P. Carder
7 The Laurels
Southwater
RH13 9UJ

Your Ref: 000013824
Our Ref: A/82/12/ *30-07-2012*
Please ask for:
Mr P Cleveland

1st October 2012

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended)

Residential development comprising 150 no. dwellings including 30% affordable with access, landscaping, open space & associated works (this application is a Departure from the Development Plan)
Land to east of Roundstone Lane Angmering

Thank you for your internet representation made on 28th September 2012 which has been recorded as **an objection'** with the comments as follows:

Since the application site lies outside the present built-up area boundary of Angmering village it therefore falls to be classified as countryside within the scope of Arun Local Plan (saved) Policies GEN2 and GEN3, which however the applicants argue should be disregarded as being ¿outdated¿ in view of the Council¿s obligation to maintain a five-year supply of housebuilding land as required by national and regional planning policy (in the□
form of the National Planning Policy Framework and the South East Plan).□
□
Although the applicants cite in support of their proposals the NPPF stipulation that `relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites¿, para. 49 should it is submitted be read in conjunction with para. 47 which stipulates that planning for housing supply should be informed by an evidence base that reflects□
`objectively-assessed¿ local housing needs.□
□
The applicants argue that their proposed development should be allowed because, contrary to the NPPF, the Council cannot demonstrate that it has a five-year (plus□
20%) land supply sufficient to meet the housebuilding ¿target¿ imposed by the still-extant SEP (# Policy SCT5). However not only does this contention ignore the impending revocation of the SEP (which the courts have ruled may be taken into account as a□
material consideration in deciding planning applications), but also the fact that the SEP allocation was not based upon the `objectively-assessed¿ needs of Arun District but was instead ¿cascaded¿ down as Arun¿s share of a wider, regional housebuilding total.□
□
Even if, as the applicants assert, the Council is still bound by the SEP housebuilding target, their claim as to its lack of a five/six-year housing-land supply should however be reconsidered in the light of recent site approvals for over 1800 new homes at Courtwick Lane and North Littlehampton, which - as the applicants themselves admit (Statement # pp. 8-9) - would largely redress the alleged shortfall arising from the SEP requirement. Moreover, the inspectors in the two local planning appeals cited in support by the applicants (# pp. 6, 10) seem not to have considered in their published decisions the contribution of these sites to Arun¿s housing land supply, nor the impact of the current economic recession upon housing unit completions and the consequent effect of this slow-down upon Arun¿s ability to meet the annualised SEP target.□
□

A further reason for not granting planning permission for this site at this particular time is that it is located within an area identified as an option for `strategic housing allocation¿ in the draft new local plan, the finalisation of which might be seen to be prejudiced in a□ particular direction should permission to develop this particular site be granted now. Another decisive reason against granting permission for this particular application is that it envisages just 150 homes on a 6.8 hectare site and therefore a d.p.ha. of only 22, which suggests an inefficient use of the land concerned inconsistent with NPPF sustainability principles and the SEP recommendation of at least 30 d.p.ha (the 2009 Strategic Housing Land Availability Assessment having mooted some 280 homes for a 10.7 hectare site of which the application site forms the major part).□

Your views will be considered before the application is determined and I shall write to inform you of any decision made.

Please be aware that if the application is to be determined by the Council's Development Control committee and your letter has been received at a late stage after the Agenda has been published you will not receive a separate letter notifying you of the date of the meeting and procedures for public speaking. In such circumstances it is recommended that you track the progress of the application on the Council's website or telephone the Council for further information. Please be advised that any comments you make that are not included within the Committee Agenda will be reported to the Members of the Development Control committee. Please also be aware that only a small number of all planning applications received go the Development Control Committee. Most are determined under delegated powers by Officers in which case your comments will again be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and may publish details of your comments on the internet on the Arun District Council Planning section. Please ensure that you only provide information that you are happy will be made available in this way. If you supply information belonging to a third party, please ensure you have their permisison to do so. If you do not wish your comments to appear on the 'open file' please confirm this in writing and I will arrange for it to be destroyed although this means that its contents will then be disregarded.

In the event of a subsequent written representations appeal, against a refusal of planning permission on a householder application, any representations made on the application will be automatically forwarded to the Secretary of State. Unlike all other types of appeal, there will be no further opportunity to comment at the appeal stage.

Yours faithfully

Karl Roberts
Assistant Director Planning & Economic Regeneration