



Agenda Update Sheet

District Planning Committee

Date 3rd October 2019

Agenda Item 4:

Recommended for Approval

APPLICATION NO: DM/18/5114

Front Cover: Application reference number should read DM/18/5114

Page 10: Additional representations

Additional representation from Cllr Paul Budgen raising the following issues:

"I write further to my representation last week regarding GTA provision at the Northern Arc with a further representation below over the proposed site area of 0.54ha for 13 GTA pitches

You will recall at the Northern Arc briefing last Wednesday evening, I raised concern as to whether 13 GTA pitches could be accommodated on a 0.54ha site and Members were assured by a representative of AECOM the site area had been calculated in accordance with "common standards" and that I could be guided to them. I believe the respondent was mistaken though, as I am well researched on the subject of GTA provision and not aware of any guidance on site area.

I have embedded below [officer note: not included in update sheet] a screen shot of an AutoCAD exercise based on the scheme for 13 GTA pitches approved at Copthorne earlier this year which substantiates my view that a 0.54ha site is inadequate:

The small rectangular area edged pink is a parking space measuring 11.52m² which has been used to index the scale of the plan. The larger area is the developable area after excluding the ancient woodland buffer zone and perimeter tree line and has an area of 7096m² or 0.79ha. I accept the indexing will not be 100% accurate but nonetheless on this basis the proposed site area at the Northern Arc is some 24% smaller than the site at Copthorne.

It then needs to be borne in mind I have repeatedly asserted that eight of the pitches at Copthorne are some 50% smaller than the equivalent bricks and mortar housing and the units marked up are only fit for use as holiday accommodation. The view that the pitches incorporate a rest room is flawed as the utility blocks only provide a shower room and utility room, not habitable accommodation. Further, it is disingenuous to fail to have regard to floor space standards on the basis they do not apply to caravans as these pitches are intended to provide permanent accommodation for the GTA community when they are not travelling.

No reasonable view could be taken that if the site at Copthorne was reduced in area by 24% that it could still accommodate 13 pitches, let alone 13 appropriately sized pitches.

GTA sites are intensive users of space compared to even residential development in the form of bungalows - space is required for a touring caravan in addition to parking spaces, a managers office and turning circles which can cope with articulated vehicles delivering mobile homes (which are much larger than those required by refuse vehicles for example).

It is a common finding of advocacy groups that poor accommodation is the main underlying factor beneath nearly every poor outcome experienced by the GTA community including for example infant mortality, life expectancy, literacy, suicide rate etc. and it is particularly concerning in this instance that both MSDC and Homes England have a duty in law to actively promote equality of opportunity.

I believe the demonstrable inadequacy of a 0.54ha site to accommodate 13 pitches is a material consideration which should be addressed before the application is determined.”

Additional representation from Sussex Wildlife Trust raising issues summarised as follows:

- Reference to net gain is vague, does it refer to DEFRA metric approach?
- Encourage Council to consider what soft assets could deliver including road verges.
- Important that surveys inform the application rather than be a box ticking exercise.
- More survey work is still required
- Design Guide should include greater commitment to biodiversity
- Location of some roads could impact upon habitats and conflict with Council's biodiversity policy.
- Early delivery of green infrastructure and net gains should be put in place

Additional representations from Friends of the Earth (Brighton) raising issues summarised as follows:

- Welcome some of the improvements made but maintain objection on grounds of low density, will be highly accessible by car, use of shared paths contrary to Equality Act and NPPF, lack of comprehensive public transport strategy
- No contribution should be made to A2300 and Toucan should be provided
- Various design issues with cycle paths and shared paths
- Two primary schools too close to one another and not close enough to their catchment areas
- Cycle parking option not prominent enough as shown in Design Guide
- Little linkage with Haywards Heath
- Mobility corridors should include segregated cycling and pedestrian facilities
- Support other objections raised by Sussex Wildlife Trust and CPRE
- Development should accord with West Sussex Cycling Design Guide (published August 2019)

3 additional representations including from the Worlds End Transport Users Group raising issues summarised as follows:

- What provision there is in the new development for a "green corridor for pollinators" to move to and from Bedelands.
- Also will there be new allotment sites on the new development?
- A longer period of consultation is required to enable the development to be scrutinised
- There is a need for infrastructure and accessibility improvements at Wivelsfield station before development commences

Pg 18: Amended comments from West Sussex County Council confirming that this outline application should secure £14.84 million towards the secondary school. This takes into account the £3.16 million already secured by the Freeks Farm consent - meaning the overall contribution from the Northern Arc (Outline planning application and Freeks) amounts to half the cost of the school (£18 million).

Pg 21: Final comments from Highways England to be updated verbally.

Pg 29: Additional consultee response from West Sussex County Council Gypsy & Traveller Team Manager stating:

“I would confirm that I have been made aware of the provision of a G & T site in the Northern Arc Development. I understand that it is proposed to provide a 13 pitch site on a 0.54 hectare site. Each pitch is 300 square meters with space for a mobile home, a touring

caravan and an amenity building with 2 parking spaces and a small garden. In addition there will be circulation space of 1500 square meters. In my opinion this is more than sufficient for each plot and would provide plenty of space for a family.”

Page 164: Delete condition 28 and renumber subsequent conditions accordingly.

Page 164 : Add additional pre-development condition and renumber subsequent conditions accordingly:

No development shall take place within each reserved matters area where the River Adur is located until mitigation/enhancement plans for the River Adur within that reserved matters area have been submitted to, and agreed in writing by, the local planning authority and implemented as approved. Thereafter, the development within that reserved matters area shall be implemented in accordance with the approved scheme.

Reason: To protect the watercourse and to comply with Policy DP41 of the District Plan and the NPPF.

Page 171: Add additional post occupation management condition and renumber subsequent conditions accordingly:

Any outdoor sports pitches provided at the two primary schools and one secondary school hereby permitted shall be made available for public/community use in accordance with details to be submitted to and approved in writing by the local planning authority prior to the occupation of each of the schools.

Reason: For the avoidance of doubt and to provide a benefit to the wider public in terms of leisure provision and to accord with Policy DP24 of the Mid Sussex District Plan.