

Schedule of issues relating to the Fernhurst Neighbourhood Plan submission

Members are asked to agree the contents of the table below. The identified issues will form the basis of the South Downs National Park Authority's (SDNPA) representation to the Examiner.

Introduction (general comments)	It is to be welcomed that there is clear signposting of national planning policy relevant to National Parks at the very start of the document. This means that users of the Plan will be aware of the distinctive way planning operates in such an area. The Defra Vision and Circular for English National Parks is also helpfully referenced. Helpful clarification is provided in para. 1.24 that the Neighbourhood Plan does not deal with minerals and waste matters, including fracking. This makes the scope of the neighbourhood plan clear and accords with planning legislation which states that a neighbourhood plan is not permitted to deal with certain types of 'excluded development'. ¹
Application of National Park Duty	The introduction is, however, somewhat selective in its reference to the Duty. Its application needs to be clarified. It is agreed that the Defra Vision and Circular for English National Parks makes reference to the importance of delivering affordable housing (in para. 78 and 79). However, the Circular makes it clear that authorities should give priority to the purposes and that social and economic matters are secondary, for instance: " <i>Authorities should continue to focus their expenditure on the delivery of the statutory purposes, whilst seeking to maximise the socio-economic benefits</i> " (para. 66).
Partnership Management Plan	Factual update (para. 1.13 and 1.15): the Partnership Management Plan has been adopted by SDNPA.
Para. 1.23	Typographical error – the comments made on the draft Plan and how they were taken into account is set out in the Parish Council's Consultation Statement, submitted alongside the Neighbourhood Plan. The final sentence of the paragraph is incomplete.
Chapter 2	This acts as a 'parish profile' and helpfully draws the reader's attention to the South Downs Integrated Landscape Character Assessment, the socio-economic make-up of the parish and the two designated conservation areas (Fernhurst Village and Kingsley Green). It identifies the loss of the major employer in the Parish in the early noughties, which to some considerable degree has guided the Parish Council's policy framework.
Chapter 3	The Plan was prepared in response to the following question: " <i>What will a sustainable parish of Fernhurst look like in 15 to 20 years time?</i> " (para. 3.1) A wide range of planning concerns were identified in SDNPA's/Fernhurst Parish Council's Front Runner application as drivers for preparing a neighbourhood plan. The Working Group developed a Vision

¹ Excluded development is defined in TCPA Act 1990 section 61K and Schedule 1: (a) A 'county matter' relating to minerals, (b) Any operation or class of operation relating to waste development, (c) Development that falls within Annex 1 to Council Directive 85/337/EEC and (d) Development consisting wholly or partly of a national infrastructure project.

	<p>considered to be locally distinctive and realistic. It contains echoes of the National Park's special qualities, aligns with policies in the SDNP Partnership Management Plan (e.g. Policy 50) and the planning system's role in ensuring the provision of infrastructure (para. 7 of the NPPF). The objectives of the Plan are supported, however the overarching aim of the Plan (para. 3.8) should make acknowledgement of the statutory purposes for National Parks which must be taken into account when all planning decisions are made.</p>
Para. 4.20 and para 4.48	<p>It is accepted there may be a need for some intermediate housing but the high house prices in Fernhurst suggest this may still be an unaffordable option for many. No Housing Needs Survey has been undertaken to establish what might be a realistic level of supply for this tenure. This is important in the context of a FNP policy which seeks a slightly higher proportion of intermediate housing than identified in the Strategic Housing Market Assessment. The Housing Authority (Chichester District Council) is expected to be make its own representation on these matters.</p>
Para. 4.29 and Policy HI	<p>The policy seeks to manage the pace at which development is delivered and give particular priority to sites allocated in the neighbourhood plan. However, the policy should acknowledge that rural exception sites could potentially still play a legitimate part of housing delivery, in addition to site allocations and infill developments. Further comments on this matter are made in the sections on Sustainability Appraisal and Landscape Visual Impact Assessment below. Paragraph 54 of the NPPF recognises that rural exception sites can help address local housing need in response to changing local circumstances. Outside settlement policy areas, the Chichester District Local Plan (Policy H9) states that residential development will only be permitted if it provides affordable housing and meets various other criteria, including that the site is modest in scale and relates well, in terms of location and size, to the existing settlement. While there is a degree of conflict between the saved policy and the NPPF, it is only in relation to whether or not to allow market housing in support of rural exception proposals. The broad thrust of the approach remains valid.</p> <p>It must be questioned whether all of the housing allocations would be/could be made sustainable locations for development. The removal of the Hurstfold allocation is sought. If this site cannot come forward for development, then there would be pressure on the Syngenta and Bridgelands allocations to meet the remaining housing need. Any proposal for Syngenta which accords with the FNP policy would need to demonstrate the requirements of para. 116 of the NPPF have been met – itself a demanding policy requirement. The Plan needs to recognise the potential role of other suitable sites being required to address the parish's housing need.</p> <p>If reference to exception sites is added to the policy, the final paragraph would need to explain that market housing would only be permitted on such sites where it was necessary for the viability of an affordable housing scheme.</p> <p>It is unclear how the review of evidence by Fernhurst Parish Council would work in practice. It would be the LPA's role to assess this material as the appropriate decision making body.</p>
Policy 4.42	<p>The last sentence is factually incorrect. SDNPA will continue to give weight to this document as it was adopted by the Authority on becoming an LPA in 2011 until such a time as SDNPA deletes it and/or adopts new guidance.</p>

Para. 5.2	Policy HI of FNP does allow infill development but doesn't specify a requirement for market housing only to be occupied households with a local connection. Similarly any other sites in the settlement policy area which come forward in accordance with HI also are not required to be occupied by households with a local connection.
Policy SA1: Oil Depot Site	A planning application for this site was granted planning permission in April 2014 (SDNPA/I3/05945/FUL).
Policy SA2: Former Syngenta site	<p>Very many of the general principles and thematic policy requirements are supported and will be fundamental in ensuring an appropriate development comes forward on this very large site in the National Park. It is welcomed there is reference to the National Park Purposes and Duty (para. 5.15) and the outcomes of the SDNP Partnership Management Plan. It is accepted that the <i>“task of reflecting and justifying an appropriate mix and scale of development in such a location is a challenging one”</i> and that the Neighbourhood Plan has been prepared in the context of the housing requirements in the Chichester District Local Plan being out-of-date (HI of the Local Plan). The Strategic Housing Land Availability Assessment (SHLAA) pre-dates the National Park designation. SDNPA is now undertaking a comprehensive SHLAA review (for the entire National Park).</p> <p>As the Syngenta site was/is in commercial use, policies relating to the retention of commercial uses still apply, although these have to read in terms of their consistency with the National Planning Policy Framework. The SDNP Local Plan - Options Consultation Document (Issue 29) asks what approach SDNPA should take for the redevelopment of major brownfield sites (Syngenta is identified as 1 of 3 such sites in the National Park). Comments received will inform any policy relating to this issue when the Authority publishes its 'Preferred Options' in 2015. The site is unusual in that it is not especially visible in the immediate landscape, although it can be seen clearly from more elevated locations in the Parish, e.g. Blackdown Hill amongst others.</p> <p>Any proposal must demonstrate the exceptional circumstances or public interest reason to justify an exception to the presumption against 'major' development, as described in paragraph 116 of the NPPF. In the context of the need for development (including national considerations), Paragraph 47 of the National Planning Policy Framework states that local planning authorities should take action to boost significantly the supply of housing. The first step in such action is for local planning authorities to <i>“use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, in as far as is consistent with the policies set out in this Framework”</i>, the Framework contains policies which restrict development in a National Park– para. 115 and 116 are relevant in this regard. The second step is for local planning authorities to <i>“identify and update a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land.”</i></p> <p>The <i>Chichester District Local Plan 1999</i> sets out the strategic housing requirement for the District only up to 2006. The South East Plan, which previously set the housing requirement for Chichester District over the period 2006-2026 has</p>

been revoked and no longer forms part of the development plan. Given the early stage SDNPA is currently at in developing the SDNP Local Plan, it has not been possible to develop a housing requirement for the National Park as a whole. This will become clearer as a result of the evidence gathering for the Local Plan.

To inform the Local Plan and Neighbourhood Plans, SDNPA is progressing a Strategic Housing Land Availability Assessment (SHLAA) building on the SHLAAs 'inherited' from the previous Local Planning Authorities (e.g. 2010 Chichester District Council SHLAA). This involves reviewing all SHLAA sites against the South Downs National Park Authority's SHLAA Methodology (November 2013). The full site assessment will be published by SDNPA during Summer 2014. The sites in the CDC SHLAA are discussed in further detail under the Sustainability Appraisal section below.

The authorities within the Sussex Coast Housing Market Area (HMA) commissioned a Housing Study to identify objectively assessed housing requirements for each of the authority areas in the HMA. This led to the identification of 480-590 dpa for Chichester District as a whole. Based on past population trends, approximately 26% of the requirement was predicted to arise in the National Park part of the District, equivalent to around 125 dwellings per annum but this is higher than actual completion rates over the last decade of 70 dwellings per annum.

Analysis of large sites alone suggests there will continue to be a supply of sites coming forward for development in the part of the National Park in Chichester District. However, a considerable proportion of this supply is expected to come forward due to the permitted King Edward VII development within Easebourne parish (which shares a boundary with the parish of Fernhurst): 416 dwellings were permitted at King Edward VII hospital, including 79 assisted care units.

The only available information on housing need for the Parish is the Housing Register as there is no up-to-date Housing Needs Survey (Chichester District Council recommended to Fernhurst Parish Council that such an assessment should be undertaken to support the Neighbourhood Plan's evidence base).

The Housing Register (as of 27/05/2014) shows that there are currently 25 households with a local connection to the parish, of which 11 are in bands A-C and considered to have a priority need. 15 of the 25 have expressed an interest in shared ownership properties. 76% of the households are currently resident in the Parish. The highest demand is for small properties (15 of the 25 are seeking 1 bed dwellings). While there is a reasonable turnover of 1 bed dwellings in Fernhurst (34 of these were reallocated 2007-2012), larger properties become available much less frequently.

It is considered that the Syngenta site may have some potential over the plan period. It is clear from the analysis the Parish Council has undertaken that the Oil Depot site (Policy SA1) and the Bridgelands site (Policy SA4) would be unable to meet all of the Parish's housing need and other sites will need to be allocated. In community engagement exercises for

the Neighbourhood Plan, the local community has made very clear their view that “*brownfield sites should be brought forward first...greenfield sites on the edge of the village outside the settlement boundary identified in Policy SBI were not considered appropriate for development and that once alternative sites had been developed, this should represent a limit on further significant development*” (para. 5.2 of FNP). The NPPF is clear that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. Core planning principles in the NPPF are encouraging the effective use of land by reusing land that has not been previously developed, provided that it is not of high environmental value and allocations of land should prefer land of lesser environmental value.

Paragraph 55 of the NPPF is highly relevant to this allocation which states “...*Local Planning Authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: (i) the essential need for a rural worker to live permanently at or near their place of work in the countryside; or where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets (this is not relevant in this case); (iii) where the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting; or the exceptional quality or innovative design of the dwelling. Such a design should: be truly outstanding or innovative, helping to raise the standards of design more generally in rural areas; reflect the highest standards in architecture; significantly enhance its immediate setting; and be sensitive to the defining characteristics of the local area*”.

The implications of the recent planning history for the site are important to consider. A Lawful Development Certificate has confirmed the permitted use of the Highfield buildings. Although dormant at present, the use of the whole planning unit is B1(a) offices but certain individual buildings are an ancillary use (SDNP/13/03520/LDE). SDNPA has confirmed in writing that a change of use from B1 (offices) to class C3 (residential) meets the criteria for permitted development, however further consents would be needed in order to construct the development (SDNP/14/01014/DCOU). SDNPA is hoping to enter into a Planning Performance Agreement with the owner of the Syngenta site.

The policy is broadly supported as it embodies many of the elements set out in a SDNPA/Chichester District Council’s 2011 Development Brief. However, it is recommended changes are made to this policy. Detailed masterplanning of the Syngenta site is to be undertaken which would be able to confirm the most appropriate mix of uses on the site (it is recognised the FNP proposes both the retention of Longfield and the Pagoda building which reduces the developable area). The requirement for 150 dwellings has the effect of hindering the likelihood of new employment activity –and would negatively impact on the viability of the suggested land uses, eg. community/visitor centre. This reduces the prospect of a truly sustainable scheme being delivered capable of meeting National Park Purposes. The National Park Authority would also expect any proposal to maximise opportunities to enhance the Green Infrastructure assets (GI) of the site and improve connectivity with the wider GI network.

	<p>SDNPA commissioned a High Level Viability Review for the Syngenta site in early 2014. An iterative approach was taken whereby the assumed commercial floorspace (B class uses²) alongside the residential was increased whilst monitoring the overall effect on viability. The testing showed that more than 150 dwellings would be required to ensure some commercial floorspace was delivered and 200-250 dwellings would provide more certainty. This doesn't mean that a scheme of this size would be the preferred approach to SDNPA but provides a benchmark of whether the mix proposed in the FNP is realistic and deliverable. The comprehensive redevelopment of the Highfield Building must also take into account the costs of demolishing this substantial building (SDNPA's High Level Viability Assessment 2014 concludes that the rehabilitation of this building is unlikely to be economic).</p> <p>It is important that the employment potential of the site is not entirely lost. Officers in Chichester District Council's (CDC) Economic Development team report an unmet need for accommodation in the district for start-up businesses. There is also a reported deficiency of good quality accommodation in accessible locations. Vacancy rates in Fernhurst appear to be low, the site is well situated on a main road with reasonable access to settlements in the west of the National Park and beyond. No evidence has been suggested by the Neighbourhood Plan or by the landowner/developer to SDNPA that it is not possible to accommodate additional employment uses in this location.</p> <p>The policy wording is too passive in the way it refers to the need for additional commercial floorspace. Rather than suggesting new B1/B2/B8 "shall be permitted", the policy should expect it to be required. There may be some merit in providing additional commercial floorspace on the Longfield site but other parts of the site may also be suitable locations, subject to the detailed design of scheme and overall mix of uses. The reference to concentrating new commercial floorspace at Longfield should be removed as there is no evidence to suggest this is the only suitable part of the site for these land uses.</p>
<p>Status of Area of Outstanding Natural Beauty (in Policy SA2)</p>	<p>The Sussex Downs Area of Outstanding Natural Beauty was revoked upon the designation of the South Downs National Park. The reference to it should be removed from this policy as it is factually incorrect.</p>
<p>Policy SA3: Hurstfold Industrial Estate</p>	<p>The policy should be deleted. The SDNPA has issued pre-application advice on this site (SDNP/13/04822/PRE) for a scheme comprising the erection of 8 houses. It is an unsuitable location for housing development based on extant planning policy. It is well removed from the Fernhurst village settlement policy boundary designated in the <i>Chichester District Local Plan 1999</i>. It is acknowledged that the site performs poorly when it was tested against other employment sites in the District (2009 Chichester Employment Land Review), however this study recommended its suitability as an</p>

² T&C Planning Use Classes Order 1987 (as amended): B uses are: B1 Business a) office other than a use within Class A2; b) research and development of products and processes c) for any industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area); B2 General Industry and B8 Storage and Distribution use for storage or as a distribution centre.

	<p>employment site is kept under review. SDNPA’s Employment Land Review (2012) acknowledged the importance of a network of small, local sites being ‘vital’ to the rural economy.</p> <p>While the estate may not generate significant local employment, it does nevertheless contribute to the rural economy in an area where there are limited alternative premises for business to occupy. This is acknowledged by the Neighbourhood Plan which says “<i>Fernhurst only provides some limited employment opportunities so most people have to leave Fernhurst in order to access jobs</i>” (para. 4.40). All of the units appear to be in active use; there is no convincing reason why they couldn’t be improved to ensure commercial activity remains at this site. Small businesses form the backbone of the South Downs economy. The State of the National Park report 2012 (SDNPA) states that 78.4% of businesses employ fewer than five workers compared to 71.1% nationally. It is also unsurprising given the relatively high cost of housing in the National Park that the numbers of people commuting into work each day is higher than the number commuting out. This is particularly relevant when many jobs in the National Park do not provide the income allowing people to enter the local property market (page 60 and 120 of the State of the National Park report identify this ‘baseline’ pressure). The SDNPA has a duty to foster the socio-economic well-being of communities within the National Park. Policy 48 of the Partnership Management Plan sets out the need to “<i>support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs</i>”. Brian Dodd’s review of the Fernhurst Plan at Pre-Submission stage commented that there “<i>must be questions about the impact which redevelopment might have upon the affected businesses</i>”, including the costs of relocation and potentially higher rents.³</p> <p>The Parish Council has sought to address the loss of employment floorspace by requiring stringent tests are met before any residential units are delivered at Hurstfold. Two sites have been allocated through the Neighbourhood Plan which could accommodate additional B class uses. However, the SDNPA’s High Level Viability Assessment would suggest that the Syngenta site is unlikely to be able to provide this additional employment floorspace with a housing allocation of 150 units⁴. The land allocated in the Plan at Fernhurst Business Park was subject to a previous appeal which was dismissed by the Planning Inspector. It must be questioned whether the proposal of creating additional employment floorspace in this location is deliverable (Appeal decision:APP/L3815/A/08/2078644). Both sites are understood to be under different ownership to the Hurstfold site. There is a requirement in the policy that any existing occupier would be able to access a tenancy on the same terms as they currently enjoy at Hurstfold. While well-intentioned, it must be questioned whether this is realistic when new premises would normally expect to command higher than average rents.</p>
<p>Bridgelands, Verdley Place</p>	<p>It is welcomed that the text refers to the ability of a scheme to “restore and enhance”; which aligns with the landscape management objectives for the Milland Basin (South Downs Integrated Landscape Character Assessment). However, the</p>

³ Pre-Submission Review of Fernhurst Neighbourhood Plan (Draft for Informal Consultation), Brian Dodd: Mediation and Planning Services Limited

⁴ SDNPA commissioned a High Level Viability Assessment for the former Syngenta site from Dixon Searle Partnership (2014)

	<p>wording of the policy could be more definitive in order to provide assurance that a scheme can be delivered which fully responds to the site's setting in a nationally designated landscape.</p> <p>The impact of the proposal on landscape character very much depends on what management arrangements are put in place. It is welcomed that the policy seeks to retain the "predominantly green parts of the site" however it is the long-term management of this area which needs to be assured – the policy needs to be more precise as to how this undeveloped land and the mature trees will be maintained. Particular opportunities could arise from habitat management, succession planting for the mature trees and measures to enhance integration of the site with the surrounding landscape character (e.g. incorporation of new tree planting which is consistent with surrounding tree patterns). While some screening may be necessary to protect residential amenity (as referred to in para. 5.67), this should still be consistent with conserving the local landscape character. Large 'green curtains' insensitively introduced into the landscape may be detrimental to the landscape and appear incongruous with the wider landscape characteristics identified by the South Downs Integrated Landscape Character Assessment (the Milland Basin landscape character area: 'O1').</p> <p>It is suggested the policy includes wording relating to the landscape management of the site (how it can be enhanced now and managed over the longer term), particularly the area of open space. This is necessary to ensure the proposal positively contributes to conserving and enhancing the local landscape character, in line with the first National Park Purpose.</p>
<p>Policy EMI: Additional Commercial floorspace at Fernhurst Business Park</p>	<p>This involves the use of an "existing yard area" to provide new-build to the rear of existing buildings on the estate (para. 13.5). A broadly similar site was subject to an appeal in 2008 (APP/L3815/A/08/2078644). The Inspector concluded that the far south-west of the site until 2007 appeared to comprise of open grassland or similar. He considered it had not been demonstrated that the appeal site was part of the Business Park, nor that the appeal site as a whole was previously developed land. He observed the site's elevated position about 2m above the adjoining area of the Business Park, which would make the proposed scheme visually prominent.</p> <p>The neighbourhood plan policy does not adequately acknowledge this constraint identified by the Planning Inspector: "development of a similar scale and layout to the existing development on the site" could be as large as the appeal development. The creation of a new access onto the A286 would add significantly to the existing impact of the business/industrial park. The site is open to the road and is not well screened. There are already clear views of car parking, industrial activity from the collection of various unconnected industrial building over much of the site. Views would be opened up over the site from the south due to tree removal which would be needed to facilitate this access. The existing residential property facing onto the A286 would be surrounded by industrial activity. This proposal should be removed from the Neighbourhood Plan. This, in turn, heightens the likelihood of the Hurstfold policy being undeliverable. The Fernhurst Business Park allocation does not appear to have been separately tested in the Sustainability Appraisal, although its merits in being located on the A286 (rather than small country lanes) and away from</p>

	ancient woodland are briefly referenced. It is unclear what circumstances have changed since 2009 to justify including the policy in the Neighbourhood Plan.
Policy EE5: Protection of important views from Fernhurst village	The commitment to protect views is welcomed however there is a danger that by singly out specific views for protection, there may be other views which need protecting but become devalued by not being mentioned in the Plan. The critical issue is the effect of development on the overall landscape character of which views/sightlines forms one part.
Policy DE2 – Building Materials	Relevant locally distinctive materials would be Midhurst sandstone and local brick (e.g. Pitsham brickworks).
The Sustainability Appraisal	<p>The SA (and production process) has been reviewed by SDNPA’s Sustainability Officer and this statement will be provided separately to the Examiner.</p> <p>The Sustainability Appraisal tests two main strategic planning approaches, guided by the initial community engagement. One was a brownfield approach (whereby a package of brownfield sites is allocated) versus a greenfield approach reliant only on the use of greenfield sites. Supporting this ‘high-testing’ is an analysis of all the proposed allocations, except Fernhurst Business Park, against the SA testing framework. This finds that the brownfield approach scores much more positively against the SA objectives and has many more “highly positive” effects. The Chichester District Council SHLAA (2010) identified 4 sites in Fernhurst parish in 2010. Three of the sites were considered to be suitable for development and most likely to come forward for development in years 6-10. A fourth site (land south east of Midhurst Road) was included despite some degree of policy conflict:</p> <p><i>“This site is included in this SHLAA pending decisions on the eventual distribution of development. When considered against the provisions of the current Local Plan (the Chichester District Local Plan First Review 1999), this site would be contrary to certain policies (including Policy RE1, restricting development which does not require a countryside location and RE6, development in strategic gaps). However the Local Plan will be replaced by the Local Development Framework (LDF), which will revise and refresh those policies and include a review of settlement policy/built up area boundaries. In that respect this site could be suitable for housing development in the 2nd or 3rd phases of the LDF Core Strategy (ie post 2015, or post 2020).”</i> 2 other sites: Land at Cooksbridge and Land at Woodlands, Vann Common were identified by CDC as having no potential. SDNPA has developed a SHLAA Methodology and is undertaking a review of all SHLAA sites, including sites featured in the District Council SHLAA. It is too early to say whether these sites will be carried forward into the SDNPA SHLAA.</p> <p>The sustainability effects of allocating the individual SHLAA sites has not been considered, only in broad terms through the greenfield option. A “review of all other land and sites around Fernhurst” was undertaken to identify potential sites not identified through the SHLAA (para. 6.7 of the SA). However, this concluded that most of these potential sites would not be available and certain sites were undevelopable because there was no access.</p>

	<p>We have a concern that some sites may not have been given sufficiently rigorous consideration. It may be possible to reduce the potential for negative effects on sustainability through allocating just part of a site or appropriate mitigation measures. An allocation on the settlement edge could enhance the transition between the built-up area and surrounding countryside or contribute to enhanced Green Infrastructure (this would need to be confirmed through more detailed analysis).</p> <p>One of the grounds for the High Court challenge to the Tattenhall Neighbourhood Plan was that the Strategic Environmental Assessment (SEA) had failed to properly comply with the Directive. The claimants view was that the SEA had not adequately addressed reasonable alternative options. The Neighbourhood Plan SA had considered two options – ‘having the neighbourhood plan in place’ and a ‘do nothing’ approach. The High Court Judge concluded the legal requirements of the SEA directive had been met and no other options-testing was reasonably required.</p>
<p>Landscape and Visual Impact Assessment (LVIA)</p>	<p>This was submitted as a supporting document with the Neighbourhood Plan. SDNPA’s Landscape Officer has reviewed the study and considers it does not adequately consider how the existing land uses on the sites relate to surrounding land uses or the landscape character of their setting. It is unclear how the proposed land uses would be able to enhance the setting of the sites. The mitigation options proposed do not consider the possibility of developable areas within any of the Chichester District Council SHLAA sites: the LVIA includes no ‘settlement edge’ impact.</p> <p>The analysis of the SHLAA sites is generic, having been packaged with reference to ‘greenfield sensitivity’ and does not consider them individually within their context. The resulting assessment is not sufficiently site-specific.</p> <p>The Assessment does not consider the townscape of Fernhurst and how development could conserve and enhance this. The Guidelines for Landscape and Visual Impact Assessment, published by the Landscape Institute state that townscape quality should be considered as part of an LVIA. There is no supporting evidence to justify a ‘green-belt’ approach around Fernhurst village.</p>