

Donald Neame
Rambler Cottage
Shripney Lane
Bognor Regis
West Sussex
PO22 9NR

Your Ref: OWPC16875
Our Ref: BE/135/17/PL 08-12-2017
Please ask for:
Richard Temple

15th January 2018

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Continuance of use without compliance with condition 4 imposed under BE/151/11/
relating to occupancy.

Shripney Garden Caravan Site Shripney Lane Bersted

Thank you for your internet representation made on 13th January 2018 which has been recorded as '**an objection**' with the comments as follows:

Comments on planning application BE/135/17/PL for Continuance of use without compliance with condition 4 imposed under BE/151/11/ relating to occupancy.

I wish to object to the proposed variation to BE/151/11

1. The application claims that Arun's housing supply projection shows a shortfall in the five year supply (however the statement provided is so poor that the table included cannot be read). The applicant by this means claims that therefore the Local Plan is out of date and the NPPF paragraph 14 is invoked.

However:

a) The Arun Local Plan 2011-31 publication version (12.1.25) clearly states that the submitted plan complies with the NPPF in having a sufficient supply of housing land for the first five year period (2015-2020) to meet housing requirement of 580 homes per year plus a 5% buffer.

b) I believe the table supplied that claims a shortfall in housing is not from the published plan - which is the only one agreed at this point. The local plan cannot by any stretch of the imagination be considered 'out of date'.

c) Taking one paragraph of the NPPF or one statistic from the local planning authority does not support sound decision-making; the documents need to be viewed as a whole. e.g. The NPPF states also that (para 12) 'This NPPF does not change the statutory status of the development plan as the starting point for decision making.'

d) The adverse impacts of this development are clear - overbearing development and increased traffic on a site which has been clearly identified by both a planning inspector and the local authority as being a highly environmentally sensitive site. A previous Arun DC officer's report for this site states that "The permanent residential use of the site would be detrimental to the amenities of the occupiers of Middleton Terrace by reason of disturbance."

2. Sustainable development. The applicant claims Paragraph 55 of the NPPF (which would otherwise not support the application) is not relevant as the site is not 'isolated'. This is incorrect reading of the paragraph. Irrespective of whether the site is isolated or not, the paragraph states that 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.' This is certainly not the case in this instance. The vitality of the community does not need to be enhanced or maintained. In fact the development of the site has been

described by Arun DC and the planning inspector as 'unneighbourly', to be an environmentally sensitive site, and to have a serious and adverse urbanising effect on the character and appearance of the rural area. Para 55 therefore does apply to this application and indicates it should be refused.

3. The land is currently used for mobile holiday homes. However it can be returned to Grade 1 agricultural relatively easily. This point was made by Arun DC on granting the original planning permission for caravans. If the exceptional circumstances (that made development of an environmentally sensitive site an absolute necessity) are now no longer valid, then the site should be returned to agricultural land.

Previously the Government appointed planning inspector has stated that development on this site should be refused 'as it would be a development of high quality agricultural land.'

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 will 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 permission 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

Neil Crowther
Group Head of Planning