

FISHBOURNE PARISH COUNCIL

FB/19/03141/FUL

Land at Bethwines Farm and South of Ivy Lodge, Blackboy Lane, Fishbourne

OBJECTION

Further to its earlier submission and following consultation with the community at a Parish Council meeting, a meeting of the Fishbourne Neighbourhood Plan Review Group, an Open Meeting attended by some 100 residents and having read the 150+ objections on the Planning website, Fishbourne Parish Council wishes to confirm its OBJECTION to the above planning application.

The Council wishes to place on record its sustained support for planning, having trebled the housing in the village over 50 years and having developed up to three of its four borders. It objects to this Entry Level Exception Site (ELES) application because it is in the wrong location, offering the wrong type of housing and doing so at the wrong time.

More specifically, Fishbourne Parish Council urges the officers to REJECT the application on the following grounds:

1. The application fails to meet the requirements of the Entry Level Exception Sites scheme that all the homes should be affordable for “First Time Buyers” (or those looking to rent their first home) since 40% of the homes are 3 bedroomed (average Chichester price: £411,285) or 4 bedroomed (average Chichester price: £645,521).
2. The application fails to illustrate how it meets a key consideration of ELES proposals that they should meet a need “that is not already being met within the authority’s area”. The Chichester Housing and Economic Development Needs Assessment 2018 (HEDNA) shows that the needs for first time buyers and renters will continue to be met through normal means of supply.
3. The application fails to make out a reason for building on productive farmland. The revised Fishbourne Neighbourhood Plan will include at least 30% affordable homes and these will be located on sites that are sustainable rather than on productive farmland.
4. The proposed buildings would result in the urbanisation of a rural area and would not be “proportionate in size to the existing settlement” (as required in para 71 (b) of the National Planning Policy Framework (2018) since many of the existing dwellings adjacent to the site are bungalows.
5. There is much public concern that this application could be the first part of a piecemeal development which could in time overlap the parish boundary with Bosham regardless of the ecological and environmental damage this would cause. A more strategic approach would also include the impact of changing weather patterns along the A259 rather than relying on desktop surveys.
6. Any lighting in or adjacent to Blackboy Lane would be contrary to the Harbour Conservancy’s Dark Skies Policy.

7. The community has strongly opposed any building on Bethwines Farm and the large number of objections on the CDC website indicates that this view is still very firmly held. Fishbourne Parish Council has opposed previous applications to build on Bethwines Farm, arguing that such development is not sustainable and would cause unnecessary irreparable damage, fail to meet many requirements of the NPPF, fail to comply with the need to contribute to and enhance the landscape and scenic beauty of the site, ignore the strategic value of the farmland, and thus overall would have an adverse impact that would significantly and demonstrably outweigh the benefits.
8. In their report *The Priority Views Study*, the Harbour Conservancy warn of the risk to “iconic views” and refer to the Fishbourne Channel to the south of the proposed site as “one of the most sensitive parts of the Harbour”.
9. Increasing public awareness of the urgency of tackling climate change before it is too late is causing CDC to reconsider allocating so much housing to the East-West corridor and it would seem perverse in these circumstances to add 35 houses. The A259 has long been prone to flooding because of the high water level which leaves nowhere for surface water to go. Desk top surveys are based on historical data but this is now out of date because of the change in weather patterns. Extreme weather conditions are becoming more frequent and, even without any further development on land north of the A259, the combination of south-westerly gales and intense rainfall will soon lead to flooding on the A259. Any new building would only exacerbate this danger.
10. The proposals for a private sewerage system have alarmed several residents in the area - with doubts about its safety, its location and noise and air pollution. The joint Position Statement between the Environment Agency and Southern Water on managing new housing development in the Apuldram (Chichester) Wastewater Treatment Works Catchment was endorsed by Chichester District Council Planning Committee in December 2019. It advises that, for major development (10 dwellings) within Settlement Boundaries of Chichester, Fishbourne and Stockbridge applicants will need to demonstrate no net increase in flows to the sewer network of the Apuldram WwTW. Where development cannot demonstrate this the Chichester Water Quality Group will support the Council in refusing planning permission or suggesting appropriate planning conditions to address the environmental concerns.
11. The Parish Council notes and wishes to endorse the objection from the **Environment Agency** on the grounds that inadequate justification has been provided for the use of a non-mains system. “**Lack of capacity or plans to improve capacity in the sewer is not a valid reason for a development to install a private sewerage system ...** We recommend that the application should be refused on this basis.”
12. The Parish Council endorses the warning from **Portsmouth Water** concerning the **potential risk** to groundwater quality because the site is located in Source Protection Zone 1c: “Subterranean activities such as deep drainage solutions and/or piling may pose a risk to groundwater quality and the local public drinking water supply source.”
13. The Parish Council welcomes the clarification by the **Lead Local Flood Authority** of how Fishbourne is classified as “Low Risk”. The category is, as they explain, based on modelled data and therefore might not reflect local experience. In fact, the Parish Council has photographic evidence of both historic and recent flooding and this is

readily available. The evidence will be forwarded to the LLFA and 3 photographs are attached (2 historical and 1 taken in 2020).

14. The road infrastructure is already operating at capacity. Blackboy Lane and Bethwines Close would not be suitable for large construction traffic or for the traffic resulting from the new homes. Neither Blackboy Lane nor Clay Lane is wide enough for two large vehicles or tractors to pass each other and the lack of much pavement serves only to heighten the danger. The Blackboy Lane and Salthill Road junctions with the A259 and the Salthill Road/Clay Lane crossroads are high risk areas because of the rat run traffic to avoid Fishbourne Roundabout and there has recently been a fatal accident at one of these junctions.

Fishbourne Parish Council
12 February 2020