

Name/Agent	Comment Summary	ADC Response/Proposed Change to DPD
Natural England	Agree with HRA LSE report conclusion that there would be no likely significant effect to result from the DPD	Noted.
Environment Agency	<p>Note that the proposed intensification at the ARU_NS_1 remains and refers to the Statement of Common Ground signed with the Authority.</p> <p>Support general principle of G&T DM1 with relation to the comments on provision of foul sewage water disposal, SUDS provision and features, along with the inclusion of natural features to secure net biodiversity gains.</p> <p>Wish to reinforce that they are not responsible for making sure the developer “makes adequate on-site provision of septic tank/cess pit storage of foul water capable of long-term maintenance.”</p> <p>Further consider that proposed inclusion of criteria point b. does not sufficiently address the concerns expressed in the Statement of Common Ground and so maintain the position expressed in previous comments and the statement.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. The policy wording in the opening paragraph preceding clause h. states “...in consultation with.... The responsibility will be with the developer and the local authority.</p> <p>Not accepted. Arun acknowledges the concern within the joint Statement of Common Ground and the need to continue to work with the LLFFA and EA to resolve the issue. Arun is of the view that the site history with the existing grant of a planning permission on the site following a site level</p>

		Floods Risk Assessment which provides a higher degree of resolution on the ground compared to generic flood risk mapping (particularly where sites are on the margin of flood contours) demonstrates that the site in question is not in FZ3 as indicted in the G&T site Identification Study. However, further work will be undertaking to resolve this proposed inclusion with the LLFA and EA before the site is progressed as part of the DPD.
Historic England	<p>Note the retention of ARU031 and ARU54 previously highlighted in previous comments, where it was expressed that designated assets may be affected.</p> <p>Strongly advise that the Council's conservation staff are closely involved in any proposals, as they are best placed to comment on any impacts to designated sites in the vicinity and comment that these are made without prejudice to any proposals that may come forward. EA</p> <p>The HRA LSE report falls outside of EAs remit and competency but EA defer to comments provided by Natural England (NE)</p>	<p>Noted. Policy wording in GT DM1 address these concerns. (i.e. proposed policy G&T DM1 criterion e.)</p> <p>Noted. The Council's Heritage Officer is closely engaged with the proposed allocations and policy mitigation required.</p> <p>Noted. See response to EA comments.</p>
Highways England	Highways England has reviewed the Arun Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (G&T DPD) Preferred Options and new supporting documents: G&T Climate Change Flood Map, and HRA LSE Screening Report.	

	<p>Highways England was consulted for the Issues and Options stage of consultation, and provided a response dated 2 September 2019 as attached, outlining concern with the access to site ARU54 (The Old Barns, Arundel Road) if taken forward. This approach was subsequently agreed via the attached Statement of Common Ground dated 1st October 2020, in which it was agreed:</p> <p><i>“The development management approach for ARU054 The old Barnes, Arundel Road would need to address: -</i></p> <p><i>1. Adequate access onto the highway located and to at a standard agreed with the Highway Authority (WSCC) and Highways England to ensure safety ingress and egress onto and off the highway and adequate visibility, overrun and acceleration splays.”</i></p> <p>Therefore, provided that this is considered and addressed accordingly, Highways England has no further comments on the consultation.</p>	<p>Noted. ADC consider that the representations raised do no amount to insurmountable constraints. A delivery and viability study is being commissioned to demonstrate the safe and viable access to the site. The proposed policy G&T DM1 will ensure that these requirements are secured to enable development (i.e. proposed policy G&T DM1 criterion e.)</p>
<p>Barnham & Eastergate Parish Council</p>	<p>The Parish Council’s Planning & Environment Committee consider that comment is only needed on the new site allocation on Bilsham Lane, in Yapton and agreed to raise no objection on this.</p> <p>They went on to note that as a parish they have their fair share of sites and so would not wish to see any alternative sites being put forward in their parish.</p>	<p>Noted.</p> <p>Noted. It is national and local policy that the authority meets its obligations to make provision for identified need. The proposed distribution of provision reflects evidence studies on suitability, availability, capacity, achievability and sustainability criteria for site selection.</p>

Middleton on Sea Parish Council	Agreed unanimously that there should be no extension to the current site in Yapton. Middleton on Sea, which borders this site, is not large enough to support an expansion.	Noted. The proposed broad location for a provision located at Little Meadow Bilsham Corner is more than 250 m from existing Ryebank Caravan Park which is an existing G&T site assessed but not considered suitable for intensification in the Site Identification Study or Sustainability Appraisal evidence study.
Sussex Wildlife Trust	<p>Sussex Wildlife Trust recognises the importance of a plan led system as opposed to a developer led one to make certain that the DPD plans properly for the natural capital needed in the District and ensures development is truly sustainable.</p> <p><u>Policy G&T DM1</u> SWT is pleased to see that this policy includes a requirement to avoid impacts on biodiversity and to secure a net gain within any new or extended site. The priority should be for onsite delivery, but where this is not possible, ADC should ensure that there is a strategic approach to any offsite delivery contributing to the District's Nature Recovery Network. We also support the requirement for an ecological survey.</p>	<p>Noted.</p> <p>Noted. Policy G&T DM1 criteria seek on site provision for biodiversity gains on 'intensification' sites (secured via s.106) but may be subject to feasibility and viability. This is likely to be more achievable and viable if sites are expanded or new sites proposed but this is not the policy approach (except for the broad location at Little Meadow Bilsham). Off site provision will be subject to CIL where development relates to the creation of a new building (Planning Act 2008, s209) or changes to an existing building. Gypsy and Traveller development and is unlikely to meet this definition involving the movement of caravans onto a site where CIL will not be payable. This will also be the case with the development of mobile home parks for non-Gypsy and Traveller households.</p>

	<p>SWT also strongly supports criteria h. This is especially important as a number of the site allocations are adjacent to water courses, particularly chalk streams and rifes. These habitats are extremely vulnerable to negative impacts from pollution and changes in water quality and quantity. ADC must ensure that these habitats are protected through the planning system.</p>	<p>Nevertheless CIL accrued from other development can be spent on necessary infrastructure to mitigate the impact of growth and this can include net biodiversity gains to address impacts arising from Gypsy & Traveller provision.</p> <p>Noted. These clarifications can be added to the supporting text.</p>
<p>West Sussex County Council (Officer Response)</p>	<p>1) Comments on Policy G&T DM 1</p> <p><u>Minerals and Waste Planning</u> - It is noted that reference is now made to mineral safeguarding which is welcomed.</p> <p><u>Development Management – WSCC Highways:</u> Previous highway comments have been sent to Arun DC as part of the background to the site selection process. Specific comments relate to Policy G&T DM 1 para. ‘d’ on page 30: The wording here should be amended as it suggests that all the sites would require overrun and acceleration splays, whereas the majority are unlikely to.</p> <p>It is suggested that the last line is amended to read “.....<i>highway including and adequate visibility splays, geometry and, where necessary, overrun and acceleration splays.</i>”</p> <p>Highways England previously requested a reference to the overrun and acceleration splays. If the above clarification is made to the DPD, Highways England will need to be</p>	<p>Noted.</p> <p>Accepted. Policy G&T DM1 wording to be amended accordingly.</p> <p>Accepted. Wording will be amended as proposed subsequent to liaison with WSCC and HE under ongoing the ‘Duty to</p>

	<p>consulted to ensure that the change is acceptable in order to ensure their previous wording request is still fulfilled with the proposed change.</p> <p><u>Sustainable Transport:</u> In previous comments, WSCC as Highway Authority raised the need for sites to be considered in accordance with sustainable transport criteria. Arun Local Plan Policy TSP1 does reference such matters however Policy G&T DM1 does not. It is recognised that development proposals will take account of policies in the Arun Local Plan 2018 (and other DPDs / neighbourhood plans) however it is suggested that it would be helpful to make some reference to sustainable transport criteria in this DPD.</p> <p>Lead Local Flood Authority (LLFA): It is requested that a new sub-paragraph to Policy G&T DM 1 is added to read:</p> <p><i>...consultation with ... <u>the Lead Local Flood authority to ensure that proposals are acceptable taking into consideration local flood risk from surface water and ground water and to ensure that proposed site drainage is compliant with adopted policy: The West Sussex LLFA Policy for the Management of Surface Water</u></i> https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf</p> <p>2) Site Comments</p> <p>Site: ARU_NS_1, North Side of New Road A259, Rustington</p> <p>The LLFA notes that notwithstanding earlier comments made in August 2019 (Issues and Options) and July 2020 (Draft Statement of Common Ground) with respect to the unsuitability of site ARU_NS_1, North Side of New Road A259, Rustington, on flood risk grounds, Table 6 JGTTA Gypsy & Traveller potential provision against residual need has included an additional 3 pitches for inclusion before 2036.</p> <p>The LLFA reiterates that this site is wholly within Flood Zone 3 and therefore requires the Sequential Test and Exception Test to be undertaken in accordance with National Planning Practice Guidance. No evidence could be found that this test has been undertaken in the DPD. If the site is made permanent, attention is drawn to paragraph 163 of the NPPF:</p>	<p>Cooperate and progress on Statements of common Ground.</p> <p>Accepted.</p> <p>Accepted. Accepted. Policy G&T DM1 wording to be amended accordingly.</p> <p>Not accepted. Arun acknowledges the concern within the joint Statement of Common Ground and the need to continue to work with the LLFFA and EA to resolve the issue. Arun is of the view that the site history with the existing grant of a planning permission on the site following a site level Floods Risk Assessment which provides a higher degree of resolution on the ground compared to generic flood risk mapping</p>
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	<p><i>“Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:</i></p> <p><i>e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan”.</i></p> <p>The emergency plan therefore needs to be assessed as part of the sequential / exception test process.</p> <p>3) Other Comments</p> <p><u>Public Rights of Way:</u> There is little mention of sustainability in relation to the sites. There is benefit to securing sustainable transport opportunities where possible, for new and existing sites, to tackle the reliance on the car and tackle the issues caused by this. Sustainable transport opportunities can in part be addressed through the PROW network in places, more emphasis should be placed on sustainable transport and PROWs as part of any future site development.</p>	<p>(particularly where sites are on the margin of flood contours) demonstrates that the site in question is not in FZ3 as indicted in the G&T site Identification Study. However, further work will be undertaken to resolve this proposed inclusion with the LLFA and EA before the site is progressed as part of the DPD.</p> <p>Noted. No change is needed. The site selection and assessment process through the site identification study and Sustainability Appraisal considers access to services and sustainable travel. The existing Arun Local Plan also has policies to assess the need for provision for and encourage sustainable travel in relation to development including for gypsy and traveller purposes. It is acknowledged that the needs of G&T communities for work and domestic purposes introduces a reliance on locations near to services yet discrete for social harmony, and to the strategic road network for motor vehicle and mobile caravans, plant and equipment.</p>
West Sussex County Council	<p>Set out that the following comments are provided from a landowner perspective.</p> <p><u>Tables 8 & 9 and para 9.0.9</u> Raise issues with covenants that would be breached by the proposed use at 3 sites by additional pitches. These are:</p>	<p>Noted. Arun District Council is extremely disappointed. WSCC have been consulted</p>

<p>(Asset Team)</p>	<p>a) ARU049 Land at Limmer Road Stables b) AL4717 Aldingbourne Farm Shop c) ARU046 Nyton Stables</p> <p>They suggest the solution that these sites are therefore removed in terms of intensification.</p> <p><u>G&T SP1</u> Site ARU_NS_1 The Caravan site is adjacent to land held by the County Council for the purpose of maintaining the highway. The site is compact and 2 new pitches proposed, so would be grateful to see a plan showing the location of any new pitches, to demonstrate they will not encroach on the adjoining WSCC owned land.</p> <p>Recommend that any intensification is therefore delayed subject to the further information above.</p>	<p>extensively on the proposed sites assessment and selection and this objection has not been raised previously in response to the Regulation 18 Issues & Options consultation. Before the DPD can progress Arun will work on this issue with WSCC to see whether other solutions can be found.</p> <p>Agreed. Policy wording in G&T DM1 criterion d. to be amended as underlined : “...and acceleration splays (<u>including safeguarding 3rd party land used for maintaining the highway</u>); Arun will work with WSCC accordingly to ensure that a buffer zone is marked on a site plan for the potential allocation.</p>
<p>South Down National Park (SDNPA)</p>	<p>Thanks the authority for addressing the issue of the geographical boundaries of the document as raised during the last consultation.</p> <p>Duty to Co-operate Support ADC’s continuing liaison with neighbouring authorities to ensure cross boundary strategic priorities are addressed and the following comments are generally taken with respect to those set out for the park. Generally they recognise the need to address the needs of the Gypsy and Traveller communities and support the principle of safeguarding and allocating sites in Arun, outside of the National Park to meet its identified need.</p> <p>Statement of Common Ground Acknowledge that a statement was agreed between the authorities on 1st October 2020 and refer to page 3 of that statement in terms of what was agreed with respect to modest sites with a summary of the allocations of the DPD and confirmation that SDNP has no</p>	<p>Noted.</p> <p>Noted.</p>

<p>issue with the sites included. However, SDNP expands on the position within the agreed statement:-</p> <p>Policy G&T SP1 The SDNPA welcomes mention of the park within point g. of the policy and that it is as agreed in the aforementioned statement.</p> <p>The Setting of the National Park Although none of the sites are within the National Park, some sites or site extensions are close to the National Park boundary, particularly ARU054 The Old Barns, which is proposed for intensification. The SDNPA would welcome policy wording for existing sites intended to be intensified to include criteria in regard to siting and layout of plots with regards minimising intrusion into the wider landscape, as well as from the SDNP and its sensitive landscape. We would also welcome wording that requires landscape impacts to be assessed, welcoming any further discussion in respect to this.</p> <p>Dark Night Skies In general, due to the domestic nature of the dwellings, it is unlikely that the lighting footprint of any allocation would result in any reduction in sky quality within the Downs. Provided that residents adopt domestic lamp options (see list below) that are reasonably consistent with SDNP recommendations, there should be little impact.</p> <p>In addition to little sky quality impact, any disruption of a dark landscape will also be small, due to the height of installation, which will reduce the visibility when compared to more typical permanent dwellings.</p> <p>In the event that area floodlighting is used, care should be taken to ensure that it is appropriate for use or avoided. To that end , any lighting should:</p> <ul style="list-style-type: none"> • Be downward pointing • Be 3000K colour temperature • Off when not needed • Domestic in nature (~1000 lumens) • Avoid area floodlighting – anything using 3000 lumens and above. 	<p>Noted.</p> <p>Agreed. Policy G&T DM1 includes criterion g. to address these concerns and amended as underlined will help to resolve: “... ”</p> <p>Agreed. Supporting text can add further clarification in this respect.</p> <p>Noted.</p> <p>Agreed. Supporting text can add further clarification in this respect.</p>
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	<p>Habitats Regulations Assessment</p> <p>The SDNPA note and is glad to see mention of the buffer zones set out in the report.</p> <p>If there are proposals which are yet to receive permission, then considering whether intensification would result in impacts on any commuting features is relevant and would require considering before ruling out LSE. We cannot be certain, due to our mapping, if any sites yet to have permission are within the 12km zone. We would welcome further discussion and clarification on whether the proposed sites without permission fall within this buffer. Reference is made to the Bat Protocol and its importance for Slindon Woods, which are known for barbastrelle bats using this woodland as a maternity roosts.</p> <p>Finally, the recently published People and Nature Network (PANN) (formerly known as the South Downs Green Infrastructure Framework) sets out how a wide range of partners can work to positively plan for nature and natural services within and around the protected landscapes of the south east. The PANN includes the Natural Capital Investment Area (NCIA) number 9 'Arun Blue-Gren Corridor' which comes into this area.</p> <p>Therefore, would welcome the opportunity to continue working with Arun on Green Infrastructure matters.</p>	<p>Noted. The existing sites for intensification are all within Arun and the Council's evidence base assessments and LSE which has been mapped and demonstrates that no future permissions will fall within this buffer and this has been agreed with the statutory bodies. Arun will continue to work with the SDNP to clarify this matter.</p> <p>Agreed. See response to Chichester District Council and proposed amended policy wording to proposed policy G&T DM1 c.</p>
<p>Chichester District Council (CDC)</p>	<p>Chichester District is supportive the DPD is seeking to meet the identified need for Arun in full.</p> <p>The Council notes that there are a number of sites within close proximity to the Arun-Chichester administrative boundary, and although the Council has no site specific comments to make, it wishes to ensure that any infrastructure implications which may impact upon Chichester District are mitigated for. The Council would also like to ensure that any landscape or environmental implications are mitigated for, including impacts on biodiversity and watercourses.</p>	<p>Noted.</p> <p>Noted. The proposed provision of net additional pitches and plots is modest over the plan period and in the first 5 years taking into account existing consents. The strategy is also based on existing sites with capacity for intensification (only 1 new broad location is proposed in south central Arun). Proposed policy G&T DM1 sets out criteria to ensure that adequate mitigation of impacts is addressed before permission is granted. Further work will be undertaken to address deliverability and viability</p>

	<p>The Council is proposing to introduce strategic wildlife corridors through its Local Plan Review, including a proposed corridor east of Chichester city. The proposed boundaries of the corridors can be seen in the Schedule of Proposed changes to the policies map document which accompanies the Preferred Approach plan here https://www.chichester.gov.uk/media/31059/Local-Plan-Review-2035---Schedule-of-proposed-changes-to-policy-map/pdf/Local_Plan_Review_2035_-_Schedule_of_proposed_changes_to_policies_map.pdf. The Council would wish to ensure that this is recognised and that adverse impacts on the functionality of the proposed corridors are avoided.</p>	<p>implications including necessary infrastructure mitigation. Arun will liaise closely under the duty to cooperate with Chichester District on any potential cross boundary considerations arising from this work.</p> <p>Agreed. The sites are existing sites for intensification within Arun (only 1 new broad location is proposed in south central Arun) and proposed policy G&T DM1 addresses ecology and biodiversity considerations and mitigation. However, for clarification, policy text pf criterion c. to be amended as underlined: “...ecology and natural feature (<u>including wider ecological networks and cross boundary corridors</u>) or achieves appropriate...”</p>
Mr & Mrs Goddard	<p>Expresses the view that Councils are being placed under pressure from Government to accommodate and support the needs of this minority group and that no views expressed will influence anything.</p>	<p>Not accepted. The Council has followed national policy and regulations in evidencing the needs of, and planning fairly and positively for, Gypsy & 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 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</p>

	<p>Expresses that the small community of Marsh Lane, Easthampnett have had direct experience retrospectively of the Nyton Stables site. Then goes on to provide long</p>	<p>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>Planning policy addresses inclusive needs across a broad spectrum. The assessment of Objectively Assessed Needs covers both the settled community and transient communities, people of different cultures and faiths and beliefs and includes making provision to meet 'special needs' for example, provision for elderly, infirm and people with a disability or health needs, the needs of children and younger people and disadvantaged households (e.g. affordable housing).</p> <p>Noted. See below.</p> <p>Noted. Planning conditions may regulate occupancy levels and durations and types of land use activity and on-site mitigation including landscaping provision.</p> <p>Enforcement will take place where conditions are breached following survey</p>
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	<p>explanation about the fact that boundary landscaping that had been planted under the original maintenance plan on the pp had failed and the fact this has only been replanted in April 2020.</p> <p>Expresses that consider LPAs have a duty to ensure that conditions applied at committee are upheld in full and at the appropriate time to deliver those safeguards to ordinary people. Finishes with the view that they do not consider that the developer was ever interested in replacing the landscaping, but that ADC was either too overloaded or disinterested to ensure it was delivered.</p>	<p>checks and reporting. The example cited may reflect that successful planting depends on ground conditions and seasonal factors but that such failure is subsequently addressed.</p> <p>Both settled and transient communities require a degree of privacy and access to the same services. Site operational matters will be regulated by licensing. Together with the planning requirements, these measures should 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 that promote harmony between the different communities.</p>
Mrs Coney	<p>Makes general comment that most of the sites are on the Western side of the District and concentrated in her local area (Aldingbourne, Fontwell, Nyton, Barnham and Eastergate). Asks if there are not suitable sites on the Eastern side and expresses surprise there would not be. Would wish sites to be allocated ACROSS the District rather than in one area.</p>	<p>No change/Action. The Council has commissioned an extensive evidence base on the needs of Gypsy and Traveller households and assessed potential site options (including to the east of the District) to meet identified needs through reviewing existing sites and other potential allocations against criteria set out in national guidance (e.g. PPST 2015) including a sustainability appraisal. The authority must also demonstrate that sites are deliverable, and this requires a willing landowner. There have been two separates 'call for sites' as well as two Regulation 18 consultations inviting ideas for the distribution of provision to accommodate needs. The evidence and policy approach reflects the sustainable</p>

	<p>Asks whilst considering travellers, what consideration is being given to the many people who live here permanently and need housing as well. Considers that on larger developments adequate provision is still not being made for lower income families.</p>	<p>sources of available supply; where sites have been sieved as suitable, available and achievable.</p> <p>No change/Action. Planning policy addresses inclusive needs across a broad spectrum. The assessment of Objectively Assessed Needs covers both the settled community and transient communities, people of different cultures and faiths and beliefs and includes making provision to meet 'special needs' for example, provision for elderly, infirm and people with a disability or health needs, the needs of children and younger people and disadvantaged households (e.g. affordable housing).</p> <p>Both settled and transient communities require a degree of privacy and access to the same services. Site operational matters will be regulated by licensing. Together with the planning requirements, these measures should set a framework for sustainable and successful sites that meet the needs of occupiers as well as the settled community</p>
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