



Plaistow and Ifold Parish Council Representation

6th June 2023

Extract from submission- Section 7

Proposal 1: 22/03114/FULEIA

Crouchlands Farm proposed erection of 108 dwellings (Use Class C3), and associated access and street network, footpaths, open spaces, plant, landscaping, and site infrastructure. | Crouchlands Farm Rickmans Lane Plaistow Billingshurst West Sussex RH14 0LE

Proposal 2: 22/03131/OUTEIA

Crouchlands Farm proposed outline planning application (with all matters reserved except access) for the erection of up to 492 dwellings (Use Class C3), education provision including primary school (Use Class F1) and associated access, footpaths, open spaces, landscaping and site infrastructure. | Crouchlands Farm Rickmans Lane Plaistow Billingshurst West Sussex RH14 0LE

Section 7: Travel and Transport Issues

7.1 Paragraph 105 of the NPPF states: -

"significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".

[own emphasis]

7.2 The NPPF also recognises that: -

"opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making".

7.3 The parish of Plaistow and Ifold is remote and isolated, set apart from the full range of services and facilities required by its existing residents on a regular basis. Public transport links are poor and consequently residents are reliant upon private cars, regardless of their willingness to adopt more sustainable options. The Applicant acknowledges that: -

"access to day-to-day services and facilities for local residents is somewhat hindered by the rural location, and subsequent level of transport infrastructure provision"¹

7.4 The nearest railway station to access London and other more local centres of employment is over 11km away at Billingshurst. Chichester is 36km away from the application site – a 43-minute car journey, or a 41-minute train journey, but the SA of the eCLP correctly notes that: -

"the cathedral city of Chichester [...] is the main centre for higher order services, facilities and retail, as well as employment"² and

"the majority of existing employment and business space is focused around Chichester City and the A27 corridor..."³

Public Transport

¹ 22/03131/OUTEIA | TRANSPORT ASSESSMENT-5103532, 4.2 Site Location, 2nd paragraph

² Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.3, pg., 2

³ Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.8, pg., 3

7.5 Existing bus services which might be accessible to some residents of RGV are extremely limited and unsuitable for reliable daily access to local services or facilities. The only additional public transport service proposed by the Applicant (to be funded initially by the development) is a twice hourly bus service from the site to Billingshurst. Whilst such a service *might* be useful, it can only be useful whilst it actually exists. The Applicant's consultants advise them that: -

*"It is unlikely that the proposed bus service would be commercially viable"*⁴

and

*"Bus services in rural areas tend not to be well used"*⁵.

7.6 Regrettably, both statements are true. West Sussex County Council has confirmed that the proposed service could not receive public subsidy. It would therefore require permanent funding by the Applicant; or through some charge on residents of RGV mandated by a planning obligation. There is no proposal from the Applicant as to how this could be secured. No other public transport improvements are proposed.

7.7 On the Applicant's own evidence, existing public transport services are barely sufficient for the small current population of the area. The only additional service proposed by the Applicant, to reduce car journeys to and from the site, will be neither viable nor sustainable. Whilst it operates it would have a minimal impact on reducing car journeys as it would not serve access to schools, further education, or local facilities. Any resident without a car would be 'marooned' in this supposedly sustainable location.

7.8 The Applicant seeks to sidestep the shortcomings of their proposals' impact in relation to sustainable travel by suggesting: -

*"[it is] difficult to gauge without knowing about the actual people who will be attracted to live at Rickman's Green Village and their precise needs"*⁶

⁴ Proposed Bus Service Technical Note; Transport Assessment Annex C Pg 10

⁵ Proposed Bus Service Technical Note; Transport Assessment Annex C Pg 11

⁶22/03131/OUTEIA | TRANSPORTATION ASSESSMENT, ANNEX C, BUS SERVICE-5154224: 2.1 General Considerations

It is, in fact, entirely predictable that any residents of RGV will be forced into being totally car reliant or remaining chronically isolated. If they are unable to afford to run a car, or in some cases more than one car, they will be unable to access the services and facilities they need. This is completely contrary to every principle of good place-making as set out in all relevant CLP and NPPF policies.

7.9 Considering the issues raised by para 7.8, the Parish Council respectfully requests that the LPA reminds itself of the following government studies and statistics on the reliance upon / use of private vehicles within rural communities: -

- 'Future of Transport: Rural Strategy – call for evidence (28 September 2021)' identifies a range of issues for residents, businesses and visitors in rural areas including dependence on the private car, access to key services and access to employment.
- Department for Transport - National Travel Survey 2021: Travel by region and rural and urban classification of residence 31st August 2022 findings show that people living in rural areas:
 - rely more on cars as a means of transport;
 - are more likely to own a car than urban residents, with only 5% of households living in rural villages, hamlets and isolated dwellings having no car;
 - 58% of households living in rural villages, hamlets and isolated dwellings had two or more cars, more than twice that of those living in urban conurbations;
 - people living in the most rural areas made fewer walking trips and more car trips than the overall average;
 - people living in the most rural areas rely more on the car, which accounted for 75% of all their trips in 2021.

7.10 At this juncture, it is also worth drawing attention to the Applicant's suggestion that the bus service would/could be used to provide opportunities for commuting to the site for employees / users. This further undermines their argument that the WFP will provide economic sustainability for the settlement itself. Within the Applicant's Whole Farm Plan cover letter dated 28th April 2023 and submitted against the WFP application, they state: -

"A Travel Plan addendum supporting this application provides additional details in respect of [...] the fare-free bus service that is proposed to serve

the site as part of the wider Rickman's Green Village masterplan (reference 22/03114/FULEIA and 22/03131/OUTEIA). This proposed service would operate twice hourly from the site to Billingshurst, allowing for onward travel to other key destinations. This would therefore potentially provide free bus travel for future employees and users of the Whole Farm Plan, as well as all existing and future residents of Rickman's Green Village and surrounding areas."

7.11 Whether or not employees/users travel to the site via public transport or private car this would still represent a marked increase in traffic movement in a rural area.

7.12 The road network in the parish consists of minor C class roads or unclassified local roads intended for local traffic; there are no A or B class roads. The roads are narrow country lanes without lighting and/or pavements. To support a large housing development costly road improvements may be required, which would likely be frustrated by the situation of listed buildings, the conservation areas and other environmental factors highlighted below.

7.13 NPPF paragraph 85 states that planning decisions should: -

"recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport" and "in these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)..."

7.14 However, this relates to situations of necessity and availability, where there are no better alternatives. In this case there is no necessity to provide additional development at Crouchlands Farm and no necessity to construct a residential development which makes residents entirely reliant on private transport.

A 15 Minute Community?

7.15 The Applicant refers to their desire to create a "15-minute community", which they describe correctly as: -

“a ‘15-minute community’ is one in which most day-to-day services and facilities can be accessed within a 15-minute walk and or cycle ride”⁷

- 7.16 The ‘15 minute’ neighbourhood or community is a desirable objective. It is the basis of much thinking in contemporary urban design and many proposals for sustainable communities. It is therefore disappointing that the Applicant clearly either does not understand the concept or has deployed the terminology as ‘greenwashing’ for this proposal. The RGV is not and could never be anything approaching a 15-minute community – in fact it is the antithesis of the concept.
- 7.17 The Applicant relies upon the notion that access to local villages such as Plaistow can be captured as an element ‘15 minute’ accessibility, even though none are in fact within a convenient 15-minute walk or accessible cycle ride. The quickest walking time would be to Plaistow at 24 minutes by road. Please refer to the Parish Council’s ‘15-Minute Community’ report, submitted with this document.
- 7.18 Crucially, villages such as Plaistow, Ifold, Kirdford, and Loxwood do not cater fully for the day-to-day services and facilities required by their own residents and access to those centres would provide very limited assistance to residents at RGV who would likewise have to travel outside of the area on a routine basis, via private car.
- 7.19 The Chartered Institute of Highways and Transportation (CHIT) identify requirements for good walking networks: -
- ‘Convivial’ - talks to routes being safe.
 - ‘Comfortable’ - that walking requires high quality pavements and as much freedom from the noise fumes and harassment of other vehicles.
 - ‘Convenient’ - routes should apply to all users, including those with impaired mobility.⁸

The CHIT recognises, which the Applicant appears not to, that accessibility by walking and cycling reduces with age. Over the whole population, approximately 15% of people, most of them elderly, have an impairment that affects their mobility. This effects 35% of people over 70.

⁷ 22/03131/OUTEIA | TRANSPORT ASSESSMENT-5103532: 2.2 Rural 15-minute Community

⁸ Chartered Institute of Highways & Transportation (CHIT) Planning for Walking April 2015

7.20 As CDC correctly identifies, there is poor connectivity between settlements via minor roads⁹. The existing volume and speed of traffic already impacts adversely on residents, creating noise, danger and reducing the willingness to engage in active travel, such as cycling or walking to local facilities/services. Existing residents are reluctant to engage in outside leisure activities, such as running and horse riding, on the road network. The RGV proposal contributes no improvements to these deficiencies.

7.21 A 15-minute neighbourhood is one in which residents have safe, easy to access and desirable opportunities to access services such as education, employment and shopping by active travel means or possibly using public transport. It is self-contained and has a clear local identity. Nothing about the RGV proposals can be said to adopt this approach.

7.22 As CDC states: -

“as well as concerns around per capita greenhouse gas emissions from transport, there is also a need to consider: issues of traffic congestion within village centres and along rural lanes; the potential to achieve good / safe vehicular access, and access for pedestrians and cyclists (this can sometimes prove challenging in rural settings....”¹⁰

7.23 The Applicant seeks to dissuade car ownership/usage by not providing minimum parking requirements within the development and locating parking away from dwellings. This methodology is highly unlikely to reduce the requirement for car ownership by residents of RGV, by virtue of the site’s unsustainable isolated location. This strategy is more likely to create a congested housing estate with inappropriately parked cars, causing conflict between neighbours; frustrated movement around the estate e.g., delivery vehicles and potential hazards for children at play and access for emergency vehicles.

7.24 The local and national requirement to direct development growth to locations able to support a reduced need to travel, or facilitate sustainable travel, does not lend itself to situating a housing development of either 108 or 600 houses (with 30% affordable / social housing) within the countryside. The Parish Council fully agrees with CDC’s evidence and assessment that: -

⁹ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 14

¹⁰ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 59

“local accessibility to community infrastructure and sustainable transport connectivity are key considerations that have influenced the strategy, with ‘lower’ growth [...] supported at the two parishes likely to be associated with highest car dependency.”¹¹

Section 8: Social and Community Infrastructure Issues

8.1 As proposed, the RGV would be devoid of the community facilities and infrastructure essential for a new community. This is mainly because the Applicant has failed to incorporate these into their proposals, but it is also important to recognise that a community of 600 homes in an isolated location would struggle to support such facilities in just the same way that established communities of a similar size have found difficult. Whilst it might benefit in a small way from the proposed facilities of the WFP, these are not the practical or necessary services that a community requires on a day-to-day basis.

Education

8.2 Although the Applicant makes much of offering a site for a new primary school, West Sussex County Council has confirmed that it is highly unlikely to be prepared to make provision for the running costs of a new two form entry primary school at RGV. All pre-school and primary age children will therefore be required to travel off site to schools in other locations. The Applicant has made no assessment of the capacity of those schools or offered planning obligations under a Section 106 agreement to fund additional places. It is inevitable that journeys to and from school will be made by car since there will be no other mode of transport safe or suitable for young children. This would further emphasise the isolated nature of the development and its status as a dormitory rather than a functioning community.

8.3 Secondary school places for residents would be provided outside of the Chichester district, in centres which have already seen significant development. Children from the parish must commute to either Billingshurst (Horsham District) 11km away, or Midhurst (within the SDNP) 23km away to attend secondary schools. During the eCLP review process, transport concerns were raised by neighbouring Waverley Borough and Horsham District. Likewise, Surrey County Council highlighted their concerns: -

¹¹ Sustainability Appraisal (SA) of the Chichester Local Plan, para 9.6.4 pg., 50

“regarding higher growth in the northeast plan area on transport grounds, highlighting the poor public transport connectivity and general rurality of the area”¹².

8.4 The Parish Council also notes that there are: -

“three institutions in the Plan area that offer further education for 16–18-year-olds (all in the southern Plan area), including Chichester College, which is the largest further education institution in West Sussex”¹³.

Regardless of the size of any new settlement (and any unlikely primary school provision) young people will be commuting out of the Parish / North of the Plan Area to attend both secondary school and higher education with the associated traffic/transport impacts this entails.

Social and Recreational Infrastructure

8.5 The area is undoubtedly a beautiful and tranquil rural place to live. CDC recognises that new communities would *“benefit from living in an attractive rural area, associated with historic villages and high-quality countryside”¹⁴*. However, the area does not have the other required social and leisure facilities to meet the needs of a large-scale new settlement. Existing residents must travel out by car to find suitable sports, leisure, entertainment, and shopping facilities.

8.6 There are no proposals for any community building or other shared social infrastructure as part of RGV. There are no proposals for any additional sports facilities. An area is labelled as ‘sports provision’ on submitted plans, but no explanation is given as to what they consist of, how they will be provided, or how they will operate. There are no proposals for allotments.

8.7 There are no proposals for any retail or service-based uses, other than those contained with the WFP which are not, and are clearly not intended to be, of a type relevant to everyday activities even if they were consented. In all likelihood, a development of up to 600 homes in an isolated location will be too small to sustain such facilities and services, once again reinforcing the inappropriate nature of the development.

¹² Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

¹³ Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.7, pg., 3

¹⁴ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

8.8 The Parish Council agrees with CDC's assessment of the Crouchlands Farm site that: -

“the potential for this number of homes to support a suitably comprehensive scheme is highly questionable”¹⁵

The Parish Council agrees with CDC that any new settlement within the parish could not 'go bigger' to comply with the Government's Garden Communities Prospectus (2018) for at least 1,500 home, as the area cannot feasibly deliver the other required infrastructure necessary to support greater housing numbers.

Affordable Housing

8.9 Whilst the proposals would deliver additional affordable and social housing, this can be given only limited weight if those who live in them cannot afford to access the essential services and facilities they need. Living in a rural location without adequate facilities would be isolating and create additional social and health problems which should be avoided by choosing appropriate locations for development. For example, there are no children's centres, libraries, community centres or public service access points within walking distance or accessible by public transport.

8.10 The cost of living within a rural area can be high without access to larger supermarkets and relying on higher priced goods in small retail outlets. Billingshurst - which will theoretically be accessed by residents by the proposed additional bus service - does not have a large supermarket.

8.11 Affordable housing, like market housing, should be located where it is sustainable, and its residents have access to their reasonable daily requirements. It is unacceptable to suggest that the urgent need to increase the supply of affordable housing somehow excuses the need to provide its residents with good living conditions, employment opportunities and a sustainable lifestyle.

Water and Sewerage

8.12 The Parish Council agrees with CDC, that the level of allocated development within this area needs to be supported by sustainable and deliverable infrastructure from partner agencies, such as Southern Water. The Council agrees with CDC's assertion that: -

¹⁵ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 35

“there is typically potential to deliver capacity upgrades, but there can be challenges, hence there is a case for directing growth to locations with existing capacity, with a view to avoiding the risk of capacity breaches.”¹⁶

8.13 Southern Water’s ability to meet and manage higher capacity in a timely manner is outside the direct control of CDC. It has, to date, been unable to cope with the greater demand on its infrastructure from new development within Loxwood village and the surrounding area. There is already a disconnect between the demands of existing new development and Southern Water’s ability to address these. The foul drainage system which runs from Plaistow through Ifold suffers from overflow during heavy rainfall, with manholes lifting and raw sewerage running down the roads in Ifold and sewerage backing up in people’s homes. Southern Water have been unable to address these ongoing public health concerns, which will be exacerbated by larger scale development.

8.14 The Applicant’s proposals for addressing the current requirement to demonstrate water neutrality in relation to the applications in the North Sussex Water Resource Zone (WRZ) may best be described as ‘optimistic’. The water neutrality report submitted - prepared by Ward Associates - addresses only Phase 1 of the proposal. It states that Phase 2 would be achieved on the same basis without any evidence to demonstrate that either is possible. Achieving neutrality on both phases would rely on the provision of potable water from a new borehole licensed on the site, even though it is acknowledged by Ward Associates that no proving or testing of such a borehole has taken place to validate the proposal. This is simply unacceptable as a basis on which to consent new development.

8.15 The agreed wider Mitigation Strategy for the WRZ includes areas outside Chichester district which will be delivering additional development as part of their own local planning process. These areas are considerably more suitable for large scale growth than the rural northern parishes of Chichester, and nothing should be allowed to interfere with their delivery. The Parish Council fully endorses CDC’s argument that: -

“it would be very challenging to justify restricting growth in Crawley or Horsham [established settlement hubs, which are currently used by parish residents to access education, work and leisure] to allow for a high growth in the Chichester northeast plan area, which is relatively poorly suited to a high growth strategy in wide-ranging respects, as a relatively rural area.”¹⁷

¹⁶ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

¹⁷ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 16

Section 9: Landscape and Biodiversity Issues

- 9.1 Plaistow and Ifold parish is rural and lies partly within the South Downs National Park. Although Crouchlands Farm is not inside the national park boundary, its landscape is part of the setting of the national park and policies in the South Downs National Park Local Plan will therefore be a material consideration in determining the application. For residents and visitors, the parish landscape is as valued and valuable as that with the park. The parish has long been recognised as being remote and tranquil and has good levels of biodiversity with low density, small villages, and hamlets. There is an obvious need for all policy proposals to be sensitive to the objects of the national park authority.
- 9.2 The parish landscape is recognised in CDC's Landscape Capacity Study (March 2019) as having low, medium/low and medium capacity to accommodate new development. It has no ability to accommodate larger scale development without significant adverse impact.
- 9.3 Delivering additional dwellings cannot be considered in isolation from the impact of new populations on existing communities and landscapes. Whilst small scale growth can be acceptable or even desirable, the Parish Council fully endorses CDC's approach to conserve the rural character of the area; its high-quality landscape; and to minimise the impact on the historic environment by avoiding any large-scale new development.
- 9.4 Any new settlement at Crouchlands Farm would immediately adjoin the area of Plaistow and Ifold Low Weald, sub-area 156, which is found to have low/medium capacity for development, the conclusion states: -

Sub-area 156 has a medium / low capacity, constrained by its reasonably rural character, distinctive topography and 'knolls' and its role as an integral part of the rural setting of nearby settlement and conservation area. The area is well-served by PRow with links to the South Downs National Park. There are panoramic, mid and distant views, particularly towards the south and south-east from PRow and views from tracks, rural lanes and the conservation area. The area retains a clear sense of history through its historic medieval assarted field pattern, presence of many listed buildings and their settings, historic farmsteads, and the historic settlement core. Has a

strong, cultural association with the iron working industry. Many areas of ASNW and SNCI's present. The area contains many of the characteristic features typical of the wider LCA, well used and travelled by locals and visitors although tranquillity has been negatively affected by traffic and aircraft noise, and suburban elements, including paddocks, equestrian uses, and modern styles of housing around the settlement edge...It is possible that a very small amount of development may be accommodated within existing clusters of farmstead settlement, larger garden plots, paddocks or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and locally distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. New development in this area would extend the built edge southwards and eat into adjacent paddocks and historic fields. Although the flat land and vegetation structure provides opportunities for small scale barn/ single house forms of development, within paddocks, this would further dominate the village edge and add pressure to sensitive ecological and landscape features. The combination of these factors would result in a largely negative effect on settlement pattern.

9.5 The landscape at Crouchlands Farm is not dissimilar to the adjoining sub-area 156 and many of the statements above apply equally - it is well traversed with PROW, with long and short views; there are ancient woodlands, historic links to glassworks, and is valued by the local community. Dismissed appeal decisions concerning modest development both at the Crouchlands Farm site itself and in the immediate vicinity (within metres of Crouchlands Farm) have referenced the importance of the character and appearance of the landscape, in particular:

- APP/L3815/W/22/3296675 | Little Wephurst, Walhurst Lane, RH14 0AE | Located 1200m from Crouchlands Farm | Development of a replacement dwelling following demolition of an existing dwelling.
- APP/L3815/W/18/3206819 | Foxbridge Golf Club, Foxbridge Lane | Located 800m from Crouchlands Farm | Development of 10 dwellings and vehicular access to replace the existing Golf Club.
- APP/L3815/W/16/3150857 | Hardnips Barn | Located at Crouchlands Farm | Development of a wood store and garden store on land adjacent to Hardnips Barn.

9.6 The development of a new settlement within the parish would have further detrimental impact on a landscape which was a productive working dairy farm before its unlawful use as a biogas plant (confirmed in the 3 Appeal Decisions reference APP/L3815/C/15/3133236, 3133237 and 3134445). No credit should be given to the changes brought about by this unlawful activity in reaching a decision about future use.

9.7 The Parish Council notes Government's aspiration within the proposed changes to the NPPF to strengthen the protection afforded to land valued for food production to: -

"make sure that the food production value of land is reflected in planning decisions that we propose will take effect from spring 2023".

The value of land for food production is not only its ability to grow crops, but also to graze livestock e.g., dairy and beef farming. The Applicant states that the land on which the new housing estate would be built is low grade agricultural land and therefore suitable for development. However, the two Chichester Local Plans recognise the area as "Low Weald" landscape, which is characterised by a mix of pasture and medium to small scale arable fields. It is this pasture that defines the area landscape. The irreplaceable loss of such pasture would devastate the very character of the Low Weald.

9.8 Most Low Weald pasture would be classified as 'low grade', but nevertheless supports many farms. Crouchlands Farm was a viable dairy operation for many decades. It is therefore untrue to suggest that Low Weald landscape – however it is graded – is not suitable for farming, or that the loss of such land has no impact on food production.

Biodiversity

9.9 The parish has extremely good levels of biodiversity with large tracts of woodland, many of which are designated Ancient Woodland, ancient hedgerows, and medieval field patterns. Existing settlements are all low density with very high levels of tree cover, particularly in Ifold. The Parish is within the SSSI Impact Zone for Chiddingfold Forest SSSI (Site of Special Scientific Interest) and within the Zones of Influence of The Mens Special Area of Conservation (SAC) and Ebernoe Common SAC, both of which have been designated for their bat populations, particularly Bechstein and Barbastelle populations.

9.10 There are many protected species within the parish, including badgers, dormice, great crested newts, and adders, including many nocturnal species, particularly the rare Bechstein and Barbastelle bats. The parish also provides habitat for the extremely rare Woodland White butterfly.

9.11 Development brings noise, human disturbance, vehicle movements and light pollution. The parish, with its low housing numbers, has little light pollution and there is no street lighting within the existing settlements. This contributes significantly to the South Downs National Park dark skies policies. The Parish Council considers that any development above the level proposed by CDC in the emerging Local Plan would be unacceptable and inconsistent with the policy requirements of the NPPF in its impacts on biodiversity.

Section 10: Climate Change and the Climate Emergency

10.1 The Parish Council supports the eCLP's recognition of the Climate Emergency and the need to address climate change via strategic policies. The Parish Council endorses CDC's conclusion not to promote unsustainable larger scale development within the parish due to its high dependency on private cars to circumvent its remote rural location, poor transport links, limited local employment, poor infrastructure, and amenities – which cannot be addressed through additional development.

10.2 CDC Climate Emergency Policy states: -

'Locating development is the heart of the plan making process. The following are all top priorities in plan making:

- *Reducing the need to travel to access shops, employment, and facilities.*
- *Providing development in locations where there are ample opportunities to walk, cycle and use public transport, rather than car use being the only reasonable option'*

10.3 The Parish Council also supports the eCLP's objectives regarding climate change, the natural environment and design and heritage and applauds CDC for their efforts with the draft Plan to account for the impacts of climate change by locating development in the right place. There are no proposals contained within these applications to provide exemplar levels of on-site energy generation or storage, or to build homes which would provide a new benchmark for 'fabric first' energy conservation.

10.4 The Parish Council supports the need to provide good quality, affordable housing and agrees that some growth in the parish would be beneficial, but this must be limited to that which is sustainable within the parameters of the NPPF and would have an acceptable environmental impact. The Parish Council supports CDC's eCLP evidence-based housing allocation for the parish (25 dwellings).

Section 11: Conclusion

11.1 In conclusion, the Parish Council asks the LPA to refuse these applications for residential development at Crouchlands Farm alongside a decision to refuse the application for the WFP. Residential development of this scale would be contrary to the strategic policies of the Chichester District Local Plan 2014 – 2029, as well as contrary to the emerging policies of the Local Plan 2021 – 2039. It would not comply with the policies of the National Planning Policy Framework.

11.2 The design and infrastructure proposed for the settlement is entirely inadequate and unsuitable, which it could not otherwise be - given the location and nature of the proposals. It would not be a sustainable community and it would not be a good place to live. Its adverse impact on the landscape and on the local environment is entirely unnecessary and avoidable. The relationship of the proposed residential development to the WFP is misguided and fails to give adequate consideration to basic principles of master-planning and new settlement design.

11.3 Taken together these provide significant and demonstrable reasons to refuse the applications based on sound and evidence-based planning considerations.

Appendix A

A1 There have been numerous dismissed planning appeals decisions within the Parish area - relating to both the application site and sites in very close proximity - that reinforce the unsuitability of this area for the type of development that is proposed by the Applicant.

A2 These appeal decisions have been made within the CLP period and apply the NPPF. They therefore provide precedent and guidance as to the correct application of the NPPF (as

well as current Local Plan development policy) to residential development within this area; and must, therefore, form the starting point for consideration of these current applications.

A3 Unless the Local Planning Authority can robustly evidence how and why the current applications differ significantly from these decisions - made firstly by the LPA itself and latterly by a Planning Inspector when dismissing the Appeals - decision makers must follow the planning principles set out/enforced by precedent.

A4 Given that the current applications are for a development far greater than the below relatively modest proposals, which were all refused, it follows that the current applications should not / cannot be permitted on the grounds of a myriad of relevant NPPF and CLP policies.

A5 In every appeal, one of the main issues for dismissal was the effect that even minor development (in comparison to the current proposals) would have on the character and appearance of the surrounding rural landscape, in contravention of NPPF paragraphs 130 and 174. It is therefore inconceivable that up to 600 dwellings within the same landscape could ever be considered acceptable.

A6 The below table sets out a summary of the Planning Appeals Decisions; a more detailed overview of each case is set out beneath the table (paragraph number indicated below the 'application number').

Application number	Decision Date	Proposal(s)	Policies	Main issues
APP/L3815/W/20 /3271133, Sparrwood Farm Para A7	19/05/21	Stable Barn 25x50mMénage	NPPF 175 (c) Feb 2019 CLP 45, 48, 55	Scale, bulk, height Detrimental significant visual impact Harmful impact on the established landscape character and appearance of the area. The site's rural setting
APP/L3815/W/18 /3206819 Foxbridge Golf Club Para A8	09/05/19	10 dwellings vehicular access	NPPF 78 & 79 Feb 2019 CLP 1, 2, 25, 26, 45	Effect on the undeveloped character and appearance of the Countryside. Noted the policy requirement to conserve and enhance the rural character of

				the area. Development would be heavily reliant on private cars and as such would be unsustainable development.
APP/L3815/W/22 /3296675 (APP/L3815/W/18/ 3206331 17.01.19) Little Wephurst Para A9	19.12.22	Single replacement dwelling	130c) NPPF 2021 CLP 33, 40, 48	Adverse impact on the character and appearance of the area. Massing and scale not sympathetic to its setting. Visible from several public vantage points.
APP/L3815/W/16 /3150857 Hardnips Barn Para A10	10.10.16	Wood store and Garden store on land adjacent to Hardnips Barn	NPPF 2012 paras 17 and 118 CLP 1, 25, 45	Unacceptable harm on the secluded rural character and appearance of the area. Effect on protected species and ancient woodland. Area consisted of undeveloped open countryside.
APP/L3815/W/15 /3141476 The Coach House Para A11	25.05.16	Change of use to a Club for Fitness Training, Yoga, Spiritual Healing and Wellbeing	NPPF 2012 CLP 2, 48, 39, 45	Effect on tranquil and rural character and appearance of the Countryside. Effect on the amenity of nearby Public Rights of Way. Unsustainable development. Surrounding roads lightly trafficked. The level of use indicated by the proposed parking would diminish the experience of those using the PROW. The facility would be reliant on private transport which is contrary to the sustainable development aims of the Local Plan and policies.
APP/L3815/W/15 /3134837	22.03.16	Retention of an existing	NPPF 2012, para 28 CLP 1, 25, 33, 37, 45	Harmful visual impact on the character and appearance of the surrounding rural landscape. Conflicted with Planning

Nell ball Farm Para A12		mobile home		policies that require development to enhance the character of the surrounding area with minimal impact on the landscape and rural character of the area.
APP/L3815/W/15/3129444 Little Springfield Farm Para A13	01.03.16	Demolish Industrial buildings and erect three dwelling houses	NPPF 2012 CLP 1, 2, 33, 39, 48	Unsustainable development due to poor accessibility. Effect on the character and appearance of the area. Significant changes to the character and appearance of the location. Reference to framework which notes that the intrinsic character and beauty of the countryside should be recognised.
APP/L3815/C/15/3133236 Crouchlands Farm Para A14	10.10.17	Biogas plant without permission	NPPF 2012 CLP 25, 39	Highways safety. Local roads are narrow country lanes. Fears for safety caused through meeting lorries and walking on a road with no pavement, or when riding a horse or bicycle on the carriageway. Vehicle movements dangerous to other road users and caused disturbance to local residents. Effect on rural character of the area. HGV impact on tranquility, increased levels of intimidation and reduced residential amenity are experienced each time an HGV passes. Living conditions of nearby residents. Noise and vibration from the traffic would be unacceptable in this rural location and detrimental to the character of the area. Primary purpose of agricultural land should be for growing food.

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A7 Sparrowood Farm | APP/L3815/W/20/327113 | Decision 19/05/2021 | Relating to the proposed erection of a Stable Barn and 25 X 50m Ménage.

- **Located 1500m from Application site.**

The main issue is considered to be the effect of the proposed development on the character and appearance of the area. It was noted that the scale and bulk and height of the proposed Barn would be significant and visually prominent and as a result would have a harmful and detrimental impact on the character and appearance of the area. It was noted that it would have significant visual impact on the site's rural setting and the area's established landscape character. The Inspector noted that the appeal site made a positive contribution to what is an attractive rural landscape surrounded by ancient Woodland and the benefit of extensive views from various public vantage points and concluded significant harm to the character and appearance of the open countryside and landscape character of the area would be contrary to CLP policies 45, 48 and 55.

A8 Foxbridge Golf Club | APP/L3815/W/18/3206819 | Decision 09/05/2019 | Concerning a development for the construction of 10 dwellings and vehicular access to replace the existing Golf Club.

- **Located 800m from Application site**

One of the main issues was considered to be the effect of the development on the character and appearance of the Countryside. The Inspector noted that whilst the impact of the proposal on the landscape of the area may not be severe, the proposal would nevertheless have an adverse effect on the undeveloped character of this part of the countryside. It would be seen as a substantial built development in a rural setting from Public Rights of Way and buildings in the surrounding area. The Inspector noted the policy requirement to conserve and enhance the rural character of the area, a matter in which he found some harm. In addition, the inspector noted that development would be heavily reliant on private cars and as such would not amount to sustainable development.

A9 Little Wephurst | APP/L3815/W/18/3206331 | Decision 17.01.2019 | Relating to the erection of single replacement dwelling.

- **Located 1200m from Application site**

The main issue was considered to be the impact of the development of the character and appearance of the area. Where the Inspector noted that the massing and scale of the development would not be sympathetic to its setting and by virtue of the scale and massing, which could be viewed from several public vantage points and would have an adverse impact on the character and appearance of the area.

A10 Hardnips Barn | APP/L3815/W/16/3150857 | Decision 10.10.2016 | Relating to the erection of a wood store and garden store on land adjacent to Hardnips Barn.

- **Located within the Application site**

The main issue was considered to be the effect of the building on the character and appearance of the area and the effect of the building on protected species and ancient woodland. The Inspector noted that the area consisted of undeveloped open countryside interspersed with other tracks of woodland of varying sizes giving the surroundings a secluded rural character and appearance not with-standing the proximity of the complex of large-scale farm buildings at Crouchlands Farm. The Inspector noted that the barn would be seen as an isolated and alien feature in hitherto largely underdeveloped rural surroundings and concluded that the building caused unacceptable harm to the character and appearance of the surrounding area and as such does not conserve or enhance the rural character of the area and quality of the landscape. The Inspector further noted that an increase in the level of human activity at the appeal site, as a result of the use of the single building and the use of artificial lighting in or around the building together with associated external storage, would all cause a further progression of erosion to the secluded rural character of the surrounding countryside.

A11 The Coach House | APP/L3815/W/15/3141476 | Decision 25.05.2016 | Related to a change of use to a Club for Fitness Training, Yoga, Spiritual Healing and Wellbeing.

- **Located 3500m from Application site**

The main issue was considered to be the effect of the proposal of the character and appearance of the Countryside having regard to tranquillity and nearby Public Rights of Way and also whether the proposal would be a sustainable development. The Inspector noted that surrounding roads were lightly trafficked with the absence of any significant

development and the surrounding character was resulting in a very tranquil area. The Inspector noted there would be sufficient parking for 25 cars, 10 motorcycles and 50 bicycles which indicated a significant intensification of activity within the tranquil area. The Inspector noted that based on the level of use indicated by the amount of proposed parking, the number of activities and intensity of use, the proposal would create the perception of a significant amount of activity on the site which would diminish the experience of those using the PROW in a tranquil area of the Countryside and would have an adverse effect on the tranquil and rural character of the area. The Inspector further noted that the facility would be reliant on private transport which is reflected in the proposed amount of parking and as such would run counter to the sustainable development aims of the local plan and policies.

A12 Nell ball Farm | APP/L3815/W/15/3134837 | Decision 22.03.2016 | Concerned the retention of an existing mobile home.

- Located 1600m from Application site

The main issue was considered to be the visual impact of the development on the character and appearance of the surrounding rural landscape and concluded that the development would harm the character and appearance of the area conflicting with the Planning policies which require development proposals to enhance the character of the surrounding area with minimal impact on the landscape and rural character of the area.

A13 Little Springfield Farm | APP/L3815/W/15/3129444 | Decision 01.03.2016 | Related to the proposals to demolish Industrial buildings and erect three dwelling houses.

- Located 1500m from Application site

The main issues related to whether the development would be a sustainable development with regard to the accessibility and the effect of the proposal on the character and appearance of the area. The Inspector concluded that the proposal would result in significant changes to the character and appearance of the location and referred to the framework which notes that the intrinsic character and beauty of the countryside should be recognised.

A14 Crouchlands Farm | APP/L3815/C/15/3133236 | Decision 10.08.2017 | Related to Highways safety, living conditions of nearby residents and the rural character of the area.

- Application site itself

The Inspector noted the roads around Crouchlands Farm are narrow country lanes where traffic is likely to be restricted to the use by residents, the farm enterprise and occasional delivery vehicles and noted fears for safety caused through meeting lorries and walking on a road with no pavement or when riding a horse or bicycle on the carriageway. The Inspector further noted that in rural situations the impact on tranquillity, increased levels on intimidation and reduced residential amenity are experienced each time an HGV passes. The Inspector found that the vehicle movements proved dangerous to other road users and caused disturbance to local residents. Noise and vibration from the traffic would be unacceptable in this rural location and detrimental to the character of the area. The Inspector also noted that the primary purpose of Agricultural land should be for growing food.