



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Cllr Roy Briscoe	
Address		
Postcode		
Telephone		
Email	roybriscoe@westbourne-pc.gov.uk	
Organisation (if applicable)	Westbourne Parish Council	
Position (if applicable)	Chair of Planning Committee	

Is this the official view of the organisation named above? Yes No

¹ Where provided, we will use Agent's details as the primary contact.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 90	Policy Reference:	DM5
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

There is concern that the policies as drafted are based on an inadequate or even flawed evidence base. From an assessment of the approach to the evidence base it would appear that there is no authentication or validation that persons occupying existing GTTS accommodation are either true gypsies / travellers albeit some are of GTTS heritage. From experience locally in Westbourne it is believed that many occupants of accommodation intended to be reserved for the GTTS community are in fact occupied by non GTTS persons who are simply seeking affordable accommodation. The additional levels of occupation by non GTTS persons exaggerates the true level of need leading to an inflated assessment of what is actually required.

A separate more detailed response to the ORS report on GTTS Accommodation has been sent to Tracey Flitcroft which highlights our concerns.

We would urge CDC to challenge the accuracy of the original GTTS needs survey on this basis in order to avoid over provision and certainly before accepting the recommendations. Once GTTS dwellings are actually provided on site there would appear to be inadequate enforcement of 'occupation' restrictions. In effect this results in the creation of what could be classified as "Park Home Communities" by default.

Another significant concern based on the experience of WPC is to ensure that a policy provision is included in the range of GTTS policies to avoid over concentration of GTTS dwellings in one location.

This is a particular concern for Westbourne but it probably applies to other communities such as Funtington where there are already significant numbers of GTTS dwellings in existence.

The concern is that the existing policy S7 includes a sequential approach that tends to favour intensification or extension of existing GTTS sites as a means of providing the total numbers of dwellings considered to be needed within the District.

In some situations, this may well be satisfactory but where the existing settled community would be adversely affected by increasing the size and scale of an existing GTTS site, the impact on its social infrastructure and its community cohesion / balance can be a significant problem, as experienced in Westbourne.

The DM5 Policy states at 1. In assessing the suitability of New sites, it should also include **Existing sites** we assume this has been missed by mistake.

What improvements or changes would you suggest?

At point 1 it should also apply to **Existing sites** as well as new ones.

Such additional intensification should be resisted in cases where there are large existing groups and only be considered up to a maximum number in any one location such as 18 which was a figure that was in a previous PPG issues by Govt.

It is recommended to CDC that a criteria-based approach to extension of existing GTTS sites should be included so that further expansion can be resisted, where it can be demonstrated that there **could** be a harmful impact on the settled community, particularly in terms of social infrastructure and community cohesion / balance. Additional wording for safeguarding against oversized Camps in relation to the relatively small Rural villages. The Westbourne Neighbourhood Plan (WNDP) has such a Policy which was approved and endorsed by the examining Inspector.

A more even spread of GTTS should be made across the CDC area and not focus them in large pockets or ghettos where control of the sites in planning is easily lost.

In some cases, extension to existing Camps might prove appropriate, however in numbers that Westbourne and Funtington experience it would be wholly inappropriate to extend them as recognised by the examiner of the WNDP.

We would also like to see that any additional new Pitches/Plots for GTTS are rigorously checked and occupation enforced.

As the GTTS community are afforded additional flexibility toward present Planning Policy/Regulation. We would suggest that to enjoy these benefits of positive discrimination any such application should only be considered where;

- the applicant can show that the occupant is from this Group (Must Provide Evidence)
- that speculative applications will not be accepted, this may need additional wording to the policy
- That applicants have a local connection to Chichester or area they wish to set up.
- When exchanging hands, the new occupier should also be required to prove their status to CDC planning in order to comply with the current PPG.
- Some form of additional Conditions that are enforceable might help.
- Worth viewing the criteria the SDNP have put in their Plan which the examiner of the WNP passed comment on as being appropriate.
- SDNP POLICY

Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople

1. Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.

2. The National Park Authority will seek to meet the need of Gypsies, Travellers and Travelling Showpeople up to 2027 / 28, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately? (as defined in Planning Policy for Traveller Sites (2015) or any subsequent policy) will be permitted where they:

a) Can demonstrate a local connection;

b) Can demonstrate that there is no alternative available pitch which could be used in the locality;

c) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;

d) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling / waste management without harm to the special qualities of the National Park;

e) Provide sufficient amenity space for residents;

f) Do not cause, and are not subject to, unacceptable harm to the amenities of

neighbouring uses and occupiers;

g) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and

h) Restrict any permanent built structures in rural locations to essential facilities.

4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed-use yard with areas for the storage and maintenance of equipment.

So 'c' actually looks at over-concentration in any one place and we believe CDC should do the same.

Will the WNP still carry weight once this new Plan is made? Perhaps a reference or policy can be included to state any existing Neighbourhood Plans that have been made with any specific GTTS Policies will retain their validity above this new Local Plan

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	Cllr Roy Briscoe
Date:	29 th Jan 2019