



# Public Document Pack

Arun District Council  
Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex  
BN17 5LF

Tel: (01903 737500)  
Fax: (01903) 730442  
DX: 57406 Littlehampton  
Minicom: 01903 732765

e-mail: committees@arun.gov.uk

Committee Manager Carrie O'Connor (Ext 37614)

5 December 2019

## **PLANNING POLICY SUB-COMMITTEE**

A meeting of the Planning Policy Sub-Committee will be held in **at Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF on Tuesday 17 December 2019 at 6.00 pm** and you are requested to attend.

Members: Councillors Mrs Yeates (Chairman), Jones (Vice-Chair), Bower, Charles, Mrs Daniells, Dixon, Elkins, Huntley, Lury, Northeast, Oppler, Mrs Pendleton, Ms Thurston, Dr Walsh and Mrs Worne

## **AGENDA**

### **1. APOLOGIES FOR ABSENCE**

### **2. DECLARATIONS OF INTEREST**

Members and Officers are reminded to make any declarations of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda and are reminded that they should re-declare their interest before consideration of the item or as soon as the interest becomes apparent.

Members and officers should make their declaration by stating :

- a) the item they have the interest in
- b) whether it is a pecuniary, personal and/or prejudicial
- c) the nature of the interest

### **3. MINUTES**

(Pages 1 - 8)

To agree as a correct record the Minutes of the meeting held on 15 October 2019 (attached).

4. **ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES**

5. **LOCAL PLAN OPTIONS**

(Pages 9 - 18)

All Councils are under a statutory obligation to prepare a Local Plan, and the National Planning Policy Framework (NPPF) requires Councils to review Local Plan policies every five years. Para 12.1.12 of the existing Arun Local Plan indicates that if our housing delivery is below the required levels for two consecutive years, the Council will initiate a partial review of the Plan (in order to increase provision). There is therefore now a requirement to commence work on a review of some of the Local Plan and this report explores the options available to the Council.

6. **ARUN DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

(Pages 19 - 26)

This report updates members on the preparation of the Arun Design Guide Supplementary Planning Document (Design Guide SPD) – which will be subject to a four-week consultation in the spring 2020 and then subsequent adoption by Full Council. The Design Guidance provides more detailed guidance on the application of design policies within the adopted Arun Local Plan 2018 and will be used as a material consideration for the determination of planning applications and will be a vital planning tool for shaping new development in line with the policies set out in the Local Plan.

7. **OPEN SPACE, PLAYING PITCHES AND BUILT SPORTS FACILITIES SUPPLEMENTARY PLANNING DOCUMENT (SPD) AND ARUN PARKING STANDARDS SPD**

(Pages 27 - 32)

Following a four-week Regulation 12 Public participation' period (The Town and Country Planning (Local Planning) (England) Regulations 2012), a limited number of comments were received on the two proposed Supplementary Planning Documents (SPDs): Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document (SPD); and Arun Parking Standards SPD which the Sub-Committee had recommended at its last meeting of 15 October 2019 should be referred to Full Council for adoption on 15 January 2020. The comments raised on the respective SPDs do not raise material objections or issues but request a limited number of clarifications which it is considered will helpfully improve the interpretation of the SPDs. The changes can be made under delegated authority and the SPDs can accordingly be referred to Full Council for adoption.

8. **GYPSY & TRAVELLER & TRAVELLING SHOWMEN SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)** (Pages 33 - 70)

This report advises members on the outcome of the Gypsy & Traveller and Traveller Showmen (G&T) Site Allocations Issues and Options public consultation, undertaken in summer 2019 which included 9 existing sites for intensification to meet needs with a further new site option to be considered for allocation. The report summarises representations made and the Council's proposed response and sets out the next steps for preparing the G&T Site Allocations Development Plan Document.

9. **COMMUNITY INFRASTRUCTURE LEVY (CIL) UPDATE**

This report provides an update on the Arun CIL Examination which took place on 18 October 2019. It also provides a summary of the Examiner's Report, which is due to be issued to the Council during the week commencing 2 December 2019 and, as a result, it will be provided under separate cover to enable the Examiner's recommendations to be taken account of.

The Examiner's report may include specified modifications to the Charging Schedule that are required to be made to the Charging Schedule. A list of these modifications, and the reasons for them will be reported to the Sub-Committee. The final Charging Schedule and a schedule of the recommended modifications will be appended to the report.

The report will also include further details regarding the CIL charging process such as "Bringing CIL into Effect" and a "Next Steps" section which will explain the tasks that are required to implement and govern the CIL processes.

Finally, the report will ask the Subcommittee to recommend to Full Council that the Arun CIL Charging Schedule be approved to come into effect on 1 April 2020.

Note : Reports are attached for all Members of the Sub-Committee only and the press (excluding exempt items). Copies of reports can be obtained on request from the Committee Manager.

Note : Members are reminded that if they have any detailed questions would they please inform the Chairman and/or relevant Director in advance of the meeting.

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## PLANNING POLICY SUB-COMMITTEE

15 October 2019 at 6.00 pm

Present: Councillors Mrs Yeates (Chairman), Jones (Vice-Chair), Bower, Chapman (substituting for Councillor Elkins), Dixon, Huntley, Lury, Mrs Pendleton, Ms Thurston and Mrs Worne

### 9. APOLOGIES FOR ABSENCE

Apologies for Absence had been received from Councillors Mrs Daniells, Elkins, Northeast and Oppler.

### 10. DECLARATIONS OF INTEREST

There were no declarations made.

### 11. MINUTES

The Minutes of the meeting held on 18 June 2019 were approved by the Subcommittee and signed by the Chairman as a correct record.

### 12. PLANNING POLICY & CLIMATE CHANGE EMERGENCY

At the meeting of Full Council on 17 July 2019, the following Motion was agreed which the Planning Policy Subcommittee was requested to consider:-

“This Council supports the principle of developing supplementary planning guidance to improve the level of sustainability of all developments in comparison to the current position.

Officers are asked to prepare a report for the consideration of the Planning Policy Sub Committee on how this might be achieved including reference to the following, and the likely costs and benefits thereof.

- 1) Guidance on renewable energy (both passive & active) for individual homes.
- 2) Improved standards for insulation, heat recovery and water usage.
- 3) Guidance for community renewable energy schemes.
- 4) Guidance on designs for waste/recycling storage facilities.
- 5) Guidance on the planting of woodland which can be both a mitigating and resilience action in terms of carbon sequestration and reducing the rate of surface water run - off and thereby reducing the flooding impact of severe rainfall.
- 6) Improved and more rigorous standards for the prevention of flooding.

The Sub Committee is also asked to make recommendations as to whether Arun DC should look at declaring a Climate Change Emergency and the implications of creating a framework for moving towards a Carbon Neutral District and whether the Council should consider engaging the services of an energy agency to provide community retrofit advice and support and explore the potential retrofitting of solar panels on all appropriate Council assets.”

In presenting the report, the Planning Policy Team Leader advised that the Director of Services would also be presenting a complementary report to the Environment & Leisure Working Group at its meeting on 7 November 2019 which would

- Scope out the feasibility of, and make recommendation on, setting an appropriate zero-carbon target for Arun District by 2030; and
- Identify the corporate service and other joint stakeholder initiatives and actions needed outside of but complementary to the planning system supported by a consultancy budget.

The Subcommittee participated in a comprehensive debate on the matter which, in summary, encompassed the following issues: -

- Policy E CC SP2 Energy and Climate Change Mitigation – a question was asked with regard to what was decentralised energy and a response was given by the Planning Policy Team Leader that it was, in essence, stand alone schemes, e.g. a factory powered independently of the national electricity grid or could be powered by private wire from a biomass scheme generating energy. It was suggested that other options to be looked at could be combined heat and power plants and centralised energy. In addition, energy sources near to where people lived should not be overlooked.
- The Planning Policy Team Leader advised that through the Future Homes Standards, the Government had already launched a better energy performance target and the building regulations regime was being changed. The building industry needed to be pushed forward collectively. However, the downside of Government intervention was that it would restrict the ability of local authorities to set their own standards.
- Concern was expressed that the construction industry’s reaction to the changes in standards could have a negative and detrimental impact on the District’s housing targets which had been set and must be delivered. A Member response was made that it was important to work with developers as it was felt that they were keen to do the right thing as everyone wanted to get climate change under control.
- It was acknowledged that there were ethical developers working within the industry who were working on greater resilience housing and that, in due course, would become the norm. It was suggested and agreed by Members that a good start could be with the Council taking the lead when building up their own stock of new Council houses in the future (Members were reminded that that was in fact outside the purview of the Subcommittee).
- Comment was made around the viability of development in the future to ensure it was environmentally friendly as it was recognised that there was a fine balance

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because houses were needed in the District. In addition, developments had to be viable to ensure that infrastructure could be provided.

In the course of the debate it was acknowledged that this was a good report, but a concern was expressed that a number of other authorities were doing the same work and so a strategic approach should be taken to undertake studies and research to share costs. It was suggested that the Coastal West Sussex Strategic Planning Board should be involved as, in the past, that had provided cost effective and better quality responses to issues at a sub-regional level.

There was a general view from Members that time was of the essence and that there was a need to act urgently so, yes, a climate emergency should be declared.

The Group Head of Planning cautioned Members that what was before them was, at this stage, a scoping report and a route would have to be followed to implement changes.

Following debate, the Subcommittee

RECOMMEND TO FULL COUNCIL ON 13 NOVEMBER 2019 – That

- (1) A climate emergency be agreed by the Environment & Leisure Working Group and declared by the Council;
- (2) Should a climate emergency be declared, officers to investigate the scope of evidence necessary to test the feasibility and viability of achieving higher standards of sustainable design and adopting a zero-carbon target by 2030 where achievable; and
- (3) Following consideration of this evidence and testing, officers to prepare a review of the development management policies in the Local Plan or a Supplementary Planning Document.

13. PROVISION OF ACCOMMODATION SUITABLE FOR OLDER PEOPLE AND PEOPLE WITH DISABILITIES

The Planning Policy Team Leader presented this report which considered the representations made following a four week consultation on the Council's proposed draft guidance for the provision of Accommodation for Older People and People with Disability. Recommendations were proposed to enable adoption of the guidance as a material consideration for Development Management purposes and an amended recommendation was circulated at the meeting to recommend to Full Council for approval at its meeting on 13 November 2019.

The Subcommittee was directed to Section 1 of the report which summarised and addressed the issues raised by Barton Wilmore and the Home Builders Federation. A clear need for this guidance had been included in the Local Plan evidence base and

there was also a recognition that there had been a policy change at national level – National Planning Policy Framework (NPPF) had changed and that was a material consideration. The proposed guidance should clarify its status as guidance but not a Supplementary Planning Document (SPD). It would be used as a starting point to negotiate with developers, subject to viability, the types of housing and accessibility levels (based on the Optional Technical Standards) that should be considered to meet the needs of the elderly population, just as the mix and tenure of housing (e.g. adopted Policy H DM1 Housing Mix) would be negotiated on a case by case basis at application stage, taking into account viability.

Members supported the need for the guidance, and it was suggested that it be included in the Local Plan review in the future for consideration as a Supplementary Planning Document (SDP).

In the course of general discussion on the matter, Members supported the principle of the guidance and saw it as a starting point and, whilst mindful of the viability and feasibility issues, felt that there should be built in better design standards for wheelchair accessibility. There needed to be liaison on the Design Guide to ensure that best practice for provision for wheelchair use was addressed for smaller schemes (below 11 units). It was suggested that putting electrical sockets at wheelchair accessible height could actually save costs and dovetail with measures to increase flood resilience. This was just one example of good practice which could actually assist with viability. Comment was also made that bungalows should be supported for larger schemes.

Members were advised that the Design Guide would be considered in detail at a future meeting of the Subcommittee.

The Subcommittee

RECOMMEND TO FULL COUNCIL ON 13 NOVEMBER 2019 – That

- (1) The proposed guidance for the provision of Accommodation Suitable for Older Persons and People with Disabilities is treated as a guide (i.e. not as Supplementary Planning Document) to provide a material consideration in respect of the determination of all relevant planning applications: and
- (2) The proposed guidance is clearly set out as a starting point to inform development management negotiations, does not impose rigid requirements and is subject to viability.

#### 14. OPEN SPACE PLAYING PITCHES AND BUILT SPORTS FACILITIES SPD

The Subcommittee received a report from the Planning Policy Team Leader which informed Members of representations made and proposed responses following a four week consultation on a draft Supplementary Planning Document (SPD) for Open Space, Playing Pitches and Built Sports Facilities. A recommendation to Full Council



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on 15 January 2020 sought adoption of the SPD as a material consideration for Development Management purposes.

In presenting the report, the Planning Policy Team Leader highlighted paragraph 1.10 and confirmed that it was proposed that the SPD should be adopted but that clarification would need to be added regarding the Fields In Trust (FIT) standard quanta and ancillary facilities within the Sport England calculator which would be maintained as a material consideration but, subject to viability and feasibility. This was due to the untested additional cost implication which had not been specifically viability tested or examined through the Local Plan.

Following Member comment relating to the Butlins LDO (Local Development Order) and S106 contributions, the Subcommittee

#### RECOMMEND TO FULL COUNCIL ON 15 JANUARY 2020

That, following publication of the Supplementary Planning Document for 4 weeks, together with the statement of representations and Arun's proposed response, and subject to the proposed changes detailed in the report and any further minor changes made by the Group Head of Planning in consultation with the Chairman and Portfolio Holder for Planning, the Open Space, Playing Pitches and Built Sports Facilities SPD be adopted.

#### 15. PARKING STANDARDS SUPPLEMENTARY PLANNING DOCUMENT

The Subcommittee received a report from the Planning Policy Team Leader which informed Members of representations made and proposed responses following a four week consultation on a draft Supplementary Planning Document (SPD) for Parking Standards. A recommendation to Full Council on 15 January 2020 sought adoption of the SPD as a material consideration for Development Management purposes.

In presenting the report, the Planning Policy Team Leader highlighted that this SPD was broadly consistent with West Sussex County Council's published "Guidance on Parking at New Developments 2019" but that it did make several departures to reflect the Arun position, local circumstances, e.g. incorporating electrical vehicle charging points in line with Arun's evidence based approach (i.e. Arun Electrical Vehicle Infrastructure Study November 2017), and to increase the usability of the document.

In discussing the matter, the Group Head of Planning gave advice on the definition of a parking space as a query was raised as to how a garage would only count at 0.5 of a space compared to 1.0 space for a car port or parking space. It was explained that that was meant to apply to larger schemes and to only count as 0.5 in such instances against the parking standard required by proposed overall dwelling numbers – that would ensure adequate provision was provided for parking, via either additional driveway or parking spaces or on street parking (and was necessary because of the tendency for garages to be used for storage/domestic purposes). For individual dwellings a common sense approach would be applied.

A further query was raised with regard to the operation of the escalator for electrical charging points and would it not be better to increase the percentage annually rather than every 5 years. The Group Head of Planning explained the 5 yearly increment would provide Development Management and developers with more certainty, which would make implementation easier.

Following further comment, the Subcommittee

#### RECOMMEND TO FULL COUNCIL ON 15 JANUARY 2020

That, following publication of the Supplementary Planning Document (SPD) for 4 weeks, together with the statement of representations and Arun's proposed response, and subject to the proposed changes detailed in the report and any further minor changes made by the Group Head of Planning, in consultation with the Chairman and Portfolio Holder for Planning, the Parking Standards SPD be adopted.

#### 16. HOUSING DELIVERY TEST - ACTION PLAN

In February 2019 the Government published the November 2018 Housing Delivery Test (HDT) result for Arun which was 91%. This meant that the Council should prepare an Action Plan aimed at boosting housing delivery. By way of this report, the Planning Policy Team Leader presented a draft Action Plan for Members' consideration which, if approved, would be required to be published on the Council's website.

The Action Plan set out the HDT methodology and the context for Arun's performance at 91%, including some of the barriers to delivery and included perceived solutions. It also set out the risks arising from further under-delivery in terms of the 5 years housing land supply and the presumption in favour of sustainable development as set out at paragraph 11.d of the National Planning Policy Framework 2019.

Whilst being broadly in favour of the Action Plan, Members concentrated much of their debate around paragraph 1.7 of the report which proposed investigation into whether the Council should invite applications from landowners/developers on 'deliverable' HELAA (Housing Employment Land Availability Assessment) sites in order to help boost housing delivery. Serious concerns were expressed that the sites that might come forward would be unsuitable e.g. outside the built-up area boundary and that the sustainability assessment had not yet been completed with regard to HELAA sites within climate change flood contours. The Group Head of Planning advised the Subcommittee that, although sites might come forward, they still had to go through the planning process and would not be automatically approved. Work was currently being undertaken to update the HELAA and it was due to be presented to the December meeting.

Further Member comments were made around sustainability; low carbon developments; impacts on the Local Plan; need to address the current 5-year shortfall; government housing requirements. The Group Head of Planning explained that there

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was already a shortfall on the 5 year housing supply which triggered the presumption in favour of development. There was concern about what infrastructure delays were hampering development – these appeared to be big schemes such as the A29 and, also, Southern Water applying for licensing restrictions. The impact of delays to the housing trajectory and developing HELAA sites to compensate would mean that some delayed schemes would be pushed beyond the current plan period and would then be a matter for the next plan review.

As it was proposed and duly seconded that the “question be now put” the Subcommittee

**RECOMMEND TO FULL COUNCIL ON 13 NOVEMBER 2019**

That, subject to any further minor changes made by the Group Head of Planning, in consultation with the Chairman and the Portfolio Holder for Planning, the Action Plan be approved as a technical document for publication on the Council’s web site.

(The meeting concluded at 8.30 pm)

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 17 DECEMBER 2019

#### PART A : REPORT

**SUBJECT: LOCAL PLAN OPTIONS**

<b>REPORT AUTHOR:</b>	Neil Crowther, Group Head of Planning
<b>DATE:</b>	October 2019
<b>EXTN:</b>	x 37839
<b>PORTFOLIO AREA:</b>	Planning

#### EXECUTIVE SUMMARY:

All Councils are under a statutory obligation to prepare a Local Plan, and the National Planning Policy Framework (NPPF) requires Councils to review Local Plan policies every five years. Para 12.1.12 of the existing Arun Local Plan indicates that if our housing delivery is below the required levels for two consecutive years, the Council will initiate a partial review of the Plan (in order to increase provision). There is therefore now a requirement to commence work on a review of some of the Local Plan and this report explores the options available to the Council.

#### RECOMMENDATIONS:

That Planning Policy Sub-Committee recommend to Full Council that:

- i. A combination of options 1 and 3 are pursued.
- ii. The update of the Local Plan commences that will update the Development Management (DM) policies in the Local Plan, so that these can be used by the Council in the short term, before completing an update of the full Plan. This would involve gathering evidence to supported updated policies, formal and informal consultation and agreement of Full Council.
- iii. Notes the likely costs of approx. £1mil and timescales of this process.
- iv. Future reports to Planning Policy Sub-Committee will report on progress at relevant stages of this process and the scope of evidence.

#### BACKGROUND:

1. The Arun Local Plan was adopted in July 2018.
2. A Local Plan's main role is to be used by the Council to determine planning applications. This can range from simple "householder" applications (such as extensions and conservatories), through to more complex strategic ones (such as major new residential sites). It is also important to have a Plan in place to assist the Council in negotiating what infrastructure and local improvements it can secure

through these larger applications. Having an up to date Local Plan also provides a coordinated approach to development which enables the assessment of cumulative implications and requirements for speculative applications. Those looking to invest in the district also look to the Council having an up to date Plan as a measure of the scale of risk for any investment. The Local Plan will also be a key document in planning enforcement matters and helping the Council in defending appeals against its planning decisions and speculative planning applications.

3. All Councils are under a statutory obligation to prepare a Local Plan, and the National Planning Policy Framework (NPPF) requires Councils to review Local Plan policies every five years. This is set out in Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 and Section 10(A) of the Town & Country Planning Regulations 2012.
4. National Planning Guidance confirms that 'to be effective plans need to be kept up-to-date. The National Planning Policy Framework states policies in Local Plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary.' Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.
5. It is important to note that the requirement to 'review' is not automatically a requirement to 'update'. A review of a Local Plan could conclude that the Plan is up to date and does not need to be updated or it could conclude that only parts of the Plan need updating. Any update to a Plan will need to be supported by evidence that is consulted upon and examined before those parts can be adopted.
6. Following the District Elections in May 2019, the new Council has agreed the strategic targets for the new administration (13 November 2019). These include, as a high priority, to develop a new planning framework to improve the level of sustainability and infrastructure and revise the Development Management policies as part of a Local Plan review to reflect the change in the council's priorities.
7. Planning Policy Sub-Committee (15 October 2019) have resolved to declare a Climate Emergency and to proceed with gathering evidence with the aim of achieving higher sustainable design standard to achieve zero carbon developments by 2030. These resolutions will go forward to the Environment and Leisure Working Group (7 November 2019) and Full Council (8 January 2020).
8. It should be noted that at para 12.1.12 of the existing Local Plan it indicates that if our delivery is below the required levels for two consecutive years, we will initiate a partial review of the Plan (in order to increase provision). Delivery over the past two years has been 704 and 603 against a requirement of 930 and 930. There is therefore now a requirement to commence work on a review of some of the Local Plan. However, it is worth exploring other options as part of this process as something more comprehensive could be undertaken if the Council felt that there was a need to do so.

### **Option 1 – New Local Plan**

9. The adopted Arun Local Plan covers the period 2011 – 2031 and includes a housing requirement of 1,000 dwellings per year (919 for Arun and 81 for neighbouring authorities) This option would involve an assessment of the District's updated housing needs (currently approx. 1,200 per annum) and 'roll' the Plan forward 5 years up to 2036. Therefore, it would need to accommodate an additional 5 years' worth of housing needs. It would also require full formal consultation and therefore the likely minimum timescale is at least three years. It is difficult to precisely predict the cost because the costs are often influenced by whether any work must be updated if there are delays in the process. For example, in the preparation of the last Local Plan the Council was unsuccessful in trying to sustain its argument (at the examination) for a lower level of housing than the evidence suggested and therefore the subsequent postponement of the examination led to significant additional costs for refreshing the evidence base based on the assumptions of higher housing numbers.
10. In terms of timescales, a full review of the Local Plan would take a minimum of 3 years, but it would be more likely to be over 4 years. One of the recently agreed Strategic Priorities of the Council is to improve engagement with the public. The preparation of the current Local Plan involved a significant amount of consultation over a long period of time (some statutory with additional informal consultation) and additional consultation will have implications on timescales. It should also be noted that it is unlikely that a full update of the Local Plan would be achieved prior to the District elections in 2024.
11. One further outcome of pursuing this option is that it would be sensible, after initial publication, to halt further work on a separate Small Sites Development Plan document to address the remaining 1,250 homes that need to be found under the terms of the current Local Plan. Instead this work could be absorbed into the work on creating a new Local Plan.
12. Whilst detailed cost estimates are unable to be made at this time, it is reasonable to assume that this option is likely to be around £1mil. This was set out in the report to Full Council on 13 November 2019.

### **Option 2 – Revised Strategic Housing Allocations**

13. To seek to extinguish the existing strategic allocations would be incredibly risky for a number of reasons and is not an option Officers would consider has any realistic prospect of success. It would also be futile because the majority of current strategic allocations have received planning permission or will have planning application submissions within the next 12 months.
14. Notwithstanding the timing issue for the Council, to succeed with such a review at examination would require the Council to demonstrate why the allocations being extinguished are unsound. This is not the same as saying the site is not liked and robust evidence will be required to justify this. The Council would have to be able to demonstrate why its own evidence obtained in recent years is manifestly wrong now. Given the Council concluded that the allocations were sound less than two years ago

it would prove very challenging to now argue the opposite. The Council would also have to demonstrate that there are viable alternatives that could deliver the required Housing Land Supply.

15. Furthermore, any resolution to approve a course of action that promoted such a change would almost certainly be challenged in the courts by those who faced losing a significant uplift in the value of their asset. There is also considerable risk to the delivery of the necessary and planned strategic infrastructure e.g. Secondary School, A29 and Ford bridges – as well damage to the Councils reputation.
16. At an examination it is highly likely that the Inspector will require the Council to have addressed the higher housing requirements in any revised plan. It will not be possible to divorce revised site allocations from housing need requirements.
17. This option would result in the Council entering into a very long and expensive litigious process while at the same time having to establish new allocations based on newly commissioned evidence to accommodate the higher housing numbers (thereby having to find more sites than we currently have). This would have significant risks in terms of costs as well as minimal prospect of success.

### **Option 3 – Updated Development Management Policies**

18. In terms of the process to be followed it would be very similar to options 1 and 2 and would therefore take approximately 2 years. The intention would be look at each of the 'Development Management' policies such as the climate change policies to determine whether any changes were necessary to make them more robust or to improve the quality of the outcomes they were seeking, particularly in response to the Council's Strategic Priorities or changing or Government requirements had increased. For example, the Government is introducing new legislation regarding 'Net Biodiversity Gain' for all developers. Our policies could be modified to assist in the delivery of this objective.
19. As mentioned at para 6, the Council has recently agreed our Strategic Targets for the period 2019 – 2023. The High Priority targets include;
  - Responding to a Climate Emergency
  - Develop a new planning framework to deliver the Council priorities by improving sustainability and infrastructure through new and updated planning policies
  - Maximising social housing
  - Better public engagement
20. In terms of cost for this element alone, there would be the need to produce an updated evidence base which would also include the need to produce a viability impact analysis of any new requirements upon development as well as other documents (which may include a need to update the CIL Charging Schedule). The likely total costs would be between £200k and £400k.
21. If option 1 was followed this option would be automatically be part of it. Also undertaking this option alone would impact upon other work proprieties and would potentially impact upon our ability to start a full update of the next Local Plan. It would



also mean that by the time the policies are updated, the process of preparing an updated Local Plan will be delayed and, during this time, the Council will likely be forced to accept more speculative developments in order to address housing needs.

22. It is recognised that the Sub-Committee have recently agreed to prepare the gathering of evidence in order to review climate change policies/standards which will start in 2020/21 with a view to updating these policies.

#### **Option 4 – Supplementary Planning Documents**

23. This option would involve identifying those policies in the Local Plan where it would be possible to develop Supplementary Planning Documents to improve the quality of the outcomes the Council is seeking without conflict with the wording of individual policies.
24. For example, policy ENV DM5 is 'Development and biodiversity'. There are no particular standards set in the policy, so guidance could be produced to assist in its interpretation and overall impact. However, policy ECC SP2 'Energy and Climate change mitigation' specifically refers to 10% of all energy usage coming from on-site renewables. Therefore, any SPD could not increase this figure only provide guidance on how best to deliver it. For it to be changed would require one of the other options to be followed. Current SPD's are progressing on Design and Open Space and these will add detail to policies in existing Local Plan. If different policies relating to standards/requirements for development in the District are sought, then SPD's will follow the adoption of updated policies and will accord with the recently approved Strategic Target of the Council.
25. In terms of how long this would take it would depend on whether the intention was to produce all the SPD's in one go or stagger their development. The former option would probably take a total of 18 months.
26. Any new guidance would need to be viability tested for its impact upon development and subject to consultation. The cost would again depend on how much guidance was being produced but a range of between £100k and £250k is envisaged.

#### **Option 5 – Do Nothing**

27. Preparing a Local Plan is a substantial cost for a Council. A full Local Plan could cost around over £1 mil over 3 – 4 years. At a time when the housing requirements are so significant and if the Council considers that achieving those requirements is unrealistic if the development industry is unable to keep pace with the requirements, one option is not to have a Local Plan. This option would then place a higher reliance on the NPPF to determine planning applications and may save money for other higher priorities, but the Council will need to accept the risks.
28. As demonstrated by the current Local Plan, the Council could spend a substantial amount of money to deliver a Local Plan that will (in part) be considered 'out of date' within 18 months of adoption. The Council will have to consider whether the benefits of having other Development Management and economic policies outweigh the cost of a Local Plan.

29. In considering this option, the Council have to be mindful of the requirements in Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 that sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole). The risk of adopting this option would be that the Secretary of State could intervene if he/she considered that the Council were failing in their obligation to prepare a development plan. They could either 'direct' the Council to take specific action or remove the plan making function of the Council and prepare a plan for us (at the expense of the Council). This is set out in the Planning and Compulsory Purchase Act 2004 section 27) and the Town and Country Planning (Local Planning) (England) Regulations 2012 Schedule 2.
30. This option could also result in less infrastructure being delivered because, in the absence of a Local Plan, the Council's negotiating position and power would be diminished and planning by appeal would result whereby infrastructure asks may not be considered strategically and may not be agreed by Inspectors.
31. Whilst it appears inevitable that an updated Plan would result in higher housing requirements and that these requirements are very likely to be unrealistic and undeliverable, the significant costs probably outweigh the prospect of having plan making functions taken away from the Council and the risks associated with this.

#### **General Comments - Process & Requirements**

32. It is important that the Council has a clear vision of the place it is trying to create but this will always need to be set in the context of national planning policy. The key issue is usually the scale of any housebuilding in the district.
33. To establish the amount of homes a Local Plan provided the Council must go through three steps.
- i. The starting point is working out the housing need – historically the process was undertaken by individual councils. It would have excluded any policy aspirations that might drive the housing need higher. It would have also excluded at this stage any policy constraints (such as Agricultural Land Classification) that might mean the need cannot be provided locally. This process has now been replaced by a standard methodology set by the government (see below).
  - ii. The next step is to identify a housing requirement for the plan. This can take account of any policy commitments to boost growth in the area, as well as any constraints which may necessitate a reduction in the amount planned for. If the amount is reduced below the need, then the Council will have to reach agreement with its neighbours to export it as unmet housing need. The housing requirement is what the Council will assess its housing land supply against.
  - iii. Finally, the supply is the amount of homes that are allocated, or already committed, in the plan. This can exceed the requirement, but the plan won't be found sound if it doesn't provide enough homes to meet it. The supply should exceed the requirement to ensure flexibility and to provide a buffer.

34. The NPPF and National Planning Practice Guidance (the Guidance) now direct how we should work out our housing need and requirement. For Arun this new standard methodology states that we should be working to a basic need of approx. 1,200 new homes per annum. This compares with the current Local Plan need of 919. The previous Local Plan (2003) required 580 homes per annum.
35. In terms of translating this into a housing requirement we need to consider factors such as economic growth. Officers believe that there is circumstantial evidence to suggest that the local market cannot sustain the current level of housing growth that is contained within the existing Local Plan or the updated housing requirement figures. However, to run an argument to say that the numbers are too high requires evidence of market failure and this would need to be a trend against the current supply proposed in the Local Plan and a need to allow sufficient time in which delivery on strategic allocations can be assessed.
36. In terms of the supply an emerging Local Plan can count “committed development” from the specified start date. Our current Local Plan start date is April 2011. In a review we would probably start as 2016 or 2021 depending upon when the review started. Committed development includes houses that have already been built, those with planning permission, as well as any site that already has an allocation (either through the Local Plan or Neighbourhood Plans).
37. Other key issues that any Local Plan Review might cover (in whole or in part) include the economy (further employment allocations); infrastructure provision; biodiversity; well-being and climate change.
38. There is certainly an opportunity to shape the development plan in a way which reflects the priorities of the Council, but this will always have to be done in the context of national guidance/policy. Failure to do so could ultimately lead in the medium term to the Council having its plan making powers removed and in the short term having an increase in adverse planning decisions at Appeal.

### **RECOMMENDATION**

39. Officers consider that there is potential for updating the Local Plan over a 3 – 5 year period whilst at the same time carrying out and implementing an update of the Development Management (DM) policies so that these can be used by the Council in the short term (rather than having to wait until a full update is completed). Essentially, this would mean focussing the early stage of an update on the DM policies. This would be a combination of options 1 and 3 above.
40. This would involve identifying strategic objectives and a vision for the Plan, commissioning appropriate evidence, testing the impact of these updated policies on the viability of development and then undertake some public consultation. The Council could then adopt them (after considering the responses received) to assist decision making in planning. However, these policies would not carry the same weight as adopted Local Plan policies at that stage because they wouldn't have been tested through an examination but the Council could seek to use them in negotiations on individual schemes, recognising that we might not always be able to secure what

we want. An indicative process is set out below;

- Following Local Plan Options Report decision by PPSC - Update the Local Development Scheme accordingly – to be adopted by Full Council March 2020
- Member Working Party to be set up to review Vision and Objective for the Authority Spring 2020
- Methodology for the scope for reviewing the Local Plan to be agreed based on Key Issues and Objectives Summer 2020
- Early Duty to Cooperate engagement with authorities sharing Arun's Housing Market Area and Parish/Town Councils - Summer 2020
- Identify Evidence Base requirement and set base budget
- Agree Consultation Strategy and update Statement of Community Involvement
- Publish Issues & Options consultation document
- Evidence base procurement process
- Assess evidence base prior to policy formulation
- Agree set of draft Development Management Policies
- Full Council agree draft Plan
- Regulation 18 Draft Plan consultation
- Regulation 19 Publication plan
- Submission
- Examination
- Inspector's Report
- Adoption

41. Concurrently, an update of the Local Plan will also then start to focus on the site allocations and other strategic policies in the Plan.

42. The intention would be that the two streams of work would then merge to complete the Local Plan process. Depending on timing, we may need to review some of the work done in the first stream, particularly on viability, later in the process.

43. Overall this two-stream approach maybe slightly more costly than doing it as one stream, however it does allow you the opportunity to potentially use the improved standards you are looking for more quickly.

### **Conclusion**

44. The frustration the Council has in terms of the unrealistic targets being set which are outside of its control is fully understood by officers. However, planning legislation and national policy require that these targets are included within Local Plans as a starting point and the advice in this report is based on what will be robust and deliverable options. There is no getting away from the fact that there will be difficult and unpopular decisions around housing numbers and sites at some point during the process of reviewing and updating a Local Plan.

45. Officers consider that a combination of options 1 and 3 would provide the new administration of the Council with an opportunity to set new development management objectives in policy. However, this process will have to be aligned with an update of the strategic elements of the Plan which will include updated housing

requirements and new housing allocations.		
<b>2. PROPOSAL(S):</b>		
<b>3. OPTIONS:</b> The options are set out within the report. The council can select on from options 1 to 4 on the scope for reviewing the development plan or supporting polices or option 5 which is to do nothing.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		<b>x</b>
Relevant District Ward Councillors		<b>x</b>
Other groups/persons (please specify)		<b>x</b>
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	<b>x</b>	
Legal	<b>x</b>	
Human Rights/Equality Impact Assessment	<b>x</b>	
Community Safety including Section 17 of Crime & Disorder Act		<b>x</b>
Sustainability	<b>x</b>	
Asset Management/Property/Land		<b>x</b>
Technology		<b>x</b>
Other (please explain)		
<b>6. IMPLICATIONS:</b> There are significant financial implications for the Council within this recommendation.		
<b>7. REASON FOR THE DECISION:</b> To ensure that Arun District Council maintains an effective and sound development plan which responds to the challenges of the future (e.g. Climate Change) and sets a sustainable pattern of growth and sustainable polices for the determination of development proposals and planning applications.		
<b>8. BACKGROUND PAPERS:</b> None		

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB COMMITTEE ON 17 DECEMBER 2019

#### PART A : REPORT

<b>SUBJECT:</b> Arun Design Guide Supplementary Planning Document (SPD)
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<b>REPORT AUTHOR:</b>	Donna Moles, Senior Planning Officer
<b>DATE:</b>	18 November 2019
<b>EXTN:</b>	x 37697
<b>PORTFOLIO AREA:</b>	Planning Policy

#### EXECUTIVE SUMMARY:

This report updates members on the preparation of the Arun Design Guide Supplementary Planning Document (Design Guide SPD) – which will be subject to a four-week consultation in the spring 2020 and then subsequent adoption by Full Council. The Design Guidance provides more detailed guidance on the application of design polices within the adopted Arun Local Plan 2018 and will be used as a material consideration for the determination of planning applications and will be a vital planning tool for shaping new development in line with the policies set out in the Local Plan.

#### RECOMMENDATIONS:

That the Planning Policy Sub Committee agrees:

1. The proposed approach and timetable for the public consultation on the Consultation Draft version of the Design Guide Supplementary Planning Document which will be published for a 4-week public consultation from 9<sup>th</sup> January to 6<sup>th</sup> February 2020;
2. That the Group Head of Planning in conjunction with the Planning portfolio holder and the Chair of the Planning Policy Sub-Committee be granted delegated authority to finalise the Design Guide SPD Consultation document for publication; and
3. That following consultation, any responses are reported back to Planning Policy Sub Committee to agree any further changes prior to the Design Guide being referred to Full Council for adoption.

## **1. BACKGROUND:**

1.1 The Arun District Design Guide sets out the Council's expectations with regard to the design quality of new development, and for the preservation, conservation and enhancement of the built and natural environment with its distinctive character and qualities that can be found within the District.

1.2 The Arun District Design Guide Supplementary Planning Document (SPD) is intended to provide further detail to the Design policies of the Arun Local Plan (chapter 13) and to raise the standard of design across the District. The SPD will set out what the Council expects development proposals to deliver in terms of the design quality within Arun respectfully responding to landscape, connections, public space, the mix of uses, how buildings relate to their context as well as size, shape and appearance. It is also concerned with vital matters like refuse bins and car parking and is about placemaking; not just about the appearance of buildings.

*'Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term.'* Planning Practice Guidance para 001.

1.3 The Guide aims to:

- address past and current challenges and provide for future needs;
- improve and enhance the distinctive character and qualities of Arun;
- create design principles and criteria that applications should meet and are easy to follow;
- set out the design process that should be followed in order to achieve high quality design, educating readers on best practice, design principles and terminology;
- provide an effective tool that can be used by a variety of people regardless of their familiarity with the application, masterplanning and design processes; guiding applicants through a step-by-step process to ease assessment of proposed development; and
- set out ADC's expectations for future development, safeguarding the District's identity while shaping the future.

1.4 Policies D SP1 'Design', D DM1 'Aspects of form and design quality' and D DM4 'Extensions and alterations to existing buildings', provide a framework which sets the principles of good design across the District. Good design is an integral part of good planning; therefore, the design policies are in alignment with all other policies in the Plan including the strategic policies. They also require development to comply with the Arun District Council Design Guide which will be brought forward through the Design Guide SPD.

1.5 Supplementary Planning Documents (SPDs) are prepared by the Council to support the Local Plan, inform the delivery of infrastructure and to aid applicants in preparing successful development proposals. Following public consultation and adoption by the Council, SPDs become a material consideration in determining planning applications.



1.6 Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design.

1.7 Planning has a critical role to play in the delivery of good design. The Government's recent reforms (e.g. National Planning Policy Framework 2019 (NPPF 2019)) have ensured that good design and good planning should be indivisible and have set a policy framework that facilitates the delivery of good quality places on the ground. The NPPF 2019 promotes the principles of good design throughout the framework but it is particularly addressed in Chapter 12 – Achieving well-designed places. Paragraph 126 is of significance: -

*“To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”*

1.8 The government published the National Design Guide in late September 2019 which provides a general structure that can be used for the content of local design guides and includes ten characteristics which reflect the government's priorities in a common overarching framework. The proposed Arun Design Guide SPD incorporates all of those key ten characteristics of the framework.

1.9 The key objectives of the Design Guide (not listed in any priority order) which provide the basis for the guidance are:

- Local Distinctiveness, Character & Identity
- Cohesive & Vibrant Neighbourhoods
- Diversity
- Ease of Movement
- Accessibility & Inclusion
- Legibility & Integration
- Adaptability & Future Needs
- Safety, Security & Crime Prevention
- Efficient Use of Natural Resources
- Innovation
- Climate Change & Sustainability
- Good Streets & Spaces
- Well Designed Buildings

1.10 The Arun District Design Guide consists of criteria and principles that development should adhere to, followed by supporting text, illustrations and general guidance. The guidance is relevant to all scales of development (from a major residential development with several hundred new homes to a modest extension or conversion to an existing building) and to different contexts (coastal towns and surrounding settlements, inland Arun and the countryside). The

Design Guide is structured into three main sections, subdivided into further chapters covering topics from strategic place-making principles to detailed guidance on specific issues:

### **Section 1**

- Introduction: explains what the Design Guide will achieve and how it should be used.
- Chapter A: sets out the characteristics and value of 'good design' and the key design objectives of the document.
- Chapter B: explains the process of design and the role of the Design Guide within this.
- Chapter C: offers an overview of the existing character and context of Arun District in order to provide an initial basis for character assessment.

### **Section 2**

#### Masterplanning & Working with the Guide

- Chapter D: Responding to the Site and its Setting
- Chapter E: Natural Environment
- Chapter F: Movement Framework
- Chapter G: Built Structure & Development Plots
- Chapter H: Welcoming Streets and Spaces
- Chapter I: Parking Strategy
- Chapter J: Building Design
- Chapter K: Climate Change and Sustainability
- Chapter L: Ensuring Quality

### **Section 3**

#### Development & Intervention Types

- Chapter M: Housing Extensions
- Chapter N: Building Conversions
- Chapter O: Strategic Housing (100< dwellings) & Major Residential Development (10-100 dwellings)
- Chapter P: Infill Development (2-9 dwellings)
- Chapter Q: Rural Development
- Chapter R: Apartment Buildings
- Chapter S: New Homes
- Chapter T: Mixed Use Schemes

1.11 The Guide seeks to assist a range of key players in the process of developing and accessing high quality design. It should be read by:-

- Landowners, developers and agents considering potential development proposals;
- Householders considering residential conversions, alterations and extensions;
- Designers drawing up schemes;
- Development Management Officers assessing the suitability of proposals when determining applications;

- Statutory and non-statutory consultees, and members of the public commenting on planning applications; and
- Town/Parish Councils and residents commenting on planning applications.

1.12 Securing good design is central to good planning and place-making. The appearance of a proposed development and its relationship to its surroundings are material planning considerations. All planning decisions within the district must be made in accordance with the Development Plan, which includes the Local Plan. Once adopted, as a Supplementary Planning Document (SPD) the Arun Design Guide will become a material consideration to guide decisions relating to planning applications and will be a vital planning tool for shaping new development in line with the policies set out in the Local Plan.

1.13 Prior to its adoption, including during and after the consultation and public participation period, the Arun Design Guide SPD carries weight that may be material for consideration by developers and decision makers when preparing and determining planning applications for new development.

#### 1.14 NEXT STEPS AND TIMETABLE

Stage	Date
Produce draft SPD document and present to members and officers at workshop. Invite comments to develop content.	3 <sup>rd</sup> October 2019
Draft Consultation version of the Arun Design Guide SPD taken to Planning Policy Sub-committee	17 <sup>th</sup> December 2019
Advertise and consult widely on the Design Guide SPD for 4 weeks	9 <sup>th</sup> Jan to 6 <sup>th</sup> Feb 2020
Planning Policy Sub Committee to get agreement for the Regulation 12 Statement of public participation, setting out the consultation process, a summary of main issues raised and how those issues were addressed	March 2020 (TBC)
Full Council to get agreement to adopt the Arun Design Guide SPD	April 2020
Publication of final Design Guide SPD, Non-Technical Summary to the Design Guide SPD and Adoption Statement	April 2020
Presentation and training session to ensure appropriate and effective use of the Design Guide SPD for members and officers	April 2020

#### 2. PROPOSAL(S):

That the Arun Design Guide SPD is recommended for the 4-week consultation before reporting back representations and a proposed response to the Planning Policy Sub-Committee.

#### 3. OPTIONS:

The following options are available to Members:

1. To recommend that the draft Arun Design Guide SPD is published for a 4 week public consultation **OR**
2. Not to recommend that the draft Arun Design Guide SPD is published for the 4-

week consultation.		
<b>4. CONSULTATION:</b>		
There has been informal consultation on the working draft version.		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council	x	
Relevant District Ward Councillors	x	
Other groups/persons (please specify)	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>		
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
Due to this SPD being subject to public consultation, as it progresses to adoption it will have added weight as a material consideration in the determining of planning applications and help to secure more sustainable development benefitting local communities and help improve place making for Arun.		

<b>7. REASON FOR THE DECISION:</b>
To ensure that Arun can continue to secure development that is plan led and consistent with sustainable development as well as development which would improve the wellbeing of the people through improved built and natural environments.

<b>8. BACKGROUND PAPERS:</b>
1. Arun Design Guide SPD – Consultation Draft (December 2019):- <a href="https://www.arun.gov.uk/supplementary-planning-documents-spds">https://www.arun.gov.uk/supplementary-planning-documents-spds</a>



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## ARUN DISTRICT COUNCIL

### REPORT TO PLANNING POLICY SUB-COMMITTEE ON 17 DECEMBER 2019

#### PART A: REPORT

**SUBJECT: Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document (SPD) and Arun Parking Standards SPD**

**REPORT AUTHOR:** Kevin Owen, Planning Policy Team Leader  
**DATE:** 27 November 2019  
**EXTN:** x 37853  
**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

Following a four-week Regulation 12 Public participation' period (The Town and Country Planning (Local Planning) (England) Regulations 2012), a limited number of comments were received on the two proposed Supplementary Planning Documents (SPDs): Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document (SPD); and Arun Parking Standards SPD which the Sub-Committee had recommended at its last meeting of 15 October 2019 should be referred to Full Council for adoption on 15 January 2020. The comments raised on the respective SPDs do not raise material objections or issues but request a limited number of clarifications which it is considered will helpfully improve the interpretation of the SPDs. The changes can be made under delegated authority and the SPDs can accordingly be referred to Full Council for adoption.

#### RECOMMENDATIONS:

That the Planning Policy Sub-Committee recommend to Full Council that:

- a) subject to the minor drafting changes detailed in this report (and any further minor changes made by the Group Head of Planning, in consultation with the Chairman of the Planning Policy Sub Committee and Cabinet Member for Planning), that the Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document be adopted;
- b) subject to the minor drafting changes detailed in this report (and any further minor changes made by the Group Head of Planning, in consultation with the Chairman of the Planning Policy Sub Committee and Cabinet Member for Planning), that the Arun Parking Standards Supplementary Planning Document be adopted;
- c) as soon as reasonably practical after adoption, both SPDs together with an Adoption Statement, be made available for inspection and published to the Council's website, and sent to any persons who have requested to be notified.

#### 1. BACKGROUND:

1.1 On 15 October 2019, the Planning Policy Sub-Committee considered the following draft SPDs for a Regulation 12 (The Town and Country Planning (Local Planning) (England) Regulations 2012) 'Public participation' period: -

- Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document; and
- Arun Parking Standards Supplementary Planning Document

**Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document (OS SPD)**

1.2 The Regulation 12 four-week period has been completed and there were 4 representations on the draft OS SPD:-

- Highways England and Yapton Parish Council confirmed that they did not wish to make further comment;
- Sport England advised that Active Places Power playing pitch calculator did not seem to retain the KKP consultants input factors/formulae for Arun which therefore, need to be saved in the calculator on the web site and that the OS SPD needs to clarify that this calculator is only accessible to the Local Planning Authority;
- Bourne Leisure Ltd requested that the Council's acceptance of their previous representation reported to 15 October 2019 Planning Policy Committee had not been carried though i.e. that the following underlined wording should have been added to paragraph 4.4:-

*"...the following types of development will not need to meet the requirements: replacement dwellings, extensions/ annexes, rest homes, nursing homes, other institutional uses, tourism accommodation and temporary permissions for mobile homes..."*

1.3 The Sport England representation can be resolved by adding the wording "(accessible to the Local Planning Authority on the Active Places website)" after each reference to the Open Spaces Calculator within the document.

1.4 The proposed wording by Bourne Leisure Ltd is accepted and resolves the outstanding action that should have been taken.

**Arun Parking Standards Supplementary Planning Document (AS SPD)**

1.5 There were 4 representations on the draft APS SPD:-

- Highways England and Yapton Parish Council confirmed that they did not wish to make further comment;
- Bourne Leisure Ltd requested that the flexibility to the location and configuration of Electric Vehicle charging points and to applying minimum parking standards (acknowledged by the Council's response to their representations on the October draft APS SPD), should be made more explicit with respect to leisure and tourism uses by proposing amended (underlined) wording for paragraph 2.7 and an amended footnote to Table



4.1 :-

*“2.7 The Council has reviewed both the WSCC GPND and Electric Vehicle Infrastructure Study (2017) and has taken forward a hybrid approach for the future requirement for EV charging points in new development. The minimum requirements are set out in Table 2.2 below. These standards should be used as a guide for developers and will be assessed on a case-by-case basis.”*

*“Note: C1, C2, C2A and C4 uses parking provision will be determined on a case by case basis on travel plan and needs. Parking provision for ‘other’ uses should be applied on a case-by-case basis depending on the nature of the proposed development”.*

- 1.6 The Council accepts further clarification can be made but to ensure that the flexibility is closely defined to this specific additional issue of leisure and tourism, will make the following wording amendments (as underlined and strike through):-

*“2.7 The Council has reviewed both the WSCC GPND and Electric Vehicle Infrastructure Study (2017) and has taken forward a hybrid approach for the future requirement for EV charging points in new development. The minimum requirements are set out in Table 2.2 below. Forms of development such as Leisure and tourism (D2) facilities where concentrated configuration and electricity supply capacity requires a pragmatic approach to EV charging points, can be assessed on a case by case basis...”*

*“Note: C1, C2, C2A, ~~and C4~~, and D2 uses parking provision will be determined on a case by case basis on travel plan and needs.”*

- Angmering Parish Council (APC) contested that the West Sussex County Council 2011 Census data for establishing parking behaviour zones and parking standards adapted for Arun, does not allow for newer housing developments (e.g. Bramely Green survey 2004) where local surveys demonstrate higher car ownership, and travel to work compared to 2011 census data for Arun district and also identify local visitor/on street parking issues. APC therefore propose wording amendments to the section dealing with Principle 2 para 2.15:-

*“Calculation of expected levels of vehicle ownership for new large residential development should be assessed on a case by case basis and normally be based on local or comparable data such as Household Surveys of new development carried out by the Local Authority where these exist, taking into account of forecast changes in demand for the Local Plan period. Where...”*

- 1.7 The Council understands the need to ensure that local based data is clarified and used where available. However, as the paragraph refers to all types of residential development the Council will amend Principle 2 para 2.15 wording as follows: -

*“Calculation of expected levels of vehicle ownership should normally be based on local or comparable data which may include Census data and local Household Surveys of new development carried out by the Local Authority where these exist,*

*taking into account of forecast changes in demand for the Local Plan period. Where...”*

- 1.8 The above proposed minor clarifications and wording amendments will resolve the representations made. The two SPDs should therefore, progress to Full Council for adoption on 15 January 2020.

**2. PROPOSAL(S):**

The Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document and Arun Parking Standards Supplementary Planning Document, be referred to Full Council for adoption in order that the SPDs can be used to guide Development Management decisions when applications are being determined.

**3. OPTIONS:**

1. To adopt both sets of SPD guidance to provide a material consideration for Development Management decisions on planning applications, as recommended, or
2. To not adopt the SPD guidance.

**4. CONSULTATION:**

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify) Town and Parish Councils, residents, development industry, utilities, agencies and business within Arun.	x	

**5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)**

	YES	NO
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x

**6. IMPLICATIONS:**

Both sets of SPD will help to implement associated respective Opens Space and Parking polices set out within the adopted Arun Local Plan 2018 through guiding Development Management decisions on standards and expected levels of contributions while ensuring that development is viable and deliverable.

**7. REASON FOR THE DECISION:**

The recommendations are intended to ensure that developments deliver the necessary level of provision in order to mitigate their impact in relation to the scale of development proposed and consequent demand from population and households who use such facilities.

**8. BACKGROUND PAPERS:**

1. Item 14: Open Space, Playing Pitches and Built Sports Facilities SPD – Planning Policy Sub-Committee 15 October 2019:-

<https://democracy.arun.gov.uk/documents/s2381/Open%20Spaces%20SPD.pdf>

2. Item 15: Arun Parking Standards SPD – Planning Policy Sub-Committee 15 October 2019:-

<https://democracy.arun.gov.uk/documents/s2370/Parking%20Standards%20SPD.pdf>

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB COMMITTEE ON 17 DECEMBER 2019

#### PART A : REPORT

**SUBJECT: Gypsy & Traveller & Travelling Showmen Site Allocations Development Plan Document**

**REPORT AUTHOR:** Kevin Owen, Planning Policy Team Leader  
**DATE:** 19 November 2019  
**EXTN:** 37853  
**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

This report advises members on the outcome of the Gypsy & Traveller and Traveller Showmen (G&T) Site Allocations Issues and Options public consultation, undertaken in summer 2019 which included 9 existing sites for intensification to meet needs with a further new site option to be considered for allocation. The report summarises representations made and the Council's proposed response and sets out the next steps for preparing the G&T Site Allocations Development Plan Document.

#### RECOMMENDATIONS:

That the Planning Policy Sub Committee:-

1. Notes the consultation response to the Gypsy and Traveller and Traveller Showmen Issues and Options consultation;
2. Agrees that following further work to resolve objections, a Regulation 18 Draft Gypsy & Traveller and Traveller Showmen (G&T) Site Allocations Development Plan document be prepared for consultation in the late Spring 2020.

#### 1. BACKGROUND:

- 1.1 On 27 February 2019 Planning Policy Sub-Committee (PPSC) agreed that the Gypsy and Traveller Issues and Options document (G&TIO) be published for public consultation for 6 weeks (i.e. under Regulation 18 Town & Country Planning (Local Planning) (England) Regulations 2012).
- 1.2 The G&TIO document forms part of the early public consultation stage to inform the preparation of a draft Gypsy & Traveller and Traveller Showmen (G&T) Site allocations Development Plan Document (DPD) which would then be put for further consultation.
- 1.3 The final stage would be a (Regulation 19) publication DPD where consultation is limited to legal compliance and soundness issues and the DPD would then be

subject to an independent examination. If found sound – on adoption, it will form part of the statutory development plan for decision making.

- 1.4 In summary, the G&TIO document sets out the need for 9 pitches and 14 plots to be provided over the plan period (for G&T purposes the period covers 2018 to 2036).
- 1.5 Furthermore, the document proposes that this level of need is to be accommodated through intensification or expansion on 8 existing sites including an option for a new site (Background Paper 1) following the discounting of potential sites based on a G&T Site Identifications Study and informed by Sustainability Appraisal.
- 1.6 The 8 sites that have the potential capacity to accommodate more intensive/expanded provision are as follows: -

**Table 1 : G&T Pitches and Plots to meet residual need respectively**

Pitches Site Ref	Site Name	Existing & unimplemented Pitches	Pitches 2018-23	Pitches 2023-36	Pitches 2018-36
ARU031	Fieldview, Junction	3	0	0	
ARU049	Limmer Pond Stables	0	1	0	
ARU051	Dragonfly	0	0	1	
ARU_NS_1	The Caravan Site	1	0	1	
ARU044	2 Wyndham Acres	0	2	0	
<b>Need</b>			1	4	9
<b>Total Capacity</b>		4	3	2	9
<b>Balance</b>			<b>+2</b>	<b>-2</b>	<b>0</b>
Plots Site Ref	Site Name	Existing & unimplemented Plots	Plots 2018-23	Plots 2023-36	Plots 2018-36
AL4714	Aldingbourne Farm Shop	Site Ref	Site Name	0	8
ARU054	The Old Barns	1	0	1	2
ARU046	Nyton Stables	3	0	0	3
<b>Need</b>			3	3	14
<b>Total Capacity</b>		8	4	1	13
<b>Balance</b>			<b>+1</b>	<b>-2</b>	<b>-1</b>

- 1.7 An additional new site ARU-HELAA-46b - Land at Little Meadow, Yapton was also proposed for consideration.
- 1.8 The G&TIO consultation document was sent to adjacent authorities, Parish/Town Councils, individual consultees and other key stakeholders on the Council's consultation database. A Regulation 18 Notice accompanied letters and emails and was placed in the press, on the Council's web-based consultation portal and with documents for inspection deposited in the libraries and office receptions at the Civic Centre and at Bognor Regis.
- 1.9 Representations were received from 14 respondents (excluding one anonymous and inadmissible response). A summary of the representations is set out in Appendix 1 to this report together with the Council's proposed response against the matters raised. Appendix 2 and 3 respectively, provide further helpful tabulated summaries of responses according to question 1 site preferences and questions 2 to question 6.
- 1.10 A number of responses support that provision should be made for G&T needs but that adequate provision to safeguard amenity is made and that sites are operated well and can be accommodated within necessary infrastructure.
- 1.11 A number of comments and objections were also received on specific matters with regard to the evidence base and sites. No clear overall site preference pattern is identifiable except that there was some degree of support for intensification subject to protecting amenity. It should be noted that some respondents identified an order of site preference - but in order to make specific objections to those sites.

### **Evidence Base**

- 1.12 A resident of Aldingbourne objected to all proposed sites and was concerned that the majority fall within Aldingbourne Parish, which is disproportionate and added to existing amenity issues from unauthorised activity.
- 1.13 Aldingbourne Parish Council also object to the inclusion of 5 of the 8 proposed sites because of cumulative and disproportionate amenity impacts on infrastructure and the settled community within the Parish. It was also stated that Strategic Allocations should have been examined for G&T contributions in accordance with Policy H SP5 of the adopted Local Plan. Therefore, reasonable alternatives have not been established in the evidence. Further concern is given that G&T consent on the site AL4714 Land at Aldingbourne Farm Shop appears to have lapsed or been unlawfully implemented and the land area for intensification needs clarification. In addition, ARU044 Land East Wyndahm Acres is considered to be prone to flood risk and within a minerals safeguarding zone.
- 1.14 An individual was concerned that there was insufficient evidence on site occupancy/utilisation; strategic coordination with WSCC; financial implications and budget provision for delivery; occupier obligations to maintain sites etc.

1.15 Store Property Investments consider the evidence is factually inaccurate contending that for ARU040 Land West of Brook Lane, south of A259 Angmering, two existing personal consents for G&T purposes have lapsed and the individuals have found alternative accommodation. Furthermore, a recent application and appeal (APP/C3810/W/17/3185128) establishes that the legal use of the discounted site is not for Gypsy and traveller uses.

1.16 The Council's response is that: -

- The GTAA 2019 evidence included household interviews on current and future accommodation requirements and changes in traveller status including liaison and coordination with WSCC and neighbouring authorities on the 'Duty to Cooperate';
- The G&T Site Identification Study 2019 undertook site identification informed by several call for sites (including a review of HELAA sites and publicly owned land) and a discounting process, this work included seeking negotiated provision within Strategic Allocations (although no promoters/developers indicated any willingness to include such provision);
- The Site Identification study and Sustainability Appraisals have also informed the selection of sustainable and suitable sites;
- The distribution of sites also reflects availability and a willing promotion by site/landowners of existing sites demonstrating evidence of deliverability which is a requirement of land allocation;
- There are existing policies with the adopted Arun local Plan to protect resident amenity and the existing settled communities;
- Safeguards can also be included in site specific allocation policies within the DPD informed by further feasibility and deliverability evidence
- Further work will need to be undertaken to check the planning status and lawful use of sites and traveller status of some households on two sites (e.g. AL4714 Land at Aldingbourne Farm Shop).

### **Proposed Sites**

1.17 Barnham/Eastergate Parish Council supported ARU051 Dragonfly Eastergate Lane but had no objections on any sites falling within the Parish and have no other comments on any other matters in the consultation document.

1.18 Bersted Parish Council support intensification and the new site ARU-HELAA-46b - Land at Little Meadow, Yapton.

1.19 Bilsham Manor supported AL4714 Aldingbourne Farm shop but object to ARU-HELAA-46b - Land at Little Meadow, Yapton on the grounds of residential amenity/proximity, highway safety (junction Gravetts Lane West and Bilsham Road) and favoured limited extension to a discounted site at ARU030 Ryebank Caravan Park, Yapton.

1.20 Highways England have expressed a preference for ARU054 The Old Barnes Arundel Road and have stated that while there are no objections to any of the proposed sites, their key focus is maintaining the strategic road network as a national asset in terms of providing long-term operation and integrity e.g. in this



case primarily concerned with proposals that have the potential to impact the safe and efficient operation of the A27. For this reason, the agency has cautioned that the Council will need to ensure that ARU054 has safe and operational access for slow HGV movements onto and off the A27 and so the council will need to be satisfied that highway engineering measures to achieve this can be delivered.

- 1.21 Historic England comment on the proposed sites by requesting that further consideration be given to assessment of ARU031 Fieldview Pagham (upon listed Rookery Farmhouse Grade 2) and ARU054 The Old Barnes (upon listed Westergate House Grade 2) as the DPD preparation progresses. The advice of the Council's own conservation staff has been involved and including input from WSCC Archaeology Service.
- 1.22 South Downs National Park are concerned that clearer reference must be made to the landscape setting considerations of the nationally designated SDNP in the reasons for discounting sites and further development of the DPD and supporting evidence and should also include close engagement with SDNP.
- 1.23 West Sussex County Council (WSCC) comment that 6 of the 8 sites fall within Policy 9 Minerals Safeguarding zones (West Sussex Minerals Local Plan 2018) and should be the subject of consultation with WSCC. The new site ARU\_HELAA 046b Land at Little Meadow Yapton falls outside of this zone.
- 1.24 Additional highway comments are made by WSCC on sites in the rejected sites list, should they be reconsidered. This relates to ensuring the on-line improvements to the A259 between Bognor Regis and Littlehampton are safeguarded as part of any assessment evidence. An objection is also made to site ARU\_NS\_1 The Caravan Site as it falls within flood zone 3. Finally, more should be made of the potential opportunity for sites in terms of ecological enhancement and net biodiversity gains e.g. through tree and hedge planting.
- 1.25 Southern Water have advised that 5 of the proposed existing sites for intensification/expansion are not served by the water sewerage network; Aldingbourne Farm Shop (AL4714); Nyton Stables (ARU046); Limmer Pond Stables (ARU049); The Caravan Site north of New Road (ARU NS 1) and so alternative arrangements may be needed.
- 1.26 The Council's response is that: -
  - Sites within the minerals safeguarding zones will need to adhere to policy requirements but this does not necessarily preclude development (e.g. some Strategic Allocational fall within the minerals safeguarding zones);
  - The 8 proposed sites are largely existing small sites involving intensification or limited expansion - not involving significant land take - the proposed new site ARY\_HELAA 046b is not affected by minerals safeguarding;
  - Any applications will need to demonstrate compliance with all relevant development plan policies;
  - That WSCC will continue to be closely involved in site allocations going forward;
  - Highway safety and infrastructure considerations need further

- consideration for some sites with both Highways England and with WSCC;
- Heritage assessment and archaeology has been accounted for but needs clearer and ongoing presentation in the evidence as the DPD progresses;
- Appropriate references to the purposes and status of the SDNP and its landscape setting will also need to be addressed as the evidence progresses
- Evidence will need to be developed on how Waste Water services are to be accommodated;
- Opportunities for wildlife and habitat enhancements will be considered in accordance with the existing adopted Arun Local Plan and site-specific allocation policies.

### **Conclusion**

1.27 This G&T/IO document is the earliest stage of public consultation. Broadly, it is considered that there are no fundamental objections raised that cannot be resolved regarding the suggested 8 sites and the additional new site, as they progress, and policies and infrastructure requirements are worked up through additional evidence. However, there is a need for some checks on site planning status and additional consultation with the statutory bodies to: -

- Review the evidence on the legal and planning status of AL4714 Land at Aldingbourne Farm Shop appears and ARU040 'Land West of Brook Lane, south of A259 Angmering';
- Further engage with WSCC and Highways England on safety and infrastructure matters – in particular with regard ARU054 'The Old Barnes Arundel Road';
- Engage with the Environment Agency with regard to ARU\_NS\_1 'The Caravan Site' asserted to fall within flood zone 3;
- Engage with Southern Water on the current and anticipated demands placed though intensification and expansion on proposed sites.

### **Next Steps**

1.28 That subject to the further work to resolve objections, a Regulation 18 Draft DPD progress to public consultation in the Spring 2020.

## **2. PROPOSAL(S):**

That the report on the outputs of the public consultation be is noted and that officers investigate a) legal matters raised with regard to lawful use of sites and planning status and also delivery issues raised by Highways England and Southern Water as well the Environment Agency for potential flooding implications before determining whether preparation should progress to a draft progressing a Regulation 18 Draft G&T DPD for public consultation in the Spring 2020.

## **3. OPTIONS:**

Not to progress the Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD), would be contrary to policy commitment within the Adopted Arun Local Plan 2018 and published Local Development Scheme and therefore, risk planning by appeal and unplanned development.

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council	x	
Relevant District Ward Councillors	x	
Other groups/persons (please specify) Traveller community representatives and households, the settled community Parish and Town councils and 'duty to cooperate' bodies and authorities.	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment	x	
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
There are legal duties under the Equalities Act 2010 and in national planning policies and guidance to ensure that adequate deliverable and developable sites are provided to accommodate the needs of Gypsy and Traveller and Traveller Showmen over the plan period that meet the needs of sustainable development and ensuring that then amenity of the settled community are also accommodated.		

**7. REASON FOR THE DECISION:**

There is a policy requirement to progress a Gypsy and Traveller and Traveller showmen Development Site Allocations Development Plan Document within the adopted Arun Local Plan 2018 and within the Council's Local Development Scheme, in order to meet the objectively assessed needs for Gypsy and Traveller accommodation and therefore, provide a sound development plan for Arun District.

**8. BACKGROUND PAPERS:**

1. Planning Policy Sub-Committee 27 February 2019: Agenda Item 13 Gypsy and Travellers – Issues and Options:-





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**Appendix 1: Summary of Representations and ADC proposed Response.**

Response Reference	Name/Agent	Comment Summary	ADC Response/Proposed Change to DPD
GT Summer 20182	Mr Tony Cross (1099216)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p><i>Preference 1: ARU_NS_1 The Caravan Site, North site of New Road A259, Rustington.</i></p>	Noted. However, no evidence or explanation is provided in support of this position.
		<p><i>Q3. What other site options might there be (if any)?</i></p> <p><i>No comment.</i></p>	Noted.
		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p><i>Yes.</i></p>	Noted. However, no evidence or explanation is provided in support of this position.
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p><i>No.</i></p>	Noted. However, no evidence or explanation is provided in support of this position.
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p><i>Meeting Needs Section 4 - Monitoring. Table 8 Objectives &amp; Indicators does not seem to contain any criteria for the good and effective management of the Traveller site. Travellers</i></p>	No change. Planning conditions may regulate occupancy levels and durations and types of

		would welcome use of a site which was well managed/tidy and minimise wasteful use of resources.	land use activity however. site operational matters will be regulated by licensing. Ensuring that the Table 8 objectives are delivered will help to set a framework for sustainable and successful sites that meet the needs of occupiers as well as the settled community and thereby encourage good occupier practices.
GT summer 20184	Cllr R Kissell (616965)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>b) An evidence document</i></p> <p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>There needs to be sites for travellers to camp at.</p>	Noted.
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>Failure to use authorised sites would require measures to ensure any cost arising from unauthorised encampments must be recouped.</p>	<p>Noted. The planning system must ensure that needs are addressed in a sustainable way which will encourage occupation at the right locations and types of site through making suitable sites available.</p> <p>There are other regulatory and legal powers that the authority has together with other agencies to address issues arising from unauthorised encampments.</p>
GT summer 20185	Mrs Wendy Corney (614294)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p>	



		<p>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</p> <p>Concern that the majority of sites proposed are in the Aldingbourne Parish Council area of the Council, or in the very near vicinity. Unfair and not an even distribution across the District. The west is already facing development pressures and there are incidences of unauthorised encampments and concern about lack of management and consequent impact on the settled community.</p>	<p>No change/Action.</p> <p>The Council has commissioned an extensive evidence base on the needs of Gypsy and Traveller households and assessed potential site options through reviewing existing sites and other potential allocations against criteria set out in national guidance (e.g. PPST 2015) including a sustainability appraisal and by inviting ideas for any other potential sites through two separate 'call for sites'. The distribution of existing sites reflects the sources of available supply.</p>
GT Summer 20187	Mr Keith Meadmore (1099222)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</p> <ol style="list-style-type: none"> <li>1. Insufficient evidence in the DLP report on occupancy/utilisation levels and seasonal factors against projected requirements and usage. Are the present sites 100% occupied?</li> <li>2. There is little evidence to indicate coordination of district and county council strategies and actions for effective coordinated planning and this should be addressed in the next stages.</li> <li>3. A full financial specification and analysis should be incorporated in the next publication covering costs of existing and setting up new sites (both authorised and unauthorised) and likely annual maintenance and operating costs.</li> </ol>	<p>No change/Action.</p> <p>The Council has followed national policy and regulations in evidencing the needs of, and planning fairly and positively for, Gypsy &amp; Traveller and Traveller Showpeople households and accordingly set pitch and plot targets (Planning Policy for Traveller Sites: PPST 2015: paras 3, 4, 7 and 10 - and Annex1 sets out the definition of Gypsy</p>

		<p>4. Funding and budgeting information needs clarification and more guarantees surrounding these sources of funding for delivering/maintaining sites.</p> <p>5. There is little consideration as to what obligations site users should have towards maintaining and servicing sites and this needs to be covered in the next publication or explained by ADC.</p>	<p>and Traveller household types).</p> <p>The PPST 2015 must be considered with the NPPF 2019 and the housing size, type and tenure needs of different groups assessed and planned for (including travellers) with specific deliverable sites paragraph 4, 61 and 73</p> <p>Authorities must also consider the implications of their duties under the Equality Act 2010, including the Public Sector Equality Duty (Planning Practice Guidance 2019 para Paragraph: 001 Reference ID: 67-001-20190722)</p> <p>In particular the DPD evidence includes a joint Gypsy &amp; Traveller Accommodation Needs Assessment 2018 which included household interviews on the circumstances of families and their current and future needs, Duty to Cooperate evidence with WSCC (including coordinating and collectively reviewing WSCC and ADC owned sites) and adjacent local planning authorities, supply of available sites and commitments (planning permissions).</p> <p>A site Identification Study Also considered two call for sites, HELAA and WSCC and ADC sites (including coordinating and collectively reviewing WSCC and ADC owned sites).</p> <p>The allocation of sites for pitches or plots is the primary way that the</p>
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			<p>Council can meet defined pitches needs. This can take a variety of forms, including the provision of additional pitches on existing authorised sites, the provision of sites on previous sites, and the allocation of potential new sites to provide pitches. Existing sites proposed for intensification and expansion are unlikely to involve the same scale of costs for accommodation of new sites.</p> <p>On site operational matters are subject to separate licensing and landlord arrangements.</p>
GT Summer 20188	Barnham & Eastergate Parish Council (613338)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: ARU051 Dragonfly, Eastergate Lane.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>Barnham &amp; Eastergate Parish Council had no objection to any of the sites identified within the Barnham &amp; Eastergate Parish boundary. They had no comments to make on any other issues within the document.</p>	<p>Noted.</p>

<p>GT Summer 20189</p>	<p>Bersted Parish Council (1098152)</p>	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: AL4714 Land at Aldingbourne Farm Shop.</p> <p>Preference 2: ARU031 Fieldview, Junction Common Mead Land and Pagham Road</p> <p>Preference 3: ARU051 Dragonfly, Eastergate Lane.</p> <p>Preference 4: ARU046 Nyton Stables, Nyton Road</p> <p>Preference 5: ARU_NS_1 The Caravan Site, North site of New Road A259, Rustington.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p> <p>Noted – as above.</p> <p>Noted – as above.</p> <p>Noted – as above.</p> <p>Noted – as above.</p>
		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>Yes.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>Yes.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>

<p>GT Summer 201810</p>	<p>Southern Water (1106288)</p>	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q3. What other site options might there be?</i></p> <p>Southern Water is the statutory wastewater undertaker for the whole of Arun District, and additionally supplies water to the eastern half. Having regard to Policy H SP5, criterion 3 (h) which states that the site' be served (or be capable of being served) by an adequate water supply and appropriate means of sewage disposal' we would inform the council that the following sites are not currently served by Southern Water's sewerage network; Land at</p> <ul style="list-style-type: none"> <li>• Aldingbourne Farm Shop (AL4714),</li> <li>• Nyton Stables (ARU046)</li> <li>• Limmer Pond Stables (ARU049)</li> <li>• The Caravan Site north of New Road (ARU NS 1),</li> </ul> <p>Therefore, alternative arrangements may be needed for these sites.</p>	<p>Agreed. Any allocation of additional capacity at existing or new sites for pitch and plot provision will need to be in accordance with Policy H SP5 (h). This will require the commissioning of supporting infrastructure feasibility and viability evidence in order to make a sound allocation and in determining any planning application.</p>
<p>GT Summer 201811</p>	<p>Historic England (852419)</p>	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>ARU031 - Fieldview, Junction Common Mead Land and Pagham Road: the site is adjacent to the grade II listed Rookery Farmhouse, and the potential impacts of the development on the setting of the heritage asset should be assessed.</p>	<p>Agreed – such an assessment would form part of proposing any allocation or planning application. However, it should be noted that the site is an existing caravan site self-contained within existing tree and hedgerow planting (with the exception of the frontage onto Pagham Road). The proposed intensification of caravan pitches of a similar height</p>

		<p>ARU54 - The Old Barn, Arundel Road: potential for limited impact on views from Westergate House (grade II) should be assessed.</p> <p>Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the Development Plan Document, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 185). You should also consult the West Sussex County Archaeology Service for advice on archaeological resources, including information retained on the Historic Environment Record.</p>	<p>would be in situ and so there should be little or no additional impact in accordance with the Site Identification Study (Final report April 2019) Part b Assessment Matrix.</p> <p>Agreed – such an assessment would form part of proposing any allocation or planning application. However, it should be noted that (with the exception of the frontage onto the A27) the site is fairly well contained by surround tree planning along the boundary to the east (including bunding) and to the north. The site is also of sufficient size to accommodate provision in a sympathetic configuration and so there should be little or no additional impact in accordance with the Site Identification Study (Final report April 2019) Part b Assessment Matrix.</p> <p>Noted. Specialist officer consultation and proformas completed on the sites with comments from the Principal Conservation Officer are contained in Appendix D of the Site Identification document. The County archaeologist has been part of the officer consultation undertaken in March 2019 including other services and officers of WSCC.</p>
GT Summer 201812	Bilsham Manor (616929)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p>	

		<p>a) <i>The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: AL4714 Land at Aldingbourne Farm Shop.</p> <p>Preference 2: ARU046 Nyton Stables, Nyton Road</p> <p>Preference 3: ARU_NS_1 The Caravan Site, North site of New Road A259, Rustington.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p> <p>Noted. However, no evidence or explanation is provided in support of this position.</p> <p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q3. What other site options might there be?</i></p> <p>Object to site ARY-HELAA-46b - Land at Little Meadow, Yapton – not suitable - too close to existing residential properties and sited onto a very poor junction between Grevatts Lane West and Bilsham Road with extremely limited visibility. IF there is any need for a further site in the Yapton area it would be much better that it be by way of a limited extension to the existing site at ARU030, Ryebank Caravan Park, Yapton Road (see answer to Q5 below).</p>	<p>Noted. The Council will engage with WSCC before proceeding on this site however, WSCC has raised no objection to this proposed site which has also been subject to earlier engagement on the proposed sites list.</p>
		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>Yes, provided it does not have an adverse effect on neighbouring properties.</p>	<p>Noted. Existing policies within the Adopted Arun Local Plan 2018 provide criteria for assessing proposals to ensure that such issues of impact on amenity and the settled community will be taken into account and protected.</p>

		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>No.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>Any sites need to adequately protect the amenities of existing residential properties.</p>	<p>Noted. Existing policies within the Adopted Arun Local Plan 2018 provide criteria for assessing proposals to ensure that such issues of impact on amenity and the settled community will be taken into account and protected.</p> <p>The G&amp;T DPD will also provide adequate guidance on such matters specifically addressing each allocated site for Development Management purposes.</p>
GT Summer 201813	South Down National Park (950808)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q3. What other site options might there be?</i></p> <p>ARU054 – The Old Barns, Arundel Road is supported in principle (given existing permission including unimplemented) subject to further details - however the allocation policy should make clear that the site falls within the setting of the SDNP and would need to have obligations to the purposes and special qualities of the SDNP as set out in Section 62 of the Environment Act 1995.</p> <p>Support rejection of site ARU_WSCC_7 - Land at Fairmile Bottom Lane, Madehurst which is within the SDNP open countryside and an</p>	<p>Agreed.</p> <p>Noted. No change necessary - the site falls outside of the jurisdiction</p>



		SSSI. Reference should also be made to the SDNP as a reason for rejection and the site would in any case fall within the responsibility of the SDNPA as the planning authority for that area.	of the Arun Local Planning Authority area – however, its inclusion within the evidence was necessary as part of the initial list of site which included existing sites, sites going through planning and public sector owned land (Arun DC and WSCC land).
		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>No Comment.</p>	Noted.
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>Concern that the National Park designation (and regard to its setting) appears to have been omitted. See comments re ARU_WSCC_7 above. Landscape assessment should refer to the SDNP as a nationally designated area, a serious omission which should be remedied as the evidence is evolved going forward.</p> <p>SDNP would welcome ongoing engagement on this issue and further stages of the DPD.</p>	<p>Agreed. The landscape references should be to the SDNP as appropriate and will be addressed in any further assessments. However, the sites is an existing site and there are strong polices within adopted Arun Local Plan 2018 to safeguard landscape impacts as well as the important setting of the nationally designated SDNP. Formulation of site specific policies may also provide protection. Please see comments above in relation to site ARU_WSCC_7.</p> <p>Noted. ADC will continue to consult and engage with the SDNP on this DPD preparation.</p>
GT Summer 201814	Store Property Investments (873479)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>b) An evidence document</i></p>	

		<p><i>Q2. Has the Council correctly evidenced the future needs of the Gypsy and Travellers and Travelling Showpeople community?</i></p> <p>The evidence is factually inaccurate, contending that through information during a recent application and appeal [APP/C3810/W/17/3185128 Land West of Brook Lane, south of A259 Angmering] that the legal use of the site [ARU040 ] is not for G+T. Therefore, objection (as contained in attached documents).</p>	<p>Noted. The contention is that site ARU040 within the evidence base should not be counted towards existing G&amp;T supply. The two existing personal planning permissions for Gypsy &amp; Traveller accommodation on part of the appeal site forming ARU040 have lapsed because the subject individuals have vacated and found alternative accommodation elsewhere. The appeal allowed for alternative development therefore, does not impact on G&amp;T needs in terms of lost G&amp;T accommodation and policy requirement for alternative replacement provision because the lawful use established by the allowed appeal for a mixed-use development. The council will need to review the legal position and the position as regards net impact on G&amp;T requirements with respect to the two individuals and their current status i.e. whether they meet the G&amp;T definition and whether they have permanently ceased to travel .</p>
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>No.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p>	<p>See response to Q2 above.</p>

		Site ARU040 should not be considered to be part of the Council's supply for G+T, in line with the points made in attached documents.	
GT Summer 201815	West Sussex County Council (1220484)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: ARU_NS_1 The Caravan Site, North site of New Road A259, Rustington.</p>	<p>Noted. However, the response is qualified as an objection by WSCC because it is asserted as falling within flood zone 3. The Council's evidence is that the existing site may be affected by zone 3b in part of the of the northern boundary and by 3a and exceptions test and SFRA2 would be required.</p>
		<p><i>Q3. What other site options might there be?</i></p> <p>Ensure account taken of mineral safeguarding at next stages, as well as comments relating to Appendix 2 , specifically relating to Site ARU030 and ARU_NS_1 plus inclusion of ecology. See attached comments.</p>	<p>Noted. Any proposed allocations will need to take into account mineral safeguarding and bio-diversity constraints. However, most proposals involve intensification in situ on established G&amp;T sites.</p> <p>ARU030. This authorised public site (Ryebank Caravan Site – 12 pitches) has been discounted at stage 2 Assessment as having no further capacity (Table 9 - Site Identification Study - Final report April 2019).</p> <p>ARU_NS_1. This site north of New Road A259 (north of the stables) has</p>

			retrospective planning permission being implemented for 1 pitch with capacity for 1 additional pitch in years 6 to 10 (Table 16 - Site Identification Study - Final report April 2019). The assessment suggests need for mitigation of flood, noise, residential amenity and highway constraints. Further Appendix D, site proforma under WSCC Minerals and Waste, states that this site is not in the mineral safeguarding zone.
		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>No comment.</p>	Noted.
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>No.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p> <p>ARU_HELAA_46b (Bilsham Corner – 46b being the specific part of HELAA site 46 being promoted by the owner for G&amp;T pitches or Traveller Showmen plots)</p>
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>Part of comments for site not being included come from LLFA on flooding vulnerability for this use.</p>	Noted.

<p>GT Summer 201816</p>	<p>Aldingbourne Parish Council</p> <p>Adams Henry (613342)</p>	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: AL4714 Land at Aldingbourne Farm Shop.</p> <p>Preference 2: ARU044 Wyndham Acres, Northfields Lane.</p> <p>Preference 3: ARU049 Land at Limmer Pond Stables, Church Road.</p>	<p>Partly accepted. However, supporting representation provided clarifies this is an objection based on cumulative impact on amenity/infrastructure and permission lapsed or unlawfully implemented. The Council will review the planning status of this site.</p> <p>Noted. However, supporting representation provided clarifies this is an objection based on cumulative impact on amenity/infrastructure and prone to flood risk. The Council's evidence is that the existing site is not in a flood zone but in an area affected by ground water flooding. Any planning permission would need to adequately address this.</p> <p>Noted. However, supporting representation provided clarifies this is an objection based on cumulative impact on amenity/infrastructure. The Council's GTAA 2019 and Site Identification Study have evidenced the need for and supply of sites to meet G&amp;T</p>
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		<p>Preference 4: ARU054 The Old Barnes, Arundel Road.</p> <p>Preference 5: ARU046 Nyton Stables, Nyton Road.</p>	<p>requirements through an extensive discounting process across the district including Sustainability Appraisal.</p> <p>Noted. Noted. However, supporting representation provided clarifies this is an objection based on cumulative impact on amenity/infrastructure. The Council's GTAA 2019 and Site Identification Study have evidenced the need for and supply of sites to meet G&amp;T requirements through an extensive discounting process across the district including Sustainability Appraisal.</p> <p>Noted. Noted. However, supporting representation provided clarifies this is an objection based on cumulative impact on amenity/infrastructure. The Council's GTAA 2019 and Site Identification Study have evidenced the need for and supply of sites to meet G&amp;T requirements through an extensive discounting process across the district including Sustainability Appraisal.</p>
		<p><i>Q3. What other site options might there be?</i></p> <p>Do not suggest any alternatives but object to these sites for G+T use on the basis of potential cumulative impacts on infrastructure of additional plots and pitches. This has not been assessed by ADC. Unclear how the promoters of strategic sites are going to incorporate the requirement (g) of H SP therefore, ADC has failed to clearly demonstrate a lack of reasonable alternatives to justify the potential additional sites in Aldingbourne Parish.</p>	

		<p><i>Q4. Should the Council focus meeting needs based on intensifying and expansion of existing sites?</i></p> <p>Object to the further intensification of these sites while the lawfulness of their planning status is unclear and specifically discuss Site AL4714 (Aldingbourne Farm Shop) and Site ARU044 (2 Wyndham Acres) as contained within attached letter.</p>	
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>No.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>A number of proformas are missing from Appendix E of the Site Identification Study.</p>	
GT Summer 201816	Highways England (1154760)	<p><i>ISSUES AND OPTIONS G and T DPD July 2019</i></p> <p><i>Subject:-</i></p> <p><i>a) The DPD</i></p> <p><i>Q1. In proposing to identify the site options towards meeting the evidence needs for Gypsy &amp; Traveller and Travelling Showpeople and their particular requirements taking into account national and local policy – has the Council identified reasonable site options to accommodate these needs as listed below? Tick all the ones that you consider to be a reasonable site option.</i></p> <p>Preference 1: ARU054 The Old Barnes, Arundel Road.</p>	<p>Noted. However, no evidence or explanation is provided in support of this position.</p>
		<p><i>Q3. What other site options might there be?</i></p> <p>No suggested alternative. The focus is the strategic road network being a national asset in terms of providing long-term operation and</p>	<p>Noted.</p>

		integrity e.g. only concerned with proposals that have the potential to impact the safe and efficient operation of the A27.	
		<p><i>Q5. The only potential additional new site that appears to provide some suitability towards meeting G&amp;T need, is the HELAA site 46. Should the Council include this site as a potential option?</i></p> <p>Yes.</p>	Noted. However, no evidence or explanation is provided in support of this position.
		<p><i>Q6 Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy &amp; traveller needs in preparing this Gypsy &amp; Traveller and Travelling Showpeople DPD?</i></p> <p>HE does not object to the addition of an additional single plot at ARU054 (The Old Barn, Arundel Road). Large slow moving HGV vehicles with fairground equipment are using the access and being stored at the site. Slow to accelerate, further intensification is likely to require a carriageway acceleration splay and effectively cover the existing overrun area of verge. This will need to be borne in mind by the Council if further use is made of the site and its access.</p>	Noted. A feasibility and viability study will be necessary in order to demonstrate the deliverability of this proposed allocation.



ID	Q1							
	<b>AL4714</b>	<b>ARU031</b>	<b>ARU044</b>	<b>ARU051</b>	<b>ARU046</b>	<b>ARU049</b>	<b>ARU054</b>	<b>ARU_NS_1</b>
	Aldingbourne Farm shop	Fieldview Pagham Road	Land East Wyndham Acres	Dragonfly Eastergate Lane	Nyton Stables	Limmer Pond Stables	The Old Barnes	The Caravan Site
<b>Note blank cells indicate no response was made.</b>								
GT Summer 20182 Mr Tony Cross (1099216)					No			1 <sup>st</sup> Preference
GT summer 20184 Cllr R Kissell (616965)								
GT Summer 20185 Mrs Wendy Corney (614294)	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne	Object to any in Aldingbourne
GT Summer 20187 Mr Keith Meadmore (1099222)								
GT Summer 20188 Barnham & Eastergate Parish Council (613338)				1 <sup>st</sup> Preference				
GT Summer 20189 Bersted	1 <sup>st</sup> Preference	2 <sup>nd</sup> Preference		3 <sup>rd</sup> Preference	4 <sup>th</sup> Preference			5 <sup>th</sup> Preference

Parish Council (1098152)								
GT Summer 201810 Southern Water (1106288)	Not served by Southern water sewerage network				Not served by Southern water sewerage network	Not served by Southern water sewerage network	Not served by Southern water sewerage network	Not served by Southern water sewerage network
GT Summer 201811 Historic England (852419)		Potential Heritage impact should be assessed (Rookery Farm House Grade II)					Potential Heritage impact should be assessed (Westergate House Grade II)	
GT Summer 201812 Asham Manor (616929)	1 <sup>st</sup> Preference				2 <sup>nd</sup> Preference			3 <sup>rd</sup> Preference
GT Summer 201813 South Down National Park (950808)								
GT Summer 201814 Store Property Investments (873479)								
GT Summer 201815 West Sussex County Council (1220484)	Within Sharp Sand Mineral Safeguarding Zone		Within Sharp Sand Mineral Safeguarding Zone	Within Sharp Sand Mineral Safeguarding Zone	Within Sharp Sand Mineral Safeguarding Zone	Within Sharp Sand Mineral Safeguarding Zone	Within Sharp Sand Mineral Safeguarding Zone	1 <sup>st</sup> Preference  Considered to fall within flood zone 3 and therefore,

								should be excluded.
GT Summer 201816 Aldingbourne Parish Council (613342)  Adams Henry (1223799)	Object (amenity and cumulative impact). Permission has elapsed or unlawfully implemented.		Object (amenity and cumulative impact)  Prone to flood risk		Object (amenity and cumulative impact)	Object (amenity and cumulative impact)	Object (amenity and cumulative impact)	
GT Summer 201817 Highways England (1154760)							1 <sup>st</sup> Preference	

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ID	<b>Q2</b> Has the Council correctly evidenced the future needs of the Gypsy and Travellers and Travelling Showpeople community?	<b>Q3</b> What other site options might there be (if any)?	<b>Q4</b> Should the Council focus meeting needs based on intensifying and expansion of existing sites?	<b>Q5</b> The only potential additional new site that appears to provide some suitability towards meeting G&T need, is the HELAA site 46. Should the Council include this site as a potential option?	<b>Q6</b> Are there any other issues and options and/or additional comments that the Council should consider in addressing the plan making for the provision of Gypsy & traveller needs in preparing this Gypsy & Traveller and Travelling Showpeople DPD?
<b>Note blank cells mean no response was made.</b>					
GT Summer 20182 Mr Tony Cross (1099216)		No comment.	Yes.	No.	
GT Summer 20184 Mr R Kissell (616965)					Failure to use authorised sites would require measures to ensure any cost arising from unauthorised encampments must be recouped.
GT Summer 20185 Mrs Wendy Corney (614294)			Concern that majority of sites is within the Parish unfair distribution – generating existing amenity issues		
GT Summer 20187 Mr Keith Meadmore (1099222)			No.		Insufficient evidence on occupancy/utilisation; strategic coordination with WSCC; financial

					implications and budget provision for delivery; occupier obligations to maintain sites etc.
GT Summer 20188 Barnham & Eastergate Parish Council (613338)					Barnham & Eastergate Parish Council had no objection to any of the sites identified within the Barnham & Eastergate Parish boundary. They had no comments to make on any other issues within the document.
GT Summer 20189 Bersted Parish Council (098152)			Yes.	Yes.	
GT Summer 201810 Southern Water (1106288)		The following sites are not currently served by Southern Water's sewerage network; Land at <ul style="list-style-type: none"> <li>• Aldingbourne Farm Shop (AL4714),</li> <li>• Nyton Stables (ARU046)</li> <li>• Limmer Pond Stables (ARU049)</li> <li>• The Caravan Site north of New Road (ARU NS 1),</li> </ul>			

		Therefore, alternative arrangements may be needed for these sites.			
GT Summer 201811 Historic England (852419)					<p>ARU031 - Fieldview, Junction Common Mead Land and Pagham Road: the site is adjacent to the grade II listed Rookery Farmhouse, and the potential impacts of the development on the setting of the heritage asset should be assessed.</p> <p>ARU54 - The Old Barn, Arundel Road: potential for limited impact on views from Westergate House (grade II) should be assessed</p> <p>Historic England would strongly advise that the Council's own conservation staff are closely involved.</p> <p>You should also consult the West Sussex County Archaeology Service for advice</p>
GT Summer 201812 Bilsham Manor		Object HELAA site 46b Land at Little	Yes. (provided protects residential	No.	Protect Residential amenity

(616929)		Meadow, Yapton residential amenity, highway safety.  Preference is limited extension to ARU030 Ryebank Caravan Park	amenity)		
GT Summer 201813 South Down National Park (950808)		ARU054 The Old Barnes is supported in principle subject to SDNP setting obligations  Object to ARU-WSCC_7 Land at Fairmile Bottom Madehurst – within SDNP	No comment.		Landscape assessment should refer to the SDNP nationally designated area.  Welcome ongoing engagement.
GT Summer 201814 Store Property Investments (873479)	Inaccurate  Legal Appeal  Sites is not a G&T Site			No.	Site ARU040 Not part of supply for G&T in line with appeal
GT Summer 201815 West Sussex County Council (1220484)		Account for Mineral Safeguarding and ecology  Also, Appendix 2 comments  Specifically, ARU030	No comment.	No.	Part of comments for site not being included come from LLFA on flooding vulnerability for this use.*



		and ARU_NS_1*			
GT Summer 201816 Aldingbourne Parish Council (613342)  Adams Henry (1223799)		Do not suggest any alternatives but object to these sites for G+T use on the basis of potential cumulative impacts on infrastructure of additional plots and pitches. This has not been assessed by ADC – failed to show lack of reasonable alternatives.	Object to the further intensification of these sites while the lawfulness of their planning status is unclear and specifically discuss Site AL4714 (Aldingbourne Farm Shop) and Site ARU044 (2 Wyndham Acres) as contained within attached letter.	No.	A number of proformas are missing from Appendix E of the Site Identification Study.
GT Summer 201817 Highways England (154760)		No suggested alternatives. The focus is the strategic road network e.g. impact on the safe/efficient operation of the A27.	Yes.		No objection to ARU054 however, safe acceleration splay and overrun will need consideration arising from intensification of slow HGV egress/ingress

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