

Mr Alan Chapman



6-Feb-2019

Planning Department
Chichester District Council
East Pallant House
Chichester
West Sussex PO19 1TY

Dear Sir/Madam

Ref: Letter of objection to the Local Plan Review Policy AL7 for Bosham

I have no doubt that Bosham has to take its fair share of the local housing allocation imposed on it by central government. Given that admission, I would like to point out that I do not object to the housing allocation or, for that matter, Highgrove alleviating a proportion of that allocation with considered mitigation. I have not referred to the information contained in the prologue to Policy AL7 as this only guides the policy and does not form part of it. For the reasons given below, I have to object to the LPA's Policy AL7 in its entirety in the hope that a more considered and diverse approach will be adopted.

Policy AL7 commences with a statement that there will be a two-form entry primary school. Firstly, with no other details provided, what facilities will be provided in the way of playgrounds and protected playing fields. There is no indication of what will be provided and smacks of an idea about a plan, not something that has been thought through. Secondly, this places the school on the fringe of the village. In the 2018 NPPF paragraph 110 in the section 'Considering development proposals states that, *"in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;"* Placing the school on the fringe of the village will only encourage the use of cars. The school should remain at the centre of the village.

Paragraphs 1 to 4 & 10 in Policy AL7 would apply to any reasonably designed development anywhere and reads more as a filler, bulking out the policy, rather than part of an innovative approach addressing the needs of the community as a whole. And what does 'masterplanned' and 'gateway feature' even mean? The entire policy, brief as it is, generates far more questions than answers.

Prior to the publication of Policy AL7 the LPA had looked at all of Bosham's proposed housing sites and apart from one, Highgrove Farm, all have been rejected. A good number of these fall within the AONB and as such, CDC have deleted those in line with the Independent Examiner's deletion of Policy 2 of BPC's Neighbourhood Plan. The reason for the deletion, with the exception of Swanfield, was

overwhelmingly the lack of evidence to mitigate any adverse impact on views across the AONB. With the required evidence provided, a number of those sites could still be viable. Of the remainder, those to the north of the railway line seem to have been dismissed offhandedly for what can only be described as spurious reasons even though the Highgrove Farm sites, HBO0002a & HBO0002b, scored more poorly in the 2014 SHLAA than land immediately north of the railway line.

With regard to paragraphs 5, 6 & 8 of Policy AL7, in paragraph 53 of the Independent Examiners report on Bosham Neighbourhood Plan the examiner clearly states that, quote: *"The AONB has the highest status of protection in relation to landscape and scenic beauty."* The examiner also determines in paragraph 47 that, quote: *"-----There is no strategic requirement for 150 dwellings in Bosham Parish (which I will come to later). To satisfy the requirement in the NPPF for there to be great weight given to conserving landscape and scenic beauty in an AONB, the comparison should be between the impact of an indicative number of 50 dwellings inside or outside the AONB, on the landscape and scenic beauty of the AONB."* The examiner stated that there was no justification for BPC to reject the Highgrove site but this was stated while the comparison was for an indicative number for Bosham of 50 houses, not the minimum of 250 now being quoted. And it should be noted that in the 2014 SHLAA the LPA were quoting 485 houses for the east west corridor. This would also suggest that the LPA were never considering any other sites.

Would development on the Highgrove Farm site impact adversely on the AONB? There is absolutely no doubt that placing the numbers of houses onto the Highgrove site that the LPA intends will not only destroy the outlook from the south of the AONB across the downs but also for those approaching from the east. Developing any site adjacent to the AONB will have an adverse impact on the views across the AONB. What type of landscaping and screening are the LPA thinking of using to screen a minimum of 250 houses and a school. I believe that it would require a lot of trees to screen 250+ houses and a school, more land required than any developer would likely want to give up. Of course any landscaping would, in itself, change the aspect across the AONB.

The LPA would seem to have not applied the same tests to their preferred sites as to those the examiner rejected. Paragraph 43 of the examiner's report states that, quote: *"Where development is likely to have an adverse impact, there may be a requirement to demonstrate which alternatives have been considered and that developing the proposed site outweighs the landscape value of the area."* Have the LPA actively sought any alternative sites to alleviate the impact on the AONB? In terms of addressing constraints identified in the 2014 SHLAA, the 2018 'HELAA Detailed Site Assessment Forms' are anything but detailed and address nothing. There is no indication in the 2018 HELAA that the LPA have produced any evidence to indicate that they have taken on the comments from the examiner or addressed the constraints highlighted in the 2014 SHLAA but have rejected every other alternative in promoting their 'one site' preferred approach.

One worrying issue directly linked to the Highgrove site is that the boundaries of sites are based on the information available at the time. The HELAA does not limit an extension or contraction of these boundaries for the purpose of a planning application or development plan allocation. The Ham Farm site, HBO0009 abuts the Highgrove farm site. If the Highgrove sites are fully developed there would be no constraints, hence, no assurances that the Ham Farm site would not then become available for development. It would no longer be 'separated' from the settlement boundary. Any development should seek to keep the Highgrove Farm and Ham Farm sites separated. Planting buffer landscaping to the east would not change this.

Paragraph 67 of the NPPF states that, quote: *"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."* The LPA should not be throwing up barriers. There is a mix of sites available!

The available land to the north of the railway line, HBO0003 & HBO0022, has been rejected for being 'severed' from the main settlement by the railway line. This was not the case until the settlement boundary was moved to the south of the railway line between 2012 and 2014 prior to the publication of the 2014 SHLAA. For planning purposes, up until it was deliberately severed it was a viable site for planning purposes and still is logically. The majority of the villages along the Chichester to Emsworth road have settlements both sides of the railway, Fishbourne, Nutbourne and Southbourne. There are villages, towns and cities across the country straddling railway lines. Even Chichester is spread out both sides of the line with crossings throughout the city. Innumerable people cross the lines every day. As far as I am aware it has no adverse effects on the day to day life of those settlements. What makes Bosham different?

Development north of the railway line would take a considerable amount of pressure off of the east west corridor where, if the LPA has its way, one massive housing estate, will sit on 'Grade A' agricultural land as a carbuncle on the north side of the AONB. The land to the north of the railway line does not affect the AONB in any way and also sits much closer to local amenities. As stated before, the Highgrove Farm site sits on Grade 'A' agricultural land whereas the HBO0003 & HBO0022 sites to the north sit on lower grade land. The Highgrove Farm site also has a high water table whereas the land north of the railway line drains into the Bosham Stream creating a much lower water table than the surrounding land.

Paragraph 7 of Policy AL7 seems odd in that the water course referred to rises on the Highgrove sight and seems to terminate there also. Will the retention of this water course be part of the mitigation argument in regards to surface water flooding? If so, it achieves nothing.

Paragraph 9 of Policy AL7 is superfluous for both Highgrove sites and the sites north of the railway line.

The note dealing with sewer capacity gives no assurances. The LPA will need to provide evidence of an independent engineer's report detailing the capacity of the system and its ability, or lack of, to be able to accommodate the additional load. No matter where the allocated houses are placed, ensuring that the sewers can cope is an imperative.

Paragraphs 3 and 57 of the Independent Examiners report say that local people would still get to be involved where housing would be allocated in the forthcoming CDC plan. No consideration has been given to those recommendations. The residents of Bosham held a referendum on a modified plan addressing those recommendations and that voice has been totally ignored. Being asked to comment on a single site, Highgrove Farm, is totally different from a community consultation on various options which the Independent Examiner implied in her report. This has the potential to make the referendum held null and void.

Bosham is a diverse village and as such any housing proposals should try to emulate that diversity. Not the one huge estate policy that councils have a tendency to lean towards but smaller sites with different characters. The LPA has the responsibility to look at land allocations strategically but it also

has a responsibility to do whatever it can to alleviate the impact on the AONB and the village as much as possible. It also needs to take notice of the people whose lives their decisions will affect. At this point in time this appears not to have been done. Without the LPA giving more serious thought to appropriate mitigation regarding the AONB and no indication of a more diverse approach to the village scene, I have no alternative but to object to Policy AL7 of the Local Plan Review. Placing all of Bosham's present housing allocation onto the Highgrove Farm site should not be considered.

Yours faithfully



Mr A.F. Chapman