

## PLAISTOW AND IFOLD PARISH COUNCIL



14<sup>th</sup> March 2024

Ms. Jo Prichard  
Senior Planning Officer  
Chichester District Council  
Sent via email: [jprichard@chichester.gov.uk](mailto:jprichard@chichester.gov.uk)

Dear Ms Prichard,

**Re: 22/03114/FULEIA | Erection of 108 dwellings at Crouchlands Farm**  
**Re: 22/03131/OUTEIA | Outline application for 492 dwellings at Crouchlands Farm**  
**Re: 22/01735/FULEIA | Regeneration of Crouchlands Farm, Rickmans Lane Plaistow Billingshurst West Sussex RH14 0LE**

Thank you for re-consulting the Parish Council following the submission of additional and amended documents in relation to planning applications 22/03114/FULEIA and 22/03131/OUTEIA.

The Parish Council does not consider that the additional information has resolved any of the reasons why these applications should be refused and continues to **object** to the proposals in the strongest possible terms. We await a formal notification of re-consultation for application 22/01735/FULEIA and makes no comments ahead of this notification at this point, other than to note our previous comments on the way in which these applications are interlinked.

### Highways and Transport

The applicant has provided more detailed additional information in support of its highways and transport case, and in particular has now submitted the previously missing Transport chapter of the Environmental Statement. In response, we submit two reports prepared by our appointed transport consultants SW Transport Planning Ltd. These provide their analysis of the impact and mitigation proposed for 22/03114/FULEIA and 22/03131/OUT as set out by the applicant and its consultants.

The documents we attach are:

- Rickman's Green Village Phase 1 (Planning reference 22/03114/FULEIA) Further Objections on Highways and Transport Grounds 5<sup>th</sup> March 2024 Ref SWTP P1081-04.
- Rickman's Green Village Phase 2 (Planning reference 22/03131/OUTEIA) Further Objections on Highways and Transport Grounds 5<sup>th</sup> March 2024 Ref SWTP P1081-05

For ease of reference, we have also attached an extract from the Parish Council's letter of objection dated 6<sup>th</sup> June 2023, Section 7 Travel and Transport Issues. As with application material this makes

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references to the previous version of the National Planning Policy Framework but in relation to our comments only paragraph references have changed. We have also included an extract from Section 7 -The 15 minute Community analysis.

Our consultants' analysis demonstrates comprehensively that the proposed development is unsustainable and cannot possibly meet the applicant's stated objective that it should be a 'new rural settlement which is not car-led'. The measures it suggests are either unachievable or undeliverable or simply would not work. The reason for that is simple – it is housing development in an isolated location with little or no provision of the services and facilities that residents will require to meet their everyday needs. The facilities provided with the 'whole farm plan', even if permitted, would be entirely inadequate or unsuitable to support housing on this scale. As a result, and in the absence of any credible proposals to enhance public transport, residents and visitors would be completely reliant on private cars, with a commensurate impact on the local highway network and on the sustainability credentials claimed for the development.

The Department for Transport 'Future of Transport'<sup>1</sup> report published in 2023 states that:

*“Survey evidence shows that people in rural areas want to travel conveniently, safely and at a reasonable cost. For many in rural areas, this means completing most journeys using a private car. Walking, cycling, public transport and taxis provide additional options, but these do not always fully meet the needs of local people. Living in a rural area often means travelling longer distances for everyday journeys: travelling to work, school or to access services like healthcare and shopping. Most people will rely on a personal vehicle to get to work, take children to/from school or to see friends and family. “*

That report confirms that on average people in rural areas drive 2,000 more miles per person per year than those in urban areas. Placing additional large-scale housing development in a remote rural area cannot constitute sustainable development as defined in planning policy. As our consultants' demonstrate it will inevitably require people to drive substantial distances to get to work, shop or access services and none of the measures proposed by the applicant would mitigate this.

It will be very apparent to anyone living or observing our area that few people will be seen cycling home with a weeks' worth of grocery shopping balanced on their handlebars. It is not convenient and certainly not safe; they either get in their car or order online for delivery. Reaching work or transport hubs requires car journeys, often combined with the 'school run'. Leisure trips to friends and family and places of entertainment will all be made by car – there will be no other option.

The applicant's proposal will significantly increase traffic by building a large housing estate in a rural area and introduce changes that have an urbanising effect with no evidence to suggest that they will make any change to the level of car use.

### **Other Matters**

The new and amended documents address some of the other technical concerns raised by statutory consultees and provide information which should have been provided with original applications. There are no changes to the proposals themselves, and none of the objections we raised in our comprehensive response on 6<sup>th</sup> June 2023 have been addressed or resolved by the new submissions. We do not need or wish to add anything further at this time to that previous representation which still stands in its entirety.

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<sup>1</sup> Subtitled 'Helping Local Authorities to unlock the benefits of technology and innovation in rural transport'

## Objection to the Proposed Development

The additional information provided does not and cannot change the fact that the applicant is proposing unsustainable development in the countryside which has no support in national policy, the current Chichester Local Plan or the emerging Chichester Local Plan. Our transport consultants' report demonstrates that the proposals for active travel and public transport (if they can be implemented at all) would make no practical difference to the impact on the highway network and would not provide for walking, cycling or public transport as meaningful options for any residents of such an isolated community.

Quite simply this is the wrong location for a large housing development as evidenced by the fact that the applicant is having to propose such a high level of change to local infrastructure in a failed attempt to satisfy correctly applied planning policy requirements. Regardless of whether the applicant can demonstrate compliance with subsidiary technical requirements, there are overwhelming reasons why both applications should be refused.

We reserve the right to make further representations in the light of the comments of other consultees on any of the documents now submitted in support of these applications.

Yours sincerely,

*J Bromley*

Clerk & RFO of Plaistow and Ifold Parish Council

cc. District Cllr. Gareth Evans; District Cllr. Charles Todhunter; Mr. Andrew Frost; WSCC Stephen Gee.