



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)
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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

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

Westbourne Parish Council in Chichester made it clear from the outset that they wished to be consulted by the Company undertaking such a study. One Parish Councillor (Roy Briscoe) contacted ORS to ask that they be consulted prior to the commissioning of the report, no such contact was or has been made.

A Previous report by ORS and Peter Brett Associates in 2013 revised in 2014 identified the need for a further 59 pitches for Gypsy Travellers in the plan period to 2027. This figure was revised down by the 2014 report but as the Chichester Local Plan was made based on the higher figure that higher figure was retained. (In 2014 the revised figure fell from 59 to 52)

Since 2013 to 2018 all the 59 additional pitch requirements to 2027 **have been met**, well in advance of the 2027 date, a number remain **vacant** but a number are also occupied by persons who do not meet the definition of a Gypsy or Traveller as per the DCLG PPG. So, the figures are artificially inflated to start with.

A number of pitches have been set up by individuals who abuse the planning system and see the Positive discrimination toward the Gypsy/Traveller DCLG PPG as a way of increasing the value of cheap agricultural land, by setting up what can only be described as 'Park Home' developments. Many of those living in these developments will claim they are Gypsy/Travellers whilst having no intention to travel or ever having travelled or stopped traveling for the time being, they see this as an opportunity for Cheap Housing, either rental or purchase.

This is the feeling among many of the Parish Councils in Chichester where there is Gypsy and Traveller accommodation, bearing in mind the Parish Councils are the closest to the communities they serve and so should have been consulted.

It is hoped that Chichester will adopt a policy that will ensure that in the future the persons taking up residence in such accommodation are in fact Gypsy and Travellers, the policy we hope will stop speculative applications by ensuring there is an immediate need and only those with Gypsy and Traveller status will be eligible.

Background to the Parishes concerns;
Please refer to additional paper sent in Confidence

So, you can see and understand the frustration building up amongst the settled community whereby they see the planning rules being abused on the pretext of the Gypsy and Traveller Community, giving the Gypsy and Traveller Community a bad name.

The Settled community in Westbourne feel angry and resentful as a result of the abuse which unfortunately to say is as a result of the findings of a previous ORS and PDB report and the Planning Inspectorate decisions based on that report.

It is almost impossible for the District Planning Enforcement team to do anything about the abuse, which leads to further frustration amongst the Community and alienation of bona fide Gypsy's and Travellers. So, whilst we accept there is a need for Gypsy/Travellers and Travelling Showman Accommodation there must be some conditions that can and should be applied to ensure that this Relaxation of the Rules for that particular community is adhered to.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

The Parish Council would like to see that before **anyone** moves onto a site that **they prove** that they are Bona fide Gypsy/Travellers or Travelling Showman that they have a local connection and do not have suitable accommodation where they presently are.

That condition **can** be applied as they are claiming a benefit not normally allowed to the general Population. If residence is taken up before that is done or they immediately fail to provide that evidence then they should no longer be entitled to the benefits enjoyed by the GTTS Community through the DCLG PPG and be subject to an enforcement notice to quit the land.

The Parish Council strongly disputes the claim by the Council Officer that the accommodation required by the Gypsy/Traveller community has been underestimated in the past and current. We believe there is probably a case for an additional Council run site as that is where the 'need' appears to be but in general terms we would argue that the GTTS are more than sufficiently catered for on Private sites.

Observations regarding the current ORS Report.

ORS report in Blue Westbourne PC response in Black
On Page 10

1.22 There were 57 Gypsy or Traveller households identified in Chichester that met the planning definition, 72 unknown households that may meet the planning definition, and 32 households that did not meet the planning definition.

A Total of 161 pitches? ---We are not aware of the previous number identified by ORS but expect there to be a significant increase from the previous figure due to occupation by non-Gypsy or Travellers.

1.23 The GTAA identifies a need for 94 additional pitches for households that met the planning definition, and this is made up of 10 pitches that are unauthorised, 23 concealed or doubled-up households or adults, 2 from households on waiting lists for public sites, 17 teenage children in need of a pitch of their own in the next 5 years, 6 from pitches with temporary planning permission, and 37 from new household formation using a rate of 1.80% derived from the site demographics. There is also supply of one pitch from a household seeking to move from a public site.

Has it been demonstrated that all these additional pitches Meet the requirement in Chichester?

There were an additional 59 pitches required in the original report which was reduced to 52 in the 2014 update this should have taken us to 2027 all those 59 are all now catered for (7 over the initial figure). So where are these so-called Gypsy Travellers coming from?

Chichester is a nice place to live, many can't afford Bricks and Mortar so buy or rent one of these and claim Gypsy Traveller status.

So, considering the figures supplied for this study;

A Total Pitches	B Met PPG	C Unknown	D Not Met PPG	Not Met %
161	57	72	32	(A+B=89) 32/89 = 36%
Assuming the 72 Unknowns follow the same findings and therefore 36% are in the category as Not Met				
Therefore, the figure of Met Households is 161 less 58 (36%) as those that don't meet the PPG criteria				
= 103 should be the maximum as the base line (We believe that to be inflated to start with***)				

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

***It is/could be questionable that those that were not present on the 3 visits by ORS are Gypsy's or Travellers for the purposes of the study.

As the visits were performed when we/you would expect Gypsy/Travellers to be present, would be expected to be at their 'home base' If 3 visits performed, we ask the question were the occupants out working in the local economy as we believe and are and not Travellers.

We also question those that refused to answer! why did they not answer, we accept some Gypsy Travellers do not like or want anything to do with authority but were there significant numbers not wanting to be caught out as None Gypsy/Travellers? Which we believe from our experience.

However, those living in these Mobile homes know they are under scrutiny so don't want to give any cause to suspect they are anything but Gypsy/Travellers for fear of having to move out.

So those in the 'Unknown status' their needs should be significantly reduced as they have failed to provide any evidence to support their 'Special' Status.

Consideration should also be given to the number of 'Vacant' pitches and those that are occupied by those identified as Non-Gypsy which would provide for 32 + vacant (5 at least in Westbourne) so to start with (32 +5=) 37 pitches available, those not meeting the criteria should be on a housing register for re-homing into bricks and mortar. There is also the 1 household seeking to move from a public site, that figure is duplicated as there are 2 waiting to go onto a public site therefore only a net of 2 pitches instead of 3.

1.24 The GTAA identifies a need of up to 28 additional pitches for unknown households and this is made up of 3 unauthorised pitches, 2 concealed or doubled-up households or adults, and new household formation of up to 23 from a maximum of 74 households. If the ORS national average of 25% were applied this could result in a need for 7 additional pitches. Whilst the proportion of households in Chichester that met the planning definition is higher (64%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need of up to 18 additional pitches from unknown households.

We believe the ORS figure would be the more suitable figure considering the representations made by us so far. Again however, we would dispute the number of concealed and doubled up households on our knowledge of what is happening at the Paddocks off Common Road.

Planning Enforcement have been asked to check the status of occupiers but the Enforcement letters have not had responses. A case of too hard to do, maybe.

1.25 Whilst no longer a requirement to include them in a GTAA, there is a need for 23 additional pitches for households that did not meet the planning definition. This is made up of 2 unauthorised pitches, 6 concealed or doubled-up households or adults, 3 from households on waiting lists for public sites, 2 teenage children who will be in need of a pitch of their own in the next 5 years, and 10 from new household formation using a formation rate of 1.25% derived from the household demographics.

These should not be included as they do not meet the planning definition and should be put on the housing register.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

9.1 In Chichester, at the baseline date for this study, there were 2 public sites with 41 pitches; 1 public transit site with 9 pitches; 32 private sites with permanent planning permission for 96 pitches; 6 private sites with temporary planning permission for 7 pitches; 1 private transit site with 3 pitches; no sites that are tolerated for planning purposes; 6 unauthorised sites with 16 pitches; 4 sites with 8 pitches that are pending a planning application decision; and 28 Travelling Showpeople yards with 43 plots (one of which is pending a decision and one of which is unauthorised). Further details can be found in Appendix E.

Figure 32 – Total amount of provision in Chichester (January 2018)

Status; No. of Sites/Yards followed by Pitches/Plots

Private sites with permanent planning permission 32, 96

Private sites with temporary planning permission 6, 7

Public sites (Council and Registered Providers) 2, 41

Public transit provision 1, 9

Private transit provision 1, 3

Tolerated sites 0, 0

Unauthorised sites 6, 16

Private transit provision 1, 9

Private transit provision 1, 3

Tolerated sites 0, 0

Unauthorised sites 6, 16

Private sites pending a decision. 4, 8

Travelling Showpeople yards. 26, 38

Travelling Showpeople yards – unauthorised 1, 1

Travelling Showpeople yards – pending a decision 1, 4

Although this is the total amount, Westbourne Parish Council and several other Parish Councils would dispute the occupation of a large proportion of the Gypsy Traveller sites, much more than the figure for Travelling Showman plots although in Westbourne there are 5 empty Plots which the Travelling Showman's Guild say are unsuitable. The owner has sought to allow unauthorised use by;

1. A Tarmac Contractor and
2. Split some into pitches for Gypsy traveller use. (Now subject of a Planning Application.) so enforcement will not act until that is decided.

We also feel the inclusion of the Transit Site should not have been subject of the survey as these are supposed to be passing through whilst working in the area and will have permanent sites elsewhere.

9.2 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.

It is at this Point the local community should also have been included to determine what they know about these sites and encampments. Telephone interviews are much more likely to be liable to twisting the truth, although some we do accept will be telling the truth.

Cross border issues Havant (Hampshire) is immediately adjoining Westbourne (West Sussex) Total need for Havant in the plan period -----ONE-----a little disparity one may say.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

9.3 An interview was undertaken with a Council Officer in Chichester. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individual concerned, rather than the official policy of the Council.

Accommodation for Gypsies and Travellers

» A GTAA was completed by ORS in 2013 and an Update was published in 2014, which revised the pitch requirements, and identified a need for Chichester to provide an additional 52 permanent pitches by 2027. The GTAA also identified need for 18 plots for Travelling Showpeople. » Chichester are currently in the process of reviewing their Local Plan. The Council had begun working on a site allocation DPD and were looking to allocate sites, however this process was postponed due to the change in the planning definition. Once this GTAA is complete this will resume through another Site Allocation DPD. » **The Officer felt that Chichester may not be fully meeting the accommodation needs of Gypsies and Travellers in the area and referred the number of planning appeals to demonstrate that there is further unmet need.** The Officer explained that in the previous Local Plan there was no breakdown of numbers of private and public need which has led to a lack of clarity about need going forward. It is hoped that this study will lead to some clarity about the need for both types of provision. Overall the Officer felt there could be a need for an additional public site, possibly delivered in conjunction with a Housing Association.

Short-term Roadside Encampments and Transit Provision

» The Officer was of the view that numbers of encampments peak during the summer period and October when there is a fair in the area. There is a new transit site in Chichester that serves the whole of West Sussex.

Westbourne would dispute these comments, there remains 5 pitches and 5 Travelling Showman Plots Vacant in Westbourne, there may indeed be a lack of supply on 'Public Sites' which can be controlled by the WSCC but for private use there remain speculative applications and consequently vacancies which have been there now for a number of years. We would strongly refute this claim and we should have been included in the review process along with other Parish Councils.

WE would expect our additional supporting paper to be treated in the same manner with anonymity and in Confidence

Cross-Boundary Issues

» The Officer felt that Chichester is complying with the Duty to Cooperate and referenced the joint approach to undertaking GTAA studies. The Officer also said that during the Local Plan Examination the Inspector commended the authorities for working well together and providing a new transit site. It must be noted that a similar review in the neighbouring county of Hampshire recognised the need for **only one pitch across the boundary in Havant.**

The Examining Inspector for the Westbourne Neighbourhood Plan also indicated support for our Community Balance Policy and stated Westbourne should not be subject to additional pitches for the foreseeable future. There are 5 vacant pitches and have been since permission was granted at appeal, the owner has been unsuccessful in attempts to sell them.

Future Priorities and Any Further Issues

» To provide an additional public site. » The Officer was aware of the issues that had arisen when Homes Space took over management of the public sites and it was felt that it is currently being managed well by the County. Although it was the view of the Officer that the County should retain its responsibility for these sites, it was acknowledged that some are specialist Housing Associations who could manage the public sites.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

The Parish Council agree, when Homes Space took over management there was an increase in, 'poor neighbourly' incidents and anti-social behaviour, it is much better in the hands of WSCC. If it is the same officer that has had dialogue with the Parish Council, they described what was happening along Cemetery Lane as a 'Ghetto' with no integration with the Settled Community, although that was not directed at the Council Controlled site since being taken out of the hands of Homes Space.

Interviews with Gypsies and Travellers

9.4 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in Appendix F – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.

Westbourne Parish Council would like to understand what training your interviewers have, it is interesting to see the questions asked as they are mainly, 'Closed Questions'. In order to elicit the right information Open Questions should be used such as, Who, What, Where, When, Why and How!

Answers to Open questions can then be explored and it is difficult for interviewees to maintain a pretence, certainly the question as to if they are Gypsy's by the definition needs reviewing. This leads to additional numbers although it is clear some have answered truthfully and deemed not to be Gypsy's or Travellers.

Again, we believe those in the transit site should not have been included in the requirement for additional Pitches in Chichester.

9.5 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority. Agreed, but Parish Councils should have been consulted as well

9.6 Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 33 – Summary of fieldwork for Gypsies and Travellers

Local Authority	Pitches	No Contact	Vacant/Non-Travellers	Refusals	Complete Interviews	Incomplete Interviews
Chichester	180	40	26	30	78	70

Vacant sites should be included in the needs analysis along with the number identified as not meeting the criteria 26 +32 (From 4th Para Page 3) = 58 (Pitches Already available)

It is not intended to duplicate the full list as per the report but this addendum is cause for concern.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

²² The transit site was not full and many of the residents were legitimate transit occupiers who were planning to move on after a short stay. A total of 4 did want a permanent pitch locally and in addition 1 of the households that was interviewed identified 5 relatives with no permanent base who are in need of a pitch locally.

These could be from anywhere not specific to Chichester as Chichester serves the whole of West Sussex therefore should not be included in the need's specific to Chichester. Chichester is a very Nice area and many people would like to move here but can't afford it, these should only be accommodated in existing pitches if that is their wish to settle here. This is simply a way to make money out of cheap agricultural land.

Bricks and Mortar/Waiting List Interviews

9.7 The 2011 Census recorded 55 households that identified as Gypsies or Irish Travellers in Chichester.

This is more likely to be closer to the correct figure for all the sites.

9.8 Following all the work that was undertaken to identify households living in bricks and mortar, including trying to contact all the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.

This covers all West Sussex and not just Chichester?

Westbourne believe telephone interviews can be manipulated by the interviewee, face to face is much more likely to provide a truer reflection of the true needs. Those living in bricks and Mortar have by their own volition chosen to become 'Settled' and so should not form part of this process.

9.9 A total of 8 of these interviews were completed with households living in Chichester. Further information about the needs of these households can be found later in this section of the report. In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to conclude that no further allowances should be made for bricks and mortar households – other than that from those that were interviewed – because no others identified themselves as being in need.

Agreed

9.10 Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households in Chichester.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

Status	Meet Planning Definition	Unknown ²	Does Not Meet Planning Definition
Gypsies and Travellers			
Public Sites	5	15	21
Public Transit Sites	9	0	0
Private Sites	22	49	6
Private transit sites	0	3	0
Temporary Sites	6	0	0
Unauthorised Sites	12	3	2
Pending Sites	1	2	0
Bricks and Mortar	0	0	0
Waiting List	2	0	3
Sub-Total	57	72	32

This table clearly shows that the abuse of the status in these sites is rife and needs addressing by strong policies, requiring those wanting a pitch to prove they meet the definition as per the DCLG PPG.

A similar figure is also found in the Travelling Showman figures again 32 not meeting the definition therefore there should in effect be 32 vacancies for Travelling Showman plots/yards.

9.11 Figure 35 shows that for Gypsies and Travellers 57 households, and for Travelling Showpeople 25 households met the planning definition of a Traveller - in that they were able to provide information that they travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily. A total of 32 Gypsy and Traveller households did not meet the planning definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

Agreed and the figure is likely to be much higher with the knowledge we have of these sites.

9.12 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this include households that refused to be interviewed, and households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar and Waiting List Interviews

Their Status has to be questionable although we accept that some GTTS do have an aversion to Authority in this instance ORS appear to have been very diligent and been able to get responses from many that 'do' meet the criteria.

9.13 Following the work that was completed to identify households in bricks and mortar and to contact households on the waiting list for public sites a total of 8 interviews were completed. Only two of these households met the planning definition. One is living on an unauthorised pitch and the other has no fixed abode and both expressed that they were in need for a permanent pitch on a public site.

This does highlight the need for an additional Public Site, albeit only 2 met the definition. However, we would envisage the others may eventually join the large proportion of those not meeting the definition of a Traveller and start living on one of the sites, speculatively, therefore increasing the so called 'Needs' required by this District. (From Park Home developments)

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

Pitch Needs – Gypsies and Travellers that met the Planning Definition

9.15 The 57 households who met the planning definition of Travelling were found on two of the public sites (including the public transit site), 14 private sites, 6 temporary sites, 2 unauthorised sites and a site which is waiting for a planning application to be determined. Analysis of the household interviews indicated that there is a current need for 10 pitches from households who are living on unauthorised developments, 23 for concealed or doubled up households/adults, and 2 households on the waiting list in need of a permanent pitch. There is also a future need for 17 additional pitches for teenage children in need of a pitch of their own in the next 5 years, 6 for households that are living on pitches with temporary planning permission, and 37 additional pitches as a result of new household formation using a formation rate of 1.80% derived from the household demographics. There is also supply of 1 pitch (on a public site), due to become available in the first five years of the plan period.

We would dispute the inclusion of those on the transit site, for this portion of the survey, it is there for a purpose to serve those passing through our County not to increase the numbers wanting to settle here that has been covered in an earlier point.

Many of the unauthorised developments are from speculative applications by a certain individual from Chichester, who brings friends/relatives in, sells the pitch, then start games with Enforcement when they step in, selling between themselves etc. The 'Concealed or doubled up households' we can refute as many in the Westbourne area are not people that meet the Planning Definition unless ORS can show otherwise.

WE would also like to point out that through their evidence gathering there are 58 either vacant or pitches with occupants that do not meet the planning definition so if they were to be utilised then all bar 36 pitches of the 94 are already available or could be made so if housing was found for those not meeting the definition and certainly within the plan period.

No evidence is produced to show the **mortality rate** for those in current occupation which will also add to the number of pitches available.

9.16 Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for 94 additional pitches over the GTAA period.

Disputed. See Above reply to 9.15

9.18 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed

Agreed however the question has to be asked why they were not available on 3 separate occasions and when word had spread that these interviews were taking place when Travellers are more than likely at their base of operation, which does question the assumption of Gypsy Traveller status for these purposes.

9.19 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, **no households meet the planning definition**.

9.20 This would suggest that it is likely that only a proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.

Agreed

Pitch Needs - Gypsies and Travellers that did not meet the Planning Definition

9.23 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016) and the revised NPPF (2018).

These need to be dealt with through a housing policy as opposed to the GTTS Needs.

9.24 Overall, there is need for 23 additional pitches for households that **did not meet the planning definition**. This is made up a current need for 2 pitches from households who are living on unauthorised developments, 6 for concealed or doubled up households/adults and 3 households on the waiting list

As these do not meet the planning definition for GTTS for Planning Purposes then **no additional pitch requirements** should be included, these should be dealt with by way of affordable housing policies.

24 It was possible to obtain demographic information for one household that identified these 2 concealed/double-up households through a proxy interview but it was not possible to assess them against the planning definition. 25 The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households. with a need to move to a permanent pitch. Future need is made up of 2 additional pitches for teenage children in need of a pitch of their own in the next 5 years and 10 additional pitches as a result of new household formation using a formation rate of 1.25% derived from the site demographics.

Proxy interviews are dubious, why were they not made available for interview and as such should be discounted from the study.

Travelling Showman Plots/Yards, ORS have produced evidence to show there are a number of vacant Plots/yards including 5 in Westbourne but we would argue the sites on Cemetery Lane are not suitable and this is borne out by the Travelling Showman's Guild.

Conclusions

9.30 The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

We believe there are flaws to the gathered evidence base including the exclusion of the Parish Councils.

9.31 In summary there is a need for 94 additional pitches in Chichester over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 28 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

need for 23 additional pitches for Gypsy and Traveller households who did not meet the planning definition.

We believe we have shown this figure to be far in excess of those needed especially when you consider the number of Vacant plots and those that should be made available from those not meeting the definition. Nor is there reference to mortality rates which would also free up a number of Pitches. We believe the number of Non- Gypsy/Travellers by the planning definition is considerably higher than those found by ORS. (Certainly, within Westbourne).

9.32 It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from unknown or new households seeking to move to the area and develop a site should be addressed through a criterion based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).

Agreed

Travelling Showpeople

9.33 In summary there is a need for 29 additional plots in Chichester over the GTAA period to 2036 for Travelling Showpeople households that met the planning definition; a need for up to 5 additional plots for Travelling Showpeople households that may meet the planning definition; and a need for no additional plots for Travelling Showpeople households who did not meet the planning definition.

Needs revisiting in light of the empty plots/pitches identified

Summary of Need to be Addressed

9.34 Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

9.35 Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 40 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

This report is advocating the potentially doubling of pitches in the plan period

Westbourne PC firmly believe this figure to be highly inflated for the reasons we set out in the previous notes made on the findings of the Report. Especially when consideration is given to current vacancy rates and potential release of accommodation from those not meeting the Planning Definition nor mortality rates.

Overall many of these sites are no more than 'PARK HOME' Developments and do not need the benefits of the relaxation of Planning as bonafide Gypsy/Travellers enjoy.

Westbourne Parish Council observations on report by ORS regarding GTTA Housing Needs

Questionnaire; Observations

Questions A9,11,12, Closed Questions

Questions C, D, E appear to assume the occupants are Gypsy/Travellers it would be more appropriate to ascertain their 'Travelling credentials before moving on to these.

However D1, 4 closed questions and the others are multiple choice.

Section E, Questions 1,3,4,5 closed Question, 2, Leading- multi Choice

Section F Travelling

Question 1 Multi Choice,

Question 2 Multi Choice,

Question 3 Open but with Multi Choice answers so easily manipulated by the interviewee.

Question 4 Multi Choice with the add on how long? Needs interrogating more not simply work, what type of work, how do you advertise, where do you advertise, what do you have to show that you live away for long periods at a time, what sort of documents paperwork do you keep? etc etc

Question 5. Where do you stay when away from this site, who do you travel with? Where can we contact to confirm you stayed there? etc etc The way the ORS question is posed it is open to manipulation by the interviewee.

Question 6a should be; What reasons are there why you aren't travelling at the moment. As opposed to are there any reasons you don't travel at the moment.

Question 6b, should be, When, was the last time you travelled and for what reasons; as opposed to Have you or family members ever travelled---It's a closed Question

Question 7a & b could then read; What was the purpose of the travel and where did you go? How long were you away for?

Question 8 leading multi choice answer open to manipulation by the interviewee.

Question 9 Closed Question

Question 10, OK

Question 11 closed question would be better asking it in an open Question using; Who, what, when, why, where, how.

**Westbourne Parish Council observations on report by ORS regarding GTTA
Housing Needs**



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PART B

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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

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



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How to use this form

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PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Cllr Roy Briscoe	
Address	Bumble Bee Cottage, Duffield Lane, Westbourne,	
Postcode	PO10 8PZ	
Telephone	01243 696 376	Mob; 07877070591
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 ☐

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PART B

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pgs. 29 to 42 Especially Pg42	Policy Reference:	S1 to S6 Inclusive S6
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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:

Settlement and Housing Issues : Policies S1 to S6 Inclusive

The overall settlement hierarchy identifies Westbourne as a Service Village and in these locations' neighbourhood plans are encouraged.

The distribution of new dwellings over and above existing allocations or permissions confirms that there are no new allocations planned for Westbourne. The Parish Council can endorse this with enthusiasm, it recognises the restrictions and difficulties with development and sustainability issues in the Settlement area.

The approach seems to recognise that there are limits to what can be achieved by way of new allocation sites within and around Westbourne and the Parish confirm that this is a position that we have also found to be the case in our work on the Neighbourhood Plan.

Policy S6 sets out an approach to affordable housing with a series of criteria. Again, these seem sensible and can be endorsed by the Parish Council.

What improvements or changes would you suggest?

The Parish Council will support CDC in their Policy of Exception sites, in our Neighbourhood Plan we came across significant issues of where housing could be met, this policy of Exception Sites gives us the opportunity to deliver some much-needed affordable housing, which isn't forthcoming from the small developments we have taken.

The recognition of Community Land Trusts is also therefore endorsed as a vehicle to deliver such housing.

Has any consideration been given to allowing a small number of self-builds or building a couple of properties on these exception sites at market price as a revenue model to facilitate the delivery of the affordable houses we need through the CLT?

(Continue on separate sheet if necessary)

Declaration

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Name (<i>print</i>):	Cllr Roy Briscoe
Date:	31 st Jan 2019



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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pg 142 & Pg 42	Policy Reference:	DM 4 and S6
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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:

Supporting Community Land Trusts and Exception Sites : Policy DM4 & S6

There are new policies included in the Local Plan Review that encourage the formation of Community Land Trusts as a way of providing affordable housing and low-cost workspace within local communities where traditional policies have previously failed to meet these local needs. These seem to be innovative and welcome approaches that strongly support the objectives of the Parish Council as set out in its Neighbourhood Plan and in its Business Plan we endorse and support their inclusion supported.

Policy DM4 is also a new policy approach that seeks to allow the approval of development for affordable housing on exception sites provided that they are outside the settlement boundary but not remote / isolated and they are modest in scale and 100% affordable houses retained in perpetuity for this purpose. This is again directly supportive of the Parish Council's objectives and should be welcomed.

What improvements or changes would you suggest?

Westbourne Parish Council will support CDC in their Policy of Exception sites, and CLT's in our Neighbourhood Plan we came across significant issues of where housing could be met, this policy of Exception Sites gives us the opportunity to deliver some much-needed affordable housing, which isn't forthcoming from the small developments we have taken. There are significant issues in Westbourne regarding Flooding, partly being inside the SDNP and other sustainability issues which are prohibitive of development. The recognition of Community Land Trusts is also therefore endorsed as a vehicle to deliver such affordable housing.

We commend the inclusion of this Policy and its narrative

(Continue on separate sheet if necessary)

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pg 49 and 50	Policy Reference:	S9 and S10
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support **X**

Object ☐

Have Comments **X**

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

The Shopping Centre Hierarchy: Policies S9 and S10

The Local Plan Review includes a Shopping Centre Hierarchy in Policy S9, with a sequential approach to the provision of new retail floorspace. Westbourne is included in this hierarchy as a village centre, to be defined in the subsequent Neighbourhood Plan.

This seems like a sensible approach and can be supported by the Parish Council.

It will encourage the safeguarding of Westbourne as a village centre and supports its vitality and viability as a local centre for services and shopping.

Policy S10 is a complementary policy and again which we support.

What improvements or changes would you suggest?

Westbourne Parish Council will support CDC in their Policy of Shopping Centre Hierarchy.

However, there is a policy issue that could be raised by the Parish Council and included either in Policy S9 or S10 which is to actively encourage the physical improvement or enhancement of the public realm in Village Centres.

Especially for villages like Westbourne with many listed and heritage buildings as well as a Conservation Area which suffers from through traffic and a lack of effective management of the use of its main public space ie The Square.

We would welcome some additional wording to the policy along these lines as well as perhaps including some wording that will enable us to develop a Car Park to enhance the Village centre.

(Continue on separate sheet if necessary)

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Date:	31 st Jan 2019



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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pg 90 and 191	Policy Reference:	S30 and DM29
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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:

Biodiversity and Strategic Wildlife Corridors : Policy S30 and DM 29

These policies S30 and DM29 are intended to protect and enhance biodiversity.

The policy includes the concept of strategic wildlife corridors that are intended to protect biodiversity and provide protected routes along which wildlife can easily move. These corridors tend to link the coast with the South Downs and there is one which comes directly through the Westbourne broadly following the line of the River Ems.

We welcome the concept of these wildlife corridors which will not only assist in preventing unsuitable dense development, lacking in open space but will also actively promote the protection of species such as birds and bats that are a feature of local biodiversity in the village and need protected habitats and quality open space to pass through.

This is an innovative Policy which we very much endorse and support. These corridors are valuable open spaces which fit beautifully with the Character of the West Sussex villages like Westbourne. As it roughly follows the route of the river Ems it is in an area considered unsuitable for development in any case due to potential flooding but it will protect the Bio-diverse area it serves.

What improvements or changes would you suggest?

Westbourne Parish Council will support CDC in their Policy of these Corridors and should commend CDC for taking them into consideration.
There has obviously a lot of thought and work gone into developing these strategic routes thank-you

(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:	31 st Jan 2019



Representation Form

Local Plan Review: Preferred Approach Consultation

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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**)
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- 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	Bumble Bee Cottage, Duffield Lane, Westbourne,	
Postcode	PO10 8PZ	
Telephone	01243 696 376	Mob; 07877070591
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:	Pg 133	Policy Reference:	SA13
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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:

Although we understand there are considerable pressures on CDC to allocate significant amounts of Housing to meet the needs according to the Government this Strategic Site Allocation poses a significant threat to Westbourne.

In Southbourne's Neighbourhood Plan they allocated the housing requirements for the 1st CDC Local Plan south of the Railway with easy access to the A279. Southbourne have been given a significant increase in the housing numbers required. That in turn means that locations North of the Railway will have to be considered.

Access to the A279 will therefore be restricted for a minimum 20 mins in every hour due to the railway crossing being closed. That in turn will result in traffic diverting to avoid the crossings and travel through our small Village centre along narrow and unsuitable lanes especially Whitechimney Row which in parts only allows one vehicle at a time along it. It will seriously increase traffic through the village and result in Road Safety issues as well.

In order to alleviate this issue can the Policy include a mitigation against such issue by ensuring a Road bridge is built over the Railway in Southbourne, allowing easy access to the A279 without having to add to the congestion in Westbourne.

What improvements or changes would you suggest?

Westbourne Parish Council would ask that the Policy at number 4 on Pg 133 be strengthened to include that any developers North of the Railway be required to contribute to a road bridge over the railway. Any development North of the Railway will be opposed unless this new connection over the railway is being developed.

(Continue on separate sheet if necessary)

Declaration

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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 ☐

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pg 88 and 89	Policy Reference:	S24
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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:

Westbourne Parish Council support CDC in this policy but would perhaps like to see it strengthened. The Strategic Countryside Policy S24 set out to protect the Countryside from inappropriate development. In looking at the Chichester area it is full of small settlements and Hamlets all with their own distinct qualities. It is important that this is not lost, you travel through a village into 'Countryside' before encountering another little rural village, leaving into some lovely countryside etc etc.

Pg 88 refers to Countryside and Countryside gaps, we very much support this principle as it helps the villages and hamlets retain their individual identities, whilst protecting the landscape, character, quality and tranquillity of our valuable countryside.5.36

5.37 recognises the diminishing resource of Countryside, with Brexit looming we will no doubt have to consider increasing food production so the protection is very valid. The plan seeks to develop the 'Countryside' to improve the lot of all our Communities especially the small rural communities by allowing some small-scale development 5.38

At 5.42 Pg 85 there is a narrative supporting the idea of Gaps to prevent Coalescence of Villages and Hamlets, having come from a built up area in Stockport outside Manchester I can't begin to explain how important this is, it helps build strong communities and villages very defensive of their village assets, it also provides for the beautiful and varied Villages a landscape character recognised in West Sussex, to lose that would be a travesty. So, Westbourne Parish Council will strongly support this policy. However, the Text in the S24 Policy itself could do with something to re-enforce the narrative and recognise the Gaps or 'Spaces' between settlements as having value and in need of protection.

What improvements or changes would you suggest?

Westbourne PC have recently been informed of an inspectorate decision regarding an application in the Meon Valley which the appeal was dismissed in the narrative it says; *Whilst strategic gaps are not specifically referred to, it endorses the creation of high-quality places, which would include respecting the pattern and spatial separation of settlements.* We believe this could reinforce your Policy and some form of wording along these lines in the Policy may help at any appeal.

(Continue on separate sheet if necessary)

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Page/ Paragraph Number:	Pg 88 and 89	Policy Reference:	S24
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support **X**

Object ☐

Have Comments **X**

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

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What improvements or changes would you suggest?

Westbourne Parish Council would ask that this Policy be strengthened at bullet point one to set out that the identity of individual Villages and Hamlets should be protected by ensuring there is no coalescence and that the integrity and character of countryside between them is maintained. If we can assist in the development of these gaps we would be pleased to assist. It is obvious a lot of work and thought has gone into this Plan we would like to thank those that have been instrumental in its development.

(Continue on separate sheet if necessary)

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