

From: Cllr. June Hamilton
Sent: 03 February 2020 20:50
To: Cllr. Tony Dixon; Councillors - Development Control Committee
Cc: Neil Crowther
Subject: Re: Application M/80/19/PL Care Home at former Poultry Farm

I am in total agreement.

From: Cllr. Tony Dixon [REDACTED]
Sent: Sunday, February 2, 2020 7:55:47 PM
To: Councillors - Development Control Committee [REDACTED]
Cc: Neil Crowther <Neil.Crowther@arun.gov.uk>
Subject: Re: Application M/80/19/PL Care Home at former Poultry Farm

Dear members of Development Control

I am a working councillor and will be unable to attend Development Control on Wednesday 4th February to speak. Therefore, would you please consider this written submission.

I am concerned that Arun may not be examining the above application carefully enough, particularly as over 150 local residents have taken the trouble to communicate their views to us.

There is a recommendation to approve, but the application fails to comply with a number of our Local Plan Policies, and it is incumbent upon us to look at these carefully.

Non compliance with Local Plan Policies is a Material Consideration and will provide an effective defence if the matter should go to appeal. And it should be noted that an Inspector is very unlikely to award costs against us for a defence based on these Policies.

In the context of this, please note the following which are not made sufficiently clear in your agenda, which claims that this proposal is not 'over development'. In comparison with the extant planning consent, the changes are as follows:

- 85% increase in footprint - accepted in your agenda
- 60% increase in beds per hectare - numbers incorrect in your agenda
- 48% increase in hard standing
- 23% increase in ridge height - over existing and extant permission
- 92% increase in volume of buildings, from 5,640 cu.m to 10,830 cu.m
- 70% increase in daily vehicle usage over extant planning permission, and 100% increase over present use.

Scale, massing and density are defined in our Local Plan under 13.2.2/13.2.8/13.2.9/13.2.11/13.2.12 and the proposal fails under these - which is strong evidence of over development.

Please also note 13.2.6 Sustainable Development Objectives. This proposal does not: "respect, improve and enhance the existing surrounding environment" as is required.

The Local Plan Policies that are not complied with are as follows:

Policy SD SP1. Sustainable Development. Does not comply because it requires the development to contribute to the "social, economic and environmental conditions south of the National Park." This development does nothing for this, particularly environmental.

Policy H DM2. Care Homes. Does not comply under "b) shall be easily accessible...by...public transport" The 600 bus does not stop nearby, the nearest stop is a long uncomfortable walk away on a narrow unlit footpath along Yapton Road alongside busy traffic. The Service does not run after 9.10 pm and not at all on Sundays. Your agenda report (P16) is incorrect, there is no easy access to the 700 bus. It is either a very long unlit walk and the crossing of the A259, or a very long walk to Flansham Park.

Also does not comply under "d) the...scale of the scheme shall be appropriate to the local context." Please note the increases in scale mentioned above.

Policy D SP1 Design. Does not comply under: "should reflect the characteristics of the site and local area in density, scale or massing." There is also no evidence of the required "context appraisal".

Policy D DM1.Design Quality. Does not comply under:

1. Character. This scheme is not: "...reflecting or improving upon the character of the site and the surrounding area in terms of scale, massing...density."

3. Impact. This scheme does not: "have minimal impact to users and occupiers of nearby property and land."

13. Density. This scheme does not "...take into account the density of the site and its surroundings."

For evidence on all of these please see increases in scale etc listed above and the comments in writing from some 150 local residents.

Policy T SP1 Transport. Does not comply because the scheme does not:

"reduce congestion" -- it increases it!

"promote sustainable transport" -- nothing is proposed

"promote public transport improvements" -- nothing is contributed

"reduce the need to travel by car" -- it increases it

"improve access to public transport services" -- nothing is proposed

provide "improvements to the existing road network" – nothing is proposed

PLUS: this scheme does nothing to "reduce the need to travel". - it increases it.

Policy ENV DM4 Protection of trees. Does not comply as there is no definite assurance that protected onsite tree T4 "will not be damaged or destroyed" as required under the policy.

under c.) the benefits of the scheme would have to outweigh the loss of the tree to allow this. This is a 'weight' judgement for the Committee, but the scheme's benefits can be achieved elsewhere -the tree's benefits cannot.

The tree in question is a magnificent Ash tree with a TPO, healthy, very publicly visible and much enjoyed locally. WSCC says we should be preserving Ash trees which are endangered, yet our tree officer has allowed for the possibility that the developers may destroy it. We can prevent this destruction by refusing this application.

Policy QE SP1. Quality of the Environment. "The Council requires that all development contributes positively to the quality of the environment" -- this development does nothing for this.

The Policy also requires that any development: "will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment" – this development's scale, massing, 145 vehicles a day, danger to TPO tree are all factors causing 150+ people to write and object.

Policy QE DM2 Light pollution. Will not comply as Police have demanded dusk to dawn high level lighting so will contravene a) "No adverse impact on neighbouring uses or the wider landscape" Adjacent residents will suffer from this (streetlights go off at midnight) and also wildlife such as bats/owls currently on site will be driven away.

Policy INF SP1 Infrastructure. "Offsite measures will require planning obligations or financial contributions". There is no contribution to already overstretched local doctors/dentists/medical support, all of which will have added workload. No contribution to Middleton facilities. The only Section 106 money is for Bognor Library which will not be affected at all.

Policy ENV DM5 Biodiversity. "Development schemes shall...seek to achieve a net gain in biodiversity" This application does not do this and the required dawn to dusk high level lighting required by the Police will adversely affect bats, owls and other wildlife already existing on the site.

You may also wish to note that the application may be refused over non-compliance with NPPF para 109 where development may be refused if there would be: "unacceptable impact on highway safety". The effect of this on the Arun Chase roundabout very close at hand is that it will increase traffic there by 16% (145 vehicles per day) and thereby provide a 16% increase in the risk factor there.

The exit from Silver Birch Drive onto this roundabout is effectively blind to the right, vehicles arrive there from the south at the speed limit and above, and it has been measured that at 30mph there is just 2.5 seconds from coming into view and impact. There have been many near misses there, and on one occasion a car ended up on the roundabout on its roof.

None of this has been addressed in the Road Safety Audit which does not mention the roundabout at all, which many consider to be negligent. This development will only make this situation worse.

This development may also be refused under NPPF para 127(c) which requires that developments should be: "sympathetic to local character, including the surrounding built environment..." This development is not sympathetic. Your agenda report suggests that the size and bulk of the Dukes Motors building justifies the size and bulk of this proposal. However, that building is not visible from residential property on Silver Birch Drive, whereas this proposal will be. Nor is that building even visible from Yapton Road on the approach to the village, whereas the proposal will be. And in any case, that building would not be permitted in this semi-rural/residential location nowadays, so to justify more of the same on that basis is a slippery slope leading to ever more unsuitable buildings.

Lastly, viability and need. The applicants and your agenda report seeks to show that there is/will be a shortage of care home and dementia care beds, and therefore that this application will be fulfilling a significant demand. This is not true.

The applicants' consultants' report shows that there are 16 homes within 2.9 miles, 10 offering dementia care. Another has just been approved in Climping, with 64 beds. The applicants themselves are building another in Chichester with 75 beds. All will be modern and purpose built. There are plans for another home in Barnham with 60+ beds, and for another at Ford.

In addition, local research reveals that there are still a large number of vacant beds available, backing up a member of the public's research showing that Walberton Place had 56 vacant beds last October.

The consultants' report also says; "An adequate number of registered beds exists across the target area" and also that: "statistical supply/demand parity exists." And that comment does not take into account the recent Climping permission for an extra 64 beds. They also say that UK wide there are 465,000 beds accommodating 420,000 clients, and that the average length of occupancy is 24 months - so no bed-blocking.

Local research has also revealed that a major challenge for these homes is recruitment, and that they cannot function if they cannot recruit the staff, as is the position at the moment. So your agenda report re employment prospects is scarcely valid.

The end result of all this is that local demand is currently well supplied and that there is no pressing need for this care home on the grounds of local requirements. Also that recruitment challenges may mean that it will not be able to function properly anyway. This opens the possibility that if it is built we will soon be faced with an application for a change of use on the grounds of non-viability. In the light of that it would be sensible to request an independent viability assessment now, in order to fully establish the truth of the situation.

My apologies for going on so long, but this is important. All the factors suggest that this application should be refused, and you have the grounds to do this and defend any subsequent appeal via non-compliance with Local Plan Policies. I would respectfully ask you to refuse this application.

Thank you for considering these points.

Yours sincerely

Tony Dixon