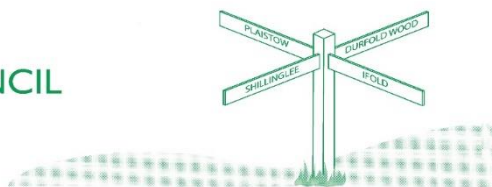


PLAISTOW AND IFOLD PARISH COUNCIL



15th September 2022

Nicola Martin
Senior Planning Officer
Chichester District Council

Sent via email: nmartin@chichester.gov.uk

Dear Ms Martin,

Re: 22/01735/FULEIA | Regeneration of Crouchlands Farm, Rickmans Lane Plaistow Billingshurst West Sussex RH14 0LE

In considering the documents submitted with this application and noting the Applicant's desire to diversify away from farming and introduce many non-agricultural business activities on the site, the Parish Council would like to consider the Applicant's evidence demonstrating the commercial viability of the proposed new activities and primary evidence that there is local demand for such commercial activity.

The Parish Council notes Appendix E of the [Chichester Local Plan \(2014 – 2029\)](#) and that it applies to Local Plan policies relevant to this application and proposed scheme¹; notably: -

- Policy 31, Caravan, and Camping Sites
- Policy 37, Accommodation for Agricultural and other Rural workers.
- Policy 46, Alterations, change of use and/or Re-use of existing buildings in the countryside

The Parish Council acknowledges that the wording of Appendix E seems to primarily relate to the loss of certain types of sites², due to a lack of commercial viability, therefore requiring applications for change of use, or redevelopment of property/land. Appendix E requires such applications to be accompanied by *“robust and credible evidence that adequate marketing has occurred in order to support the argument that the property/land is no longer required”* (E.1, pg. 276)

¹ The Applicant's proposals for the site includes glamping, change of use across the site, change of use /alteration to existing buildings and on-site dwellings for workers.

² E.g., caravan and camping sites (policy 31); or accommodation for agricultural and other rural workers (policy 37)

However, the Parish Council also acknowledges that the general criteria/guidance set out in E.1 – E.5 is referred to in relation to **proposals for** tourism and/or leisure development (E.7). E.7 states, *“In addition to the general criteria above evidence may be required to demonstrate [...] Evidence of the need for new tourist facilities to show a high demand on existing sites and justification for new sites, having regard to the quantitative and qualitative analysis of the range of tourist accommodation, including details about other local touring and permanent sites.”* (Appendix E.7, pg. 277)

The use of the words *“In addition to the general criteria above...”* clearly demonstrates that the various general marketing and evidence requirements listed in Appendix E.1 – E.5 is required to support applications for new tourism and/or leisure developments and not just to demonstrate the lack of commercial viability of such activity.

Considering the application seeks to diversify away from farming and introduce many non-agricultural business activities on the site, including new tourism and leisure developments, the Parish Council would like to consider the required marketing evidence, which supports the proposed use and demonstrates high demand and commercial viability.

Additionally, given the Applicant’s desire to diversify away from farming, the Parish Council would like to consider the *“robust and credible evidence that adequate marketing has occurred in order to support the argument that the property/land is no longer required”* for general farming purposes as the primary commercial activity of the property/land.

The Parish Council has been unable to ascertain within the submitted documents adequate primary evidence demonstrating commercial viability and/or demand for the various proposals. For example, there are no commercial reports from local agents/qualified valuers, or tenants / potential users supporting this scheme.

Likewise, the Applicant does not provide any agricultural consultant’s report to support the proposed minimal farming plans and whether they are viable on the site; for example, the growing of crops to sell in the proposed farm shop. Again, the Parish Council would have expected to see such a report within the submitted documents.

The Parish Council respectfully enquires if the above referred to commercial viability information has been submitted with the application? If not, the Parish Council respectfully asks the Local Planning Authority to request this information be provided by the Applicant in accordance with Appendix E of the Chichester Local Plan.

Plaistow and Ifold Parish Council look forward to hearing from you and receiving this information from

the Applicant for its consideration as part of the planning application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Nutting', with a small dot at the end.

Catherine Nutting
Clerk & RFO of Plaistow and Ifold Parish Council