



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 44	Policy Reference:	S7
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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 proposed 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.

What improvements or changes would you suggest?

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, especially in small rural settlements like Woodmancote.

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.

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 beneficial, 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/and 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.
- Perhaps the wording in the SDNP Local Plan could be applied we understand the Examiner has not passed any negative comment on their policy and that it is compliant.

(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:	28 th Jan 2019