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Dear Sirs,

Representations on the Chichester Local Plan

REP1: OBJECTION TO CRITERION 5 OF AL7 - INCONSISTENT POLICY WORDING

Bosham Parish Council is of the view that there is an inconsistency between the policies and their supporting text concerning the treatment of the landscape surrounding Fishbourne and that surrounding Bosham, particularly that part of the village north of the A259. Consequently the policy wording is not effective and will not deliver the most appropriate strategy for the site.

Policy AL10 allocates land at Chidham and Hambrook for 500 dwellings. Policy AL9 allocates land at Fishbourne for 250 dwellings. Criterion 5 of each of these policies considers issues of landscape impact when it states:

“Detailed consideration of the impact of development on the surrounding landscape, including the South Downs National Park and Chichester Harbour AONB and their settings. Development should be designed to protect long-distance views to the South Downs National Park;

It is logical to include the same criterion 5 in each of these policies since both settlements are close to the South Downs National Park and the AONB. Bosham happens to occupy a location between Fishbourne and Chidham/Hambrook settlements. Bosham is similarly set between the South Downs National Park and the AONB. It is therefore somewhat surprising that criterion 5 of Policy AL7 relating to Bosham states:

“Provision of landscaping and screening to minimise the impact of development on Bosham, and the setting of the Chichester Harbour AONB and South Downs National Park, including views to and from the wider and surrounding area;”

The Parish Council’s concern is that the wording of this criterion implies less stringent assessment and appraisal of the landscape setting related to the AL7 allocation than is the case with Policy AL9 and AL10. The criterion merely states “provision of.” This is despite Bosham having an arguably more sensitive relationship to the Chichester Harbour area. The consequence of this, is that there is no policy requirement for a “detailed consideration of the impact of development on the surrounding landscape.” This means that landscape proposals could be devised which merely introduce buffer

planting without actually assessing what depth of planting should take place and the type of plants which are suitable. The criterion 5 wording of AL7 also does not include any requirement for proposals to be “designed to protect long-distance views to the South Downs National Park.” This implies that the landscaping and design associated with the Highgrove site (AL7) will be judged against a lower threshold than with the AL9 and AL10 housing allocations. The policy is therefore not effective and neither would it deliver an appropriate design strategy for the site

It is proposed that to ensure that the plan is consistent, sound and recognises the same sensitivity as a result of the proximity of the Chichester Harbour AONB, criterion 5 be amended to state:

“Detailed consideration of the impact of development on the surrounding landscape, including the South Downs National Park and Chichester Harbour AONB and their settings. Development should be designed to protect long-distance views to the South Downs National Park and Chichester Harbour. Provision of landscaping and screening to minimise the impact of development on Bosham, and the setting of the Chichester Harbour AONB and South Downs National Park, including views to and from the wider and surrounding area shall form an integral part of any application;

REP2: OBJECTION TO PARAGRAPH 6.56

This paragraph is preamble to Policy AL7 and sets out the specific issues that need to be taken into consideration when planning the development of the allocated site. In paragraph 6.65 the preamble states that:

“Protecting the separate distinct identity of Fishbourne in relationship to surrounding settlements, including Chichester City;”

This is logical since the development of 250 homes on land around this settlement could result in a design which is out of keeping with the wider character of the area. In addition, Fishbourne is close to Bosham and consideration of design needs to recognise and plan for that proximity.

In the case of Bosham, no issue relating to ‘distinct identity’ is raised in the supporting text. This is considered to be unsound because the settlement of Bosham has a particular distinct identity and the Highgrove allocation is on the eastern side of the village and would draw development closer to Fishbourne. It cannot be the case that Fishbourne has supporting text which seeks to protect its special identity but Bosham, with a large allocation does not. This would not deliver an effective plan due to the inconsistency and neither would it deliver an appropriate growth strategy for Bosham.

The settlement or village of Bosham is comprised of two built up areas. A neighbourhood called Broadbridge to the north of the A259 and an area located around the historic harbour. Whilst physically separate, they each form part of ‘the village’ and are interrelated in terms of activity and service offer. The allocation of 250 new homes at Highgrove is a significant number when compared to the existing number of dwellings in Bosham. Consequently, it is important that the identity of Bosham is carefully considered when designs are drawn up. The NPPF continues to advise that design should be of a high quality and certainly this is an important issue when setting the policy context for AL7.

It is recommended that a new bullet point be added to paragraph 5.56 which states:

“ Protecting the separate distinct identity of Bosham in relationship to surrounding settlements, including Fishbourne;”

REP3: OBJECTION TO CRITERION 3 OF AL7

Policies AL9 and AL10 both include criterion 3 which state:

“Provision of suitable means of access to the site(s) and securing necessary off-site improvements (including highways) to promote sustainable transport options;”

However, criterion 3 of AL7 states:

“Provision of a satisfactory means of access from the A259;”

Bosham is a village with two centres severed by the A259. For reasons of social cohesion and to ensure that the new development has satisfactory pedestrian links with the facilities to the south of the A259, including the small employment areas and community facilities, it is essential that some form of pedestrian crossing and other pedestrian infrastructure is installed to support the new development. At the moment the strategy being promoted by the Council cuts against social cohesion and is clearly an inappropriate strategy compared with the alternative which is to require a crossing. Criterion 3 should therefore be more appropriately worded to allow these issues to be delivered. It is recommended that criterion 3 should be redrafted to state:

Provision of primary access from the A259, consideration of an emergency access and pedestrian access to the western side of the site and securing necessary off-site improvements (including highways) to promote sustainable transport options. This would include an appropriately located pedestrian crossing and a footpath link;

REP4: OBJECTION TO POLICY AL7

Bosham Parish Council is concerned that the policy fails to give appropriate guidance on matters of environmental importance and this is contrary to the NPPF. In both policy AL9 and AL10, a criterion states:

“Demonstration that development would not have an adverse impact on the nature conservation interest of identified sites and habitats;”

However, in the case of the Highgrove allocation AL7 environmental assessments have already taken place in connection with application 17/03148/FUL and the site allocations document which allocates a smaller part of Highgrove Farm for 50 dwelling units. This research has identified a population of slow worms on the site. It is also the case that Brent Geese, a species protected under Law, have used the open fields for landing. Given that there is ecology of acknowledged importance, it is considered that to be compliant with NPPF a criterion should be added which protects the habitat and ecology of the area. This would comply with NPPF and be consistent with the way other sites have been treated. The new criterion should state:

“Demonstration that development would not have an adverse impact on the nature conservation interest of identified sites and habitats;”

REP5: OBJECTION TO POLICY AL7

Policy AL9 and AL10 include a criterion which states:

“Provide mitigation to ensure the protection of the SPA, SAC and Ramsar site at Chichester Harbour as a result of water quality issues relating to runoff into a designated site, and loss of functionally linked supporting habitat;”

Policy AL7 does not include this criterion yet the allocation is as close to the protected Harbour and water courses that flow into it as the sites promoted at AL9 and AL10. In the case of Highgrove Farm there is a drainage ditch running along the southwest corner which would need effective management to ensure hydro carbon pollutants do not enter the catchment. It is therefore inconsistent and contrary to NPPF that AL7 does not have the same criterion. A new criterion should be included which states:

“Provide mitigation to ensure the protection of the SPA, SAC and Ramsar site at Chichester Harbour as a result of water quality issues relating to runoff into a designated site, and loss of functionally linked supporting habitat;”

REP6: OBJECTION TO POLICY AL7

A consultation exercise carried out by Bosham Parish Council in December 2018 revealed widespread local concern, and photographic evidence, concerning the ability of the site to drain safely and effectively. The drainage ditch to the southwest corner regularly floods as a result of it being of insufficient capacity and poor management. There is no robust or credible evidence to suggest that this issue should not be specifically identified as a criterion in Policy AL7.

The approved development of 50 houses at Highgrove (17/03148/FUL) has a significant area within the development site which is required for storm surface water balancing ponds/SuDS /underground storm water crates within the open space area. These areas occupied some 0.5ha of the 2.2ha allocated. For a 250 house scheme the requirements would be significantly higher. Any area required for drainage should sit outside of that required for open space, ecological mitigation and other community infrastructure.

It is therefore considered that some on site Suds or attenuation pond will be necessary as part of the scheme. The area necessary would need to be established through studies and would need to be independent of the overall open space requirement of the site. AL7 should link to Policy DM18 and the requirements contained in that policy.

Criterion 11 of AL9 also makes reference to securing sufficient capacity within the relevant Waste Water Treatment Works. Paragraph 5.70 states that during the life of the Plan “measures will need to be put in place at each WwTW... in order to tackle current and future water quality issues to support future housing growth.” Clearly some form of criterion is essential to ensure that commencement of the development cannot occur until such works are completed. The recently completed Hospice to the south of the draft allocation within the AONB required additional foul sewer capacity upgrades in order to be occupied. In view of this evidence and the approach taken with Policy AL9, Policy AL7 should include a criterion requiring offsite infrastructure improvements to address foul sewage.

REP7: OBJECTION TO POLICY DM18 FLOOD RISK AND WATER MANAGEMENT

In view of Bosham Parish Council’s representations relating to surface water flooding at AL7, it is considered that this policy should include an additional criterion making it clear that development proposals will need to outline a robust strategy for addressing surface water drainage and flood risk.

REP 8 – OBJECTION TO POLICY S31 AND APPENDIX E RELATING TO WASTEWATER MONITORING

As a result of Bosham Parish Council’s representations to AL7, it is considered that S31 should be amended to include an additional criterion which makes it clear that planning permission will only be granted where enhancements to necessary foul water infrastructure occur prior to the commencement of development. On site schemes which discharge into nearby water courses should not be deemed acceptable, particularly those within proximity of the Chichester Harbour AONB. Appendix E should include a requirement that the District Council discusses Southern Water’s current 5 year investment programme and only allow commencement of development when suitable infrastructure enhancements have taken place.

REP9 - OBJECTION TO POLICY DM34 - OPEN SPACE

The revised Open Space, Sport and Recreation Study including Indoor Sports Facilities and Playing Pitch 2018 has reduced the requirement for open space by almost a third across the whole district. There is no evidence and justification for this reduction. The District wide reduction in open space requirements may penalise those Parishes where an existing shortfall exists. It is not an appropriate strategy compared with the previous standards for open space. It is not based on any credible evidence to justify a change.

The information in Table 14 of the Chichester open Space Study (Main Report) September 2018 shows that Bosham has the third highest shortfall in the parishes in the District of Parks and Recreation Grounds combined. The extract of the table below shows that in every category Bosham has a significant deficiency.

The supply of open space by sub area is covered in part 2 of this report.

Table 14 Supply by Parish (hectares) against the Chichester Local Plan Area quantity standards

Parish	Allotments	Amenity Green Space	Parks and Recreation Grounds (combined)	Play (Child)	Play (Youth)
Appledram	-0.05	-0.1	-0.2	-0.01	-0.01
Birdham	-0.44	-0.89	0.74	-0.01	-0.07
Bosham	-0.87	-0.88	-2.45	-0.05	-0.14
Boxgrove	-0.29	-0.56	0.8	-0.01	-0.04
Chichester	-1.88	1.07	-1.35	-0.75	-1.15
Chidham and Hambrook	-0.41	-0.81	-1.63	0.01	-0.07
Donnington	-0.62	1.79	-2.08	0	-0.08
Earnley	-0.14	-0.28	-0.55	-0.02	-0.02
Eartham	-0.03	-0.07	-0.13	-0.01	-0.01
East Wittering	-1.4	-1.51	0.06	-0.12	-0.14
Ebernoe	-0.06	-0.13	0.56	-0.01	-0.01
Fishbourne	-0.7	-1.24	3.16	-0.02	-0.07
Funtington	-0.46	0.56	-1.86	-0.06	-0.08
Hunston	0.29	-0.75	0.32	0.03	0.04
Kirdford	-0.32	0.54	1.21	-0.02	-0.04
Lavant	0.48	2.55	-1.99	0.1	-0.05
Linchmere	-0.51	0.78	-0.61	0.05	-0.09
Loxwood	-0.44	-0.33	2.14	-0.03	-0.07
North Mundham	-0.36	-0.72	0.85	0.02	-0.02
Northchapel	0.24	1.23	-0.96	0.03	-0.04
Oving	-0.32	-0.63	-0.15	-0.03	0.02
Petworth	0.8	-0.02	0.64	-0.01	-0.13
Plaistow	-0.57	-0.87	0.4	-0.01	-0.09
Selsey	-3	-2.9	-7.45	-0.28	-0.27
Sidlesham	-0.35	-0.7	1.15	0.03	-0.06

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It is considered that the new standards should not form the basis for the open space requirements at Highgrove Farm and that the previous standards should be retained to address the unique circumstances of Bosham.

REP 10 – OBJECTION TO LANDSCAPE CAPACITY POLICY DM28 NATURAL ENVIRONMENT AND DM19 CHAONB

The draft Landscape Capacity Study (published by Terra Firma, November 2018) concludes that The AL7 draft site allocation has only medium/ low capacity for landscape change and states “Great care would need to be taken to avoid any landscape or visual harm ensuring the separate identities of the settlements are protected and considering valued views”.

At the present time the Landscape Capacity Study is in draft form only and its conclusions are currently based on a summer assessment. It would be the case that the same assessment during the winter months would yield a greater degree of landscape sensitivity. The evidence base, as currently published, is not robust and the AL7 policy wording “development of a minimum of 250 dwellings...” is not based on robust and credible evidence. The landscape sensitivity suggests that

the 250 dwelling number should be a maximum cap and that the policy should be re-worded to say “up to 250 dwellings...”

REP 11 – OBJECTION TO AL7 - DENSITY AND NUMER

Bosham Parish Council has concerns regarding the policy wording which sets a minimum threshold for the number of dwellings “minimum of 250 dwellings”.

Concern about the numbers of dwelling and density proposed taking account of the issues raised namely the need for onsite SUDS and drainage, a 2 form entry school, suitable landscaping and mitigation, and suitable ecological mitigation. Any development must also have regard to the character of the area and a density which reflects that of the surrounding area. There is no credible evidence to suggest that more than 250 dwellings can be achieved when all these considerations are taken into account. It is noted that Draft Policy DM3 explains at criterion ‘b’ that locations adjacent to sensitive locations may justify lower densities.

The policy should be reworded to ensure the 250 dwelling amount is an upper threshold.

OTHER

We support the creation of an integrated and sustainable transport plan for the District, or at the very least for the area west of Chichester. This plan should draw upon the ongoing work of the ChEmRoute group’s investigations and proposals for the National Cycle Route 2 (NCN2) and be co-ordinated with WSCC with the goal of introducing high quality and separated cycle links between the villages along the A259 and Chichester. The route or routes may include a fast but safe link along the A259 aimed primarily at cyclists including commuters as well as a slower, more meandering and leisurely route north of the A259 (and perhaps the railway). To make these cycle routes sustainable they will need connections and feeder routes from new and existing developments. In developing a more ambitious and safer scheme for cyclists care must also be taken to ensure that pedestrian routes are protected too. The vision must be to ensure that both cycle and pedestrian traffic is encouraged and supported and not brought into competition with each other.

Yours sincerely

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