

Chichester Local Plan Preferred Approach

Consultation Response
On behalf of Welbeck Strategic Land (IV) LLP

Contents

1.	Introduction.....	3
2.	Policy S2 – Settlement Hierarchy – sound.....	3
3.	Policy S3 – Development Strategy – sound.....	3
4.	Policy S4 – Meeting Housing Needs – unsound.....	4
5.	Policy S5 – Parish Housing Requirements 2016-2035 – unsound	8
6.	Policy AL8 – East Wittering Parish – unsound.....	9

Appendices

- A.** HELAA Site Assessment - Site ref. HWW0002
- B.** Transport Technical Note – Icenii Projects
- C.** Landscape Appraisal – David Williams Landscape Consultancy

**Representations on behalf of Welbeck Strategic Land (IV) LLP
Land at Church Road, East Wittering
Submissions in respect of the Chichester Local Plan: Preferred Approach**

1. Introduction

1.1 DMH Stallard act on behalf of Welbeck Strategic Land (IV) LLP in respect of the promotion of land at Church Road, East Wittering – HELAA site reference HWW0002 (Appendix A) – and the submission of representations in relation to the Chichester Local Plan consultation. A Transport Technical Note (Appendix B) and a Landscape Appraisal (Appendix C) supports these representations.

2. Policy S2 – Settlement Hierarchy – sound

2.1 Welbeck support the settlement hierarchy and the identification of East Wittering (and Bracklesham) as a second tier settlement, referred to as ‘Settlement Hubs’. This acknowledges the importance of East Wittering as a service centre benefiting from a range of services and facilities, with a ‘reasonable size population base’ to support them.

2.2 East Wittering and Bracklesham has a population of 4,658 and is the 4th largest settlement in the District, with a total of 21 facilities (Settlement Hierarchy 2018) and we welcome the identification of a settlement hierarchy to inform the strategy for housing development. Paragraph 4.17 of the emerging Local Plan acknowledges that new development of Settlement Hubs will reinforce the role of these settlements as centres providing a range of dwellings, workplaces, social and community facilities.

3. Policy S3 – Development Strategy – sound

3.1 Welbeck support the development strategy set out in policy S3, this represents the most sustainable approach to delivering housing across the district in accordance with the settlement hierarchy (Policy S2 and the Settlement Hierarchy 2018).

3.2 We support the distribution of housing in the Manhood Peninsula and at the settlement hub of East Wittering. As set out in policy S2 and the Settlement Hierarchy 2018 document, East Wittering is the 4th largest settlement in the district and benefits from a range of services and facilities. We submit a Transport Technical Note (Appendix B) in reference to land at Church Road, East Wittering, which highlights the sustainability of the site and the western part of East Wittering. We therefore support the identification of East Wittering

as a settlement for future growth and expansion in order to meet both district and local housing needs, in accordance with the principles of sustainable development.

- 3.3 Notwithstanding our support for policy S3, there are some concerns that the identification of sites and locations doesn't accord with the development strategy, with some lower tier, 'service village' settlements being required to take significant growth, over and above that identified for settlement hubs, such as East Wittering where there is capacity to accommodate additional housing.

4. Policy S4 – Meeting Housing Needs – unsound

- 4.1 Overall, Welbeck support the level of housing being proposed, this appears to be based on appropriate evidence and the Local Plan seeks to meet the full identified housing need of the district. The Local Plan will need to consider housing need in accordance with the new standard method, however, the housing figure proposed appears to accord with early calculations on what the standard method could mean for Chichester district.

- 4.2 However, we submit that the Local Plan could be more robust and allocate housing in settlement hubs and the manhood peninsula in particular, which has good links to Chichester. Policy S4 identifies 4,400 units on strategic locations and allocations, however, the Plan leaves 2,550 units of this to Neighbourhood Plans to allocate (as well as 500 units on small sites as required by policy S5). We submit that there are sites that accord with the settlement hierarchy and development strategy that would deliver against the housing requirement and could be allocated now, therefore ensuring robust housing delivery throughout the plan period.

- 4.3 Section 3 of the NPPF2 requires that plans provide a positive vision and framework for addressing housing needs. It requires that development plans include strategic policies to address priorities for development and use of land. Paragraph 20 requires that these policies set out the overall strategy for the patten, scale and quality of development, making sufficient provision for housing and at paragraph 23 states that Plans should allocate sufficient sites to deliver the strategic priorities of the area in accordance with the presumption in favour of sustainable development. It is acknowledged that the NPPF allows for non-strategic development plan documents to allocate sites for housing, but it is of significant concern that the Council are relying on around more than half of the strategic housing sites to be brought forwards through Neighbourhood Planning,

the NPPF requires that they be identified at the strategic planning stage, ie. the Local Plan.

- 4.4 The Local Plan represents an early review, required by the Inspector in relation to the current Local Plan; paragraph 7.9 of the adopted Local Plan acknowledges that it does not allocate sufficient land against the OAN. Additionally, the Council have been subject of a number of appeal decisions referring to the 5year housing land supply (HLS) position, some of which have suggested the Council are struggling to maintain a rolling 5 year supply in the absence of site allocations. It is acknowledged that the Council have now adopted a Site Allocations DPD, but this only accounts for small scale housing sites and has been adopted some 3 years after adoption of the Local Plan.
- 4.5 The Local Plan does not allocate land against the full 4,400 homes identified in policy S4 (strategic sites and locations). In total, the Plan defers to neighbourhood plans to allocate approximately 3,050 dwellings, of which 2,550 are 'strategic'.
- 4.6 At paragraphs 6.1-6.3 of the emerging Local Plan, it states that strategic locations have been identified following a comprehensive selection process, including consideration in the Sustainability Appraisal, Habitats Regulations Assessment, Transport Assessment, Infrastructure Delivery Plan and Landscape Study. However, if this is the case, then the Council have the evidence base available to allocate sites now rather than rely on broad locations and neighbourhood plans. The Council have also undertaken a HELAA which identifies that sites are deliverable now, in the case of East Wittering, the HELAA identifies sites for around 1,443 units (including land at Church Road, East Wittering - which is in West Wittering Parish), there is no reason why the Council could not allocate sites now, through the Local Plan process, to ensure a successful plan that delivers against the full OAN and housing requirement, but also the 5yr HLS.
- 4.7 Paragraph 73 of the NPPF requires that strategic policies include a trajectory illustrating the expected rate of housing delivery over the plan period, with such heavy reliance on neighbourhood planning amounting to 3,050 (2,550 on strategic locations/allocations and a further 500 through 'parish housing requirements'), it is impossible to identify a housing trajectory for the plan period. Therefore, sites must be identified now.
- 4.8 Neighbourhood plans generally (admittedly not always), make provision for small sites to meet local housing needs, which is acknowledged in the first sentence of policy S5. Neighbourhood planning groups do not have the same

level of resource available to plan for strategic development and local politics make it difficult for strategic development sites to pass through a local referendum. It is not clear why the Local Plan places so much reliance on neighbourhood plans to allocate almost all of the strategic housing land requirement, it considered burdensome and without support.

- 4.9 The strategy does not appear to be by agreement with Parish Councils, therefore there is a real risk that these settlements will not allocate sufficient housing. Fishbourne and Hunston Parish Council's have published their response to the Local Plan consultation on their respective websites, both state that they have significant concerns regarding the identification of 250 and 200 dwellings respectively in their Parish. Without support for strategic development within the Parish's, there is a real threat that they will not deliver against the housing requirement. In the absence of any agreement to deliver strategic development, Chichester District Council as the strategic plan making authority should be allocating these sites now and within the Local Plan.
- 4.10 The NPPF acknowledges that the delivery of housing is often best achieved through planning for larger scale development (paragraph 72), such as significant extensions to existing villages and towns. The scale of the existing settlement would determine whether proposed development can be defined as 'larger scale development'. Many of the strategic development locations would be considered 'larger scale development' and the NPPF then requires 'strategic policy-making authorities' to identify locations for appropriate development to ensure that there is sufficient infrastructure in place, whilst this can be achieved to a certain extent through the identification of broad locations, it is onerous to expect Parish Council's to have the technical ability and resource to fully assess infrastructure requirements of individual strategic sites. The NPPF also requires that planning for larger scale development requires a realistic assessment of the likely rates of delivery, this cannot be achieved by delegating responsibility to neighbourhood plans, and undermines the housing trajectory. In our opinion, devolving allocation of strategic development to Parish Council's is overly burdensome and without the support of Parish Councils is unlikely to be achieved.
- 4.11 The case of Fishbourne also demonstrates the discord between the number of units identified for Fishbourne (250 units) against suitable sites (200 units) and again adds weight to the need for strategic sites to be considered and allocated in the Local Plan, as a failure to do so would rely on settlements such as Fishbourne needing to allocate sites currently seemed as unsuitable, whereas there are sites at East Wittering (1,443 units), capable of accommodating over and above the level set by the Local Plan. It is also not clear why third tier /

service villages are being required to deliver high levels of housing where they are suitable and available sites (as identified in the Council's own evidence base) within higher order and more sustainable settlements such as East Wittering, this would appear to be in conflict with the Council's development strategy.

- 4.12 Should the neighbourhood planning process fail to deliver the strategic development proposed, there is no mechanism in policy S4 for the Council to step in and allocate sites (such as in policy S5 – which relates to small sites only). Many of the Parish Council's have not commenced a Neighbourhood Plan, such as East Wittering, and it could take some time for sites to come forwards. The Local Plan Review is being undertaken because the adopted Local Plan failed to identify sufficient housing against the OAN, the Review must therefore address housing needs. There is a strong case for allocating strategic sites now, and the evidence base exists for doing so, there is no justification for a deviation from this approach particularly in the absence of support from Parish Councils and the failure of the adopted Local Plan to meet full housing needs.
- 4.13 Land at Church Road, East Wittering (HELAA ref. HWW0002 – Appendix A) accords with the settlement hierarchy and development strategy set out in policies S2 and S3 of the Plan and is capable of delivering c250 dwellings, this could be allocated now to ensure a robust housing delivery position. The site, is identified in the HELAA 2018 as being capable of delivering 230 dwellings in the first 5 year period (our evidence base suggests this could be closer to 250 dwellings), furthermore, it is acknowledged to be suitable, available and achievable. As will be demonstrated in our site specific representations, we cannot support the Council's reliance on strategic development sites coming forwards through the neighbourhood planning process which would delay housing delivery where it could be allocated now on the basis of the Council's own evidence.
- 4.14 There are also practical difficulties with the Council's approach to devolving strategic site allocations to the Parish Council's which need to be considered and addressed. East Wittering, the fourth largest settlement in the district, and therefore a focus of development, is divided by a Parish boundary, with a large amount of the settlement falling within West Wittering Parish. The HELAA identifies 2 sites within East Wittering capable of accommodating development as well as land at Church Road, East Wittering which is within West Wittering Parish. The evidence base supports development at East Wittering and the decision to rely on the neighbourhood plans to deliver the housing requirement means that it ignores part of the settlement of East Wittering which is capable

of accommodating additional growth, on sites identified as being deliverable in the HELAA 2018 and which are equally sustainable. As we set out in further representations, the evidence base relates to settlements, not parishes, and reference to parish housing delivery should be amended accordingly.

- 4.15 In order for policy S4 to be sound and to ensure that the full OAN is met, the Plan should allocate strategic sites now in accordance with the NPPF. The evidence base and development strategy would support the inclusion of sites at this stage and there is a suite of sites available to the Council which could be allocated now, including land at Church Road, East Wittering.

5. Policy S5 – Parish Housing Requirements 2016-2035 – unsound

- 5.1 Generally, we are supportive of the Council's inclusion of a neighbourhood planning housing requirement, to assist the neighbourhood planning process, this accords with national planning policy and will ensure the delivery of small sites to meet housing needs. However, the evidence base and policies S2 and S3 refer to settlements not parishes yet policy S5 refers to 'parish housing requirements', this does not accord with the evidence base. The reliance on parish housing delivery ignores practical difficulties such as the division of East Wittering across two parishes. It would preclude the allocation of sites, such as Church Road, East Wittering, which is a highly sustainable site according with the development strategy, from coming forwards through later development plan documents. Policy S5 should be amended to refer to settlements rather than parishes.

- 5.2 Additionally, we cannot support the Council's reliance on strategic development sites coming forwards through the neighbourhood planning process. The table in policy S5 acknowledges those areas where strategic development is allocated elsewhere within the Plan therefore negating the need for inclusion within the 'Parish Housing Requirement'. East Wittering is identified as having a zero housing requirement on the basis that strategic provision is made via policy AL8 however, this policy requires delivery of 350 units through the neighbourhood planning process, so it should be included within policy S5. Forthcoming neighbourhood plans will be required to deliver in accordance with policy S5, but as there is no requirement for East Wittering, it could be argued that they do not need to deliver anything against the housing requirement. Whilst there is a mechanism in Policy S5 for the Council to take responsibility for allocation sites if neighbourhood plans fail to do so, there is no such mechanism in relation to strategic sites, which are not identified in policy S5, but by policies elsewhere in the Plan.

- 5.3 Furthermore, policy S5 states that West Wittering Parish should accommodate 25 dwellings in a forthcoming Neighbourhood Plan, this is presumably based on the settlement hierarchy and development strategy. However, owing to the boundaries of the Parish, which also encompasses the west of East Wittering, it fails to consider the ability of the Parish to accommodate additional housing numbers on the edge of East Wittering, a second tier 'Settlement Hub' and the fourth largest settlement in the District.
- 5.4 The Local Plan strategy and evidence base relates to settlements, but the devolution of planning to the Neighbourhood Plans has resulted in a strategy which delivers housing by Parish (not settlement); in the case of East Wittering and West Wittering, this excludes sustainable development proposals on the edge of East Wittering which are capable of accommodating development in support of the development strategy and 350 units proposed for East Wittering, and over and above the 25 units designated for West Wittering.
- 5.5 As will be demonstrated elsewhere in our representations, we submit that strategic allocations should be made now and in the Local Plan; the identification of 'strategic sites' is a 'strategic policy' which the NPPF requires should be made in the parent Local Plan, and not within Neighbourhood Plans. On this basis, the purpose of policy S5 would be to account for residual housing needs which can be met through Neighbourhood Plans (which is currently how the policy is drafted).
- 5.6 Notwithstanding our position, that strategic sites should be allocated now, if strategic allocations are to be left to Parish Council's to identify through Neighbourhood Plans, then this housing requirement, even where this is considered to be strategic, should be set out in policy S5, as it is not met elsewhere in the Plan by site allocation policies.
- 5.7 Additionally, as the evidence base and policies S2 and S3 of the draft Plan relate to settlements, not Parishes, we submit that policy S5 (and other policies later on in the Plan) should refer to settlements, this would enable sites, such as land at Church Road, East Wittering, to come forwards as part of the identified 350 units.
- 6. Policy AL8 – East Wittering Parish – unsound**
- 6.1 We submit that policy AL8 is unsound as it fails to be the most appropriate strategic for delivering housing, it also has the potential to undermine the ability of the Local Plan to meet against housing needs.

- 6.2 Paragraphs 6.57 – 6.61 and policy AL8 refer to the sustainability of the ‘Parish’, however, it fails to acknowledge that East Wittering is divided in two, with the west of the settlement falling within West Wittering Parish. It also fails to respond to the evidence base which is undertaken on a settlement by settlement basis, and not by Parish. It acknowledges the range of everyday facilities available to the ‘Parish’, again failing to acknowledge that these sustainability attributes apply to the whole settlement and not just those parts of the site that fall within East Wittering Parish. Paragraph 6.59 in particular identifies that East Wittering and Bracklesham form a settlement hub where there is potential for some additional development growth, this would accord with policies S2 and S3 of the draft Local Plan and we support the identification of East Wittering (as a settlement) as a focus for around 350 dwellings.
- 6.3 Land at Church Road, East Wittering (HELAA site reference HWW0002 – Appendix A) adjoins existing development and the proposed built up area boundary. The enclave of housing along Furzefield and Briar Cottage Caravan Park is located to the north of the site and Scotts Farm Caravan and Holiday Park is directly to the west of the site (whilst google maps suggests this is separated by a field, it is not, this field is used for tents and caravans for the majority of the year). The east of the site is defined by Church Road and East Wittering Industrial Estate beyond. The site is therefore surrounded by development on most of its boundaries.
- 6.4 There are bus stops directly outside the site on Church Road, provide twice hourly services to Chichester and surrounding villages. Additionally, the site is located close to local services and facilities; the Thatched Tavern pub is directly opposite the site, East Wittering Community Primary School is only 350m from the site and the nearest collections of shops is on Cakeham Road and Shore Road only 500m from the site and includes a Tesco Express, Co-Op, a local health centre and pharmacy, all within walking and cycling distance of the site. Employment opportunities are available locally, including at East Wittering Industrial Estate across the road from the site. St Peter’s and St Anne’s Churches are also within 450m of the site. It is therefore in a highly sustainable location (which is generally recognised in policies S2 and S3 and the background evidence) and in accordance with the development strategy, should not be ignored on the basis that it falls within a different parish.
- 6.5 As demonstrated in the enclosed Transport Technical Note (Appendix B), the site benefits from the ability to access onto Church Road directly, and onwards towards B2179 and the A27 and would benefit from the committed improvements to the Fishbourne and Stockbridge roundabouts. It therefore has good accessibility.

- 6.6 We also submit a Landscape Appraisal of the site (Appendix C), which indicates that the site is capable of accommodating housing development with limited or minimal impacts on landscape character and views. Furthermore, that *“the eastern and southern parts of the Site are most appropriate to develop for housing to minimise landscape and visual impacts. These parts of the Site relate well to the built up edge of East Wittering and housing at Furzefield and whilst perceived in some views the development would be seen in the context of existing development when seen from the wider surrounding area minimising the change perceived.”*
- 6.7 The accompanying Landscape Opportunities Plan identifies approximately 7.7 hectares of developable land, the site could therefore deliver approximately 270 dwellings based on a standard 35dph, however, given the edge of settlement location, we submit that it is more realistic that 250 dwellings could be achieved, broadly in accordance with the HELAA assessment.
- 6.8 The site is identified as being achievable in the HELAA 2018 and as has been demonstrated, it is in a highly sustainable location. The Local Plan and evidence based acknowledges that East Wittering is a growth location, however, the Local Plan as currently drafted fails to acknowledge that East Wittering is divided into two parts – between East and West Wittering Parishes. Policy AL8, as it is based on the parish rather than settlement of East Wittering fails therefore to acknowledge suitable sites which would accord with the development plan strategy. It then goes on to identify significant growth of lower order settlements, this does not represent the most sustainable strategy, particularly given the evidence base.
- 6.9 We have made representations that strategic site allocations should be made now in order for the Plan to be sound and the evidence base would support the allocation of land at Church Road, East Wittering for around 250 dwellings. We have also made representations that the Local Plan seeks large scale housing at lower tier ‘service villages’ which is in conflict with the settlement hierarchy and development strategy. We submit that East Wittering has the ability to deliver more than the 350 units proposed in policy AL8, this would not only accord with the development strategy but would represent the most sustainable strategy for delivering the housing requirement (and OAN). Nonetheless, land at Church Road could delivery a large proportion of the requirement (whether this be 350 dwellings or more as submitted) in a highly sustainable location well contained by existing development and with good accessibility. However, the wording of policy AL8 would preclude the site from future consideration, contrary to the evidence base.

- 6.10 In summary, policy AL8 should be amended to allocate housing sites in accordance with the evidence base, land at Church Road is such a site and should be identified now in order to provide certainty to the housing trajectory and 5yr HLS. Without prejudice, should the Council maintain the position and seek allocation of strategic sites by neighbourhood plans, policy AL8 should be amended to refer to East Wittering as a settlement, and not by Parish.

February 2019




Appendix A

CHICHESTER DISTRICT COUNCIL


West Wittering

Legend

 Settlement Boundary

 Parish boundary

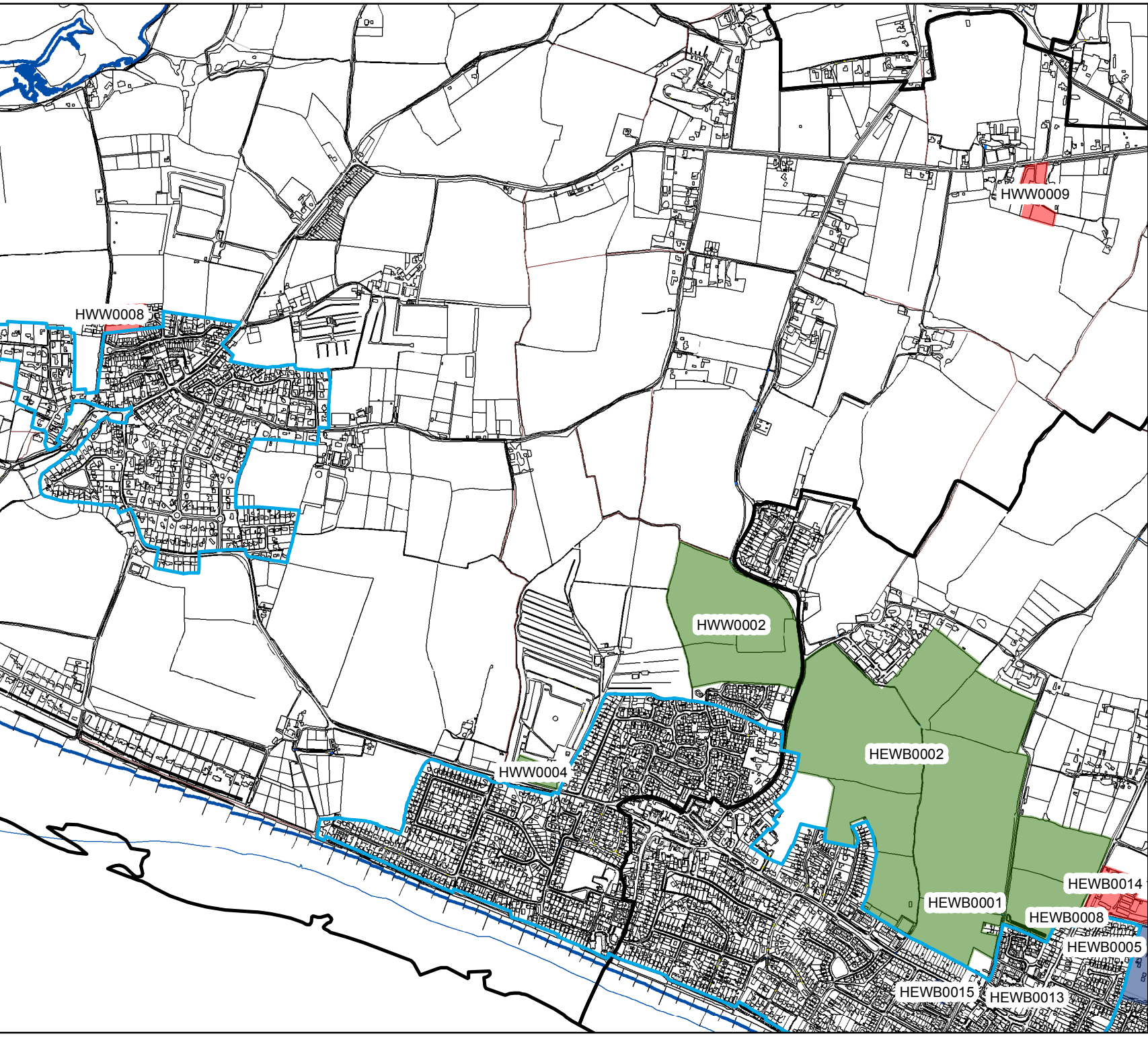
HELAA 2018

 Achievable

 Rejected

 Planning Permission/Under Construction

 Site Allocation



West Wittering

HELAA ID	Site Address	Settlement	Parish
HWW0002	Land west of Church Road	East Wittering	West Wittering

Site size (hectares)	Existing Use	Proposed Use
11.78	Agriculture	Housing

Site Description
Large irregular-shaped site comprised of two agricultural fields subdivided by a hedgerow. Scrubland to the south, agricultural fields to the west and east and residential dwellings to the north.

Suitability
The site is potentially suitable as it is located adjacent to the settlement boundary, subject to detailed consideration

Availability
The site was submitted during the Call for Sites 2016 and is therefore considered available.

Achievability
There is a reasonable prospect that development would be achievable during the Plan period.

Yield	
Proposed (or estimated)	Source
230	Promoter

Estimated timescales for delivery		
1 – 5 years	6 – 10 years	11 – 16 years
230	0	0



Appendix B

Land at East Wittering

Project No:	PC001	Prepared by:	PC/SM
Client:	Welbeck Land	Approved by:	Paul Cranley
Date:	6 th February 2019	Status:	V1 Draft
Subject:	Initial Transport Appraisal		

1 Introduction

- 1.1 Pell Frischmann (PF) is commissioned by Welbeck (the 'Client') to provide initial transport planning and highways consultancy advice, and to prepare this Initial Transport Appraisal (Technical Note), in connection with the Client's land holdings at East Wittering, West Sussex (the 'site'). The site has been identified within Chichester District Council (CDC) Housing and Economic Land Availability Assessment (HELAA) where it is referenced as HWW002.
- 1.2 This Technical Note is intended to consider the key transport and highways matters pertaining to the site in the context of a potential residential development of circa 230 dwellings.

2 Site Location and Description

- 2.1 The site is located in the village of East Wittering, adjacent to the northern edge of the existing settlement boundary. It is bound to the north and east by Piggery Hall Lane and Church Road respectively, with an existing residential to the south and agricultural land to the west. The site is shown in **Figure 2-1 below**.

Figure 3-1 Site Location ¹



Bus Services

- 2.2 The closest bus stops are located on the Piggery Hall Lane adjacent to the northern boundary of the site, with further stops approximately 500m south of the site on Stock Lane.
- 2.3 These bus stops are well served by a number of bus services with the routes and frequencies shown in **Table 2-1**.

Bus Route	Destination	Peak Frequency (per hour)
52	Chichester – West Wittering	2 per hour
53	Chichester – West Wittering	2 per hour
150	Ictchenor - Selsey	Off peak service
614	Chichester – East Wittering	Off peak service
653	Chichester – East Wittering	Off peak service
652	Chichester - Birdham	Off peak service

- 2.4 All buses route via Chichester and provide access to Chichester Station (approximately 5km away with a journey time of 12mins).

¹ www.openstreetmap.org

Pedestrian / Cycle Routes

- 2.5 The majority of the roads in the immediate locality of the site are lightly trafficked and considered generally suitable for cycling.
- 2.6 There are footways on the eastern side of Church Road which provide potential access from the site towards East Wittering village centre and associated facilities.

Local Highways

- 2.7 The site is located immediately to the north of East Wittering and is connected to the centre of the village via Church Road. Church Road continues as Piggery Hall Lane to the north of the site and acts as the main route from the site towards Chichester (via the B2179 and A286) which is located approximately 10km north east of the site. The B2179 and A286 also provide access to the A27, which in turn provides connection to the wider strategic road network.

Local Facilities

- 2.8 The site is located approximately 500m north of East Wittering village centre, which is based around Cakeham Road, Oakfield Road and Shore Road. Within the village centre there is a range of key facilities and amenities including two foodstores, pharmacy and health centre, bank, butchers and a range of small independent retailers and local employers. There are also a number of public houses and restaurants located within the village centre and towards the beach.
- 2.9 East Wittering Community Primary School is located on Church Road, approximately 350m south of the site and connected to the site by continuous footways, ensuring safe and convenient access to the school from the site for potential parents and children

3 Policy Context

Chichester District Council – Local Plan, Transport Study of Strategic Developments, Options and Sustainable Transport Measures, December 2018

- 3.1 The Chichester District Council – ‘*Local Plan, Transport Study of Strategic Developments, Options and Sustainable Transport Measures, December 2018*’ (Transport Strategy) is a supporting document to inform the preparation of the Chichester Local Plan Review 2016-2035. It identifies that there are future capacity constraints to the north of the proposed site along the A286 and at junctions on the A27 Chichester Bypass. Capacity constraints which are likely to impact the site have been identified at the following junctions:
 - 1) A286 / Dell Quay Road;
 - 2) A27 - Fishbourne Roundabout; and
 - 3) A27 - Stockbridge Roundabout.
- 3.2 The three junctions are shown in **Figure 3-1**.

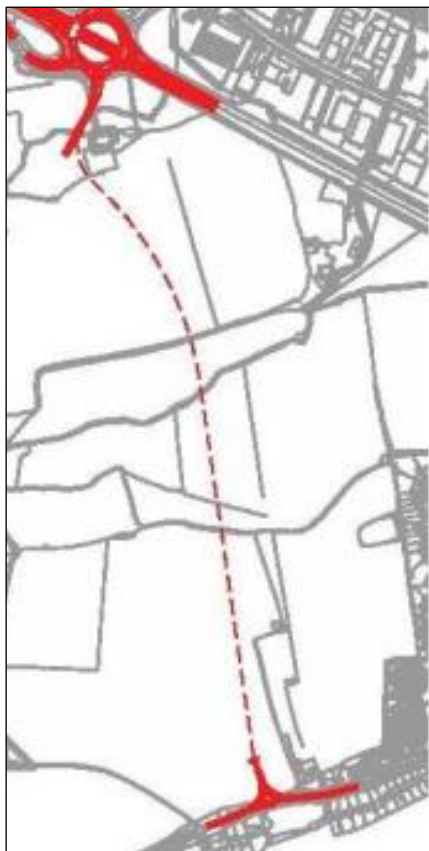
Figure 3-1 Junction Capacity Constraints ²



- 3.3 The CDC Transport Strategy identifies that alongside a committed scheme to signalise the A27 Stockbridge Roundabout, the banning of right turns from the A27 will also be required to facilitate future growth.
 - 3.4 The proposed mitigation also includes an upgrade to the Fishbourne Roundabout and the inclusion a new Stockbridge Link Road, linking to the Fishbourne Roundabout via an additional arm.
- The proposals for the Fishbourne Roundabout and the Stockbridge Roundabout are shown in **Figure 3-2**.

² www.openstreetmap.org

Figure 3-2 Proposals for Fishbourne Roundabout and Stockbridge Link Road ³



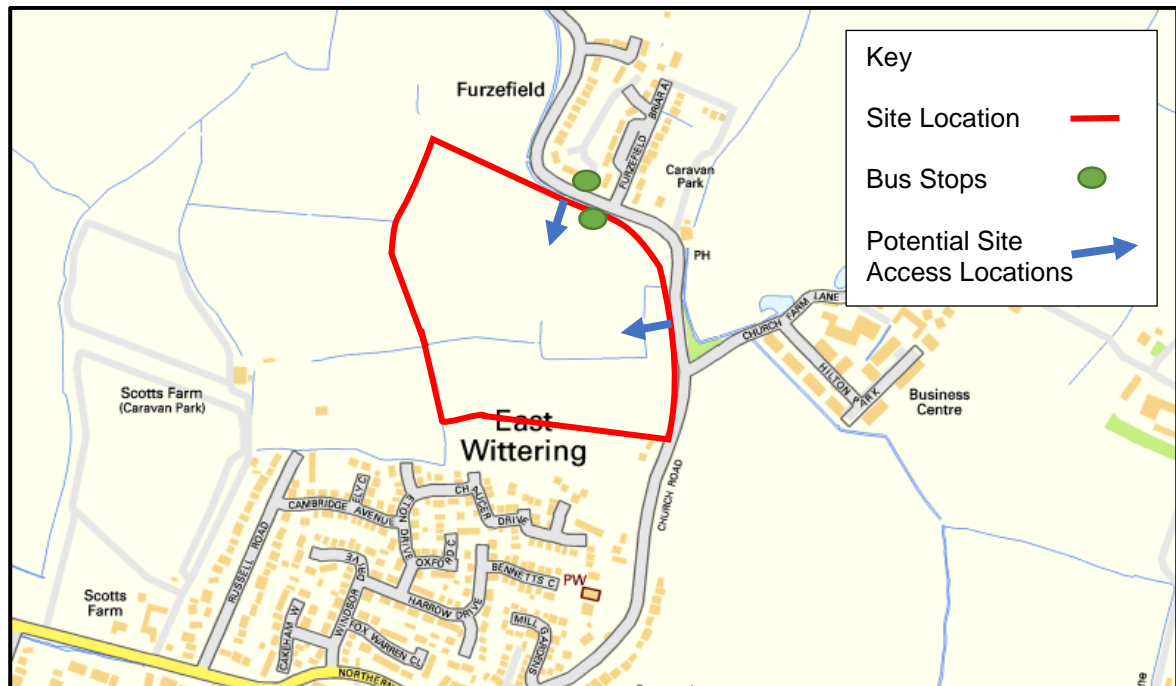
- 3.1 The Transport Strategy also notes that there is the potential to provide a Park and Ride scheme to the south of the Fishbourne Roundabout to intercept trips before they hit the A27.
- 3.2 Based on the above, the potential development site would complement the aspirations of WSCC and CDC in respect of the delivery of the Stockbridge Link Road and associated network improvements.

4 Potential Site Access Strategy

- 4.1 The site has an existing frontage of around 275m to the east onto Church Road, and around 225m to the north on Piggery Hall Lane. Both sections of road are subject to a 30mph speed limit and are generally free of any potential obstruction to visibility other than the existing hedgerow to the southern end of Church Road.
- 4.2 Given the level of development proposed and the layout of the local highway network, it is suggested that a priority junction would represent the most appropriate junction type to facilitate access to the site. Based on the existing 30mph speed limit, visibility splays of 2.4m x 40m would be required at the site access(es). From a review of the extents of site frontage, it would appear to be possible to provide an access located on either the northern or eastern boundary of the site, with further potential to provide two access points or a main entrance and emergency access to the site.
- 4.3 The potential access locations are shown on the plan at **Figure 4-1** below:

³ Chichester District Council – Local Plan, Transport Study of Strategic Developments, Options and Sustainable Transport Measures, December 2018

Figure 4-1 Potential Site Access Locations



Pedestrian and Cycle Access

- 4.4 The potential access junctions could be designed to incorporate pedestrian and cycle access into the development site. It is likely that pedestrian crossing facilities could be provided at the site access on Church Road to ensure suitable connection to the footway on the eastern side of the carriageway.

5 Conclusion

- 5.1 The site is well located immediately to the north of the existing settlement boundary of East Wittering, approximately 500m to the north of the existing village centre.
- 5.2 The site has good access to bus stops, which provide connections to Chichester railway station and other key facilities within the city.
- 5.3 Connection to the A27 and wider strategic highway network is taken via the B2197 and A286.
- 5.4 The proposed development complements well the proposed mitigation measures identified within the CDC Local Plan and in particular the Stockbridge Link Road.
- 5.5 A proposed new access into the site could be provided from either Church Road or Piggery Hall Lane, with further potential for each of these to act as the primary and/or emergency vehicle access.



Appendix C

TECHNICAL NOTE: PRELIMINARY LANDSCAPE APPRAISAL

LAND WEST OF CHURCH ROAD, EAST WITTERING, CHICHESTER PO20 8PS

Introduction

1. David Williams Landscape Consultancy (DWLC) were instructed by Welbeck Strategic Land (IV) Limited in January 2019 to undertake a preliminary landscape and visual assessment of the land to the west of Church Road, East Wittering, Chichester, West Sussex PO20 8PS, and to advise on the landscape and visual issues which might affect the possible future development of the Site for residential development and to prepare an indicative landscape constraints plan for the Site.
2. The aim of the appraisal is to assess the landscape characteristics of the Site and its surroundings, to identify its potential to accommodate housing development and to highlight the landscape and visual issues that would need to be addressed as part of the next stage of the project.
3. The approach taken to this assessment was one which accords with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and included undertaking a field survey of the Site and surrounding area and a review the background information available, including the:
 - a) Chichester District Local Plan: Key Policies 2014-2029,
 - b) the Strategy for the West Sussex Landscape Assessment (October 2005) and associated / relevant land management guidelines (referred to below as The West Sussex Landscape Land Management Guidelines),
 - c) the Local Distinctiveness Study of West Sussex (Undated),
 - d) The Sussex Historic Landscape Characterisation;
 - e) The Chichester Landscape Capacity Study 2009, 2011; and
 - f) The latest Draft Chichester Local Plan Review 2035 Landscape Capacity Study November 2018 to assess the landscape context of the Site.
4. A site visit was carried out on 15th January 2019 (when the weather was overcast but dry with reasonable visibility) to assess the landscape context of the Site and a number of photographs were taken as a record of the Site's visibility and the Site's landscape and visual characteristics.
5. The report represents the results of the landscape and visual assessment of the Site and its surroundings. The main part of this report describes the landscape and visual characteristics of the Site and this is followed by an outline of the landscape and visual issues relating to the Site and its potential development for housing, with a final section setting out the conclusions of the assessment.

The Site / Context:

6. The Site forms an irregular shaped parcel of land of approximately 11.78 hectares (29.10 acres) comprising two medium sized, irregular shaped arable fields subdivided by sections of hedgerow with Church Road defining the eastern boundary and Piggery Hall Lane defining part of the north eastern boundary with existing field boundary hedgerows and trees forming the remaining boundaries to the Site.



Aerial Photograph of the Site (Source: Google Maps)

7. The southern boundary of the Site immediately adjoins the northern edge of East Wittering and recently constructed, modern, 2 storey housing served of Sandpiper Walk. This development is partially visible from parts of the Site and vantagepoints to the north and west and influences the character of the Site. To the south of Sandpiper Walk, there is further older mixed height housing (2 storey / 1 ½ storey and single storey / bungalow development) extending towards the centre of East Wittering and shopping area, located on the B2179 / Northern Crescent and Cakeham Road, with the coastline and English Channel to the south.
8. To the east of the Site and Church Road are several open large arable fields and East Wittering Industrial Estate, which is generally enclosed and contained by areas of tree planting. To the north and east of the industrial estate is Church Farm Residential Care Home, The Church of the Assumption of St Mary The Virgin together with a cluster of detached houses and bungalows on Church Farm Lane with open countryside beyond

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extending towards the B2198 / Bracklesham Lane and village of Almodington further to the east.

9. To the north east of the Site is an enclave of housing (Furzefield) served of Piggery Hall Lane, Furzefield and Briar Avenue with Briar Cottage Caravan Park to the east of the housing area. This development is partially visible from parts of the Site and vantagepoints to the north and west and influences the character of the Site. The Thatched Tavern Public House lies close to the north eastern corner of the Site. To the north west of the Site, there are a number of open, medium to large irregular shaped fields predominantly in arable use with the open farmland and dispersed development, mainly ribbon development, and holiday / caravan parks extending towards the villages of Shipton Cross and Itchenor and Chichester Harbour to the north and west.
10. To the west of the Site are a number of small open fields forming part of Scotts Farm Holiday Village and Camping Site (the fields immediately adjoining the Site are used for camping or as a play area or for dog walking) beyond which is open farmland comprising predominantly large arable fields extending towards the village of West Wittering and Chichester Harbour. The land to west of West Wittering and around Shipton Cross / Itchenor to the north falls within the Chichester Harbour Area of Outstanding Natural Beauty (AONB) and Chichester and Langstone Harbour Special Protection Area (SPA).
11. The topography of the area is low lying and appears flat, with the majority of the land below 5 metres AOD. The Site is not crossed by any public rights of way.
12. The Site lies within the administration area of Chichester District Council and within West Wittering with the parish boundary formed by Church Road in the vicinity of the Site.

Findings:

Landscape Character:

13. The Site comprises an irregular shaped parcel of land consisting of two medium sized arable fields subdivided by discontinuous sections of hedgerow about 1.5 to 2.0 metres in height, adjoining a drainage ditch which follows an irregular alignment east to west across the Site. The larger arable field occupies the northern parts of the Site.
14. The eastern boundary of the Site is defined by Church Road and sections of maintained hedgerow approximately 2.0 metres in height for most of its length. However, a short section of the boundary is open allowing views into and across the Site. At the northern end of this open section there is a farm access to the Site. To the east side of Church Road there is a wide verge, footway and hedgerow about 2.0 metres in height with a small copse of trees (between 8.0 to 10.0 metres in height), situated to the north of the Church Road / Church Farm Lane junction (about midway along the eastern boundary of the Site). The hedgerow and copse partially curtail and control views from locations to the east of the Site.
15. The eastern section of the northern boundary is also defined by Piggery Hall Lane and section of maintained hedgerow up to 2.0 metres in height. There is a further informal access into the northern parts of the Site from Piggery Hall Lane, opposite No. 6 Piggery Hall Lane. To the north of this section of boundary is a housing estate comprising a mix of single storey

dwellings and 2 storey semi-detached houses fronting on to Furzefield and cul-de-sac of predominantly 2 storey terraced houses to the north served off Hawthorn Close. From the lane (and adjoining houses), the hedgerow partially curtails views into and across the Site whilst the adjoining houses / estate provides some containment and enclosure to the north eastern edge of the Site and restricted views from location to the north east. The housing also has an urbanizing influence on the northern eastern parts of the Site.

16. The western section of the northern boundary is defined by a tall discontinuous mixed species hedgerow (Hawthorn, Dogwood and Bramble) and trees (Stunted, wind-swept Oak and Willows) adjoining Public Footpath No. 14, which extends westwards from Piggery Hall Lane to connect to Elms Lane in the west. The sections of hedgerow and trees restrict some views into the Site from a short section of the footpath and provides some containment and enclosure to this boundary.
17. The western boundary of the Site is defined by existing mixed species hedgerows (mainly Hawthorn, Dogwood and Bramble) with some evergreen species within the southern section of the hedgerows and occasional mature Oak trees. The trees provide some containment to the Site although due the low height of the hedgerow, some views are possible into and out of the Site along this edge.
18. The southern boundary of the Site is defining an existing mixed species hedgerow and wind-swept trees between 8.0 to 10.0 metres in height with the middle section of the boundary formed by a line of conifer trees, up to 10.0 metres in height, with lower section of the trees trimmed back allowing partial views into and out of the Site. The tall hedgerow and trees provide some containment and enclosure to the Site although the adjoining housing when seen from within the Site also has an urbanizing influence on the southern parts of the Site.
19. The Site lies at an elevation below 5.0 metres and appears flat although there is a very gentle fall within the northern parts of the Site falling southwards to field drainage ditches crossing the central portions of the Site with the southern parts of the Site falling westwards to a further section of ditch adjoining the south western boundary. The ditches flow southwards following the entrance road to Scotts Farm Holiday Village / Camping Site before crossing the B2179 / Cakeham Road and extending through the built up area of East Wittering to discharge to the sea near Charlmead Road.
20. In terms of vegetation, tree cover within the landscape is relatively scarce / limited comprising mostly wind swept Oak and Willow tree species. In the immediate vicinity of the Site tree cover consists of a small copse situated at the junction of Church Road and Church Farm Lane, trees surrounding East Wittering Business Park / Church Farm Retirement Home and adjoining church to the east, evergreen trees forming part of the southern boundary to the Site and line of wind swept trees adjoining Footpath No.14, forming part of the Site boundary to the north east.
21. In the wider surrounding area, tree covers comprises individual trees within field boundary hedgerows to the west and north including line of trees adjoining Footpath No.16 and Footpath No.17 near Scotts Farm / Elms Lane as well as taller trees surrounding parts of Nunnington Farm, some distance from the Site to the north west, and trees surrounding Speedcroft and linear development along Chapel Lane and the B2179 to the north.

Landscape Character Assessments

22. The Site lies within National Character Area Profile (NCAP) 126 – South Coast Plain and “Chichester Harbour” Landscape Character Area (SC3), with the “Pagham Harbour” LCA (SC4) to the east, as defined by The West Sussex Landscape Land Management Guidelines. The “Chichester Harbour” LCA (SC3) covers an extensive area and includes the village of West Wittering and extends eastwards to Almondington with the southern edge of the LCA following the northern edge of East Wittering whilst Pagham Harbour LCA (SC4) lies to the north of Selsey. The key characteristics of Character Area SC3 / SC4 are described as:

- *“Enclosed natural harbours of marine water, tidal mudflats and saltmarsh with small inlets and creeks.*
- *Contrast with the surrounding open agricultural land.*
- *Localised presence of woodland, for example, Old Park Wood, Bosham and Church Norton Wood.*
- *Noise of birds, waves and masts.*
- *Distinctive historic features include oyster beds, earthworks, old sea defences, quays, and boatyards.*
- *Rich range of habitats at the harbour edges including mudflats, saltmarsh, grazing marsh, reedbeds, sand dunes, shingle banks.*
- *Areas of unimproved grassland concentrated on their edges.*
- *Wind-shaped trees and scrub.*
- *Attractive harbourside settlements and early medieval flint churches such as at Bosham and Pagham.*
- *Landscapes of great wildlife importance”.*

23. The Land Management Guidelines describes the overall character of these areas as follows:

“These Character Areas lie in the south west of the county to the south and south west of Chichester. The internationally and nationally important areas of Chichester and Pagham harbours are distinctive for their enclosed expanses of marine water, tidal mudflat, shingle, marsh, wetland scrub and small creeks. Chichester Harbour differs from Pagham Harbour because of its larger size and greater diversity, with numerous inlets and its more wooded shoreline and clusters of harbour side settlement, boatyards, marinas and yachts. When approaching Chichester Harbour by land, the sight of masts glimpsed through the fields creates a sense of anticipation of the coastal edge. In contrast, views in to Pagham Harbour are dominated by vast tidal mudflats and fringing marsh vegetation enclosed to the south by open shingle banks. Large parts of these areas have been reclaimed from the sea, and remain below the current high spring tide level. Whilst traffic and recreational activities reduce tranquillity in some parts, there are also significant areas of Chichester and Pagham Harbours which have a tranquil character and retain a sense of remoteness”.

24. The Guidelines also identifies the key issues (at that time) relating to change as follows:

- *"Gradual reduction of the tree and hedgerow cover especially on the Chichester Harbour peninsulas.*
- *Gradual reduction of bordering grassland and scrub.*
- *Pressures for harbourside development, particularly the intensification of existing plots and introduction of suburban form, styles and materials.*
- *Active recreational pressure and seasonal visitor pressure, including marina expansion and development and demand of more water sports facilities.*
- *Traffic generation resulting in erosion of rural lanes and loss of tranquillity.*
- *Climate change may increase the risk of storm surges and storminess with associated flooding and consequent impacts on inter-tidal habitats, increasing pressure for possibly insensitive coastal defences.*
- *Management and possible realignment of sea defences due to predicted sea level rises will have significant implications for landscape over the coming decades".*

25. The Guidelines also identifies the key landscape and visual sensitivities of the LCAs (at that time) as follows:

- *"Increasing noise due to traffic and recreational activity eroding tranquillity.*
- *Inappropriate harbourside development. Settlement character of the area as a whole is mixed, with both traditional harbourside settlements and villages contrasting with more recently developed holiday and residential estates.*
- *Coastal strand line litter.*
- *Seasonal and weekend visitor pressure.*
- *Relationship of views between the harbours and surrounding hinterland.*
- *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".*

26. The Guidelines suggest the following land management guidelines for the area, some of which are relevant to the Site:

"Conserve existing area of tranquil character.

- *Maintain keys views and vistas around the harbours.*
- *Maintain the historic character of the area including old oyster beds, historic sea defences, traditional boatyards.*
- *Conserve and manage the diverse existing natural landscape features, including mudflats, salt marsh, sand dunes, shingle banks, woodland, rifes and ditches.*
- *Assess options for Harbour coastal management in a comprehensive way, reflecting the dynamic and interdependent processes of coastal erosion and deposition. Where practicable, favour 'softer' coastal management solutions such as coastal retreat or seek sympathetic design of any engineered defences.*
- *Conserve and enhance the character and setting of the villages.*
- *Conserve and enhance harbourside wooded settings and avoid the introduction of suburban styles, forms and materials. Carry out a colour and design study for new and existing harbourside buildings.*
- *Discourage land reclamation.*
- *Ensure that water related uses are compatible with conservation considerations.*

- *Restrict visitor access to sensitive areas.*
 - *Encourage farmers to enter into Stewardship Schemes where appropriate.*
 - *Encourage measures to reduce litter.*
 - *Strengthen the existing landscape framework through hedgerow and native tree planting, especially around settlements on Chichester Harbour peninsulas and to the north of Chichester Yacht Basin.*
 - *Encourage the planting of new small woodlands (approximately one hectare or less) and hedgerows behind the waters edge.*
 - *Maintain existing hedgerows and strengthen the wider network through hedgerow restoration.*
 - *Promote the control of growth along the waters edge of alien plants such as Common Cord-grass (*Spartina anglica*), green algae and Sargassum seaweed, which restrict the development of endemic saltmarsh plants.*
 - *Maintain, restore and enhance floodplain woodland and associated species, including native black poplar, where appropriate*". (My underlining)
27. In addition to the above, West Sussex County Council have completed a "Local Distinctiveness Study of West Sussex" and prepared 5 regional local distinctiveness guidance sheets to complement and expand upon the existing West Sussex Land Management Guidelines. The Site and surrounding area lie within the South Coast Plain local distinctiveness area and suggests the following strategy for maintaining local distinctiveness of the area, some of which are relevant to the Site:
- "Maintain, protect and enhance where possible:**
- *The existing pattern of dispersed farmsteads and associated agricultural land and woodland;*
 - *The sense of remoteness of small coastal and coastal inlet settlements;*
 - *The scale, vernacular style, massing and materials of rural and village buildings;*
 - *Existing country houses and their settings while avoiding further erosion of the rural character, use and pattern of the landscape;*
 - *Conservation areas, listed buildings and their settings;*
 - *The sympathetic integration of larger settlements into the landscape, allowing open views out where the existing pattern allows;*
 - *Green gaps between the coastal towns and villages*
 - *Rural character of the local road network through sensitive and appropriate design and signage*". (My underlining)
28. West Sussex County Council (in conjunction with East Sussex County Council, Brighton & Hove Unitary Authority and English Heritage) published in August 2010, the "Historic Landscape Characterisation of Sussex". This identifies the Site and surrounding parishes as lying within HLCA No.25 – "Selsey Bill and Chichester Harbour" which covers an extensive area forming a continuous historic character area that extends from the edge of Chichester Harbour, in the west and north west, to Selsey and edge of Pagham Harbour in the east and northwards from the coast to Birdham.
29. The "Chichester Harbour AONB Landscape Character Assessment" (CHAONBLCA) is also relevant to the Site and surrounding area. Although the CHAONB Landscape Assessment

focuses on the landscape character and aspects of the landscape within the AONB boundary, it also includes an assessment of the landscape surrounding but outside the AONB boundary although this is 'high level' character assessment.

30. The CHAONBLCA identifies the Site and surrounding area (and much of the Manhood Peninsula) as lying within Area I1 - West Manhood Peninsula LCA, part of which lies within the Chichester Harbour AONB with the southern and eastern parts outside the AONB. The landscape to the south of Area I1 is identified as Area F2 – Wittering Coast. The key characteristics of the "West Manhood Peninsula" LCA are defined as follows:

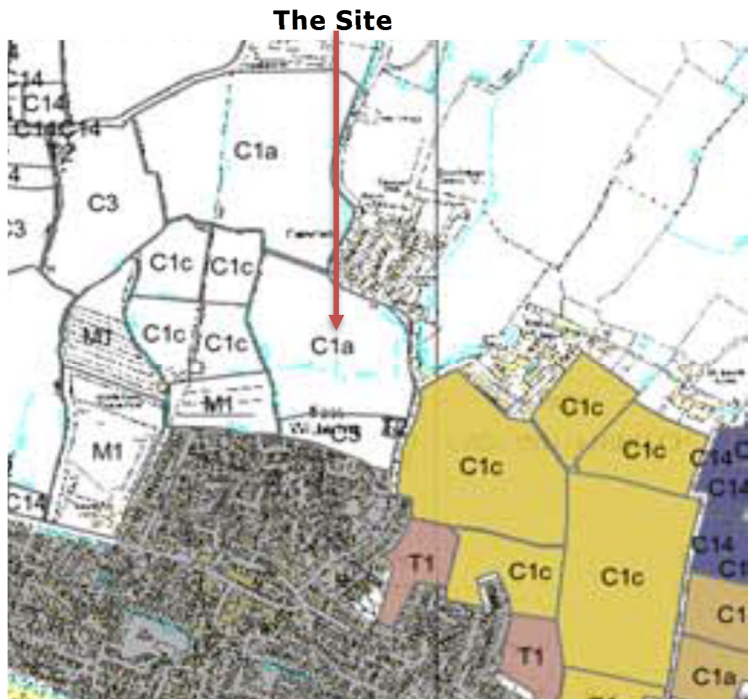
- *"Broadly flat land overlying brickearths, intersected by small streams or rithes.*
- *Predominantly open arable farmland with medium to large scale field patterns.*
- *Small scale hedged paddocks, concentrated around the villages, have an intimate character.*
- *Parkland estate landscape at Itchenor and Westlands enclosed by treebelts and copses.*
- *A wide range of habitats including unimproved coastal grassland, small ancient woodlands, marshes along the River Lavant, and Birdham Millpond contribute to character.*
- *Historic north to south road and settlement pattern.*
- *Dispersed modern roadside development along the A286.*
- *Distinctive clusters of flint and brick cottages at Itchenor, Birdham and Dell Quay.*
- *Wide views of harbour from coastal path in the south west and views across farmland to Chichester Cathedral in the north.*
- *Birdham Pool and Chichester Marina are major recreational centres.*
- *Overall the area retains a largely rural undeveloped character". (My underlining)*

31. The CHAONBLCA describes the overall character of the area as follows:

"This large character area comprises mainly open arable farmland with medium to large scale field patterns and pockets of small hedged pastures and paddocks around the villages. The arable fields are divided by low hedgerows or by lines of windblown oaks. There is generally very little woodland giving most of the area an open character. However, there are a number of small woodlands, copses and treebelts along the coastal edge which contribute to the impression of a wooded shoreline. Within the AONB there are occasional framed views of the water and yachts. There are also important views to Chichester Cathedral in the north of the area around Apuldram. The arable farmland around Dell Quay and New Barn has a wooded coastal edge and the historic quayside at Dell Quay has attractive framed views over the water. South of here the linear settlement of Birdham is surrounded by small hedged fields and paddocks. At West Itchenor and Shipton Green there is also a linear settlement pattern with mixed historic and modern development ending in the distinctive historic quayside of West Itchenor. From here southwards to West Wittering long to medium scale arable farmland with occasional woodlands and treebelts are concentrated along the coastal edge. To the east is an extensive area of glasshouses and medium to large scale arable land outside the AONB. Some views towards the AONB are possible from here but lacks views of the water".

32. The CHAONB assessment then goes on to assess the historic features, ecological features, views, settlement character and condition of the landscape within the AONB boundary but identifies a number of key issues likely to impact on the AONB including:
- *"Sea level rise.*
 - *Past loss of hedgerows.*
 - *Potential pressure for large new farm buildings and glasshouses, both within and outside the AONB.*
 - *Expansion of horse grazing, together with other small scale incremental changes.*
 - *Visual intrusion from existing harbourside housing development.*
 - *Potential pressure for additional harbourside housing development.*
 - *Potential strategic development southwest of Chichester outside the AONB designated area*.
33. The CHAONB assessment sets out a number of Planning and Land Management Guidelines all related to development within the AONB apart from *"Consider possible visual impacts of any large scale glasshouses and shed development outside the AONB"*. Although this guideline refers to 'glasshouse and shed development', similar considerations could apply to residential development within the setting of the AONB.
34. The CHAONB Management Plan 2014-2019 includes policies seeking to promote the conservation and enhancement of the special qualities of the AONB and its setting, raise awareness of the AONB designation and seek to provide guidance to developers to ensure that development is appropriate within the AONB and its setting. However, the Management Plan provides no details or extent of the area forming the setting of the AONB. The Conservancy have also not published a "Position Statement" on the setting of the AONB.
35. However, in most circumstances, the setting comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen. The setting may be wider however, for example when affected by features such as noise and light. In some cases, the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area maybe substantial for example where there is a contrast in topography between higher and lower ground.
36. Based on the preliminary assessment of the Site and its surroundings it is unlikely that the Site could be considered as forming part of the setting of the Chichester Harbour primarily due to distance (approximately 2 kilometres from the AONB boundary), the low lying topography of the area and intervening natural barriers (hedgerows and belts / blocks of trees) and built development to the north and west of the Site.
37. Chichester District Council have not produced a stand-alone Landscape Character Assessment of the District but have published a number of 'high level' Chichester District AONB Landscape Capacity Studies (Capacity Studies carried out in 2009, 2011 and 2018) to inform to adopted Chichester Local Plan - Key Policies 2014 - 2029 and the current emerging Chichester Local Plan Review for the period up to 2035.
38. By reference to the 2009 / 2011 Landscape Capacity Studies (LCS), Figure HDA2 and HDA19 (and in Appendix A – Table B: Local Landscape Character Types), the Site is identified as

being within LCT C1a – Large - scale arable enclosed with the north eastern parts of Scotts Farm Holiday Village / Camping as also in arable use (C1c) and the western and southern parts of Scotts Farm identified as M1 – Mobile Home / Caravan Park. The fields to the east of Church Road are identified as LCT C1c – Large - scale arable semi-open. See below.



Extract taken from Figure HDA19 – South (taken from 2011 LCS) indicating landscape character types

39. Also by reference to Figures HDA3 and HDA20 of the LCS (and Appendix A – Table C – Local Landscape Character Areas) they identify the Site as forming the southern part Sub-area 106 – “Furzefield Western Coastal Plain” whilst the land to the east of Church Road is identified as Area 146 – “East Wittering Northern Coastal Plain”. The key characteristics of Sub-area 106 (see LCS dated 2009 – Appendix A – Table C – Local Landscape Character Areas) are defined as follows:

- *“Coastal plain;*
- *Predominately fairly large, semi-enclosed arable fields;*
- *Bounded by small scale enclosed fields to the west, areas of settlement to the east, and by East Wittering and caravan park to the south;*
- *Gaps in vegetation allow filtered views of settlement at the periphery of the character area, including Holmes Farm, Speedscroft, Rife Cottages, Furzefield:*
- *East Wittering visible from various locations around the character area;*
- *No view of Chichester Harbour;*
- *Provides part of overall separation between West Wittering, East Wittering and the numerous small groups of settlement to the east”.*

40. The key characteristics of Area 146 – East Wittering Northern Coastal Plain (see LCS dated 2011 – Appendix J – Table D – Local Landscape Character Areas) as follows:

- *"Coastal Plain;*
- *Bounded by East Wittering to the south and southwest, business and farm buildings to the north and by enclosed parcels of land within character area to the east;*
- *Consists of relatively large semi-enclosed arable fields with playing fields to the south adjacent to East Wittering;*
- *Landform dips slightly towards watercourse running roughly north-south through the centre of the character area;*
- *Hedges and trees with gaps along field boundaries and watercourse;*
- *Urban edge of Easting Wittering visible to the south;*
- *Intervisibility between East Wittering and buildings to the north and northeast, limits visual separation function of the character area".*

41. The 2018 draft Landscape Capacity Study Review (LCSR) prepared by "terrafirma" Landscape Consultancy has taken a slightly different 'high level' approach to the assessment process in that it assesses to landscape attributes, and visual attributes of the sub-areas identified in the previous 2009 and 2011 Landscape Capacity Studies which were completed by Hankinson Duckett Associates. However, in Section 3.0 - Landscape Character Assessment, the 2018 Study states that:

"The 2018 Study does not include a new local landscape character assessment of the study area. The landscape character areas were therefore taken as the starting point. In order to undertake an assessment of the comparative sensitivity and landscape capacity of the sites, it was important to undertake a more detailed assessment of the sub-areas, individually and in comparison with each other, to ensure a consistent approach. This assessment work can be found in the record sheet and report for each sub-area (see Sections B-F)". (My underlining)

42. The 2018 draft LCSR assess LCA 106 – Furzeffield Western Coastal Plan in Section C (pages 94 to 103). The first section refers to other landscape character assessment including the previous Chichester District AONB Landscape Capacity Study (Zone 15) and includes an extract Sub-area map for Area 106 but does not highlight or quote the relevant key characteristics of Area 106, (as set out in the 2009 LCS Appendix A – Table C – Local Landscape Character Areas), but describes the area as follows:

"Sub -area 106 is a large sub-area extending north of East Wittering, beyond the B2179, with the arable farmland north of the B2179 within the AONB. The area is largely made of arable fields, with Piggery Hall / Church / Chapel Lanes forming much of the eastern edge, and East Wittering the southern edge. To the west lies further arable farmland and camp sites at Nunnington and Scott's Farm".

43. The remaining pages 98 to 102 of Section C set out the conclusions of the assessment, as a series of bullet points, dealing with landscape attributes, and visual attributes, sensitivities, value of the LCA and its overall capacity. The conclusions, recommendations and potential capacity of the Sub-area are set out on page 103 and state:

"Sub-area 106 has a low capacity, constrained by its location partly within the AONB, and its general rural and undeveloped character.

It is possible that a very small amount of development may be accommodated outside the AONB within or around existing settlements or clusters of form provided it is informed by further landscape and visual impact assessment and sensitivity integrated into the landscape although great care would need to be taken to avoid and landscape or visual harm. Particular care would be needed to protect the existing heritage assets, the historic settlement pattern and local distinctiveness".

44. Based on this preliminary assessment of the Site and its surroundings, and notwithstanding the conclusion of the draft 2018 LCSR, (and its more detailed assessment of the Sub-area), this assessment indicates that the Site (south eastern parts of Sub-area 106) is:
 - a) slightly different in terms of its landscape character and visibility when compared with areas to the north;
 - b) is not within the setting of or influence of the Chichester Harbour AONB and;
 - c) the Site has some traits and similarities with the land to the east of Church Lane.
45. Further comments on the 2018 draft Landscape Capacity Study Review are set out later on in this report.
46. Given the above, the introduction of residential development within the Site would, however, need to be designed to take account of the above assessment, as far as possible although some the land management guidelines are not directly relevant to the development of the Site for housing.

Visibility:

47. As mention above, there are no public rights of way across the Site, although a section of Public Footpath No.14 follows part of the northern boundary of the Site and extends from the Piggery Hall Lane westwards to connect to Elms Lane. The footpath is well-used and there is some evidence of informal access into the Site from sections of the footpath by possible dog walkers but little evidence within the Site of this use. Immediately adjoining the Site, there are partial and glimpsed views from short section of the footpath whilst the west there are more open eastwards views from the footpath.
48. To the west of the Site, Footpath No.14 connects to Public Footpath No.15 which extends from Cakeham Road / B2179 on north – south alignment through Scotts Farm Holiday Village / Camping Site to connect to Elms Lane / Chapel Lane near Speedscroft. There are open views towards the Site from some sections of this footpath although from the southern section of the path within Scotts Farm Holiday Village / Camping Site views are curtailed by intervening residential development.
49. To the west of Footpath No.15 is Public Footpath No.16 which also extends northwards from Cakeham Road / B2179 initially following the western edge of Scotts Farm Holiday Village before following existing field boundaries to connect to Elms Lane near Scotts Farm. There are no views from this footpath for the majority of its length as the views are screened / curtailed by Scotts Farm Holiday Village development although there are very few glimpsed

views towards the Site which are possible through the hedgerows / trees adjoining the northern part of the footpath.

50. To the north of Elms Lane (and Scotts Farm) is Public Footpath No.17 which extends northwards following field boundaries and open arable fields to connect to Public Footpath No.18 and then continues northwards to connect to the B2179 near Emery Cottages. Public Footpath No.18 extends eastwards from Footpath No.17 across an open field to connect to Chapel Lane at its junction with Acre Street. There are open middle views looking south eastwards towards the Site from sections of these footpaths, but the open parts of the Site is effectively hidden from view and the Site contributes in a limited way to the character and visual appearance of the area.
51. To the east of the Site, and Church Road, is Public Footpath No.3 which follows a section of Church Farm Lane to Church Farm Cottage and then continues to follow the lane eastwards to connect to Stubcroft Lane before turning southwards following Stubcroft Lane to connect to the B2179 / Stocks Lane within East Wittering. Immediately to the west of Church Farm Cottage, Public Footpath No.5 extends northwards from Footpath No.3 and connect to Public Footpath No.8 near Hale Farm before turning west passing Hale Farm to connect to Piggery Hall Lane at its junction with Acre Street. There limited views towards the Site from a short section of Footpath No.3 near Church Road with the open parts of the Site screened from view and views extending over the Site to the housing on Sandpiper Walk.
52. To the east of Hale Farm, Footpath No.8 becomes Public Footpath No.6 and No.7 with Public Footpath No.6 extending eastwards following field boundaries to connect to Tile Barn Lane and the B2198 whilst Public Footpath No.7 extends northwards following existing field boundaries to connect to the B2179 near Huntlands and Guy's Farm. There are no views or views are curtailed towards the Site from these footpaths.
53. In addition to the above, there are transitory views towards the Site from sections of Church Road and Piggery Hall Lane adjoining the Site and on the approach to the Site from the north, as well as partial transitory views from a short section of Church Farm Lane to the east (close to the Site) and more distance transitory glimpsed and open views from sections of Elms Lane to the north west and short section of the cycleway on Cakeham Road / B2179 (north of Cakeham Stables) looking north eastwards.
54. Based on the preliminary site visit, the open parts of the Site are only perceived from near distance views from a short section of Church Road / Piggery Hall Lane and Public Footpath No.14 on the north western boundary of the Site. Elsewhere the Site is generally screened and contained in the landscape in near and middle distance views due to its boundary vegetation of hedgerows and trees and the intervening framework of hedgerows and trees / small copses within the landscape to the north, and east with taller trees on the northern edge of the Sandpiper Walk development forming the backdrop. Whilst in vantagepoints to the south west, from Cakeham Road / B2179, the intervening hedgerows and wind swept trees effectively screen views towards the Site.
55. Open views towards the Site are mainly from a section of Church Road, section of Piggery Hall Lane and on the northern approaches to the Site, and sections of Footpath No.14 and No.15 to the west with transitory open views from a short of section of Elms Lane to the north west (where 2 storey development on the Site would be perceived). However, apart

from views from Church Road and Piggery Hall Lane, the open parts of the Site are screened from views by the Sites boundary vegetation with the Site seen in the context of the developed edge of East Wittering including Scotts Farm Holiday Village (permanent mobile homes) or the Furzeffield housing development to the north east or east depending on the viewpoint. East Wittering Business Park is also perceived in some views but in it anticipated the visibility of the business park building will reduce during the summer months when trees are in leaf.

56. The assessment indicated that apart from the vantagepoints referred to above, there were no other middle and long distance views (i.e. views in excess of 500 metres) towards the Site where the Site and adjoining development (i.e. Furzeffield housing area and northern edge of East Wittering) is readily perceived.
57. On the basis of the initial visual assessment, it is considered that the north western parts of the Site are more visually sensitive to change as the introduction of housing development here would be adjoining areas of open countryside where the relationship with the East Wittering / adjoining houses (Furzeffield) is weaker and the development would be evident in most views albeit they are local views, mainly from adjoining footpaths, and longer distance views towards the Site to the west and north. Development within the eastern and southern parts of the Site would minimise the change perceived but would be seen in the context of development on the edge.
58. There would be some (major / moderate) impact on private views from properties adjoining the Site (northern edge of Sandpiper Walk to the south of the Site and houses fronting Piggery Hall Lane to the north east) where they have open views of the Site, however, the introduction of areas of landscape planting adjoining these properties would minimize the likely visual impacts.

Trees:

59. As mentioned earlier, there is a scarcity of mature trees and blocks of woodland in the landscape apart from a small copse situated at the junction of Church Road and Church Farm Lane, trees surrounding East Wittering Business Park / Church Farm Retirement Home and adjoining church to the east, evergreen trees forming part of the southern boundary to the Site and line of wind swept trees adjoining Footpath No.14, forming part of the Site boundary to the north east. It is important that trees within and adjoining the Site are retained and form a constraint to development (subject to tree / hedgerow root protection zones and shading areas) with the majority of the Site devoid of vegetation and therefore not constrained for this reason.
60. Subject to the area identified for development (see comments below), those hedgerows / trees located within and on the Site's, boundaries should be subject to a detailed tree condition survey and the protection distances for these hedges / trees / groups of trees should constrain the developable area where vegetation is deemed worthy of retention.
61. A Phase 1 Habitat survey and survey of protected species should be undertaken as ecological features within the Site may also constrain the developable area.

62. Opportunity to increase tree cover and also manage the hedgerows / trees within and adjoining the Site = benefit.
63. Opportunity to enhance the few wildlife / habitats within the Site, create new habitats and also manage the ecology / landscape = benefit.

Access to the Site:

64. At present, access to the Site can be obtained via the existing farm access on Church Road to the north of Church Farm Lane. In addition there is a further disused access off Piggery Hall Lane.
65. It is suggested that a detailed tree / hedgerow condition survey should be undertaken of the roadside hedges and trees within / adjoining the Site to determine their value and determine the full extent of vegetation to be lost in order to identify the scope for any mitigation measures that might be appropriate.

Landscape Planning:

66. The Development Plan for the District consists of the 2018 NPPF, and the Chichester Local Plan: Key Policies 2014 – 2029. The Council are currently reviewing the Local Plan in order to identify locations for future development outside the current urban area and therefore there is an opportunity to promote the land for residential development through the Local Plan review process.
67. The adopted Local Plan does not contain a specific policy relating to landscape alone but contains a number of policies that relevant to landscape issues. These include: Policy 45 – Development in the Countryside, Policy 47 – Heritage and Design, Policy 48 – Natural Environment, Policy 49 – Biodiversity, Policy 50 – Development and Disturbance of Birds in Chichester and Langstone Harbours SPA, Policy 52 – Green Infrastructure, and Policy 54 – Open space, Sport and Recreation. Policy 43 – Chichester Harbour AONB is not considered applicable / relevant as the Site does not lie within the AONB or its setting. Appendix A of the Local Plan also refers to 'Green Infrastructure' and provides guidance on the issues relevant to the design of housing layout and green spaces following the principles of green infrastructure.
68. The Local Plan Proposals Map indicates that the Site lies outside the built-up area boundary of East Wittering and within open countryside which a number of the policies in the adopted Local Plan seek to protect from development – see above. However, the Site is not located within a designated landscape such as AONB / SLA / AHLV etc.
69. The Council have published, as part of the background evidence base for the emerging Local Plan, many technical reports including: a draft 2018 Landscape Capacity Study Review which is referred to earlier (Paragraph No's. 41 to 44) in the report. The LCSR indicates the Sub-area within which the Site is location has a 'low capacity' but goes on to state:

"It is possible that a very small amount of development may be accommodated outside the AONB within or around existing settlements or clusters of form provided it is informed by further landscape and visual impact assessment and sensitivity

integrated into the landscape although great care would need to be taken to avoid and landscape or visual harm. Particular care would be needed to protect the existing heritage assets, the historic settlement pattern and local distinctiveness"

70. The assessment acknowledges that some development within the area is possible around existing settlements or clusters of built form which in this case relate to East Wittering to the south and Furzefield to the north, with East Wittering Business Park to the east albeit this development does not have a strong influence on the character of the Site itself.
71. With reference to the above, it is considered that the release of the whole or part of the Site for development would require a good / strong planning (including a shortfall in the 5-year housing supply figures) case to promote the Site through a Planning Application although there are few landscape and visual issues such as the character of the Site (this will be fundamentally changed from countryside to urban although this would occur on virtually all 'greenfield' sites) and impact on the views available assessed as part of an LVIA submitted with an application.
72. If promoted through the local plan process a similar evidence base would be required at each stage of the process, including an LVIA or similar report demonstrating how the impacts on landscape character and views have been 'moderated' and the proposals integrated into the Site and locality.

Conclusions:

73. The initial landscape appraisal of the land indicates that the Site is capable of accommodating housing development with limited or minimal impacts on landscape character and views. See attached plan – 0366/LSK1-Preliminary Landscape Appraisal / Constraints Plan, and 0366/LSK2 – Landscape Opportunities Plan.
74. The initial appraisal indicates that the eastern and southern parts of the Site are most appropriate to develop for housing to minimise landscape and visual impacts. These parts of the Site relate well to the built up edge of East Wittering and housing at Furzefield and whilst perceived in some views the development would be seen in the context of existing development when seen from the wider surrounding area minimising the change perceived.
75. The initial appraisal also indicates that the north western parts of the Site are the most sensitive parts of the Site, as the introduction of housing development here would be adjoining areas of open countryside where the relationship with the East Wittering is weaker and the development would be evident in views albeit they are local views, mainly from adjoining footpaths, and longer distance views towards the Site to the west and north.
76. Notwithstanding the above it is considered that careful consideration would need to be given to the density, scale and type of development within the northern and western parts of the Site to form a transition (lower density housing) between the development and open countryside areas to the west and north. It is also considered important that the existing hedgerow and trees along the western, and northern boundaries of the Site are retained and wide buffer of open space be provided to set back the housing from these boundaries in order to minimize the impact of the proposed houses on views towards the Site. The retention of the existing hedgerow and drainage ditch through the central parts of the Site

also provides an opportunity to incorporate a 'green corridor / green infrastructure' within the Site providing east to west connectivity and internal green space within the development.

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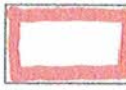


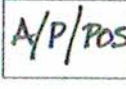

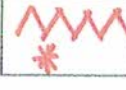




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PLANS - Drawing No. 0366 / LSK1 - Landscape Appraisal Plan



Note: Scaling on the drawing cannot be assured.

LEGEND

-  SITE BOUNDARY
-  EXISTING TREES / CONIFERS
-  HEDGEROWS (Trimmed / Tall)
-  LAND USES (Arable / Pasture / Grass POS)
-  VIEWS (Long/ Local/ Glimpsed)
-  HARD URBAN EDGE / NOTABLE BUILDINGS
-  PUBLIC FOOTPATHS
-  EXISTING ACCESS POINTS
-  MODERATELY VISUALLY CONTAINED AREA
-  LEAST VISUALLY CONTAINED AREA



Project:
**LAND WEST OF CHURCH ROAD,
 EAST WITTERING, CHICHESTER
 PO20 8PS**

Drawing Title:
**LANDSCAPE APPRAISAL
 /CONSTRAINTS PLAN**

Status: **INITIAL ADVICE**
 Date: 28-01-2019 Scale: 1:5000@A3 Drawn by: DHW

Project No: **0366** Drawing No: **LSK1** Revision: ---

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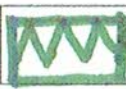
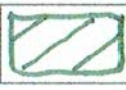


EAST WITTERING CP

PLANS - Drawing No. 0366 / LSK2 - Landscape Opportunities Plan



Note: Scaling on the drawing cannot be assured.

LEGEND

-  SITE BOUNDARY
-  EXISTING TREES/VEGETATION (Retained where possible)
-  LANDSCAPE CONSTRAINT
-  PROPOSED STRUCTURAL LANDSCAPE BUFFERS
-  PROPOSED LANDSCAPED OPEN SPACE
-  POSSIBLE ACCESS POINTS (Vehicle / Pedestrian)
-  POTENTIAL DEVELOPABLE AREA




Project:
**LAND WEST OF CHURCH ROAD,
 EAST WITTERING, CHICHESTER
 PO20 8PS**

Drawing Title:
LANDSCAPE OPPORTUNITIES PLAN

Status: **INITIAL ADVICE**
 Date: 28-01-2019 Scale: 1:5000@A3 Drawn by: DHW

Project No: **0366** Drawing No: **LSK2** Revision: ---

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EAST WITTERING CP