

West Wittering Neighbourhood Plan – 2017 -2029

Consultation Statement



February 2022

**Published by West Wittering Parish Council (Qualifying Body)
To fulfil the Neighbourhood Planning Regulations 2012 (Part 5 s15)**

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1. Introduction & Background

This Consultation Statement has been prepared with the aim of fulfilling the legal obligations of the Neighbourhood Planning Regulations 2012, in respect of the West Wittering Neighbourhood Plan (WWNP). The legal basis of this Consultation Statement is provided by Section **15(2)** of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the main issues and concerns raised by the persons consulted; and
- describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

The Parish Council and WWNP Steering Group have undertaken a series of consultation activities with residents, statutory bodies and interested parties to enable an extensive engagement and involvement in the preparation of the WWNP.

West Wittering Parish Council (the qualifying body) has received consultancy support from Action in rural Sussex and PlanforLocalism during the preparation of the WWNP. This consultation statement sets out details of all the events and activities carried out in the parish and with key bodies identified as stakeholders. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.

A successful neighbourhood plan is dependent on the involvement of sufficient, representative, community-minded individuals, associations and groups to drive the project forward to completion. Appropriate community engagement is therefore key to the success of the West Wittering Neighbourhood Plan (WWNP).

The three main stages up to submission comprised the following:

- Scoping Report & Evidence Reports– these report summarised the scope of the WWNP and key factual data about the parish of West Wittering. They are supported by Steering and Working Group Documents.
- Pre-Submission Plans (this comprised the draft vision, objectives, policies and which was submitted twice for the statutory six week consultation period.
- Submission Plan – this took into account the representations received on the two Pre- submission plans consultation and where the appropriate amendments have been made.

2. Community Involvement

Summary of 2016 -2021 Consultation Activities (West Wittering NP)

As part of the plan making process, the Parish Council, Steering Group and Focus Groups have undertaken a number of public events as part of their consultation activities. These consultation activities were advertised to the residents through flyers, websites, notice boards and local newsletters.

Launch - Annual Parish Assembly – May 2016

WEST WITTERING – THE FUTURE OF YOUR VILLAGE
HAVE YOUR SAY!

Welcome to the West Wittering Annual Parish Assembly and launch of the process to develop our **Neighbourhood Development Plan**.

Shortly, Rowena Tyler from 'Action in Rural Sussex' – the consultant who will be helping us to develop our Neighbourhood Development Plan – will explain the benefits of a Neighbourhood Development Plan and ask for your help to identify what makes West Wittering special, as well as any changes which you think would make it a better place to live.

To get you thinking about this, please try to answer at least one of the questions in each of the four boxes on the other side of this page.

THANK YOU!

West Wittering Neighbourhood Plan; Email: westwitteringnp@gmail.com www.westwitteringparishcouncil.gov.uk

What is special about West Wittering? Why do you like living here? What positive things do others say about the village?	What are the difficulties facing West Wittering? For residents For visitors For businesses
How could West Wittering be improved, and what would be the benefit? What would help the village to keep vibrant, but retain its distinct character?	What could have an adverse impact on the West Wittering? From within the village From elsewhere

West Wittering Neighbourhood Plan; Email: westwitteringnp@gmail.com www.westwitteringparishcouncil.gov.uk

Residents attending the West Wittering Parish Assembly in May 2016 were asked to complete a questionnaire covering the village's strengths, weaknesses, opportunities and challenges. Some effort was also made to encourage response from others. A total of 24 forms were completed and analysed. In considering the findings it was noted that: the absolute number of individuals who have provided feedback is limited and only embraces people who were motivated to attend the Parish Assembly.

Visioning Workshop – June 2016

A neighbourhood plan visioning workshop was held in June 2016 following the initial community consultations to identify the key issues in West Wittering and to establish the scope and possible content of the West Wittering Neighbourhood Plan through defining a draft vision and objectives. The draft vision and objectives is to provide a

clear spatial expression to the Plan, showing how and where West Wittering may grow and the impact on infrastructure, especially the roads, traffic, facilities, the local economy and housing.

Engaging with Stakeholders

West Wittering Neighbourhood Plan
Invitation to become a Stakeholder
Neighbourhood Planning (General) Regulations 2012
Town and Country Planning Act 1990 (Section 61G as amended)

The West Wittering Parish Council is preparing a Neighbourhood Plan for the parish. The Neighbourhood Area has been approved by Chichester District Council in accordance with the above legislation. The Plan will set out detailed planning policies to guide how the Parish will change during the period up to 2029. It will be a statutory document and so will comply with the framework provided by government policy and by the Chichester Local Plan. A Steering Group made up of Parish Councillors and other representatives of the local community is already managing the process with the help of consultants.

There will be topic-related Focus Groups reporting to the Steering Group. A questionnaire will be distributed to every household in the Parish and a series of exhibitions and workshops are being organised to obtain information from local residents and fully involve them in the plan-making process. A series of draft proposals will be drawn up early next year with a Parish Council-approved Plan being submitted to the local planning authority later in 2016/17. An independent examination and local Referendum will follow. New housing development is certain, but the Parish Council intends to specify numbers, what sort it is, where it goes and its general appearance. Additional land may be needed for new business development. The plan is likely to support negotiations with developers to get funding for better local community and service facilities. There are particular concerns about the ability of local infrastructure to accommodate all this.

Your assistance in helping us assemble an evidence base would be welcomed. We would like your organisation to be actively involved in the whole process to ensure that what we eventually propose is realistic.

This Plan is going to be very important in shaping the future of our Parish. We would like you to be involved by sending a representative to one of our workshops. **In the meantime, please will you advise if you wish to change the contact name/e mail address we have used for this letter?** Further information will be available on the Parish website showing what we have done so far and if you are willing to take part please contact the Clerk to the Parish Council. We need the fullest possible involvement from all concerned in what comes next and hope that you will be able to contribute.

Yours faithfully

Joanne KM Brown, ACIS
Clerk West Wittering Parish Council

Call for Sites

West Wittering Neighbourhood Plan

CALL FOR DEVELOPMENT SITES

West Wittering Parish Council is preparing a Neighbourhood Plan for the West Wittering area under the provisions of the Localism Act 2011.

The Steering Group aim to assess future housing and other development needs and is calling for Landowners agents/managers, developers, businesses and local interest groups within the West Wittering area to submit expressions of interest for potential development sites to be considered for possible inclusion in the Neighbourhood Plan for future development.

At this stage the Steering Group is not committed to allocate a proposed site to the Neighbourhood Plan. This exercise will not in itself decide whether a site would be allocated for development by the neighbourhood plan nor will it commit the proposer(s) to applying for planning consent, but it will enable the steering group to better understand the needs and wishes of the electors within its Parish area.

The site suggestions received by us will be used to guide and inform the preparation of the Allocations of Land and Site Development section of the Neighbourhood Plan.

If you want a site/s to be considered for development by the Neighbourhood Plan, we should like to hear from you. The sites need not be in your ownership if you have a responsibility for managing them and they can be proposals for a wide range of development uses.

Please supply the following information

- Location shown (supply map where possible showing site boundary)
- Current use of site
- Any known and anticipated constraints to developing site
- Proposed type and tenure of development (market, affordable, starter homes, downsizers, family homes, retail, office, etc.)
- The scale of proposed development (numbers)

If you would like a site to be considered, please send all relevant information including your name and full contact details no later than **31st May 2017** to [insert email](#) Please head your submission "**West wittering NDP Call for Sites**"

Alternatively you can submit by post to **insert address**

Thank you

Heritage & Assets Workshop

A heritage and assets workshop was held in November 2017 with refreshments to gather residents views and opinions on what matters most to them in terms of assets for the Parish.



West Wittering Neighbourhood Plan

HERITAGE AND ASSETS CONSULTATION

Date: THURSDAY 23rd NOVEMBER 2017

Time: 7PM (Refreshments will be provided)

Venue: PAVILION, ROOKWOOD ROAD, WEST WITTERING

What are our Parish Assets? What Heritage needs preserving? What do you think are the Villages best views and treasures? What is unique about West Wittering?

Your views are critical in identifying these important features of the village

Bring your Photos/Ideas/Views!

Please come along to this fun and informative evening and help make sure these village assets are recognised and protected in the Neighbourhood Plan. This will support the Neighbourhood Plan Team to include all the assets, treasures and features of West Wittering.

YOUR CONTRIBUTION WILL HELP

**PLEASE INDICATE YOUR ATTENDANCE BY CONTACTING THE CLERK ON 01243 582667 OR BY
EMAIL at wwpc@talktalk.net**

 West Wittering Neighbourhood Plan; Email: westwitteringnp@gmail.com; www.westwitteringparishcouncil.gov.uk;



Engaging with Chichester District Council (CDC)

In the early stages of the West Wittering NP process, a meeting was held by the Steering Group and our consultants from AirS with the planning officers at Chichester District Council (CDC) to discuss the scope of the WWNP, the project plan and to seek clarification from CDC regarding key timescales in relation to their own Local Plan, contacts, support available and information or key documents the Steering group needs to be aware of.

Following this meeting, there has been informal telephone and email correspondence with CDC as well as further meetings at key stages of the WWNP. The Parish Council and Steering Group developed a healthy relationship with the planning officers at CDC who have been helpful and supportive throughout the process.

Ongoing engagement with residents

Central to the development of the WWNP was to ensure the local community was informed and had opportunities to contribute to the process. This was achieved primarily through regular updates on the Parish Council website, notice boards and newsletters, posters and flyers also by word of mouth.

WEST WITTERING CHURCH

MEETINGS SUSPENDED
DATE
23-Mar-2020
TIME
10am
LOCATION
The Pavilion, Rookwood Road,
West Wittering PO20 8LT
INFO
The Parish Council has suspended further public meetings in line with Government advice. The business of the Council will be conducted under a Temporary Scheme of Delegation passed by resolution at an Extraordinary Meeting on 23rd March 2020.

NEWS
Corona virus
See here for a compilation of official and local advice on living with Covid-19. ([http:// ...](#))

QUICK LINKS
Grants
Your Councillors
Policy & Reference Document
Local Directory

NEIGHBOURHOOD PLAN
REGULATION 14 CONSULTATION FEBRUARY 2020
Regulation 14 FEB 2020 - Pre Submission Plan
Regulation 14 FEB 2020 - SEA Environmental Report
Regulation 14 FEB 2020 - VDS
Regulation 14 FEB 2020 - Consultation Form
Regulation 14 FEB 2020 - Consultation Flyer

THE VISION AND OBJECTIVES
Vision Statement October 2017
Vision Statement July 2017
Vision Statement October 2016
NDP Draft Objectives

THE PLAN
SG Task Plan Feb 2018

PROJECT PLAN AND COMMUNICATIONS
Project Plan Feb 2018
Amended Project Plan March 2017
Land Use and Development Tasks

Engaging with Local Businesses – 2017-2019

In 2017 A SWOT analysis workshop with local businesses was held to inform and shape the future of local businesses. Attending businesses were asked about the main strengths and advantages of West Wittering for local businesses as well as what the disadvantages and hold backs were. This was flowed up in Nov 2019 with further engagement with local businesses operating from and within West Wittering Parish as well as those working from home. This was to help the Neighbourhood Plan Steering Group and consultants draw up policies about promoting, retaining and supporting local business in the parish. The drop in session included a simple survey and a SWOT assessment.

RUNNING A BUSINESS IN WEST WITTERING?

Whatever your business, the 15 year Neighbourhood Plan needs your input.

To do the best for local businesses, we need to hear your views.

Open Drop-In

Thursday November 16th 4.30pm – 6.00pm

**The Sports Pavilion, Rookwood Road,
West Wittering (parking at rear).**

Final opportunity for businesses to influence development
and land use to support **your business** and livelihood.



West Wittering Neighbourhood Plan Steering Group working with the Parish Council.

Engaging with Residents Association

The Parish Council undertook a survey of Residents Associations and private estate companies to provide evidence for its policy on party houses and Airbnb's in West Wittering

Dear Chair,

Draft Policy for West Wittering Neighbourhoods Plan – Short term let – Air BnB

As you know the Steering Group of the WWPC NP is collecting evidence regarding the use of private dwellings in residential areas for large scale short term lets (party houses/AirBNB). The number of such properties in the Village is increasing each season and unfortunately, in some cases, these lets are permitting activities that are having an adverse impact on the immediate neighbours and on the amenity of the wider area. We understand that some houses are now being purchased to be used exclusively for AirBnB/short term letting.

You have already provided information regarding these detrimental impacts and the steps you are considering regarding the use of restrictive covenants. The NP Steering Group is aware of case law where the Courts have confirmed that use of dwellings for short term let is a business use, which as well as being in breach of private covenants may also require a change of use for planning purposes, which is a public issue.

We are aware that complaints have been made in the past to Chichester District Council about the nuisance and the change in the character of the use of these properties, however, the Steering Group is not aware of the extent of the complaints and the resulting enforcement action.

The NP system exists to address planning issues which are specifically of local concern. This matter has generated considerable concern from local residents and the Steering Group will do what it can to put in place a suitable planning policy to address the issue. For this to be successful it requires as much evidence as possible from the residents as well as some local case studies which show how this change of use is affecting real people in their homes who should be entitled to quiet enjoyment.

We realize that some residents have been unkeen to complain about upsetting behaviour from short-term let guests and that there have been instances of late night gatherings in gardens and swimming pools as well as issues with parking. This is particularly the case where large numbers of guests are permitted. Without evidence collected by residents relating to this problem it is highly unlikely that the Inspector who will examine the NP before it is finally made will allow such a policy to stand.

We would also be pleased to hear from you as to whether you feel that a policy which addresses the detrimental impacts of extensive short term letting would help your Residents Association in controlling this problem on your estates. Any assistance by way of comments from you as to the effects of short term letting on your area would also be helpful.

Please could you let the Steering Group know your views and whether you and your residents support the Steering Group in promoting a draft policy regarding the issues of short term letting.

Your response by 16th April would be appreciated

Many thanks

WWPC NP Steering Group

In summary the Estate companies canvassed their residents. There was overwhelming support to promote the policy in the draft NP See Appendix 1 for responses

SURVEYS

NDP Survey Overview – November 2016

A parish-wide survey was carried out 2016 asking residents to have a say about the future of West Wittering. Every household received a questionnaire and was asked to complete and return by 30th Nov to three collection points. (West Wittering Medical Centre, Munneries and Saya's Newsagents) with the opportunity to obtain further copies from the collection points as well as an option to download from the Parish website.

A neighbourhood plan survey help set out what local residents consider important to preserve in West Wittering and to guide and provide guidelines on the types of development residents would support. Of those who responded to the survey, 66% are retired, 16% work full time, 12% are employed part time 4% are indicated being a carer or home maker. The majority of respondents to the survey were aged 71+ (47%), followed by those in the age bracket 61-70 (27%) followed by the 51-60 age bracket (15%), 41-50 (8%), 31-40 (2%) 18-30 (1%) and under 18 (1%)

NDP Survey 2021

Following the first Regulation 14 consultation on the West Wittering Neighbourhood Plan which included the proposed allocation of a site at Church Road for 25 homes to meet the target in the emerging Chichester Local Plan. Since that time Welbeck Homes brought forward a proposal for a much larger development on land which included the proposed allocation site. It was considered that the identification of land for such a large development was a strategic matter that should be assessed through the emerging Chichester Local Plan in the context of discussions about overall housing numbers required and other options for such proposals in the district.

The Steering Group therefore considered including a criteria-based policy that would apply to all housing proposals outside of current settlement boundaries that come forward ahead of the adoption of the Chichester Local Plan. In addition Chichester District Council advised that a proposal for affordable housing at Rookwood Road could come forward under the existing Local Plan policies as a 'rural exception site' and therefore does not need to be allocated in the Neighbourhood Plan.

Further evidence to support some of the policies in the Draft Plan that went out to consultation were also required. Further evidence was required to demonstrate the need for a policy on second homes, protecting the gap between east and west of the village as well as evidence to justify the types of homes residents will be needing now and in the near future.

Acting on these new developments, the Steering Group and Parish Council undertook another household survey across the whole parish from December 2020 through to the end of January 2021 asking residents for their views and to assist with the compilation of policies regarding housing requirements in the village and the green space between the east and west of the village.

A total of 1400 paper survey forms were distributed by hand to each household in West Wittering Parish. A total of 510 responses were received to the survey representing approximately **36%**. A full report of this survey is available on the parish council website with some summaries provided below.

1. *In relation to what type of tenure respondents who wish to move could afford, the majority (175) **67% could afford open market purchase**; (29) 11% social rent (50% of market rent); (25) 10% affordable rent (80% of market rent); (21) 8% shared ownership and (19) 7% each can afford discounted sales purchase and market rent.*

2. *In answer to the question 'what is your/their reason for considering a move', Of the 185 responses received, (53) **29% want to live independently**; (43) 25% want a smaller property because current home is too big; (28) 15% need to be close to family to give/receive support; (20) 11% said it is too expensive and they want a cheaper home; (18) 9% indicates someone in their household has a health or mobility problem; (17) 8% want a bigger home as current home is too small with (4) 1% each wanting an adapted home and to change tenure*

3. *The majority of respondents (107) **39% indicated a house would meet their needs** followed closely with a bungalow (90) 33%. Flat/maisonette/apartment would meet the needs of (47) 17% of respondents considering a move; (17) 6% retirement accommodation; (8) 3% sheltered accommodation.*

4. *Regarding impact on second homes;
Over half of those responding to impact of second homes (226) **58% indicated some street/roads feeling less occupied due to owners not being around for longer periods**; followed closely by unoccupied homes detrimentally affecting the character of the community (211) 54%
Resentment within the community / tension between permanent residents and second homers (160) 41%
Difficulty getting on the property ladder due to second homes demand pushing prices up (117) 30%
Family members forced out of parish to look for cheaper properties (115) 29%
Key workers moving away due to lack of affordable homes (94) 24%
Permanent Loss or closure of local services (75) 19%
Small local business owners moving away to look for cheaper properties hence affecting local economy (69) 18%
Temporary closure of facilities out of season (65) 17%*

5. *A greater proportion of respondents (420) **87% indicated that it is very important to retain the green gap between the two settlements of West Wittering**. Just a handful of respondents (13) just under 3% indicate that it is not important with the rest of the respondents (52) just under 11% indicating it is important.*

6. *A greater proportion of respondents (381) **85% think the green gap area is under threat** while (66) 15% of respondents do not think the area is under threat.*

First Regulation 14 Consultation

WEST WITTERING NEIGHBOURHOOD PLAN

2019—2029

Public Consultation

Pre-submission (Draft) Neighbourhood Plan and updated Village Design Statement 2019



Regulation 14 Consultation

24th February 2020 - 6th April 2020

DROP-IN EVENTS

Monday 24th February 2020 from 2pm til 4pm at the Pavilion Rookwood Rd
Tuesday March 3rd 2020 from 10am til 12 noon at the Pavilion Rookwood
Saturday 7th March 2020 from 10am til 12 noon at the Medical Centre Cakeham Rd

Residents are invited to come along to these drop-in event to learn more about the proposed policies and ask any questions relating to them.

Hard copies can be viewed at the following places;

Parish Office, The Pavilion, Rookwood Rd by arrangement
Medical Centre Cakeham Rd East Wittering
The Landing Café Pound Road
Witterings Library Oakfield Avenue

It will also be available on the Parish Council's website at
www.westwitteringparishcouncil.gov.uk, where you can also respond online





Residents attending controlled drop in session to read plan and submit representations at the Medical Centre and Pavilion

Extension of First Regulation 14 Consultation

stwittingerparishcouncil.gov.uk/news/west-wittering-parish-council-will-begin-consulting-on-its-draft-neighbourhood-plan-from-monday-24th



NEWS

Neighbourhood Plan consultation now closes Monday 27th April 2020

Monday, March 23, 2020

West Wittering Draft Neighbourhood Plan Reg 14 consultation has been extended.

As the public are now no longer able to view hard copies of the draft Plan and associated documents because of Covid 19 restrictions the consultation period has been extended to 5pm 27th April 2020.

Please use the form on the website if you would like to comment and return these by post to the Clerk."

During the consultation period, comments and representations are invited on the Draft West Wittering Neighbourhood Plan. Supporting Background Papers for information purposes have been provided. See [Plan, SEA & VDS](#).

Three drop in sessions were held at the Pavilion, Rookwood Road on Monday February 24th 2-4pm and Tuesday March 3rd 10am-12pm and the Witterings Medical Centre on Saturday March 7th 10am-12pm, to enable residents and interested parties to view the Plan and ask questions. The

Residents are encouraged to respond to the draft Plan by completing the attached form and returning it to the Parish Council at the Parish Office in the Pavilion Rookwood Rd. [Click Here](#)

RECENT POSTS

Corona virus

Repeat Prescription Arrangements

Neighbourhood Plan consultation now closes Monday 27th April 2020

No Public Rights of Way maintenance

BEACH CLOSED

Mobile Waste Recycling Suspended

Co-option to the parish council

Latest Newsletter

Report on East Head - Feb.2020

West Wittering Neighbourhood Plan 2017-2029 - Regulation 14 Consultation Coming Soon!

First Regulation 14 Consultation Representations

(April – May 2020)

First Regulation 14 Representations

The Pre-submission WWNP and associated documentation was published for its first Regulation 14 consultation from 24th Feb 2020 for a period of 7 weeks. It was also made available on the West Wittering Parish Council website with hard copies available for inspection in different location across the parish (see below). There was a word version of a response form that could be filled in online and emailed as an attachment. There was also the option to submit representations directly online via survey monkey on the Parish Council's website.

Availability of documents. Hard copies were available at the following locations:

- Parish Office, The Pavillon, Rookwood Road
- Medical Centre, Cakeham Road
- The Landing Café, Pound Road
- Witterings Library, Oakfield Avenue

Public consultation events

Drop in events on the pre-submission WWNP were held at the following places and dates

Monday 24th Feb 2020 – 2-4pm at the Pavilion

Tuesday 3rd March 2020 – 10am – 12noon at the Pavilion

Saturday 7th March 2020 – 10am – 12noon at the Medical Centre.

Residents were encouraged (through publicity before consultation start date) to attend any of the above sessions to learn more about the WWNP as well as seek clarifications on the proposed policies etc.

The following statutory bodies were consulted.

- **West Sussex County Council**
- **Chichester District Council**
- **Natural England**
- **Historic England**
- **Environment Agency**
- **Chichester Conservancy**
- **Highways England**

All six statutory consultees made Representations:

Other Representations received from

- Portsmouth Water Catchment Management
- Smith Simmons and Partners
- Dlp of behalf of West Wittering Developments Ltd
- Welbeck Strategic Land

West Wittering First Regulation 14 NDP Schedule of Representations and Changes Made

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>

			20190509 Revision date: 09 05 2019. Impact of Coronavirus lockdown on consultation to be assessed once comments are in and have been analysed.
	Natural England	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.	Check with NE whether this is a matter for the HRA or whether they are recommending additional criteria for the allocation policies.
	Environment Agency	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.	Noted.
	WSCC	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 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	

		<p>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: 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</p>	
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	Resident	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>	
	Chichester Harbour Conservancy	An initial observation is that the numbering should be simplified by calling 3a just 3, 3b just 4 and 3c just 5, with all other numbering from existing 4 renumbered to take account of this. Also, the first bullet points of each policy (where applicable) could usefully be spaced down from opening wording, to improve ease of reading each.	Noted
Page 3	Resident	Describing Neighbourhood Plans as a “new type of document” seems dated for 9 year old legislation. <i>Suggest that NPs are a form of planning policy that enables local people ... Grammar: change contain to containing.</i>	
1.1			
1.2		It was not a CDC initiative to designate the area for West Wittering’s NDP. <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>	
1.9		The verb “made” is used as an adjective. <i>Suggest an “adopted” Neighbourhood Plan.</i>	
Title of document and plan period	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.
West Wittering Village	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 further. It is therefore suggested the VDS is removed from the NP document itself.	Discuss with CDC

Design Statement (VDS) (currently included as Appendix C):		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.	
Page 2: Foreword	CDC	Second para, line 5 – the NP area was designated in 2013 not 2017, as stated in para 1.2.	Amend as suggested.
Page 4: National and Local Planning Context	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.
Page 5: Strategic Environmental Assessment (SEA)	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
Page 8: Para 1.19	CDC	The reference to 50% would read better as ‘50% of those who voted’.	Amend as suggested.
Page 9: Section 2 Parish of West Wittering	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 axe head 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 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.	Amend as suggested.

	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
2. The Parish 2.2	Resident	The tale that the boulders in Snowhill Creek were used as ballast in Roman Galleys is highly improbable to some experts. <i>Geologist describe the boulders as glacial erratic's left after the last ice age receded 10,000 years ago.</i>	Amend as suggested
2.16		The reference to "holiday parks" omits any numbers. <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>	Amend as suggested
2.17		Seasonal workers do not justify more housing. <i>There are hundreds of caravans for holiday let.</i>	Delete reference to housing being needed for seasonal workers
2.19		The high cost of housing and lack of affordable housing are not the prime reasons for the relatively elderly age of the population. <i>The prime reason is lack of jobs. Young people need housing close to employment and close to schools.</i>	Lack of employment is already mentioned.
Page 11. Para 2.11	Resident	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	Check amended wording to incorporate CME
Page 13: Parish Statistics	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?	Not classed as permanent dwellings.
Page 15: Vision and Objectives	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". 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	Amend objective 2 as suggested. Instead of amending 10-13 amend objective 3 so well-designed applies to all development not just housing.

		reveal the significance of the assets. 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'.	
The Vision 3.1	Resident	<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>	'rural' added to vision
3.2		Objective Facilities could be expanded. <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>	Amend as suggested
Page 17: Design	CDC	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.	Discuss with CDC
4.4	Resident	The Village Design Statement is briefly described as an attachment but lacks comment on its status. Where does the VDS stand? <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>	Explanation added at para 4.3
WW1		"Having regard to the Chichester Harbour Management Plan where relevant" is too weak. <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>	This goes beyond what can be justified. The Management Plan is a material consideration but it is not part of the Development Plan.
4.5		Retention of the gap between the two settlement areas is more than "protecting their respective identities". <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>	Amend as suggested
	Chichester Harbour Conservancy	WW1 – Design: - This usefully reinforces existing/emerging local plan policies by relating it to the character areas of distinctiveness referenced in the VDS. It is considered that the Joint CHAONB SPD and CHC's own Planning Principles in its Management Plan could also be usefully referenced, where new development is proposed within the AONB.	Agreed
Page 19: Policy WW2 Preventing Coalescence	CDC	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 justification for the inclusion of this area as green gap, CDC would not currently	Discuss with CDC and gather more evidence from survey

		support this policy.	
WW2	Resident	This policy is unacceptably weak. <i>Development within the Green Gap should only be permitted where there is an overriding public interest.</i>	This goes beyond what can be justified. This is not AONB.
4.6		If the Local Plan target is 50, met by extant planning permits, why is there a proposal for 25 new dwellings? <i>My understanding is that the established housing needs of the village are met by the new houses already approved.</i>	Allocation to be removed.
	Chichester Harbour Conservancy	WW2 – Preventing coalescence: this is a laudable aim, but it remains to be seen how an Examiner will assess the need for such a policy, given CDC’s existing policies relating to development in the countryside, for which an essential need must be shown.	Noted.
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</p>	Allocation to be removed

		reference to the landscape buffer here.	
	WSSC	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.	Allocation to be removed
	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 Plan¹, 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 the neighbourhood planning process. We recommend that the steering group have</p>	<p>Allocation to be removed</p> <p>Archaeological criteria retained in criteria-based policy and expanded to include other heritage assets.</p>

		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.	
	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>	Allocation deleted. Net gain addressed in policy WW10
	Resident	Local homes should include bungalows and no more second homes.	Noted
	Resident	Better standard of homes than Sandpiper Walk required Building Control not adequate.	Noted
	Resident	More affordable homes to be built	Noted
	Resident	Supports provision of bungalows	Noted

4.9	Resident	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,	Allocation deleted
Ww2 – para 4.9	Resident	Should be 50% affordable housing	30% complies with the Local Plan requirement
	Chichester Harbour Conservancy	WW3a – Allocation of land at Church Road for 25 homes: - The existing local plan allocation of 25 new dwellings is being met by extant planning permissions. The emerging local plan allocates a further 25 to the year 2035. A site has been identified outside the AONB at Church Road. Subject to issues of recreational disturbance being mitigated through local plan policy 50 (emerging policy DM30), CHC should have no objection as no harm to the landscape setting of the AONB is predicted. Support for this Church Road site being selected instead of the Northfields site in the AONB.	Allocation deleted
Page 22: Paras 4.10 and 4.11	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.
Para 4.10	Resident	Change 2108 to 2018	Amend as suggested
Page 22: Para 4.11 onwards	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.
Page 23: Policy WW3b Allocation of Land at Rookwood Road for 15 Affordable Homes	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.	Allocation deleted
	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	Allocation deleted

		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>	Allocation deleted
	Resident	<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>	Allocation deleted

		<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>	
	Resident	<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>	Allocation deleted
	Nunnington Farm	<p>With regard to the proposed planning re policy WW3b Land at Rookwood road for fifteen affordable housing. It 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> <p>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 Summerfield Rd which would not have such an intrusive impact on the</p>	Allocation deleted

		village. I would think this would be a much better and obvious option. I therefore object to this application.	
	Resident	Support rent only not sale, support restricting second homes	Noted
	Resident	Supports limit on second homes, and need to secure affordable housing	Noted
WW3b	Resident	<p>Strong objection. 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.</p> <p><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></p>	Allocation deleted
	Chichester Harbour Conservancy	WW3b – Allocation of land at Rookwood Road for 15 affordable homes: – This site is directly opposite the AONB boundary and would continue a linear form of development seen at Malthouse Cottages. Impact to the setting of the AONB would be lessened by securing a different shape of site with a narrower frontage to the A286 (Rookwood Road).	Allocation deleted
Proposed alternative / additional housing sites	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.	Allocation deleted
	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.
	Resident	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.	Allocation deleted
	Resident	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	Allocation deleted

	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	
Resident	Design must be carefully designed as visually the entrance to the village therefore impact	Noted
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"> • Bring it more in line with national policy to use previously developed sites for housing wherever possible, and • Provide a further housing land reserve and help it meet any increase in housing proposed for the Parish in the Local Plan. 	<p>New criteria-based policy for housing enables the Plan to deal with the changing situation at Local Plan level.</p> <p>The site at Bramber Nursery is not adjacent to a settlement boundary and its location is considered to be unsustainable.</p>

		<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"> • Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made • Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area • Contribute to the achievement of sustainable development • Be in general conformity with the strategic policies of the development plan for the area • Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations <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 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>	
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		<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"> • 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. • 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. • 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, contaminated or unstable land. The redevelopment of Bramber Nursery falls squarely in line with this guidance. <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</p>	
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		<p>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> <p>To mend the West Wittering Neighbourhood Plan to bring it 1) more in line with national policy and 2) ensure there is scope for it to comply with a higher Parish allocation in the Local Plan we propose the addition of Bramber Nursery as a new Policy allocation:</p> <p>Policy WW3D – Allocation of Land at Bramber Nursery for at least 9 dwellings to include a mix of house types reflecting local need including 30% bungalows and at least 30% of the dwellings to be affordable.</p> <p>We trust you will take these comments into account in preparing your next Submission Version Neighbourhood Plan.</p>	
Dlp of behalf of West Wittering	(Summary due to length of submission, see original for details)	Supporting Statement and Flood Risk and Drainage Feasibility Report to support the	This site could be considered under the new criteria-based

	Developments Ltd	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 be 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.	policy WW3.
	Welbeck Strategic Land	(Summary due to length of submission, see original for details) Letter from DMH Stallard and Vision Statement for land west of Church Road <ul style="list-style-type: none"> • The site is in a sustainable location, within walking distance of many services within the sustainable village of East Wittering. • The site can deliver circa 226 units of new housing. • The site is well enclosed from surrounding views and can be well integrated into its edge of settlement location. • Suitable access is simple to achieve, therefore there is no need for any major infrastructure upgrades in order to deliver the site. • The existing Hedgerow and trees pattern would be preserved and upgraded in certain locations. • A 10% net biodiversity gain will be achieved on the site 	This is a strategic site which should be considered through the Local Plan Review.
Policies 3a,b,c and 5	Resident	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 & 3 Springwell Cottages. The untreated sewage flows to the brook and on into Chichester Harbour. This occurred on 22/12/19, 16/2/20 & 29/2/20. 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.	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.
Page 24: Policy	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	Discuss with CDC and gather more evidence from survey.

WW3c (now WW4) Windfall Housing Development		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.	
	Chichester Harbour Conservancy	WW3c – Windfall housing development: – The policy wording seeks to resist the loss of small dwellings (1-2 bed) or bungalows and require that at least 30% of new dwellings on development sites are built as bungalows. It remains to be seen how reasonable this wording is considered to be by an Examiner.	As above
Page 25: Policy WW4 (now WW5) Principal Residence Requirement	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 and gather more evidence from survey.
WW4 4.13	Resident	No one thinks that West Wittering is “seemingly empty and deserted out of season”. <i>The huge number of houses built in the last few years in East Wittering and Bracklesham have created busy roads year round.</i>	Gather more evidence of impact of second homes from survey
4.14		The NDP, lasting to 2035, should avoid the commercial name AirB&B. <i>Suggest that “short term let” is used as a replacement term.</i>	Amend as suggested
	Chichester Harbour Conservancy	WW4 – Principal residence requirement: - Such a Policy has been supported in the High Court in relation to ST.Ives in Cornwall. The PC is not the local planning authority (LPA), so it remains to be seen whether CDC will support this Policy. The aim is to reduce the number of new second homes coming forward as this can affect the population stability and profile, which in turn can affect whether amenities and facilities remain viable in terms of the overall vitality of the Parish throughout the year. Ultimately it is the LPA which would be called upon to enforce such a policy, where evidence may come forward of it being breached.	Discuss with CDC and gather more evidence from survey.
Page 26: Policy WW5 (now WW6) Visitor	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 clarify

Accommodation 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	Resident	Change document layout	?
	Resident	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. <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>	Policy reworded
	Chichester Harbour Conservancy	WW5 – Visitor accommodation and facilities: - there is a concern here in the wording about avoiding the worst excesses of air b'n'b, in terms of parties disturbing existing residents. Caselaw relating to such accommodation should be carefully researched to ensure that the policy is more precisely and perhaps less emotively worded to set out some clear 'tests' as to when planning permission ought to be applied for in the written justification to the policy.	Policy reworded
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.	Settlement boundary moved to before WW3. No proposal to amend it other than to add East Wittering boundary as Local Plan
	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.	Amend as above
Page 27: Map 8 Map showing parade of 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.	Only one parade in the parish, policy wording amended.
	Chichester Harbour Conservancy	WW6 – Economic development: - the focus on developing brownfield land first is supported, although more could be said about redundant agricultural buildings' suitability for such accommodation, whether this inside or outside of the AONB, than is talked about in paragraph 4.17.	Policy amended to allow for conversion of agricultural or other rural buildings

	Chichester Harbour Conservancy	WW7 – Retail facilities:- The small parade of shops is clearly identified on a map base. Whilst the loss of retail floorspace is regrettable, the PC needs to be mindful of permitted development rights available, which could cause the loss of such floorspace without planning permission. The PC needs to weigh up whether it wishes to lobby CDC to promote an Article 4 Direction removing such rights.	Noted and reference to where planning permission is needed has been added to policy
Page 27: Policy WW6 (now WW7) 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 will need to be justification for development and viability will need to be assessed, in order to prevent residential use by proxy.	Discuss with CDC as not clear how removing the word ‘small’ would solve this issue. Not clear what is meant here.
Page 28: Policy WW7 (now WW8) Retail Facilities	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.	The parade is identified on the map. Cross reference added
Policy WW8 (now WW9) PROW and Quiet Lanes Page 28 Para 4.20	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
Para 4.21	Resident	WSCC should designate Quiet Lanes to enhance safe cycle routes	Noted
Para 4.21	Resident	Welcomes proposal for cycle routes but not by losing green verge. Concerned about risk of flooding if suitable drainage not included.	Noted
	Resident	Comment re cycle path suggests crossing over at Summerfield and onto Ellanore Lane	Noted
	Resident	New footpaths and cycleways are not identified in “Policies Map”. <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>	Add maps of quiet lanes
	Chichester Harbour	WW8 – Public rights of way and quiet lanes: - this wording mainly concerns itself with protecting the character of existing routes. The options for the improvement	Second paragraph of policy safeguards land for provision

	Conservancy	of Salterns Way seem reasonable and deliverable. No land is identified land to be safeguarded for the provision of new routes during the plan period, which is perhaps a missed opportunity. No objections.	of new routes
Page 29-30: Maps 9-12	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 (now WW9) and need to be incorporated within the Policies Map.
Page 31:	Resident	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.
WW9 (now WW10) Para 4.22	Resident	Coastal access needs to be monitored. Existing paths exclude horses.	Noted
	Chichester Harbour Conservancy	WW9 – Coastal enhancements: - The wording is supported. The written justification to the Policy could also usefully signpost CHC’s own ‘Sustainable Shorelines’ guidance for works at the coastline in the AONB. The ‘hinge’ at East Head could also usefully be discussed in terms of a strategy going forward.	Reference to Sustainable Shoreline guidance added to text.
Page 35: Policy WW10 (now WW11) Biodiversity and Geodiversity	CDC	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.” 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.	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
	Chichester Harbour Conservancy	<p>WW10 – Biodiversity, geodiversity and mitigating the impacts of climate change: - This wording usefully reinforces the ‘conserve and enhance’ ethos of CHC. No objections.</p>	Noted
Page 36: Policy WW11 (now WW12) Community Facilities and Open Spaces	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>	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.
	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</p>	Amend as suggested

		<p>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>	
	Resident	<p>Item 3. Football Pavilion doesn't make clear that this is also a recreational ground. No mention of third pub. Add Recreational Ground including tennis courts and play areas. Add The Shore Inn, probably used by local residents more than any other public house.</p>	Amend as suggested
	Chichester Harbour Conservancy	<p>WW11 – Community facilities and open spaces: - this usefully identifies community facilities and open spaces on a map base. No objections.</p>	Noted
WW12 (now WW13) 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 but not convinced suggested wording adds anything to national or local policy.
	Chichester Harbour Conservancy	<p>WW12 – Lighting: - this supports CHC Planning Principle 09 (referenced in the wording). However, strand 5 of the Policy may prove difficult to 'police' as most lighting on domestic properties, unless explicitly controlled by planning condition, is generally permitted development, where it is the physical appearance of the lighting unit (and any supporting structure) itself not the beam of light emitted, which can constitute development requiring planning permission.</p>	Noted. Criterion 5 seems to have been added by SG and I agree it is not appropriate for a planning policy.
Aspirations	Resident	<p>Add Aspiration 10 – To promote WW for business and leisure - high speed fibre optic broadband to all properties.</p>	Add
Community Aspiration 6	Resident	<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</p>	Check reference

Aspiration 7		documents on the website.	
	Resident	Support with modifications - Need to provide details of how to control traffic to and from Car Park	Include in community aspiration 2
	Resident	Support - Need to address traffic	As above
	Chichester Harbour Conservancy	Surprisingly, there is no discussion of the traffic management impact of West Wittering Beach and whether anything might be done to improve the congestion it creates.	As above
Delivery Plan	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
Delivery 6.2	Resident	To represent the DNP as “encouraging” development is surely not representative of the views of the village. <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>	Removed the word ‘encouraging’ but the neighbourhood plan cannot be anti-development.
Page 42: Appendix A Policies Map	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.
Appendix C: West Wittering	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
		Our representation relates to the Village Design Statement (VDS) - which is referred	VDS has only been updated not

<p>Village Design Statement (VDS)</p>	<p>to in the West Wittering Neighbourhood Plan at Policy No 4.3 onwards. 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 & 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>	<p>substantively changed. Wording referred to is as existing VDS.</p>
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WEST WITTERING NEIGHBOURHOOD PLAN

2017-2029

Public Consultation

Pre-submission (Draft) Neighbourhood Plan



By David Dixon



By Simon Carey



By Roger Pagram

SECOND Regulation 14 Consultation COMING SOON

This is to inform you that West Wittering Parish Council will begin consulting on its Draft Neighbourhood Plan from

Monday 12th July - Monday 6th September 2021 for 8 weeks.

This is an ONLINE Consultation only and during this period, we will be inviting comments on the Draft West Wittering Neighbourhood Plan.

Supporting background papers and details on how to respond will all be made available on the Parish Council website at

www.westwitteringparishcouncil.gov.uk

For those with difficulties completing online, hard copies can be viewed by appointment with the Clerk at the Parish Office.

To make an appointment, please call **07493 312378** or email **clerk@westwitteringparishcouncil.gov.uk**





Second Regulation 14 Consultation notice with further notice of extension displayed at pavilion windows and parish noticeboard

West Wittering NDP SECOND Regulation 14 Representations and changes made

The second Pre-submission WWNP and associated documentation was published for a second Regulation 14 consultation from **Monday 12th July to Monday 6th September** for a period of 8 weeks. The consultation was online only due to the coronavirus restrictions. This closing date was extended until the 24th of September 2021.

Availability of documents. Hard copies were available at the following locations:

- The West Wittering Draft Neighbourhood Plan
- The West Wittering Amended SEA
- The West Wittering Village Design Statement

Representations from statutory bodies, groups and residents were received. Of these,

7 representations were received from the following statutory bodies

- **West Sussex County Council**
- **West Sussex County Council Asset Management**
- **Chichester District Council**
- **Southern Water**
- **Natural England**
- **Historic England**
- **Environment Agency**
- **Highways England**

Representations were received from residents

Other Representations received from

- A Chichester Conservancy
- DMH Stallard LLP (on behalf of Welbeck Strategic Land (IV) LLP)
- West Wittering Memorial Hall
- West Wittering Church

Second Regulation 14 Consultation Representations (July – September 2021)

Org	Policy	Please give details of your reasons for support/opposition,	What improvements or modifications would you suggest?	Suggested Amendments (TBA)
CDC	Obj 10 Pg 18	'To provide small scale affordable housing in perpetuity for local people with a local connection.' This objective is not in line with the CDC adopted allocations scheme.	We would be concerned that if there no one eligible from West Wittering or the surrounding parishes bid on the properties then they would be untenable and left empty. This would not be acceptable bearing in mind the large number of households on the housing register with a housing need in the district. It is therefore requested this section and policy be removed or amended to reflect the Councils adopted Allocation Scheme	Objective amended to 'with a preference for'...to allow for cascade to others if no one with a local connection to West Wittering needs the accommodation
resident	3 - vision	I oppose the vision and objectives, as it is a 'protectionist' document, with no mention of equality, diversion and inclusion. This is shocking when considering the timeframe mentioned through to 2035. I realise that ed&i isnr a mandatory requirement in the plan, however this is no excuse, especially in a community such as West Wittering, where increased diversity would be a huge benefit today and in the future.	As above...the plan should be steered by a proactive approach to equality, diversion & inclusion.	Vision amended to include reference to 'an inclusive and diverse community which promotes and upholds equality for all'.
resident	5 para 2	Support	Take responsibility for the extra parking needed through the summer in West Wittering and create extra parking in the vicinity of his Ted but don't simply push the problem away with barriers towards East wittering.	Noted
resident	vision - 3.1 to 3.2	The parish plan must comply with the Local Plan. At this stage there is not a valid Local Plan. An emerging plan may invalidate details in the parish plan. However, it sensible to state the vision.	The A27 developments may impinge on the plan. In addition to change in the 'emerging' plan	Noted
resident	vision - 3.1	What is the significance of 2035?		Date removed from Vision
resident	vision - 3.1	What is the significance of 2035?		Date removed from Vision

resident	Para- 4.1 - 4.15	I support the plan	A synopsis of the whole document in preface	Noted, but it would not be possible to summarise the whole Plan in the foreword.
resident	Para - 4.1 - 4.15	West Wittering Neighbourhood Plan not duplicating policy of NPPF is there a danger things could be missed by both		The Neighbourhood Plan is just one element of the Development Plan and planning proposals must have regard to it all and national policy.
resident	Para 4.2	West Wittering Neighbourhood Plan not duplicating policy of NPPF is there a danger things could be missed by both		The Neighbourhood Plan is just one element of the Development Plan and planning proposals must have regard to it all and national policy.
resident	Para 4.2	As 4.2 could items be overlooked by both agencies?		The Neighbourhood Plan is just one element of the Development Plan and planning proposals must have regard to it all and national policy.
resident	Para 4.2	As 4.2 could items be overlooked by both agencies?		The Neighbourhood Plan is just one element of the Development Plan and planning proposals must have regard to it all and national policy.
CDC	Appendices	The Appendices need a little more consideration to identify what forms a policy map and what is being provided for information. Some maps appear related to policies but have no cross reference to a policy and as far as possible a single policies map should be provided.		Maps being amended.
CDC	Appendix c pg 61	The NP only needs to refer to the existing VDS in the design policy with a link to the location of the VDS.		No the VDS is part of the Neighbourhood Plan.
resident	Appx B - 1	Building directly north of HuntlnD Farmhouse	I can see no such building on Listed Buildings map page 58	Check
resident	Listed building - 11	K6 telephone box description incorrect	correct description	Check
resident	Listed building –	K6 telephone box description incorrect	correct description	Check

resident	Listed Buildings para 18	Redlands Farmhouse - the statement does not state it is a moated farmhouse,	include the word 'moated	Check
resident	Listed Buildings para 18	Redlands Farmhouse - the statement does not state it is a moated farmhouse,	include the word 'moated	Check
resident	Appendix II	Wells Farm Property Owners Ltd currently has 90 houses, NOT 86 as shown in the paper	Correct the information	Check
resident	APPENDIX V	Additional Comments	Mention of WWSC at Snowhill. This club is very important for children in community.	Noted
resident	APPENDIX V	Additional Comment	Speed reduction measure at access to Berry Barn lane from Cakeham Rd. Speed bump/ level crossing/ speed camera. This is very dangerous for children crossing to access beach via Berry Barn Lane	Noted
resident	APPENDIX V	Additional comment	More consideration of traffic pressure to access West Wittering beach in summer. This is wider than this document and needs a larger solution than just planning.	Noted, see Community Aspiration 2.
WSSC	CA7	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.		Check
resident	CA11	Short term lets retention of deposits, would this be left to owners to police?		Further work on details needed as part of Action Plan
resident	CA11	Short term lets retention of deposits, would this be left to owners to police?		Further work on details needed as part of Action Plan
CDC	General	It remains unclear, as set out in the CDC previous consultation response, as to whether it is being prepared in relation to the adopted Chichester Local Plan: Key Policies 2014-2029 (CLPKP) or to the		Para 1.5 clearly states this NP is prepared against the adopted Local Plan with regard given to the evidence base for the emerging Local Plan.

		emerging Local Plan Review (LPR).		Text relating to housing sites relocated into Background Paper to avoid confusion.
CDC	General	it is clear 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. CDC has yet to confirm the development strategy for the submission version of the LPR, which as indicated above is currently subject to testing to understand the implications of the emerging development strategy.	However, it is not clear in this version of the draft neighbourhood plan, that this strategy position has been recognised and clearly presented. Above all the plan should communicate whether or not it is looking to identify sites for development and, if not, if the remaining policies are being prepared in accordance with the adopted Local Plan or the emerging Local Plan Review. As things stand this is not clear to readers of the plan and the community.	Para 1.5 clearly states this NP is prepared against the adopted Local Plan with regard given to the evidence base for the emerging Local Plan. Text relating to housing sites relocated into Background Paper to avoid confusion.
CDC	General Foreward – pg 6	The first paragraph refers to the final version of the NP and the need for public consultation but does not indicate the dates of that consultation, it would have been more helpful if this section had included the consultation dates.		Reference to dates removed as this is out of the control of the WWPC at submission stage
CDC	General context Pg 6	This section still requires reviewing 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.		Para 1.5 clearly states this NP is prepared against the adopted Local Plan with regard given to the evidence base for the emerging Local Plan. Text relating to housing sites relocated into Background Paper to avoid confusion.
CDC	General SEA pg 8	The comments made previously in relation to the SEA (dated 6 April 2020) remain relevant in terms of the wider policies. However, it is acknowledged the update (June 2021) reflects the removal of the allocations from the previous version of the NP.		Removed and placed in Background Paper. Will be updated with new screening opinion on SEA and HRA

CDC	General Process pg 9	The NP text at paragraphs 1.14 – 1.19 would benefit from a brief description of the process, which the Parish Council has undertaken to prepare the plan, providing some context to the reader to allow them to understand how the community’s views have been taken into consideration and reflected in the Pre Submission Plan		Not necessary as covered in foreword and could be picked up in accompanying leaflet on the process.
CDC	General Title	The plan is indicated to cover the period 2019-2029 which is incorrect. The plan period for LPR is currently up to 2037. This point was made previously but does not appear to have been addressed and will need to be taken into account throughout references in the NP and SEA work.		Para 1.5 clearly states this NP is prepared against the adopted Local Plan with regard given to the evidence base for the emerging Local Plan. Text relating to housing sites relocated into Background Paper to avoid confusion.
CDC	General	However, bearing in mind the comments set out above under the ‘General’ section, the Parish Council may wish to consider the plan further in relation to its aims, what it is seeking to achieve for the local community and what policies are to be included. This may then alter whether the plan is to be considered against the adopted Local Plan (CLPKP) or the emerging Local Plan Review (LPR) and may help the Parish Council in setting out which new policies may risk being be superceded by policies in the LPR at some point if the NP moves ahead of the LPR.		Para 1.5 clearly states this NP is prepared against the adopted Local Plan with regard given to the evidence base for the emerging Local Plan. Text relating to housing sites relocated into Background Paper to avoid confusion.
CDC	General Stats pg15	The data from the 2011 census is now quite dated and you may want to think about proofing this with some more up to date information. The following may help with this: http://citypopulation.de/en/uk/southeastengland/admin/chichester/E04009943__west_wittering/		Update with projections.

CDC	General Pg 21	Housing-As indicated above in the comments in the 'General' section the position with regard to the overall development strategy has moved on and therefore this section needs careful consideration and review. The text does not present a clear and accurate picture of the position the parish is now in.	As currently drafted this section of the NP attempts to explain the rationale for not allocating housing sites to meet a housing requirement set by Chichester District Council. This section of the plan should be redrafted to set out clearly the Parish Council's position in relation to housing development. The NP has a number of objectives relating to the provision of housing, but ultimately only includes a general housing policy seeking to control any future housing development. It is helpful to set out the process which has been undertaken by the Parish Council to date, but it may be more appropriate to summarise this and provide a link to a separate document containing more detail.	Text relating to housing sites relocated into Background Paper to avoid confusion.
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Highways England	General	<p>We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the West Wittering Neighbourhood Plan, our focus will be on any potential impact to the A27. We have reviewed the consultation documents, and we have noted that the Neighbourhood Plan does not include or propose a specific number of future dwellings that have not already been agreed through either the existing or the emerging Chichester Local Plans. Although the Neighbourhood Plan lists a 200 dwellings proposal brought forward by Welbeck Homes, it also states that a development of this size is a strategic matter that should be assessed through the emerging Local Plan; Highways England agrees with this position. We support the commitments of the Parish to sustainable development principles contained within the Plan but have no further comments to make on its contents at this time. However, we welcome further consultation if and when new details regarding specific details new housing and / or employment developments will be added to the Plan.</p>		No amendments required as it is not intended to allocate housing sites.
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WSSC	General	<p>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 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. 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>		No amendments required as it is not intended to allocate housing sites.
WSSC	General	<p>General references to bridleways – It is requested that references to footpaths and cycle routes also include reference to bridleways to enable rights of way access to a wider range of users.</p>		Added into WW9

Southern Water	Other	<p>Southern Water is the statutory wastewater undertaker for West Wittering and as such has a statutory duty to serve new development within the parish. Although there are no current plans, over the lifetime of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements. We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2019) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'. Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.</p>	<p>Proposed amendment – To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows: 'New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan'</p>	<p>New policy WW14 added, but clarified that this will not apply to County Matters such as WWTW as this would be outside the remit of a Neighbourhood Plan.</p>
Natural England		<p>Natural England does not have any specific comments on the draft West Wittering Neighbourhood Plan.</p>		<p>Noted</p>
Historic England		<p>I am happy to confirm that we have no objections to raise and, as such our comments are limited to areas where we feel the plan policies could be amended to provide greater clarity or align more closely with government policy or guidance.</p>		<p>Noted</p>

resident	general	I support the whole plan and its objectives	I would like to see Section 106 obligations used to ensure new homes are not used as second homes	Whether WW5 is implemented via condition or s106 is for the LPA to decide.
resident	General Para 2.19	Concern over the number of 2nd homes and loosing the village identity	Cap on number of 2nd homes in the parish	WW5 requires all new homes to be principal residences but there can be no control over existing homes.
resident	general	I have read through this document. I thought it a balanced summary of the parish area and the pressures it is under. It recognises the characteristics of the area and the risks inherent in over development, in particular on infrastructure and the environment. I support the policies outlined in the plan and hope these are adopted as part of a working neighbourhood plan		Noted
resident	general	I have read through this document. I thought it a balanced summary of the parish area and the pressures it is under. It recognises the characteristics of the area and the risks inherent in over development, in particular on infrastructure and the environment. I support the policies outlined in the plan and hope these are adopted as part of a working neighbourhood plan		Noted
resident	general	Area north of Sandpiper Walk west side a recreation area and maybe Allotments for local people A centre for the second settlement for West Wittering		No landowners have put forward proposals for such facilities.
resident	general	Area north of Sandpiper Walk west side a recreation area and maybe Allotments for local people A centre for the second settlement for West Wittering		No landowners have put forward proposals for such facilities.
resident	general	I support the plan as a whole since it identifies the major issues facing the village including housing for local people, the rising use of short term lets and its impacts, and increasing light pollution which is damaging the drive towards dark skies		Noted

resident	general	second reg 14 draft NP, strat. environ Assess. and village design		Noted
resident	General Para 1.8	The housing target was revised and currently is set at 0	Letter sent to Parishes with this update	Noted, the Neighbourhood Plan does not allocate housing sites
resident	general	Too many houses too busy. It will be the ruin of this pleasant area	Restricted beach parking	Noted
resident	general	Redlands Meadow & Keefs Wood	Please see paperwork submitted to Parish Clerk	Check, additional Community Aspiration?
resident	general	Air quality not mentioned anywhere in the document should be checked on busy weekends.		Add request for air quality monitoring to Community Aspirations?
resident	General Para 3.2	Housing - Much more emphasis should be made on using Brownfield Sites ahead of Greenfield.		This is not a reasonable requirement at planning application stage as developers do not control other land.
resident	General	This gives a framework for future development of the Parish based on the considered views of the residents		Noted
resident	General	With a valid NDP in place we have more control over all aspects of planning in our area.		Noted
resident	general	General comment Peninsula mis-spelt throughout document		Corrected.
resident	n/a	Broadly I support the plan and thank you all for the hard work in pulling together.	I have no modifications. I would like to see any future plans/tweaks to incorporate/encourage digital businesses and technical tech talent who can 'work from home' to be encouraged to do so and base themselves locally, rather than commuting as this will bring year round economic value to the area, reduce traffic/transport load and does not involve any impact on the built environment, yet will create local jobs, economic activity and increased tax revenue to be reinvested locally.	Noted, WW7 supports small / micro businesses and home working often does not require planning permission.

resident	5	No mention of aircraft noise and cycle lanes	The amount of light aircraft noise is utterly ridiculous, with loop-the-loop overhead for hours at a time. I have often spent hours in the garden with almost no time without hearing this noise, so simply eradicated by demanding the aircraft fly a mile or two further out over the sea. Second, no one cares about specially designated cycle paths. What is needed is a network of good cycle friendly paths that are motor vehicle free. I have seen no map that shows them all, and we need many more in this wonderful flat landscape. Third, the one thing that matters most to all of us you have omitted. The almost inability to cross the A27 without being stuck in bad traffic. I know it's not in the area, but it is the most pressing need - to sort out this problem.	Aircraft noise is outside the remit of the Neighbourhood Plan. See WW9 and Community Aspiration 14 on cyclepaths.
resident	7.5.5	The tennis courts should be added as an amenity	As above	Included in WW12
CDC	Map pg41	Map showing parade of shops within parish - Map policy reference should be updated to refer to Policy WW8.		Maps being updated.
CDC	Map Pg42	Map 7 Saltern Way route proposals - Although these maps have now been consolidated into a single map it is not clear how this element of the policy map is to be implemented or used by development management? This policy and the supporting map could not be applied consistently as per Paragraph ID:41-041-20140306 that indicates policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise and supported by appropriate		Maps being updated.

		evidence.		
CDC	Map Pg 48-54	It would be clearer if these maps matched the title of the policy and referred to community facilities and opens spaces (Policy WW12).		Maps being updated.
CDC	Map 5 Pg 40	If this is the policy position for the settlement boundary, for it to remain unchanged from the adopted CLPKP, it would help to refer to Map 5 in Policy WW3 and for the title to refer to the NP rather than it being from the adopted CLPKP. Has any work been undertaken to see if there is a need for any minor revisions to the SPB as a result of updating to include any built form of development etc		Maps being updated. No intention to review adopted settlement boundary.
DMH Stallard LLP	Policies Map	Land at Church Road - The Policy Map fails to incorporate all of the existing settlement of East Wittering.	Proposals Map should be extended to include all existing part of the settlement (including dwellings at 'Sandpiper Walk') within the settlement boundary (see our letter dated 3rd September).	No intention to review adopted settlement boundary.
resident	Map 3 Pg38	Does not show the Sandpiper development or Northfields development		No intention to review adopted settlement boundary.
resident	Map 6 Pg41	Boundary of Valetta incorrect	Get the boundary right, if an investigation ensues at any time and the Council becomes involved it will be detrimental	Check

resident	Map showing green gap	Why aren't the fields nearest to the sea not included?	include these fields if possible	These fields are designated Special Protection Areas for birds and are not therefore under threat from development.
resident	Map showing green gap	Why aren't the fields nearest to the sea not included?	include these fields if possible	These fields are designated Special Protection Areas for birds and are not therefore under threat from development.
resident	S5 - allocation on site 8	Wider variety of services available at this location		The Neighbourhood Plan does not allocate housing sites
resident	S5 – second home	Avoid disruption noise and security caused by Airbnb	Only longer term letting allowed	See WW5 & 6
CDC	VDS Pg19	The text refers to the VDS forming part of the development plan; it would not be appropriate for the VDS to do this. However, there are different processes that the VDS can go through in order to be recognised in the planning process and CDC can advise on this further if required.		Not accepted and examples provided of where design documents have formed part of neighbourhood plans, conferring more weight than given to SPDs.
CDC	WW1	amend to refer to the 'most up to date' VDS as this will allow flexibility in the future.		No because the VDS is part of the Neighbourhood Plan. It will be updated when the Neighbourhood Plan is reviewed.
resident	WW1	Support	Additional dwellings should match surrounding properties particularly in Elms Lane	No amendments required
resident	WW1 Para 4.4	Development should reflect character of Parish, no dense urban street scene	No large scale development	No amendment required
resident	WW1 Para 4.5	Support	Please ensure the Strategic Gap between East and West Wittering is retained	No amendments required

CDC	WW2 Para 4.5 Para 20	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.		Further evidence provided in Background Evidence Paper
CDC	WW2 Pg20	As previously stated 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 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 would not support this policy		Further evidence provided in Background Evidence Paper
resident	WW2 Para 4.5	I live in the eastern part of West wittering and never received a paper survey. There were only 510 responses from a total of 1400 paper surveys delivered and yet you state there are 2700 living in West wittering. Continuing to keep the barrier between Eastern West wittering only dries development northwards and therefore further up piggery Hall Lane and Church Road which cannot sustain more Traffic.	To maintain this gap or further development to meet housing numbers should be cited in the Walnut tree area. There is excellent road access schools and facilities right there.	See Consultation Statement. The Neighbourhood Plan does not allocate housing sites.
resident	WW2 Para 4.7	25 bungalows on Church Rd land seems feasible. Agree bungalows should not be redeveloped to make larger dwellings.		The Neighbourhood Plan does not allocate housing sites

resident	WW2 Para 4.7	25 bungalows on Church Rd land seems feasible. Agree bungalows should not be redeveloped to make larger dwellings.		The Neighbourhood Plan does not allocate housing sites
resident	WW2 Para 4.7	My preference is for Option 3		The Neighbourhood Plan does not allocate housing sites
resident	WW2	I fully support the need to maintain the openness and rural character of the area between the two settlements in the village. However the policy does not mention the need to maintain the essential open space created by the fields to the north of The Strand. The paddocks to the south of Roman Landing are in the AONB, but must never be built on, as this area is a gem to be cherished.	Include my suggestions if necessary to preserve these areas from development.	The Neighbourhood Plan does not allocate housing sites
resident	WW2	The plan rightly places an important emphasis on preventing actual and perceived coalescence by maintaining the separation between the existing built boundaries of East and West Wittering. This gap is a key feature of the area and contributes enormously to the overwhelmingly rural character of this quiet corner of the Manhood peninsula.	I would recommend showing the Green Gap in all maps (especially Map 4) as extending to the existing built boundaries of West Wittering, for example to include as part of the recognised Green Gap the fields between Elms Lane, Wellsfield and Elms Ride which is described as one of the important "green lungs" of the village in the Neighbourhood Plan.	Further evidence about the Green Gap and the justification for its boundaries provided in Background Evidence Paper
resident	WW2 Para 4.7	would prefer land at Church Road not to be overdeveloped especially as a recent Welbeck application has been submitted but would support a small number of bungalows for local residents.		The Neighbourhood Plan does not allocate housing sites
resident	WW2 Para 4.6	To maintain the agricultural heritage of our village and habitats for wildlife and animals, please do not allow more housing to be built on good grade land.	I also suggest that to keep our beaches beautiful for locals and visitors that regular and more robust beach cleans take place.	The Neighbourhood Plan does not allocate housing sites. Pick up beach cleans in community aspirations?
resident	WW2 Para 4.5	Agree. Preservation of green gap		No amendment required

resident	WW2 Para 4.5	I agree strongly with the policy of preventing coalescence and I live on the East Wittering side of the strategic gap!	Prevent any building that could contribute to coalescence	No amendment required
resident	WW2 Para i & ii	Oppose. Coalescence could benefit if developed in a sympathetic way....	Use part of the land between east & west wittering for temporary car & bike parking to alleviate summer congestion & help local businesses	Further evidence about the Green Gap and the justification for its boundaries provided in Background Evidence Paper
CDC	WW3	Section D sets out that any affordable housing delivered in the parish “shall be delivered by a Community Land Trust or similar organisation”. It is understood that a neighbourhood plan cannot prescribe who delivers or manages the affordable housing.	It is recommended that this element of the policy be removed or amended to reflect the potential for the involvement of a wider range of registered providers and/or an established community land trust (CLT). If a community land trust intends to be the landlord or owner of any affordable dwellings, they will need to become a registered provider and regulated by the Regulator of Social Housing. Reference to the local connection requirement in perpetuity should also be removed for the reasons previously stated.	The phrase 'CLT or similar organisation' is sufficiently flexible to allow different types of providers and management. This is explained further in the Background Evidence Paper.
DMH Stallard LLP	WW3 Para 4.7-4.10	Policy WW3 fails to identify the most sustainable options for development and would under-deliver against local housing needs.	Policy WW3a should be reinstated, allocating land at Church Road for the erection of 70 dwellings, to ensure that the WWNP meets local housing needs identified by the Local Plan (see our letter dated 3rd September).	The Neighbourhood Plan does not allocate sites for housing.

WSSC Asset Mgt	WW3	<p>In summary our clients do not object to the draft Neighbourhood Plan at the current stage as there are no allocations proposed, but would like their representations to be noted. They wish to continue to make their land available for development, and in our view and as supported in the SEA, the development of The Site would have limited impact on the AONB. We respectfully request that the Parish continue to consider this site for an allocation should they wish to allocate land, and we would welcome a meeting with them to discuss the site further and alleviate any concerns they may have.</p>		<p>The Neighbourhood Plan does not allocate sites for housing</p>
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WSCC	WW3a	<p>criterion (f) – it is noted this criterion refers to maximising connectivity between sites and development to south and East Wittering to ensure residents can walk/cycle to access facilities. The Parish should note 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>		Noted
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Historic England	WW3	<p>We are pleased to see the reference to archaeological remains of interest in Policy WW3 bullet point e. We recommend amending this wording slightly to ensure that it meets government guidance that the weight given to preserving heritage assets is proportionate to their relative significance (for example it may be acceptable for development to result in the loss of the most common archaeological remains where it delivers public benefits, whereas the loss of more important remains, judged to have a national or special local level of interest, might not be justified).</p>	<p>The following wording might helpfully be substituted at bullet point e) - Any planning application should conserve and enhance any heritage assets affected in a manner appropriate to their significance. Proposals should demonstrate that potential effects for remains of archaeological interest have been considered, including a review of records for the site and surrounding area held by the Chichester Historic Environment Record. Where appropriate it may be necessary to supplement this with a more detailed archaeological assessment, potentially including on-site investigation works. The need for assessment and investigation should be determined through consultation with the Council's archaeological advisor. Where a proposal has potential to result in loss of archaeological remains of interest, it should be demonstrated that the layout and design of the development have been chosen to preserve remains in situ, giving the greatest priority to remains of national importance. Where archaeological remains are not judged to merit preservation in situ, it will be necessary to make an appropriate record before their loss and to ensure the findings of investigation are made available to the public within the neighbourhood plan area.</p>	Amendment accepted.
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Resident	WW3 Para 4.9	There is extreme risk in a large development as a consequence of this plan. The plan stipulates small developments of upto 25 units, but does not seem to have any authority in determining large developments e.g., 200 houses in Church Road. This confusion creates opportunity for developers to submit large development proposals	Explicitly stipulate that large housing developments contravene the majority of elements laid out in the plan- and that any large development will be strongly discouraged, as per the vision Statement 3.1, that, "West Wittering will remain a beautiful, tranquil and biodiverse part of the peninsula through to 2035, retaining its rural character while allowing for MINOR SYMPATHETIC developments meeting local needs." Anything beyond minor sympathetic developments should be strongly rebutted and not allowed.	Criterion b states that the scale of development must be proportionate to the size of settlement. It would not be reasonable to proscribe 'large' developments as that depends on context and impact.
Resident	WW3 Para 4.12	I would like to register my objection to any plans to build in the area opposite Walnut Tree caravan park. The objections are on the grounds that have been mentioned in every single objection to all the proposed planning proposals on the Manhood Peninsula; i.e. Possible flooding, sewage problems, traffic congestion, enough houses already on a peninsula with one road in and out.... and in an area of outstanding natural beauty.		The Neighbourhood Plan does not allocate housing sites.

Resident	WW3 Para 4.12	I would like to register my concern over the proposed development of 15 houses in the field opposite the Walnut Tree Caravan Park. This field is a beautiful part of West Wittering Village with the emphasis on the word village. This peninsula is so crowded already that the addition of 15 houses will just add even more strain on the infrastructure and the roads are very busy most of the time now. Please let us remain a village!		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	I am writing to lodge my objection to the proposal to build new houses in the field opposite Walnut Tree Caravan Park / next to Malthouse Cottages on Rookwood Road. My objections are that: <ul style="list-style-type: none"> • The village cannot cope with the current level of traffic - another 15 houses could easily equate to 30 more cars. • The sewage system is already over stretched. • This is an area of outstanding natural beauty that attracts holiday makers because of its unique countryside - we must protect our wild spaces 		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	I am writing to voice my objection to the Draft Neighbourhood Plan for its proposal to develop the field opposite Walnut Tree caravan park on Rookwood Road for 15 houses. This is a beautiful field and gives a sense of West Wittering's setting in the countryside. It would link up with Malthouse Cottages and create a sense of sprawl. Please can you confirm that this email will be recorded as an objection.		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	I object to the development of the above. I chose to live in the village of West Wittering rather than the sprawl of West Wittering which runs into East Wittering & Bracklesham. West Wittering village has a feel of larger unique houses & gardens with the sense of space. If you lose this then it becomes the same as the other local villages which aren't villages any more as they have been spoilt by building more houses & joining the villages together. Such a shame.		The Neighbourhood Plan does not allocate housing sites.

		I would rather the houses were built at the back of Malthouse Cottages.		
Resident	WW3 Para 4.12	<p>OBJECTION TO PROPOSED DEVELOPMENT AT ROOKWOOD ROAD 15 houses are proposed to be built in the field opposite Walnut Tree caravan park. I am shocked to read that there is a proposal to build houses opposite the Walnut Tree Caravan Park. Over the past 45 years there has been a constant flow of badly designed housing estates being built within the village. All of them appear to have been built with little thought to planning or the future of this once beautiful village. This village is clinging to what it has left of fields, the majority of them now gone. As with all the other villages on the peninsular, we cannot cope with any more houses – the infrastructure down here is broken. Houses here would ruin the village, it would create a sprawl, linking Malthouse Cottages to the shops and onwards and ruin the whole feel of the village. We do not have enough schools, drs etc. We have raw sewage being pumped into our sea, more houses will exacerbate this problem.</p>		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	<p>can I just say we are not happy about any buildings going up in the field Oppisite the walnut tree rookwood road . The road is congested enough but will bring nothing but misery !!! to us all . As the infrastructure can not take the extra volume of people and traffic!!!</p>		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.1	I oppose policy WW3 in allowing building adjacent to East Wittering boundary with Church Rd as its already proposed to build 300 houses on Stubcroft Farm site adjacent to Church Rd covered by East Wittering Parish Council	No new building should be allowed to exit onto Church Rd	The Neighbourhood Plan does not allocate housing sites.

Resident	WW3	The roads on and off the Peninsula are grossly inadequate traffic congestion in and out of W Wittering makes travelling a nightmare. Even the shortest journeys have to be planned.	No more homes built until existing roads improved and sewage facilities improved	Criterion g amended to include transport, access, drainage and water supply.
Resident	WW3 Para 4.7	if adding new housing can it be sympathetic/attractive. New housing in Bracklesham is red brick, modern and unattractive and does not add an attractive element to the area. I would suggest buildings are designed to be attractive and coastal using local materials.	pls see above. Also additional housing would add burden to transport/ traffic and shops already quite busy.	See design policy WW1 and amended WW3 g).
Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	We do hope that you consider the constructive and proactive views that we have put forward. Furthermore, that they are taken in the manner and good spirit of a concerned inhabitant, neighbour, landowner and notwithstanding, third generation business owners and employers for over 75 years, residing within our beautiful village of West Wittering.	The Neighbourhood Plan does not allocate housing sites.

Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	The site is situated outside of the settlement boundary and is not contiguous to any part of this boundary. In contrast, the development proposal not only encroaches to nearby farmland and sits adjacent to the CHAONB, but furthermore abuts a working farm for animals, livestock and employment business. The business has operated for 75 years and is established with morning working practices and procedures of running a successful business. West Wittering sits within Chichester District Council Policy S2 Settlement Hierarchy's 3rd tier which is termed as a 'service village'. The NPPF does not refer to 'settlement boundaries' but does however dictate and resist isolated homes being built, citing to be 'avoided', as per paragraph 79 of the NPPF. The development proposal recognises and may address aspirations of locally assessed need (LAN) as set out in the WW (draft) NP, although and as will be explained later, 'could set a precedent of future development'.	The Neighbourhood Plan does not allocate housing sites.
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Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	Fig. 1.2 Blue shaded area denoting extent of CHAONB proximity Listed Heritage Building A Grade II Listed building lies within 75 metres of the site as identified below. The development proposal will undoubtedly affect the setting and character of this property. Walnut Tree House: Listing number: 1026083 described as ‘C18. Two storeys. Three windows. Stuccoed. Tiled roof. Glazing bars intact. Doorway in moulded architraves surround with pediment over’. The site lies within 75 metres from this historic listed building and would directly impact on the southerly views from the property. The level of harm to the property and the setting of the listed building would be established through a full heritage assessment and consultation with Historic England and Conservation Officers.	The Neighbourhood Plan does not allocate housing sites.
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Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	The topography, local vegetation, mature natural habitat hedgerows, category A trees in and around the site impacts the immediate visual relationship to the AONB with any built form. In conclusion, there is a direct landscape character relationship here, accepting the more direct visual relationship is affected by distance (albeit adjacent) and topography. The site currently clearly enjoys a visual link, due to its open character, with the valued landscape between the AONB and beyond. Any built form will have an immediate level on harm and impact the setting of the CHAONB and any proposed change in the flow of openness, views, and landscape setting. Para's 176 and 177 of the NPPF July 2021 bolster how circumstances could be moderated and assessed of how this could be met by developing outside of the designation (CHAONB). Reference to alternate proposed land development is mentioned in due course.	The Neighbourhood Plan does not allocate housing sites.
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Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	The site lies adjacent to the Chichester Harbour AONB (CHAONB) designation, and within close proximity to CH SSSI Conservation area designation and Policy refers to any development either within, just outside or visible from the designation be carefully considered by all statutory consultees and LPA's whom it affects. Chichester Harbour Conservancy along with the LPA's, as with all AONB designations and authorities, will assess the visual impact to the landscape setting alongside nature conservation. The WW3b development proposal has particular sensitivity to the edge of the CHAONB and its far-reaching viewpoints. Built form will interrupt this relationship and furthermore, the landscape area to the west of the AONB boundary around the B2179 is sensitive and falls within the wider setting of the AONB. Much of this landscape would justify the status of a 'valued landscape', consistent with the guidance in the NPPF at paragraph 170.	The Neighbourhood Plan does not allocate housing sites.
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Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	Fig. 1.1 Proposed Site Area Comments on the Development Proposal By virtue of proximity to Chichester Harbour AONB Situated within the landscape setting of a Grade II Listed building Outside the settlement boundary, not contiguous with built form of the settlement boundary Ecological Issues within the proposed site: Bat movement corridors Biodiversity Net Gain (BNG) Mature natural habitat hedgerows Landscape and natural environment surrounding Tree patterns LPA Strategic flood risk assessment revision April 2021, development site proposal alternatives already recognised HELAA report ref: HWW0002a Chichester Harbour AONB Designation	The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you	The Clerk, West Wittering Parish Council. In response to 'Comments on the Pre-submission (Draft) Neighbourhood Plan' WEST WITTERING DRAFT NEIGHBOURHOOD PLAN 2019-2029 REG 14 CONSULTATION: Deadline Monday 6th September 2021 'LAND AT ROOKWOOD ROAD, WEST WITTERING' REF: WW3b The following letter sets out the specific material considerations, constraints, and concerns for the 'development proposal' at the above address. Criteria are in no particular order and relate directly to policies embodied within either Chichester District Council (LPA), National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and/or West Wittering Draft Neighbourhood Plan (DNP).	The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as pictures cannot be uploaded to this survey portal. Therefore	Please see email to the Clerk of West Wittering PC dated 1st September 2021. The contents of the email would not upload to this survey, thank you.	The Neighbourhood Plan does not allocate housing sites.

		please refer to those documents for completeness.		
Resident	WW3 Para 3.1	The Vision Statement is not clear on the level of housing to meet "local needs".	I would like to see the Plan clearly delineate the housing needs as determined by each of a) Housing Needs Assessment for West Wittering or b) the strategic development needs set out in Local Plans (1.4) or such figure as is determined by central government. The Neighbourhood Plan should be transparent about the rules determining housing numbers and show the figures for each. My understanding is that local needs as determined locally are met by existing development.	The Neighbourhood Plan does not allocate housing sites. The adopted Plan housing figure will be met by existing planning permissions and the housing number for West Wittering in the emerging Plan has yet to be decided.
Resident	WW3 Para 4.7	Even building 25 more homes in Church Road would give the green light to developers who want to put mass developments in Church Road and the surrounding area. to	A review of what brownfield sites are available for smaller developments e.g. up to 5 houses to meet the allocation.	The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 47	All new housing exits on to Church Road which is not in West Wittering	Option 4 should be preferred	The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Obj 10	Oppose as small scale housing should be for a wider group of people, not just locals. What about disadvantaged families from uk cities or refugees from abroad?	As above think about how new people can enhance our local community and build housing to help welcome them vs just focus on those of us that are here already.	There is no restriction on who can purchase or rent any open market housing other than it should be their principal residence. The preference for those with a local connection for affordable housing can include those who work in the area.
Resident	WW3 Para d	No provision for temporary or care workers or new hotels	Include some	WW6 supports visitor accommodation which could include a hotel. The preference for those with a local connection for affordable housing can include those who work in the area.

Resident	WW3	Sandpiper Walk Estate is not included in the housing policies and Draft NP.	50 houses should be included in housing consideration and numbers for the NP, especially in consideration of pressure on the sewage system and flooding to existing housing estates, when more get added. It would also prove useful to check that ditches, included in housing designs, are in working order.	The Neighbourhood Plan does not allocate housing sites or amend the existing adopted Development Boundary.
Resident	WW3 Para d	Can we ensure that the other 70% of homes are for permanent residency in perpetuity?	Ensuring the homes are for permanent residency in perpetuity	See WW5 requiring new dwellings to be principal residences (i.e. not second homes).
Resident	WW3 Para 9g	Before further housing built an upgrade to sewage facilities to prevent flooding and discharge into the sea		See WW3g) which includes sewage infrastructure.
Resident	WW3 Para 4.14	Your policy is based on flawed data. There are 2700 adults in West wittering not 1400 (your data) Which makes your response rate about 18%.	As the population is increasing we have a duty to supply housing to all members, and bungalows are not suited to families .. We need to provide for younger people	Clarified in Consultation Statement
Resident	WW3 Para 4.7	Support Option 4 as homes for local people		The Neighbourhood Plan does not allocate housing sites.
Resident	WW3 Para 4.11	Strongly in favour of trying to boost affordable housing, Community Land Trust idea is an excellent suggestion. I think long term sustainability requires provision of some homes which are affordable to those in local employment; service sector, key workers, retail etc.		No amendment required
Resident	WW3 Para 4.12	Church Land Trust have put forward land development in Rookwood Road, where abouts?	Give details of position in the road.	Paragraph deleted
Resident	WW3 Para 4.12	Church Land Trust have put forward land development in Rookwood Road, where abouts?	Give details of position in the road.	Paragraph deleted
Resident	WW3 Para 4.14	I strongly agree that existing bungalows should be protected		No amendment required
Resident	WW3 Para f	Oppose. Developers should contribute to improving cycle routes in the area,	As above. Plus should contribute to a budget to improve safe cycling from chichester to west & east wittering	See WW9

Resident	WW3 paragraph Pg 22	Add Prior to occupation afterBroadband		Added before all 'including' so applies to all infrastructure.
Resident	WW3	Add para h) Brownfield sites must be developed before greenfield sites		Not reasonable to prevent greenfield sites from being developed ahead of brownfield because developers have no control over land in other ownership.
Resident	WW3 Para 4.12	Oppose: Please see comments section below. A comments document have been both emailed and a hard copy posted to the Clerk of WWPC as the full document and pictures cannot be uploaded to this survey portal. Therefore please refer to those documents for completeness. Thank you.	The topography, local vegetation, mature natural habitat hedgerows, category A trees in and around the site impacts the immediate visual relationship to the AONB with any built form. In conclusion, there is a direct landscape character relationship here, accepting the more direct visual relationship is affected by distance (albeit adjacent) and topography. The site currently clearly enjoys a visual link, due to its open character, with the valued landscape between the AONB and beyond. Any built form will have an immediate level on harm and impact the setting of the CHAONB and any proposed change in the flow of openness, views, and landscape setting. Para's 176 and 177 of the NPPF July 2021 bolster how circumstances could be moderated and assessed of how this could be met by developing outside of the designation (CHAONB). Reference to alternate proposed land development is mentioned in due course.	The Neighbourhood Plan does not allocate housing sites.

Resident	WW3	<p>WSSC are broadly in support of Policy WW3, however, would request that some elements be given further consideration. These elements are highlighted in the following paragraphs. Policy WW3 stipulates a number of criteria that be considered and development proposals be in accordance with. Criteria d) of Policy WW3 requires the affordable component to be delivered via a community land trust or similar organisation. We would suggest that the policy be amended to include ‘where possible’. Whilst every endeavour would be made to incorporate such dwellings, there could be an instance where such provision is not possible or feasible and currently and a Registered Provider would be unlikely to meet this criteria. The suggested amendment would therefore allow for a level of flexibility if required. Further, criteria d) also specifies that the affordable housing should be retained in perpetuity for those with a local connection. Again, whilst WSSC support this, there is no flexibility as to what is considered ‘local’ and the District wide allocation policy should be considered. So whilst we support the approach for properties to meet local needs, but this should be clearly defined. In addition, to avoid empty homes, there should be an appropriate cascade so that the affordable homes can be made available for those beyond the definition what the Parish consider ‘local’.</p>		<p>The wording 'CLTs or similar organisations' provides sufficient flexibility for other providers. The words 'with a preference for' has been added in front of 'households with a local connection' to allow for a cascade to others if no-one with a local connection requires accommodation.</p>
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Resident	WW3 Para 4.9	Restriction of large estates being built in the area	I would like to see the policy limit the number of houses that can be built at one time by developers. All the current applications show how dangerous this is at the moment and we do not have the infrastructure	It would not be reasonable to restrict the size of site as this will depend on context and impact.
Resident	WW3 Para 4.6	Should state that 25 has been reduced to 0		This part of the paragraph deleted
Resident	WW3 Para 4.8	There is not a Northfield Road in WW		Paragraph deleted
CDC	WW4 Pg 24	Concern remains 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	Criterion deleted as duplicates WW3 d) which has been amended to only apply to sites of 10+ as smaller sites would not be required to provide affordable housing and percentage mixes are harder to achieve.
CDC	WW4 Para 4.11-4.13 Pg23	This version of the NP has been updated to take account of the comments made by CDC on the January 2020 Pre Submission version. However, the inclusion of paragraphs 4.11, 4.12 and 4.13 are not necessary. As previously stated by CDC, by definition a rural exception site is an exception to policy as it would not come forward under usual circumstances. As such, this site cannot be allocated within the neighbourhood plan	it is recommended that these paragraphs are deleted. For reference if the Churches Trust were to dispose of the 15 affordable units to a CLT, the CLT would need to first become a registered provider. It may be helpful to provide a more general commentary on the Parish Councils intention to explore opportunities for the provision of affordable housing in the Parish.	Paragraph 12 has been deleted. Paragraph 11 is still needed as a cross-reference to the Local Plan exception sites policy. Paragraph 13 has been amended to omit specific mention of the Churches Trust. CLTs explained further in Background Evidence Paper.
Resident	WW4 Para 4.5	Farming land is imperative but the gap leads to 2 villages west part has full amenities wide spaces while east is cramped.	More amenities in east part perhaps with Scots Holiday site	No such proposals put forward by Scots Farm
Resident	WW4 Para 4.5	Farming land is imperative, but the gap leads to 2 villages west part has full amenities wide spaces while east is cramped.	More amenities in east part perhaps with Scots Holiday site	No such proposals put forward by Scots Farm
Resident	WW4 Para 4.12	Rookwood Rd and this stretch in particular is one of the busiest in the Peninsula. Inevitable increase in traffic and road use. Not safe to cross at peak times.	Do not permit strip development. Unsightly detrimental to environment and community. These points have been recognised nationally for years.	Paragraph 12 has been deleted.

Resident	ww4 Para 4.14	No more housing required in this area Bungalows will just be purchased as second homed	How about a recreation area or maybe allotments so that second settlement will benefit. At present there is no recreation area or allotments and it is a well populated area.	WW5 would restrict all new dwellings to principal residences. No land has been put forward by landowners for recreation areas or allotments.
Resident	WW4 Para 4.9	Good green agricultural land going under concrete flooding does happen on land increase sewage problems	Recommend only housing to locals only planning passed Sandpiper dev has a large proportion of holiday homes around us 30% holiday homes	WW5 would restrict all new dwellings to principal residences.
Resident	WW4 Para 4.9	Good green agricultural land going under concrete flooding does happen on land increase sewage problems	Recommend only housing to locals only planning passed Sandpiper dev has a large proportion of holiday homes around us 30% holiday homes	WW5 would restrict all new dwellings to principal residences.
Resident	WW4 Para b	Support the policy but perhaps should include reference to the need for rented affordable housing	Add reference as above.	Covered under WWWW3d)
Resident	WW4 Para 4.14	IN favour of preventing loss of smaller units		No amendment required
Resident	WW4 Para 4.12	Support 15 rented affordable home for local people		No amendment required
Resident	ww4 Para 4.11	2108 should be 2018		Amended
CDC	WW5 Pg25	Principal residence requirement - This policy still requires more detailed justification; the inclusion of a similar policy in the St Ives NP is helpful in terms of possible wording but such a policy needs to be based on local evidence here to provide 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.	More detailed evidence included in the Background Evidence Paper
Resident	WW5	Too many new homes being bought as holiday lets	A maximum time should be allocated for letting, stop housing being bought and sold purely for profit.	This matter is dealt with in WW6 but whether short term lets require planning permission is more complex than setting maximum times.
Resident	WW5	Too many houses being bought as holiday lets.	Max time should be allocated for short term holiday lets to avoid housing being sold purely for profit	This matter is dealt with in WW6 but whether short term lets require planning permission is more complex than setting maximum times.

Resident	WW5	I fully support the policy outlined in this policy		No amendment required
Resident	WW5	I fully support the policy outlined in this policy		No amendment required
Resident	WW5 Para 4.15	Strongly in favour of this. New homes should be for permanent residents.		No amendment required
Resident	WW5 Para 4.17	Agree tourism benefits are significant to local economy		No amendment required
Resident	WW5	Principal residential requirement - There needs to be some provision for people buying a property with the firm intention of retiring to live full time in the area in the near future e.g. next 5 years.	Possibly this could be addressed via a covenant?	This matter is dealt with in WW6 but whether short term years require planning permission is more complex than setting maximum times.
Resident	WW5	Fully support to maintain the village as we need to maintain a resident community		No amendment required
Resident	WW5 Para 4.15	I support this policy but it seems that the suggested conditions would be very difficult or even impossible to enforce.	Which overseer is going to require a property owner to present proof of primary residency? This doesn't seem to be workable in practice., in which case it seems futile.	This matter is dealt with in WW6 but whether short term enforce require planning permission is more complex than setting maximum times.
Resident	WW5 Para 4.18	There should be some form of governance over second homes and use of those rented out (AirBNB)		This matter is dealt with in WW5 and WW6 insofar as it requires planning permission.
Resident	WW5			
Resident	WW5 Para 4.15	New homes only as principal residence		No amendment required
CDC	WW6 Pg 27	Policy WW6 Visitor Accommodation and Facilities - The second sentence of the policy may be difficult to deliver as aspects lie outside the planning process.		Criteria reflect residents concerns about short term lets and are similar to impact criteria used to determine if the use requires planning permission.

Resident	WW6 Para 4.18	Too general. Does not reflect the detailed nuances of this issue. Holiday lets, carefully managed and administered, can provide important local employment, income for retailers and other small businesses and rest and relaxation for families with links to the area who cannot themselves live in the area full time due to lack of local employment opportunities. And opportunities to stay close to family members who live locally.	Work with landlords and house owners to agree criteria to enable short term lets (therefore generating local employment, income and family support services, as listed above) but agree a reasonable and common sense set of criteria to ensure short term guests are asked to conform to the same reasonable standards that permanent residents themselves are.	Criteria reflect residents concerns about short term lets and are similar to impact criteria used to determine if the use requires planning permission. Some locations and detailed layouts will not create problems for residents and therefore planning permission could be granted.
Resident	WW6 Para 4.18	we have personally never found any holiday rentals staying to be noisy or problematic - I think it would be positive to have a certain amount of holiday lets in the village to support local businesses and pubs etc.	to allow a certain amount of holiday lets to small groups who are respectful and support the villages.	Criteria reflect residents concerns about short term lets and are similar to impact criteria used to determine if the use requires planning permission. Some locations and detailed layouts will not create problems for residents and therefore planning permission could be granted.
Resident	WW6 Para 4.18	lack of on street parking for residents when Airbnb houses are let to large groups	Make is necessary for these properties to provide off street parking for guests.	Criteria include impact on street parking.
Resident	WW6 Para 4.18	When houses are let for Airbnb lack of parking available for residents.	Make is necessary for these properties to provide off street parking for guests.	Criteria include impact on street parking.
Resident	WW6 Para 4.18	The Planning Authority needs to take more interest in requirements for Change of Use to C3 and/or CMO. They appear to be not at all interested and some owners are openly advertising their properties available for large groups without the appropriate Change of Use consent.	The policy needs to be stronger so that letting to large groups is made very difficult or even impossible where the setting is likely to cause disruption to neighbours	Inclusion of policy already heightens issue and not clear how it could be made stronger and remain reasonable and enforceable.
Resident	WW6	I fully support this policy because I am very concerned about the use of housing for short-term lets and the disruption this causes to residents		No amendment required
Resident	WW6	I fully support this policy because I am very concerned about the use of housing for short-term lets and the disruption this causes to residents		No amendment required

Resident	WW6 Intro	Oppose, as visitors should be made welcome to help local community.	Landlords should be given permission for short term lets/multi house use, with expectation to incentivise good behaviour from tenants	Policy does not stop planning permission being granted where use does not harm the area.
Resident	WW6	This is solely a negative and restrictive policy. It will also allow the locals to victimise new arrivals.	There is no provision for any extra parking anywhere in West wittering, therefore where do you expect the extra cars to park.	Policy does not stop planning permission being granted where use does not harm the area.
Resident	WW6	Fully support the need to prevent private dwelling being converted to holiday accommodation for multiple occupation,, or short term lets	none	No amendment required
Resident	WW6 Para 4.18	I agree that party houses should be restricted using planning laws. However family groups have rented houses for holidays down here for decades and therefore the limit of 6 in a house may prevent family groups getting together. Also, in our road we have had large groups staying in properties that are intended for much smaller numbers.	The rental agencies and platforms should be required to provide a warden service to ensure that visitor numbers in properties are adhered to and that disturbances are dealt with quickly. They should also be required to ensure that their Ts & Cs reflect local requirements so they can eject guests who break the rules.	Homes become 'Houses in Multiple Occupation' when 6 or more people are living in them as 6 different households - it doesn't limit the size of families living as one household.
Resident	WW6 Para 4.18	Second homes are mainly larger properties excessively developed to accommodate 6 or more people should not be given HMO status		This is a legal matter not a planning policy one.
Resident	WW6 Infra	I oppose. AnyI oppose. Any levies collected Should go to district Council and put towards overall infrastructure in the peninsula. And your journey is taken from West with during has to go through other parishes, nobody has to go through ours	All new developments must contribute to improved and direct travel between Chichester and the south coast of the peninsula. There is no mention of the improved cycle link For the commuter in this report. A huge error under failure to see the greater picture	Not relevant to WW6
Resident	WW6 Para 4.18	Support second homes change from C3 dwelling and any HMO and new build require planning permission not to be used as second homes on brown sites only		Not able to restrict development to brownfield only as would conflict with national policy.
Resident	WW6 Para 4.18	Support second homes change from C3 dwelling and any HMO and new build require planning permission not to be used as second homes on brown sites only		Not able to restrict development to brownfield only as would conflict with national policy.

CDC	WW7 Pg27	There is no definition of what constitutes ‘small businesses’ in this context and the reference 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 microbusiness instead, which generally employs less than ten people. In addition, suggest that only if there is no other available space for businesses within the area, brownfield sites could be used. There will need to be justification for development and viability will need to be assessed, in order to prevent residential use by proxy.	Amended text and policy wording to refer to small / micro businesses with up to 10 employees.
Resident	WW7 Para 4.2	Support	Brownfield sites should be available for housing	Not relevant to WW7
CDC	WW8 Pg 28	The loss of retail facilities should make cross reference to the marketing advice contained in the CLPKP and taken forward into the LPR. The PC also need to be aware of changes that may result from the Government’s amendments to permitted development which may potentially undermine this identified area.		Supporting text added to cover these points.
Resident	WW8	can I suggest the council also considers ways to improve the local landscaping, outdoor furniture and other facilities provided for both permanent residents and visitors near the shops of West Wittering. Currently there are no areas for people to rest, sit, enjoy an ice cream or talk to each other.	I believe this would help create more of a sense of community, friendliness, in a village which currently has very few community facilities to enable residents to meet informally and to encourage connections between residents, especially those who are elderly, live alone, are isolated or vulnerable.	Supporting text and policy wording added to cover these points.
Resident	WW8 Para 4.23	Our children are now at an age where we can cycle together as a family and we are pleased to have cycleways to use!	The extension of current cycleways, ensuring a complete route to use and more would be great!	Included within Community Aspirations
CDC	WW9 Pg28	It would be helpful if the relevant map reference was added to the policy, and that the map cross-referenced the policy reference. It would also be more accurate for the title of Map 7 to be renamed to match the policy as the map covers more than just the Saltern Way route proposals. The last sentence of para 1 of the policy would be difficult to use as a reason for refusal and should be removed.		Maps to be amended

WSSC	WW9	An increase in traffic alone may not be sole reason to require development to contribute towards mitigation schemes. Please check this to ensure it is consistent with para 110 of NPPF 2021.		NPPF 110 relates to when refusal of planning permission would be justified on highway grounds. WW9 relates to circumstances when increased traffic impacts the amenity of PROWS and Quiet Lanes, reducing their attractiveness to walkers, riders and cyclists.
WSSC	WW9 Para 4.23 Pg 28	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.		The word 'could' allows this flexibility.
Resident	WW9	I support making corner of Salterns Way and Rookwood Rd safer		Noted
Resident	WW9 Para 4.23 -4.24	Would support additional cycle ways or expansion of existing paths to properly accommodate cyclists - but not to the detriment of pedestrians. There are too many cyclists behaving badly on footpaths that prohibits cycling. These cyclists are a menace to walkers and often rude and inconsiderate. They are intolerant of anyone inhibiting their unfettered progress. There needs to be proper separation of cyclists from pedestrians in any expansion plans	Separate paths or at least delineated lanes for cyclists and pedestrians	This is a detailed matter to be addressed at the design stage.
Resident	WW9	I fully support this policy. Any changes to rights of way and quiet lanes would affect the local environment		Noted.
Resident	WW9	I fully support this policy. Any changes to rights of way and quiet lanes would affect the local environment		Noted.
Resident	WW9		A pedestrian crossing is essential across Church Road, into Sandpiper Walk Estate for the safety of the residents and children who wish to travel to school and the shops.	Noted. Suggest this is included in a list of infrastructure to be produced as part of the Action Plan (see new Community Aspiration 13)

Resident	Ww9	I support.	The implementation of a dedicated cycle route between East wittering to Chichester direct. It's in line with government policy, emissions, health. To support any further development With only one mode of transport for the whole peninsula he's not exactly forward-looking	Noted
Resident	WW9 Para 4.21	Support. Walked personally every 6 months to monitor upkeep		Noted
Resident	WW9 and 10	I support, but care must continue to avoid any changes that detract from the unique and attractive appeal of WW Beach.		Noted
Resident	WW10	No recognition of the need to improve the foreshore path from Shore Road westwards so that it can be used by people in wheelchairs/prams/push chairs. This could be achieved by sensitive soft landscaping without the risk of domestication.	We have seen handicapped people struggle to get along the path only to have to give up. So sad!	Amendments to text and possicy to pick up these issues.
Resident	WW11 short term let	Oppose. Although this aspiration of being neighbourly is welcome, this policy he's open to wild abuse from both sides of an argument about noise.	This policy will create NIMBY-ism It is remarkably restrictive and quite repellent	Not relevant to WW11
Resident	WW11 Para 4.26	Support		Noted.
CDC	WW12 Pg31	Some of the open spaces identified in the appendices may be more appropriate for consideration as local green space designations and it is not clear if the PC has considered this option? There is also no indication as to how the need for the retention of a community facility would be assessed; it may help, for example, to refer to the Appropriate Marketing Guidance in Appendix E the CLPKP in this respect.		WWPC considered local green space allocation but decided not to take this forward as most of the green spaces are owned by the PC and therefore protected.
Memorial Hall	WW12		2. Memorial Hall - Community Use	Noted
Resident	WW12	Elms Lane tennis club only has 3 years left on its lease and a new site is required for the Club		Noted

Resident	WW12	There are significant open spaces allotments sports grounds and play areas in the village of West Wittering and Bracklesham but apart from a small skate park area nothing in between would it be possible to purchase the land at Church Rd by means of applying for grant /loans/donations fundraising and then the land could be used for recreation dog walking sporting activities childrens play area a wildflower eco area and allotments for the local residents.		Noted but not a matter for the Neighbourhood Plan.
Resident	WW12	Since the pandemic it has become apparent that green open spaces are paramount to sustaining ones mental & physical health. Is it possible to purchase the land at Church Road to provide a much needed recreational space as West Wittering & Bracklesham are the only places to have these with nothing similar in between. Amenities could include recreational space/dog walking area, a children's play area, wild flower meadow/ecological area to help retain the wildlife & allotments. All this would benefit the local residents considerably.		Noted but not a matter for the Neighbourhood Plan.
Resident	WW12	Little Art Gallery, New Waves Box Beach House not included	Suggests the Council disregards these businesses. Suggest analysis is flawed	Check whether within parish
Resident	WW12	The car park, in Marine Drive, should not be included as a Community Facility.	Open sport areas, playgrounds, allotments and family centres are very much needed to the East of the Parish to provide local leisure facilities and support to the growing population.	No reason given for deleting car park.
Resident	WW12	There are significant open spaces allotments sports grounds recreation and play areas in the village of West Wittering and Bracklesham but apart from a small skate park nothing in-between would it be possible to purchase the land at Church Rd by means of applying for grant loans donations fundraising and then the land could be used for recreation dog walking sporting activities childrens play area and a wildflower eco area and allotments for local		Noted but not a matter for the Neighbourhood Plan.

		residents.		
Resident	WW12 Para 4.28- 4.32	We are amply served in West Wittering Parish		Noted
Resident	WW12 Para 4.33	Parish Council light in car park is always on at night after street lights go off.	Suggest Council gets it fixed before proposing WW12, 1 2 3 and 4	Noted but not a matter for the Neighbourhood Plan.
Resident	WW13 Para 4.33	I could only support this policy with modifications. Parts of the village are under-lit to the point where safety of pedestrians is compromised.	Lighting nuisance should be controlled but this policy and a general desire for more darkness goes too far.	Policy does not prevent lighting but requires that design protects dark skies.
Resident	WW13	Fully support the need to prevent development that creates unnecessarily increased levels of light		Noted.

Conclusion

The consultation activities with residents and statutory bodies have been carried out since the Parish Council decided to embark on developing a neighbourhood plan for West Wittering Parish. Residents have had opportunities to become informed and engaged about the WWNP as well as opportunities to provide information, express their views and concerns and make suggestions for improvements.

This Consultation Statement captures but not limited to the consultation and engagement activities undertaken. It is therefore considered to comply fully with Part 5, Section 15 of the Neighbourhood Planning (General) Regulations, 2012.

Table 1: Main Documents Produced for the West Wittering Neighbourhood Plan

Document	Description
WWNP Pre-Submission Plan	The draft plan which was put out for consultation to residents, organisations and statutory consultees
WWNP Consultation Statement	Statement of how consultation was carried out to meet statutory requirements
WWNP Basic Conditions Statement	Statement of how the Plan meets the statutory basic conditions
WWNP State of Parish Report	Profile of the parish with summaries and evidence of focus groups and survey findings
West Wittering Village Design Statement	A detailed report of the various character areas of the parish, their associated features and policies for consideration.

Appendix 1

Responses from Residents re Airbnb/party homes policy and the short-term let letter 15/2/21

Royce Way	I haven't experienced any issues with properties being Let, however I know my friend living opposite us has, much to her frustration. However, as a household we will happily back the Board on taking this further as all the points you make are an accurate view on what could / is slowly happening everywhere. This kind of business introduces people to our vicinity that wouldn't have known much about our Estate otherwise and I personally feel uncomfortable with that .
Royce Way	As you know, we have only recently moved in to Royce Way. As yet, we have not been affected by any short-term holiday lets. However, one of the main reasons for moving to the estate was to enjoy the relative quiet and neighbourly approach to living, as outlined in your letter. We absolutely agree that short-term holiday lets could compromise this and

	<p>therefor fully support your position and next steps approach. If there is anything further that we can do to help, please feel free to ask.</p>
Royce Way	<p>I fully support the board in upholding the integrity of the estate and limiting properties to long-term rentals only. As we are not supposed to run businesses from our properties it seems to contradict what is and isn't allowed.</p> <p>Am I now allowed to run any business I like from my property with customers/clients coming and going all time of day and night and with no regard to the disruption to my neighbours?</p> <p>Recently (in-between lock down) certain properties seemed to have a constant stream of people and cars coming and going with no respect to neighbours, noise levels, speed limit, off street parking etc.</p> <p>One of the highlights of this estate is the quiet, friendly, safe nature of it – all this is in jeopardy if we have this constant stream of visitors all year round.</p>
Royce Way	<p>Whilst we thoroughly endorse what you and the committee are endeavouring to do, we cannot visualise how it can be done legally or physically (i.e. Bailiffs).</p> <p>The Covenant on our property states that “no trade or business....shall be carried out on any part of the land”. We presume a similar Covenant is in place on all Estate properties? Surely lettering for profit is not only taxable but a business use? Looking at recent examples on the Estate it is impossible, presumably, to know in advance of a buyer's intention to turn their property into a “party house” but it is not long before the presence of builders putting in swimming pools, hot tubs, etc and paving over front gardens for parking, is a good indication. Airbnb, for example, allow up to 16 people into their lets with no checks on how many households are allowed. Surely this breaks Lockdown rules – but what can be done? Presumably the Estate Committee will know the name of the ultimate owner?</p> <p>It is all very worrying. We wish you well with your endeavours.</p>
Royce Way	<p>My concern would be -</p> <p>Breaking one of the covenants of the estate by running a business on the estate.</p> <p>That people on short-term lets would not show the same respect as local residents do to the local environment. They do not share the same sense of responsibility for the locality as they are only there for a short time.</p> <p>That properties are becoming much larger (more bedrooms) and so attract a larger number of people, possibly from different households and hence more cars to the residence and imbue a party atmosphere and all that entails. People up late chatting, loud music and drinking.</p> <p>You would expect this occasionally with neighbours but with short-term lets it would be constant.</p>

Royce Close	<p>I am aware of problems experienced by neighbours from those renting an Airbnb property and the owner and fully understand the concerns expressed. As Royce Close was built later than other properties I have checked with the land registry and downloaded documents that set out the restrictive covenants. They include "No trade business or manufacture except that of a professional calling shall be carried out on any part of the land." I fully support the company should it decide to join with owners in legal action and accept that the costs of such action would be reflected in the annual charge.</p>
Royce Close	<p>This is a subject which is of great importance to all residents, as there is no doubt that if more properties became available as holiday lets it would have a very negative affect on our way of life on this estate.</p> <p>My house in Royce Close is behind and very close to XXXX in Royce Way, which became a holiday let during 2020. During one of the early weeks of occupation, during a period of hot weather, visiting teenagers were in the garden at 2 in the morning playing loud music. This stopped me sleeping, I had to close the windows on a hot night, and I was sufficiently upset to go round next morning to complain to the lady who answered the door. I was not aware at the time that she and her family were just holiday visitors, but it was completely unacceptable, and I made that clear!</p> <p>Subsequently there was a week or two during the hot weather when a continual thumping (which sounded like a ball being kicked) for several hours at a time, coming from XXXX, made it difficult to enjoy relaxing in my garden or conservatory. I found it annoying at a time when our movements were restricted and we had to remain at home. Clearly, these are the sorts of problems which do not occur when householders respect their neighbours. I have recently been told that the owners of XXXX ask their guests to stop making noise outside after 11pm. As I am now in my 80's, I find that I need to retire well before 11pm, and that time - if observed - is unacceptable on a residential estate of this nature.</p> <p>On the subject of restrictive covenants, my own property is subject to a Restrictive Covenant which stipulates that 'no trade business or manufacture except that of a professional calling shall be carried out on any part of the land'. I hope that such a covenant applies to all properties on the estate, as it is clearly intended to prevent properties being used for commercial purposes to the detriment of neighbours and the estate. Presumably if we allow properties to be used as holiday lets it may become difficult to enforce the covenant in future.</p> <p>I do hope that you feel able to take action on our behalf.</p>
Royce Close	<p>We are aware that XXXX on Royce Way was operated as a holiday let last summer/autumn. The tenants certainly caused some significant evening/night noise disturbance. We agree that it would be nice to be able to control, or at least influence, the level of noise from holiday lets. You mention that property covenants restrict the use of</p>

	Wells Farm Estate properties for commercial business purposes and that short-term rental would breach such a covenant. It seems likely that many letting owners will be taking advantage of reduced rates in respect of self-catering & holiday let accommodation. If this could be shown to be the case, it might be sufficient proof of the operation of a commercial business.
Royce Close	Thank you for your email about short-term renting. We share a boundary with xxx, Royce Way. The owners have been back and forth often recently and there is a family there now the restrictions are ignored. I did contact the owner in August about the noise and lights nuisance from renters until 2--3am. He accused me of harassment so obviously I will not contact him again. We are not happy at the thought of ongoing renting out with potentially more than a dozen people staying there. Our bedroom overlooks their garden and the hot tub is a very noisy feature. Thank you for highlighting the problem.

Elms Ride	Received and understood.
Elms Ride	Having had some experience of short-term holiday lets in Brighton, confirm we are totally opposed to them on the Estate for the valid reasons you detail. We therefore would support the Board joining with others in taking legal action or on behalf of the Estate.
Elms Ride	We are most concerned to discover the extent of changes to some properties on the Wells Farm Estate. It seems to us that the short-term lettings are in breach of the covenants governing the uses of dwelling houses and this is a significant threat and detriment to our rights to peace and quiet on the estate. The character of the estate was, we are certain, one of the main reasons for people choosing to live here and we believe the estate management's primary task is to safeguard this high value amenity. We would favour an approach that takes legal counsel and uses the law to ensure that the covenants are upheld. Advising or simply requesting change from people whose motives are primarily financial, we believe, will not on its own be fruitful. We also think that the local authorities and local MP need to be alerted to our concerns and mobilised to act on our behalf as constituents and local tax payers. We are aware that action on these matters is no easy matter and that legal representation is costly. However, we feel this will be necessary in order to engage with property owners whose interest is to engender profits and raise property values at the expense of those who live here permanently. We propose therefore that the Board consider raising a levy on all members in order to employ the appropriate legal advice and ensure action to remedy the situation. Perhaps you could let us know if such a course is open to the Board and whether such a recommendation would be binding on estate residents as members and 'owners'? We would certainly be prepared to help fund legal action in order to

	enforce the covenants in the common interest.
Elms Ride	<p>Thank you for your letter about short-term lets.</p> <p>As a second home owner on the Estate we feel we have responsibilities and a commitment to everybody living on the Wells Farm Estate and I hope that all other residents would have a similar view. This includes participating in Estate wide activities such as the autumn leaf clear up and AGM when we can.</p>
Elms Ride	<p>I like everyone else am very concerned about the possibility of frequent lets and possible rowdy behaviour. I understood that no property could be used as a business property, according to the covenant. I recall the owner of Gull Cottage made an office in his garage and had employees come daily, but this was stopped and the property sold, due to the covenant being invoked. The prime purpose of this estate is residential. I support you in all you and the committee are doing to sort this out.</p>
Elms Ride	<p>I have read the communication re short-term lets on Wells Farm Estate. I agree with the contents thereof as the attractions and ambience of being fortunate to live on this desirable Estate in West Wittering would inevitably change detrimentally if alterations and extensions to particular houses lead to short-term lets.</p>
Elms Ride	<p>Thank you for the letter about short term lets. I support the action the Board is taking and thank you all for looking after the interests of all estate residents.</p> <p>I do hope that raising awareness will help those considering regular short term letting to appreciate the characteristics that make this private estate such an attractive place in the first place and to understand how easily that could be disturbed. I hope they think again.</p> <p>Things never stand still, and the AirBnB phenomenon has changed attitudes forever: sweating your assets is often heralded as an honourable thing to do, and many residents will seek accommodation in other quiet areas themselves. Will it increasingly be seen as part of modern life?</p> <p>I therefore fear that efforts to enforce covenants may ultimately prove challenging, and perhaps prohibitively expensive in the long run.</p> <p>It is good to raise awareness. Changing trends are not reasons to stand aside, especially if worries about unneighbourly behaviour by holiday-makers do become a regular problem.</p>
Elms Ride	<p>This is an excellent message and clearly sets out the Wells Farm position on this issue, which we fully support. Sadly, for all the estates in the area this is probably just the start of a lengthy story and the more we can all move in step with all interested parties, the stronger our position will be.</p> <p>This notice struck the right tone in valuing local community and quality of life over blatant</p>

	<p>profiteering.</p>
<p>Elms Ride</p>	<p>I too am most concerned to hear that several properties on Wells Farm Estate have been purchased with the intention of using them for the very profitable purpose of short term holiday rentals.</p> <p>I have lived in Elms Ride for 41 years and strongly feel that if this is allowed to continue unchecked it will certainly change the whole character of this desirable private estate. As you say, the addition of swimming pools, barbeques, fire-pits and hot-tubs into fairly small gardens is purely to encourage large and inevitably noisy parties being held by people who do not live here for any length of time and therefore will have little concern for their neighbours. This may make me sound like a kill-joy but those who know me will know that I enjoy a party as much as anyone - but this is a different situation. Also the certain increase in parking of vehicles on the roads and verges is a problem worthy of consideration on our pleasant and well maintained estate.</p> <p>I am fully in favour of the Board collecting further evidence and seeking legal advice on this matter. I realise that this is not an easy problem to solve but feel it is essential that we maintain the Estate's character and ambiance and resist it developing into a party hub run for the financial gain of people who do not live in West Wittering. I would certainly be prepared to help fund legal action in order to enforce the property covenants in the interest of us all.</p> <p>In 1952 the residents of West Wittering were faced with the prospect of a holiday camp being built on the beach. They resisted the temptation of financial gain - buying the land and setting up the West Wittering Estates, so preserving the beach for us all. I feel people should always be welcome to come and share this wonderfully unique area in which we live but not to try and alter it for commercial gain</p>
<p>Elms Ride</p>	<p>I confirm that I am in full agreement for the board to pursue all legal avenues to prevent the future use of properties on the Wells Farm Estate being used as businesses by way of short term lets.</p> <p>I have lived on the estate for over 20 years and am very concerned over the fairly recent developments that have resulted in properties being developed by owners of second homes for short-term rentals. There is clear evidence that such homes are being converted into party houses, which is entirely against the spirit and the well being of the Estate.</p> <p>I hope that the board is successful in its attempts to prevent a proliferation of such developments. Further that the Parish and District councils are able to ensure that taxation and extra rates make such ventures uneconomical or better still legislate against them entirely.</p>

The Byeway	Thank you for this Claire. I have read the contents and support them. We have no knowledge of any such lets and have have no intention to let xxxx Cottage. Though it would be nice to be able to visit ourselves!
The Byeway	<p>We too believe that the development of a commercial holiday rental market would mark a permanent and detrimental change to Wells Farm Estate and to West Wittering as a whole.</p> <p>When Airbnb was first created it had a very commendable business model where one would let out a room to guests, welcome them into your house and show them the sights around the area.</p> <p>Over the years this has “morphed” into something completely different.</p> <p>We have read articles, and heard from close friends of instances of outrageous behaviour arising from Airbnb which no one should have to tolerate.</p> <p>We purchased XXXX for all of the good reasons that you state in your letter and we would not want this to change.</p> <p>If this is a developing trend then it needs to be curtailed before precedents are set.</p> <p>By visiting the web sites of companies like Airbnb it is possible to see the properties that are advertising themselves for this type of use.</p> <p>We believe that we have 2 such properties near to us, but as we have only recently purchased XXXX and with the advent of Covid we have not yet experienced a “normal” Summer season.</p> <p>For the avoidance of doubt, we purchased XXXX for our, and our families’ and friends’ benefits and not for short term holiday rentals.</p>
The Byeway	<p>Thanks for the email. That’s perfect.</p> <p>As you can see I sent this to the Parish council on the 11th and had a reply back from Sue who sent it to the company doing the survey.</p>
The Byeway	I object to the holiday letting beginning to develop on the Wells Farm Estate, which is not suitable for such a commercial undertaking.

Seaward Drive	<p>A well crafted document that sets out the issues in a considered manner. Well done to you and the Board.</p> <p>Not an easy matter to be taken on by the Board, but we consider you are right to take on this challenge. While, as second home owners ourselves, we are conscious we have a detrimental impact on the vibrancy of the community by not being full time occupants, we feel the use of properties for short term lets on a commercial basis substantial impinges on the amenity of the Wells Farm Estate.</p> <p>As a result, we would like to express our support for the Boards stance on the issue. Please</p>
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	<p>let us know what other support may be needed.</p>
Seaward Drive	<p>It is reassuring that the board are aware of the situation and the potential for problems in the future.</p> <p>The measures proposed by the board seem to be a pragmatic and robust approach to prevent short-term holiday lets from becoming commonplace and the issues this could cause. We are fully supportive of this approach.</p> <p>You asked for examples of where holiday lets on the Wells Farm Estate had caused issues/problems. We are aware of a holiday let property and although we are not close, it has caused some noise disturbance. However, our property does back onto Cakeham Road, where we are aware of 2 closer holiday let properties. Both of these properties have been disruptive generating late-night noise, loud music and partying well into the early hours on many occasions.</p> <p>We are appreciative of any steps that can be taken to avoid the trend for similar holiday let/party houses on Wells Farm Estate.</p>
Seaward Drive	<p>The issues of noise, traffic, disturbance and loss of community are well documented when it comes to short-term lettings across the world. They're as relevant in West Wittering as anywhere. The main issue I'm concerned about is constant, back-to-back, party-style / multi-family rentals, in properties that are reconfigured to sleep as many people as possible. I don't know anyone in any residential environment who would welcome these. Hotels, caravan parks, holiday camps and self catering developments are specifically created for higher-volume, higher-impact tourism like this (and they're subject to specific planning controls), while the vast majority of properties in West Wittering and elsewhere are not.</p> <p>Short-term letting platforms/companies are largely unregulated and unlicensed too, when other accommodation, leisure and hospitality facilities must follow all regulations in force, including paying considerable business rates to help meet the impact they bring.</p> <p>In other countries, one cannot let a property in this way without all or some of the following: Obtaining/paying for a licence; waiting for a licence to become available if only a set number are ever issued (then accepting they are rotated, or for a limited duration); getting a change-of-use planning designation; clearing fire/safety inspections; accepting a limit on the number of letting nights per year; accepting a cap on occupancy levels (nowhere close to full occupancy); and paying business rates. All of these mean buying a property specifically to run as a short-term let is commercially unviable - which stops this activity dead in its tracks. Even for those buying a second home to use themselves and to run short-term lets during the rest of the time, such restrictions would make it much less appealing.</p> <p>Commercially-run short lets are a contributing factor in increasing property prices too, especially when they cluster in particular areas, as they deplete housing stock and</p>

	<p>effectively re-designate it as commercial property. While lots of people get excited about increasing property prices, especially their own, these only benefit some members of society, and realistically then only if they plan to sell and leave an area or downsize. They do not benefit the 37% of people in the U.K. who rent, those trying to get onto the property ladder who need ever larger deposits/mortgages, or people who need to upsize. The large short-term letting platforms were not actually set up as holiday letting agencies. The clue is in the name - Airbnb, hotels.com, etc. I should state I have no issue with people running a B&B from home, or letting out an annexe or self-contained unit that's within their own property. The key difference is they are on site and are highly unlikely to put up with all the antisocial elements that come with short-term lets. This sort of thing isn't especially detrimental to a sense of community either as owner-occupiers are resident to run these activities.</p> <p>When considering measures, the only solutions found elsewhere have been when local councils have stepped in to introduce licensing / limits / business rates, recouping the full cost of this from the property owners concerned. We might also look to elsewhere in the world for guidance on when short-term lets are permitted. Unless they are keen to take part, a lot of residents leave Rio and Notting Hill during carnival, people leave Wimbledon during the Wimbledon fortnight, Ascot during Royal Ascot, and so on. Properties in such locations can command very high rentals during these periods. If it is not possible to ban short-term lettings completely, the obvious weeks to permit them will be when those renting them would actually be out anyway, for example the three main Goodwood events each year.</p>
Seaward Drive	Thank you for the message on short-term holiday letting and completely agree with the sentiment and support the efforts to stop this getting worse.
Seaward Drive	We believe this is a major issue for the area as a whole and whole-heartedly support the Board in its efforts to address this problem on the estate. Constant changeovers, houses let to capacity and dealing week after week with a new set of holiday-makers is very disturbing. The owners who are letting these houses out for large sums are not on hand to deal with the fallout their customers generate.