikely that even a hotel would have been approved, and yet the proposed building could swiftly be converted for many other uses.

Overall, the evidence above indicates that, whilst Frontier Estates are not falsifying figures their (at best down-played and at worst deceptive) representations attempt to conceal the massive scale and commercial potential of their proposal.

Parking & vehicular access:

Turning to another point raised in Mr. Kearley's email, I would challenge the statements made regarding the parking demands of the proposed home.

It is interesting to compare the area of ground space allocated for the use of vehicular and pedestrian traffic between the extant plan for 13 houses and the proposed care home. The former is 1462m², the latter 1095m². In other words, a drop of 25% of available space to handle the considerable traffic needs of a 66-bed care home. Furthermore, Frontier's figures fail to acknowledge that the figure given for the houses does not include the area provided by their garages which, by definition, are designed for vehicle parking, and should provide extra parking space for 9 vehicles. The care home has no garage parking so, in actual fact, the percentage reduction in available space for vehicular traffic and parking at the care home is even greater than indicated by the figure above.

It is proposed that the Care Home will have 29 parking spaces including two disabled and six with electric charging points. Many local residents have raised concerns about the adequacy of these spaces to meet the needs of a 66-bed care home, and the potential that spill-over traffic will park on local roads. By its very nature it is inevitable that additional commercial, medical, waste disposal and hearse traffic will need to enter the care home and traverse the parking area for their operations. However, one must also consider that this care home is not solely for residents with dementia, and that it is eminently plausible that some residents will own cars that will require parking. Minibuses to transport residents can be expected to be on site, together with cars driven by outside support personnel such as medical staff, cleaners, maintenance personnel, caterers, hairdressers, manicurists, therapists and entertainers; all of which I know from recent personal family experience will be regular callers at an up-market care home. Furthermore, it is absolutely certain that a home housing 66 elderly patients will attract a considerable number of visitors, particularly at weekends and during holiday periods.

Against this background we should consider Mr. Kearsley's comments about traffic generated by staff. In his analysis he states that a maximum of 20 staff will be on site at any one time, of which 50% will travel by car. Given the lack of public transport in the area I consider this to be a significant under-estimate, however, his analysis is based on 25 staff to "ensure a robust approach". In other words, each shift will comprise up to 25 personnel, 12 or 13 of whom will drive to work. This looks good on paper, but he fails to consider the fact that staff do not suddenly appear and disappear. The very nature of a care home means that staff will need to handover, and that during the handover periods a total of 40 to 50 personnel will be at the site along with their 20 to 25 cars.

Some "realistic" thought needs to be applied here. Firstly, given that residents, visitors and medical staffs will be looking to use some of the 27 available spaces, what are the chances of an extra 20 to 25 cars being able to park on site? A counter argument to this might be that once the off-going shift leave, the on-coming shift personnel will go out and move their cars from surrounding streets into the vacated slots. I consider that this is very unlikely to happen; firstly, it would mean that staff will have to leave their work stations or wait for a break and secondly, human nature being what it is, such action will likely fall into the "too difficult" category, particularly as it will mean exiting and re-entering the gated area.

So, using Frontier's own figures, to effect a full shift handover without forcing off-site parking will require there to be 25 free parking places at each change. With a total of 29 places to meet ALL parking demands described above I submit that this will simply not be the case.

Once again, I believe that apparently low figures are being quoted to hide the true nature of the issue.

Finally, it is again worth stressing that under the current application all the extra vehicular traffic generated by the care home is expected to drive through an established and quiet residential road, and enter the site via a cul de sac historically used for parking. This will cause ever-lasting and inestimable distress to all existing residents, and very probably result in the destruction of healthy protected Ash and Maple trees.

It will also curtail the use and enjoyment of the ancient public footpath that needs to be crossed by all traffic entering and leaving the care home site.

Flood risk:

My next point concerns an email dated 9 December 2019 from Sarah Burrow, an Engineering Assistant, responding to a request from Mrs Anita Gardner for comments on the presence of the Dew Pond to the north of the Care Home site. In her email Sarah Burrow simply states that “the site is not an EA Flood Zone”. As was made clear in the WSCC Flood Authority’s assessment dated 10th October 2019 the flood risk has been assessed on “modelled data only”, a method that is reconfirmed by the fact that this engineer’s statement is based upon a simple analysis of a Flood Zone plot, rather than actual data.

I attach to this letter a recent aerial photograph of the area just to the north of the site which clearly shows that the area is (frequently) prone to extensive flooding (Attachment 3).

Furthermore, it is to be noted from Frontier’s site drawing (Attachment 4) that surface water from the care home and surrounding hard-standing is planned to drain into ditches to the south of the site. Again, a visit to the site over recent weeks would have revealed that these ditches soon fill to bursting point, and then overflow.

I therefore contest that the engineering analysis of flood potential is purely hypothetical, rather than based on real-world observations. In reality there is a genuine high risk that the care home’s large ground footprint will result in significantly reduced ground absorption and considerable extra surface water run-off into ditches and onto land that is already struggling to cope.

Underhand action by Frontier Estates:

So far, the evidence presented in this letter has highlighted instances where Frontier Estates have, at best, been economical with the truth in their representations, and play down the true size of the development by quoting the smallest figures to support their case.

However, what is also apparent is that their tactics to garner support for their plan from the public has been totally scurrilous and underhand. Through the use of door-knocking “research” teams they have collected and submitted a number of “one-line” forms purporting to be in favour of it (Examples at Attachment 5). These are desperation tactics in face of the massive number of objections that were raised by local residents to the scheme and were submitted by the stipulated due date of 24 October 2019. The one-line messages submitted by Frontier have been obtained from people who live at a distance from the site and who will certainly not be directly affected by its presence. It is a huge insult to the local council and the many local residents, who submitted extensive and rational arguments against the care home, to think that these feeble one or two-line entries cajoled on the doorstep could be given equal weight and have been displayed individually on the ADC planning website. By contrast many residents’ submissions were grouped under a single entry.

Summary:

In summary, when compared to the extant plan for 13 residential dwellings the proposed care home plan will comprise 48% more hardstanding, at least 85% greater building footprint and an increase of 92% in volume. Moreover, the area designated for traffic and parking will reduce by 25%.

This development will be a massive structure that is not only too big for the size of plot, but will be totally out-of-keeping at the entrance to a small village. Frontier Estates have submitted figures that downplay the size and impact of the building, and are resorting to underhand tactics in an attempt to display public support for the scheme.

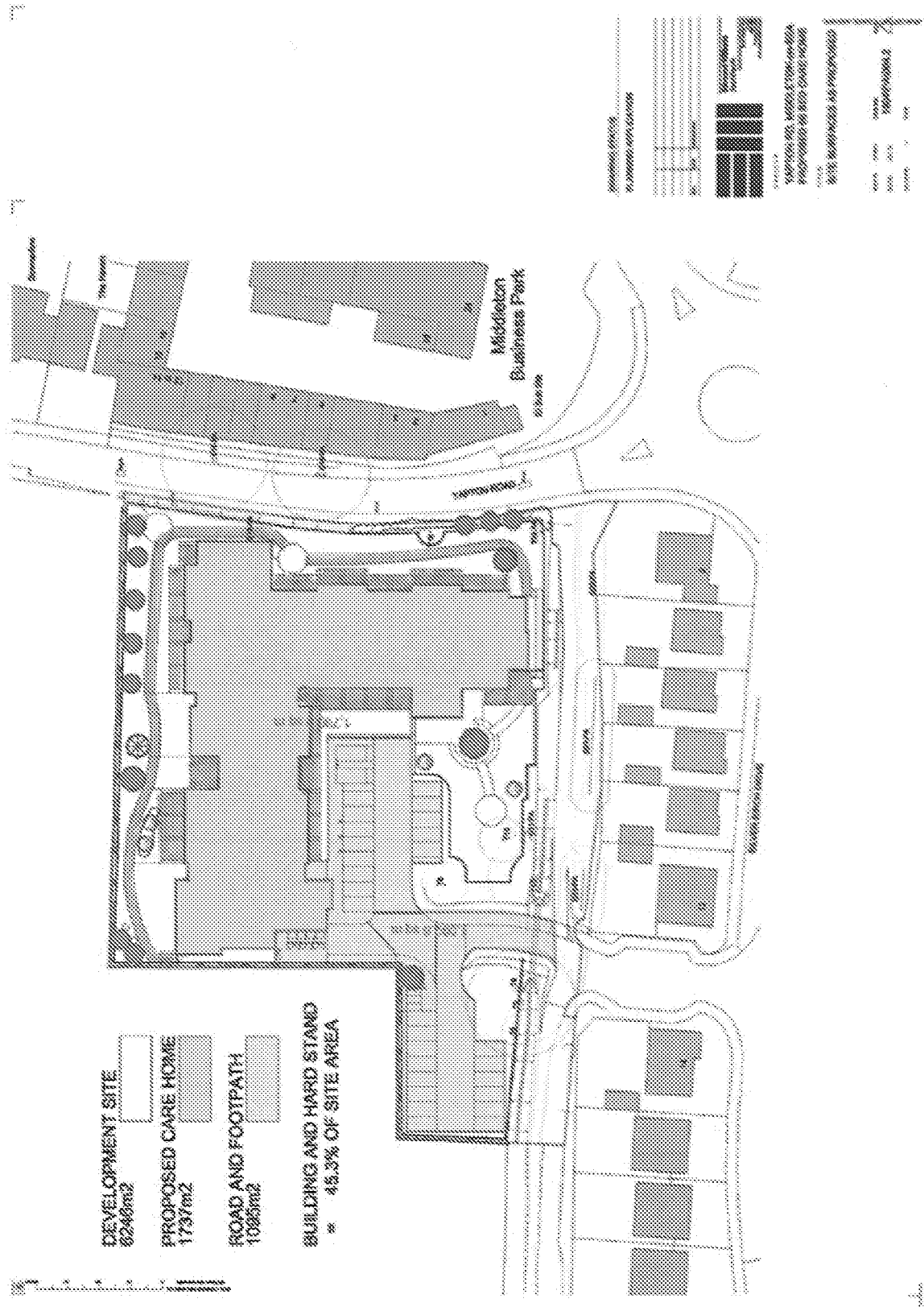
We can only hope and pray that the members of the Planning Committee will see through Frontier Estates' ruse to hide the hugely negative impact that their plan will have on the lives and well-being of the local community and environment.

Please register this letter as an objection to the planning proposal.

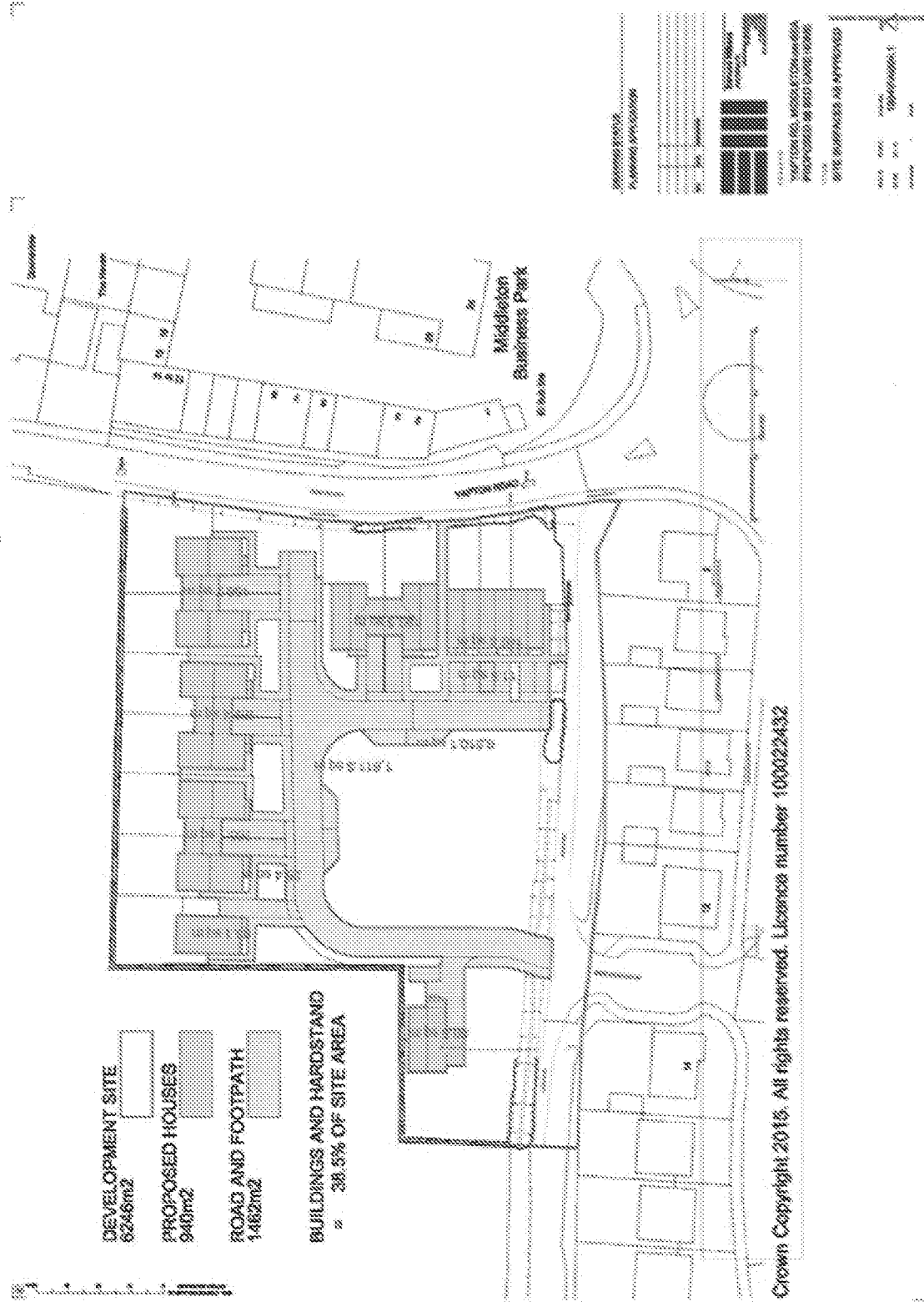
Yours sincerely,

Timothy Kerss MBE
Wing Commander (retired)

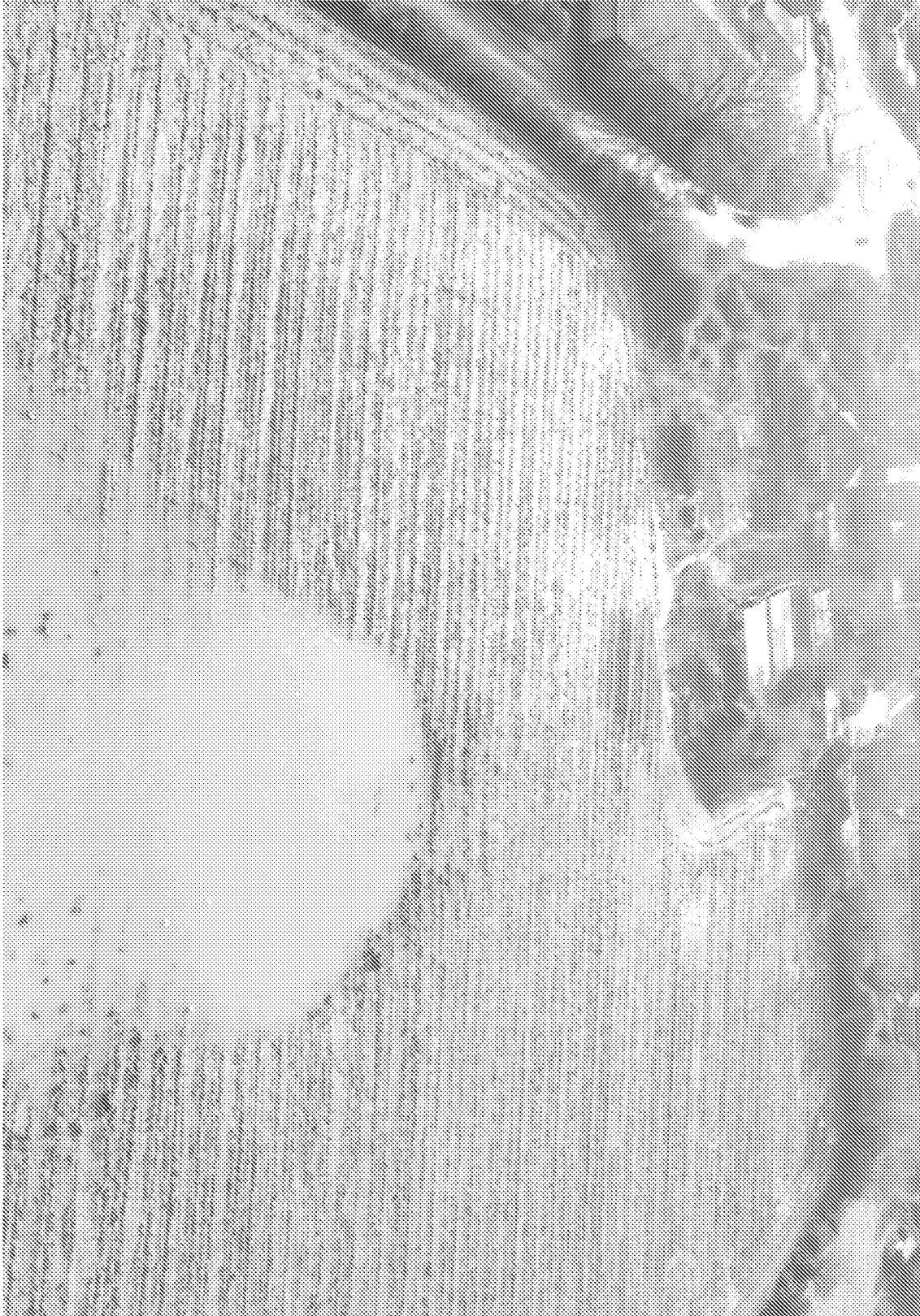
Attachment 1: Proposed care home site diagram



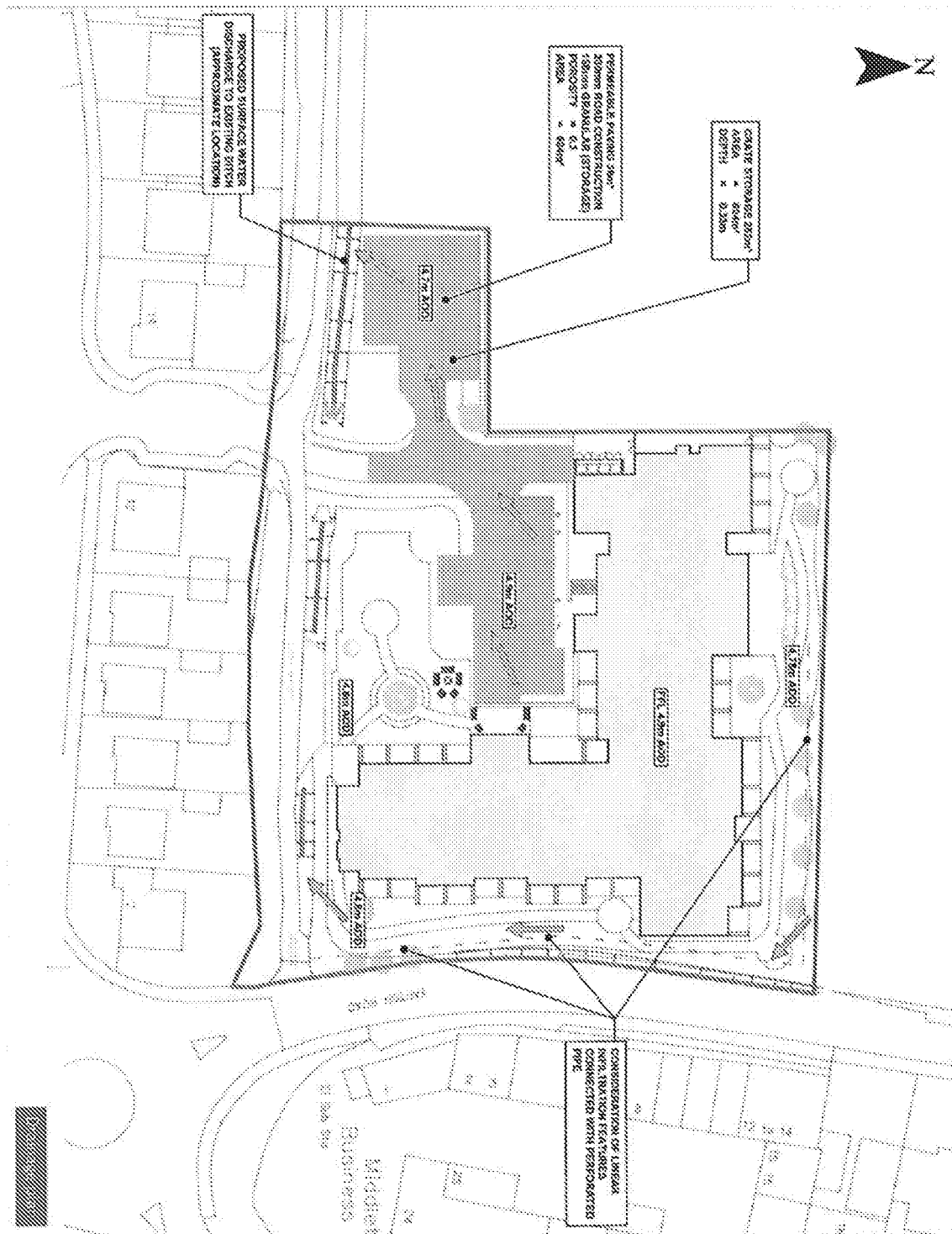
Attachment 2: Extant plan for 13 residential dwellings



Attachment 3: Recent photo showing flooding at development site



Attachment 4: Proposed site drainage plan



Attachment 5: Examples of comment cards submitted by Frontier Estates in support of their plan

Application Number: M/80/19/PL

Site: Land West of Yapton Road (former Poultry Farm), Middleton-on-Sea

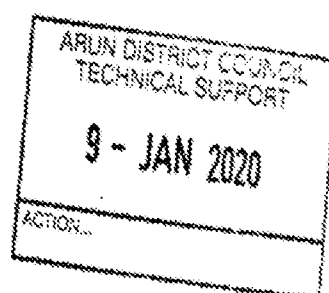
Name: Mr & Mrs Fry

Address: 6 LEAMAN CLOSE

Postcode: PO22 6HL

Comment:

HAVE NO ISSUES.



Application Number: M/80/19/PL

Site: Land West of Yapton Road (former Poultry Farm), Middleton-on-Sea

Name: NICHOLA LEE

Address: 14 COOTES LANE, MIDDLETON

Postcode: PO22 6HY

Comment: Great idea needed in this area.

