

## West Wittering Neighbourhood Plan – Regulation 14 Representations

Part of SEA	Responder	Response	Recommended Action
General	CDC	<p>One main concern is that the plan is somewhat unclear as to whether it is being prepared in relation to the adopted Chichester Local Plan: Key Policies 2014-2029 (CLPKP) or to the new Local Plan Review (LPR). For example, is the intention to over provide in terms of housing provision in relation to the adopted CLPKP or rather to be running in line with work on the LPR as discussions between CDC and the parish have been to date? As has been advised there remains uncertainty over the proposed housing figures to be included in the LPR and therefore the parish will need to be clear on the expectations of the community in this respect and in terms of the potential for a NP to become out of date quickly if it runs ahead of the LPR. . This position has been expressed to parishes as the proposed housing numbers have yet to be confirmed for the submission version of the LPR, this will not be considered for testing until later this year. CDC would be happy to discuss this further with the NP group.</p> <p>In terms of the difficulties around the impact of Coronavirus on the consultation, CDC has advised that there will be a need to consider further the implications for the formal neighbourhood plan process.</p>	<p>The WWNP has been prepared to be in general conformity with the adopted Chichester Local Plan: Key Policies 2014-2029, but having regard to the evidence and draft policies in the emerging Local Plan. Planning Practice Guidance says that “Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan... Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested” . Paragraph: 009 Reference ID: 41-009-</p>

			<p>20190509 Revision date: 09 05 2019.</p> <p>Impact of Coronavirus lockdown on consultation to be assessed once comments are in and have been analysed.</p>
	Natural England	<p>Water quality impacts from sewage discharges Chichester District Council's Supplementary Planning Guidance on Waste Water Treatment shows that West Wittering connects to Sidlesham WwTW, which discharges to Pagham Harbour SPA/Ramsar via Broad Rife. At this time the evidence base for Pagham harbour is not sufficient to demonstrate that eutrophication is impacting the designated site features. However Natural England wish to note that investigations (to be carried out by Southern Water as part of the Asset Management Plan process) into Pagham harbour water quality are planned with completion by 2022. The output of these investigations may have implications for future development connecting to Sidlesham WwTW. For example a nutrient neutral approach may be required to avoid an adverse effect on the integrity of Pagham Harbour, in the same way as currently required for developments connecting to treatment works that discharge to Chichester Harbour.</p>	<p>Check with NE whether this is a matter for the HRA or whether they are recommending additional criteria for the allocation policies.</p>
	Environment Agency	<p>Whilst the Environment Agency are a statutory consultee we have prioritised our input to Neighbourhood Plan areas where the environmental risks are greatest. From a review of your draft Plan noting only 2 allocations we have no specific comments to make. However, please find attached our checklist to support Neighbourhood Plans in the Chichester District.</p>	<p>Noted.</p>
	WSCC	<p>General advice  In considering the Neighbourhood Plan for West Wittering, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.  The overall level of development proposed in the West Wittering Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot</p>	

		<p>be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the West Wittering Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for West Wittering.</p> <p>The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.</p> <p>The County Council have no overriding concerns about the transport impacts of the West Wittering Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for West Wittering includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.</p> <p>The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:  <a href="http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx">http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx</a></p>	
	David Leigh Boyd	Supports Plan	
	Nicolette Pike	Supports Plan	
	Richard Pike	Supports Plan	

	Graham Capon	Supports Plan	
	Ann Tyler	Supports Plan	
	Len Tyler	Supports Plan	
	Pauline Craven	Supports Plan	
	Wendy Gray	Supports Plan	
	Deborah Wills	Supports Plan	
	Phillip Wills	Supports Plan	
	Jordan Swinscoe	Supports Plan	
	Wendy Anderson	Supports Plan	
	Alex Anderson	Supports Plan	
	Heather Toms	Supports Plan	
	Portsmouth Water Catchment management	<p>Thank you for consulting the Catchment Management Team on this neighbourhood plan, the area of interest is not located in a groundwater source protection zone and therefore from a groundwater quality protection perspective we have no adverse comments to make on the plan.</p> <p>This consultation has been forwarded to our Developer Services department in case they wish to comment.</p>	
<b>Page 3</b>	Keith Martin	Describing Neighbourhood Plans as a “new type of document” seems dated for 9 year old legislation. <b><i>Suggest that NPs are a form of planning policy that enables local people ... Grammar: change contain to containing.</i></b>	
<b>1.1</b>			
<b>1.2</b>		It was not a CDC initiative to designate the area for West Wittering’s NDP. <b><i>CDC were responding to an application made by WWPC in 2013 for the parish boundary to determine the area for a NDP proposal.</i></b>	
<b>1.9</b>		The verb “made” is used as an adjective. <b><i>Suggest an “adopted” Neighbourhood Plan.</i></b>	
<b>Title of document and plan period</b>	CDC	The plan is indicated to cover the period 2019-2029 which is incorrect. The plan period for LPR is currently up to 2037. As stated above this will need to be taken into account throughout references in the NP and SEA work.	See explanation above. 2019-2029 aligns with the currently adopted Local Plan.
<b>West Wittering</b>	CDC	There are other procedures that would enable this document to be advanced quicker and for revisions to the VDS to be progressed. CDC can advise on this	Discuss with CDC

<b>Village Design Statement (VDS) (currently included as Appendix C):</b>		further. It is therefore suggested the VDS is removed from the NP document itself. Policies and text could then make reference to the most up to date VDS to allow flexibility and regular VDS updates to be taken into account.	
<b>Page 2: Foreword</b>	CDC	Second para, line 5 – the NP area was designated in 2013 not 2017, as stated in para 1.2.	Amend as suggested.
<b>Page 4: National and Local Planning Context</b>	CDC	This section needs to reviewed and updated in light of the comments made above relating to the need for the NP to be in accordance with either the CLPKP or the LPR. This includes the references to the Site Allocations DPD in para 1.7 which is the daughter document of the CLPKP.	See explanation above. Include this within this section.
<b>Page 5: Strategic Environmental Assessment (SEA)</b>	CDC	As yet the final proposed housing numbers have not been confirmed for the LPR. As indicated above for this reason CDC has encouraged parishes to be cautious in progressing their work too soon.	Discuss with CDC
<b>Page 8: Para 1.19</b>	CDC	The reference to 50% would read better as ‘50% of those who voted’.	Amend as suggested.
<b>Page 9: Section 2 Parish of West Wittering</b>	CDC	The historic environment appraisal needs to include consultation of the Chichester District Historic Environment Record, which is a more comprehensive record than the WSCC HER, particularly the version accessed via Heritage Gateway. For West Wittering parish the CD HER has 116 entries, including 31 designated (1 SM and 30 LBs) and 85 non-designated (including 31 farmsteads). Of particular interest are entries 7759 and 7986, which record the discovery of Roman pottery and a Neolithic axehead at Walnut Tree Caravan site (development site No. 2). Any proposal for significant development should include a consideration of the potential effect on the archaeological interest that the site might contain, followed by assessment and evaluation and further mitigation measures as appropriate. This	Amend as suggested.

		would generally be applied, in line with national guidance (NPPF), through the normal planning process, but it would be as well to have a general statement along the lines of objective F in Policy WW3a but with some improved wording.	
	Historic England	Section 2.1-2.8 discusses the history of the neighbourhood plan area and there is a list of listed buildings included at Appendix B. The list of listed buildings should also include the grade (GI, GII* & GII) of the assets, with a separate category for scheduled monuments, i.e. Cakeham Manor. These should also be mapped.	Amend as suggested. FB
<b>2. The Parish</b>	Keith Martin	The tale that the boulders in Snowhill Creek were used as ballast in Roman Galleys is highly improbable to some experts. <b><i>Geologist describe the boulders as glacial erratics left after the last ice age receded 10,000 years ago.</i></b>	
<b>2.2</b>			
<b>2.16</b>		The reference to “holiday parks” omits any numbers. <b><i>The year-round impact of people living or staying in mobile homes is very significant. The report should include the number (approx. 1,600) for comparison with dwelling numbers.</i></b>	
<b>2.17</b>		Seasonal workers do not justify more housing. <b><i>There are hundreds of caravans for holiday let.</i></b>	
<b>2.19</b>		The high cost of housing and lack of affordable housing are not the prime reasons for the relatively elderly age of the population. <b><i>The prime reason is lack of jobs. Young people need housing close to employment and close to schools.</i></b>	
<b>Page 11. Para 2.11</b>	Stella Hadley (CME)	No mention of the initiative in 1950 when villagers purchased land to form West Wittering Estates and Cakeham Manor Estates in 1953.No mention of the work that CME carries out on biodiversity	
<b>Page 13: Parish Statistics</b>	CDC	The data from the census is now quite old, you may want to think about proofing this with some more up to date information.	Check whether any interim projections are available (next Census 2021).
	Mrs Jean Barrett	Table showing type of dwellings. Caravan or other mobile or temporary structure states 6. Are caravan parks not included?	Check, but presumably not classed as permanent dwellings. –
<b>Page 15: Vision and Objectives</b>	Historic England	Section 3.2 identifies a number of objectives that will help to realise the vision for the plan. Objectives 1, 2 and 3 are grouped under the heading ‘assets and treasures’. Objective 2 is: “To provide for a sustainable future for heritage assets and green spaces in the village by ensuring new development preserves and enhances them”.	Amend as suggested.

		<p>We welcome the aim of this objective but consider that the drafting is a little narrow and does not use the terminology used by the NPPF. We suggest changing ‘village’ to ‘neighbourhood plan area’ or ‘parish’, and ‘preserves’ to ‘conserves’. ‘Conserves’ accepts that some change may be unavoidable or even desirable to better sustain or reveal the significance of the assets.</p> <p>Objectives 10-13 relate to housing. In line with the increased emphasis on design in the NPPF 2019, we suggest these objectives could refer to ‘well-designed housing’.</p>	
<b>The Vision 3.1</b>	Keith Martin	<p>The prime reason is lack of jobs. Young people need housing close to employment and close to schools. <b><i>This should, at least, give “retaining the rural character of the village” as part of the vision. This matches the VDS and was the wording in consultations.</i></b></p>	
<b>3.2</b>		<p>Objective Facilities could be expanded. <b><i>Suggest that high speed fibre broadband to all properties should be added. This becomes ever more vital for both leisure and business communication.</i></b></p>	
<b>Page 17: Design</b>	CDC	<p>As indicated above for the reasons set out the VDS should be removed from the NP. Policy WW1 Design could then be amended to refer to the ‘most up to date’ VDS.</p>	Discuss with CDC
<b>4.4</b>	Keith Martin	<p>The Village Design Statement is briefly described as an attachment but lacks comment on its status. Where does the VDS stand? <b><i>It should be made clear that the VDS will carry at least the same weight as when it was originally adopted. Consultants suggested that it would be greater than before.</i></b></p>	
<b>WWI</b>		<p>“Having regard to the Chichester Harbour Management Plan where relevant” is too weak. <b><i>Adherence to the Harbour Management Plan policies and the associated Supplementary Planning Document should be essential requirements of any development in or close to the AONB.</i></b></p>	
<b>4.5</b>		<p>Retention of the gap between the two settlement areas is more than “protecting their respective identities”. <b><i>The gap is an essential part of retaining the rural character of the village. This is the appeal of the village and an essential part of its tourism economy.</i></b></p>	
<b>Page 19: Policy WW2 Preventing Coalescence</b>	CDC	<p>CDC 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 is no 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</p>	Discuss with CDC

		justification for the inclusion of this area as green gap, CDC would not currently support this policy.	
WW2	Keith Martin	This policy is unacceptably weak. <b><i>Development within the Green Gap should only be permitted where there is an overriding public interest.</i></b>	
4.6		If the Local Plan target is 50, met by extant planning permits, why is there a proposal for 25 new dwellings? <b><i>My understanding is that the established housing needs of the village are met by the new houses already approved.</i></b>	
Page 21: Policy WW3a Allocation of Land at Church Road for 25 Homes	CDC	<p>This allocation represents a small part of a much larger site with the boundary and the landscape buffer arbitrarily identified and the landscape buffer somewhat unnecessarily deep. It would be better to identify a precise red line boundary for the whole site to include development for a minimum of 25 houses including a landscape buffer to the north. This would allow a more bespoke design solution to come forward for the site to help it relate well to the landscape to the north and the settlement, including potentially opportunities for wider connectivity to the north as well as the south indicated in the policy. The site as identified looks large to accommodate the 25 dwellings identified. In that respect it is worth noting the Government is seeking to make effective use of land (section 11 of the national Planning Policy Framework (NPPF)). In addition there may well be pressure for the site to be extended to accommodate a higher housing figure.</p> <p>Although the principle of Community Led Housing (CLH) (possibly Community Land Trust etc.) is welcomed the policy is overly restrictive in this respect. The wording would be improved to provide flexibility along the lines of: "The Parish Council will look favourably on schemes brought forward in partnership with a local CLH organisation that look to preserve the affordable housing quota in perpetuity." This will encourage developers to seek out a CLH organisation in the area but not restrict the option for a developer to work. Alternatively the wording could be transferred to the text with only the proportion of affordable housing identified in the policy. It would be helpful if the justification for the requirement for bungalows was evidenced in some way.</p> <p>Criterion c) suggest this may be improved by being less specific and more flexible to offer wider opportunities for 'net biodiversity' gain to be met.</p> <p>Criterion d) is aimed at the drainage network, not sure there is a need to include reference to the landscape buffer here.</p>	Discuss with CDC



	WSSC	<p>Policy WW3a criterion (e) and WW3b criterion (d) – it is noted these criteria refer to maximising connectivity between sites and development to south and East Wittering to ensure residents can walk/cycle to access facilities. The Parish should be noted that whether the site will be able to maximise connectivity will depend on site specific constraints, location of any existing footway/cycleway and proposals that come forward. Any planning application that comes forward will be assessed on its own merits.</p>	
	Historic England	<p>The neighbourhood plan proposes to allocate land at Church Road for 25 houses. Requirement (b) of the policy is for a landscape buffer to the north and west of the site to limit the impact of development on the wider countryside and the nearby grade II listed Thatched Tavern. Historic England supports the inclusion of this requirement, as necessary to conserve the setting of the Thatched Tavern, although we would recommend consideration of what this buffer would entail and how it would affect landscape views. Where there is considered to be potential for a development to affect landscape views we would, in the first instance, recommend considering how the character of the development, including its layout, scale, form and materials can best be guided to provide a harmonious response to the landscape setting. Put simply we would rather seek to secure a development worth seeing than try to hide an ugly one. This could include establishing an appropriate palette of materials and other design elements that reflect the local vernacular, or where more appropriate, modern materials and design considered suitable to the location. We recommend the steering group consider the site allocation in the Odiham Neighbourhood Plan<sup>1</sup>, which provides quite detailed requirements for design of new development proposals, as a useful model.</p> <p>Requirement (f) is for “any planning application to be accompanied by an archaeological assessment which includes on-site investigation works to demonstrate that the development can be implemented without causing harm to any archaeology on site.” While the area is not an archaeological notification area, there is some evidence of later prehistoric settlement in the immediate vicinity of the proposed allocation and the historic environment record results for this area have not, as yet, been set out in a map. Therefore, we consider requirement (f) is necessary to ensure any archaeological remains are conserved in a manner appropriate to their significance. Ideally the HER results should be mapped as part of</p>	<p>Check Odiham NP wording  Contact County Archaeologist to confirm whether pre-allocation investigations are required  Check CDC HER records</p>

		<p>the neighbourhood planning process. We recommend that the steering group have a detailed conversation with the Chichester City Archaeologist in the first instance to ensure the proposed approach is one that they would support. Elsewhere, where there has been doubt about the suitability of sites for allocation within neighbourhood plans, it has been seen that requiring the site owner, or their prospective development partner to commission an archaeological investigation that demonstrates what remains are present, if any, has provided a greater level of certainty on the site's development potential (or otherwise). Leaving this until later in the process in the past has caused considerable delay to the plan preparation process and need for considerable revision in more than one instance. Such requirements are consistent with the process expected for development site allocations promoted for local plans.</p>	
	Natural England	<p>Clause c) of policy WW3a states that the design of the development should demonstrate biodiversity net gain, with particular reference to habitats and species on site and impacts on nearby designated sites. Natural England recommends that net gain is separated out from impacts on designated sites as these two issues are subject to different policy and legislative requirements.</p> <p>In order for the allocation of housing on land at Church Road to avoid an adverse effect on the integrity of European sites, specific mitigation measures will be required. The site is within the zone of influence of Chichester Harbour and so mitigation for increased recreational disturbance will be required in line with Chichester Local Plan policy.</p> <p>The allocation site not identified in the Solent Wader and Brent Goose Strategy as a site known to be used for foraging by species that are features of the Chichester and Langstone Harbours SPA/Ramsar. However, any planning application for the site should consider impacts on foraging wintering birds and be supported by wintering bird/habitat surveys as appropriate.</p> <p>Water quality impacts from sewage discharges are discussed below. In terms of surface water quality impacts, Natural England's mapping system indicates that drainage ditches in the vicinity of the site discharge to the sea at East Wittering. Therefore, there would not be a likely significant effect from surface water drainage.</p>	Amend as suggested.
	Linda Hoadley	Local homes should include bungalows and no more second homes.	

	John Hoadley	Better standard of homes than Sandpiper Walk required Building Control not adequate.	
	Elizabeth Williams	More affordable homes to be built	
	Mirielle McGinn	Supports provision of bungalows	
<b>4.9</b>	Chris Hardy	25 homes in Church Rd unacceptable, speeding traffic in Piggery Hall Lane, damage to environment. Must not build on agricultural land. Housing will damage the environment. Should build in village centre,	
<b>Ww2 – para 4.9</b>	Will Ellsworth Jones	Should be 50% affordable housing	
<b>Page 22: Paras 4.10 and 4.11</b>	CDC	These sections refer to delivering the land at Rookwood Road as an exception site. However, a NP cannot allocate an exception site in a policy as it would no longer be an exception to policy.	Not an exception site, allocated for 100% affordable housing. Check other examples of where NPs have done this.
<b>Para 4.10</b>	Graeme Barrett	Change 2108 to 2018	Amend as suggested
<b>Page 22: Para 4.11 onwards</b>	CDC	Para numbers need to be revised and updated to take account of para 11a.	Para numbers will be reviewed once all changes have been made.
<b>Page 23: Policy WW3b Allocation of Land at Rookwood Road for 15 Affordable Homes</b>	CDC	This policy should be excluded from the NP and would be better brought forward as an exception site to support a CLH scheme. If left in the NP it will make delivery of the site difficult for a CLH group as the cost of land may be significantly more than if delivered through the exception site policy within the emerging Local Plan Review. It should also be noted that there are other potential exception sites that a CLH organisation could look into delivering. It also depends on whether the landowner is looking for an outright sale of land or a long lease; if the latter this would give rise to difficulties for the CLH organisation in guaranteeing the site remain affordable in perpetuity. In addition, it is also not clear how the aims of criterion d) would be achieved.	Discuss with Steering Group and CDC
	Historic England	The neighbourhood plan also proposes to allocate Land at Rockwood Road for 15 affordable homes. There are no designated heritage assets in the vicinity, but given that the HER has only been consulted at high-level, and not mapped, this allocation should include the same requirement (f), as is proposed in the allocation at Church	

		Road to be accompanied by an archaeological assessment, unless further detail can be provided demonstrating that it does not have potential for the presence of archaeological remains.	
	Natural England	<p>Natural England recommends an additional clause is added to Policy WW3b to address potential impacts on European sites and avoid an adverse effect on their integrity. The site is within the zone of influence of Chichester Harbour and so mitigation for increased recreational disturbance will be required in line with Chichester Local Plan policy.</p> <p>The Environment Agency's Catchment Data Explorer website indicates that at least part of the allocation site is within the surface water catchment for Chichester Harbour. Therefore, surface water run-off mitigation measures may be needed to ensure that pollution during construction and operation does not affect the European site.</p> <p>The allocation site not identified in the Solent Wader and Brent Goose Strategy as a site known to be used for foraging by species that are features of the Chichester and Langstone Harbours SPA/Ramsar. However, any planning application for the site should consider impacts on foraging wintering birds and be supported by wintering bird/habitat surveys as appropriate.</p> <p>The allocation site is adjacent to Chichester Harbour Area of Outstanding Natural Beauty (AONB), therefore, it will be important that any development on the site does not harm the setting of the AONB. Natural England recommends adding a clause to Policy WW3b to make this clear.</p>	Amend as suggested
	Rachel Buckland	<p>I strongly object to the proposed building development on this field for the reasons set below.</p> <p>There are other sites both allocated in the draft plan and currently un allocated(eg Second stage development of North Fields Summerfield Road) which would be much less impact on our carbon footprint and much less harmful to develop and would have the capacity for these 15 homes</p> <p>The site of the building is proposed lies with the in Area 6 outlying of the village design statement(VDS)</p> <p>In Respect of this area the VDS refers to development policies adopted by the Parish Council from the Chichester District local plan referred to as C1 ,H12 ,RE14 and RE 16</p>	Discuss with Steering Group

		<p>Paragraph 55 of the VDS states the outlying hamlets are a major contributor to the character of the area and need to particular strong control over any development or redevelopment</p> <p>Policies H 12 and R E 16 have a particular resonance in connection with this proposed development</p> <p>Policy H 12 wishes to prevent development that distracts from the real character and appearance of the area</p> <p>Policy R E 16, says that proposals must not be out of scale or damage the character of the visual qualities of its surrounding environment .it will not create ribbon development.</p> <p>This site ,size and bulk of the proposed buildings would have an adverse affect on the landscape ,the character of neighbouring properties and amenities of residence that it is detrimental and contrary to the principles set out in the village design statement</p> <p>I feel the impact of these buildings on this field would strongly be detrimental to the character of the village and I feel therefore there seems no justified reason to want or need to continue with this proposed development on this field</p>	
	Mireille McGinn	<p>P 23 and 24 Allocation of land at Rookwood Road</p> <p>It would spoil the approach of the village unless built sensibly in order to keep the countryside setting of our village. Build them like the Malthouse Cottages behind a small Green and a road parallel to Rookwood road, not straight on the road.</p>	Discuss with Steering Group
	Nunnington Farm	<p>With regard to the proposed planning re policy WW3b Land at Rookwood road for fifteen affordable housing. I I was always of the understanding that the area between Malthouse Cottages and West Wittering village was to be kept as a ‘green’ area to protect the village from over development and to keep the natural beauty of the village. Over the years any development in and surrounding our village has been sympathetic to it’s natural beauty. I hope we are not going to spoil it now for future generations.</p> <p>I own the campsite at Nunnington Farm and have great difficulty in busy times to provide water to my customers and animals in our pet park due to an under developed water supply to this area which also applies to the disposable of waste water.</p>	Discuss with Steering Group

		The road access would be a particular hazard not only in busy times when there is a constant cue of traffic There is room for further development at North fields the rear of Summersfield which would not have such an intrusive impact on the village. I would think this would be a much better and obvious option. I therefore object to this application.	
	Sue Milnes	Support rent only not sale, support restricting second homes	
	Alice McMillan	Supports limit on second homes, and need to secure affordable housing	
<b>WW3b</b>	Keith Martin	<b>Strong objection.</b> This site is outside the settlement area and will destroy the rural view on approaching the village from Chichester. Unlike Malthouse Cottages, set back from the road and screened by trees, the narrow strip will place the new properties prominently on the street front. Development along streets is not best use of land. This site is on the boundary of the AONB and will create additional recreational disturbance.  <i>The VDS, Policy 12, recognised the importance of the screening of the settlement area to the north of the Rookwood Road recreational ground. A strip of housing just to the north of the recreational ground would completely change the visual character of the views from the north. Any of the other options are better than this site. A relatively small addition to the north of new houses in Church Road would be preferable and much closer to essential services.</i>	
<b>Proposed alternative / additional housing sites</b>	Graeme Barrett re Policy 3a	In the light of the Climate Change predictions sites such as Land at Church Road should be excluded as it lies between 4m and 5m AOD. Even though CDC have rejected the Bramber Nursery site this should still be considered as it is a brownfield site, public transport close by and it is above 7m AOD. The site is 1 Hectare and could support a medium density level of housing, 25 units. Could consider them as all market housing with a 15 Affordable development at Northfields.	EA maps do not identify a flooding issue at Church Road. Discuss proposed alternative site with Steering Group
	Graeme Barrett re Policy 3b	A more appropriate site would be an extension to the Northfields development.	No reasons given and this site is within the AONB.
	Mrs JA Jacobs	Objects to Rookwood site, as water supply there is poor and also because road access would be difficult during busy periods. - Northfields would be a better site.	
	Richard Dollamore	objects to Rookwood Rd site as ribbon dev is poor design and will impact on rural character of village which is nuclear. More socially sustainable to integrate social	

		housing with market housing. - Consider Church Rd site to deliver affordable housing and also consider field between Wellsfield and Elms Lane as such a site	
	Mirielle McGinn	Design must be carefully designed as visually the entrance to the village therefore impact	
	Smith Simmons and Partners	<p>We act on behalf Mr J Ferguson, freehold owner of land at Bramber Nursery and are pleased to have the opportunity to submit comments on your Pre Submission Regulation 14 Draft Neighbourhood Plan. In summary, our view is the Plan as it stands, does not meet the 'basic conditions' for Neighbourhood Plan preparation as it has failed to</p> <p>i) Have proper regard to national policies and advice in terms of housing site selection, and</p> <p>ii) Is not in general conformity with the strategic policies of the development plan for the area</p> <p>It has failed test i) above because, in selecting housing sites that are all greenfield based on an estimate of capacity, the opportunity to prioritise the redevelopment of previously developed land as encouraged by national policy in the NPPF has been lost.</p> <p>It has failed test ii) because the strategic policies of the development plan for the District are still in preparation and the housing distribution to the various parishes across the District have not been agreed. The Neighbourhood Plan has allocated housing sites based on a draft Local Plan allocation of 25 dwellings to the Parish which simply cannot be relied on. It therefore runs the risk that should the Local Plan distribution of 25 units be increased for West Wittering Parish as we believe it should, then the Neighbourhood Plan will not be in general conformity with the overarching Local Plan. At this stage, we are minded not to formally oppose the Plan as we believe its failure to meet the above tests can easily be remedied by including a new brownfield allocation for residential development at Bramber Nursery. We are therefore supporting the Plan but only on the basis that it is modified by including Bramber Nursery as an additional housing site.</p> <p>The inclusion of this site would benefit the Plan as it would:</p> <ul style="list-style-type: none"> <li>• Bring it more in line with national policy to use previously developed sites for housing wherever possible, and</li> </ul>	Discuss proposed alternative site with Steering Group

		<ul style="list-style-type: none"> <li>• Provide a further housing land reserve and help it meet any increase in housing proposed for the Parish in the Local Plan.</li> </ul> <p>Basic Conditions for Neighbourhood Plan Preparation</p> <p>Paragraph 8(2) of Schedule 4B of the 1990 Town and Country Planning Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:</p> <ul style="list-style-type: none"> <li>• Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made</li> <li>• Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area</li> <li>• Contribute to the achievement of sustainable development</li> <li>• Be in general conformity with the strategic policies of the development plan for the area</li> <li>• Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations</li> </ul> <p>Test 1 - Has the Plan Paid Regard to National Policy in the NPPF?</p> <p>We do not believe the Neighbourhood Plan has paid regard to National Policy in terms of housing site selection and has therefore failed the first basic condition above.</p> <p>We say this having reviewed the Strategic Environmental Assessment (SEA) forming part of the evidence base for the Neighbourhood Plan. The SEA extract accompanying these comments confirms at paragraph 4.12 that eight sites were brought forward as potential housing allocations as part of the Parish Council's 'Call for Sites' initiative. Our clients land at Bramber Nursery is listed in Table 4.1 as Site Ref 4 with a site area of 1 ha and an estimated capacity of 3 units. At 'Call for Sites' stage we explained that Bramber Nursery was a legitimate previously developed site as it benefited from a Certificate of Lawful Use for A1 retail sales of garden centre products. The A1 use distinguished the land from its former use as a horticultural nursery. We also pointed out the site's sustainability performance being located very close to bus stops on Chichester Road, a public house and a country club. Above all we pointed out the inclusion of the previously developed site in the Neighbourhood Plan would fall squarely in line with National Policy in the NPPF</p>	
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		<p>which encouraged the use of previously developed land for housing. However as confirmed in the third bullet point in paragraph 4.13 of the SEA the site was simply discounted because with an alleged capacity of 3 dwellings it was considered 'too small to meet the required threshold of six dwellings to facilitate affordable dwellings'.</p> <p>Policy in the NPPF</p> <p>Bramber Nursery was not considered having regard to national policy in the NPPF and shows that the site selection process was flawed. In our view however, the inclusion of Bramber Nursery in the Submission Neighbourhood Plan would bring it more in line with the NPPF. The policy in the NPPF which in our view supports the allocation of Bramber Nursery is:</p> <ul style="list-style-type: none"><li>• Paragraph 68a which recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Similarly, paragraph 69 states that Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area. Bramber is an example of this type of site being no more than 1ha.</li><li>• With regards to housing in rural areas, paragraph 79c of the NPPF states that planning policies and decisions should avoid the development of isolated homes in the countryside unless the development would re-use redundant or disused buildings and enhance its immediate setting. The redevelopment of Bramber would re-use redundant land and buildings in the rural area and enhance its setting.</li><li>• Section 11 of the NPPF is all about making a more effective use of land and paragraph 117 states strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land. Paragraph 118 states that planning authorities should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict,</li></ul>	
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		<p>contaminated or unstable land. The redevelopment of Bramber Nursery falls squarely in line with this guidance.</p> <p>The Capacity of Bramber Nursery</p> <p>Bramber Nursery was discounted as a potential housing site in the SEA because its alleged capacity of 3 dwellings would not deliver any affordable housing. However even this assumption is incorrect, and we attach a Site Layout Plan with these representations showing the site can provide at least 9 dwellings which would provide 3 affordable units. The layout has taken into account other draft Neighbourhood Plan policy requiring at least 30% bungalow provision.</p> <p>Test 2 - Has the Plan been prepared in general conformity with the strategic policies of the Development Plan?</p> <p>As drafted the Plan has failed this test too. It cannot be in conformity because the strategic policies of the development plan for the District are still in preparation and the housing distribution to the various parishes across the District have not been agreed. The Neighbourhood Plan has allocated housing sites based on a draft Local Plan allocation of 25 dwellings to the Parish which simply cannot be relied on. It therefore runs the risk that should the Local Plan distribution of 25 units be increased for West Wittering Parish as we believe it should, then the Neighbourhood Plan will not be in general conformity with the overarching Local Plan.</p> <p>We do not agree with the 25 dwelling allocation for West Wittering in principle and have made representations to the District to point out that the Parish allocations in the draft Local Plan have not been distributed amongst the settlements in accordance with their ranking in the settlement hierarchy. We pointed out for instance, that the 25 unit allocation to West Wittering Parish underrepresents its service village ranking in the Hierarchy background paper in terms of its population (being the 6th largest of all settlements) and in terms of its local facilities (16 facilities). We suggested that West Wittering should therefore take a greater share of housing than is currently proposed and in our view it would be prudent for the West Wittering Neighbourhood Plan to identify additional sites to cater for this eventuality as well.</p> <p>Mending the Plan with an Additional Housing Allocation</p>	
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	Dlp of behalf of West Wittering Developments Ltd	<p>(Summary due to length of submission, see original for details)</p> <p>Supporting Statement and Flood Risk and Drainage Feasibility Report to support the allocation of site at Eli’s Lodge. The site is considered suitable to sensitively deliver between 10-15 dwellings and is of sufficient size to make a significant contribution to the required housing provision for West Wittering, whilst ensuring limited impact on the character of the settlement and the special qualities of the AONB. The site is in single ownership with no significant development constraints and is therefore available for development and can considered deliverable within the next 5 years. A sensitive design approach is achievable and could be discussed with the neighbourhood plan steering group and taken through a detailed planning application.</p>	Discuss proposed alternative site with Steering Group
	Welbeck Strategic Land	<p>(Summary due to length of submission, see original for details)</p> <p>Letter from DMH Stallard and Vision Statement for land west of Church Road</p> <ul style="list-style-type: none"> <li>• The site is in a sustainable location, within walking distance of many services within the sustainable village of East Wittering.</li> <li>• The site can deliver circa 226 units of new housing.</li> <li>• The site is well enclosed from surrounding views and can be well integrated into its edge of settlement location.</li> <li>• Suitable access is simple to achieve, therefore there is no need for any major infrastructure upgrades in order to deliver the site.</li> <li>• The existing Hedgerow and trees pattern would be preserved and upgraded in certain locations.</li> <li>• A 10% net biodiversity gain will be achieved on the site</li> </ul>	Discuss proposed site with Steering Group

<b>Policies 3a,b,c and 5</b>	Jeremy Haynes	<p>Following periods of heavy rain the sewage facilities of West Wittering become over-whelmed. This results in untreated sewage flowing from the manhole at the junction of the B2179 and Pound Road outside the Landing Café and the manhole between numbers 2 &amp; 3 Springwell Cottages. The untreated sewage flows to the brook and on into Chichester Harbour. This occurred on 22/12/19, 16/2/20 &amp; 29/2/20.</p> <p>In order to protect the health of visitors and residents I would suggest that no additional housing is connected to the public sewage system unless and until the sewage system has been upgraded to meet the capacity required.</p>	Southern Water has a statutory duty to connect all new development to the sewage system and to make sure that system operates within environmental limits. Sewage capacity for the quantum of development is assessed at Local Plan level so that improvements can be planned in.
<b>Page 24: Policy WW3c Windfall Housing Development</b>	CDC	Concern about the inclusion of criterion a) as this is overly restrictive. In addition, there is concern about the requirement of 30% of site to comprise bungalows as this may not be practical in terms of the size of the site or the character and design of the surrounding area. Suggest revising the wording to encourage/welcome bungalows rather than insisting on it.	Discuss with CDC
<b>Page 25: Policy WW4 Principal Residence Requirement</b>	CDC	There needs to be clear justification for the inclusion of this policy. Suggest a background evidence paper is compiled to illustrate the difficulties faced by the parish in relation to second homes and this is kept updated as the NP moves forward.	Discuss with CDC
<b>WW4 4.13</b>	Keith Martin	No one thinks that West Wittering is “seemingly empty and deserted out of season”. <b><i>The huge number of houses built in the last few years in East Wittering and Bracklesham have created busy roads year round.</i></b>	
<b>4.14</b>		The NDP, lasting to 2035, should avoid the commercial name AirB&B. <b><i>Suggest that “short term let” is used as a replacement term.</i></b>	
<b>Page 26: Policy WW5 Visitor Accommod</b>	CDC	Support principle of policy but wording is rather vague and needs to be more precise and positive. For example, something along the lines of “Good quality visitor accommodation will be supported, particularly where this may be for longer staying visitors, where it reflects the character and nature of the village subject to other	Amend as suggested and discuss purpose of ‘party house’ insertion with Steering Group.

ation and Facilities		development plan policies. Some definition of what ‘longer term’ means would also be useful. It is not clear what the reference to ‘party houses’ is intended to refer to or how these could be controlled by planning measures.	
4.4 and 4.5	Mirielle McGinn	Change document layout	
WW5	Keith Martin	Objection. The village does not need more 6 bedroom houses for short-term let. They do nothing for the local housing needs and little for the economy. <b><i>The proviso sentence should be rewritten. There is, perhaps, a need for a hotel but applications for new dwellings to be, all or partly, let should be refused.</i></b>	
Page 27: Map 7 Map showing settlement boundary from adopted plan	CDC	It is not clear what the purpose of this plan is or why it is located in this part of the plan. The proposed updated/revised settlement boundary should be shown in the policies map in Appendix A.	Amend as suggested
	Mrs Jean Barrett	Map showing settlement boundaries from adopted local plan. Only shows Western part of West Wittering. The settlement boundaries for Eastern part of West Wittering is not represented.	Check as Policies map should cover whole parish
Page 27: Map 8 Map showing parade iof shops within the parish	CDC	It is also not clear if this is the only parade or if there may be others. Again boundaries would need to form part of the policies map in Appendix A.	Check and amend if necessary. Understood that there is only one parade in the parish
WW8 2 <sup>nd</sup> para	Keith Martin	New footpaths and cycleways are not identified in “Policies Map”. <b><i>The Contents refer to Policies Map as Appendix A. pages 42-44. I cannot see any “quiet lanes” identified in these maps. Coastguard Lane, Ellanore Lane, Elms Lane, Rookwood Lane, Sheepwash Lane, and Redlands Lane should be included.</i></b>	
Page 27: Policy WW6 Economic Development	CDC	The reference to “small businesses” should be reconsidered. A small and medium sized enterprise (SME) is up to 250 employees. It is unlikely the parish would be able to support this size business in terms of infrastructure. Suggest it would be more helpful to use the term “Business”. In addition, suggest that only if there is no other available space for businesses within the area, brownfield sites could be used. There	Discuss with CDC

		will need to be justification for development and viability will need to assessed, in order to prevent residential use by proxy.	
<b>Page 28: Policy WW7 Retail Facilities</b>	CDC	This policy needs to be more precise and to identify clearly where any parade is and its boundaries on the policies map. The loss of retail facilities will need to make cross reference to the marketing advice contained in the next iteration of the Local Plan Review.	Discuss with CDC
<b>Page 28 Para 4.20</b>	WSCC	As above; whether development should contribute to provision of these would be dependent on the scale and site specific constraints of development and contributions or links into new/existing cycle ways would be assessed if necessary on a case by case basis.	Noted
<b>Para 4.21</b>	Will Ellsworth Jones	WSCC should designate Quiet Lanes to enhance safe cycle routes	
<b>Para 4.21</b>	Mirielle McGinn	Welcomes proposal for cycle routes but not by losing green verge. Concerned about risk of flooding if suitable drainage not included.	
<b>WW8</b>	David Toms	Comment re cycle path suggests crossing over at Summerfield and onto Ellanore Lane	
<b>WW8, 9 Para 4.22</b>	Elizabeth Williams	Coastal access needs to be monitored. Existing paths exclude horses.	
<b>Page 29-30: Maps 9-12</b>	CDC	It is not clear what is the origin of these proposals or what they are related to. Are they being put forward by the parish as aspirations? This needs to be clarified.	Maps are related to Policy WW8 and need to be incorporated within the Policies Map.
<b>Page 31: Policy WW8 Public Rights of Way and Quiet Lanes</b>	CDC	The lanes and public rights of way do not appear clearly identified on the policies map in Appendix A as indicated in the text. Neither do the cycle ways and proposed routes. The last sentence of para 1 of the policy would be difficult to use as a reason for refusal.	See above.  The last sentence is “The proposed routes will be safeguarded from development that could prejudice their implementation”. Discuss alternative wording that would achieve this with CDC.

<b>Page 35:</b> <b>Policy</b> <b>WW10</b> <b>Biodiversity</b> , <b>Geodiversity</b> <b>y and</b> <b>Mitigating</b> <b>the Impacts</b> <b>of Climate</b> <b>Change</b>	CDC	<p>Would benefit from qualifying the statement “Development will be expected to retain and support the enhancement of these [undesigned biodiversity and geodiversity] assets” with the following “except where essential for the viability of the site (such as access) and then any harm should be minimised and mitigated.”</p> <p>This qualification is suggested on the basis that although there is support for the retention and enhancement of biodiversity and geodiversity assets on a site such as hedgerows and treelines, there are likely to be situations when it may be necessary to for example remove a small length of hedgerow to allow access into a site. Although any hedgerow removal may be minimised, the site will not be viable if there is no access.</p>	Amend as suggested
	Natural England	<p>Policy WW10 states that ‘Development proposals that achieve a net gain in biodiversity assets, enhance the natural capital of the area and increase its resilience to climate change will be supported subject to other relevant development plan policies’. Whilst Natural England welcomes the principle of this policy, we recommend amending it. As written, other development plan policies could take precedence over achieving net biodiversity gain.</p> <p>Natural England recommends that the policies in the Neighbourhood Plan are written so that all the policies need to be complied with, not that they are subject to one another. Where a degree of flexibility is appropriate, phrases such as ‘where possible’ or ‘where appropriate’ could be used. However, in the case of biodiversity net gain, this is a mandatory requirement in the Environment Bill.</p> <p>Therefore, we suggest amending Policy WW10 to read ‘Development proposals must achieve a net gain in biodiversity assets (demonstrated by reference to the Defra Biodiversity Metric). Development proposals must also demonstrate how they have enhanced the natural capital of the area and increased its resilience to climate change wherever possible.’</p>	Amend as suggested
<b>Page 36:</b> <b>Policy</b> <b>WW11</b> <b>Community</b> <b>Facilities</b> <b>and Open</b> <b>Spaces</b>	CDC	<p>It may be better to remove the list from the policy or just refer to examples rather than a comprehensive list as this will offer more flexibility and potentially protection.</p>	<p>A similar policy in the Henfield NP was criticised by the Examiner for not listing the facilities. Suggest leave for the Examiner of this NP to decide.</p>

	Elms Lane Tennis Club	<p>Neither paragraphs 4.24-4.28 nor Policy WW11 (including the Policies Map-Community Facilities) mentions an important community facility, namely the Elms Lane Tennis Club.</p> <p>The Elms Lane Tennis Club was founded in 1994 by the late Barry Russell and is, according to its Constitution, a non-profit making members club formed to provide a tennis court in West Wittering for its members and to encourage and facilitate the playing of tennis for all ages. It currently has some 90 adult members and 35 junior members, all of whom are resident in West Wittering or the immediate surrounding area. It consists of a single tennis court and club hut situated in the former farmyard of Home Farm in Elms Lane.</p> <p>The Elms Lane Tennis Club is affiliated to and registered with the Lawn Tennis Association and is an important community facility.</p> <p>Suggest the insertion of the Elms Lane Tennis Club into the list of important community facilities in Policy WW11 and into the Policies Map of Community Facilities in Appendix A.</p>	Amend as suggested
WW11	Keith Martin	<p>Item 3. Football Pavilion doesn't make clear that this is also a recreational ground. No mention of third pub. <b>Add Recreational Ground including tennis courts and play areas. Add The Shore Inn, probably used by local residents more than any other public house.</b></p>	
WW12 Lighting	Natural England	<p>This policy includes the sentence 'Proposals that are within or affect Chichester Harbour AONB must also demonstrate that there will be no significant adverse effects on the wildlife.' Natural England recommend including a separate policy on the AONB rather than burying it in a policy on lighting. CHC will be able to advise in more detail, but a policy could refer to safeguarding the special qualities of the AONB, and having regard to the AONB management plan.</p>	Discuss with Chichester Conservancy
Aspirations	Keith Martin	<p><b>Add Aspiration 10 – To promote WW for business and leisure - high speed fibre optic broadband to all properties.</b></p>	
Community Aspiration 6	Graeme Barrett	<p>Replace Peninsular with Peninsula</p>	Amend as suggested
Page 38 Community	WSCC	<p>It is not clear which 'Flood and Drainage Study' this paragraph is referring to; is this a Parish document? If so it does not seem to appear the Background Information documents on the website.</p>	Check reference



<b>Aspiration 7</b>			
	Thomas Richardson	Support with modifications - Need to provide details of how to control traffic to and from Car Park	
	L Richardson	Support - Need to address traffic	
<b>Delivery Plan</b>	Graeme Barrett	There should be conditions placed on the schedule of delivery: a) A27 mitigation programme must be complete b) At present following the completion of currently approved developments the capacity of the Sidlesham Water Treatment Works will have been exceeded. c) The sewage network requires upgrading to meet the current needs and future needs (noting Attenuation Tank issue at Northfields) d) Impact of Climate Change on Sea Level rise, forecast to be 2m rise by 2100, land below 7m AOD should not be used for residential development e) West Wittering Parochial School capacity increased to meet projected increase in the 5 to 11 year old population.	Consider inclusion within an Infrastructure List.  Check suggested 7m AOD restriction with CDC
<b>Delivery 6.2</b>	Keith Martin	To represent the DNP as “encouraging” development is surely not representative of the views of the village. <b><i>The DNP is focussed on meeting its local housing needs and adhering to the minimum numbers determined by the Local Plan. It indicates preferred sites for such development. In addition, it proposes a footpath and cycleway enhancement.</i></b>	
<b>Page 42: Appendix A Policies Map</b>	CDC	This needs to be more comprehensive as indicated in some of the comments above. Also there does not appear to be any reference to local green spaces in the NP as defined in the NPPF paras 99-100 . Is this an omission or are there none the parish consider meet the criteria for allocation?	Agreed that Policies Map needs work. NPs do not need to include LGS, all potential green spaces were considered to be adequately protected by existing ownership and policies.
<b>Appendix C: West Wittering Village Design</b>	CDC	See comments at beginning of this response.	Discuss with CDC
	Historic England	The 2006 village designed statement has been updated and this is welcome.	Noted
	Tony & Jan Gillon	Our representation relates to the Village Design Statement (VDS) - which is referred to in the West Wittering Neighbourhood Plan at Policy No 4.3 onwards.	Check with authors of VDS.

<p><b>Statement (VDS)</b></p>		<p>Planning Guideline 34 of VDS contains a range of policy statements in respect of Wells Farm Estate, including that “any new development should maintain spaces between buildings, the large plot size ...” and “... maintain the existing mature hedges and 3-4 metres of grass verge to the road”.</p> <p>We support these policies with respect to the whole of Wells Farm Estate and presume that it was the intention of the draft VDS that they should so apply. However, although the policy at VDS 34 is headed “Wells Farm Estate”, it is actually within the section of the VDS that specifically addresses the area of West Wittering defined as “Area 2 – South West”.</p> <p>The plan on pages 2 &amp; 3 of VDS excludes Royce Close, Elms Ride and the northern end of Royce Way from Area 2; it includes these streets within “Area 5 – Northern” instead.</p> <p>Within the section of the VDS dealing with Area 5 are very similar policies, but each refers to a specific street – for example Planning Guideline 51, which relates specifically to Locksash Close.</p> <p>Similar statements are made regarding other streets in Northern, but with the notable exception of Royce Close, Royce Way and Elms Ride. (There are no references at all within the VDS to Royce Close or Royce Way, and only one general reference to Elms Ride.)</p> <p>The spacing and character of the properties in Royce Close, Royce Way north and Elms Ride are similar to other streets, whether in Area 2 - South West or Area 5 - Northern, yet they do not benefit from similar explicit policies.</p> <p>We are concerned that the absence of either similar street-specific policies, or of a general policy relating to Area 5, might be construed as excluding Royce Close, Elms Rode and Royce Way northern from such policies, which I suspect is not the intention of the VDS.</p>	