

## **West Wittering Neighbourhood Plan 2019 to 2029 Approved for Submission 3 February 2022 (16/02/2022) – Consultation on Submission Plan (March 2023) (Regulation 16)**

### **Chichester District Council Response**

The Parish Council and Neighbourhood Plan Working Group have spent considerable time in compiling evidence and drafting the West Wittering Neighbourhood Plan 2019 to 2029 Approved for Submission 3 February 2022 (16/02/2022) (NP). It is acknowledged the Parish Council (PC) has responded to changing circumstances and addressed these in a positive and proactive way. The document itself is well written, clear and the policies are in general focused and precise. The document includes a range of different maps and where it is considered improvements and clarity can be enhanced then suggestions are made below.

Page 9: The coastal edge of West Wittering is part of the Solent Maritime Special Area of Conservation (SAC).

Page 14: It would be helpful if the figures could be updated for the 2021 census. In that respect the following link is of assistance: [West Wittering \(Parish, United Kingdom\) - Population Statistics, Charts, Map and Location \(citypopulation.de\)](https://www.citypopulation.de/en/west-wittering/)

Page 16: para 3.1 – text could be brought up to date as this is now the neighbourhood plan's submitted vision.

Page 17:

Objective 15 – this should also include reference to West Wittering Estates and Chichester District Council (CDC).

Objective 19 – amend to read 'support provision of high speed fibre broadband' as the PC is not a provider itself.

Page 19: Policy WW1 Design

Final sentence should also include text to read "*subject to other relevant development plan policies*" to clearly refer to the sentence supporting zero energy buildings as well as design, form and detail policy.

Include reference to Appendix 1 after the words Village Design Statement in line 4.

Map 3 is not clear and requires a key to identify the various areas, what they relate to and their relevance to the policy.

Page 20: Preventing Coalescence

Para 4.5 - This paragraph refers to additional public consultation, which has taken place to provide further evidence to support Policy WW2. However, public consultation results alone are not considered adequate to support the need for Policy WW2. There is no clear evidence to identify why this particular part of the parish warrants protection over other parts of the

parish. The use of settlement policy boundaries to effectively control the growth of settlements will provide adequate protection for this area.

Page 20: Policy WW2 Preventing Coalescence

CDC has indicated to the Parish Council it appreciates the concerns the parish has to avoid the coalescence of the two parts of built form in the parish (West Wittering village and the area on the eastern edge of the parish nearer to East Wittering). However, there remains little development pressure that might result in the loss of the significant area of countryside that currently lies between these two areas. On this basis and without any significant justification for the inclusion of this area as green gap, CDC does not support this policy.

Page 21: para 4.6 line 4 – insert ‘in’ after ‘Service Village’.

Para 4.7 - text is not necessarily relevant here and inaccurately refers to the Interim Policy Statement for Housing (IPS) no longer being applied.

Para 4.7 – the text is helpful as it outlines the reasoning behind the inclusion of the policy. However, Policy WW3 would be better suited to guiding windfall development within settlement boundaries as the plan itself does not address or identify allocations for housing. As worded the policy is seeking to guide all housing development.

Page 22: Map 5 Settlement boundaries

Is the map intended to form part of a policies map? It would be helpful if the policy (Policy WW3) could refer to the identification of the settlement policy boundary (SPB) as set out in Policies Map 5. This would provide a clear indication of where the SPB lies. Development within that SPB boundary could then be guided by a redrafted criteria based Policy WW3. However, as worded the policy has a wider remit beyond the SPB and includes criteria that are inappropriate for inclusion here (see further comments below). Consequently, if the intention is to provide guidance for new housing development in the SPB then some redrafting is required as indicated below.

Policy WW3 Housing Development in West Wittering Parish

Criterion a) – remove reference to East Wittering as this is outside the NP designated parish area.

Criterion b) – this relates to matters of national and local plan policy and should be removed.

Criterion c) – suggest this is re-written to refer to development within settlement boundaries; it should be noted that East Wittering is outside the NP designated parish area albeit that development in West Wittering parish has the potential to adjoin the East Wittering SPB.

Criterion d) – if policy is re-written as suggested then this criterion would no longer be required as development would be within the SPB.

Criterion e) - support intention of policy to deliver a mix of housing types but consider requirement of 30% as bungalows is unjustified and does not encourage making provision for a range of needs to include for a younger demographic in accordance with the objectives of the plan. Policy should be amended to refer to 1, 2 and 3-bedroom properties and some bungalows subject to site circumstances and constraints

In general, CDC consider it would be preferable to rely on adopted Local Plan Policy 34 Affordable Housing. However, the comments below are relevant to the draft NP policy.

Support inclusion of Community Land Trusts (CLT's) as a mechanism to deliver affordable housing, however, the policy should also refer to Registered Providers who are able to acquire and manage any affordable housing. CLT's can take time to form, become established, build up financial viability and build membership. Although it is appreciated this mechanism secures affordable housing in perpetuity, it may result in the loss of, or restrict the provision of, affordable housing if no other options are available.

In relation to the inclusion of 'rents that local people can afford', is not entirely clear how this will be established and may be skewed by the demographics of West Wittering. The definition of affordability is defined nationally. If this were to be taken forward, we would recommend linking it to the Annual Survey of Hours and Earnings (ASHE) lower quartile earnings for Chichester as we are concerned that a link to local earnings may be skewed by the higher number of retired persons and second homeowners.

Page 23: para 4.8 - Policy DM4 is now Policy H7 in the Publication version of the Chichester Local Plan 2012-2039: Proposed Submission (Regulation 19) published for consultation on 3 February to 17 March 2023.

Page 24: para 4.10 - 3rd sentence - amend to read 'Similar policies have been carried through into the Chichester Local Plan 2012-2039: Proposed Submission (Regulation 19).'

#### Policy WW4 Replacement Dwellings

Unable to support this policy as no evidence is provided to demonstrate how the loss of small units (1 or 2 bedroom) and bungalows could be resisted.

#### Page 25: Policy WW5 Principal Residence Requirement

CDC appreciates the concerns of the PC, is sympathetic to local community views in relation to this issue and is aware of the introduction of such a restriction in areas in Devon and Cornwall.

The Background Evidence Paper (14 April 2022) sets out local survey work undertaken in relation to this issue. This suggests the percentage of second homes has increased from 18.7% (2011) to 20.1% (2021). This compares with a second home portion in St Ives of 25%, and Salcombe of 35.45% in 2016, where similar policies have been introduced. With regard to Newton and Noss NP area, surveys showed in September 2016 that 18.4% of all properties were second or holiday homes, with Noss Mayo representing a 'hotspot' with 36%.

Taking this into account and acknowledging that such a policy has been used elsewhere to address similar issues of second homes, it may be regarded as similar tool here, although it is suggested further text is included to clarify and state whether or not the policy applies to housing allocations and/or windfall sites.

#### Page 25: Policy WW6 Visitor Accommodation and Facilities

This would provide difficulties as the change of use of private dwelling houses for short term lets does not need planning permission.

#### Page 27: Policy WW7 Economic Development

There is concern about the inclusion of this policy. The adopted LP policy supports economic development but only where the buildings are capable of conversion. The text here of 'conversion of agricultural or other rural buildings' could easily open up the likelihood of inappropriate buildings being converted.

Question if the intention is for the criteria for small micro buildings to relate to brownfield, agricultural buildings and other rural buildings? It is not clear as written, agricultural buildings are not brownfield.

Equally it is not clear if 'small/micro' is to have the same weight as 'up to 10 employees' – policy would need to make sure that both criteria were relevant and the definition of 'small and micro' was sufficiently robust. There is potential for a very intensive and large storage use which has less than 10 employees via this policy.

#### Page 27: Policy WW8 Retail Facilities

Whilst it is acknowledged local retail provision remains a key concern for small villages, there is little national or local plan policy to lend itself to the definition of the local parade as defined in Policy WW8 for retail facilities. Adopted Chichester Local Plan Key Policies: 2014-2029 (CLPKP) Policy 29 provides some protection for such uses, allowing changes subject to appropriate marketing for instance. However, since the adoption of the CLPKP, the move nationally and locally is generally away from defining small defined parades and this is reflected in the direction of travel of the new Local Plan where no such parades have been identified. While there may be some overall benefit and value for such provision in the local area, there is the risk this would in any case have the potential to be undermined by recent changes to the Use Class Order, a point acknowledged in the text of para 4.17.

#### Page 29: Policy WW9 Public Rights of Way and Quiet Lanes

It would be helpful if the relevant map reference was added to the policy, i.e. Map 7 and the maps were at a larger scale. The last sentence of the policy would be difficult to assess and use as a reason for refusal and should be removed.

#### Page 34: Policy WW11 Biodiversity, Geodiversity and Mitigating the Impacts of Climate Change

In terms of the wording of the policy, biodiversity net gain should be achieved in accordance with the requirements of the relevant legislation and national policy, consequently it may be considered this policy is not necessarily required.

#### Page 35: Policy WW12 Community Facilities and Open Spaces

There is no indication as to how the need for the retention of a community facility would be assessed; suggest amending to include reference to the Appropriate Marketing Guidance in Appendix E the CLPKP in this respect.

#### Maps:

There needs to be clarity in relation to the inclusion of maps within the document, which maps are formal policies maps and which are intended rather as information to support the content of the plan. For example, a clear large scale comprehensive policies map would be beneficial to clearly identify the settlement boundary and other relevant policies for users and readers of the plan.

#### Appendix 2: West Wittering Village Design Statement 2006 Revised 2022 (VDS)

CDC has previously advised there are different CDC procedures, rather than the NP process, that the VDS can go through in order to be recognised in the planning process. However, the Parish Council has been keen to see the VDS included as an appendix here and CDC is aware there are instances elsewhere where this approach has been followed.

Page 9 of VDS: the coastal edge of West Wittering is part of the Solent Maritime Special Area of Conservation (SAC).

Page 18 of VDS: para 16 - refers to Settlement Policy Areas – the reference is more appropriately to settlement policy boundaries, however, consider this advice and guidance goes beyond the remit and purpose of a VDS and should be removed.

Page 19 of VDS: para 21 – this goes beyond the remit and purpose of a VDS and should be removed.

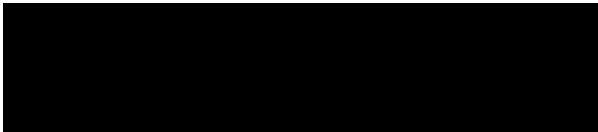
### **Exercise of Delegated Authority – Director of Planning and Environment**

I hereby exercise my delegated power in accordance with Chichester District Council's Constitution:

'to make formal comments on a draft Neighbourhood Plan at Pre-Submission stage and Submission stage'

AND DETERMINE THAT, the above comments are the formal response made by Chichester District Council on the **West Wittering Neighbourhood Plan 2019 to 2029 Approved for Submission 3 February 2022 (16/02/2022)** in relation to comments made under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended by The Neighbourhood Planning (General) (Amendment) Regulations 2015).

Signed:

A solid black rectangular box redacting the signature of the Director of Planning and Environment.

**Director of Planning and Environment**

Date: 6 March 2023