



Plaistow and Ifold Parish Council Representations

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

June 2023

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Section 1: Parish Council Position

- 1.1 **The Parish Council OBJECTS to both applications 22/03114/FULEIA and 22/03131/OUTEIA and asks the Local Planning Authority to refuse permission for the proposed development.**
- 1.2 The applications are contrary to the policies of the Chichester District Local Plan 2014 – 2029 (CLP) and the policies of the emerging Chichester Local Plan 2021 – 2039 (eCLP). They are also contrary to a range of national policies as set out in the National Planning Policy Framework (NPPF) which are material to the determination of the application. They do not constitute sustainable development and there are significant and demonstrable reasons for them to be refused.
- 1.3 The Local Planning Authority (LPA) will be aware that in policy and practical terms these applications are both confused and confusing in their relationship to application 22/01735/FULEIA, and as a result fail to present any coherent proposal for the settlement they seek to create. It is arguable that they could and should be assessed without regard to the content of application 22/01735/FULEIA. However, if the LPA is minded to consider them as inter-related applications, then the Plaistow and Ifold Parish Council (the Parish Council) has the following representations to make.

Section 2: Nature of the Applications and the Relationship with application 22/01735/FULEIA, Whole Farm Plan

- 2.1 From the outset, the Parish Council wishes to ensure that decision makers are fully cognisant of the history of these applications. The Applicant advises that the site was ‘purposefully located outside and away from an identified settlement’, as if they had many location options for their proposals and Crouchlands Farm was objectively assessed as the best option.
- 2.2 In view of this misleading position, it is appropriate for the Parish Council to remind the decision makers that the application site is ultimately owned by the Investors who promoted the previous unlawful industrial development at the site that was subject to planning appeals, planning inquiries and enforcement actions costing the County Council, District Council, Parish Councils and ultimately taxpayers many hundreds of thousands of pounds (APP/L3815/C/15/3133236, 3133237 and 3134445).

- 2.3 The location promoted for a new settlement has not been carefully and purposely chosen for being 'located outside and away from any identified settlement' but has a purely commercial motive to recoup losses arising from investment in an unlawful use of the site for biogas production by its ultimate owner which is Prestige Alternative Finance Fund Limited (registered in the Cayman Islands).
- 2.4 The Parish Council respectfully refers to a public communication to investors in the Fund and particularly to appendix 1 of the 'Prestige Alternative Finance Impairment document', which states: - *"The Fund formed Artemis Land & Agriculture and recruited a specialist management team to create a Rural Diversification Plan for Crouchlands Farm in West Sussex..."*.
- 2.5 Whilst the Fund is entitled to promote the site, CDC is absolutely correct to reject it as unsustainable and ill conceived.
- 2.6 Both 22/03114/FULEIA and 22/03131/OUTEIA are predicated on the approval of the Applicant's separate application for the development of a range of uses on the Crouchlands Farm site submitted separately as 22/01735/FULEIA and known as the 'Whole Farm Plan' (WFP). In combination these applications represent a proposal for a substantial new settlement in the countryside to be known as 'Rickman's Garden Village' (RGV). The Applicant's planning strategy is, to say the least, unusual. They could, and should, have made a single, hybrid application for the proposed settlement with accompanying masterplan document, design code, and infrastructure proposals. These should have comprehensively set out the policy and practical basis for the establishment of such a major development. This would have been the appropriate way to proceed. The separate and unrelated alternative proposal for a standalone retail/leisure development (i.e., the WFP application) could still have been submitted as an alternative for consideration. The piecemeal approach adopted undermines any case the Applicant makes that they are genuinely driven to create a sustainable community.
- 2.7 Even if a charitable position is taken and the applications are viewed (despite their presentation) as a single proposal, the result is entirely flawed. The WFP application seeks approval for a destination leisure/retail outlet in the countryside. Its content bears no relation to the retail, employment and social components required for a substantial and, crucially, stand alone, new community with a mixed resident population. Indeed, there is no mention in the planning statement submitted with

22/01735/FULEIA that it is intended to function in this way. Even if it were approved (which it should not be) the WFP proposal is not and never could be the supporting infrastructure onto which substantial residential development could be attached. Taken together they are still completely unable to demonstrate a coherent proposition for RGV.

2.8 This is confirmed by ‘The Vision’ set out in section A, paragraph 2 (pg.3) of the Applicant’s Planning Statement submitted in support of both residential applications:

*“The proposed new **settlement** will be a high-quality, well-planned, sustainable form of development. The development will provide **up to 600 homes** (including 30% affordable homes) to the east and west of Rickman’s Lane, **focused around a new village hub providing employment, retail, leisure and education opportunities and facilities (separate planning application ref 22/01735/FULEIA).**”*

[own emphasis]

2.9 This ‘vision statement’ makes no sense. Application 22/01735/FULEIA is not an application for a “*a new village hub*”. It is nowhere else described in that way including anywhere in its own supporting Planning Statement. It does not represent infrastructure appropriate to support new residential development, let alone a new settlement. Neither residential application contains any proposals which would remedy this, nor takes a proper master-planning approach. The residential development proposed relies entirely on the content of the WFP application, but this is wholly unsuited to the needs of the proposed community – not surprisingly given that it is an application for something else entirely.

2.10 To make matters worse, the WFP prays in aid aspects of the RGV applications to realise its own, alleged, sustainability credentials.

2.11 For example, within the recently submitted ‘[Whole Farm Plan Framework Travel Plan Addendum](#)’, the Applicant sets out the envisaged use of the proposed RGV fare-free bus service for future employees and users of the WFP. This is submitted as a ‘measure to promote public transport use’, no doubt to try and mitigate the otherwise inevitable and unavoidable dependency on private cars to access the site, owing to its highly rural unsustainable location; and a need to demonstrate how the WFP complies with the CLP Policies 8, 39 and NPPF para 110.

“As part of the proposed Rickman’s Green Village development [...] a fare-free bus service is proposed to serve the site. 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 WFP, as well as all existing and future residents of RGV and surrounding areas.

[own emphasis]

[‘Measures to Promote Public Transport Use’, para 5.3.1, pg.12]

- 2.12 By adopting this planning strategy, the Applicant has succeeded only in demonstrating that the applications, even when considered together, fail completely to make the case that they would create a sustainable community which would have an acceptable impact in accordance with national and local policy. This fatally undermines the applications for residential development which should be refused. The application for the WFP should also be refused on the basis of the description of development (i.e., as an out-of-town retail/leisure destination in the countryside).

Section 3: Observations on the WFP Planning Application in relation to Residential Development Proposals

- 3.1 As stated, if the LPA accepts the Applicant’s evidence and assertions that all three applications are interdependent and considers them together, the content and deliverability of the WFP application becomes relevant when assessing the residential applications (22/03114/FULEIA and 22/03131/OUTEIA).
- 3.2 In the absence of the WFP, the applications would represent a residential housing estate developed on a green-field site in the countryside, outside a settlement boundary in ‘the rest of the plan area’ as defined by the CLP and with no supporting infrastructure. As such they could be refused without delay on the basis of local and national policy, because they would significantly and demonstrably represent development of an unsustainable nature.
- 3.3 The association of the applications with the proposed WFP does not improve the case. Leaving aside the argument that the WFP should be considered on its own merits and refused, it does not, even if approved, represent the infrastructure provision required for a ‘new village hub’ or assist in the creation of a sustainable community. To submit

two large scale residential applications which pray in aid that project to support their sustainability is, frankly, odd, as a planning strategy. This is absolutely not the proper way for such a proposal to come forward, and is, in itself, a strong reason for refusal of the residential applications.

- 3.4 The Parish Council's comments on the merits of the WFP are set out in its detailed response to 22/01735/FULEIA. It is described as an out-of-town leisure/retail proposal intended as a large scale farm diversification project to provide commercial revenue for the farm business. Notwithstanding the recent amendments to the WFP application, (notably the removal of the equestrian centre) the Parish Council continues to fully endorse and rely upon its extensive objections submitted in October 2022.
- 3.5 It is not the intention of the Parish Council to re-state in full its objections to the WFP here, but the representations contained in this document should be read in conjunction with its position as outlined in: -
- [Objection regarding Traffic](#), submitted 3rd October 2022
 - [Objection regarding Water Neutrality](#), submitted 5th October 2022
 - [Objection regarding Landscape](#), submitted 3rd October 2022
 - [Objection regarding Policy and appeal case precedents](#), submitted 10th October 2022
- 3.6 The WFP application – being a commercial / non-residential application - will not be out of date for decision making unless it can be shown that policies in relation to employment are inconsistent with the evidence base or national policy (NPPF paragraph 11). None of the arguments subsequently made in relation to the LPA's five-year housing land supply have any weight or substance in relation to the application.
- 3.7 CLP Policies 1, 2, 8, 39 and 45 are not out of date for the purposes of determining the WFP application. It is clearly contrary to those policies and on that basis the application should be refused.
- 3.8 Recently dismissed planning appeals regarding much smaller commercial / non-residential proposals, demonstrate that these policies continue to be consistent with the NPPF and have been robustly applied by inspectors in decision making. In particular, the Parish Council draws attention to the recent application of CLP policies 1, 2 and 45 in decisions in February 2023 and May 2023, submitted alongside this document for ease of reference: -

- (1) J Reid BA(Hons) BArch (Hons) RIBA | Appeal Ref: APP/L3815/W/22/3302155, paragraphs 3 and 4, pg. 1 | Goose Cottage, Durbans Road, Wisborough Green RH14 0DG | 13 February 2023

“LP Policy 1 reflects the presumption in favour of sustainable development in the National Planning Policy Framework (Framework). In line with LP Policy 1, LP Policy 2 sets out the settlement hierarchy for the District, and it explains that outside Chichester city and the designated Settlement Hubs, the Service Villages will be the focus for new development and facilities. In the Rest of the Plan Area outside the Settlement Boundaries of the settlements listed in LP Policy 2, development is restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with LP Policies 45 to 46.

LP Policy 45 states that within the countryside, outside Settlement Boundaries, development will be granted where it requires a countryside location and meets essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements.”

- (2) Richard S Jones BA(Hons), BTP, MRTPI | Appeal A Ref: APP/L3815/C/21/3283324 / Appeal B Ref: APP/L3815/C/21/3283325, paragraph 47, pg. 6 | Land at Manor Copse Farm, Oak Lane, Shillinglee, Plaistow, West Sussex GU8 4SQ | 17 May 2023

“LP Policy 2 identifies the locations where sustainable development will be accommodated, which in terms of scale, function, and character support the role of identified settlements. Development outside the settlements, [...] is restricted to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45 and 46. LP Policy 45 states that within the countryside, outside settlement boundaries, development will be granted where it requires a countryside location and meets the essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements.”

- 3.9 Both these dismissed appeals sought consent for commercial buildings on sites outside a settlement boundary as designated by the CLP and constituting development in the countryside. Since Crouchlands Farm is also unequivocally outside any settlement boundary and in a countryside setting, these decisions represent strong support for the consistent application of the policies.

3.10 In relation to Goose Cottage, the proposal was deemed contrary to Policy 45 of the CLP, as there was no evidence to show that the proposal would need to be located in the countryside, or that it would meet an essential, small scale, and local need. Similarly, the appeal was dismissed due to its failure to meet the requirements of Policies 8 and 39 *“...several office workers would reasonably be expected to commute to and from existing settlements on weekdays by car. The trips of visitors, and for servicing and deliveries, would also be likely to be made by private or commercial vehicles”* (para 10).

[Back to para 3.20](#)

3.11 In conclusion, the Inspector determined:

“...I consider that the proposed development would not be reasonably accessible for workers and visitors. It would be contrary to LP Policies 1 and 2, LP Policy 8 which aims for development to be well located to minimise the need for travel and to encourage the use of sustainable transport modes, LP Policy 39 which seeks for development to be located to minimise additional traffic generation, LP Policy 45, [...] It would also be contrary to the Framework which aims to promote sustainable transport modes and to actively manage patterns of growth” (para 13).

“I have found that the proposed development would be contrary to the Development Plan when taken as a whole” (para 18).

3.12 Appeals APP/L3815/C/21/3283324 and APP/L3815/C/21/3283325 were made against an enforcement notice to remove a sectional shed / pottery studio built without planning permission at Land at Manor Copse Farm, Oak Lane, Shillinglee, Plaistow, GU8 4SQ contrary to LP Policies 1, 2 and 45 (among others). The appeals were dismissed, and the enforcement notice upheld.

3.13 The main issue was whether the site was an appropriate location for the building, having regard to relevant CLP policies and the NPPF. At paragraph 48, the Inspector determined: -

“The appellant has not sought to show, and I do not find, that the building (and its use as a pottery studio) requires a countryside location, or that its purpose meets an essential local rural need or supports rural diversification. The

development is therefore contrary to LP Policies 2 and 45 and to LP Policies 1, 25, and 48 and to the NPPF as a whole.”

- 3.14 Given these appeal precedents regarding the application of CLP policies in the north of the plan area there is no reason why the proposals outlined by the WFP should not be subject to the same rigorous application of these policies.
- 3.15 Additionally, the Parish Council refers to Appendix A, which sets out other relevant dismissed appeals, which must be considered and applied in the determination of the WFP application (22/01735/FULEIA).
- 3.16 The Parish Council notes the Applicant’s suggestion that it can somehow create ‘essential’ and/or ‘local’ need by being allowed to build a large number of houses on the farm site. This applies the logic that if the RGV applications are allowed, then the resulting residents will have a local/essential need for the services provided by the WFP e.g., a ‘rural enterprise centre’, ‘rural food and retail centre’ and ‘glamping site’. Such an argument is nonsense. Policy 45 must be applied to the current situation – evidenced local, small-scale need as it currently exists – not a hypothetical proposal which is itself contrary to local and national policy.
- 3.17 Even were it to be accepted that this argument could engage (which it cannot), *were* the two RGV applications to be determined successfully, the residents of the new settlement would not be frequent users of a ‘rural enterprise centre’, ‘rural food and retail centre’ and ‘glamping site’ to satisfy their need for education, retail, and local services.
- 3.18 Equally pertinent is the fact that there already exists plenty of convenience stores/farm shops in the area. Current residents, and any future RGV residents, do not have an unmet ‘essential need’ for local convenience retailers. The villages of Plaistow, Ifold and Kirdford all have thriving community stores. Existing residents, who live on the edges of these villages, must travel approximately 1 mile to access their respective village shops: -
- (a) Glasshouse Lane, Kirdford - approximately 1 mile (20-minute walk)
 - (b) Ifold Bridge Lane, Ifold - approximately 1.3 miles (27-minute walk)
 - (c) Dunsfold Road, Plaistow - approximately 1 mile (20-minute walk)
- 3.19 Plaistow Stores is approximately 1.3 miles away from the Applicant’s site. Consequently, *were* RGV to be developed, residents’ essential local need for a convenience store could

be met *“immediately adjacent to the existing settlements”* in Plaistow – the development of a ‘rural food and retail centre’ to meet either an existing unmet essential need, or a potential unmet essential need (*were* RGV to be developed) cannot be justified on these irrefutable facts.

- 3.20 It is important at this juncture that the reader cross-reference with paragraphs [7.9](#), [7.19](#) and [7.20](#) below, regarding the Department for Transport’s statistics on travel habits in rural areas; the requirements of pedestrians; and the existing unwillingness of current residents to walk/cycle to the (limited) local services, due to safety concerns on the parish roads, which would be exacerbated by introducing over 1,000 more private cars into the area were RGV to be built. The Parish Council can reliably assert that RGV residents would follow the existing behaviour patterns of current parish residents and drive to the existing - all-be-them limited - local facilities.
- 3.21 Therefore, the Applicant’s proposals fall down twice; firstly a ‘rural food and retail centre’ does not meet Policy 45 requirements as meeting an essential, small scale, and local need; and secondly, *were* RGV to be developed and new residents began using local shops, it would contravene Policies 8 and 39 by introducing an inexcusable number of additional private vehicle journeys. This latter point is nicely illustrated by the Planning Inspector within the Goose Cottage appeal decision (February 2023) ([para 3.10](#) above). Of additional note, the Goose Cottage site is 700m from the centre of Wisborough Green. The Inspector described the site as being *“well away from the village of Wisborough Green”* (para 5) and expected users of the site to drive into Wisborough Green village to access the village shop. Crouchlands Farm is a further distance away from either Plaistow or Ifold; therefore, it cannot be doubted that RGV residents would drive private vehicles into Plaistow/Ifold and Kirdford. This further undermines the Applicant’s ‘15-minute community’ discussed at paragraph 7.15 onwards below.
- 3.22 Once again, the Parish Council highlights the fundamental flaw in the Applicant’s planning strategy. The WFP application is for a farm diversification project to operate with a sufficiently wide catchment to provide significant commercial revenues as set out in the description of development, and it must be considered on that basis. It cannot be determined on the basis that it might be something else entirely i.e., the centre of a new village. The facilities proposed are entirely unsuited to that function and the planning arguments which support them cannot and do not also support some alternative strategic role in relation to a residential development.

Section 4: Policy Considerations including the Application of the NPPF and the Local Plan Review Process to Residential Development

- 4.1 The Parish Council understands and appreciates that the current Chichester Local Plan (CLP) was made over 5 years ago and that the LPA cannot provide a robust demonstration of a 5-year housing land supply. In these circumstances, Paragraph 11 of the NPPF engages and *“decisions should apply a presumption in favour of sustainable development”* unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 4.2 The Parish Council notes the comments that the Applicant makes regarding the LPA’s Interim Position Statement for Housing (IPSH) issued in 2020. The Applicant’s criticisms of the IPSH are based on setting up a ‘straw man’ target. The LPA has never suggested that the statement is anything other than a material consideration, or that it will have other than limited weight in decision making. Nevertheless, it demonstrates that the LPA has taken its 5-year housing land position seriously and has taken steps to promote a sustainable response rather than one based on wholly speculative applications. The position has now been given some additional weight by the submission of the eCLP for examination which includes a carefully formulated approach to meeting the maximum possible element of the local housing need without including any development at Crouchlands Farm.
- 4.3 Despite what the Applicant says, it is well established law that Development Plan policies are still the starting point for the determination of residential planning applications, even when a 5-year housing land supply does not exist; or the Plan is more than 5 years old. They may be given weight according to the extent that they are still supported by the evidence base and are consistent with national policy as set out in the NPPF. The Parish Council respectfully asserts that the inclusion of the word ‘sustainable’ in Paragraph 11 of the NPPF is of paramount importance; there is not an unfettered presumption in favour of *any* development and policies within the NPPF are of particular importance in considering an application(s) in these circumstances.
- 4.4 The relevant question is therefore what support the NPPF provides to the CLP such that its policies should still carry weight in determining these applications. The answer is that the NPPF fully supports the CLP policies in opposing inappropriate development in the countryside. Paragraph 73 of the NPPF specifically stands against the Applicant’s

argument that ‘any location’ for larger scale developments such as the one proposed at Crouchlands Farm will be suitable if there is a shortfall in housing supply.

- 4.5 Paragraph 73 requires that larger scale developments should come forward as part of strategic policy making (i.e., through allocations in a local plan) and should be:

well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes) ...

[own emphasis]

- 4.6 Specifically, paragraph 73(b) states that such sites need to: -

...ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

- 4.7 In addition, Paragraph 73 requires strategic policy-making authorities to: -

“...identify suitable locations for such [large-scale] development where this can help to meet identified needs in a sustainable way.”

- 4.8 The LPA undertook such a review for the purposes of the current CLP and did not include an allocation for development at Crouchlands Farm. It has very recently undertaken this exercise again for the purposes of the eCLP, which has now been submitted for examination. In both cases policies are based on a comprehensive assessment of the needs of the district having regard to national policy and whether there is potential for increased growth in the northern parishes to meet housing need. These reviews were accompanied by a Sustainability Appraisal (SA) in accordance with Paragraph 32 of the NPPF.

- 4.9 The SA for the eCLP represents the most up-to-date assessment/evidence for development potential across the district, including the group of parishes to the north of the South Downs National Park which have a unique rural character. The LPA expressly considered and tested the Crouchlands Farm site and the Applicant’s proposals for a new settlement to be included as a strategic development within the eCLP. Appraisal of the evidence and planning policy considerations, including those of

the NPPF, led to the conclusion that the site is unsustainable and should not be included.

4.10 The Parish Council particularly draws the decision-makers' attention to Chapter 3 and paragraphs 3.21 – 3.29 and Policy S1: Spatial Development Strategy of the eCLP, which is supported by up to date evidence: -

- The site is in the North of the Plan area which is *“predominantly rural with few sizeable settlements, characterised by undulating countryside with a high proportion of woodland, typical of the Low Weald landscape. Conserving the rural character of the area, with its high-quality landscape and environment, is a key objective”* (para 3.22, pg. 36).
- *“Accessibility to services and facilities is a particular issue for this area, with local residents having to travel significant distances for many facilities”* (para 3.23, pg. 37).
- *“Previously, given the present constraints on development in the area, the Local Plan has provided for only limited growth, focused on enabling these communities to continue to sustain their local facilities and contribute towards meeting locally generated housing needs, as well as support for the rural economy, in line with the settlement hierarchy. However, due to the constraints on the A27 in the south of the plan area, this Plan has had to provide a moderate level of growth in the north to help to make up the overall shortfall of dwellings. Higher levels of growth were considered at Kirdford, Wisborough Green and Plaistow and Ifold, but ruled out due to the need to conserve the rural character of the area and its high-quality landscape and minimise the impact on the historic environment”* (para 3.24, pg. 37).

[own emphasis]

- *“The following locations, which are all service villages have been identified as being capable of accommodating lower growth to come forward through the neighbourhood planning process: • Kirdford – 50 dwellings • Wisborough Green – 75 dwellings • Plaistow and Ifold – 25 dwellings”* (para 3.25, pg. 37).
- *“In the rest of plan area, the Local Plan aims to continue to protect the countryside, but also recognises the social and economic needs of rural communities. As such, new development in the countryside will be generally*

limited to the appropriate diversification of traditional rural industries; small-scale housing that addresses local needs, and replacement dwellings/buildings (para 3.28, pg. 37).

4.11 The Applicant was unable to convince the LPA that this proposal should be included in the emerging local plan and the evidence on which that evaluation was based has not changed. Nothing in the preparation of the eCLP has cast retrospective doubt on the policies in the CLP relevant to determining these applications. It would be entirely appropriate to refuse the applications and there is no need to be concerned about any 'prematurity' argument – the applications are contrary to both current and emerging policy.

4.12 In relation to the eCLP, Paragraph 48 of the NPPF makes clear that the decision maker can: -

“give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given)

....

c) the degree of consistency of the relevant policies in the emerging plan to [the NPPF] (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

4.13 The up-to-date evidence relating to infrastructure, design, landscape impact and transport all indicate that the adverse impacts which would inevitably arise from a new settlement on the site would significantly and demonstrably outweigh any benefits of delivering additional housing even in the absence of a 5 year housing land supply. The NPPF's overarching priority is to achieve additional housing only if it constitutes sustainable development. Where the evidence against such a conclusion is compelling then permission for speculative development should be refused. Granting consent for these applications would be contrary to the policies of the CLP, the eCLP **and** paragraph 73 of the NPPF.

4.14 **The NPPF gives full support for these two planning applications to be considered against the policies of the adopted Development Plan and for weight to be attached to those of the emerging eCLP. In preparing the eCLP the LPA has already considered the principle of development at Crouchlands Farm and made an evidence-based**

decision to reject the option to allocate land for this purpose. It has the full support of the NPPF in doing so and for refusing these speculative applications which seek to undermine the principle of a ‘plan led’ system.

Section 5: Place Making and Sustainable Development

- 5.1 The Parish Council has set out in the previous section that there are fundamental policy objections to the provision of a speculative new development in the countryside at Crouchlands Farm. Those objections would stand against any such proposal even if it were well considered and addressed ‘place-making’ issues in an exemplary manner. **However, in addition to its policy failings, the RGV proposal is fundamentally flawed in its detail and fails to address the most basic of place-making considerations or infrastructure provision.** As a proposed community it could not function sustainably and would not serve the needs of its residents. The shortcomings are inherent in the concept, but they are magnified by the inadequate attention paid to them by the Applicant.
- 5.2 Paragraph 8 of the NPPF sets out how sustainability is achieved, by adhering to the three *“overarching objectives, which are interdependent and need to be pursued in mutually supportive ways”*; namely: -
- an ‘economic objective’;
 - a ‘social objective’; and
 - an ‘environmental objective’.
- 5.3 Although individual applications are not determined directly on the basis of these principles, they help to define the nature of truly sustainable development which underpins the NPPF. To be considered acceptable, a proposal for a wholly new settlement **must demonstrate that it is able fulfil all these objectives.** Analysis of the ‘end result’ of these applications – in other words, considering what RGV would be like to live in were it built out as the Applicant suggests – makes it obvious that the proposal fails on all counts. It would, in simple terms, be exactly the kind of place that government policy and common sense tells us we should not build.

Section 6: Employment and Economic Issues

- 6.1 To be sustainable, significant scale new housing provision requires an economic rationale and justification. This provides the essential relationship between the opportunity to live in a particular area and need for wider sustainable economic development.
- 6.2 In preparing the eCLP, the LPA has correctly reached the conclusion that additional development within the northern parishes of the district, over and above the provision made for individual villages, cannot be supported either by the existing rural economy, or through the delivery of appropriate economic activity. Chichester District Council (CDC) states at page 37 of the Sustainability Appraisal supporting the eCLP: -

“...there is little evidence to provide an economic argument for retail and employment development in this [northeast plan] area”.

- 6.3 The area is not suitable for such growth because it lacks the infrastructure (including a genuine choice of transport modes) which would support significant new employment, and because of the sensitivity of the landscape and ecology. The level of additional employment development and therefore strategic infrastructure required to justify a new settlement at Crouchlands Farm would conflict with the CLP, eCLP and the NPPF as the Parish Council has demonstrated. Nor would it be commercially viable to provide. It would conflict with the objective of protecting and enhancing the natural environment and protecting and enhancing the area’s heritage and character – being within the Northern Low Weald, recognised by CDC’s [Landscape Capacity Study, March 2019](#) as having a low capacity to accommodate significant development, and in close proximity to the South Downs National Park.
- 6.4 There is therefore no wider employment or economic development led case for this scale of development. As pointed out, it is entirely fallacious for the Applicant to argue that these proposals for housing development are justified by the proposals for the WFP. Firstly, because that form of argument is obviously contrary to the requirements of the NPPF and common sense. It is simply wrong to attempt to justify one unacceptable proposal by citing in its support a different unacceptable proposal. Secondly, because the content of the WFP application is nowhere shown to provide for the nature of the employment residents are likely to require. It might well be the case that filling some vacancies created by the WFP would be achieved more easily if up to 600 houses were built alongside, but if so that simply demonstrates that the WFP is inherently unsustainable and unnecessary in a rural area.

- 6.5 The range of employment opportunities proposed by the WFP in its ‘rural enterprise centre’, ‘rural food and retail centre’, ‘glamping site’ and limited farming activity are unrelated to typical employment needs in the district. They are either highly specialised (e.g., ironworker, microbrewers, bakers, and jewellers¹) or low-level hospitality or service related. They would be irrelevant to the majority of employment needs of a population of at least 1,400 people (600 homes at an average occupancy rate of 2.3 people).
- 6.6 As a result, there would be an inevitable migration of RGV residents by car to larger centres such as Godalming, Guildford, and Chichester to seek out employment / public transport to London. CDC’s assessment is clearly correct in this regard: -

“..it is difficult to suggest that higher housing growth would lead to significant benefits in terms of supporting any existing employment areas / companies locally or the rural economy in the local area²”.

- 6.7 Regardless of whether Plan and/or decision makers look ahead either 15 or 30 years, it is highly unlikely that the area will provide the employment infrastructure required to support development of this scale. Any such proposal could only be arrived at as a strategic policy in a local plan, following substantial evidence gathering, assessment and consultation as set out in para 22 of the NPPF: -

“Where larger scale developments such as new settlements [...] form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

Section 7: Travel and Transport Issues

- 7.1 Paragraph 105 of the NPPF states: -

¹ 22/01735/FULEIA - Planning Statement pg., 28 | Operational Statement pg., 8 | Transport Statement pg., 8.3.4

² Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

"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"³

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"⁴ and

"the majority of existing employment and business space is focused around Chichester City and the A27 corridor..."⁵

Public Transport

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

³ 22/03131/OUTEIA | TRANSPORT ASSESSMENT-5103532, 4.2 Site Location, 2nd paragraph

⁴ Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.3, pg., 2

⁵ Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.8, pg., 3

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"*⁶

and

*"Bus services in rural areas tend not to be well used"*⁷.

- 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"*⁸

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

⁶ Proposed Bus Service Technical Note; Transport Assessment Annex C Pg 10

⁷ Proposed Bus Service Technical Note; Transport Assessment Annex C Pg 11

⁸22/03131/OUTEIA | TRANSPORTATION ASSESSMENT, ANNEX C, BUS SERVICE-5154224: 2.1 General Considerations

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.

[Back to para 3.20](#)

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”⁹

- 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.¹⁰

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.

⁹ 22/03131/OUTEIA | TRANSPORT ASSESSMENT-5103532: 2.2 Rural 15-minute Community

¹⁰ 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 roads¹¹. 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.

[Back to para 3.20](#)

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....”¹²

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: -

¹¹ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 14

¹² 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.”¹³

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: -

¹³ 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”¹⁴.

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”¹⁵.

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”¹⁶*. 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.

¹⁴ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

¹⁵ Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.7, pg., 3

¹⁶ 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”¹⁷

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

¹⁷ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 35

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: -

“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.”¹⁸

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

¹⁸ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

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.*¹⁹

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

¹⁹ Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 16

are panoramic, mid and distant views, particularly towards the south and south-east from PRowS 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 Nell ball Farm Para A12	22.03.16	Retention of an existing mobile home	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 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 Sparrwood 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/I3815/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.