The Council are reminded of Chichester Harbour Conservancy's response to High Grove Farm submitted for the Preferred Approach consultation.

## PART B

Please <u>use a new form for each representation</u> that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

http://www.chichester.gov.uk/dataprotectionandfreedomofinformation.

To which part of the document does your representation relate?

Page/	Page 113, Highgrove Farm, Bosham	Policy Reference:	AL7
Paragraph Number:	Farm, Bosham		
Do you support, object	, or wish to comment on	this policy or paragraph	1?
(Please tick one answe	er)		
Support	Object 🗵	Have Com	ments 🗌

Enter your full representation here giving details of your reasons for support/objection:

The Conservancy strongly objects to the proposed land allocation a minimum of 250 dwellings at Highgrove Farm, Bosham, for the following reasons:

- It would constitute a major development on the fringe of the AONB.
- · The loss of the buffer zone outside the AONB.
- It would breach the policies of the current AONB Management Plan (LS1, BD1) and the emerging new AONB Management Plan (2019-2024).
- It is within the Site of Special Scientific Interest Impact Risk Zone, which affects the SAC, SPA and Ramsar designations.
- The impact on wildlife with inadequate survey data to support the proposal. These surveys should not be left until a planning application is submitted. No mention of impact on nature conservation.
- The detrimental impact on existing long-distance towards Kingley Vale National Nature Reserve and the South Downs National Park (one of the special qualities of the AONB). This inter-visibility is reciprocated; the views towards Chichester Harbour AONB must be protected.
- It contradicts Paragraph 171, footnote 53, of the NPPF (2018) since some of the
  highest quality agricultural land in the country is found around Chichester Harbour.
  Footnote 53: "Where significant development of agricultural land is demonstrated to
  be necessary, areas of poorer quality land should be preferred to those of a higher
  quality."
- The urbanisation of the countryside (referring to the forthcoming updated AONB Landscape Character Assessment).
- · Unavoidable increased instances light, air, noise, and soil pollution.
- Inadequate wastewater provision and potential impact on water quality, including direct run-off from the site to Chichester Harbour.
- The proposed landscaping and screening would be inadequate mitigation to justify the size of the development.
- It would be contrary to the Spatial Vision outlined in 3.7 (page 24) which states "The
  relationship between the National Park and significant natural areas to the south,
  especially Chichester Harbour Area of Outstanding Natural Beauty will be carefully
  managed by maintaining and enhancing the countryside between settlements."
- It would result in the merging of settlements, thereby not maintaining countryside

gaps (page 82).

The LPA is advised that Section 85 of the CRoW Act of 2000 requires relevant authorities to have regard to the purpose of AONBs 'in exercising or performing any functions in relation to, or so as to affect, land' in these areas.

As the Statutory Joint Advisory Committee (JAC) for the AONB, proper discussion should have taken place with Chichester Harbour Conservancy before the public consultation on the Local Plan.

(Continue on separate sheet if necessary)

## What improvements or changes would you suggest?

The Conservancy objects the inclusion of this site and it should be removed from the Local Plan.

Please note that the Conservancy may support moving the allocation of dwellings to a 'settlement hub', which would potentially not be as sensitive to development Highgrove Farm, Bosham.

(Continue on separate sheet if necessary)

## Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website <a href="https://www.chichester.gov.uk">www.chichester.gov.uk</a> and may be identifiable by my name or organisation, if provided

Name (print):	RICHARD AUSTIN
Date:	06 FEBRUARY 2019