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From: Angela Broughton [REDACTED]
Sent: 27 October 2020 13:49
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Bonhams Field

Dear Mr Davis,

Thank you for your prompt reply.

The fact that an outline planning permission (Y/1/17/OUT) was approved on 7 December 2017 does not in any way restrict the Council's legal duty to determine this new full planning application on its own merits some three years later, in accordance with the relevant up to date national and local planning policies, and taking into account any other changed circumstances and material considerations since December 2017.

The 2017 permission was assessed against the Arun District Local Plan 2003. There is now an updated Arun District Local Plan 2018 and new adopted planning policies on agricultural protection, including SO DM1, must now be given more weight in the 'balancing exercise' you refer to in your email.

The Planning Report which led to the December 2017 outline approval acknowledges that Bonhams Field is Grade 1 (highest grade) agricultural land, but states: *"it is considered that the site is limited for*

agricultural use due to its size/workable area and accessibility." There was no evidence provided to back up this very subjective opinion at the time.

The Planning Report also acknowledges that the four page agricultural assessment submitted in September 2016 did not fulfill the requirement for a 'Soil Resources and Survey Plan', and made this a separate pre-commencement planning condition of the outline approval (Planning Condition 17).

Although the Council approved the discharge of this planning condition on 11 August 2020 they did so by referring to the information in the undated Construction Management Plan as being acceptable. A rather strange interpretation of the requirements and purpose of the planning condition.

Therefore, there has never been a proper 'Soil Resources and Survey Plan' prepared for Bonhams Field, as required by current Council policy, SO DM1.

This policy clearly states that *"Development WILL NOT be permitted unless*

d. The applicant has submitted sustainability and options appraisals, mitigation measures, and a soil resources plan for the development site;

e. Site appraisal documents submitted by the applicant MUST demonstrate that consideration has been given to DEFRA's Soil Strategy for England.

f. The productivity of the land is demonstrated using a methodology for assessing gross margins as contained in the Arun Soils and Agricultural Land Assessment Report"; and

g. The applicant has submitted a comprehensive soil resources plan for the development site which demonstrates that care will be taken to preserve the soil resource, such that it can be incorporated into a Productive Green Environment following development".

Given the above adopted planning policy, it looks like the Council's list of validation requirements is now out of date.

It may be that the loss of this agricultural land was "previously sanctioned" by the Council, but it is a legal requirement that this previous assessment based on a "balancing exercise" undertaken in 2017 is revisited when assessing this new full application (note: it is not a variation application), and evidence needs to be available in order for the Council to make this assessment.

From your reply, I anticipate that no up to date 'Soil Resources and Survey Plan' document is expected to be submitted as part of this application, that it will just be reported as a failure to comply with this adopted planning policy, and that this failure will be of no consequence in your final recommendation/decision.

I have tried to put this objection on the planning portal, but it is not yet showing. If for some reason it does not appear, can you please place this as an objection to the current planning application.

Regards,

Angela Broughton