



Valerie Dobson
Principal Planning Officer
Chichester District Council
East Pallant House
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West Sussex
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24 July 2017

Dear Valerie,

Subject: Westbourne Neighbourhood Development Plan 2017-2029, Regulation 16 Submission Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the submission version of the Westbourne Neighbourhood Development Plan (WNDP). The National Park Authority welcomes the publication of this plan, which is the result of a considerable amount of hard work by the parish council and the local community.

Please find attached our formal response. Please do get back to me if you have any queries on this representation.

Yours Sincerely

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SDNPA Response to the Regulation 16 Consultation on Westbourne Neighbourhood Development Plan

Para/Page	Comment
1.2.2	The SDNP Local Plan will be published for Pre Submission consultation in the Autumn 2017. The SDNPA request that the statement in paragraph 1.2.2 is updated to reflect the advance stage of the SDNP Local Plan. The paragraph refers to the adoption of the plan in July 2018, the SDNPA do not require any change to this proposed date for adoption.
4.2.5, Policy OA1	The SDNPA would welcome the policy criteria including reference to the South Downs National Park in bullet point 3 of the policy to ensure applicants are aware of the National Park status which affects part of the Neighbourhood Plan designated area
4.2.5, Policy OA1-2	Point to of this policy requires 'compliance with all other policy requirements of the development plan, the SDNPA highlight this particular part of the policy as it may not be considered appropriate or proportionate for the Policy to require compliance with all other policies in the Development Plan, it may be more appropriate to require compliance with all relevant policies of the Development Plan.
4.5.2, Policy OA3	Section 4.5.2 of this policy requires a marketing exercise to be completed for 12 months. This paragraph states that this is a policy requirement for Policy OA2 and OA3. The SDNPA would recommend that this policy requirement is clearly stated in Policy OA2 if it is a requirement for that policy. It is not sufficient to reference the policy requirement in a separate policy.
4.6.13 – 4.6.18	<p>The SDNPA would welcome reference to the SDNP Local Plan and relevant evidence base relating to Gypsies and Travellers and Travelling Showpeople in this section of the NDP. Text below could be used to provide a clearer picture of the need and SDNP approach relating to this matter:</p> <p>The Coastal West Sussex (Adur, Arun, Chichester & Worthing) Gypsy and Traveller Accommodation Needs Study identified a need for 6 pitches for Gypsies and Travellers and no plots for Travelling Showpeople within the South Downs National Park part of the study area. Since the completion of the study 16 pitches have been supplied within the National Park. In addition it is expected that 2 pitches will become available through the movement of people to bricks and mortar accommodation. This results in the provision of 12 pitches above the identified need of 6 in the period to 2027. Therefore there is currently no identified need for further sites within the Coastal West Sussex part of the National Park.</p>
4.6.25, Policy OA4-2	<p>The SDNPA acknowledge the support for the approach adopted by the Authority and the proximity of Woodmancote and Westbourne to the National Park. However, the SDNPA policy is not within an adopted plan and still subject to public consultation and Examination. Currently the draft policy reads as follows:</p> <p>Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople</p> <p>I. 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.</p>

Para/Page	Comment
	<p>2. The SDNPA 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:</p> <ul style="list-style-type: none"> a) 13 pitches in that part of the National Park located in Brighton & Hove; b) 8 pitches in that part of the National Park located in Lewes District; c) 11 pitches in that part of the National Park located in East Hampshire and Winchester Districts. <p>3. Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in <i>Planning Policy for Traveller Sites (2015)</i> or any subsequent policy) will be permitted where they:</p> <ul style="list-style-type: none"> 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. <p>4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.</p> <p>If the criteria set out at part 3 of draft policy SD33 are supported by the Westbourne NDP group they should be included within the NDP policy and evidenced accordingly. Reference to a policy of another planning authority will not be given any weight in the determination of planning applications.</p>
	<p>The SDNPA will be working with Chichester and the other Coastal West Sussex Authorities as and when GTAA's are updated and sites plans prepared. The SDNPA support the need for Chichester District Council to progress with the Gypsy & Traveller Site Allocations DPD. Experience shows that the lack of progress of such plans in other areas adjoining the National Park has led to sites being granted permission within the National Park at appeal due to a lack of supply.</p>