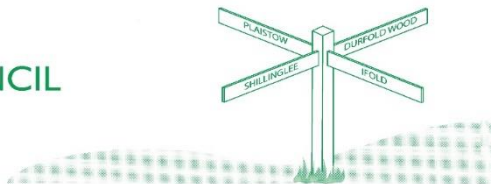


PLAISTOW AND IFOLD PARISH COUNCIL



1st July 2022

Kayleigh Taylor
Planning Officer
Chichester District Council
East Pallant House
1 East Pallant
Chichester
PO19 1TY

Dear Kayleigh Taylor,

Re: 22/01423/EIA | Request for an EIA Screening Opinion in relation to a proposed redevelopment of former Foxbridge Golf Club. | Foxbridge Golf Club Foxbridge Lane Kirdford Billingshurst West Sussex RH14 0LB

Further to a meeting of Plaistow and Ifold's Planning & Open Spaces Committee on 29th June, the Parish Council makes the following comments in relation to the above referred to application.

The Council notes the purpose of an Environmental Impact Assessment (EIA) as detailed on the GOV.UK website and feels that it is important to keep this central aim at the fore. Notably to:

"...protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process [...] The aim of Environmental Impact Assessment is also to ensure that the public are given early and effective opportunities to participate in the decision making procedures."

The purpose of Environmental Impact Assessment

<https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment>

The Parish Council accepts that EIAs will only apply to a small proportion of developments; however, The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) provides the legal framework to enable Local Planning Authorities (LPA) to correctly identify those projects which are considered

- a) EIA Development and
- b) likely to have significant effects on the environment.

EIA Development

Reg 3 of the EIA Regulations states:

“The relevant planning authority, the Secretary of State or an inspector must not grant planning permission or subsequent consent for EIA development unless an EIA has been carried out in respect of that development.”

The Regulations define an ‘EIA development’ as:

“development which is either—

(a) Schedule 1 development; or

(b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size, or location”.

The Regulations further define what constitutes either Schedule 1 or Schedule 2 development. The Parish Council agrees with the Applicant that Schedule 1 does not apply. Schedule 2 development is defined as:

“development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

(a) any part of that development is to be carried out in a sensitive area; or

(b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development”.

The proposal relates to a new Leisure Development.

Within their public consultation literature, the Applicant has described the proposal as a *“health, eco-leisure and accommodation destination”* and a *“leisure and overnight stay destination”*. Within the current application, the proposal is described as *“a spa and wellness resort with 40-50 bed accommodation and up to 121 holiday accommodation together with a farm shop, restaurant, and bar”* (Application, ‘Proposed Development plans’, pg. 3).

Schedule 2 Category 12 of the EIA Regulations specifies the ‘Tourism and leisure’ developments which are considered EIA development, namely:

“Holiday villages and hotel complexes outside urban areas and associated developments”.

Schedule 2 Category 12 (c)

The applicable threshold in the corresponding part of column 2 is:

“The area of the development exceeds 0.5 hectare”.

The Parish Council asserts that the proposals fall unambiguously within Schedule 2 Category 12 (Tourism and leisure) (c).

The Parish Council notes the Applicant's dismissive comment that the *"proposed development has the potential to fall"* within Schedule 2, Category 12 (c), namely *"Holiday villages and hotel complexes outside urban areas and associated developments"* (Application, 'EIA Screening Criteria', pg.4). The Parish Council would like to draw the Planning Officer's attention to the fact that the proposed development exceeds the size of Shillinglee; is over 50% bigger than Durfold Wood, which has 53 dwellings and would amount to two-thirds the size of Plaistow village. Therefore, the Parish Council is confident that the 121 *"holiday lodges"*, ranging from 1 bed to 4 bed family accommodation – as expressly explained to the Parish Council during a public meeting on 18th May (the public minutes of which can be found on the Parish Council's [website](#) (C/22/062, pg. 2)) unequivocally amounts to a *"Holiday village"* and therefore falls centrally within Schedule 2, Category 12 (c) – rather than only having the *potential* to do so!

The Applicant acknowledges that the *"development meets and exceeds the criteria/threshold for Schedule 2 Category 12 (c) projects"* because *"the proposed development is 24 hectares"* (Application, 'The EIA Regulations', pg. 5).

Additionally, the Parish Council asserts that the development is to be carried out in a sensitive area – a further identification requirement for Schedule 2 development - which was overlooked and downplayed by the Applicant.

At this juncture, the Parish Council respectfully draws the Planning Officer's attention to the LPA's EIA Screening Opinion in relation to Crouchlands Farm, Rickmans Lane, Plaistow, Billingshurst, West Sussex, RH14 OLE (attached for ease of reference). The outcome of this EIA Screening Opinion, and the factors considered therein, *are directly relevant and applicable to the current application*, because *the two sites are no more than 500 metres from one another*.

Consequently, like Crouchlands Farm, Foxbridge is in a sensitive area *"within the SSSI Impact Zone for Chiddingfold Forest SSSI (Site of Special Scientific Interest) and also 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"*.

Given that it can be clearly established that the proposed development constitutes Schedule 2 development – a holiday village within a sensitive area and satisfying the applicable threshold criteria, namely exceeding 0.5 hectare – the next test to establish if the development is EIA development, is whether it is *"likely to have significant effects on the environment by virtue of factors such as its nature, size, or location"*.

Likely to have significant effects on the environment

The Parish Council notes and is disheartened by the Applicant's casual downplaying of the likely environmental effects of the proposals. The Screening request identifies several key issues but offers an inadequate level of assessment as to their likely impact and means of control.

In screening Schedule 2 developments, the LPA must consider the criteria checklist set out in Schedule 3 of the EIA Regulations to ascertain if the proposed development has the potential to have significant environmental effects because of:

- i. The characteristics of the development (such as its nature and size)
- ii. The location of the development; and
- iii. The types and characteristics of the potential impact on the environment.

The Parish Council notes The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 [Screening Matrix document](#) (attached for ease of reference) and, where necessary, will respectfully draw the Planning Officer's attention to relevant 'Screening Criteria Questions'.

On page 5 of the application, the Applicant refers to the 2020 Planning Practice Guidance on EIA (Gov.UK, 2020), which sets out 'Indicative Screening Thresholds' which are intended to help determine whether significant environmental effects are likely. This document has been provided with this response for ease of reference, however can be located on the GOV.UK website [here](#).

With regards to Schedule 2 Category 12 (c) "*Holiday villages and hotel complexes outside urban areas and associated developments*" the following relevant 'indicative criteria and thresholds' and 'key issues to consider' are outlined on page 13:

- Major new tourism and leisure developments which require a site of more than 10 hectares
- Holiday villages or hotel complexes with more than 300 bed spaces
- Visual impacts
- Impacts on ecosystems
- Traffic generation

Major new tourism and leisure developments

It is uncontested that the development requires a site of more than 10 hectares (24 hectares).

The development is certainly new to the area. The Parish Council notes that within the Applicant's public consultation material, they draw specific attention to the "*limited supply of facilities of this kind within Chichester district*".

LOCAL DEMAND & SCHEME BENEFITS



LOCAL DEMAND

The UK has seen a sustained surge in demand for 'staycations' with many consumers now opting to holiday in high-quality accommodation in some of the country's most scenic locations. Currently, there is a limited supply of facilities of this kind within Chichester district.

Delivered as part of a sensitively planned, landscape-led scheme, Foxbridge will address this existing shortfall through the delivery of bespoke holiday lodges available for rent or purchase, together with a new spa accommodation, farm shop, health café, restaurant, clubhouse and gardens. With excellent transport links to towns across the South East and London, the site is well-located for a facility of this kind.

The site is also ideally located to act as a stepping off point for visitors to enjoy everything the region has to offer, including restaurants, vineyards and other visitor attractions. We estimate that the scheme will generate more than £12 million in visitor spending each year, while also sustaining around 75 full time jobs across a range of skill levels.

Similarly, within the application, reference is made to Chichester District Council's (CDC) Local Plan and the importance of tourism to Chichester District's economy and to CDC's Economic Development Service's *"expressed support for the proposed development during the pre-app process, as it is a significant inward investment opportunity and will provide employment opportunities and spending into the wider economy"* (Application, 'Socio-Economics' pg. 8).

The Parish Council challenges the relevance, purpose, and intent of including such comments within the EIA Screening request - when such comments have no relevance to protecting the environment and the likely environmental effects of the proposed scheme. However, the comments do illustrate that the proposal is considered by both the Applicant and CDC as "major new tourism and leisure development" which the Government expressly includes within its 'Indicative Screening Thresholds' to help the LPA determine whether significant environmental effects are likely.

Bed spaces

The Parish Council notes that the Applicant disingenuously downplays the size of the development. Reference is made within the application to the *"40-50 bed accommodation and up to 121 holiday accommodation"*; however, no detail is provided regarding the relevant/actual bed spaces (particularly within the 121 holiday accommodation). However, the Applicant provides relevant detail in their public consultation material, which was reiterated during their presentation to the Parish Council on 18th May at a public meeting (please refer to the first paragraph of pg. 3 above). This detail

illustrates that the development will exceed 300 bed spaces: “The range of accommodation will have one to four bedrooms”. A family unit with four bedrooms may include twin beds in more than one room, double beds, and single beds. Without transparent detail from the Applicant, it is unknown exactly how many bed spaces the development will provide; however, the Parish Council asserts that it will certainly exceed 300. Furthermore, no detail is provided by the Applicant regarding onsite staff accommodation.


FOXBRIDGE
NATURE • TRANQUILLITY • WELLNESS
—
ACCOMMODATION

Our vision is to provide high-quality holiday accommodation, helping to establish Foxbridge as a unique and quality destination for Chichester and local residents to be proud of.

The proposed holiday lodges will not be permanent residences and will solely cater for staycations, addressing this particular market need in the district, helping to ease the pressure of second home demand on the short stay market.

The range of accommodation will have one to four bedrooms, kitchen/dining/TV & games room areas as well as a dedicated external deck or terrace and will be ground & first floor only.

All accommodation will enjoy the use of electric buggies and bicycles for internal site circulation. No cars will be allowed on site past the main car parking area, apart from electric cars and delivery vehicles.

All accommodation will be designed innovatively and sustainably to significantly enhance its immediate setting and aspire to be environmentally friendly. The architecture will support the local ecology by incorporating features such as green roofs, bat and bird boxes.

A 40-50 bed spa accommodation is also proposed focused on wellbeing breaks. The accommodation will be 1 storey at most and designed to high standards that will be entirely screened from surrounding properties and the neighbouring area.



Dropbox link to the Applicant’s public consultation material, provided to the Parish Council:

<https://www.dropbox.com/s/jn24x0tojjq9y38/Foxbridge%20-%20Exhibition%20Boards.pdf?dl=0>

Characteristics of the development

1. Water neutrality

The site is located within the Sussex North water resource supply zone. The Parish Council respectfully asserts that insufficient detail has been provided regarding the true volume of water usage (both construction and operation) and the means of achieving the required water neutrality as specified by Natural England. The Parish Council considers that the proposals would almost certainly lead to an increase in water consumption from the former use as a golf course (from bathrooms, taps, showers,

and washing machines, spar, swimming pools, catering, and landscaping). The Parish Council wishes to draw the Planning Officer's attention to the fact that the Applicant fails to explain where they have ascertained the figures for the site's original water usage as a golf course. Without accurately knowing this information, the Applicant's assertions regarding the so-called improved water consumption and mitigation are of limited benefit. For the past few years, the site has reverted to agricultural use with the harvesting of grass. The issues regarding water neutrality are relevant to the current climate and therefore historical data does not help mitigate the issues faced today.

It is noted that the impact on the integrity on the Arun Valley SPA, SAC and Ramsar resulting from water extraction at Hardham was a material consideration for the LPA when concluding that the Crouchland Farm development constituted EIA development. Therefore, given the proximity of the two sites, unless the Foxbridge development can be robustly distinguished, the issue of water neutrality is central to concluding that the current proposal likewise constitutes EIA development requiring an Environmental Statement.

2. Foul water infrastructure network

It must be a key consideration that the Loxwood Wastewater Treatment Works is currently over-capacity. Southern Water (SW) have failed to keep abreast of the increases in demand on the sewerage infrastructure that recent housing development has created. SW repeatedly respond to planning application consultations by stating that there is no capacity in the system. The new housing developments in the vicinity of the Loxwood Wastewater Treatment Works will have its sewerage stored in underground tanks and tankered offsite at SW expense. Therefore, in the absence of adequate / sufficient mains foul drainage at the Foxbridge site – to service the “40-50 bed accommodation and up to 121 holiday accommodation” - and in the knowledge of

- i. the current over capacity of the local treatment works and
- ii. the Flood 3 zone on the northern edge of the site

the Parish Council requests that proper consideration be given to the treatment of effluent from 121 holiday lodges and 40/50 bed spa accommodation without the risk of pollution to local water courses and associated risk of Environmental damage and risks to human health.

The Parish Council assets that the following ‘Screening Criteria Questions’ from the screening matrix document are directly relevant to this issue and are both answered affirmatively:

“Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?”

“Will the project present a risk to the population (having regard to population density) and their human health during construction, operation, or decommissioning? (for example due to water contamination or air pollution)”

As above, it is noted by the Parish Council that the impact of potential pollution, the risk of major accidents and the risks to human health were material considerations for the LPA when concluding that the Crouchland Farm development constituted EIA development. Therefore, unless the above risks presented by the Foxbridge development can be robustly distinguished, the issues regarding the

foul water infrastructure and flood risks on site should support the conclusion that the proposals constitute EIA development requiring an Environmental Statement.

Location of the development

- Visual impacts
- Impacts on ecosystems

(‘Indicative Screening Thresholds’, 2020 Planning Practice Guidance on EIA (Gov.UK, 2020)

1. Ancient Woodland and protected species

The area benefits from Ancient Woodland (please refer to the attached map). The Applicant recognises that *“the site is bound by [...] Wephurst Wood, an Ancient Woodland, to the east [and] Foxbridge Hanger is also an Ancient Woodland and borders the north of the site”*. The area supports protected nocturnal and diurnal species, the adequate protection of which must be an overriding priority. The Applicant has stated that *“the species identified on the site include bats, reptiles, Great Crested Newts, Dormice, and Badgers [and that] the Clubhouse is used by three species of bats...”* As detailed on page 3, the site is within the SSSI Impact Zone for Chiddingfold Forest SSSI 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.

The proposals present a degree of unnecessary risk to the area’s irreplaceable Ancient Woodland and protected species without adequate detail of how these risks will be avoided. Therefore, the Parish Council requests that proper consideration is given to the risk of disturbance and disruption to Ancient Woodland and wildlife, including nocturnal species.

It is noted that the impact of the development on biodiversity and protected species and designated sites was a material consideration for the LPA when concluding that the Crouchland Farm development constituted EIA development. Therefore, given how close the two site are to one another (500 metres), unless the Foxbridge development can be robustly distinguished, the impact of the development on local biodiversity, Ancient Woodland, protected species, and local designated sites (such as the South Downs National Park, Chiddingfold Forest SSSI and the Zones of Influence of The Mens Special Area of Conservation (SAC) and Ebernoe Common SAC) should support the conclusion that the proposals constitute EIA development requiring an Environmental Statement.

2. Character and appearance of area

In May 2019, when dismissing appeal APP/L3815/W/18/3206819 for the proposed demolition of the existing golf club house and the construction of 10 dwellings (together with vehicular access and car park) the Inspector made extensive reference to the undeveloped character of this part of the countryside and considered that the proposals would harm the character and appearance of this rural area.

The Parish Council submits that the current proposals exceed the historic aspirations for the site and will have a far greater visual impact on the undeveloped character of the area and adverse impact on the area's fragile ecosystems. The current proposals include:

- up to 121 luxury holiday lodges
- 40-50 bed spa accommodation
- farm shop
- restaurant & bar
- a wellness centre
- outdoor sport and recreation facilities (outdoor pursuit centre)
- ecological, swimming and fishing ponds
- ecological parks
- nature trails
- the formation of a new vehicular access from Foxbridge Lane
- internal access roads
- car parking areas
- new hard and soft landscaping
- creation of walking and cycling routes

The Parish Council respectfully request that the Planning Officer satisfies themselves that the car parking areas and the creation of "new vehicular access to the site", "walking and cycling routes" and "internal access roads" do not, in of themselves, constitute Schedule 2 development under part 10. Infrastructure projects (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas and (f) Construction of roads. In both cases, the applicable threshold in the corresponding part of column 2 is "the area of the works exceeds 1 hectare"; and of course, the previously established 'sensitive area'.

3. South Down National Park (SDNP)

The area is otherwise quiet and tranquil countryside with intrinsically dark skies. The site is in very close proximity to the SDNP. Given the site's proximity to Crouchlands Farm (500 meters) it is pertinent to highlight to the Planning Officer the impact of the proximity of the SDNP when concluding that the development constituted EIA development, as the same considerations are relevant to Foxbridge: -

"[the] site is located close the South Downs National Park, the boundary of which runs to the west and south of the site, at a distance of approximately 2.25km to the west and 3.5km to the south and the setting of the National Park would need to be considered."

"Lighting has the potential to cause impact to the protected sites, setting of the nearby South Downs National Park and the wider rural area."

The Applicant states within the application, "the South Downs National Park is approximately 3.7 kilometres (km) to the west of the site and 4.2km to the south of the site" (pg.4).

The Parish Council contends that the slight difference in distance between the two sites is negligible and therefore a moot point. However, were the Planning Officer to conclude that the slight increase in distance between Foxbridge and SDNP did result in the SDNP not being a material consideration within the screening process, the Parish Council would expect to see robust and independently evidenced justification.

Due to its proximity to the SDNP, the Parish Council requests that due consideration be given to any impact the development would have on the National Park. In particular, but not limited to, the possible impact from additional traffic (the Applicant refers to the train station and bus links in Haslemere, and Petworth which are within the SDNP), ambient lighting from 121 Holiday lodges and the spa facility, together with noise generated from using the facility and associated activities.

4. Historic environment

The Parish Council is concerned at the possible impact on the historic environment of the area, with a Grade II listed building immediately adjacent to the site (Foxbridge Farm) and many other Listed Buildings being in close vicinity along the road network which will form the main routes in and out of the proposed development; particularly along Foxbridge Lane and through Plaistow and Kirdford villages.

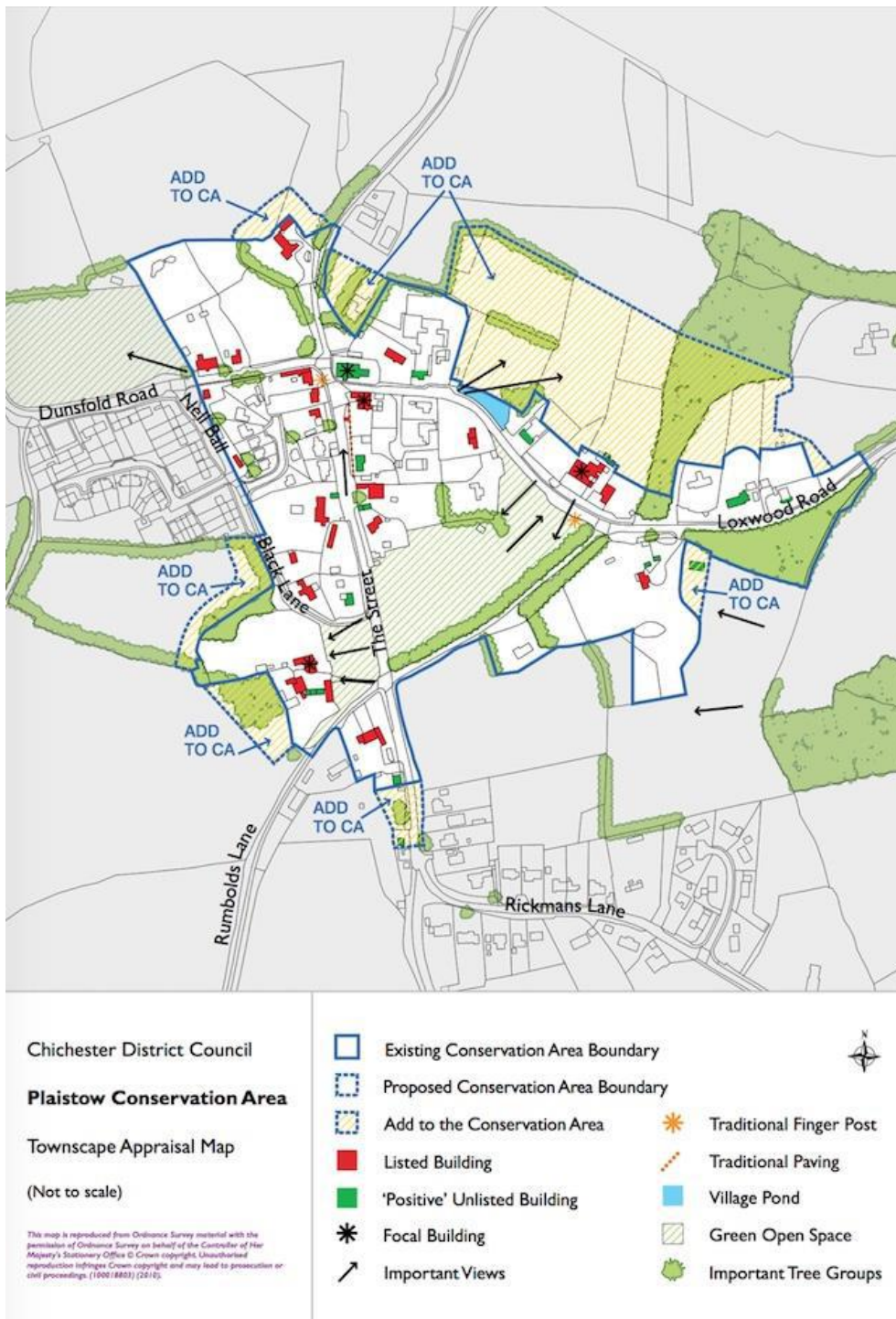
Plaistow's Conservation Area, through which the traffic would travel (especially from Haslemere and Guildford), is less than 1.5km from the site. Please refer to the below map of Plaistow's Conservation Area.

The Planning Officer will note the various comments made by the Applicant regarding access to the local public transport services, especially in Petworth and Haslemere within the SDNP:

"There are bus links in nearby Ifold and Plaistow to the surrounding towns of Horsham, Petworth, Haslemere and Guildford. Billingshurst train station, on the Southern Rail Network is 13 minutes away by car, with links to London Victoria and Gatwick airport. Haslemere train station is an 18 minute drive away and connects to London Waterloo, Guildford, Portsmouth and Southsea."

Application, 'Description of the proposed development' pg.3)

The volume of vehicles/traffic movement in the local area created by the whole development (visitors, staff, contractors, services) will have an adverse impact on the historic environment on this area. **The Parish Council respectfully requests that the EIA includes a requirement for a Landscape Assessment.** It has been demonstrated in a previous appeal decision for both the site and an adjacent site within the Parish that Landscape Assessment is an important consideration.



Map of Plaistow's Conservation Area

Characteristics of the potential impact

1. Traffic generation

The Parish Council has significant concerns regarding the increased volume of traffic the proposals will inevitably generate. The additional traffic will be detrimental to the tranquil and relatively isolated location of the site. Accessibility to Foxbridge is limited, being served by narrow country lanes with relatively poor infrastructure without pavements, or street lighting and away from the primary road network.

The Parish Council notes the Applicant's description of the Foxbridge Lane as a "a rural 60mph, 'D' classified road" (Application, 'Proposed Development plans' pg.3). Whilst this is not disputed by the Parish Council, the narrow nature of Foxbridge Lane, the pinch-point over a small bridge on a left-hand bend, limited passing space for two vehicles, dense hedgerow vegetation, no street lighting or pavements and regular use by pedestrians, children, cyclists, and horses means that the road is not a 60mph road, which can adequately service such a development safely. Additionally, the Parish's Scout Hut is situated within a few meters of the site, along Foxbridge Lane. The Scout Hut is used many evenings per week by the Beavers, Cubs, Scouts, Brownies, Guides and Explorers. There is no onsite parking for families dropping off and collecting their children; therefore, Foxbridge Lane regularly becomes congested and road safety for all users is compromised. This must be a material consideration.

The Parish Council notes that in May 2019, the Planning Inspector considered the fact that the Foxbridge site is not "close to public transport and there are no footways along Foxbridge Lane" when dismissing the appeal. Neither the location of the site, nor the location and frequency of public transport in the area have changed in the intervening three years!

Brief analysis of the Traffic and Transport element of the application

The application refers to an ATC survey in August 2017 of traffic movements in Foxbridge Lane and associated with the existing golf course and small-scale industrial unit. Golf is a highly seasonal pursuit and unfortunately the application does not state when the survey was carried out, although the Parish Council notes that the first draft was in January 2017.

Using just weekday data (for the purposes of this brief analysis of the Applicant's traffic and transport assumptions), the application quotes an average of 712 two-way movements per day in Foxbridge Lane and, of this number, 162 associated with the site. Therefore, it is assumed that the Applicant is asserting that 550 movements were not connected with the site and is therefore using 162 movements as a reasonable baseline for movements within Foxbridge Lane associated with the site, prior to any potential site development.

The Parish Council wishes to ensure that the Planning Officer is aware of the unlawful Crouchland Biogas plant and the significant vehicle movements along Foxbridge Lane associated with the site's activities. Consequently, many of traffic movements captured in the 2017 ATC survey were associated with the unlawful operations of Crouchland Biogas, which continued until after the planning appeal decision in October 2017.

The application endeavours to estimate the increase in traffic resulting from the proposed development and makes number of assumptions, such as the golf course was "not operating at its peak" during the survey. This assumption has resulted in a comparison with "other nine-hole courses using the TRICS database". This comparison has suggested 399 two-way trips, a circa 150% increase from the 162 'baseline'. The Parish Council requests that the Planning Officer does due diligence to independently verify these comparable figures.

The application suggests that the development will generate an additional 871 two-way trips per weekday but reduces this to 691 movements as a proportion are within the site and will not egress the public highway.

The Parish Council notes that within the Applicant’s public consultation material, they extol the “*array of tourist attractions, pubs and restaurant to attract visitors to the local area*”. Given that the Applicant believes that the success of the development will be in part due to its proximity to these external attractions, it is ludicrous to then suggest that visitors will not leave the site to visit Petworth House (within the SDNP), or Arundel, or “*high-quality pubs and restaurants*”, Goodwood and Fishers Farm. Such excursions will increase the vehicle movements along Foxbridge Lane and the other local road networks.

SITE LOCATION

The former Foxbridge Golf Club is a 60-acre site situated in West Sussex. The site was previously home to Foxbridge Golf Club which ceased trading in May 2019 and the site has since fallen into disuse, with no public access. Our emerging proposals present a unique opportunity to reinvent Foxbridge, so that it once again contributes positively to the local community.

Located off Foxbridge Lane, the site is easily accessible with major transport links in the nearby town of Billingshurst, providing a direct line to London. A short journey from Plaistow, Ifold and Loxwood, the site is uniquely self-contained, yet benefits from the existing amenities of these neighbouring villages.

WIDER CONTEXT

There are an array of tourist attractions, pubs and restaurants to attract visitors to the local area, including:

- Petworth House and Deer Park offer access to 700-acres of grounds to explore, as well as displaying a spectacular fine art collection.
- Arundel offers a peaceful place to wander around antique shops, art galleries and independent shops, all nestled at the feet of the stunning gothic-style Arundel Castle and Cathedral.
- There is local gastro dining in the area with a number of high-quality pubs and restaurants.
- There are also a number of vineyards close by where visitors can try delicious local wines.
- The famous Goodwood race track is just a short drive away with many events throughout the year.
- Also nearby is Fishers Farm Park with a huge selection of indoor soft play, farm animals & rides.

TRANSPORT LINKS

The site is sustainably located and benefits from the following connections:



Short walking distance to Plaistow and Ifold



Under 20 minute drive to Billingshurst & Haslemere train stations connecting Haslemere train station connecting the site to London Guildford and Portsmouth



45 minute train journey from Chichester to Billingshurst



1 hour train journey from London to Billingshurst



Existing footpath links to existing pubs and restaurants

The Parish Council requests that the Planning Officer interrogates the figures used by the Applicant to independently satisfy themselves as to how the Applicant arrived at them when considering the size/scale of the proposed development and the various elements e.g., farm shop, restaurant and bar, spar, wellness centre, accommodation and the associated number of visitor (those on holiday and day visitors of holiday guests, those who have privately purchased accommodation lodges visiting with their associated guests, staff numbers, plus external visits from the public using the site’s facilities and visits associated with maintaining the operation (deliveries / contractors etc)).

Further, the application argues that “*not all these trips would be new to the highway with a significant proportion being pass-by trips with people visiting the farm shop, restaurant or health club when passing by the site on their way home*”. This implies a significant proportion of the total traffic currently using Foxbridge Lane will use the facilities on a very regular basis. This, the Applicant argues, drops the additional weekday traffic associated with the development to just 292 movements per day for such a sizeable operation!

The Parish Council believes this assertion should be robustly and independently tested by the Planning Officer. Foxbridge Lane is a narrow, rural lane which connects Kirdford and Ifold / Plaistow. The villages share a school and local services (such as the Scout Hut). Many trips are undertaken by local families to visit friends and relatives. The assumption that on many of these perfunctory journeys, local people will be 'popping into Foxbridge' to use the *"farm shop, restaurant or health club when passing by the site on their way home"* is questionably absurd. Particularly, when the Crouchlands Farm site will also include a farm shop, both villages have well stocked, independently run villages shops and, as the Applicant themselves points out in their promotional material, the local area benefits from an *"array of tourist attractions, [including] pubs and restaurant..."* Local residents have a great many options to choose from in terms of farm shops, eateries (many of which are working exceptionally hard to retain sufficient custom to remain open), beauty treatments (due to the number of established independent operatives within the local area) and have existing loyalties and affiliations with these places. Similarly, a good number of properties within the Parish and surrounding area benefit from private pools.

Therefore, Foxbridge will not be offering a unique service to residents to justify their assertions that:

1. *"not all these trips would be new to the highway with a significant proportion being pass-by trips with people visiting the farm shop, restaurant or health club when passing by the site on their way home"* (pg. 7)
2. *"In terms of a net increase in vehicle trips on the surrounding highway network, when looking at a realistic case assessment it is considered that the development proposals would result in 292 additional two way trips on a weekday...."* (pg.7)

The Applicant acknowledges that if no account is taken for linked trips the development proposals would result in 717 additional two-way trips per weekday. Even if you accept the assumptions made by the Applicant, this represents an increase in traffic movements along Foxbridge Lane from 550 to 1,267 per day (a 130% increase).

2. Public Rights of Way (PRoW)

The Parish Council respectfully asks the Planning Officer to seek the views of WSCC's PRoW Team regarding the impact the proposed development will have on the areas PRoW. The Council has concerns regarding the impact of increased footfall on the quality and maintenance of the local PRoW network, especially as this eco-aspect of the proposal is promoted by the Applicant.

3. Cumulative effect

The Parish Council notes the following 'Screening Criteria Question' from the screening matrix document, which is asserts is directly relevant to this development:

"Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?"

The Parish Council respectfully asks the Planning Officer to consider the above detailed environmental matters alongside the recent and relevant developments within the Parish and local area. The cumulative effect of the following developments alongside the current proposals at Foxbridge is significant and detrimental to the area:

- a. 54 residential dwellings (Carla Homes) 2.5km away in Kirdford
- b. 50 residential dwellings (Thakem Homes) 2.5km away in Loxwood
- c. 1800 residential dwellings (Dunsfold Park) 5.5km away in Dunsfold
- d. Crouchlands Farm “Whole Farm Plan” 0.5km away
- e. Rickman’s Green Village proposal at Crouchlands Farm - 600 residential dwellings and Primary School 0.5km away

Conclusion

The Parish Council notes the questionably different responses from CDC’s Environmental Protection Team in relation to this application and the Crouchlands Farm site. Given the closeness of the sites to one another, they invariably share common qualities e.g., they are both situated in the same rural area (500 meters apart) and therefore their air quality, noise levels and light pollution will be almost identical (low). Consequently, it appears perverse that CDC’s Environmental Protection Team is not calling for a lighting impact assessment, air quality assessment and noise assessment as part of an EIA, as they did in relation to the Crouchlands Farm site.

The Parish Council notes the Applicant’s somewhat offensive assertion that the proposed scheme “*is only of local importance in terms of environmental effect*” (Application, ‘Conclusion’, pg 14) and strongly refutes their conclusion that “*the proposed development does not constitute EIA development for the purpose of the EIA Regulations*” (ibid).

Given the nature and scale of the proposal, its sensitive location, and environmental conditions of both the site and surrounding countryside the Parish Council asserts that the proposed development is likely to have significant effects on the environment by virtue of factors such as its nature, size, and location and does constitute EIA development for the purpose of the EIA Regulations. Therefore, it will require the submission of an Environmental Statement with any planning application.

Yours sincerely



Catherine Nutting
Clerk & RFO to Plaistow and Ifold Parish Council

Clerk & RFO: Catherine Nutting

Tel: 01403 871652 | Email: clerk@plaistowandifold.org.uk | www.plaistowandifold-pc.gov.uk