

[REDACTED]

From: paul collins [REDACTED]

Sent: 27 February 2021 13:31

To: Karl Roberts <Karl.Roberts@arun.gov.uk>; Neil Crowther <Neil.Crowther@arun.gov.uk>; Simon Davis <Simon.Davis@arun.gov.uk>

[REDACTED]

Subject: RE: DCC 3/3/21 Agenda item: 14 Planning Application P/1/21PL

Dear All

I write further to my last below so as to add to my representations for the purposes of the inevitable Officers Update Report.

I note that the current Officers report includes recommended refusal reason 1 which states: *The proposed change of use of the land to use for open space does not accord with policies H SP1, H SP2 and H SP2a of the Arun Local Plan 2011-2031 and would prejudice delivery of the Local Plan housing strategy, contrary to paragraph 59 of the National Planning Policy Framework*

Policy HSP 1 allocates circa 25 hectares of land notated on the attached plan as SD1 for development with 400 houses so please can you explain to my clients, me and your members by way of the Officers update report how and why the use of that part of this land cross hatched green on the attached plan as proposed could or would prejudice the delivery of 400 houses on the remaining 18.7 hectares of SD1 at an extremely low notional density of just 21.3 dph as putative Refusal reason 1 asserts?

I appreciate that the Outline Planning permissions with all matters except access reserved granted under ADC Ref: P/25/17 OUT and P/1'40/16 OUT suggest that SD1 be developed with up to 465 houses but these were of course granted as departures from Policy HSP 1, have not been implemented to date, have not been made subject to any reserved matters applications to date, are subject to numerous undischarged pre commencement conditions and the use of the subject land as open space would not prejudice the delivery of those outline planning permissions in any case due to the remaining land within their sites available.

Hopefully a better understanding of the concerns raised by Officers will assist us all to decide whether or not this application should in fact be refused for the putative reasons stated.

Thanks

Paul Collins BA (Hons) DipTP
[REDACTED]

From: paul collins [REDACTED]
Sent: Wednesday, February 24, 2021 4:16 PM
To: 'Karl Roberts' <Karl.Roberts@arun.gov.uk>; 'Neil Crowther' <Neil.Crowther@arun.gov.uk>; 'Simon Davis' <Simon.Davis@arun.gov.uk>

[REDACTED]

Subject: DCC 3/3/21 Agenda item: 14 Planning Application P/1/21PL

Dear All

Please see my e mail to the case Officer Mr Davis dated 20 February 2021 attached to which I have received no substantive reply.

The Officers report as currently written misrepresents the application made, the law, government and development plan policy and recommends two reasons for refusal that are totally incapable of being substantiated and properly defended at appeal and therefore misdirects the Committee .

My client will exercise their right of appeal if the Committee refuses the application on the basis of the two refusal reasons issued and with this in mind I draw your attention to the attached PPG relating to ***What type of behaviour may give rise to a substantive award against a local planning authority*** so that members may (in the public interest) consider same.

This application should clearly be permitted, having regard to its accordance with the development plan, national policy and any other material considerations and I invite the Committee to reject the Officers recommendation as currently worded and vote to approve the application subject to the following condition:

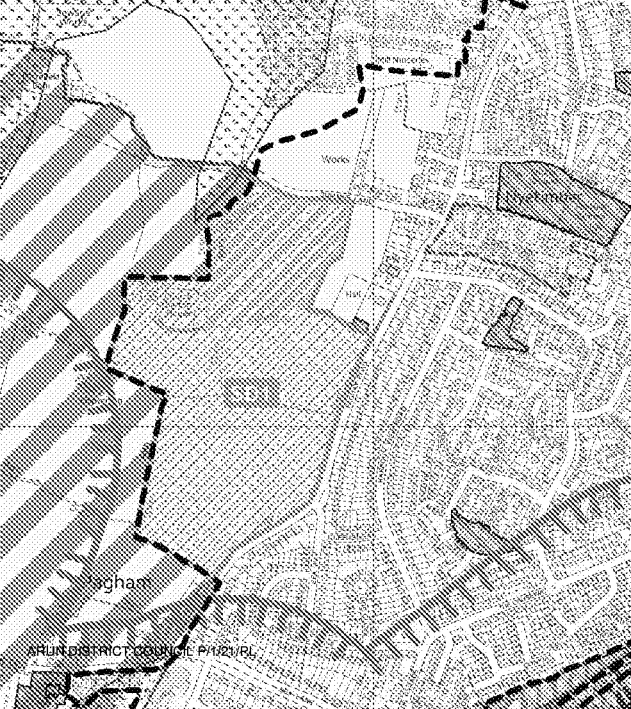
The land shall not be used for open space unless and until details of an access for vehicles associated with the maintenance of the land as open space have been submitted to and approved in writing by the LPA.

No need for a reply now but please treat this as my representation to this committee on behalf of the applicant as I will not be speaking at the Committee itself as I have no need or desire to waste the Committee's time or mine and we can and will respond to any decision made as neccessary and as we see fit.

Thank you for considering this representation and please place same (with its attachments) on the Public file for the application

Paul Collins BA (Hons) DipTP

[REDACTED]



Woods

Hill

Bagham