



# Strategic Environmental Assessment for the West Wittering Neighbourhood Plan

Environmental Report to accompany the Regulation 14  
version of the Neighbourhood Plan

West Wittering Neighbourhood Plan Steering Group

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## Quality information

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## Non-Technical Summary

### What is Strategic Environmental Assessment (SEA)?

A strategic environmental assessment has been undertaken to inform the West Wittering Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

### What is the West Wittering Neighbourhood Plan?

The West Wittering Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The West Wittering Neighbourhood Plan is being prepared in the context of the Adopted Chichester Local Plan: Key Policies (2014-2029) and the emerging Chichester Local Plan Review (2016-2035).

It is currently anticipated that the West Wittering Neighbourhood Plan will be submitted to Chichester District Council in early 2020 and undergo a referendum later in 2020.

### Purpose of this Environmental Report

This Environmental Report, which accompanies the current consultation on the West Wittering Neighbourhood Plan, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2019), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the West Wittering Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives for the West Wittering Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the West Wittering Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the West Wittering Neighbourhood Plan;
- The likely significant environmental effects of the West Wittering Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the West Wittering Neighbourhood Plan; and
- The next steps for the West Wittering Neighbourhood Plan and accompanying SEA process.

## Assessment of reasonable alternatives for the West Wittering Neighbourhood Plan

### Housing numbers to deliver through the Neighbourhood Plan

West Wittering is designated as a 'Service Village' within Policy 2 'Development Strategy and Settlement Hierarchy' of the Chichester Local Plan. The Local Plan highlights that provisions will be made for small scale housing developments consistent with the indicative housing numbers set out in Policy 5 'Parish Housing Sites 2012-2029', stated as 50 dwellings for West Wittering. However, the Site Allocations DPD prepared to help deliver the housing numbers across Chichester District confirms that this housing target has been achieved through extant planning permissions.

The preferred approach set out through Policy S5 of the Local Plan Review 'Parish Housing Requirements 2016-2035' highlights a target of 25 new dwellings to be delivered in West Wittering during the plan period. In response to this, the West Wittering Neighbourhood Plan Steering Group have been keen to consider how the 25 dwellings should be delivered through the Neighbourhood Plan. As part of this process, a call for sites process was undertaken for the parish of West Wittering.

### Assessment of reasonable alternatives for development strategies

To support the development of a spatial strategy to deliver the proposed 25 dwellings through the Neighbourhood Plan, the SEA process has considered five options for delivering this requirement. The options, which comprise different combinations of the four sites identified as suitable and available through the call for sites process and the HELAA, are as follows:

- **Option 1:** Delivery of the housing number through a single allocation on Site 8 'Land at Church Road (Site 3)'
- **Option 2:** Delivery of the housing number through a single allocation on Site 2 'Walnut Tree Caravan Site'
- **Option 3:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 8 'Land at Church Road (Site 3)'
- **Option 4:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site'
- **Option 5:** Delivery of the housing number through a combination of allocations at Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Lodge'

In summary, the assessment has highlighted that delivering the Neighbourhood Plan area's housing requirement through Option 2 and Option 4 has increased potential to have significant impacts to European and nationally designated sites for biodiversity and nationally protected landscapes. Specifically, the options would likely increase the recreational pressures to the Chichester and Langstone Harbours Ramsar Site and SPA and the Chichester Harbour SSSI, with the scale of proposals also likely to negatively impact upon the special qualities of the Chichester Harbour AONB. However, these options perform relatively favourably in relation to the 'Land, Soil and Water Resources' and 'Historic Environment' SEA themes, locating development away from designated heritage assets and potentially facilitating the most efficient use of land through the redevelopment of the brownfield area in Site 2 'Walnut Tree Caravan Site'.

Comparatively, Option 1, Option 3 and Option 5 have the potential to deliver the greatest benefits in relation to the 'Population and Community' and 'Transportation' SEA themes, particularly in terms of access to services and facilities and encouraging more sustainable methods of travel for undertaking some day to day activities within the Neighbourhood Plan area. Nonetheless, this assessment has highlighted that these options have an increased potential to have significant impacts to nationally designated heritage features and water resources. Specifically, the options could impact upon the setting of the Grade II listed "The Thatched Tavern" and the integrity of local drainage ditches which are identified in the FLOW study as a key component of the East Wittering drainage system.

## Assessment of reasonable alternatives for the use of housing in the Neighbourhood Plan area

Following consultation with the local community, a further element in which the Neighbourhood Plan Steering Group was keen to explore was the issue of permanent and second homes and holiday letting. To consider this issue in more detail, and provide further sustainability context, the SEA process has appraised two options, as follows:

- **Option 1:** Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership in the Neighbourhood Plan area through introducing restrictions on the use of new housing; and
- **Option 2:** Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

## Current approach taken forward through the Neighbourhood Plan

Following the consideration of the assessment of reasonable alternatives for development options, Option 1 has been taken forward through the Neighbourhood Plan which seeks to deliver the housing target of 25 dwellings through a single allocation on Site 8 'Land at Church Road (Site 3)'. This site is identified in the HELAA as being suitable for the development of up to 230 homes, and therefore only a limited section of the site will be required to deliver the housing target (approximately 1ha). The Neighbourhood Plan notes that the proposed allocation on the site will seek to:

- Minimise the landscape impact of the proposed allocation through siting the development in the southern section of the site. This limitation will, therefore, also minimise the impact of the allocation on the Grade II listed 'The Thatched Tavern' to the north east of the site; and
- Incorporate the drainage ditch on the site as part of a landscape buffer to ensure its biodiversity and flood prevention functions are secured as part of the development.

Following the consideration of the assessment of reasonable alternatives for the use of housing in the Neighbourhood Plan area, the current version of the Neighbourhood Plan places a condition on open market housing that the houses should be occupied as a principal residence. This is given the proportion of second or holiday homes has recently increased (reflecting increased demand for such properties), and the perception that this is having a significant impact on the ability of residents, their relatives and those with other local connections to rent or buy in the parish. This proposed approach has also been supported through consultation events undertaken for the Neighbourhood Plan to date.

## Assessment of the Regulation 14 version of the West Wittering Neighbourhood Plan

To support the implementation of the vision statement for the Neighbourhood Plan, the Regulation 14 consultation version of the West Wittering Neighbourhood Plan puts forward 14 policies to guide new development within the Neighbourhood Plan area, along with eight community aspirations to help achieve the vision of the Plan.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA themes:

- Biodiversity and Geodiversity;
- Climate Change;
- Landscape;
- Historic Environment;
- Land, Soil and Water Resources
- Population and Community;
- Health and Wellbeing; and
- Transportation.

The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. This relates to the focus of the Neighbourhood Plan on safeguarding and enhancing community infrastructure, facilitating the delivery of housing which meets local needs and through supporting economic vitality by enhancing the prospects for employment locally. The Neighbourhood Plan is also likely to lead to

significant positive effects in relation to the 'Health and Wellbeing' SEA theme, linked to its promotion of improved and accessible network of footpaths, enhancements to green infrastructure networks and safeguarding open space provision to encourage active lifestyles.

The Neighbourhood Plan will also bring positive effects in relation to the 'Landscape' and 'Historic Environment' SEA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the special qualities of the AONB, supporting the quality of the public realm, and through incorporating high-quality and sensitive design through new development proposals. Additionally, the Neighbourhood Plan will bring positive effects in relation to the 'Biodiversity' SEA theme through retaining habitats, enhancing ecological networks and delivering net gain. However, given the approaches taken forward through the Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall.

Regarding the 'Climate Change' SEA theme, the Neighbourhood Plan will potentially lead to positive effects through policies and community aspirations which seek to address the climate crisis. However, this is dependent on the extent to which proposals incorporate mitigation and adaptation measures through design, along with the level of available funding and community support for such projects.

The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' SEA theme, given its focus on reducing traffic congestion, supporting modal shift towards sustainable transport options and by ensuring that new developments are accessible and provide appropriate access to local services and facilities. In relation to the 'Land, Soil and Water Resources' SEA theme, the Neighbourhood Plan will lead to the loss of relatively limited areas of land classified as the best and most versatile agricultural land. Otherwise, in relation to this SEA theme, the Neighbourhood Plan will initiate several beneficial approaches through the implementation of provisions which seek to maintain and enhance the quality of the waterways, drainage ditches and coastline of the parish. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

## Next steps

This Environmental Report accompanies the West Wittering Neighbourhood Plan for Regulation 14 consultation.

Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, and the Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Chichester District Council, for subsequent Independent Examination.

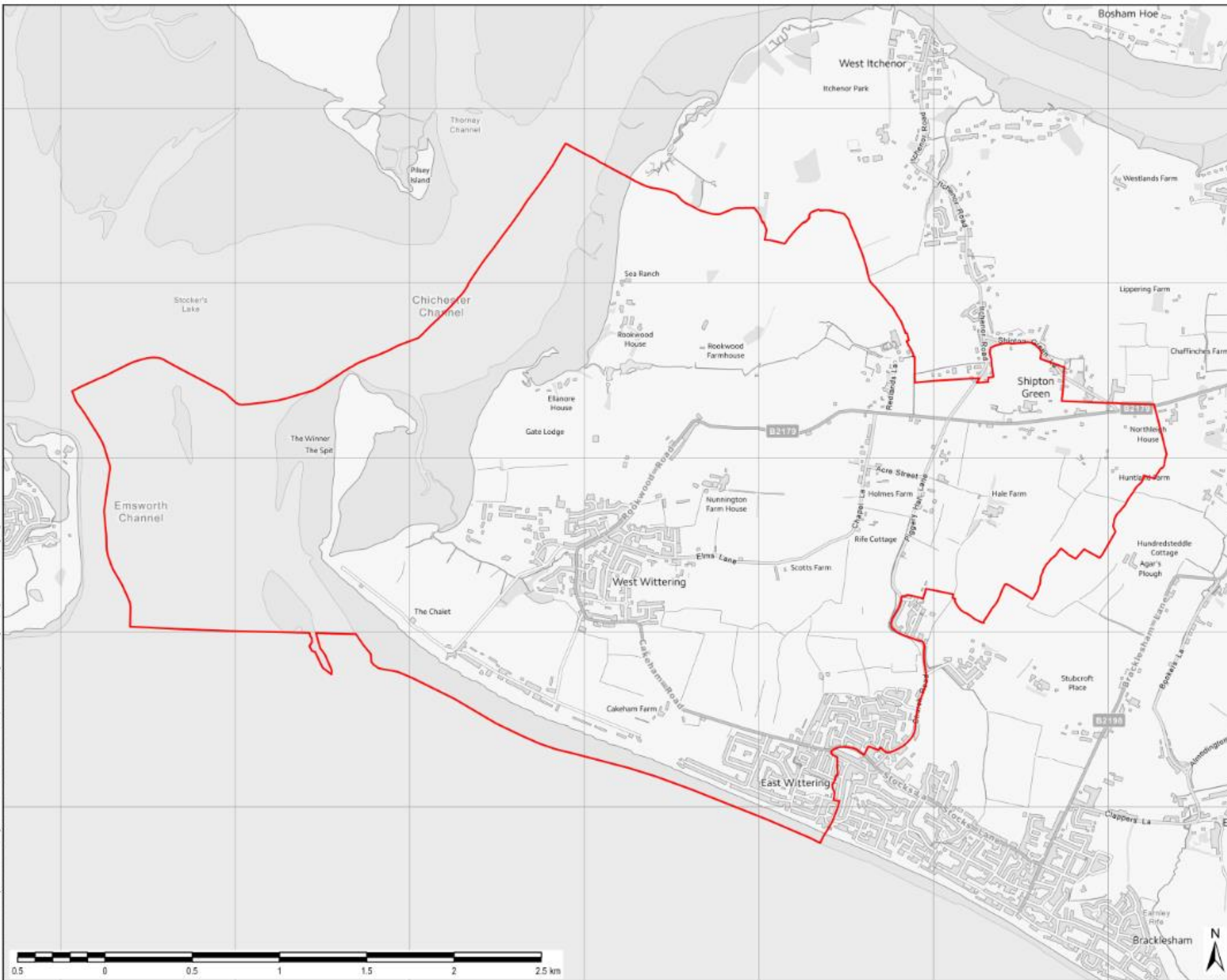
At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, West Wittering Neighbourhood Plan will be subject to a referendum, organised by Chichester District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, West Wittering Neighbourhood Plan will become part of the Development Plan for the parish.



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**LEGEND**

West Wittering Neighbourhood Plan Area

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Purpose of Issue  
**FINAL**

Client  
**WEST WITTERING NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title  
**STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE WEST WITTERING NEIGHBOURHOOD PLAN**

Drawing Title  
**WEST WITTERING NEIGHBOURHOOD PLAN AREA**

Drawn CH	Checked JW	Approved RJR	Date 09/04/2019
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**FIGURE 1.1**

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# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of West Wittering's emerging Neighbourhood Plan.
- 1.2 The West Wittering Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The West Wittering Neighbourhood Plan is being prepared in the context of the Adopted Chichester Local Plan: Key Policies (2014-2029), with due regard given to the emerging Chichester Local Plan Review (2016-2035).
- 1.3 It is currently anticipated that the West Wittering Neighbourhood Plan will be submitted to Chichester District Council in early 2020 and undergo a referendum later in 2020.
- 1.4 Key information relating to the West Wittering Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the West Wittering Neighbourhood Plan**

Name of Responsible Authority	West Wittering Parish Council
Title of Plan	West Wittering Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The West Wittering Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Adopted Chichester Local Plan: Key Policies (2014-2029), with due regard given to the emerging Chichester Local Plan Review (2016-2035).</p> <p>The West Wittering Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2035
Area covered by the plan	The West Wittering Neighbourhood Plan area covers the parish of West Wittering in West Sussex (Figure 1.1).
Summary of content	The West Wittering Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Joanne Brown, West Wittering Parish Council Email address: <a href="mailto:clerk@westwitteringparishcouncil.gov.uk">clerk@westwitteringparishcouncil.gov.uk</a>

## SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the West Wittering Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The West Wittering Neighbourhood Plan has been screened in by Chichester District Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
  1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
  2. A report (the 'Environmental Report') is published for alongside the Draft Plan (i.e. the Regulation 14 version of the West Wittering Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

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<sup>1</sup> Directive 2001/42/EC

## Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for West Wittering Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory<sup>2</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>3</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level.</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
<b>What's the scope of the SEA?</b> What is the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment.</li> </ul>
<b>What has plan-making/SEA involved up to this point?</b>	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach).</li> <li>The likely significant effects associated with <b>alternatives</b>.</li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
<b>What are the assessment findings at this stage?</b>	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the Regulation 14 version of the plan</b>.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the Regulation 14 version of the plan</b>.</li> </ul>
<b>What happens next?</b>	<ul style="list-style-type: none"> <li>The next steps for plan making / SEA process.</li> </ul>

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. Local Plan context and vision for the West Wittering Neighbourhood Plan

### Local Plan context for the Neighbourhood Plan

- 2.1 The West Wittering Neighbourhood Plan is being prepared in the context of the 'Chichester Local Plan: Key Policies 2014-2029'<sup>4</sup> (adopted in July 2015), with due regard given to the emerging Local Plan Review. The Local Plan provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Chichester District.
- 2.2 In the context of the Neighbourhood Plan area, West Wittering is designated as a 'Service Village' within Policy 2 'Development Strategy and Settlement Hierarchy' of the Local Plan. Outside of Chichester city and the four Settlement Hubs of East Wittering / Bracklesham, Selsey, Southbourne and Tangmere, Policy 2 states that the Service Villages will be the focus of new development and facilities. Provisions will be made for the following:
- Small scale housing developments consistent with the indicative housing numbers set out in Policy 5 'Parish Housing Sites 2012-2029', stated as 50 dwellings for West Wittering;
  - Local community facilities, including village shops that meet identified needs within the village, neighbouring villages and surrounding smaller communities, which will help make the settlement more self-sufficient; and
  - Small scale employment, tourism and leisure proposals.
- 2.3 A 'Site Allocations Development Plan Document' (DPD) was prepared to help deliver the housing and employment numbers within the Local Plan. Table 1.1 within the DPD confirms that the housing target of 50 dwellings will be achieved through extant planning permissions. Therefore, the DPD does not propose any additional allocations within the Neighbourhood Plan area.<sup>5</sup>
- 2.4 Neighbourhood plans will form part of the development plan for Chichester, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Chichester, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.5 Chichester District Council are in the process of undertaking a review of the Local Plan. The Preferred Approach version of the Chichester Local Plan Review<sup>6</sup> (2016-2035) was published for Regulation 18 Consultation between December 2018 and February 2019. Within the emerging Local Plan, Policy S2 'Settlement Hierarchy' also lists West Wittering as a 'Service Village', with Policy S5 'Parish Housing Requirements 2016-2035' highlighting a target for 25 new dwellings to be delivered over the lifetime of the Plan. However, Policy S6 'Affordable Housing' goes on to state that Neighbourhood Plans can set out higher requirements for affordable housing provision where local evidence of need and viability support this.

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<sup>4</sup> Chichester District Council (2014): 'Adopted Chichester Local Plan: Key Policies 2014-2029', [online] available to download via: <<http://chichester.gov.uk/newlocalplan>> last accessed [15/04/19]

<sup>5</sup> Chichester District Council (2019): 'Site Allocation DPD 2014-2029', [online] available to download via: <<http://chichester.gov.uk/siteallocation>> last accessed [15/04/19]

<sup>6</sup> Chichester District Council (2019): 'Chichester Local Plan Review: Preferred Approach (2016-2035)', [online] available to access via: <<http://chichester.gov.uk/article/30923/Preferred-approach---consultation-December-2018>> last accessed [15/04/19]

## Vision, aims and objectives for the Neighbourhood Plan

2.6 Prepared in the earlier stages of plan development, the draft vision statement for the West Wittering Neighbourhood Plan is as follows:

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*West Wittering will remain a beautiful, tranquil and biodiverse part of the Manhood Peninsula through to 2035, retaining its character while promoting sympathetic developments meeting local needs. Residents and visitors to the village will benefit from a thriving economy, improved transport and infrastructure together with a better quality of life. West Wittering beach will remain an outstanding, environmentally-friendly beach.*

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### Vision Statement for the West Wittering Neighbourhood Plan



2.7 To accompany the draft vision statement, the Neighbourhood Plan outlines 14 objectives which have been grouped under the following six themes:

#### 2.8 Assets and Treasures

- To enhance and preserve the distinct character areas, designated areas and green spaces in the village.
- To provide for a sustainable future for heritage assets and green spaces in the village by ensuring new development preserves and enhances them.
- To use the Village Design Statement to provide guidance for new developments in the parish.

#### 2.9 Biodiversity

- To accommodate appropriate development and change without undermining the area's rich flora and fauna, the natural beauty and visual amenity of the landscape and its special character.
- To maintain riparian ditches and waterways including mitigation against impact from new development.
- To promote measures to reduce traffic, air, noise and light pollution.

#### 2.10 Local Economy

- To support and encourage existing local businesses to thrive all year round.
- To encourage small scale and appropriate new business start-up.
- To promote and develop a sustainable local economy with local employment opportunities.

#### 2.11 Housing

- To provide small scale affordable housing in perpetuity for local people.
- To provide suitable housing for downsizing to enable local young people and families, as well as local older people, to remain in the village.
- To support the delivery of affordable housing through community led housing schemes such as a Community Land Trust.

## 2.12 Transport

- To promote and support transport initiatives which provide alternatives to the use of the private car.

## 2.13 Facilities

- To maintain and enhance existing village community facilities.
- To maintain and improve sporting, cultural and recreational facilities.



## 3. What is the scope of the SEA?

### SEA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>7</sup> These authorities were consulted on the scope of the West Wittering Neighbourhood Plan SEA in May 2019.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

**Table 3.1: Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b>	
<i>Nathan Burns, Focus Area Adviser (email response received on 6<sup>th</sup> June 2019)</i>	
Natural England does not have any specific comments on the SEA Scoping Report for the West Wittering Neighbourhood Plan.	Comment noted. The recommended guidance has provided an essential reference point during the SEA process.
We would also refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.	
<b>Environment Agency</b>	
<i>Hannah Hyland (email response received on 22<sup>nd</sup> May 2019)</i>	
Thank you for your consultation on the SEA Scoping Report for the West Wittering Neighbourhood Plan.	Comment noted.
The Environment Agency is a statutory consultee for Strategic Environmental Assessments and provides advice to Local Planning Authorities on the scope and findings of the SEA. We have reviewed your Scoping Report and support the inclusion of the specific objectives under topics of Biodiversity and Geodiversity, Climate Change, and Land, Soil and Water Resources which address issues in our remit in our remit.	

<sup>7</sup> In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme.’

Consultation response	How the response was considered and addressed
Attached is the Neighbourhood Plan Checklist we have produced for Neighbourhood Plans in Chichester District Council area which you may find useful in progressing the SEA.	Comment noted. The recommended guidance has provided an essential reference point during the SEA process.
<b>Historic England</b> <i>No response received</i>	

- 3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

## Key Sustainability Issues

### Air Quality

- There are no AQMAs within the Neighbourhood Plan area. However, the ASR notes that the road network within the district is vulnerable to air pollution issues associated with congestion.
- The ASR confirms that there are three AQMAs within Chichester district, all of which are within the city of Chichester, approximately 11km to the north of the Neighbourhood Plan area.
- Emissions associated with road transport (primarily NO<sub>2</sub>) are the main pollutant of concern.
- There are three European designated sites within and surrounding the Neighbourhood Plan area which are sensitive to air pollution issues associated with traffic emissions. This is further considered under the 'biodiversity and geodiversity' SEA theme'.
- Given air quality issues are primarily linked to potential effects on European designated sites for biodiversity, and not human factors, **the air quality theme has been scoped out for the purposes of the SEA process.**

### Biodiversity and Geodiversity

- There are three European designated sites located within and surrounding the Neighbourhood Plan area, including the Chichester and Langstone Harbours Ramsar Site and SPA, and the Solent Maritime SAC.
- The integrity of the European designated sites located within and surrounding the Neighbourhood Plan area are threatened by a variety of factors, including (but not limited to): air quality issues, water quality issues, coastal squeeze, loss of functionally linked supporting habitats for birds, and recreational pressures.
- There are two nationally designated sites within the Neighbourhood Plan area, including Bracklesham Bay SSSI and Chichester Harbour SSSI. The whole of the Neighbourhood Plan area overlaps with a SSSI IRZ for residential, rural residential and rural non-residential development types.
- At the local level, West Wittering Beach SNCI, Redlands Meadow SNCI, Sandy Point LNR, Nutbourne Marshes LNR and Pilsey Island LNR are also located within or within proximity to the Neighbourhood Plan area, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC).
- There are a variety of BAP Priority Habitats located within and/or adjacent to the Neighbourhood Plan area, primarily located within the marine environment.
- Along with the 12km of hedgerows, the 255 ditches and waterways surveyed within the FLOW study contribute to local ecological networks within the Neighbourhood Plan area.

### Climate Change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in West Wittering.

- Chichester has seen a 33.7% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for West Sussex (36.6%), the South East of England (36.7%) and England (37.6%).
- The SFRA for Chichester highlights that there are areas within West Wittering located in Flood Zone 3a, which have a high flood risk potential.
- West Wittering is a 'Wet Spot' area, with an estimated 56 properties at risk from surface water and coastal flooding, rising to an estimated 170 properties at risk in the next 100 years.
- Surface water flooding is an issue for parts of West Wittering, with areas of medium-to-high risk along Coastguard Lane and Rookwood Lane where streams run parallel to the road.
- The results of the FLOW study indicate that there are a variety of opportunities to improve flood relief and water storage within the 'Sheepwash Lane' drainage system.

## Landscape

- The western section of the Neighbourhood Plan area overlaps with the Chichester Harbour AONB, a nationally protected landscape comprising of ten special qualities documented within the 2014-2019 Management Plan.
- The Neighbourhood Plan area overlaps with the 'South Coast Shoreline LCA' and the 'Chichester Harbour LCA', with a variety of landscape sensitivity issues identified for each LCA within land management guidelines prepared alongside the assessment for West Sussex.
- There are six Settlement Pattern Character Areas within the Neighbourhood Plan area as documented within the West Wittering Village Design Statement.
- Chichester District Council have allocated several Tree Preservation Orders in the Neighbourhood Plan area in the interest of their amenity value.
- The views across the Neighbourhood Plan area are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

## Historic Environment

- The Neighbourhood Plan area has a rich historic environment, including a variety of nationally designated heritage assets which are located within the parish, namely: 27 Grade II listed buildings, one Grade I listed building, one Grade II\* listed building and the Cakeham Manor (uninhabited parts) scheduled monument.
- It is currently not possible to determine whether the Grade II listed buildings within the Neighbourhood Plan area are 'at risk'.
- Designated in September 2006, the West Wittering Conservation Area is classified into four distinct character areas. The Character Area Appraisal outlines several significant features and management proposals to protect and enhance its special qualities,
- The HER for West Sussex contains 45 records within West Wittering Parish including a variety of Neolithic sites, Roman artefacts, medieval and post-medieval field systems, Bronze Age and Palaeolithic finds, and four locally distinctive buildings.

## Land, Soil and Water Resources

- In terms of the location of the 'best and most versatile' agricultural land, there is a small area of Grade 3a land within East Wittering village.
- There is a lack of evidence to ascertain agricultural land quality for the whole of the Neighbourhood Plan area. National provisional quality datasets indicate Grade 2 and 3 land, and as part of a precautionary approach it is noted that there is the potential for loss of 'best and most versatile' agricultural land.
- There is a network of small streams and ditches which pass through West Wittering,
- The overall ecological quality for the Chichester Harbour is 'moderate'. The reasons for not achieving good status are primarily attributed to the following activities: sewage discharge, poor nutrient management and coastal background dissolved inorganic nitrogen.

- The Neighbourhood Plan area is within the 'Broad Rifer to Chichester Harbour' Surface Water Nitrate Vulnerable Zone.

## Population and Community

- The population of the Neighbourhood Plan area increased at a lower percentage between 2001 and 2011 in comparison to the regional and national trends.
- West Wittering has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the parish's sense of identity.
- Over 50% of residents within the Neighbourhood Plan area are within the 60+ age category, with fewer residents within the younger age categories (0-16 and 16-24) in West Wittering in comparison to the regional and national trends.
- Second home ownership is prevalent within the Neighbourhood Plan area.
- LSOA 'Chichester 013E', which covers West Wittering village, is within the top 20% most deprived decile for the 'barriers to housing and services' IMD domain.

## Health and Wellbeing

- 77.9% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', which is lower than the totals for Chichester (82.6%), the South East (83.6%) and England (81.4%).
- The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is higher than the regional and national trends.
- The 2018 Public Health Profile for Chichester states that the rate of people killed or seriously injured on roads in the district is worse than average.
- The JSNA highlights that annual changes in the 65+ population averaged +2,500 per year between 2002 and 2017, projecting averages of +4,800 per year between 2017 and 2032.

## Transportation

- 83.9% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for the South East (81.4%) and England (74.0%) but broadly aligns to the total for Chichester (84.6%).
- A higher percentage of economically active residents in the Neighbourhood Plan area choose to work from home in comparison to the regional and national trends.
- The total percentage of the working population in the Neighbourhood Plan area choosing to walk or catch a bus, coach or minibus to work (6.6%) is lower than the total for Chichester (10.0%), the South East (10.4%) and England (12.0%).
- The primary route into West Wittering via car (the B2179) is particularly sensitive to congestion issues during peak times of year (i.e. holiday seasons) and at weekends.
- There are no railway stations within West Wittering. The nearest mainline railway station connecting residents to the national network is in Chichester, located approximately 11km to the north of the Neighbourhood Plan area.

## SEA Framework

3.5 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the submission version of the West Wittering Neighbourhood Plan will be assessed consistently using the framework.

SEA Objective	Assessment questions
<b>Biodiversity and Geodiversity</b>	
Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of the European designated sites located within and/or adjacent to the Neighbourhood Plan area?</li> <li>• Support the status of the nationally and locally designated sites within and/or adjacent to the Neighbourhood Plan area?</li> <li>• Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
<b>Climate change</b>	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>

<b>Landscape</b>	
Protect and enhance the character and quality of landscapes and villagescapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the natural beauty and special qualities of the Chichester Harbour AONB, in line with the Management Plan?</li> <li>• Conserve and enhance locally important landscape and villagescape features within the Neighbourhood Plan area as defined by the two LCAs and six Settlement Pattern Character Areas?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>
<b>Historic Environment</b>	
Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the West Sussex HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> <li>• Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?</li> </ul>
<b>Land, Soil and Water Resources</b>	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land?</li> <li>• Protect the integrity of mineral safeguarding areas?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Protect surface water resources?</li> </ul>

## Population and Community

<p>Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing residents?</li> <li>• Improve the availability and accessibility of key local facilities?</li> </ul>
<p>Reduce deprivation and promote a more inclusive and self-contained community.</p>	
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> <li>• Support a reduction in the proportion of second homes?</li> </ul>

## Health and Wellbeing

<p>Improve the health and wellbeing residents within the Neighbourhood Plan area.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Address the key challenges identified in the JSNA for West Sussex?</li> <li>• Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards?</li> <li>• Protect and enhance access to nature via greenspace and footpaths?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul>
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## Transportation

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Promote sustainable transport use and reduce the need to travel.

Will the option/proposal help to...

- Support the key objectives within the Local Transport Plan for West Sussex?
  - Reduce the need to travel through sustainable patterns of land use and development?
  - Enable sustainable transport infrastructure enhancements?
  - Facilitate working from home and remote working?
  - Improve road safety?
  - Reduce the impact on residents from the road network?
-



## 4. What has plan making / SEA involved up to this point?

### Introduction

- 4.1 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the West Wittering Neighbourhood Plan. The SEA Regulations<sup>8</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the West Wittering Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

### Overview of plan making / SEA work undertaken since 2016

- 4.5 Through consultations and engagement activities with the local community and stakeholders, the West Wittering Neighbourhood Plan Steering Group identified five main areas which to focus the development of the plan, as described in Chapter 2.
- 4.6 Throughout the process, the Steering Group have engaged with the community and local stakeholders through questionnaires, workshops, club/group presentations and public consultations. This has informed the plan's development process alongside the evidence base studies that have been undertaken.

### Housing numbers to deliver through the Neighbourhood Plan

- 4.7 As discussed in Chapter 2, the West Wittering Neighbourhood Plan has been prepared in conjunction with the provisions of the 'Chichester Local Plan: Key Policies 2014-2029' (adopted in July 2015), with due regard given to the emerging Chichester Local Plan Review.
- 4.8 West Wittering is designated as a 'Service Village' within Policy 2 'Development Strategy and Settlement Hierarchy' of the Local Plan. The Local Plan highlights that provisions will be made for the small scale housing developments consistent with the indicative housing numbers set out in Policy 5 'Parish Housing Sites 2012-2029', stated as 50 dwellings for West Wittering. However, the Site Allocations DPD prepared to help deliver the housing numbers across Chichester District confirms that this housing target has already been achieved through extant planning permissions.
- 4.9 The preferred approach set out through Policy S5 of the Local Plan Review 'Parish Housing Requirements 2016-2035' highlights a target of 25 new dwellings to be delivered in West Wittering during the plan period. In response to this, the West Wittering Neighbourhood Plan Steering Group were keen to consider how the 25 dwellings should be delivered through the

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<sup>8</sup> Environmental Assessment of Plans and Programmes Regulations 2004

Neighbourhood Plan. As part of this process, a call for sites process was undertaken for the parish of West Wittering, further discussed below.

## Assessment of reasonable alternatives for development strategies

- 4.10 One of the main aims of the West Wittering Neighbourhood Plan is to provide small scale affordable housing in perpetuity for local people. The Steering Group are keen therefore to consider sites for allocation with a capacity of six or more dwellings, or where landowners are willing to put forward affordable homes as part of the development.
- 4.11 This aligns with Local Plan Policy 34 'Affordable Housing' which indicates that financial contributions for affordable dwellings in rural areas (which includes West Wittering) will be sought by the Council on sites which would deliver between six to ten dwellings. Policy 34 also states that affordable housing should be provided on site for all sites which would deliver eleven or more dwellings.
- 4.12 A total of eight sites were initially brought forward through a 'call for sites' process completed by the Neighbourhood Plan Steering Group, shown below in **Table 4.1**. This included three sites from the Housing and Economic Land Availability Assessment (HELAA)<sup>9</sup> completed in 2018 for the Local Plan review process. In addition, a further site, 'Land at Eli's Lodge' (HELAA reference: HWW0004), which did not come forward through the Neighbourhood Group's 'call for sites' process, but was identified by the HELAA potentially being suitable, available and achievable during the plan period. This is discussed further below.

**Table 4.1: Sites identified through the 'call for sites' process and the HELAA**

Site No.	Name of site, address	Size (Ha)	Proposed dwellings for site	Site taken forward for reasonable alternatives?
1	Land west of Northfields, Summerfield Rd, West Wittering	0.41	13-15 units	<b>Yes</b>
2	Walnut Tree Caravan Site, Rookwood Road / Ellanore Lane, West Wittering	16.00	Many	<b>Yes</b>
3	Rooksfield, Piggery Hall Lane	0.69	3 units	No (no. of dwellings)
4	Bramber Nursery, Chichester Road	1.00	3 units	No (no. of dwellings)
5	Land at Elms Lane, Elms Lane	1.00	N/A (burial ground)	No (burial ground)
6	Land at Rookwood Road, Rookwood Road	0.50	10-12 units	No (CLT)
7	Land at Shipton Green, Shipton Green	0.36	1-3 units	No (no. of dwellings)
8	Land at Church Road (Site 3), Chaucer Drive	12.05	Many	<b>Yes</b>
9	Land at Eli's Lodge	0.65	14 units	<b>Yes</b>

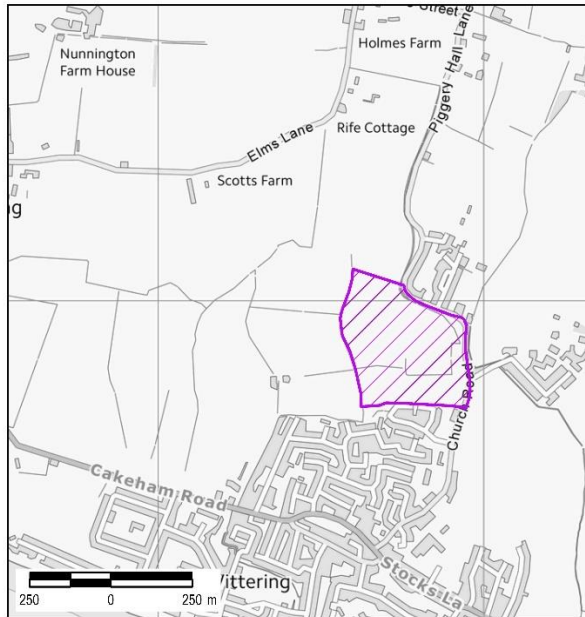
- 4.13 In the context of the above, five of the nine sites brought forward through the call for sites process and the HELAA were discounted due to the following reasons:
- Site 5 'Land at Elms Lane' is being proposed as a burial ground by the landowner and is therefore not available to be considered for housing.
  - Site 6 'Land at Rookwood Road' has been put forward by the Churches Land Trust for approximately 15 affordable dwellings for people with a local connection to West Wittering. They have agreed that a Community Land Trust (CLT) could potentially take forward development on the site in the longer term.

<sup>9</sup> Chichester District Council (2018): 'Housing and Economic Land Availability Assessment', [online] available to access via: <https://www.chichester.gov.uk/article/29759/Housing-and-Economic-Land-Availability-Assessment> last accessed [11/10/19]

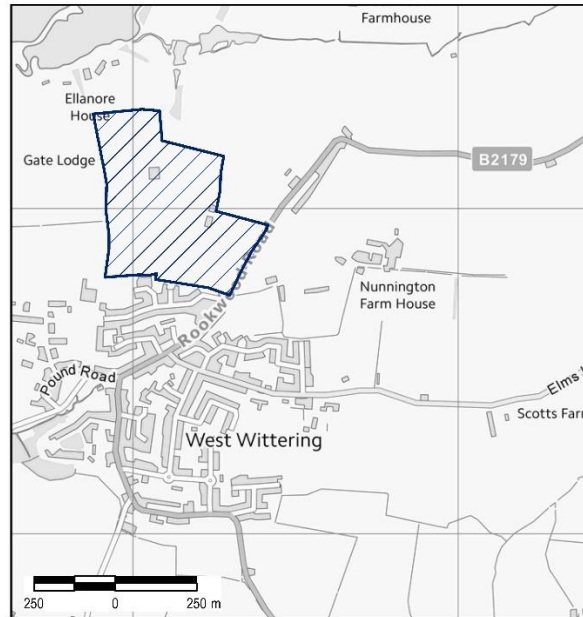
- Site 3 'Rooksfield', Site 4 'Bramber Nursery' (HELAA reference: HWW0009) and Site 7 'Land at Shipton Green' are too small to meet the required threshold of six dwellings to facilitate affordable dwellings.
- 4.14 Therefore, Site 1 'Land west of Northfields' (HELAA reference: HWW0008), Site 2 'Walnut Tree Caravan Site', Site 8 'Land at Church Road (Site 3)' (HELAA reference: HWW0002) and Site 9 'Land at Eli's Lodge' (HELAA reference: HWW0004) comprise the component parts of spatial strategy options for reasonable alternatives which consider different ways of delivering the 25 dwellings.
- 4.15 To support the development of a spatial strategy to deliver the proposed 25 dwellings through the Neighbourhood Plan, the SEA process has considered five options for delivering this requirement. The options, which comprise different combinations of the four sites identified as suitable and available through the call for sites process, are as follows:
- **Option 1:** Delivery of the housing number through a single allocation on Site 8 'Land at Church Road (Site 3)';
  - **Option 2:** Delivery of the housing number through a single allocation on Site 2 'Walnut Tree Caravan Site';
  - **Option 3:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 8 'Land at Church Road (Site 3)';
  - **Option 4:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site'; and
  - **Option 5:** Delivery of the housing number through a combination of allocations at Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Lodge'.<sup>10</sup>
- 4.16 **Figure 4.1** (overleaf) visually represents these five options, with the subsequent table presenting the findings of the appraisal of the five options outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme (**Table 4.2** overleaf). It is anticipated that this will provide the reader with a likely indication of the relative sustainability merits of the options in relation to each SEA theme considered.

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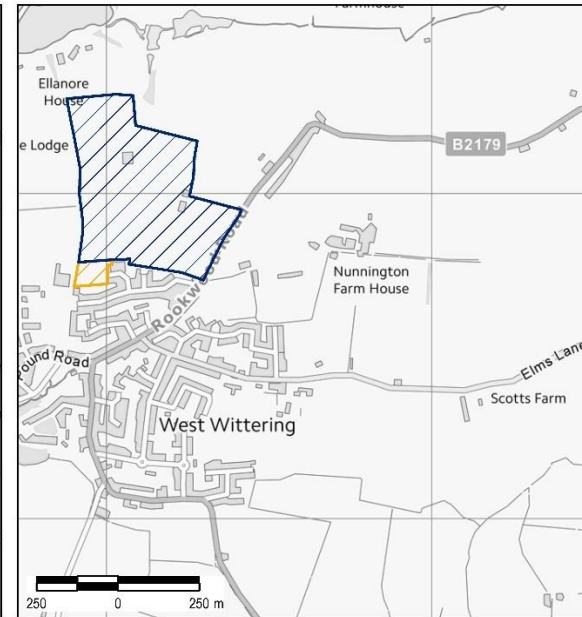
<sup>10</sup> Site 9 'Land at Eli's Lodge' came forward through the Local Plan's HELAA in 2018 which was subsequent to the Neighbourhood Group's 'call for sites' process and the appraisal of Options 1-4 outlined above. As the HELAA identifies Site 9 as potentially suitable, available and achievable during the plan period, an additional option (Option 5) was added into the appraisal of reasonable alternatives for development strategies to incorporate the site. As the indicative capacity for Site 9 is identified as 14 dwellings, it was necessary to consider an additional option which considered delivering the housing on Site 9 in combination with another. Following the appraisal of Options 1-4, which determined that options including Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' were less favourable in SEA terms (largely due to landscape and ecological considerations), the decision was taken to focus an additional option in combination with Site 8 'Land at Church Road (Site 3)' in this regard.



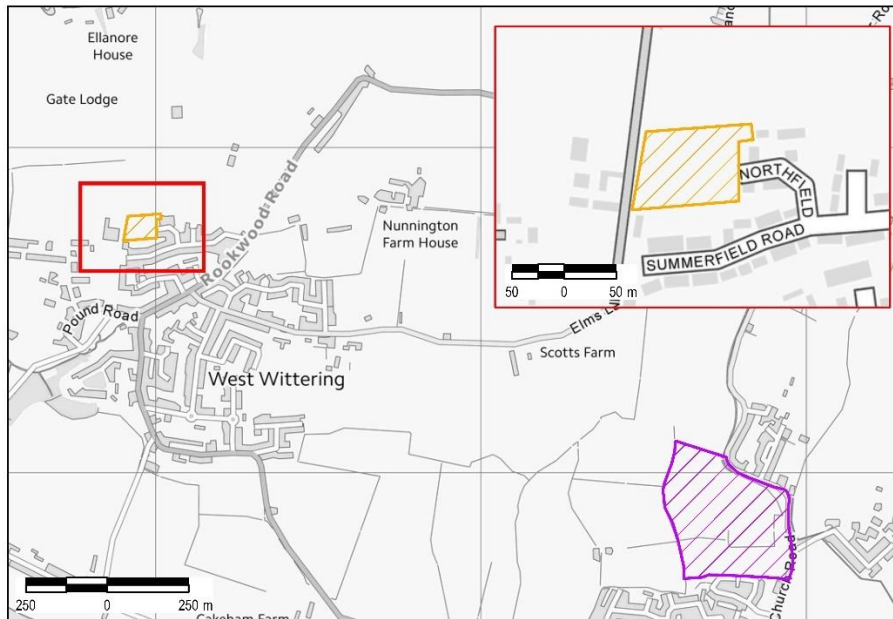
Option 1



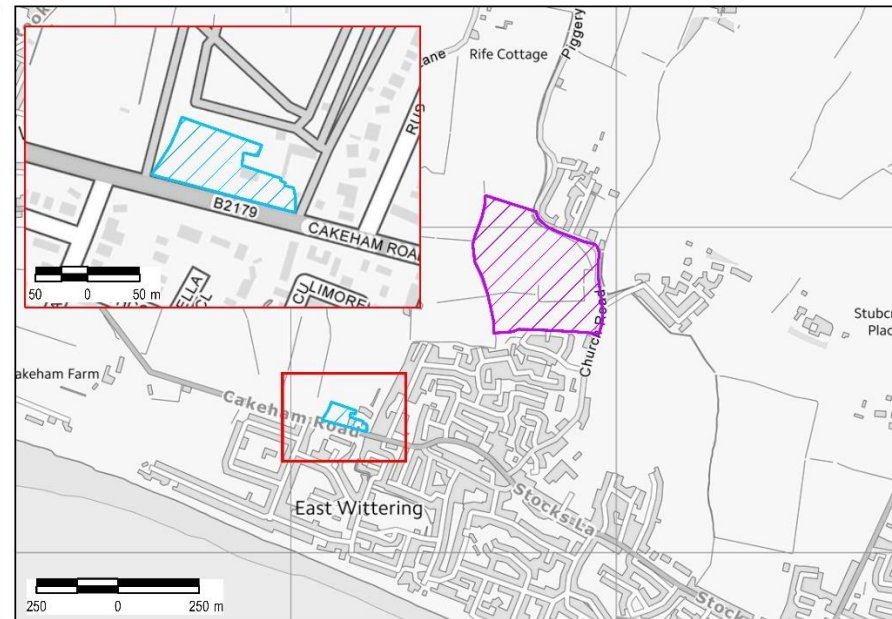
Option 2



Option 4



Option 3



Option 5

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**LEGEND**

- Site 1: Land west of Northfields
- Site 2: Walnut Tree Caravan Site
- Site 8: Land at Church Road (Site 3)
- Site 9: Land at Eli's Lodge

*N.B. The site boundaries shown denote the total extent of the sites, and not necessarily the total area potentially to be developed under each option*

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Purpose of Issue		FINAL	
Client WEST WITTERING NEIGHBOURHOOD PLAN STEERING GROUP			
Project Title STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE WEST WITTERING NEIGHBOURHOOD PLAN			
Drawing Title CONSIDERATION OF REASONABLE ALTERNATIVES THROUGH THE SEA PROCESS			
Drawn CN	Checked JW	Approved RP	Date 06/11/2019
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AECOM Mission Advancing the World's Progress 10000 Wilshire Blvd Suite 1000 Los Angeles, CA 90024-3209 Tel: (310) 556-3100 www.aecom.com			<b>AECOM</b>
Drawing Name <b>FIGURE 4.1</b>			Page <b>01</b>

File Name: I:\0104 - Information Systems\60571087 - Neighbourhood Plan - CRB\_2018\_202202 - Maps\West Wittering NP Steering Group\Figure 4.1 - Site Options.mxd



**Table 4.2: Appraisal findings: reasonable alternatives linked to development strategies**

**Option 1:** Delivery of the housing number through a single allocation on Site 8 'Land at Church Road (Site 3)'

**Option 2:** Delivery of the housing number through a single allocation on Site 2 'Walnut Tree Caravan Site'

**Option 3:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 8 'Land at Church Road (Site 3)'

**Option 4:** Delivery of the housing number through a combination of allocations at Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site'

**Option 5:** Delivery of the housing number through a combination of allocations at Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Lodge'

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference				
		Option 1	Option 2	Option 3	Option 4	Option 5
Biodiversity and Geodiversity	<p>Whilst none of the sites directly overlap with the boundaries of a European designated site, Site 1 'Land west of Northfield's and Site 2 'Walnut Tree Caravan Site' are located approximately 500m to the west of the Chichester and Langstone Harbours Ramsar Site and SPA, and the Solent Maritime SAC (at their nearest points). Development at these locations therefore has the potential to increase recreational disturbances to the European designated sites, which is recognised as a key issue within the 'Solent' Site Improvement Plan.</p> <p>Comparatively, Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Close' are approximately 1km to the east of the Solent Maritime SAC and 1.5km to the east of the Chichester and Langstone Harbours Ramsar and SPA. Due to the relative distance of these sites in comparison to Site 1 and Site 2, Option 1 and Option 5 are perhaps less likely to significantly impact the integrity of these European designated sites when compared to Option 2, Option 3 and Option 4.</p> <p>Regarding national designations within the Neighbourhood Plan area, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' both overlap with SSSI IRZs for 'all planning applications, except householder applications'. Therefore, consultation with Natural England will be required to determine whether the applications will have any significant impacts to the integrity of the Chichester Harbour SSSI, along with the Chichester and Langstone Harbours Ramsar and SPA (which share overlapping boundaries with the SSSI). Similarly, Site 9 'Land at Eli's Lodge' overlaps with SSSI IRZs for 'all planning applications (except householder) outside or extending outside existing settlements / urban areas affecting greenspace, farmland, semi-natural habitats or landscape features such as trees, hedges, streams and rural buildings / structures'. As such, consultation with Natural England might also be required to determine whether an application would result in significant impacts to the Bracklesham Bay SSSI. Whilst the southern half of Site 8 'Land at Church Road (Site 3)' is within a SSSI IRZ for 'any residential development of 10 or more houses outside existing settlements/urban areas', the northern half of Site 8 is not likely to exceed the IRZ threshold for Bracklesham Bay SSSI for the type of development which is likely to come forward at this location. As such, Option 2, Option 4 and Option 5 are likely to perform least favourably for nationally designated sites.</p>	1	=4	3	=4	2

<p>Biodiversity and Geodiversity (continued)</p>	<p>At the local level, none of the sites proposed through the options are within a SNCI or contain any BAP Priority Habitats. However, as described within the 'Fixing and Linking Our Wetlands' (FLOW) study completed by the Manhood Wildlife and Heritage Group, all four sites either contain or are within proximity to ecological features which contribute to the bat (<i>Chiroptera spp.</i>) network, with Site 2 'Walnut Tree Caravan Site' and Site 8 'Land at Church Road (Site 3)' also providing a suitable habitat for barn owls (<i>Tyto alba</i>), and Site 8 and Site 9 'Land at Eli's Lodge' also contributing to the water vole (<i>Arvicola amphibius</i>) network. Such features include hedgerows, trees and drainage ditches which can provide suitable habitats for these species, with most of the ditches within the study alongside site boundaries considered to be in a 'moderate' condition. Nonetheless, for all four options, these features could be retained and enhanced through development proposals associated with all options. This is particularly essential for Site 8, with the ditch passing through the central section of the site classified as being in a 'good' condition and supporting at least six different types of vegetation. Likewise, the ditch located along the southern boundary of Site 9 supports at least four different types of vegetation and remains wet throughout the year. As such, Option 1, Option 3 and Option 5 have increased potential to impact on these key components of local ecological networks.</p>	<p>1</p>	<p>=4</p>	<p>3</p>	<p>=4</p>	<p>2</p>
<p>Climate change</p>	<p>In terms of climate change mitigation, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' are within proximity to services and facilities in West Wittering, with Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Lodge' within proximity to the services and facilities in East Wittering. This will help limit greenhouse gas emissions from transport through encouraging new development in locations with closer proximity to key amenities and public transport networks. However, as East Wittering contains a wider variety of services and facilities in comparison to West Wittering (including local shops, pharmacy and a primary school), Option 1, Option 3 and Option 5 are likely to perform more favourably in terms of climate change mitigation efforts.</p> <p>In relation to adapting to the effects of climate change, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' are within Flood Zone 1 and have a very low surface water flood risk. In comparison, there is a corridor of land along the northern and north eastern boundary of Site 8 which is within Flood Zone 3 and has a medium to high surface water flood risk. Likewise, there is a corridor of land alongside the southern boundary of Site 9 (on Cakeham Road) which is within Flood Zone 3 and has a medium surface water flood risk. These corridors of land are adjacent to ditches which form part of the East Wittering drainage system, identified within the FLOW study as the 'key waterways' or 'critical routes' of the local drainage network which will cause the most significant flooding to properties or infrastructure if blocked or poorly maintained. Given that within site boundaries the areas of flood risk are limited, and can be readily avoided through new development areas, flood risk is unlikely to comprise a significant constraint to development through all options. Likewise, it is also considered that the provisions of the NPPF and national policy (including relating to the sequential / exception test) will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented.</p>	<p>=1</p>	<p>=3</p>	<p>2</p>	<p>=3</p>	<p>=1</p>

Landscape	<p>In terms of nationally protected landscapes, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' are both located within the boundaries of the Chichester Harbour AONB. The scale of proposals likely to come forward through Option 2 and Option 4 would likely constitute 'major development' within the AONB, with the potential to negatively impact upon the special qualities of Chichester Harbour as identified within the 2019-2024 Management Plan.</p> <p>At the local level, all the sites are within the Chichester Harbour and Pagham Harbour Landscape Character Area (LCA), as defined within the West Sussex Landscape Character Assessment (2003). The land management guidelines for this LCA emphasise the value of conserving and enhancing the character and setting of the villages and therefore, development through all the options has the potential to impact upon local character in the absence of sensitive design.</p> <p>Regarding landscape character, it is important to recognise that Site 2 'Walnut Tree Caravan Site' and Site 8 'Land at Church Road (Site 3)' are particularly large sites. Whilst the scale of proposals likely come forward through the Neighbourhood Plan will not likely to result in the development of the entire site areas, allocations at these locations will extend the settlement boundaries of East Wittering and West Wittering to the north. Comparatively, Site 1 is bound by residential dwellings at Northfields and along Summerfield road, to the east and south of the site respectively. An allocation at this location would square-off development in the northern section of West Wittering (bordering Ellanore Lane), which is perhaps less likely to significantly change the character of the villagescape. This is similar for Site 9 'Land at Eli's Close', with an allocation at this location likely to square-off development in the eastern section of East Wittering.</p> <p>For Site 2 'Walnut Tree Caravan Site', an allocation on the existing brownfield section of the site (i.e. the location of the existing mobile homes / static caravans) is likely to present an opportunity to positively contribute to the special qualities of the AONB by improving the design at this location. However, development in this section of the site is less likely since the area currently has permitted use for holiday caravans throughout the year, subject to their occupation being limited to holiday use only. There are also TPOs (both individual and a corridor/belt of trees) located along Ellanore Lane which forms the western boundary of Site 1 and Site 2 which have a local amenity value.</p> <p>In summary, the scale of proposals likely to come forward through Option 1 and Option 2 are likely to result in significant changes to local villagescape character. Alongside, Option 2 and Option 4 would deliver all the dwellings within the boundaries of the Chichester Harbour AONB, potentially constituting major development within a nationally protected landscape. Therefore, Option 3 and Option 5 are likely to perform most favourably in relation to the landscape SEA theme given that the scale of proposals which would be taken forward at these locations can potentially limit the impacts to the character of the settlements and the special qualities of the AONB. This is providing that proposals are appropriately sited adjacent to an existing built-up section of the settlement and they incorporate a sensitive design which respects the setting of the AONB and retains the TPOs, particularly for Site 1 'Land west of Northfields'.</p>	2	=4	3	=4	1
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<p>Historic Environment</p>	<p>In relation to historic environment constraints, West Wittering village centre has the largest concentration of features and areas of historic interest in the Neighbourhood Plan area, including West Wittering Conservation Area and 13 listed buildings. Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' do not contain and are not located adjacent to a nationally designated heritage asset. Whilst the West Wittering Conservation Area is located approximately 250m to the south of Site 1 and 300m to the south of Site 2 (at their nearest points), the area is not likely to be visible from either of the sites due to the relatively flat topography at these locations and the screening provided by other developments nearby. As such, Option 2 and Option 4 are unlikely to significantly impact the setting of any designated heritage assets.</p> <p>Comparatively, the Grade II listed 'The Thatched Tavern' is located directly adjacent to the north eastern boundary of Site 8 'Land at Church Road (Site 3)'. Therefore, Option 1, Option 3 and Option 5 have the potential to impact upon the setting of this nationally designated heritage asset in the absence of sensitive design. Nonetheless, it is important to note that appropriately siting development in Site 8 at a considerable distance from the heritage asset is likely to reduce the potential for any likely significant impacts on the Grade II listed structure, which could mitigate some impacts associated with these options. Site 9 'Land at Eli's Close' is approximately 600m to the east of the Grade II* listed 'Cokeham Manor' and its uninhabited parts (which are designated as a scheduled monument). However, the site is not visible from these heritage assets due to the screening provided by existing vegetation and the flat topography limiting longer views.</p> <p>At the local level, the Historic Environment Record for West Sussex contains 45 records within West Wittering Parish including a variety of Neolithic sites, Roman artefacts, medieval and post-medieval field systems, Bronze Age and Palaeolithic finds, and four locally distinctive buildings. In the absence of a detailed mapping system showing the location of these finds, it is uncertain whether any of the options are likely to impact upon any locally important heritage features.</p>	<p>3</p>	<p>=1</p>	<p>=2</p>	<p>=1</p>	<p>=2</p>
<p>Land, soil and water resources</p>	<p>Regarding the location of the best and most versatile land for agricultural purposes, a detailed ALC assessment has not been undertaken for most of the Neighbourhood Plan area. The provisional agricultural land classification dataset from Natural England suggests that most of the sites are underlain by Grade 2 (very good) agricultural land, with Site 9 'Land at Eli's Lodge' at the boundary between areas of Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. However, the predictive 'best and most versatile' (BMV) assessment confirms that all sites have a greater than 60% likelihood of containing BMV agricultural land<sup>11</sup>. Therefore, all five options have the potential to result in the loss of BMV land and areas of greenfield land within the parish. However, as Site 2 'Walnut Tree Caravan Site' contains an area of brownfield land currently occupied by mobile homes / static caravans and Site 9 contains an existing residential property and hardstanding, redevelopment in these areas of the sites will promote the most efficient use of land within the Neighbourhood Plan area.</p> <p>Regarding watercourses, there is a drainage ditch navigating along the northern and north eastern boundaries of Site 8 'Land at Church Road (Site 3)' and alongside the southern boundary and north western boundary of Site 9. Although water quality assessments have not been completed for the ditches, the FLOW study identifies these water resources as key components of the East Wittering drainage system. As such, Option 1, Option 3 and Option 5 perform least favourably in relation to the water resources in the Neighbourhood Plan area, unless appropriate mitigation measures are incorporated within new development areas.</p>	<p>3</p>	<p>1</p>	<p>=2</p>	<p>=2</p>	<p>=2</p>

<sup>11</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East', [online] available to access via: <<http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008>> last accessed [11/10/19]



<p>Land, soil and water resources (continued)</p>	<p>All the sites proposed through the options are within the 'Broad Rifer to Chichester Harbour' Surface Water Nitrate Vulnerable Zone. It is useful to acknowledge that new legal advice from Natural England in July 2019 recommends that new developments should only be permitted if they are nutrient neutral. However, this is a regional issue which is beyond the scope of the Neighbourhood Plan to address.</p> <p>There are no mineral safeguarding areas within the parish and as such, development will not compromise the integrity of mineral resources.</p>	<p><b>3</b></p>	<p><b>1</b></p>	<p><b>=2</b></p>	<p><b>=2</b></p>	<p><b>=2</b></p>
<p>Population and community</p>	<p>In terms of the relative distance of the sites from local services and facilities, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' are within walking distance from West Wittering village centre, which contains the Old House at Home pub, the parish church and the West Wittering Memorial Hall. Located along the western boundaries of Site 1 and Site 2, Ellanore Lane is a right of way which facilitates the pedestrian access to the village centre.</p> <p>Nevertheless, it is important to acknowledge that there is a wider variety of services and facilities in the neighbouring settlement of East Wittering, including the East Wittering Community Primary, local shops and a local pharmacy. Therefore, Option 1 and Option 5 are likely to perform the most favourably in relation to this SEA theme. Site 8 'Land at Church Road (Site 3)' benefits from pedestrian access into East Wittering village centre via a footpath along Church Road, with Site 9 'Land at Eli's Lodge' benefiting from pedestrian access into the village centre along Cakeham Road.</p>	<p><b>=1</b></p>	<p><b>=3</b></p>	<p><b>2</b></p>	<p><b>=3</b></p>	<p><b>=1</b></p>
<p>Health and Wellbeing</p>	<p>The benefits to wellbeing and mental health resulting from close contact with the natural environment are well-documented. In this respect, there are local allotments and a football ground within proximity to Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site'. Similarly, both Site 1 and Site 2 are adjacent to Ellanore Lane which connects to the 'New Lipchis Way', a coastal footpath around the Chichester Harbour coastline, with Site 9 'Land at Eli's Lodge' approximately 500m to the north of the sand and shingle beach at Bracklesham Bay. Option 2, Option 4 and Option 5 are therefore likely to encourage active lifestyles by facilitating access to local open spaces and the coast. This is likely to positively respond to one of the key challenges identified within the JSNA for West Sussex, where approximately 20% of adults are physically inactive and 60% of adults are estimated to be overweight.</p> <p>Although Site 8 'Land at Church Road (Site 3)' is adjacent to a footpath along Church Road which provides access into East Wittering village centre, Option 1 and Option 3 will contribute less to facilitating access to open spaces and the natural environment. However, access to services and facilities is also an important contributor to health and wellbeing. The nearest pharmacy - 'The Witterings' - and medical centre are within the settlement of East Wittering, which contains a wider variety of local services and facilities in comparison to West Wittering. Option 1, Option 3 and Option 5 are therefore likely to perform the most favourably in this respect.</p>	<p><b>=2</b></p>	<p><b>=2</b></p>	<p><b>=2</b></p>	<p><b>=2</b></p>	<p><b>1</b></p>

Transport	<p>Site 8 'Land at Church Road (Site 3)' and Site 9 'Land at Eli's Lodge' are approximately 500m to the north and to the west of the services and facilities in East Wittering, respectively. These services and facilities are accessible via pedestrian walkways along Church Road (Site 8) and Cakeham Road (Site 9). Likewise, there is a bus stop located to the north of Site 8 (along Piggery Hall Lane), to the east of Site 9 (adjacent to Russell Road) and within East Wittering village centre (along Stocks Lane), providing connections to the public transport network. Similarly, Site 1 'Land west of Northfields' and Site 2 'Walnut Tree Caravan Site' are within proximity to local services and facilities in West Wittering and local bus stops along the B2179 (Rookwood Road).</p> <p>The Neighbourhood Plan area is not connected to the rail network, with the nearest station accessible in Chichester, approximately 11km to the north of the parish. Although both settlements have relatively regular bus services, public transport use is likely to remain low compared with private car use. Regarding congestion issues, the B2179 is particularly sensitive to traffic issues during peak times of year (i.e. holiday seasons) and at weekends. Given the absence of a local shop, pharmacy and school in the village centre of West Wittering (which are available in East Wittering), Option 2 and Option 4 are less likely to reduce the dependence on private vehicles for undertaking some day-to-day activities within the Neighbourhood Plan area. This could exacerbate local congestion issues, although it is important to note that the scale of proposals through the Neighbourhood Plan are perhaps less likely to significantly increase road traffic issues.</p>	=1	=3	2	=3	=1
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**Summary of assessment**

This assessment has highlighted that delivering the Neighbourhood Plan area's housing requirement through Option 2 and Option 4 has increased potential to have significant impacts to European and nationally designated sites for biodiversity and nationally protected landscapes. Specifically, the options would likely increase the recreational pressures to the Chichester and Langstone Harbours Ramsar Site and SPA and the Chichester Harbour SSSI, with the scale of proposals also likely to negatively impact upon the special qualities of the Chichester Harbour AONB. However, these options perform relatively favourably in relation to the 'Land, Soil and Water Resources' and 'Historic Environment' SEA themes, locating development away from designated heritage assets and potentially facilitating the most efficient use of land through the redevelopment of the brownfield area in Site 2 'Walnut Tree Caravan Site'.

Comparatively, Option 1, Option 3 and Option 5 have the potential to deliver the greatest benefits in relation to the 'Population and Community' and 'Transportation' SEA themes, particularly in terms of access to services and facilities and encouraging more sustainable methods of travel for undertaking some day to day activities within the Neighbourhood Plan area. Nonetheless, this assessment has highlighted that these options have an increased potential to have significant impacts to nationally designated heritage features and water resources. Specifically, the options could impact upon the setting of the Grade II listed 'The Thatched Tavern' and the integrity of local drainage ditches which are identified in the FLOW study as a key component of the East Wittering drainage system.

## Assessment of reasonable alternatives for the use of housing in the Neighbourhood Plan area

- 4.17 Following consultation with the local community, a further element which the Neighbourhood Group were keen to explore was the issue of second home ownership within West Wittering.
- 4.18 The Neighbourhood Plan area is a destination for holiday makers and day trippers, including to Chichester Harbour AONB and the beaches along the coastline. This has resulted in a recent rise in the number of second homes and holiday homes. According to the 2011 census, West Wittering has 1,352 households (1,740 dwellings), a significant number of which are second homes. Specifically, the Neighbourhood Group have determined that approximately 21.5% of dwellings in West Wittering are second homes, compared to 3.5% in the city of Chichester and 10.5% in the neighbouring settlements of East Wittering and Bracklesham.
- 4.19 This has led to a perspective that the number of second homes has had an impact on the ability of local residents to rent or buy in the parish. In addition, there is a perspective that an increase in second homes is creating traffic, congestion and parking issues during peak visitor periods.
- 4.20 To consider this issue in more detail, and provide further sustainability context, the SEA process has appraised two options, as follows:
- **Option 1:** Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership in the Neighbourhood Plan area through introducing restrictions on the use of new housing; and
  - **Option 2:** Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.
- 4.21 These two broad options were appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). They were considered through the SEA Framework of objectives and assessment questions developed during scoping and ranked in terms of their sustainability performance against the relevant theme. The findings of the appraisal are presented in **Table 4.3** below.

**Table 4.3: Appraisal findings: reasonable alternatives linked to housing use**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Option 1	Option 2
<b>Biodiversity and geodiversity</b>	Option 2 has the potential to lead to increased effects on biodiversity assets during peak holiday periods. This includes through increasing the intensity of recreational activities which affect designated sites in the plan area, including the Chichester and Langstone Harbours Ramsar Site and SPA, and the Solent Maritime SAC, which are sensitive to public access and disturbances. Nonetheless, both options have the potential to have significant impacts on biodiversity assets with inappropriate development. For both options, potential effects on biodiversity therefore depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.	=	=

**Option 1:** Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership in the Neighbourhood Plan area through introducing restrictions on the use of new housing.

**Option 2:** Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Option 1	Option 2
<b>Climate change</b>	<p>In terms of adaptation to the effects of climate change, an increase in the Neighbourhood Plan area's year round (rather than seasonal) population through Option 1 has the potential to increase resilience to extreme weather events. This includes through increasing the year round availability of 'human capital', which will help improve the maintenance of existing properties (and neighbourhoods) and enabling a more effective response to extreme weather events when they occur.</p> <p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the Neighbourhood Plan area. Whilst greenhouse gas emissions are likely to increase during peak holiday periods under Option 2, Option 1 has the potential to increase the carbon footprint of the Neighbourhood Plan area during the rest of the year. Overall it is uncertain at this level of detail which of the options is likely to do most to limit greenhouse gas emissions over an annual period.</p>	=	=
<b>Landscape</b>	<p>A policy which seeks to restrain second home ownership in the Neighbourhood Plan area is unlikely to have any significant implications for landscape quality or character. However, Option 2 does have the potential to increase the intensity of recreational activities in the Chichester Harbour AONB during peak times of the year, which could potentially detract from the special qualities of the AONB. Nonetheless, potential effects depend largely on the location, design and layout of new development areas.</p>	=	=
<b>Historic Environment</b>	<p>A policy which seeks to restrain second home ownership in the Neighbourhood Plan area is unlikely to have any significant implications for the historic environment. However, Option 1, through increasing the year-round population, has the potential to encourage residents to regularly maintain buildings (and the landscaped areas immediately surrounding them) to a good standard. This could positively contribute to and enhance the setting of nearby heritage assets. Nonetheless, potential effects depend largely on the location, design and layout of new development areas.</p>	=	=
<b>Land, soil and water resources</b>	<p>In terms of soil quality and availability, the tenure of new housing in the plan area is unlikely to have significant effects.</p> <p>Option 1, through increasing the year-round population, has the potential to encourage residents to undertake activities to support the maintenance of drainage ditches in the immediate areas surrounding their dwellings. This will maintain the flow of the local drainage network, protecting the integrity of local water resources. However, potential effects depend largely on the location, design and layout of new development areas.</p>	1	2
<b>Population and community</b>	<p>Recent surveys have highlighted that approximately 21.5% of dwellings in West Wittering are second homes. In this context, a policy restricting the use of new homes as second homes or holiday lets through Option 1 will provide increased opportunities for local people to secure a place on the housing ladder or afford larger homes.</p> <p>Option 1, through increasing the year-round population, also has increased potential to support the viability of services and amenities, including health and education provision. It will also support the viability of public transport provision. This will promote accessibility to services, facilities and amenities amongst local people.</p>	1	2

**Option 1:** Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership in the Neighbourhood Plan area through introducing restrictions on the use of new housing.

**Option 2:** Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Option 1	Option 2
Health and wellbeing	Option 1, through facilitating a larger increase in the year-round population of the Neighbourhood Plan area, has the potential to support the viability of health services and leisure and recreational facilities.	1	2
Transport	Congestion levels in the Neighbourhood Plan area are significantly affected by visitor traffic. This is particularly observed along the B2179, which is the main route into West Wittering. In this context, Option 2 is likely to exacerbate congestion issues during peak times of the year, including the summer period and at weekends. Due to relatively small proportion of the total housing stock that will be affected by the options, effects are likely to be limited. Whilst Option 1 has the potential to increase year-round traffic flows, it also has the potential to support the viability of year-round public transport networks. This will support accessibility for those living in the Neighbourhood Plan area.	1	2

## Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

### Choice of sites taken forward for the purposes of the Neighbourhood Plan

4.22 Following the consideration of the assessment of reasonable alternatives for development options, Option 1 has been taken forward through the Neighbourhood Plan which seeks to deliver the housing target of 25 dwellings through a single allocation on Site 8 'Land at Church Road (Site 3)'. This site is identified in the HELAA as being suitable for the development of up to 230 homes, and therefore only a limited section of the site will be required to deliver the housing target (approximately 1ha of land).

4.23 The Neighbourhood Plan notes that the proposed allocation on the site will seek to:

- Minimise the landscape impact of the proposed allocation through siting the development in the southern section of the site. This limitation will, therefore, also seek to minimise the impact of the allocation on the Grade II listed 'The Thatched Tavern' to the north east of the site; and
- Incorporate the drainage ditch on the site as part of a landscape buffer to ensure its biodiversity and flood prevention functions are secured as part of the development.

4.24 The Neighbourhood Group's justification for the proposed allocation is as follows:

*"The Church Road site is capable of accommodating all 25 homes, and at this scale should also be capable of delivering benefits in the form of a robust landscape boundary to the north of the built development along the line of the ditch which traverses the site east to west. This landscaping will provide visual containment to the settlement edge, enhance the habitats and biodiversity and protect the important drainage function of the ditch. Such enhancements may not be achievable if fewer dwellings are allocated at this site in combination with either Eli's Lodge or Northlands. The development of the site at Eli's Lodge was considered to be detrimental to the sense of openness between built areas as it is highly visible and adjacent development is predominantly single-storey or caravans. The Northlands site is in the AONB and therefore should not be considered for major development where there are other options available (NPPF paragraph 172)".*

4.25 Following the consideration of the assessment of reasonable alternatives for the use of housing in the Neighbourhood Plan area, the current version of the Neighbourhood Plan places a condition on open market housing that the houses should be occupied as a principal residence.

This is given the proportion of second or holiday homes has recently increased (reflecting increased demand for such properties), and the perception that this is having a significant impact on the ability of residents, their relatives and those with other local connections to rent or buy in the parish. This proposed approach has also been supported through consultation events undertaken for the Neighbourhood Plan to date.

## Neighbourhood Plan policies

4.26 To support the implementation of the vision statement for the Neighbourhood Plan, the Regulation 14 version of the West Wittering Neighbourhood Plan puts forward 14 policies to guide new development within the Neighbourhood Plan area, along with eight community aspirations to help achieve the vision of the Plan. These were developed following extensive community consultation and evidence gathering and are listed in **Table 4.4** (overleaf).

**Table 4.4: Neighbourhood Plan policies**

Reference	Name
<b>Policies</b>	
Policy WW1	Design
Policy WW2	Preventing Coalescence
Policy WW3a	Allocation of land at Church Road for 25 Homes
Policy WW3b	Allocation of land at Rookwood Road for 15 Affordable Homes
Policy WW3c	Windfall Housing Development
Policy WW4	Principal Residence Requirement
Policy WW5	Visitor Accommodation and Facilities
Policy WW6	Economic Development
Policy WW7	Retail Facilities
Policy WW8	Public Rights of Way and Quiet Lanes
Policy WW9	Coastal Enhancements
Policy WW10	Biodiversity, Geodiversity and Mitigating the Impacts of Climate Change
Policy WW11	Community Facilities and Open Spaces
Policy WW12	Lighting
<b>Community Aspirations</b>	
Community Aspiration 1	Engagement and Inclusion
Community Aspiration 2	Highways and Transport
Community Aspiration 3	Community Led Housing
Community Aspiration 4	Lighting
Community Aspiration 5	Community Assets
Community Aspiration 6	Integrated Coastal Zone Management for the Manhood Peninsula
Community Aspiration 7	Watercourse Management
Community Aspiration 8	Chichester Harbour

## 5. What are the appraisal findings at this current stage?

### Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 consultation version of the West Wittering Neighbourhood Plan. This chapter presents:

- An appraisal of the current version of the Neighbourhood Plan under the eight SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Approach to this appraisal

5.2 The appraisal is structured under the eight themes taken forward for the purposes of the SEA.

5.3 For each theme, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### Biodiversity and Geodiversity

5.5 The Neighbourhood Plan area is constrained in biodiversity terms. There are three European designated sites which partly overlap with the Neighbourhood Plan area: the Chichester and Langstone Harbours Ramsar Site and Special Protection Area (SPA), and the Solent Maritime Special Area of Conservation (SAC). The Bracklesham Bay Site of Special Scientific Interest (SSSI), Chichester Harbour SSSI and two Sites of Nature Conservation Interest (SNCI) are also located within the Neighbourhood Plan area, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). There are also three Local Nature Reserves (LNR) located within proximity to West Wittering. Additionally, the Neighbourhood Plan area contains a variety of ecologically important drainage ditches and Biodiversity Action Plan (BAP) Priority Habitats and Species. In light of these constraints, there will be a need for potential effects on biodiversity linked to future development in the Neighbourhood Plan area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest and 2) support the resilience of ecological networks.

5.6 Regarding the three European designated sites which partly overlap with the Neighbourhood Plan area, the Site Improvement Plan (SIP) for 'The Solent'<sup>12</sup> outlines that public access / disturbance and coastal squeeze are two of the key pressures and threats facing the ecological features of these sites. Therefore, Policy WW11 'Community Facilities and Open Spaces' has

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<sup>12</sup> Natural England (2014): 'SIP: Solent', [online] available to access via:  
<<http://publications.naturalengland.org.uk/publication/4692013588938752>> last accessed [07/11/19]

the potential to indirectly benefit the European sites through protecting the number of alternative open spaces for recreational uses within the parish. The protection of these spaces will also bolster locally important areas of Biodiversity Action Plan (BAP) priority habitats in West Wittering against potential threats from development, by maintaining the availability of connectivity corridors and stepping stones between them. This is further supported through the provisions of Policy WW9 'Coastal Enhancement's and Community Aspiration 8 'Chichester Harbour' which aim to improve the quality of the coastline's flora and fauna. Additionally, Policy WW12 'Lighting' states that proposals which may affect Chichester Harbour must demonstrate that there will be no significant adverse effects on its wildlife. It is also useful to note that the proposed site allocation through Policy WW3a on 'Land at Church Road' is approximately 1km to the east of the Solent Maritime SAC and 1.5km to the east of the Chichester and Langstone Harbours Ramsar and SPA. Given the Neighbourhood Plan will be in conformity with the quantum and location of development in the adopted Chichester Local Plan and the emerging Chichester Local Plan Review, no additional effects are anticipated in relation to the integrity of the European designated sites.

- 5.7 In relation to the SSSIs located within and within proximity to the parish, most of the Neighbourhood Plan area is within SSSI IRZs for residential, rural residential and rural non-residential development types. The southern half of the proposed site allocation through Policy WW3a 'Allocation of land at Church Road for 25 homes' is within an SSSI IRZ for 'any residential development of 10 or more houses outside existing settlements/urban areas'. Therefore, consultation with Natural England will be required to determine whether the allocation at this location will have any significant impacts to the integrity of the Bracklesham Bay SSSI. The SSSI does not share an overlapping boundary with the Solent Maritime SAC.
- 5.8 Published in July 2018, paragraph 170 (d) within the revised NPPF<sup>13</sup> states that planning policies and decisions should contribute to and enhance the natural and local environment by '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks*', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan<sup>14</sup> which was published in January 2018. In this respect, objective B within Policy WW3a 'Allocation of land at Church Road for 25 homes' affirms that the mature hedgerow along the boundary with Church Road should be retained and reinforced through proposals. Additionally, objective C within Policy WW3a states that the design of the development will demonstrate net biodiversity gain, with objective D stating that the habitats alongside the drainage ditch passing through the site will be protected and enhanced as part of a landscape buffer to the site, with particular attention given to designated habitats nearby. Similarly, Policy WW10 'Biodiversity, Geodiversity and Mitigating the Impacts of Climate Change' outlines support for development proposals that achieve a net-gain in biodiversity assets and enhance natural capital.
- 5.9 Ecological networks within the Neighbourhood Plan area are also supported by Policy WW10, which highlights that in addition to the European, national and locally designated sites in the area, the wealth of undesignated ecological assets within the parish will be expected to be retained and enhanced through development proposals. As described within the 'Fixing and Linking Our Wetlands' (FLOW) study completed by the Manhood Wildlife and Heritage Group, 'Land at Church Road' contains ecological features which contribute to the bat network (*Chiroptera spp.*), barn owl network (*Tyto alba*) and water vole network (*Arvicola amphibius*). Such features include hedgerows, trees and drainage ditches which can provide suitable habitats for these species. The ditch passing through the central section of the site is also classified as being in a 'good' condition and supporting at least six different types of vegetation. As such, Objective C within Policy WW3a asserts that the design of the development shall have particular attention to bat, barn owl and other farmland bird habitats on the site.

<sup>13</sup> MHCLG (2018): 'Revised National Planning Policy Framework', [online] available to access via: <<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>> last accessed [05/11/19]

<sup>14</sup> DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: <<https://www.gov.uk/government/publications/25-year-environment-plan>> last accessed [05/11/19]



- 5.10 The provision of these policies and community aspirations will ensure that ecological sensitivities are appropriately considered during the planning, construction and operational phases for new development proposals which come forward during the plan period. As such, the Neighbourhood Plan sets out a range of provisions which will support and enhance habitats, species and ecological networks in the Neighbourhood Plan area.

## Climate Change

- 5.11 The Neighbourhood Plan acknowledges that Chichester District Council resolved to declare a 'climate emergency'<sup>15</sup> in July 2019, made in response to the LPA's target for Chichester to become carbon neutral by 2050. In the context of the West Wittering Neighbourhood Plan, consultation has highlighted that parishioners view the declaration as a significant 'call for action' to tackle the consequences and causes of the climate crisis and that there is a need to embed environmentally sustainable practices in response to the challenges faced. As such, policies and community aspirations within the Neighbourhood Plan emphasise the importance of mitigating and adapting to the climate crisis.
- 5.12 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Based on the 2011 Census data, the most regularly used method of travelling to work in the parish is via driving, with 83.9% of households in the Neighbourhood Plan area having access to at least one car or van. With reference to the proposed allocation at 'Land at Church Road', objective E within Policy WW3a confirms that the design of the development will be fully integrated into the village so that residents can walk or cycle to access local facilities. This will positively contribute to climate change mitigation efforts through reducing the need to travel via car for day-to-day activities.
- 5.13 With reference to adapting to the effects of climate change, there is a corridor of land along the northern and north eastern boundary of the proposed allocation on 'Land at Church Road' which is within Flood Zone 3 and has a medium to high surface water flood risk. This corridor of land is adjacent to a ditch which forms part of the East Wittering drainage system, identified within the FLOW study as one of the 'key waterways' or 'critical routes' of the local drainage network which will cause the most significant flooding to properties or infrastructure if blocked or poorly maintained. In this regard, Community Aspiration 7 'Watercourse Management' within the Neighbourhood Plan seeks to encourage landowners and statutory bodies to restore and maintain riparian ditches and waterways. Likewise, it is also considered that the provisions of the NPPF and national policy (including relating to the sequential / exception test) will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented.
- 5.14 Additionally, the protection and enhancement of open spaces and habitats within the Neighbourhood Plan area, facilitated through Policy WW10 'Biodiversity, Geodiversity and Mitigating the Impacts of Climate Change' and Policy WW11 'Community Facilities and Open Spaces', will support climate change mitigation and adaptation efforts. For example, through safeguarding natural carbon sequesters located within the landscape (i.e. trees and hedgerows) and positively responding to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off.

## Landscape

- 5.15 The western half of the Neighbourhood Plan area overlaps with the Chichester Harbour AONB. Completed to support the preparation of the Neighbourhood Plan, the Local Landscape Character Assessment defines and classifies five distinctive character areas across the parish. Policies within the Neighbourhood Plan seek to draw on these distinctive characteristics through having a strong focus on protecting the sense of place and special qualities of West Wittering, respecting the setting of the AONB and safeguarding the integrity of the character areas.

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<sup>15</sup> Chichester District Council (2019): 'Council declares a climate emergency', [online] available to access via: <<https://www.chichester.gov.uk/article/31755/Council-declares-a-climate-emergency>> last accessed [07/11/19]

- 5.16 For example, Policy WW1 'Design' states that development will be permitted provided that its design, form and detail is of a high quality to reflect the attractive and unique landscape, seascape and townscape character of West Wittering, having regard to the Village Design Statement<sup>16</sup> and the character areas defined within it, and to the Chichester Harbour Management Plan (where relevant). Therefore, this policy takes a proactive and positive approach to protecting and enhancing the character and visual amenity of the Neighbourhood Plan area. Likewise, Policy WW2 'Preventing Coalescence' seeks to safeguard the 'green gap' between the two main settlements areas of West Wittering (the western historic section of the village and the more modern post war eastern section of the village which abuts East Wittering) from inappropriate development which would detract from the openness and landscape character of the area. Furthermore, the Chichester Harbour Management Plan identifies the night sky as part of the scenic beauty of the AONB. In this respect, Policy WW12 'Lighting' confirms that proposals that are within or may affect the AONB must meet the dark skies policies in the Management Plan, control illumination to minimise unnecessary glare and spillage (objective 2 of Policy WW12) and have no significant impact to the wider landscape (objective 3 of Policy WW12).
- 5.17 Policy WW9 'Coastal Enhancements' is supportive of proposals which would enhance the exceptional ecological and landscape assets of the area providing that they take account of the integrated coastal zone management strategies for the Manhood Peninsula and the Chichester Harbour Conservancy Management Plan. Additionally, Community Aspiration 4 'Lighting' within the Neighbourhood Plan aims to encourage local authorities, businesses and residents to make improvements to existing lighting to reduce its negative impact on the tranquillity of the AONB. Alongside Community Aspiration 8 'Chichester Harbour', which aims to continually work with Chichester Harbour Conservancy to protect the foreshores, footpaths, flora and fauna of the harbour area, the provisions of Policy WW9 and Community Aspiration 7 will further support the integrity and special qualities of the AONB.
- 5.18 Whilst the proposed site allocation through Policy WW3a 'Allocation of land at Church Road for 25 homes' is outside of the AONB, the site is within the Chichester Harbour and Pagham Harbour Landscape Character Area (LCA), as defined within the West Sussex Landscape Character Assessment (2003). The land management guidelines for this LCA emphasise the value of conserving and enhancing the character and setting of the villages and therefore, development has the potential to impact upon local character in the absence of sensitive design. Whilst the scale of proposals likely come forward through the Neighbourhood Plan will not likely to result in the development of the entire site area, allocation on 'Land at Church Road' will extend the settlement boundary of East Wittering, to the north. In this regard, objective B within Policy WW3a states that the design of the development will incorporate a landscape buffer to the north and west to limit the impact of the development on the wider countryside. This will support a limitation of effects on the open countryside and safeguard these areas from inappropriate scales of development.

## Historic Environment

- 5.19 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas that are internationally, nationally and locally valued for their cultural heritage interest, including one Grade I listed building, one Grade II\* listed building, 27 Grade II listed buildings, the Cakeham Manor (uninhabited parts) scheduled monument, and the West Wittering Conservation Area. These sensitivities are reflected by Neighbourhood Plan policies which have a strong focus on conserving and enhancing buildings and structures of architectural or historic interest, both designated and non-designated, and their settings.
- 5.20 Policy WW1 'Design' states that development will be permitted provided that its design, form and detail is of a high quality to reflect the townscape character of West Wittering, having regard to the Village Design Statement (VDS). The VDS provides an overview of the history and archaeology of the Neighbourhood Plan area, alongside several planning guidelines and principles for each distinctive character area. In this respect the VDS provides an appropriate

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<sup>16</sup> West Wittering Parish Council (2006): 'West Wittering Village Design Statement', [online] available to access via: <<http://www.westwitteringparishcouncil.gov.uk/policy-and-reference-document>> last accessed [06/11/19]

basis for encouraging the application of sensitive design and mitigation measures through new development and redevelopment in the Neighbourhood Plan area. This is likely to provide opportunities for development to positively contribute to the fabric and setting of heritage assets through incorporating high-quality design which reflects the historic character and special qualities of the parish.

- 5.21 The proposed spatial strategy within the Neighbourhood Plan seeks to deliver the housing target through a site allocation on 'Land at Church Road' (see Policy WW3a). Whilst the site allocation is not within or adjacent to the West Wittering Conservation Area or any scheduled monuments within the parish, the Grade II listed 'The Thatched Tavern' is located directly adjacent to the north eastern boundary of the site. As such, an allocation at this location has the potential to impact upon the setting of this nationally designated heritage asset in the absence of sensitive design. Nonetheless, it is important to note that appropriately siting development at a considerable distance from the heritage asset and incorporating appropriate screening and landscaping is likely to reduce the potential for any likely significant impacts on the Grade II listed structure. This is acknowledged through objective B in Policy WW3a which confirms that the design of the development will incorporate a landscape buffer to the north and west to limit the impact of the development to 'The Thatched Tavern'.
- 5.22 It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. Following a high-level review of the Historic Environmental Record (HER) for West Sussex (accessed via the Heritage Gateway)<sup>17</sup>, there are 45 records of locally important features within West Wittering Parish. In response objective F within Policy WW3a confirms that any planning application will need 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 the site.

## Land, Soil and Water Resources

- 5.23 In terms of the location of the best and most versatile (BMV) agricultural land, the provisional agricultural land classification dataset from Natural England suggests that the proposed site allocation on 'Land at Church Road' is underlain by Grade 2 (very good) agricultural land, with the predictive 'best and most versatile' (BMV) assessment confirming that the site has a greater than 60% likelihood of containing BMV agricultural land. An allocation at this location through Policy WW3a would therefore result in the permanent loss of productive agricultural land.
- 5.24 Regarding watercourses, there is a drainage ditch navigating along the northern and north eastern boundaries of the proposed site allocation on 'Land at Church Road'. Although water quality assessments have not been completed for the ditch, the FLOW study identifies this water resource as a key component of the East Wittering drainage system. This is acknowledged through the proposed site allocation on 'Land at Church Road', with objective D of Policy WW3a confirming that the ditch / drain passing through the site shall be retained and maintained as a key part of the local drainage network. Alongside Community Aspiration 6 'Integrated Coastal Zone Management for the Manhood Peninsula' and Community Aspiration 7 'Watercourse Management', the provision of this policy will protect the integrity of the drainage network and the coastal areas within and surrounding West Wittering.
- 5.25 The Neighbourhood Plan also seeks to incorporate existing natural features within new development areas through the provision of Policy WW10 'Biodiversity, Geodiversity and Mitigating the Impacts of Climate Change'. The protection and enhancement of open areas are also supported through the provisions of Policy WW11 'Community Facilities and Open Spaces'. These policies will further promote the ability of natural processes to safeguard and enhance soil and water resources. This will indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off, positively

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<sup>17</sup> Heritage Gateway (2019): Historic Environmental Record for West Sussex', [online] available to access via: <http://www.heritagegateway.org.uk/gateway/> last accessed [13/04/19]

contributing to the Water Framework Directive's objective of achieving 'good status' for as many watercourses as possible by 2027.

## Population and Community

- 5.26 Regarding the housing target for the Neighbourhood Plan area, West Wittering is identified as a 'service village' in both the adopted Chichester Local Plan: Key Policies 2014-2029 and the emerging Chichester Local Plan Review 2016-2035. As discussed in Chapter 2 of this Environmental Report, the adopted Chichester Local Plan target of 50 dwellings will be met through existing planning permissions. However, Policy S5 'Parish Housing Requirements 2016-2035' within the emerging Chichester Local Plan identifies a further target of 25 new dwellings to be delivered in the Neighbourhood Plan area to 2035. As such, the Neighbourhood Plan takes an approach which seeks to deliver sustainable development which is sensitive to the environmental constraints and which is intended to meet specific housing requirements or other community objectives.
- 5.27 In this context, the Neighbourhood Plan seeks to meet the housing target through a single allocation through Policy WW3a 'Allocation of land at Church Road for 25 homes'. Specifically, objective A within Policy WW3a confirms that the development will comprise a mix of housing types to reflect local needs, including 30% affordable dwellings (in line with local plan provisions) and 30% as bungalows. The site benefits from pedestrian access into East Wittering village centre via a footpath along Church Road, with objective E in Policy WW3a confirming that the design of the development shall maximise opportunities for connectivity between the site and the development to the south, to ensure that the allocation is fully integrated into the village of East Wittering, supporting accessibility to services and facilities.
- 5.28 Policy S6 'Affordable Housing' within the emerging Chichester Local Plan Review goes on to state that Neighbourhood Plans can set out higher requirements for affordable housing provision where local evidence of need and viability support this. Produced in March 2018 to support the preparation of the Neighbourhood Plan, the Housing Needs Assessment (HNA) outlines that the sale price of residential dwellings in West Wittering is 35% higher than the average for the district. The HNA also highlights that there were 21 households on the district's housing register with a local connection to West Wittering, with nine of these households considered as having a high priority housing need. This is supported through the provisions of Policy WW3b 'Allocation of land at Rookwood Road for 15 Affordable Homes' subject to (amongst other considerations) the development providing 100% affordable housing with a mix of dwelling sizes and managed by a Community Land Trust or similar. This is supported through Community Aspiration 3 'Community Led Housing' within the Neighbourhood Plan. To meet any residual housing needs during the plan period, Policy WW3c 'Windfall Housing Development' affirms that new housing development will be supported within the settlement boundaries provided that the development comprises a mix of housing types to reflect local needs (including at least 30% as bungalows) and provided the development would not result in a loss of small units (1 to 2 bedrooms) or bungalows.
- 5.29 As discussed within Chapter 4 of this Environmental Report, the Neighbourhood Plan area is a destination for holiday makers and day trippers to the Chichester Harbour AONB and the beaches along the coastline. Community consultation on the Neighbourhood Plan has highlighted a significant concern that an increasing number of holiday homes and second homes have the potential to affect the vitality of the Neighbourhood Plan area. In recognition of this, the Neighbourhood Plan through Policy WW4 'Principal Residence Requirement' affirms that new open market housing (excluding replacement dwellings) will only be supported where there is a restriction to ensure its occupancy as a principal residence. Whilst it is recognised that these provisions may potentially be difficult to implement, the policy has the potential to support the availability and affordability of new housing and improve accessibility to the housing stock for local people.
- 5.30 Maintaining and enhancing the diversity of local community infrastructure is essential for the vitality of settlements, encouraging growth and meeting the needs of all residents. For example, Policy WW11 'Community Facilities and Open Spaces' is supportive of proposals for the provision of new community infrastructure. Proposals which would result in the loss of such

infrastructure will only be acceptable if it is 1) no longer needed or 2) replaced by equivalent or better provision in terms of quantity and quality. Additionally, Community Aspiration 1 'Engagement and Inclusion' within the Neighbourhood Plan aims to ensure continual effective engagement with all residents to achieve a village with a strong sense of community. As such, the provisions of these policies and community aspiration will support mixed, balanced and inclusive communities, aligning with both national and local policy objectives.

- 5.31 In terms of the economic vitality of the Neighbourhood Plan area, Policy WW5 'Visitor Accommodation and Facilities' acknowledges the importance of tourism within West Wittering. Specifically, the policy is supportive of additional visitor accommodation and facilities that would encourage longer term and year-round visitors, provided that the accommodation would not become a nuisance to residents. Similarly, Policy WW9 'Coastal Enhancements' outlines support for strategies which would improve the quality of the coastline within the parish, indirectly benefiting the tourism industry. Furthermore, Policy WW6 'Economic Development' and Policy WW7 'Retail Facilities' aim to safeguard and enhance the prospects for employment locally, supporting new developments for small businesses and protecting the retail offer within the Neighbourhood Plan area.

## Health and Wellbeing

- 5.32 Reflecting the outcomes of the JSNA for West Sussex, the Public Health Profile for Chichester District contains a variety of key statistics which help to build an understanding of the community needs. The findings indicate that the rate over 65 year-olds within Chichester will increase at an average of +4,800 per year until 2032. Based on Census data, health and wellbeing levels in the Neighbourhood Plan area are generally lower than regional and national trends, with a lower percentage of residents reporting 'good' or 'very good' health. In this respect, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents within the parish, as well as addressing some of the key statistics within the health profile.
- 5.33 For example, the benefits to physical and mental health and wellbeing from close contact with the natural environment are well-documented, and there is a strong drive to maintain and improve access to open spaces through the Neighbourhood Plan. For example, Policy WW8 'Public Rights of Way and Quiet Lanes' encourages proposals which would enhance these areas for informal recreational use, resisting any proposals which would result in the loss or degradation of such routes. Policy WW8 also states that opportunities will be taken to facilitate the implementation of new cycleways and the upgrade of footpaths. This is particularly beneficial with regards to the proposed site allocation on 'Land at Church Road' through Policy WW3a, as the site provides pedestrian access into East Wittering village centre via a footpath along Church Road. This is reinforced through objective E within Policy WW3a, which confirms that the design of the development will be fully integrated into the settlement to facilitate good connectivity to the services and facilities in the village centre and the surrounding open areas.
- 5.34 Housing deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to the quality and availability of housing an important focus of Policy WW1 'Design', Policy WW3a 'Allocation of land at Church Road for 25 Homes' and Policy WW3b 'Allocation of land at Rookwood Road for 15 Affordable Homes'. Likewise, the nearest pharmacy and medical centre are within the settlement of East Wittering, within walking distance to the proposed site allocation on 'Land at Church Road'.
- 5.35 The Neighbourhood Plan also contains several policies which will positively support the quality of life of residents and the satisfaction of residents in the Neighbourhood Plan area as a place to live. Policy WW9 'Coastal Enhancements' acknowledges the value of the coastal environment within the parish, supporting proposals for the enhancement of these areas. Furthermore, Policy WW11 'Community Facilities and Open Spaces' identifies ten areas of particular importance within West Wittering, including: Millennium Meadow / Field, the Rookwood Road Football Pavilion and the Cricket Pavilion. Proposals that would result in the loss of these existing open spaces will be resisted and only permissible in the exceptional circumstances as stipulated through Policy WW11. Likewise, Community Aspiration 5 'Community Assets' within the Neighbourhood Plan seeks to identify buildings and land of value

within West Wittering, with a view to registering these as assets of community value. This will positively contribute to the protection and integrity of the public realm, supporting residents' health, social and cultural wellbeing through maintaining the sense of place and identity of the Neighbourhood Plan area. Furthermore, Policy WW12 'Lighting' seeks to ensure that light levels minimise unnecessary glare and spillage (objective 2), respect neighbouring developments (objective 3), and are the minimum required for safety and security purposes in line with relevant British Standards (objective 1 and objective 4 of the Policy).

## Transportation

- 5.36 Each Local Transport Authority in England and Wales has a statutory duty to produce, adopt and regularly review their Local Transport Plan (LTP) through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the West Sussex LTP3 2011-2026 is a strategic policy tool through which the LPA exercises its responsibilities for planning, management and the development of transport in the area.
- 5.37 With reference to the Neighbourhood Plan area, there is a need to ensure that developments have good accessibility to a range of services and facilities. Supporting modal shift, the proposed site allocation on 'Land at Church Road' which is approximately 500m to the north of the services and facilities in East Wittering, which includes a local shop, primary school, GP surgery and public house. These services and facilities are accessible via a pedestrian walkway along Church Road. Likewise, there is a bus stop located along Piggery Hall Lane) and within East Wittering village centre (along Stocks Lane), providing connections to the public transport network. This is reinforced through objective E within Policy WW3a which confirms that the design of the development will be fully integrated into the village so that residents can walk or cycle to access local facilities. Furthermore, Policy WW8 'Public Rights of Way and Quiet Lanes' states that any development that would result in the loss or degradation of such routes, for example through the introduction or increase in the amount of vehicular traffic, will be resisted. This will help ensure that new developments are situated in the most sustainable locations in terms of the relative distance to local centres, supporting the creation of inclusive communities and encouraging alternative options of transportation for undertaking day-to-day activities.
- 5.38 As acknowledged within the Neighbourhood Plan, the main route into West Wittering is the B2179 which is noted as a busy road and particularly so at commuter times. In this context, Community Aspiration 2 'Highways and Transport' within the Neighbourhood Plan acknowledges the value of liaising with stakeholders (including the LPA) to manage traffic and parking issues within the parish, particularly during the holiday season, to promote and support sustainable transport. Such measures would seek to prevent an increase in parked vehicles along the highway network and minimise congestion issues.

## Conclusions at this current stage

- 5.39 The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. This relates to the focus of the Neighbourhood Plan on safeguarding and enhancing community infrastructure, facilitating the delivery of housing which meets local needs and through supporting economic vitality by enhancing the prospects for employment locally. The Neighbourhood Plan is also likely to lead to significant positive effects in relation to the 'Health and Wellbeing' SEA theme, linked to its promotion of improved and accessible network of footpaths, enhancements to green infrastructure networks and safeguarding open space provision to encourage active lifestyles.
- 5.40 The Neighbourhood Plan will also bring positive effects in relation to the 'Landscape' and 'Historic Environment' SEA themes. These benefits largely relate to the Neighbourhood Plan's emphasis on protecting and enhancing the special qualities of the AONB, supporting the quality of the public realm, and through incorporating high-quality and sensitive design through new development proposals. Additionally, the Neighbourhood Plan will bring positive effects in relation to the 'Biodiversity' SEA theme through retaining habitats, enhancing ecological networks and delivering net gain. However, given the approaches taken forward through the

Neighbourhood Plan will help limit potential effects from new development areas rather than secure significant enhancements, these impacts are less likely to comprise significant positive effects overall.

- 5.41 Regarding the 'Climate Change' SEA theme, the Neighbourhood Plan will potentially lead to positive effects through policies and community aspirations which seek to address the climate crisis. However, this is dependent on the extent to which proposals incorporate mitigation and adaptation measures through design, along with the level of available funding and community support for such projects.
- 5.42 The Neighbourhood Plan will also initiate several beneficial approaches regarding the 'Transportation' SEA theme, given its focus on reducing traffic congestion, supporting modal shift towards sustainable transport options and by ensuring that new developments are accessible and provide appropriate access to local services and facilities. In relation to the 'Land, Soil and Water Resources' SEA theme, the Neighbourhood Plan will lead to the loss of relatively limited areas of land classified as the best and most versatile agricultural land. Otherwise, in relation to this SEA theme, the Neighbourhood Plan will initiate several beneficial approaches through the implementation of provisions which seek to maintain and enhance the quality of the waterways, drainage ditches and coastline of the parish. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

## 6. What are the next steps?

- 6.1 This Environmental Report accompanies the West Wittering Neighbourhood Plan for Regulation 14 consultation.
- 6.2 Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, and the Neighbourhood Plan and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Chichester District Council, for subsequent Independent Examination.
- 6.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.4 If the Independent Examination is favourable, West Wittering Neighbourhood Plan will be subject to a referendum, organised by Chichester District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, West Wittering Neighbourhood Plan will become part of the Development Plan for the parish.

# Appendix A Context Review and Baseline

## A1 – Air Quality

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- ‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’
- ‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.’
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>18</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25 year plan directly relate to the air quality SEA theme.

At the local level, Policy 39 ‘Transport, Accessibility and Parking’ within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the air quality SEA theme.

Implemented in 2015, the AQAP for Chichester District ‘Towards Better Air Quality’<sup>19</sup> outlines five priority actions for improving air quality across the district, including:

- Priority 1: Measure, model, and report on air quality;
- Priority 2: Strengthen partnerships, seek funds, pool resources and exploit synergies;
- Priority 3: Encourage low emission technology;
- Priority 4: Encourage and foster behavioural change/modal shift; and
- Priority 5: Be innovative, capitalise on opportunities and reduce emissions by 1%.

### Summary of Current Baseline

Chichester District Council is required to monitor air quality across the district under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO<sub>2</sub>), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

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<sup>18</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 20/02/19]

<sup>19</sup> Chichester District Council (2015): ‘Towards Better Air Quality: An AQAP for Chichester District (2015-2020)’ [online] available to access via: <<http://chichester.gov.uk/pollutioncontrolairquality>> last accessed [14/04/19]



The 2018 Air Quality Annual Status Report (ASR)<sup>20</sup> for Chichester confirms that there are three AQMAs within the district, designated primarily for exceedances in the national air quality objectives for nitrogen dioxide (NO<sub>2</sub>):

- Stockbridge roundabout at the junction with the A27 and A286;
- Orchard Street (A286), Chichester; and
- St Pancras (A286), Chichester

There are no AQMAs within the Neighbourhood Plan area. However, the ASR notes that the road network within the district is vulnerable to air pollution issues associated with congestion.

## Summary of Future Baseline

New housing and employment provision within the parish has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>, particularly along the main routes through the Neighbourhood Plan area.

Implementation of the aims, objectives and policies contained in the AQAP and the Local Transport Plan (further discussed in Chapter 10), along with the broad air quality mitigation measures for the European designated sites contained within the Habitats Regulation Assessment (HRA)<sup>21</sup> for the Chichester Local Plan Review, present opportunities to continue to improve air quality within both the Neighbourhood Plan area and the wider district.

## A2 – Biodiversity and Geodiversity

### Context Review

The Fourth Ramsar Strategic Plan<sup>22</sup> (2016-2024) aims to be congruent with the 2015 Sustainable Development Goals (SDGs) implemented by the United Nations, since wetlands contribute towards a very broad range of the aspirations set out in the SDGs. The vision for the plan is as follows, with three strategic goals and one operational goal seeking to achieve this vision: *‘Wetlands are conserved, widely used, restored and their benefits are recognised and valued by all’*

- Goal 1 (Strategic): Addressing the drivers of wetland loss and degradation;
- Goal 2 (Strategic): Effectively conserving and managing the Ramsar Site network;
- Goal 3 (Strategic): Wisely using all wetlands; and
- Goal 4 (Operational): Enhancing implementation.

At the European level, the EU Biodiversity Strategy<sup>23</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to *‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’*.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to ‘contribute to protecting and enhancing our natural, built and historic environment’ including by ‘helping to improve biodiversity.’
- ‘Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.’

<sup>20</sup> Chichester District Council (2018): ‘Air Quality ASR for Chichester District’, [online] available to access via: <<http://chichester.gov.uk/pollutioncontrolairquality>> last accessed [14/04/19]

<sup>21</sup> Chichester District Council (2018): ‘Habitat Regulations Assessment: Chichester Local Plan Review’, [online] available to access via: <<http://chichester.gov.uk/article/30928/Supporting-evidence---Local-Plan-review>> last accessed [23/04/19]

<sup>22</sup> Ramsar Convention (2016): ‘The Fourth Ramsar Strategic Plan 2016-2024’, [online] available to download via: <<http://www.ramsar.org/about/the-ramsar-convention-and-its-mission>> last accessed [13/04/19]

<sup>23</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <[http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf)> last accessed [27/06/18]

- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.’
- ‘To protect and enhance biodiversity and geodiversity, plans should:
  - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.*

The Natural Environment White Paper (NEWP)<sup>24</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK’s failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ aims to ‘*halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people*’<sup>25</sup>.

The recently published 25 Year Environment Plan<sup>26</sup> sets out the Government’s environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and

<sup>24</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [19/09/18]

<sup>25</sup> DEFRA (2011): ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’, [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [19/09/18]

<sup>26</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 19/09/18]

- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the biodiversity and geodiversity SEA theme.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the biodiversity and geodiversity SEA theme:

- Policy 48 'Natural Environment';
- Policy 49 'Biodiversity'; and
- Policy 50 'Development and Disturbance of Birds in Chichester and Langstone Harbours Special Protection Areas.

## Summary of Current Baseline

There are three European designated sites which partly overlap with the Neighbourhood Plan area: the Chichester and Langstone Harbours Ramsar Site and Special Protection Area (SPA), and the Solent Maritime Special Area of Conservation (SAC). The Bracklesham Bay Site of Special Scientific Interest (SSSI), Chichester Harbour SSSI and two Sites of Nature Conservation Interest (SNCI) are also located within the Neighbourhood Plan area, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). There are also three Local Nature Reserves (LNR) located within proximity to West Wittering. Additionally, the Neighbourhood Plan area contains a variety of ecologically important drainage ditches and Biodiversity Action Plan (BAP) Priority Habitats and Species, discussed below.

## European and Nationally designated sites

### Chichester and Langstone Harbours Ramsar Site and SPA

The Convention on Wetlands of International Importance (the Ramsar Convention) is the intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. The convention was adopted in 1971 and came into force in 1975, with the Chichester and Langstone Harbours Ramsar Site designated in January 1996. In the UK, the initial emphasis was on selecting sites of importance to waterbirds, and consequently, many Ramsar Sites were also designated as Special Protection Areas (SPA) under the European Birds Directive (79/409/EEC). The citation for the Chichester and Langstone Harbours<sup>27</sup> Ramsar Site and SPA lists the following species of international importance, many of which are listed within Article 4 of the European Birds Directive (79/409/EEC) and listed in Annex II of the European Habitats Directive (92/43/EEC). These species are the qualifying features for designating the site:

- Bar-tailed Godwit (*Limosta lapponica*)
- Brent Goose (*Branta bernicla*)
- Common Tern (*Sterna hirundo*)
- Curlew (*Numeris arquata*)
- Dunlin (*Calidris alpina*)
- Grey Plover (*Pluvialis squatarola*)
- Little Tern (*Sterna albifrons*)
- Pintail (*Anas acuta*)
- Red-breasted Merganser (*Mergus serrator*)
- Redshank (*Tringa totanus*)
- Ringed Plover (*Charadrius hiaticula*)
- Sanderling (*Calidris alba*)
- Sandwich Tern (*Sterna sandvicensis*)
- Shelduck (*Tadorna tadorna*)
- Shoveler (*Anas clypeata*)
- Teal (*Anas crecca*)
- Turnstone (*Arenaria interpres*)
- Wigeon (*Anas penelope*)

<sup>27</sup> Natural England (2014): 'Chichester and Langstone Harbours SPA Citation', [online] available to download via: <http://publications.naturalengland.org.uk/publication/5789102905491456> last accessed [04/04/17]

The European Site Conservation Objectives for the Chichester and Langstone Harbours Ramsar Site and SPA seek to maintain or restore<sup>28</sup>:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

### Solent Maritime SAC

The Solent Maritime SAC was designated in April 2005 and is approximately 11,300 ha in size. The SAC encompasses a major estuarine system on the south coast of England, with four coastal plain estuaries (Yar, Medina, King's Quay Shore and Hamble) and four bar-built estuaries (Newton Harbour, Beaulieu, Langstone Harbour and Chichester Harbour), with Chichester Harbour partly within the boundary of the Neighbourhood Plan area. The citation for the SAC lists the following habitats and species as the qualifying features for designation<sup>29</sup>:

Habitats:

- Annual vegetation of drift lines;
- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*);
- Coastal lagoons;
- Spartina swards (*Spartinion maritimae*) (Cord-grass swards);
- Estuaries;
- Mudflats and sandflats not covered by seawater at low tide. (Intertidal mudflats and sandflats);
- Perennial vegetation of stony banks. (Coastal shingle vegetation outside the reach of waves);
- *Salicornia* and other annuals colonising mud and sand. (Glasswort and other annuals colonising mud and sand);
- Sandbanks which are slightly covered by sea water all the time. (Subtidal sandbanks); and
- Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes). (Shifting dunes with marram)

Species:

- Desmoulin's whorl snail (*Vertigo moulinsiana*)

The European Site Conservation Objectives for the Solent Maritime SAC aim to ensure that the integrity of the site is maintained or restored as appropriate, and the site contributes to achieving the favourable conservation status of its qualifying features (listed above). These objectives are to maintain and restore the following<sup>30</sup>:

- Extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) or qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; and

<sup>28</sup> Natural England (2014): Chichester and Langstone Harbours SPA Conservation Objectives [online] available to download via: <<http://publications.naturalengland.org.uk/publication/5789102905491456>> last accessed [04/04/17]

<sup>29</sup> Natural England (2014): Solent Maritime SAC Citation', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/5762436174970880>> last accessed [04/04/17]

<sup>30</sup> Natural England (2014): Solent Maritime SAC Conservation Objectives', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/5762436174970880>> last accessed [04/04/17]

- The populations and distributions of qualifying species within the site.

Site Improvement Plans (SIPs) have been developed for each Natura 2000 site in England as part of the Improvement Programme for England's Natura 2000 sites (IPENS). Although the IPENS project closed in 2015, the Solent SIP<sup>31</sup> provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 sites within the Solent SIP boundary (covering four sites including the Chichester and Langstone Harbours Ramsar and SPA, and the Solent Maritime SAC). Additionally, the Solent SIP outlines the priority actions required to improve the condition of the sites, with timescales for a number of actions ongoing until 2020. Priority actions are grouped into seventeen categories, reflecting the issues faced by the Natura 2000 sites including (but not limited to): public disturbance, invasive species, water pollution and air pollution.

### Bracklesham Bay SSSI

Designated in February 1986 for its biological and geological interest, the Bracklesham Bay SSSI is approximately 200.6 ha and is located along the coastal boundary of the Neighbourhood Plan area. The site consists of a long stretch of coast with some rough unimproved grazing pastures which are important for the bird populations they support. This importance is elevated as agricultural improvement continues to threaten and erode a habitat-type already scarce within the county. The coastal habitats include a small area of salt marsh, shingle bank, the rifes (wide flowing ditches) and associated reed beds, together with a long stretch of intertidal exposures of high geological interest. The citation for the SSSI also states<sup>32</sup>:

Biological interest:

“The most important habitat in terms of size and wildlife interest is the area of unimproved pasture subject to seasonal flooding. Grasses such as red fescue *Festuca rubra*, sea couch (*Elymus pycnanthus*), creeping bent (*Agrostis stolonifera*) and sweet vernal-grass (*Anthoxanthum odoratum*) form a distinctive sward in which a variety of herbs grow, including viper's-bugloss (*Echium vulgare*), lady's bedstraw (*Galium verum*) and buck's-horn plantain (*Plantago coronopus*).”

“The areas of seasonally flooded grassland together with the rife and shingle banks are of considerable ornithological importance for both breeding and overwintering birds. Redshank (*Tringa tetanus*), ringed plover (*Charadrius hiaticula*), snipe (*Gallinago gallinago*) and lapwing (*Vanellus vanellus*) all breed here; the lapwing population on this site is of considerable significance in Sussex and may represent up to 10% of the total county population. Wintering birds include large flocks of brent geese (*Branta bernicla*), ruff (*Philomachus pugnax*) and golden plover (*Pluvialis apricaria*) with smaller numbers of teal (*Anas crecca*), pintail (*Anas acuta*), black-tailed godwits (*Limosa limosa*) and curlew (*Numenius arquata*). In addition, this site is probably the most important in Sussex for overwintering short-eared owls (*Asio flammeus*) and holds up to twelve individuals annually”.

Geological interest:

“The geological exposures on the beach between West Wittering and Selsey consist of a complex series of Eocene (Tertiary) age beds with some overlying younger Pleistocene (Quaternary) deposits. The Tertiary exposures are the type locality of the Bracklesham Beds or Group. These were deposited during a number of marine transgressions and regressions which resulted in a strongly cyclical stratigraphy”.

“In addition this is the only site among British Tertiary localities with plant fossils in rocks of the late lower and early middle Eocene, and it affords the only opportunity to study large beds of this age. At least sixteen horizons here are known to yield plant fossils including angiosperm fruits and seeds, coniferous leafy shoots, *Nipa* palm fruits and sea grass plants. The *Nipa* bed includes numerous scattered fruits which prove the proximity of the *Nipa*-dominated coastal mangrove vegetation at this time”.

“Bracklesham is a historically important Eocene fish site, known since about 1850, from which one hundred and sixty species have so far been described. Because of the long history of collecting at this

<sup>31</sup> Natural England (2014): 'Site Improvement Plan: Solent (SIP043)', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/4692013588938752>> last accessed [13/04/19]

<sup>32</sup> Natural England (no date): 'Bracklesham Bay SSSI', [online] available to access via: <<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1004079>> last accessed [14/04/19]

site it is the type locality for a great many species. Despite being an established and well-known Eocene fish site the locality has great potential for future research with much new and undescribed material still being discovered”.

Based on the most recently completed condition assessments undertaken in 2012 and 2014, 64.95% was classified as ‘favourable’ and 35.05% was classified as ‘unfavourable – recovering’.

### Chichester Harbour SSSI

Designated in July 1985, Chichester Harbour SSSI is approximately 3733.5 ha and shares overlapping designations with the Chichester and Langstone Harbours Ramsar and SPA, and the Solent Maritime SAC. The citation for the SSSI states<sup>33</sup>:

“Chichester Harbour is a large estuarine basin in which at low water extensive mud and sandflats are exposed, drained by channels which unite to make a common exit to the sea. The site is of particular significance for wintering wildfowl and waders and also breeding birds both within the Harbour and in the surrounding permanent pasture fields and woodlands. There is a wide range of habitats which have important plant communities.”

A number of condition assessments have been completed between 2009 and 2019, with 15.26% classified as ‘favourable’, 8.09% classified as ‘unfavourable – recovering’ and 76.64% classified as ‘unfavourable – no change’.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The whole of the Neighbourhood Plan area overlaps with a SSSI IRZ for residential, rural residential and rural non-residential development types.

### Locally important sites

Local Nature Reserves (LNRs) may be established by Local Authorities in consultation with English Nature under Section 21 of the National Parks and Access to the Countryside Act 1949 and are habitats of local importance. Although there are no LNRs located directly within the Neighbourhood Plan area, there are three located on the western side of the Chichester Harbour, namely:

- ‘Sandy Point’<sup>34</sup> LNR was designated in August 1994 and is a sensitive area of rare maritime heathland, sand dunes and grazed grassland. Much of the ground is covered in fragile lichens.
- ‘Nutbourne Marshes’<sup>35</sup> LNR was designated in January 1976 and is an area of saltmarsh and mudflats which provide habitats for migrating and breeding birds; and
- ‘Pilsey Island’<sup>36</sup> LNR was designated in January 1985 comprises a wide range of coastal habitats; intertidal sandflats and mudflats, fore dunes and yellow dunes, bare and vegetated shingle and saltmarsh. An impressive variety of unusual plants, spiders and insects exist on the reserve, thriving in the undisturbed habitats. The LNR is also a designated RSPB reserve.

There are two Sites of Nature Conservation Interest (SNCI) within the Neighbourhood Plan area, namely:

- ‘Redlands Meadow, Redlands Lane’ is located at the northern boundary of the Neighbourhood Plan area and is an area of wildflower-rich unimproved grassland; and
- ‘West Wittering Beach’ is located directly to the west of Bracklesham Bay SSSI and to the south of West Strand.

<sup>33</sup> Natural England (no date): ‘Chichester Harbour SSSI’, [online] available to access via:

<<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1003245>> last accessed [14/04/19]

<sup>34</sup> Natural England (no date): ‘Sandy Point LNR’, [online] available to access via:

<<https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009121>> last accessed [14/04/19]

<sup>35</sup> Natural England (no date): ‘Nutbourne Marshes LNR’ [online] available to access via:

<<https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009054>> last accessed [14/04/19]

<sup>36</sup> Natural England (no date): ‘Pilsey Island LNR’, [online] available to access via:

<<https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009073>> last accessed [14/04/19]

There are a variety of BAP Priority Habitats located within and/or adjacent to the Neighbourhood Plan area, including areas of coastal and floodplain grazing marsh, coastal saltmarsh, coastal sand dunes, coastal vegetation shingle, deciduous woodland, good quality semi-improved grassland, lowland dry acid grassland, lowland heathland, lowland meadows, maritime cliff and slopes, mudflats, purple moor grass and rush pasture, and traditional orchard.

Completed in 2015 and 2016 by the Manhood Wildlife and Heritage Group, the 'Fixing and Linking Our Wetlands' (FLOW) study analysed the drainage, biodiversity and environmental aspects of the network of ditches within the parish. In total, 255 ditches and waterways were surveyed, along with over 12km of hedgerows in the instances where they were associated with the ditch. Overall, most of the ditches were in 'good' or 'moderate' condition, with opportunities identified for improving the ecological value of the ditches through increasing vegetation diversity, creating new wetland areas and protecting the functionality of the hedgerows and margins as local wildlife corridors.

**Figure A2.1** below shows the designated wildlife sites and BAP priority habitats located within and adjacent to the Neighbourhood Plan area.

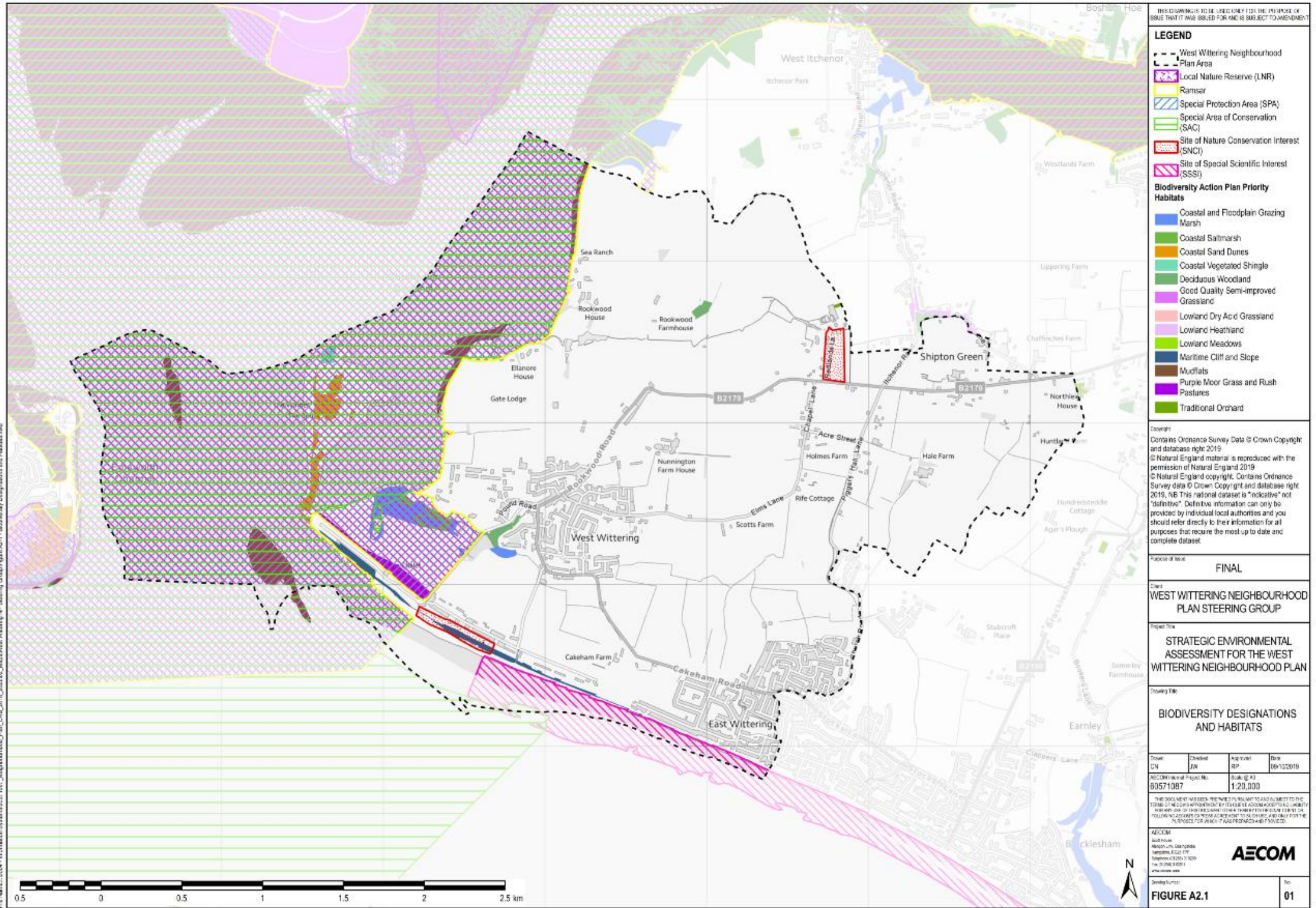
### Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.

The European protected sites are particularly sensitive to air quality issues, water quality issues, coastal squeeze, loss of functionally linked supporting habitats for birds, and recreational pressures. In regards to air quality, exceeding critical values for air pollutants may result in changes to the chemical status of habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats. Additionally, the nature, scale, timing and duration of some human activities can result in the disturbance of birds (i.e. – the notifying features of the European protected sites within the Neighbourhood Plan area) at a level that may substantially affect their behaviour, and consequently affect the long-term viability of their populations.

File Name: I:\2024 - Information Systems\25271057\_NightWittering\_Plan\_CDR\_2019\_202200\_Maps\Map\Wittering\_MP Steering Group\Figures\A2.1 - Biodiversity Designations and Habitats.mxd



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**LEGEND**

- West Wittering Neighbourhood Plan Area
- Local Nature Reserve (LNR)
- Ramsar
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Site of Nature Conservation Interest (SNCI)
- Site of Special Scientific Interest (SSSI)

**Biodiversity Action Plan Priority Habitats**

- Coastal and Floodplain Grazing Marsh
- Coastal Saltmarsh
- Coastal Sand Dunes
- Coastal Vegetated Shingle
- Deciduous Woodland
- Good Quality Semi-Improved Grassland
- Lowland Dry Acid Grassland
- Lowland Heathland
- Lowland Meadows
- Maritime Cliff and Slope
- Mudflats
- Purple Moor Grass and Rush Pastures
- Traditional Orchard

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Package of issue: **FINAL**

Client: **WEST WITTERING NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE WEST WITTERING NEIGHBOURHOOD PLAN**

Drawing Title: **BIODIVERSITY DESIGNATIONS AND HABITATS**

Drawn	Checked	Approved	Date
DN	JW	RP	08/12/2019

ACCUM Internal Project No: **80571087** Scale: **1:20,000**

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## A3 – Climate Change

### Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>37</sup> :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act<sup>38</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page 39.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience;

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<sup>37</sup> GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [20/09/18]

<sup>38</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

<sup>39</sup> Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed [19/09/18]

encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.’

- ‘Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.’
- ‘Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.’
- Direct development away from areas at highest risk of flooding (whether existing or future). ‘Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.’

The Flood and Water Management Act<sup>40</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).<sup>41</sup>

Further guidance is provided in the document ‘Planning for SuDS’.<sup>42</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of ‘contributing to local quality of life and green infrastructure’.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the climate change SEA theme:

- Policy 40 ‘Sustainable Design and Construction’;
- Policy 41 ‘Off-site Renewable Energy’; and
- Policy 42 ‘Flood and Water Management’

## Summary of Current Baseline

### Contribution to climate change

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Chichester has higher per capita emissions than West Sussex but is broadly in line with per capita emissions covering the South East of England and England since 2005.

Chichester has seen a 33.7% reduction in the percentage of total emissions per capita between 2005 and 2016, lower than the reductions for West Sussex (36.6%), the South East of England (36.7%) and England (37.6%)<sup>43</sup>.

<sup>40</sup> Flood and Water Management Act (2010) [online] available at: <<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [19/09/18]

<sup>41</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

<sup>42</sup> CIRIA (2010) ‘Planning for SuDS – making it happen’ [online] available to access via <[http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx)> last accessed [19/09/18]

<sup>43</sup> Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO2 emissions – data tables [online] available at: <<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>> [accessed 12/04/19]

## Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team<sup>44</sup>. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50<sup>th</sup> percentile) for South East England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows<sup>45</sup>:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +20 to +30% in winter and -20% to -30% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

<sup>44</sup> The data was released on 26<sup>th</sup> November 2018: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [12/04/19]

<sup>45</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <<https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>> last accessed [12/04/19]

## Flood risk

The areas at highest risk of flooding in the Neighbourhood Plan area are beaches, mudflats and dunes in close proximity to Chichester Harbour and Bracklesham Bay, as well as areas surrounding streams that feed into the Harbour. These areas are in Flood Zone 3, representing areas that have a 1% (1 in 100) or greater annual flood risk. Completed in 2008, the Strategic Flood Risk Assessment (SFRA) for Chichester highlights that these areas are within Flood Zone 3a, which have a high probability of flooding<sup>46</sup>.

The West Sussex Local Flood Risk Management Strategy gives an overview of sources of flooding in the West Sussex area<sup>47</sup>. In the Chichester District the sources of flood risk are surface water and coastal flooding. West Wittering is a 'Wet Spot' area, with an estimated 56 properties at risk from surface water or coastal flooding, rising to an estimated 170 properties at risk in the next 100 years<sup>48</sup>.

Surface water flooding is a risk within the Neighbourhood Plan area, with a low-to-medium risk of flooding to the Snow Hill area and a medium-to-high risk along Coastguard Lane, as well as Rookwood Lane (north of West Wittering), where streams run parallel to the road<sup>49</sup>.

With regards to drainage in the Neighbourhood Plan area, the results of the FLOW study (previously discussed within Chapter 3) indicate a variety of opportunities for flood relief and water storage (primarily within the 'Sheepwash Lane' drainage system) including:

- Removing culverts at certain locations in order to open up ditches;
- Widening and deepening ditches at certain locations in order to create new ponds; and
- Adding blockages to ditches at certain locations in order to hold back water and slow flow.

## Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

## A4 – Landscape

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'

<sup>46</sup> Chichester District Council (2008): 'SFRA Volume II: Technical Report', [online] available to access via: <<http://chichester.gov.uk/studies>> last accessed [15/04/19]

<sup>47</sup> West Sussex County Council (2014) 'West Sussex Local Flood Risk Management Strategy (2013-2018)', [online] available at: <[https://www.westsussex.gov.uk/media/1595/local\\_flood\\_risk\\_management\\_strategy.pdf](https://www.westsussex.gov.uk/media/1595/local_flood_risk_management_strategy.pdf)> [accessed 15/04/19]

<sup>48</sup> West Wittering Parish Council (2010) 'West Wittering Flood Action Group Announcement', [online] available at: <<http://www.westwitteringparishcouncil.gov.uk/news/west-wittering-flood-action-group-announcement>> [accessed 15/04/19]

<sup>49</sup> GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> [accessed 12/04/19]

- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’
- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - i. *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
  - ii. *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
  - iii. *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*’

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the landscape SEA theme.

Chichester Harbour Conservancy and its partners have, since 1971, evolved a series of concepts to guide their management of Chichester Harbour Area of Outstanding Natural Beauty (AONB). The key concepts listed below provide a framework to underpin the policies and actions contained within the Chichester Harbour AONB Management Plan<sup>50</sup> 2014-19:

- Protecting and improving the special qualities of the AONB;
- Sustainability and wise use;
- Increasing knowledge and understanding;
- Helping people to enjoy the AONB;
- Supporting sustainable development; and
- Working in partnership.

It is important to note that the draft version of the 2019-2024 AONB Management Plan recently underwent public consultation. Responses are currently being reviewed and considered, with the final adopted Plan expected in April 2019.

Adopted in May 2017, the Joint Chichester Harbour AONB Supplementary Planning Document provides guidance for development proposals in the AONB and is a material consideration when assessing planning applications. The Neighbourhood Plan area is within the ‘Manhood Peninsula: West Wittering’ section of the SPD, with the following key issues noted<sup>51</sup>:

- There is pressure for redevelopment of larger and older shore side housing;
- Development in the historic village cores should respond to local character, existing settlement patterns, locally distinctive styles and materials;
- The wooded setting of larger houses should be conserved and enhanced.
- The loss of trees and hedges should be avoided;
- Try to ensure that historic character is not ‘diluted’ by uncharacteristic new development;
- Conservation of the historic village character is essential; and
- Massing and roofscapes should be carefully designed to minimise visual impact.

<sup>50</sup> Chichester Harbour Conservancy (2014): ‘Chichester Harbour AONB Management Plan’, [online] available to access via: <<https://www.conservancy.co.uk/page/management-plan/307>> last accessed [15/04/19]

<sup>51</sup> Chichester District Council (2017): ‘Adopted Joint Chichester Harbour AONB SPD’, [online] available to access via: <<http://chichester.gov.uk/article/29757/Supplementary-planning-documents-and-policy-guidance>> last accessed [15/04/19]

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the landscape SEA theme:

- Policy 43 'Chichester Harbour AONB';
- Policy 44 'Development around the Coast'; and
- Policy 45 'Development in the Countryside'.

## Summary of Current Baseline

### National Character Areas

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within the 'South Coast Plain' NCA, a narrow strip running along the Hampshire and Sussex coast from the edge of Southampton in the west to Brighton and Hove in the east. The NCA profile for the 'South Coast Plain'<sup>52</sup> lists several key characteristics, with the following of particular relevance to the Neighbourhood Plan area:

- The plain slopes gently southwards towards the coast. From the coastal plain edge there are long views towards the sea and the Isle of Wight and beyond;
- The underlying geology of flinty marine and valley gravels extends for several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high-quality soils;
- Coastal inlets and 'harbours' contain a diverse landscape of narrow tidal creeks, mudflats, shingle beaches, dunes, grazing marshes and paddocks. These include the internationally important Chichester, Langstone and Portsmouth Harbour;
- Sand dune grasses and intertidal marsh communities are characteristic of the coastline, while small areas of species-rich meadow remain inland;
- The coastline provides feeding grounds for internationally protected populations of overwintering waders and wildfowl and is also extensively used for recreation; and
- Along the exposed, open coastal plain and shoreline, tree cover is limited to isolated wind-sculpted woodlands and shelterbelts.

### Chichester Harbour Area of Outstanding Natural Beauty (AONB)

An area of outstanding natural beauty (AONB) is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty. Overlapping with the western section of the Neighbourhood Plan area, the Chichester Harbour AONB was designated in 1964 in recognition of its beautiful land and seascape. Chichester Harbour Conservancy describe the AONB as follows<sup>53</sup>:

*"The Harbour's coastline is characterised by distinctive tidal channels leading to a maze of inlets and rithes that criss-cross expanses of saltmarsh and mudflats. The shoreline is fringed by wind-sculpted oaks and scrub, with open agricultural fields bounded by hedgerows. Historic coastal villages are defined by centuries of maritime association, and in the flat landscape, the vertical elements of church spires and old mills are an important part of its character."*

*"The landscape character is shaped by the patterns of sea and land changing with the tide, weather and seasons. The dynamic landscape is constantly changing in response to natural processes and human activities. Agriculture has developed; settlements have changed in both their appearance and*

<sup>52</sup> Natural England (2014): 'NCA Profile: 126 South Coast Plain (NE525)', [online] available to download via:

<<http://publications.naturalengland.org.uk/publication/4923911250640896?category=587130>> last accessed [29/03/17]

<sup>53</sup> Chichester Harbour Conservancy (2019): 'Landscape of the Chichester Harbour AONB'. [online] available to access via: <<https://www.conservancy.co.uk/page/landscape>> last accessed [15/04/19]

*extent; roads and traffic have increased, and the industries associated with the Harbour have changed.”*

The AONB Management Plan (2014-2019) outlines the following ten special qualities of Chichester Harbour:

- The unique blend of land and sea – especially the combination of large open water areas, narrow inlets and intimate creeks;
- The frequently wooded shoreline;
- The flatness of the landform, unusual amongst AONBs, accentuates the significance of sea and tide and of distant landmarks across land and water;
- The open water of the central area of the Harbour;
- An overall sense of wilderness within the seascape;
- Particularly strong historic character and associations;
- Picturesque harbourside settlements;
- Wealth of flora and fauna, notably the vast flocks of wading birds, adds to the richness and diversity of the landscape;
- The unspoilt character and unobtrusive beauty; and
- The Harbour offers a very special sense of peace and tranquillity; largely endangered by the gentle way it is used and the closeness to nature that is experienced.

### Landscape character

The West Sussex Landscape Character Assessment (LCA)<sup>54</sup> describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Chichester. Additionally, it also sets out strategies and guidelines for the protection, management and planning of the landscape. The Neighbourhood Plan area contains two LCAs, described below:

SC1 South Coast Shoreline LCA' is located along the coastal boundary of the Neighbourhood Plan area, extending eastwards along West Wittering Beach and around the Manhood Peninsula. It is a distinctively low, open and exposed landscape which has an overriding visual and physical association with the sea. Its key characteristics are linked by coastal evolution, weather and tides, and varies considerably through seasonal changes. The land management guidelines for this LCA goes onto state that the landscape has a high sensitivity to change due to its openness and high intervisibility created by the wide curving bays. Key sensitivities include<sup>55</sup>:

- Erosion of coastal habitats due to visitor pressure and natural processes;
- Unsympathetic urban development;
- Loss of open views;
- Rise in sea level;
- Recreational development such as car parks and caravan sites;
- Car-borne summer holiday traffic reducing tranquillity; and
- Potential for dramatic landscape and ecological change due to dynamic movement along the coast, which also affects the entrance to Chichester Harbour.

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<sup>54</sup> West Sussex County Council (2003): 'Landscape Character Assessment of West Sussex', [online] available to access via: <<https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/>> last accessed [16/04/19]

<sup>55</sup> West Sussex County Council (2003): 'Land Management Guidelines for SD1: South Coast Shoreline LCA', [online] available to access via: <<https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/>> last accessed [16/04/19]

SC3 'Chichester Harbour LCA' covers the sections of Neighbourhood Plan area located away from the coastline. When approaching Chichester Harbour by land, the sight of masts glimpsed through the fields creates a sense of anticipation of the coastal edge. Whilst traffic and recreational activities reduce tranquillity in some parts, there are also significant areas of the LCA which have tranquil character, retaining a sense of remoteness. Settlement character of the area is mixed, with both traditional harbourside settlements and villages contrasting with more recently developed holiday and residential estates. The land management guidelines for this LCA goes onto list the following key landscape sensitivities<sup>56</sup>:

- Increasing noise due to traffic and recreational activity eroding tranquillity;
- Inappropriate harbourside development;
- Coastal strand line litter;
- Seasonal and weekend visitor pressure;
- Relationship of views between the harbour and surrounding hinterland; and
- Managed retreat of the coastline may be particularly influential in the future, providing opportunities for creation of new coastal and inter-tidal habitats, and could result in a more naturally functioning landscape.

### Settlement Pattern Character Areas

At the local level, the West Wittering Village Design Statement (VDS) defines six Settlement Pattern Character Areas within the Neighbourhood Plan area. A summary of their character is provided in the subsequent paragraphs and is taken from the VDS<sup>57</sup>.

- Area 1 'Central Conservation': The West Wittering conservation area is notable for its attractive village centre, with the church, the school and its playing field and assorted listed cottages and houses, all being linked by the curving Pound Road. A well-tended churchyard and many mature trees frame the church. The village green sits at the north east end of this road with an area of trees and shrubbery concealing the stream and the remains of the village ponds. Henry Royce's Studio sits at right angles to Rookwood Road, just before the village green, and is an important landmark.
- Area 2 'South West': The South West Area is (except for some of Cakeham Road) made up of private estates. Approximately half the houses in this area adjoin fields or greensward and enjoy the benefit of undisturbed views over farmland, (some of which forms the important strategic gap between the two parts of the village) and/or the seascape including Chichester Harbour, Selsey Bill, Portsmouth and the Isle of Wight. The 'green lung' effect is very much in evidence in this area. Most of the properties carry restrictive covenants.
- Area 3 'South East Marine': The South East Marine settlement area, located on the eastern side of the village (south of Cakeham Road/west of Shore Road & Russell Road) is, in part, an eclectic mix of residences or, alternatively, roads of very similar bungalows. Many of the small, original, properties have been redeveloped or renovated over the years, creating an uneven mix of size, height and structure, and with some areas appearing overcrowded. Some of the older roads have managed to retain their original character and charm. There is good pedestrian access to shops, local amenities and the beach via pavements and "twittens".
- Area 4 'South East Inland': This area includes the avenues and roads to the North of Cakeham Road/ Northern Crescent and the west of Church Road. The development of this area began in the 1970s and continues to this day.
- Area 5 'Northern': This section deals with the housing developments north of Elms Lane, the northern part of the Wells Farm Estate, north east of Rookwood Road, the open spaces surrounding the two caravan parks and the Maltheuses Cottages. Most of the development in this area dates from the 1970's with a small number of older properties. The northern part of

<sup>56</sup> West Sussex County Council (2003): 'Land Management Guidelines for SD3: Chichester Harbour LCA', [online] available to access via: <<https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/landscape-character-assessment-of-west-sussex/>> last accessed [16/04/19]

<sup>57</sup> West Wittering Parish Council (2006): 'West Wittering Village Design Statement', [online] available to access via: <<http://www.chichester.gov.uk/article/24651/Village-Design-Statements>> last accessed [16/04/19]



Wells Farm abuts the Strategic Gap or 'Green Lung' on its eastern boundary. The area to the north east of Rookwood Road is part of the AONB; and

- Area 6 'Outlying': The outlying area covers properties not included in the previous settlements and which are often farms, large rural houses and pockets of rural development. West Wittering Car Park is also included in this area. Apart from Cakeham Manor and the commercial buildings on West Wittering Estate, the properties are to the north of the main settlements, in the large area of active farming land in the Parish. Many are situated along the B2179, a very busy approach road to the village, or are along lanes and tracks branching off from this road. There is also a ribbon of commerce along the B2179. Several well screened caravan parks and pockets of light industry, often in converted farm buildings or new builds made to look like farm buildings, feature in the area.

Additionally, it is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change can see these views degraded overtime.

**Figure A4.1** (overleaf) shows the landscape designations within the Neighbourhood Plan area.

### Tree Preservation Orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity; the local planning authority will likely take into consideration the following criteria<sup>58</sup>:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

In this context, Chichester District Council have allocated several TPOs within the Neighbourhood Plan area<sup>59</sup>.

### Summary of Future Baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the Settlement Pattern Character Areas which define the Neighbourhood Plan area, along with the special qualities of the AONB.

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<sup>58</sup> GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>> last accessed [16/04/19]

<sup>59</sup> Chichester District Council (2018): 'My Chichester District Mapping', [online] available to access via: <<http://mydistrict.chichester.gov.uk/mycdc.aspx>> last accessed [14/04/19]



## A5 – Historic Environment

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘*positive strategy*’ for the ‘*conservation and enjoyment of the historic environment*’, including those heritage assets that are most at risk.
- ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.’

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the historic environment SEA theme.

The Government’s Statement on the Historic Environment for England<sup>60</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Historic England is the statutory body that helps people care for, enjoy and celebrate England’s spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)<sup>61</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>62</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

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<sup>60</sup> HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: <[http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [20/0918]

<sup>61</sup> Historic England (2016): ‘Conservation Area Designation, Appraisal and Management: Advice Note 1’, [online] available to download via: <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [11/12/18]

<sup>62</sup> Historic England (2016): ‘SA and SEA: Advice Note 8’ [online] available to download via: <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [11/12/18]

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2<sup>nd</sup> Edition) (December 2017)<sup>63</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>64</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the historic environment SEA theme:

- Policy 46 'Alterations, Change of Use and/or Re-use of Existing Buildings in the Countryside; and
- Policy 47 'Heritage and Design'.

## Summary of Current Baseline

### Historic Evolution of West Wittering

Completed in September 2006, the Character Area Appraisal for West Wittering outlines the historical evolution of the parish, summarised below<sup>65</sup>:

"West Wittering is an early Saxon settlement located close to the entrance to Chichester Harbour. A *monasterium* was apparently established in c. AD 740. The name comes from the early English *Wihthere*, and both East and West Wittering in early times were called *Withthringe*.

"Following the Norman Conquest, the English church underwent a radical reorganisation and in 1075 the see (the bishop's seat) was transferred from Selsey to Chichester. Soon after the construction of the first phase of St Peter and St Paul's Church began, of which some 11th century stonework remains in the church nave wall. Further additions were made in the 12th century (nave and south aisle) and in the 13th century (chancel, tower and chapel), when the Bishops of Chichester also built themselves a palace at nearby Cakeham, now called Cakeham Manor House.

"Until the mid-20th century the West Wittering area remained a rural backwater despite proposals for a West Wittering Harbour Reclamation scheme in the 1930s, which were never implemented. The village became a favoured retreat for the more well-to-do, and a famous resident was Henry Royce, who moved to West Wittering in 1917 and remained there until his death in 1933. It was at his home called Elmstead, in Elms Lane, that the famous Rolls Royce engine was first discussed, and he also used a studio in Rookwood Lane which also remains.

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<sup>63</sup> Historic England (2017): 'Setting of Heritage Assets: 2<sup>nd</sup> Edition', [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [11/12/18]

<sup>64</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to download via: <<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [11/12/18]

<sup>65</sup> Chichester District Council (2006): 'West Wittering Conservation Area Appraisal: Historic Development and Archaeology', [online] available to access via: <<http://chichester.gov.uk/article/24659/conservation-area-character-appraisals>> last accessed [13/04/19]

“The first holiday camps appeared in the late 1930s and the map of 1938 shows the beginning of the Roman Landing Estate to the north of the village, and the development of new housing along Seaward Drive to the south. A Memorial Hall was added in 1922 to serve the ever-increasing population. However, it was the rapid developments of the 1960s which brought the greatest change to the area as more new houses were built, including the infilling of much of Elms Lane, and the economic prosperity of the area became more dependent on the provision of holiday accommodation and associated facilities.

“Today the historic village core is largely surrounded by this more modern development, which is fortunately relatively unobtrusive apart from the caravan site close to the church. In 1966 the National Trust took over the management of East Head and with the help of volunteers and the Chichester Harbour Conservancy, the further erosion of this part of the entrance to Chichester Harbour has been prevented. The West Wittering Estate own and manage large swathes of land including the access road and car park to the main beach”.

### Designated Heritage Assets

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains one Grade I, one Grade II\* and 27 Grade II nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. The Grade I and II\* listed buildings are as follows:

- The Parish Church of St Peter and St Paul (Grade I); and
- Cakeham Manor (Grade II\*)

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England<sup>66</sup>, there is one scheduled monument within the Neighbourhood Plan area, namely: ‘Cakeham Manor (uninhabited parts)’.

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area’s special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the ‘Conservation Area Designation, Appraisal and Management’ advice note by Historic England<sup>67</sup>. Ideally, appraisals should be regularly reviewed as part of the management of the conservation area and can be developed into a management plan.

In this context, the West Wittering Conservation Area covers the village centre and was designated in September 2006. The appraisal states that the most important character area (Pound Road) contains the highest concentration of listed buildings and is focused on the church. The second character area (Rookwood Road) contains a mixture of historic and modern properties. The third (Elms Lane), a high concentration of modern buildings with a few, high quality historic buildings all linked by attractive hedging and trees. The fourth (Cakeham Road) is more dispersed, with a number of good quality 19<sup>th</sup> or 20<sup>th</sup> century buildings.

The conservation area appraisal also outlines several significant features and management proposals to protect and enhance its special qualities, outlined below<sup>68</sup>.

Significant features:

- Well preserved rural village located slightly inland from the sea;
- Pound Road is the principal street and connects the church to the village green;

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<sup>66</sup> Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [20/09/2018]

<sup>67</sup> Historic England (2016): ‘Conservation Area Designation, Appraisal and Management Advice Note 1’, [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [20/09/18]

<sup>68</sup> Chichester District Council (2006): ‘West Wittering Conservation Area: Character Appraisals and Management Proposals’, [online] available to access via: <<http://chichester.gov.uk/article/24659/conservation-area-character-appraisals>> last accessed [13/04/19]

- St Peter and St Paul's Church, dating to the 11th century, and listed Grade I;
- Survival of a 17th century cottage;
- Collection of 18th and 19th century listed buildings along Pound Road and Rookwood Road;
- Elmstead, Elms Lane, the home between 1917 and 1933 of Sir Henry Royce of Rolls Royce;
- Farm buildings in Elms Lane with thatched roofs;
- Proximity to Cakeham Manor House, with its 13th century undercroft; and
- Wide variety of materials: thatch, handmade clay peg tiles for roofs and walls, flint – both as cobbles and knapped, red brick, white painted stone or render, some Mixen stone, some imported limestone on the church.

#### Management proposals:

- Parking – monitoring to determine whether seasonal parking begins to create difficulties for local residents;
- All new development to follow the 'good practice guidance' in appendix 3 of the Appraisal; and
- Revisions to the conservation area boundary.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2018 Heritage at Risk Register for the South East, none of the designated heritage assets in the Neighbourhood Plan area are at risk<sup>69</sup>.

However, it is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the 27 Grade II listed buildings within the Neighbourhood Plan are at risk.

**Figure 5.1** (above) shows the location of the scheduled monuments, listed buildings and conservation area within the Neighbourhood Plan area.

### Locally important Heritage Features

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people.

Following a high-level review of the Historic Environmental Record (HER) for West Sussex (accessed via the Heritage Gateway)<sup>70</sup>, there are 45 records within West Wittering Parish including a number of Neolithic sites, Roman artefacts, medieval and post-medieval field systems, Bronze Age and Palaeolithic finds, and the following distinctive buildings:

- Coastguard Station;
- Tileworks, Chapel Lane;
- Watch House – Chichester Harbour; and
- Wittering Signal House.

### Summary of Future Baseline

6.5 New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It

<sup>69</sup> Historic England (2018): 'Heritage at Risk Register for the South East' [online] available to download via: <https://historicengland.org.uk/images-books/publications/har-2018-registers/> last accessed [11/04/19]

<sup>70</sup> Heritage Gateway (2019): 'Historic Environmental Record for West Sussex', [online] available to access via: <http://www.heritagegateway.org.uk/gateway/> last accessed [13/04/19]

should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

- 6.6 Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

## A6 – Land, Soil and Water Resources

### Context Review

The EU's Soil Thematic Strategy<sup>71</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Completed in December 2015, the updated South East River Basin District Management Plan<sup>72</sup> sets out the current state of the water environment, the pressures facing the water environment, the environmental objectives for protecting and improving the waters, a programme of measures and actions needs to achieve the objectives, and the progress since the 2009 plan.

Key messages from the NPPF include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
  - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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.'

<sup>71</sup> European Commission (2006) Soil Thematic Policy [online] available at: <[http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)> last accessed [29/06/18]

<sup>72</sup> DEFRA & Environment Agency (2015): 'South East River Basin Management Plan (Part 1)', [online] available to access via: <<https://www.gov.uk/government/publications/south-east-river-basin-district-river-basin-management-plan>> last accessed [14/04/19]

- ‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the land, soil and water resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>73</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>74</sup>, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England<sup>75</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

In terms of waste management, the Government Review of Waste Policy in England<sup>76</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The National Waste Management Plan<sup>77</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>78</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the historic environment SEA theme:

- Policy 40 ‘Sustainable Design and Construction’
- Policy 42 ‘Flood Risk and Water Management’; and
- Policy 53 ‘District Canals’.

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<sup>73</sup> Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [20/09/18]

<sup>74</sup> Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [20/09/18]

<sup>75</sup> Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [20/09/18]

<sup>76</sup> DEFRA (2011) Government Review of Waste Policy in England [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69401/pb13540-waste-policy-review110614.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf) [accessed 01/03/19]

<sup>77</sup> DEFRA (2013) Waste Management Plan for England [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf) [accessed 01/03/19]

<sup>78</sup> Directive 2008/98/EC



## Summary of Current Baseline

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, a detailed classification has only been undertaken on a small area of land within the eastern section of the Neighbourhood Plan area, namely: an area of Grade 3a agricultural land within East Wittering village.

The Provisional Agricultural Land Quality dataset<sup>79</sup> shows that the northern section of the Neighbourhood Plan area is predominantly underlain by Grade 2 (very good) agricultural land, and the southern section is underlain by Grade 3 (good to moderate) agricultural land. However, for land classified as Grade 3 land, without the subset grading (3a or 3b) it is not possible to tell at this stage whether all the agricultural land is considered to be 'best and most versatile'.

It is also important to note that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

### Water resources

There is a network of small streams and ditches which pass through West Wittering.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the Neighbourhood Plan area is within the 'Broad Rifer to Chichester Harbour' Surface Water NVZ. However, it is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to increase the risk of pollution to the NVZ.

### Water quality

West Wittering is located within the South East River Basin District, overlapping two management catchments, namely: the 'Arun and Western Streams' (covering the built environment within the Neighbourhood Plan area) and the 'South East Transitional and Coastal Water (TraC)' (covering the marine environment within the Neighbourhood Plan area).

Regarding the built environment, none of the waterbodies within the 'Arun and Western Streams' management catchment pass through the Neighbourhood Plan area. Comparatively, the 'South East TraC' management catchment contains four waterbodies, with the 'Chichester Harbour'<sup>80</sup> waterbody within the Neighbourhood Plan area.

Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer<sup>81</sup> classifies the Chichester Harbour as having a 'good' chemical status and a 'moderate' ecological status. The RNAGs are primarily attributed to the following activities: sewage discharge, poor nutrient management and coastal background dissolved inorganic nitrogen.

### Mineral resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties.

<sup>79</sup> Natural England (2018) Agricultural Land Classification map London and the South East (ALC007) [online] available at <<http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>> last accessed [13/04/19]

<sup>80</sup> Environment Agency (2019): 'Chichester Harbour', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB580705210000>> last accessed [13/04/19]

<sup>81</sup> Environment Agency (2019): 'Catchment Data Explorer', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/>> [accessed 09/04/19]

They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>82</sup>.

Adopted in July 2018, the Joint Minerals Local Plan<sup>83</sup> covers the period to 2033 and provides the basis for making consistent decisions about planning applications for mineral activities throughout the county. Appendix E confirms the location of the five mineral safeguarding areas (MSAs) throughout West Sussex, which includes: Sharp Sand and Gravel, Soft Sand (including potential Silica Sand), Brick Clay Resource, Chalk, and Building Stone, none of which overlap with the boundaries of the Neighbourhood Plan area.

## Summary of Future Baseline

Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

In the absence of a detailed Agricultural Land Classification assessment for most of West Wittering, it remains uncertain whether new development in the Neighbourhood Plan area will lead to losses of higher quality (best and most versatile) agricultural land.

## A7 – Population and Community

### Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.

<sup>82</sup> GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <<https://www.gov.uk/guidance/minerals>> last accessed [11/03/19]

<sup>83</sup> West Sussex County Council (2018): 'Joint Minerals Local Plan', [online] available to access via: <<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/>> last accessed [15/04/19]

- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>84</sup> warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

At the local level, Policies 1-7 and 26-38 within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the population and community SEA theme, with the following policies of relevance to the Neighbourhood Plan area:

- Policy 1 'Presumption in Favour of Sustainable Development';
- Policy 2 'Development Strategy and Settlement Hierarchy';
- Policy 5 'Parish Housing Sites 2012-2029';
- Policy 6 'Neighbourhood Development Plans';
- Policy 26 'Existing Employment Sites';
- Policy 29 'Settlement Hubs and Village Centres';
- Policy 30 'Built Tourist and Leisure Development';
- Policy 31 'Caravan and Camping Sites';
- Policy 33 'New Residential Development';
- Policy 34 'Affordable Housing'; and
- Policy 38 'Local and Community Facilities'.

## Summary of Current Baseline

### Population

The population of the Neighbourhood Plan area increased at a lower percentage between 2001 and 2011 in comparison to observed increases for Chichester, the South East and England. Approximately 2.37% of the population of Chichester District live within the boundaries of the Neighbourhood Plan area<sup>85</sup>.

### Age structure

Generally, there are a higher proportion of residents within the 60+ age category in the Neighbourhood Plan area in comparison to the percentages for Chichester, the South East and England. In contrast, there are fewer residents within the younger age categories (0-16 and 16-24) in the Neighbourhood Plan area in comparison to the regional and national trends.

<sup>84</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [21/09/18]

<sup>85</sup> ONS (no date): Census 2011: Population Density 2011 (Table UV102EW); Population Density 2001 (Table UV02)

In regards to the working age categories (25-44 and 45-59) the total for the Neighbourhood Plan area (32.6%) is nearly 10% lower than the total for Chichester (41.6%), and over 10% lower than the totals for the South East (46.4%) and England (46.9%)<sup>86</sup>.

### Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long-term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Based on the information presented in Table 8.3 (overleaf), a greater percentage of households are deprived within the Neighbourhood Plan area (58.4%) in comparison to the totals for Chichester (51.4%), the South East (52.3%). However, the total for the Neighbourhood Plan area broadly aligns to the national trend (57.5%).

Out of the 58.4% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in either one or two dimensions, similar to the regional and national trends<sup>87</sup>.

### Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - a. 'Geographical Barriers': relating to the physical proximity of local services
  - b. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - c. 'Indoors Living Environment' measures the quality of housing.
  - d. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

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<sup>86</sup> ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

<sup>87</sup> ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

1. Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
2. Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>88</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The Neighbourhood Plan area overlaps with the two LSOAs, namely: Chichester 013E (which includes West Wittering village) and Chichester 013F (which includes the areas of East Wittering village which are within the Neighbourhood Plan area). Although both LSOAs are amongst the top 40% least deprived LSOAs in England, there is a noticeable difference between the 'Barriers to Housing and Services' domain. In this regard, Chichester 013E is within the top 20% most deprived decile whereas Chichester 013F is within the top 10% least deprived decile.

### Housing tenure

Within the Neighbourhood Plan area, 80.9% of residents either own their home outright or with a mortgage, higher than the regional and national trends. There are fewer residents within privately rented and socially rented accommodation in the Neighbourhood Plan area in comparison to the regional and national totals. Comparatively, the total percentage of residents within shared ownership accommodation or living rent free within the Neighbourhood Plan area (2.7%) is comparable to the total for Chichester (3.1%), the South East (2.4%) and England (2.1%)<sup>89</sup>.

### Education

Based on the 2011 census data, 15.9% of residents in the Neighbourhood Plan area have no qualifications, lower than the totals for Chichester (17.2%), the South East (19.1%) and England (22.5%). Comparatively a higher percentage of residents in the Neighbourhood Plan area have a Level 4 qualification and above (35.5%) in comparison to the South East (29.9%) and England (27.4%), but broadly aligns to the total for Chichester (34.3%). Therefore, the Neighbourhood Plan area has a highly qualified working population<sup>90</sup>.

### Employment

Regarding employment within the Neighbourhood Plan area, the following three occupation categories support the most residents<sup>91</sup>:

- Managers, directors and senior officials (17.6%);
- Professional occupations (16.2%); and
- Skilled trades occupations (13.7%).

Overall, 47.5% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, higher than the totals for Chichester (45.8%), the South East (42.1%) and England (39.7%).

36.4% of residents in the Neighbourhood Plan area do not work, which is over 10% higher than the total for Chichester (24.2%) and England (24.4%), and nearly 15% higher than the total for the South East (21.7%). This is likely linked to the significantly higher percentage of residents within the Neighbourhood Plan area over the age of 60, as shown within the 'age structure' Census statistics.

<sup>88</sup> DCLG (2015): Indices of Deprivation Explorer', [online] available to access via: <<http://dclgapps.communities.gov.uk/imd/idmap.html>> last accessed [12/04/19]

<sup>89</sup> ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

<sup>90</sup> ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

<sup>91</sup> ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

## Community assets and infrastructure

West Wittering has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the parish's sense of identity, including Wittering Football Club and Sailing Club, Memorial Hall, allotments, Millennium Meadow, Snowhill recreational area, the Old House at Home village pub and West Wittering Beach<sup>92</sup>.

## Summary of Future Baseline

As the population of the Neighbourhood Plan area continues to increase and age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

In the absence of the Plan, an unchecked expansion in the number of second homes within the parish could have implications for the vitality of the local community, placing pressures on community facilities during peak times of the year and otherwise leaving a higher percentage of homes unoccupied for most of the year.

## A8 – Health and Wellbeing

### Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>93</sup> ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

<sup>92</sup> West Wittering Parish Council (2019): 'Parish Assets', [online] available to access via: <<http://www.westwitteringparishcouncil.gov.uk/parish-assets>> last accessed [15/04/19]

<sup>93</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <<https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf>> last accessed [24/09/18]

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the health and wellbeing SEA theme:

- Policy 43 'Chichester Harbour AONB';
- Policy 44 'Development around the Coast';
- Policy 45 'Development in the Countryside';
- Policy 48 'Natural Environment';
- Policy 49 'Biodiversity';
- Policy 52 'Green Infrastructure'; and
- Policy 54 'Open Space, Sport and Recreation'.

## Summary of Current Baseline

### Joint Strategic Needs Assessment

At the regional level, the 2018 Joint Strategic Needs Assessment (JSNA) summary for West Sussex<sup>94</sup> provides a variety of statistics relating to the following themes: environment, population, assets and health/wellbeing, and provides a section on each broad life-stage of the population: childhood (starting well), working age (living well) and older age (ageing well). Summary of the key challenges as follows:

- Year-on-year changes in the 65 and over population, averaging +2,500 per year between 2002 and 2017, with a projected average of +4,800 per year between 2017 and 2032;
- In 2016/2017, 19.3% of adults were estimated to be physically inactive;
- 60% of adults and 29% of 10/11-year olds are overweight (including obese);
- Violent crime (as measured by the rate of recorded violent crime including sexual offences per 1,000 population) has been increasing in West Sussex, and nationally, in recent years. In 2016/17 there were a total of 13,567 recorded offences compared with 9,740 in 2014/15;
- The rate of people killed or seriously injured on the roads remains high in West Sussex. The rate for 2014-16 of 56.8 per 100,000 is significantly higher than England (39.7) and the 4<sup>th</sup> highest amongst comparable authorities; and
- It is estimated that 117,400 adults (aged 16+) in West Sussex are likely to have a common mental health problem, namely: generalised anxiety disorder, depression, phobias, obsessive compulsive disorder or a panic disorder.

Published for public consultation in December 2018 and reflecting the outcomes of the JSNA, the consultation draft of the Joint Health and Wellbeing Strategy 2019-2024 (JHWS) outlines a variety of aims which focus on the most important issues across the county, with an overall vision as follows<sup>95</sup>:

*“West Sussex is a good place in which to grow up, achieve, raise a family and grow old, in strong, safe and sustainable communities – it is a place where improved health and wellbeing is experienced by all our residents, and the health and wellbeing gap between communities is reducing.”*

<sup>94</sup> West Sussex Health and Wellbeing Board (2018): 'JSNA Summary', [online] available to access via: <<https://jsna.westsussex.gov.uk/updates/west-sussex-jsna-summary-2018/>> last accessed [15/04/19]

<sup>95</sup> West Sussex Health and Wellbeing Board (2018): 'Joint Health and Wellbeing Strategy 2019-24 (Consultation Draft)', [online] available to access via: <<https://haveyoursay.westsussex.gov.uk/public-health/jhw-strategy-consultation/>> last accessed [15/04/19]

## Public health profile for Chichester

Published in July 2018 by Public Health England, the public health profile for Chichester district outlines the following key trends<sup>96</sup>:

- Life expectancy for both men and women is higher than the England average;
- Life expectancy is 3.9 years lower for men and 3.8 years lower for women in the most deprived areas of Chichester than in the least deprived areas;
- Estimated levels of adult physical activity are better than the England average; and
- The rate of people killed or seriously injured on roads is worse than average.

### Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8. 77.9% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', which is lower than the totals for Chichester (82.6%), the South East (83.6%) and England (81.4%). The number of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 5.9%, which is higher than the totals for Chichester (4.3%), the South East (4.3%) and England (5.4%)<sup>97</sup>

Based on the 2011 census data, the total number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is higher than the regional and national trends. Overall, 75.0% of residents within the Neighbourhood Plan area report that their activities are not limited, which is lower than the regional and national trends<sup>98</sup>.

### Summary of Future Baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way. Nevertheless, the totals for the Neighbourhood Plan area are lower than the regional and national trends.

An ageing population within the Neighbourhood Plan area might place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing over the long term.

## A9 – Transportation

### Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the NPPF include:

- 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
  - The potential impacts of development on transport networks can be addressed*
  - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*

<sup>96</sup> Public Health England (2018): 'Public Health Profile for Chichester', [online] available to access via: <<https://fingertips.phe.org.uk/profile/health-profiles>> last accessed [15/04/19]

<sup>97</sup> ONS (no date): Census 2011: 'Health and Provision of unpaid Care 2011' (Table KS301EW)

<sup>98</sup> ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)



- iii. *Opportunities to promote walking, cycling and public transport use are identified and pursued*
  - iv. *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*
  - v. *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the West Sussex LTP3 2011-2026 is a strategic policy tool through which the council exercises its responsibilities for planning, management and the development of transport in the county<sup>99</sup>. The four strategies within the LTP3 that guide the Council's approach to maintaining, managing and investing in transport include: promoting economic growth, tackling climate change, providing access to services, employment and housing, and improving safety, security and health.

At the local level, the following policies within the Adopted Chichester Local Plan: Key Policies 2014-2029 directly relate to the transportation SEA theme:

- Policy 8 'Transport and Accessibility'; and
- Policy 39 'Transport, Accessibility and Parking'.

## Summary of Current Baseline

### Rail network

There are no railway stations within West Wittering parish. The nearest mainline railway station connecting residents to the national network is in Chichester, located approximately 11km to the north of the Neighbourhood Plan area. This station provides regular services to Brighton, in the east, (with links to Gatwick and London) and Southampton, to the west.

### Bus network

The primary routes through the Neighbourhood Plan area are the number 52 and 53, operated by Stagecoach<sup>100</sup>, which provide regular services to Chichester (approximately 11km to the north) and between East and West Wittering 'the Witterings'. There are frequent, half-hourly services throughout the week<sup>101</sup>.

### Road network and congestion

There is a network of 'C' roads which pass through the Neighbourhood Plan area and connect to neighbouring settlements of Shipton Green and West Itchenor. A single B-road (B2179) passes through the Neighbourhood Plan area and is the primary transport link both into and out of West Wittering. This provides connectivity to Chichester (via the A286) and to the A27 (approximately 11km to the north), which links to Portsmouth, to the west, and Brighton, to the east.

Regarding congestion issues, the B2179 is particularly sensitive to traffic issues during peak times of year (i.e. holiday seasons) and at weekends.

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<sup>99</sup> West Sussex County Council (2011): 'West Sussex LTP3', [online] available to access via: <<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan-2011-26-ltp3/>> last accessed [15/04/19]

<sup>100</sup> Stagecoach (2019): 'Route Search', [online] available to access via: <<https://www.stagecoachbus.com/maps>> last accessed [15/04/19]

<sup>101</sup> Stagecoach (2019): 'Timetable – 52 and 53' [online] available to access via: <<https://www.stagecoachbus.com/timetables>> last accessed [15/04/19]

## Cycle and footpath network

There are numerous Public Rights of Way (PROW) which pass through the Neighbourhood Plan area, including the 'New Lipchis Way' and a local footpath network between West Wittering, East Wittering, Shipton Green and West Itchenor<sup>102</sup>.

Passing along the Chichester Harbour coastline, the New Lipchis Way<sup>103</sup> connects to Chichester and provides access to East Head sand and shingle spit (owned by the National Trust) which is described as one of the last surviving pieces of natural coastline in West Sussex<sup>104</sup>.

In terms of cycle trails, there are no National Cycle Network<sup>105</sup> routes passing through the Neighbourhood Plan area. Locally, the East-West Wittering footpath/cycleway provides a dual use path joining the east and west settlement areas of the village<sup>106</sup>.

## Availability of cars and vans

Based on the 2011 census data, 83.9% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for the South East (81.4%) and England (74.0%) but broadly aligns to the total for Chichester (84.6%). The total percentage of households in the Neighbourhood Plan area with access to at least two or three cars or vans is similar to the totals for Chichester and the South East, but higher than the national trends<sup>107</sup>.

## Travel to work

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (35.2%) which is lower than the totals for Chichester (39.7%), the South East (41.3%) and England (37.0%). Comparatively, a higher percentage of economically active residents in the Neighbourhood Plan area choose to work from home in comparison to the regional and national trends.

The total percentage of the working population in the Neighbourhood Plan area choosing to walk or catch a bus, coach or minibus to work (6.6%) is lower than the total for Chichester (10.0%), the South East (10.4%) and England (12.0%)<sup>108</sup>.

## Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced at weekends and during peak times of year (i.e. holiday seasons) due to the influx of visitors and second home owners to the area.

Public transport use is likely to remain low compared with private car use. This is due to the relative inaccessibility of the neighbourhood Plan area via public transport, particularly in the absence of a train station.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by the LTP, there will be a continuing need for development to be situated in accessible locations.

<sup>102</sup> Bing Maps (2019): 'West Wittering OS Map', [online] available to view via: <<https://www.bing.com/maps/>> last accessed [15/04/19]

<sup>103</sup> New Lipchis Way (no date): 'Route Details', [online] available to access via: <<http://newlipchisway.co.uk/>> last accessed [15/04/19]

<sup>104</sup> National Trust (no date): 'East Head', [online] available to access via: <<https://www.nationaltrust.org.uk/east-head>> last accessed [15/04/19]

<sup>105</sup> Sustrans (2019): 'National Cycle Network Route Map', [online] available to access via: <<https://www.sustrans.org.uk/map-ncn>> last accessed [15/04/19]

<sup>106</sup> West Wittering Parish Council (2016): 'East-West Footpath/Cycleway', [online] available to access via: <<http://www.westwitteringparishcouncil.gov.uk/footpaths-and-open-spaces>> last accessed [15/04/19]

<sup>107</sup> ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

<sup>108</sup> ONS (no date): 'Census 2011: Method of Travel to Work 2011' (Table QS701EW)

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