

From: Simon Davis
Sent: 02 June 2020 18:10
To: Planning Scanning
Subject: FW: BN/50/20/PL West of Fontwell Avenue - Agricultural Land

Application Correspondence "Guidance on Sustainability & Options Appraisal"

Simon J Davis MRTPI
Principal Planning Officer
Directorate of Place

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From: Simon Davis
Sent: 02 June 2020 18:09
To: Maddi Simpson [REDACTED]
Subject: RE: BN/50/20/PL West of Fontwell Avenue - Agricultural Land

Hi Maddi,

Further to our call earlier

Policy SO DM1 states that *The requirement to protect the best and most versatile land can be outweighed if it is demonstrated through sustainability and options appraisals that:*

- a. Preservation of land of lower agricultural quality has greater benefits in terms of ecosystem services (for example carbon storage, flood water retention, support of biodiversity);*
- b. That any site preferred for development is demonstrated to be the best and most sustainable option, including but not limited to the terms of land quality, ecosystem services, infrastructure and proven need; and*
- c. The proposed development meets the requirements of the countryside policy and/or equine development policy.*

I have spoken to our policy team about the 'and' between b. and c. and they believe that these should be separate considerations as clearly residential development in the countryside is not going to meet criteria (c). This will be picked up by the Local Plan review.

We think that a sustainability & options appraisal should take the form of a sequential site assessment similar to what you might do with a FRA (but obviously with different parameters). We also note the NPPF para 171, fn 53 which states "Where significant development of agricultural land is demonstrated to be necessary, areas of poor quality land should be preferred to those of a higher quality." This also suggests that it is necessary to demonstrate that your site is better than others.

I hope this helps

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From: Simon Davis
Sent: 22 May 2020 15:15
To: Maddi Simpson [REDACTED]
Subject: BN/50/20/PL West of Fontwell Avenue - Agricultural Land

Dear Maddi,

I note in your statement that you argue that the need for housing outweighs the conflict with Policy SO DM1 (Soils).

Please be aware though that on this basis, we will have to report conflict with SO DM1 and if the app is to be recommended for approval, we will have to do so in the overall planning balance. You may wish to consider instead submitting reports to satisfy either criteria (a) or (b) of the policy which would then allow the proposal to be considered in accordance with SO DM1. I just thought I would mention this.

SO DM1 - *"The requirement to protect the best and most versatile land can be outweighed if it is demonstrated through sustainability and options appraisals that:*

- a. Preservation of land of lower agricultural quality has greater benefits in terms of ecosystem services (for example carbon storage, flood water retention, support of biodiversity);*
- b. That any site preferred for development is demonstrated to be the best and most sustainable option, including but not limited to the terms of land quality, ecosystem services, infrastructure and proven need;"*

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |
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