

**From:** [REDACTED]  
**Sent:** 03 September 2018 19:25

**Subject:** Y/91/17/OUT & Y/92/17 OUT Land at Bilsham Road Yapton & Land east of Drove Lane Yapton BN18 0EB

Dear David

I note that these applications have now been under consideration by ADC for some 8 months and that the last extension of time agreed with the applicants expires on 12 September 2018 with the suggestion being that the application was to be determined at the DCC on 5 September 2018 but it is not on the agenda for that meeting and the next meeting is not until 3 October 2018.

In my view any decision to grant permission in respect of the application would be premature at this time pending the outcome of the following work:

- A review NPPF 2018 on 24 July 2018 and the implications of the revised Presumption in favour of sustainable development at paragraph 11 and the Achieving sustainable development, Plan-making, Decision-making,

Delivering a sufficient supply of homes, Promoting sustainable transport and Annex 1: Implementation sections for the ADLP 2018 and its housing strategy

- The Council's annual monitoring process with regard to housing delivery, emerging Neighbourhood Plans or reviews of made Neighbourhood Plans and the non-strategic sites allocations DPD processes set out in ADLP 2018 Policy H SP1 The Housing Requirement and its supporting text
- The production/adoption of a Community Infrastructure Levy (CIL) Charging Schedule as proposed in the Local Development Scheme
- Such reviews and processes might reveal an increase or decrease in the district wide requirement figure and determine the need or otherwise for the Strategic Allocation SD7, its phasing and infrastructure requirements and/or could trigger the need for a review or partial review of the ADLP sooner than the statutory 5 year review date.

However if the Council does wish to determine the application in advance of this work my view would be that the application should be refused for

the following reasons relating to the principle of what is proposed:

1. The applicants have failed to demonstrate that the proposed development can be undertaken alone and/or in conjunction with other proposed development in accordance with the requirements of Policies SD SP1a Strategic Approach, GI SP1 Green Infrastructure and development, H SP2 Strategic Site Allocations and H SP2c Inland Arun Yapton SD7
2. The applicant has failed to demonstrate that the proposed development will alone and/or in combination with other proposed development provide for the relevant infrastructure requirements for the SD7 allocation as specified in Arun District Local Plan 2018 Policies INF 1, INF 2 and the associated Infrastructure Delivery Plan.
3. The development as proposed is not in accordance with material development plan policies and there are no material considerations that indicate the decision should be taken otherwise than in accordance with those policies.

As you are aware a decision to refuse the application for these reasons could be made by Officers acting under delegated powers.

Please bring my concerns and comments to the attention of the DCC if Officers do choose to recommend the application for approval.

Thank you

**Paul Collins BA (Hons) DipTP**