



NO BUILDING ON BETHWINES – A RED LINE

OBJECTION TO THE INCLUSION OF 1,000+ HOUSES (OR ANY APPORTION OR INCREASE THEREOF) ON BETHWINES FARM, BLACKBOY LANE, FISHBOURNE IN THE FORTHCOMING REVISION OF THE CHICHESTER LOCAL PLAN.

The publications referred to below as evidence to support our objection are the revised edition of the National Planning Policy Framework (NPPF), the Consultation issue of the Revised Chichester Local Plan and the Fishbourne Neighbourhood Plan 2014-2029 (FNP).

Further evidence has come from the Village meeting attended by over 100 residents and from the Analysis of the Village Survey 2018.

Fishbourne Parish Council **OBJECTS** to the offer by Icení (on behalf of Fishbourne Developments Ltd), outlined in their letter to Planning Policy dated 3rd August 2017. The Parish Council recognises the need for more housing and, indeed, in the three years (2011-2013) before the publication of FNP, had built 60 houses, making it the **third largest contributor to new housing out of the 68 town and parish councils which form part of Chichester District Council. This is on top of a 19% increase in new housing between the 2001 Census and the 2011 Census.**

However, the need for new houses does not mean developers can build anywhere they like and the National Planning Policy Framework (NPPF) makes it clear that development should be “sustainable” and should be in accord with Neighbourhood and Local plans

The Fishbourne Neighbourhood Plan (2014-2029) includes sustainable sites on which the allocation of new housing set by the District Council can be achieved and indeed these houses are already built and occupied (2017).

The Bethwines site was one of a small number of “available” sites **rejected** by the Plan’s Steering Group, by an Open Meeting and by a subsequent meeting of the Parish Council, since:

- it was outside the Settlement Policy Area;
- it would cause irreparable damage;
- it was not sustainable;

and as a result failed to meet many of the requirements of the NPPF.

In brief, the site is not considered appropriate for development because:

- 1 The proposal is the antithesis of the NPPF requirement that planning should be “**genuinely plan ledand platform for local people to shape their surroundings**” since there is universal opposition to it – and the fact that a developer offers a site does not mean it is therefore sustainable.



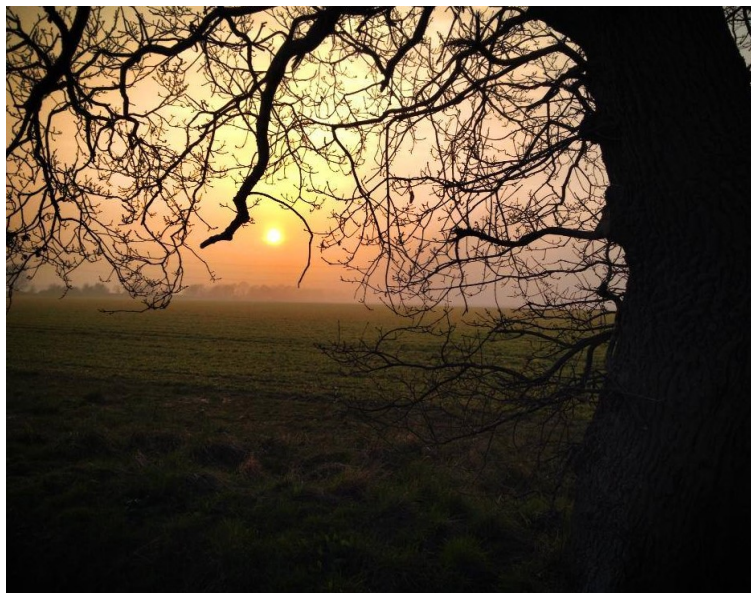
- 2 Misuse of “**Best and Most Variable Agricultural Land**”. Where agricultural land has to be used, the NPPF requires planning authorities to use areas of poorer quality land in preference to those of a higher quality. Moreover, the coastal plain is not only rich agricultural land but also has increased light levels especially important for salad crops.
- 3 Lower grade, non-agricultural land should be available elsewhere in the East-West corridor. Building on this site would cause irreparable damage.



- 4 Should only a small part of the farm be offered as a “first slice”, **the reduced area of the farm** would be more difficult to farm cost-effectively and the uncertainty about the size and timing of subsequent “salami slices” would hinder proper long-term management. This is

not in compliance with the NPPF or DEFRA's circular in 2013 urging farmers "to produce more food, not just for economic growth but also to feed the growing world population," estimated to be 9 billion by 2050 (an increase of 35% on the 2010 population). By contrast, a recent survey by NFU showed a 10% reduction in the proportion of food grown in the UK. In addition, Fishbourne is classified by CDC as one of the "service villages", which are suitable for "small scale housing development" which would make the full 1,000 house offer inappropriate.

4. After 50 years of development without appropriate infrastructure, the roads are already blocked by **excessive traffic**, much of which is the cumulative result of building elsewhere along the A259 with drivers using the narrow roads and country lanes as a means of avoiding the dangerous and congested Fishbourne Roundabout. This situation will be exacerbated by the additional traffic from the White House Farm development which will impact directly on the local road network as well as the A27. Where there is queuing, the air quality is poor and being stuck in traffic jams is "not good for the environment or for people's health and it's certainly not good for the health of the West Sussex economy" (Louise Goldsmith, Leader WSCC).
5. **Accessibility to the site for building vehicles**, would be hazardous, especially given the narrowness of Blackboy Lane and Bethwines Close, the lack of pavements and the ditches on either side of the road and the volume of traffic that is queuing or speeding (depending on the time of day) .
6. The proposal would **ruin for ever a highly valued landscape** with unique views across the coastal plain enjoyed by residents, walkers and visitors – whereas the NPPF (2018) says planning should "contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes." Development should be designed to protect long-distance views to and from Chichester Harbour, the South Downs National Park, Stow Clump, SSSI Kingley Vale and Bow Hill. Chichester District Council itself acknowledges that building on Bethwines would conflict with the NPPF guidance, since in the HELAA list of rejected offers it rejects all but the strip nearest to Blackboy Lane because of the "impact on the landscape setting and long distance views."



7. Moreover, the farmland has a **strategic value as an important gap** needed to prevent coalescence with Bosham. The proximity of the site to the boundary with Bosham Parish would violate the separate identity of Fishbourne as a village (a need which recorded 96% support in the Village Survey) and would conflict with the recommendation in Para 80 of the National Planning Policy Framework (NPPF) that planning should prevent neighbouring towns and villages “from merging into one another”.
8. **Biodiversity** would be threatened as the farmland, the old buildings, the ditches and the wildlife margin around the farm have great biodiversity significance.
9. Chichester Harbour is an **AONB** and in opposing a previous application (2008) the Harbour Conservancy considered that eroding the separate identity of Fishbourne as a settlement area “could have serious consequences for the distinctive identity and rural setting of the AONB.” The NPPF states of AONBs that “great weight should be given to considering their landscape and scenic beauty”.
10. Chichester Harbour Conservancy have expressed their concern that future development allocations “on the edge of Chichester and within settlements close to the AONB boundary are likely to affect the character of the AONB directly or indirectly through **increased disturbance, noise and light pollution, visual intrusion and loss of views, water quality issues and a loss of tranquillity and sense of wilderness**. Particular concerns are raised about the impacts of **increased recreational disturbance** on the designated sites within the Harbour”.
11. With the extremely high water table, it is not surprising that Fishbourne has a history of **flooding**. This has increased with each new development as the new building has stretched further and further towards the village’s northern boundary. This has not been accompanied by the necessary increase in infrastructure and as a result surface water flooding is now a common occurrence where once it was a rarity. The problem cannot be “engineered away” as previous developers have promised because there just isn’t the capacity downstream to take any more water. The NPPF has a clear requirement on this: “Developers must make sure that, in safeguarding their own development, they do this without increasing the flood risk elsewhere.” (see *Flooding in Fishbourne* (attached)).
12. South of the A259, **coastal change** is increasing flooding from sea water and even relatively small increases in sea level (as projected) will have an impact on Fishbourne. Higher tides coinciding with strong winds will put parts of the A259 at risk – and at even greater risk if the incoming tide is met by an increase in surface water flowing from the building development towards the sea.

The Parish Council urges the officers and members of the Planning Authority to REJECT this offer of land in its revision of the Local Plan since it is not sustainable, causes unnecessary irreparable damage and would have an adverse impact that would significantly and demonstrably outweigh the benefits.

Fishbourne Parish Council

18 September 2018.

Note: In the Village Survey 2018, Bethwines was top of the list of sites which should be protected from development. All the above concerns were cited as reasons for this.