

CHICHESTER LOCAL PLAN REVIEW: CONSULTATION

RESPONSE FROM FISHBOURNE NEIGHBOURHOOD PLAN REVIEW GROUP

INTRODUCTION

Our group was established by Fishbourne Parish Council to advise the Council on how it might produce a Revised Neighbourhood Plan which would be “aspirational but deliverable” (NPPF, para 16 b).

To reach the “**aspirational**” requirement, we will examine every source of land supply with the possibility of sustainable development. We will do this through:

- A re-examination of the “red” sites rejected in the HELAA Report
- The Issue of a call for sites in case there are any landowners/developers who missed the HELAA call;
- Initial contact meeting with individual developers;
- Consideration of small sites for first five years of FNP 2020-2035;
- Consideration of Clay Lane developments (with possible need to amend when decisions are reached about Wildlife Corridor);
- Comparison of the total potential of the above sites and the allocation to Fishbourne in the submission report so that any alterations can be made.

We are aware of the requirement for revised Neighbourhood Plans to have made good progress by June 2019 in order to demonstrate that the Local Plan Review Strategy can be delivered.

Our work, however, is hindered by the unacceptable process by which the allocation of 250 additional homes for Fishbourne was made and the resultant confusion and traffic issues... **Our principal concerns centre on five aspects:**

1. The lack of any declared criteria for what otherwise seems a purely arbitrary allocation taking no account of the local situation — a flagrant flouting of the spirit of Neighbourhood Planning as envisaged by the Secretary of State, James Brokenshire: “*The number of new homes we build won’t be based on what a developer thinks they can sell but on the real needs of local communities.*”

In order to gain approval, our revised Plan would be required to meet a target allocation of new building which has been set arbitrarily at 250 (five times the allocation in our original plan) and despite repeated requests little information has been released about the criteria used to calculate the parish allocations. Such information as we have suggests that “land availability” was a factor but there seems to have been:

- no discrimination between productive top quality farmland and scrubland;
- no allowance being made for the difficulty in finding sustainable land because of Fishbourne’s regular expansion since the 1970s.

When the Fishbourne Neighbourhood Plan 2014-2029 was approved, the allocation of 50 new homes was considered appropriate because of the size of the village and

its proximity to Chichester. Four years later, this has changed to an additional 250 new homes with the only apparent reason (para 6.63) being that, as Fishbourne has been classified as a “service village”, it must need growth of population to promote its vitality and to sustain its local facilities including the school and the community centre. This may be true of some rural villages but it **is totally untrue about Fishbourne.**

Indeed, not only has CDC failed to make out a case for its arbitrary allocation of 250 homes to Fishbourne, it has failed to make out a case for **any** additional housing since the lack of vitality is not an issue.

- Development has already reached the Northern, Southern and part of the Eastern boundaries of the village,
- The primary school is full with children exclusively from its catchment area
- Families moving into Fishbourne are having to seek places in schools several miles away which not only increases travel and pollution but means the children have no school-friends in their own community.
- The Fishbourne Centre frequently works at full capacity.
- St. Peters Place, a new Church and community facility, is also already working at near capacity.
- Fishbourne has a proactive Parish Council which had a couple of Village Plans before its Neighbourhood Plan 2014-29 (which has already met its allocation)
- The much used facilities on Fishbourne Playing Field (football —junior and adult; cricket, tennis, bowls, croquet, outdoor gym equipment and a secure children’s play area) are fully used and the envy of local parishes!
- Fishbourne has a strong community spirit, the latest example of which, the Fishbourne Companions, have just celebrated their first birthday

Since the only land that might be classified as sustainable could produce only 200 homes, meeting the target allocation of 250 for Fishbourne would have to include some land from Bethwines. This would remove from the community their right to choose where building should take place. More important, too, is that this enforced breaking of the Parish Council’s policy would lead inevitably to the whole farm being used to provide 1,000 homes regardless of:

- the top quality productive farmland,
- the valued views between the Harbour and the South Downs,
- the destructive effect on wildlife and birds especially at nesting time;
- the gridlock that would result on inadequate roads;
- an unacceptable health risk caused by the rise in air pollution.

The case for a need for growth in Fishbourne in order to sustain the vitality in the village and to help to sustain the school and other services has clearly NOT been made. What proportion of the justification for the allocation of 250 was based on this false data?

2. The impact of the proposed Wildlife Corridor on land in the Eastern part of the village (Clay Lane).

In the view of professional conservationists, the designated strategic wildlife corridors proposed in the local plan do little good, are too narrow to support the wildlife and do not go far enough in their coverage. They recommend that a single much wider corridor, which would provide wildlife with the natural space in which to move about relatively undisturbed. Therefore their positioning in this plan needs to be removed, rethought and reduced to one single, much wider area – for which Bethwines Farm is ideal!

Until the last minute imposition of the Wildlife Corridor, this site was the only site where an aspirational approach might have produced 160 of the 250 allocation. Failing a relocation of the corridor, we strongly recommend that the allocation for Fishbourne should be reduced by the number of homes the parish council has been prevented from offering on the Clay Lane site as a result of the decision taken by CDC since it is not equitable for the negative impact of a District Council initiative to fall on one parish.

3. Policy on Bethwines Farm.

“National policies and regulations aim to protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals.” (Natural England, 2018).

“The Local Plan helps us to:

- ***shape where development goes;***
- ***protect the character and beauty of the area” (Chichester District Council, 2018)***

The intention to build on Bethwines Farm is not compliant with either of these statements. There needs to be more openness, clarity and consistency about the District Council’s view on Bethwines Farm. This seems to shift from regarding it as :

- not being suitable for sustainable development (current Local Plan);
- suitable for 81 homes in HELAA with the remainder being unsuitable;
- suitable for 200+ if the Wildlife Corridor is not relocated from Clay Lane;
- (almost inevitably in the next Five Year Review) suitable for the remainder of the Farm leading to a total build of 1,000 homes, thereby doubling the population of Fishbourne, causing unsustainable traffic congestion and unacceptable levels of pollution and causing irreparable damage to, rather than protecting “the character and beauty of the area”.

Against this inconsistency, we support the Parish Council’s consistent stance which is compliant with the 2018 revision of the National Planning Policy Framework, the existing Fishbourne Neighbourhood Plan - and even some of the Policies in the District Council’s own Local Plan Consultation Document, with which the proposed practices are not compliant!

We will continue to plan on the assumption that CDC will note all the implications of building on Bethwines and will come to realise that building on Bethwines would not be appropriate but would “cause unnecessary, irreparable damage and would have an adverse impact that would demonstrably outweigh the advantages.”

4. Conflict between policies and practice (infrastructure and transport)

CDC Local Plan Review Policy DM8 is a classic example. It states that any development must minimize and not create or add to problems of highway safety, congestion, air pollution or other damage. (The policy omits sound and light pollution which should be added).

It is our considered opinion that this is unachievable.

The A27 does not serve communities west of Chichester unless they use the A259 as a feeder road and there are no major employers in Fishbourne which makes travel to work a necessity.

Fishbourne is designated as a service village. The definition is that the village can provide a reasonable range of basic facilities, or have reasonable access to nearby facilities. We have no shops, no banks, no doctor, no facilities, in fact only two pubs and the Fishbourne Centre. Reasonable access – not possible due to distance and huge traffic problems. The 700 bus service that runs along the A259 is excellent, but it is nationally accepted that unless a bus stop is within 400 metres of the house, residents will not use it. The 56 bus only runs in the morning at 0815, 0943 and 1143hrs as a very limited service into the City but will again still be out of reach of potential Bethwines residents. The railway provision is a halt, not a station, and only has one train an hour in each direction, and again is out of reach of Bethwines development. Public transport is therefore not a viable option for any development on Bethwines Farm.

The ‘transport corridor’ is not effective now let alone with the 2250 houses scheduled to be built along the corridor between Chichester and Southbourne. A study of the 97 house Flavian Fields development in north Fishbourne revealed that 65% work and have to travel to employment outside of the village. This will apply equally to Chidham and Bosham. This figure also takes no account of the fact that parents will transport their children to school by car. These schools will be outside of the village due to Fishbourne and Bosham Schools being already full and the only secondary school at Southbourne being further away than Chichester schools. It has been established that Fishbourne already has the highest car dependency in Chichester District.

The CDC review team has used a national statistic of 50 cars per 100 households, but that is seriously flawed based upon local evidence that, from the Flavian Fields survey, places the figure at 200 cars per 100 households.

Specifically, the huge growth of 1000 houses in Fishbourne, Bosham and Chidham, amounts to a minimum of 1000 additional cars travelling during peak times. We would anticipate that these villages will use Chichester for employment, schools and

facilities. The 1250 houses in Southbourne will further complicate the numbers, but a considerable number will probably travel westbound,

The average length of a family car is now 4.8 metres. Allowing for about a one metre+ gap between them, 1000 cars need a stationary road space of about 6000 metres or Chidham to the Fishbourne Roundabout.

The A27 roundabout at Fishbourne is a huge blockage to any increase of traffic. There is already a peak time queue every morning of half a mile along the A259, and six miles of standing traffic on the A27. That is the current situation, but the projected figures are much worse. The roundabout will be used by the following additional traffic attempting to access the A27:

- 1600 additional houses at Whitehouse Farm via Cathedral Way
- 1000 houses at Fishbourne, Bosham and Chidham via A259
- Terminus Road traffic via Cathedral Way
- Link road to development south of A27
- Manhood Peninsula traffic diverted west of Stockbridge.

The plans for a hamburger roundabout cannot deal with this size of traffic flow, and we can only deduce that incomplete data has been fed into the computer model to establish this junction method. The eastbound queue of stop-go traffic as a result of the traffic lights will just move up to Stockbridge blocking Fishbourne: the same would be true for westbound traffic. Where some of these roundabouts have been installed they have not been a success in handling traffic better.

The projected traffic queues will further add to the destructive effects of pollution if we have miles of standing traffic in Fishbourne. There are already 4 Air Quality Management Areas (AQMA) in Chichester, the most of any area in West Sussex. Is Fishbourne to become the 5th? Simon Ballard, CDC Senior Environmental Protection Officer has publicly attributed 4.1% of Chichester's being due to PM2.5, just one pollutant of the many pollutants from vehicle emissions.

This issue with air quality pollution does not stand alone, Fishbourne residents will suffer increased noise pollution and light pollution from the proposed raised Stockbridge Link Road, its slip road will impinge by 7,000m² into The Fishbourne Meadows Conservation Area, further restricting Fishbourne residents from exiting the A259.

We would seek the opportunity to see the traffic flow data used for the junction analysis in order that we may use it for an independent study using road traffic simulation software. The timescale you have set for consultation does make a challenge very difficult and the CDC should be cognizant of and sympathetic to our inputs.

There is no doubt that the traffic presumptions made in the plan are seriously flawed, and that, if the true figures were used, the traffic plans would have to be substantially up-rated. This needs to be examined by the Planning Team.

5. Uncertainty about the A27

Peter Brett's traffic mitigation study in CDC's Local Plan has a clear dependency on Government's funding of the A27 improvements in Road Investment Strategy 2. The mitigation described in their study will mean that Chichester District Council will violate air quality levels throughout the plan period. Add to this the congestion and air pollution due to construction and the spread of pollution during works for diversionary routes.

One reason to abandon the A27 Northern upgrade was marginal and set against spend, even though the cost equates to a maximum of 2% of the £25 billion budget announced by the Chancellor in his Autumn statement. The other reason given is the conflict with National Policy, at some point will be tested for the first time, probably at Arundel. Where the requirements of the policy will have to be balanced against the good to the public (air quality, and accident reduction, support for economic growth locally and regionally).

The two reasons given by Highways England to abandon the A27 upgrade are all marginal, and set against spending on other parts of the country the financial argument does not hold water given the acknowledged congestion and accident figures of the A27.

The key to any resolution of the A259 and Fishbourne roundabout traffic problem is whether Highways England will take the Chichester District and BABA27's advice and take the A 27 flow away from Fishbourne Roundabout via a northern by pass. If the A27 is moved, this would still leave flows from the current bypass and Manhood peninsular etc. to be negotiated at Fishbourne roundabout when a hamburger roundabout would probably suffice.

SUMMARY OF MAIN RECOMMENDATIONS

Our recommendations to the CDC for the way forward to an aspirational but deliverable allocation for Fishbourne:

- (1) Reassess the allocation for Fishbourne using accurate local evidence to base the allocation on need** and taking into account the limited space available after an increase in population of 33% since 2001 on top of a doubling of the population over the previous four decades.

Correct other errors such as describing the AONB as being south of the village: in fact the AONB stretches up to the A259

Insert vital information such as a map showing the potential sites: consultees cannot comment adequately without this information and this makes the consultation process unsafe.

(2) Take into account the views of the community in the village survey where:

- maintaining “Best and most versatile agricultural land”;
- enhancing highly valued landscapes with views between Chichester Harbour AONB and the South Downs National Park;
- creating strategic gaps to retain the geographical identity of individual villages

all scored over 90% support (and are all compliant with NPPF).

(3) Given the flaws in the traffic presumptions, **provide Fishbourne Parish Council with traffic-flow data** so that an independent study can be conducted.

(4) Develop an open and consistent policy for Bethwines Farm

(5) Avoid causing irreparable harm. In many cases, it is possible to offer compensatory strategies to offset the original damage to amenities affected by new housing development. However, this is not possible where “best and most versatile agricultural land” is used for building.

(6) . Provide confirmation and proof that appropriate research has been conducted on air quality, particulate concentration and pollution expectations resulting from the increased traffic at Fishbourne Roundabout, including that expected to result from standing traffic on the approaches to Fishbourne roundabout from A259 westwards and the new proposed Donnington / Apuldram junction from the south into Fishbourne Roundabout.

Fishbourne Roundabout / A259 is already exceeding the EU air quality regulations and any ‘improvements’ planned for this roundabout will need to show substantial air quality improvements.

(7) Provide confirmation and proof that the expectations for increased sewage and waste water / run-off water from new building along A259 and in Fishbourne have been taken into account with regard to flood risk at the harbour and the approaching ditches in and around the Fishbourne area and that Southern Water have been involved regarding their capacity for these extra homes requirements.

(8) If the Wildlife Barrier is not relocated, reduce the Fishbourne allocation accordingly.

CONCLUSION

We repeat our intention to construct a revised Neighbourhood Plan that is aspirational but deliverable. However, before progress can be made we need a resolution of the problems raised in this report. – and, given the exceptionally tight timetable for the preparation of revised Neighbourhood Plans, there is an urgent need for these issues to be addressed and resolved.

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