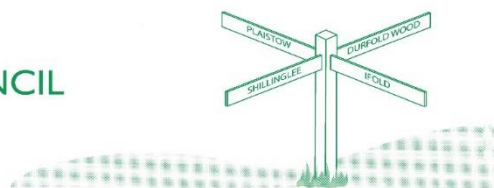


PLAISTOW AND IFOLD PARISH COUNCIL



Plaistow and Ifold Parish Council Representations 22/02346/OUT

Foxbridge Golf Course proposed re-development for Leisure village | Foxbridge Golf Club, Foxbridge Lane, Plaistow, West Sussex, RH14 0LB

November 2022

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1. Introduction

- 1.1. These representations provide a response, on behalf of Plaistow and Ifold Parish Council, to the outline planning application 22/02346/OUT.
- 1.2. The representations identify the relevant planning history for the site, the statutory planning policy and area constraints that are key considerations in determining the application. This is followed by conclusions and a recommendation.
- 1.3. This objection only raises the Parish Council's fundamental concerns and does not aim to cover all concerns, as it is not possible to comment in detail and with complete accuracy at this outline stage. Instead, the Parish Council's objection deals with the key aspects of the proposal, as follows:
 - Size and scale in the location
 - Effect on rural character and appearance of the countryside
 - Effect on tranquillity
 - Absence of evidence of Local need.
 - Absence of evidence for essential need
 - Justification for the location i.e. in a rural location outside of the settlement boundary
 - Not sustainable development and tourism in relation to location and reliance on private cars for access.
 - Impact on existing highway network and highway safety
 - Impact on local amenity
- 1.4. The representations will also outline several other issues with this application including a lack of coherence and cross-referencing between reports, and decisions based on out-of-date data that fails to truthfully reflect the current needs of the local area.

2. The Planning Application

- 2.1. The outline application (**22/02346/OUT**) proposes a wellbeing and leisure development comprising up to 121 holiday units; the construction of a spa with accommodation of up to 50 bedrooms; the conversion of the former clubhouse into a restaurant and farm shop; the formation of a new vehicular access from Foxbridge Lane, new internal roads, footpaths, cycle routes and car parking areas; the construction of a concierge building and new hard and soft landscaping, including the formation of new ponds. All matters reserved except for means of access.

- 2.2. The application site is located at Foxbridge Golf Club, Foxbridge Lane, Plaistow, West Sussex, RH14 0LB.

3. Pre-Application

- 3.1. On the 14th of September 2022, a pre-application (**20/02097/PRESM**) was submitted for 40 holiday homes together with a farm shop, restaurant and bar, kitchen garden, a wellness centre, a farmyard/petting zoo and outdoor pursuit centre, set within a re-landscaped site along with ecological, swimming and fishing ponds, ecological parks and nature trails.
- 3.2. Chichester District Council (CDC) presented a range of issues with the pre-application that future submissions would have to overcome. The following paragraphs will summarise the pre-application issues that have not been sufficiently addressed in the applicant's proposal, before discussing these points in more detail later in the representation.

Design and Impact on Visual Amenity

- 3.3. The Local Planning Authority queried the scale of the development, with regards to the number of lodges proposed. The Local Planning Authority would need further clarification / justification with regards to the scale of the development. The submitted proposal fails to demonstrate that the development requires a rural location and cannot be accommodated elsewhere (i.e. closer to a settlement boundary). Furthermore, the proposal would raise concern regarding the spread of built form within the countryside location. The submitted plans indicate that the proposal would spread across the entire application site.
- 3.4. The applicant's proposal fails to sufficiently justify and clarify the scale of the development, fails to demonstrate that the development requires a rural location and cannot be accommodated elsewhere (i.e. closer to a settlement boundary) and fails to address the concern regarding the spread of built form within the countryside location and spread across the entire application site.

Residential Amenity

- 3.5. The Local Planning Authority stated that impact on neighbouring properties would need to be fully assessed at application stage.
- 3.6. The applicant fails to fully consider the impact on neighbouring properties, especially the impact on the Foxbridge Farhouse, the closest Grade II Listed building to the applicant's site. The applicant fails to identify the full historic relevance of the building and its historic and current setting. It then fails to fully assess the impact of the proposed scheme on the building.

Ecology and Biodiversity

- 3.7. Due to the size and location of the development, CDC recommend that an extended phase one habitat survey is undertaken by a trained ecologist to determine the

presence of protected species within the site and the impact a development would have on the surrounding environment. CDC require that enhancements to improve biodiversity across the site are incorporated into any future planning application and these should be discussed within the ecological surveys and shown within the landscaping plans.

- 3.8. The applicant has failed to sufficiently indicate or specify biodiversity enhancements in the Landscaping Parameter Plan as recommended. The Landscaping Parameter Plan only shows potential new 'Green Infrastructure' and 'Ecology/Fishing Ponds', without considering the biodiversity enhancement strategies that are suggested in the Ecological Appraisal. The Ecological Appraisal fails to comment or critique on the applicant's proposed biodiversity improvements on the site, contrary to the pre-application requirements.
- 3.9. Further comments on Ecology and Biodiversity can be found in the Parish Councils Landscape Objection submitted on the 18th of November 2022.

Sustainable Design and construction

- 3.10. CDC state that the proposal must align with Policy 40 of the Chichester Local Plan relating to 'Sustainable Design and Construction'. This requires the developer to demonstrate that all the criteria have been considered; and, if not achievable, the application would require the relevant evidence as to why it is not being proposed.
- 3.11. The applicant's proposal fails to align with Policy 40 of the Chichester Local Plan relating to protecting the historic and landscape character, being sympathetic and sensitive to the local character and identity of the area, and reducing the impacts associated with traffic and pollution.

Summary

- 3.1. The application should be refused on the grounds that the pre-application issues were not addressed in this proposal. The applicant's outline application is for a development far larger in scale than 40 units, despite the Local Planning Authority raising concerns around the large scale of the pre-application. The issue outlined above will be exacerbated due to the increased size and scale of the application compared to the pre-application. The above issues are discussed in more detail from section 6 onwards in this representation.

4. Planning History

- 4.1. There have been several refused Planning Applications and dismissed Planning Appeals on and/or close to the applicant's site.
- 4.2. These refused applications/dismissed planning appeals relating to both the application site and sites in close proximity to the application site must be the starting point for consideration of any further applications.

- 4.3. Given that in every appeal one of the main issues for dismissal was the effect that even minor development (in comparison to the current proposal) would have on the character and appearance of the surrounding rural landscape, it would be difficult to understand how 121 dwellings and a 50-bed Hotel could be considered acceptable.
- 4.4. Likewise, the pending planning application at Crouchlands Farm (**22/01735/FULEIA**) must be a material consideration. The application is for the regeneration of Crouchlands Farm, comprising demolition of selected buildings, extension, refurbishment and remodelling of selected buildings and the erection of new buildings to provide up to a total of 17,169m² comprising the existing farm hub, a rural enterprise centre, **a rural food and retail centre**, an equestrian centre, and a **glamping site**. This site is located 400m from the Foxbridge application site. This application was received on the 27th of June 2022 and is pending consideration. Some aspects of this pending application are in direct competition to the current application (glamping and farm shop) and therefore cannot be overlooked/dismissed within the current determination of this application.
- 4.5. The purpose of this section is to draw the Planning Officer's attention to relevant dismissed planning appeals, which will be further referred to within the body of this document. The following dismissed appeals are listed in their proximity to the applicant site. The closer they are to the applicant site, the more relevance they have in terms of harm.

Relevant dismissed Planning Appeals

- 4.6. Dismissed Appeal (**APP/L3815/W/18/3206819**) for the construction of 10 dwellings and vehicular access to replace **the existing Golf Club**, which was rejected on the 9th of May 2019. 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. The Planning Inspector also highlighted that the development would be heavily reliant on private cars and as such would not amount to sustainable development.
- 4.7. Dismissed Appeal (**APP/L3815/W/15/3129444**) to demolish Industrial buildings and erect three dwelling houses, located on Little Springfield Farm, **150m** from the application site. The appeal was dismissed on the 1st of March 2016 due to issues related to whether the development would be sustainable regarding 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.

- 4.8. Dismissed Appeal (**APP/I3815/W/18/3206331**) for to the erection of single replacement dwelling, located **300m** from the application site. This appeal was dismissed on the 17th of January 2022 considering 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.
- 4.9. Dismissed Appeal (**APP/L3815/C/15/3133236**) on Crouchlands Farm, **500m** from the application site. This appeal was dismissed on the 10th of October 2017 considering issues related to Highways safety, living conditions of nearby residents and the rural character of the area. The roads around Crouchlands Farm are narrow country lanes that raised safety concerns regarding road users meeting lorries and no pavement to protect pedestrians, cyclists, or horse riders. The Inspector further noted that in rural situations the impact on tranquillity, increased levels of 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.
- 4.10. Dismissed Appeal (**APP/L3815/W/16/3150857**) for the erection of a wood store and garden store on land adjacent to Hardnips Barn, located **1000m** from the application site. This appeal was dismissed on the 10th of October 2016 due 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 featuring a hitherto largely underdeveloped rural surrounding 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 because 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.
- 4.11. Dismissed Appeal (**APP/L3815/W/15/3134837**) for the retention of an existing mobile home at Nell Ball Farm, located **2,200m** from the application site. This appeal was dismissed on 22nd of March 2016 due to the visual impact of the development on the character and appearance of the surrounding rural landscape. The Planning Inspector 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.

- 4.12. Dismissed Appeal (**APP/L3815/W/20/327113**) for the proposed erection of a Stable Barn and 25 X 50m Ménage at **Sparrow Farm**, located **2,400m** from the application site. The appeal was dismissed on the 19th of May 2022 due to 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 areas 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 Policy 45, 48 and 55 of the Chichester Local Plan.
- 4.13. Dismissed Appeal (**APP/L3815/W/15/3141476**) for a change of use to a Club for Fitness Training, Yoga, Spiritual Healing and Wellbeing at The Coach House, located **6,115m** from the application site. This appeal was dismissed on the 25th of May 2016. The main issue noted was the effect of the proposal of the character and appearance of the Countryside having regard to tranquillity and nearby Public Rights of Way and 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. It was 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 Chichester Local Plan.

5. Planning Policy Context

National Planning Context

5.1. The relevant planning development framework for planning application 22/02346/OUT is as follows:

- National Planning Policy Framework (2021)

Local Policy Context

5.2. The development plan for Plaistow and Ifold is as follows:

- Chichester Local Plan 2014-2029

6. Development in the Countryside

Policy 45 of the Chichester Local Plan states that development in the Countryside requires a countryside location and must meet:

- local need, that cannot be met within or immediately adjacent to existing settlements;
- essential need;
- small scale;
- the scale must have minimal impact on the landscape and rural character of the area. e) Local/ Small scale Farm shops would sell goods that have predominantly been produced on the Farm; and
- there is an objective of achieving a sustainable Countryside.

6.1. Regarding Policy 45 (a) of the Chichester Local Plan, there is no local need for holiday homes or hotel rooms. No evidence has been provided of any local need, that cannot be met within or immediately adjacent to existing settlements.

6.2. Regarding Policy 45 (b) of the Chichester Local Plan, the Visitor Accommodation Needs Assessment document, submitted by the applicant to justify the need for this development, is out of date and therefore is not reflective of the current tourism offering in either the local area, or at district level. All qualitative data is taken from CDC's Visitor Economy of Chichester **2016 report** relating to estimated visits from 2015.

6.3. This is data taken before the growth in popularity of Airbnb and other holiday home rental websites/apps that have exponentially expanded the availability of serviced accommodation and furnished holiday lets. Airbnb shows 26 holiday homes of various sizes within a 4.8km radius from Foxbridge, all offering all year-round high-quality provision. Expanding this search area to encompass the visitor attractions promoted by the applicant (such within Arundel, Chichester, Crawley, Guildford and even 'sea-based attractions' (Planning Statement 6.19, page 19)) - and **Airbnb alone** indicates over 1000 available properties. Other direct booking holiday accommodation websites i.e., bookings.com, vrbo.com, cottages.com, all confirm plentiful availability of high-quality, year-round accommodation in the immediate local area, with **a total of 412 beds available within 7 miles of the applicant's site** (see Appendix A for a list of serviced accommodation within 7 miles of the applicant's site). These beds are available in an appealing variety of hotels, B&Bs, pub hotels, furnished holiday lets and all-year-round glamping units.

- 6.4. This representation draws attention to a similar planning application (**22/01735/FULEIA**) located 400m distance from the applicant's site. This application seeks, among other things, a rural food and retail centre and glamping site, which would operate in direct competition with the current proposed development at Foxbridge and further decreases the need of such tourist and farm shop facilities. The other aspects of the application, namely a total of 17,169m² development of a farm hub, a rural enterprise centre and an equestrian centre will increase the traffic along Foxbridge Lane and in the general area, further impacting on tranquillity. These application sites share the same routes in/out and will compete for space on the rural roads and within the same landscape area.
- 6.5. Effective due diligence into the actual provision of tourist accommodation in the area (as highlighted above) demonstrates that current data does not support the applicant's assertion that there is an essential and/or local need or demand for the proposed 816 bedspaces development at this site.
- 6.6. The site is 22 miles from Chichester in an area with exceedingly limited public transport. For example, to reach the site from the closest rail station in Billingshurst, requires a 11.2km journey by car. The bus which links the site to the rail station in Billingshurst (numbers 64 and 69) run only once per day on certain weekdays (the 64 runs Mon to Thu and the 69 on Tue and Fri only). Consequently, the site is not well located to meet this identified need for *"overnight accommodation in and around Chichester"*; nor is this a local need to Plaistow and Ifold Parish or the North of the Chichester district. Likewise, the site is poorly located to access the various identified visitor attractions outlined within the Application. This matter dovetails with Chichester Local Plan Policy 8, which requires new development to be *"well located and designed to minimise the need for travel..."* and Policy 39, which requires the development to be *"designed to minimise additional traffic generation and movement, and not create or add to problems of safety"*.
- 6.7. Regarding Policy 45 (c) of the Chichester Local Plan, the proposed development is plainly not small scale. This is an outline application for 121 dwellings, a 50-bed hotel, restaurant and all the associated infrastructure required to support such a development. It is noted that during the pre-application process (**20/02097/PRESM**) the Local Planning Authority queried the scale and justification for **only 40 lodges**; and stated that the proposal failed to demonstrate that the development required a rural location. The Local Planning Authority had concerns regarding the spread of built form within the countryside location. The current application is for a development far larger than originally proposed and the applicant has failed to allay the Local Planning Authority's original queries/concerns for a smaller development in this outline application.
- 6.8. The Local Planning Authority also raised concerns that there would not be enough on-site leisure facilities provided to justify 40 no. large lodges; (a farm shop, restaurant and bar, kitchen garden, a wellness centre, a farmyard/petting zoo and outdoor pursuit centre, set within a re-landscaped site along with ecological,

swimming and fishing ponds, ecological parks and nature trails). These concerns are likely to be amplified with a larger proposal for 121 dwellings and a 50-bed hotel. It is noted that despite submitting an application which far exceeds the original pre-application proposals, some of the on-site leisure facilities referred to have been removed e.g., a farmyard/petting zoo.

6.9. Nevertheless, with reference to the many dismissed planning appeals outlined in section 4 and the Local Planning Authority's pre-application concerns regarding 40 lodges (scale and spread of built form within the countryside location) it is not possible for the applicant to satisfy the requirement for more on-site leisure facilities, without further breaching Policy 45 (as well as many other Policies) in terms of causing harm via large scale development, which impacts on the landscape and rural character of the area.

6.10. The total number of dwellings within the Parish of Plaistow and Ifold is 821 (this is the data provided by CDC to support the Parish Council determine its Council taxbase). Figure 1 shows the four distinct settlement areas within the Parish. The approximate distribution of housing numbers per settlement are as follows: Plaistow: 302, Ifold: 400, Durfold Wood: 53 and Shillinglee: 66.

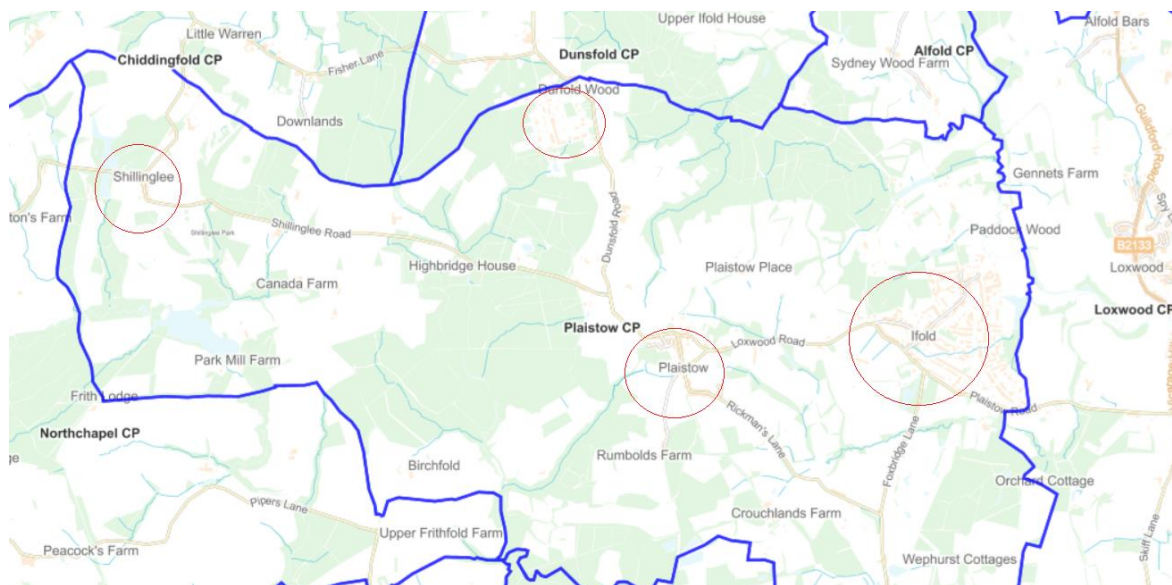


Figure 1. A map highlighting the distinct settlements within the Parish of Plaistow and Ifold.

6.11. The applicant's figures to determine the number of occupants anticipated at the site at any given time differ within their own reports.

- Within the Economic Benefits Summary the applicant states the site could have 617 guests at any given time (which is calculated from adding 549 (686 self-catered bedspaces @ 80% occupancy) + 68 (90 Hotel Spa @ 75% occupancy).
- The Quantum CE report V6 on Water Neutrality, submitted on behalf of the applicant, states the site could have 816 guests at any given time.

- The applicant states the middle estimate of employees of the site will be 76 FTE's, plus an undefined number of seasonal workers (Economic Benefits Summary – Jobs (operational))
- The applicant transport assumptions state that approximately 144 'Non-Occupants' will attend the site per day i.e., visitors from outside to the Farm shop/Spa/Restaurant.

6.12. Therefore, the total number of people on the Site, on any given day, **ranges from 837 to 1,036.**

6.13. The proposed size of the development is akin to a new village / independent settlement area within the Parish and represents a 15% increase in dwelling numbers. The site will cater for a large number of occupants also equivalent to an additional settlement within the Parish. The population size of Plaistow and Ifold Parish is 1,898 (2011 census) and this site will increase the population of the parish by 54.5%. Regarding Policy 45 (d), the size / scale of the development will generate significant increases in traffic flows that will have an adverse impact on the landscape and rural character of the area. The site is not well located to access the visitor attractions highlighted in the Design & Access Statement and in Table 5 of the Transport Assessment. The only viable means of transport - both to and from the site and to and from the promoted visitor attractions - is by private car, down narrow country lanes, which are some distance from main roads. Please refer to Section 7 below regarding the local bus service and closest train station. Many of the promoted journeys are over 20 miles away, in addition to the original arrival /departure traffic to and from the site (see map at Appendix A). There will be a resulting loss of tranquillity and reduced residential amenity. This was an important consideration in the dismissed appeal for the construction of 10 dwellings and vehicular access to replace the existing Golf Club (APP/L3815/W/18/3206819). The Planning Inspector highlighted that the development would be heavily reliant on private cars and as such would not amount to sustainable development. Almost exclusive reliance upon private car to access the site and all other facilities/activities demonstrates that the proposal is unsustainable.

6.14. Further information can be found in the Parish Council's Landscape Objection report and Transport Objection report submitted to the Local Planning Authority on 18th and 20th of November respectively.

6.15. It must be a material consideration that the site has previously come forward for the development of 10 dwellings, which is significantly less than the proposed development. However, the detrimental impact these 10 dwellings would have had upon the character and appearance of this part of the countryside was a key consideration of the Planning Inspector when dismissing the applicant's previous Appeal: Foxbridge Golf Club, **(APP/L3815/W/18/3206819)**.

6.16. Regarding Policy 45 (e) of the Chichester Local Plan, the applicant provides no evidence of local demand for a restaurant or bar. These facilities were originally

available at the site when it operated as a golf club and their underuse was reported at the time of its closure in 2019. Conversely, and somewhat ironically, the applicant undermines any local need /demand for a restaurant and/or bar by promoting other eateries in the area as being 'attractions'. On page 11 of the Design and Access Statement, the applicant extols the virtues of two local pubs "*...for those who enjoy fine dining there is the Bat & Ball located in Wisborough Green (5 mins) and the Half Moon Inn in Kirdford (7 mins)*".

- 6.17. The applicant has not considered the impact of the proposed 'farm shop' on existing local businesses. There is no local need for a 'farm shop'. The Parish has two existing small-scale privately owned/run shops, which support the community (a further shop exists within Kirdford village). No consideration has been given to the adverse impact upon these local businesses by an additional shop competing for limited business. Rather than the applicant's proposals supporting the local economy and community, by promoting the use of existing facilities, it proactively seeks to undermine the local economy (shops / bars / restaurants) by providing on-site facilities, which will directly compete with local provision. Of note, the existing local facilities provides employment for residents and meets the local need/demand.
- 6.18. The applicant has given no consideration to the current pending planning application at Crouchlands Farm – less than 1 mile away – which also includes a farm shop (**22/01735/FULEIA**). The outcome of this application will have a material impact upon the applicant's proposals. Both 'farm shops' will compete with one another, as well as with the three other local shops (Ifold, Plaistow and Kirdford).
- 6.19. There are no proposals for farming operations at the site, as part of this development, which would be required to provide stock for a farm shop. All produce would need to be delivered to the site, causing additional traffic pressures on the rural roads, and adversely impacting local amenity.
- 6.20. It must be recognised that this development has the potential to adversely impact on the viability of the existing small sustainable individual hosts of local holiday accommodation in the area. No consideration has been given to the potentially damaging effect on these existing local accommodation businesses.
- 6.21. Likewise, no consideration has been given to the pending planning application at Crouchlands Farm – less than 1 mile away – which includes a glamping site. The outcome of this application will have a material impact upon the applicant's proposals.
- 6.22. Regarding Policy 45 (f) of the Chichester Local Plan, the applicant has failed to demonstrate why their proposals require a rural location, or that it cannot be accommodated in a more appropriate location i.e., closer to Chichester thereby meeting the identified need for 'overnight accommodation in and around Chichester'. Equally, closer to the various District visitor attractions promoted by the applicant, some of which are in excess of 20 miles away from the site.

7. Transport and Accessibility and Parking

- 7.1. The proposed development is not well located, being in the North of the Plan area in a remote and isolated setting away from public transport links and the proposed development is not designed to minimise the need for travel, as outlined above. The development is completely reliant upon the use of private cars and cannot “*encourage the use of sustainable modes of travel as an alternative*”. Consequently, the development is unsustainable and unable to comply with Policy 8 of the Chichester Local Plan.
- 7.2. Whilst paragraph 8.4 of the Chichester Local Plan recognises that the more “*rural parts of the Plan area [have] a high reliance on car travel to access key services and facilities, with limited public transport services*”, Policy 8 also states that new development is required to be “*well located and designed to minimise the need for travel...*”. It should also “*encourage the use of sustainable modes of travel as an alternative to the private car*”.
- 7.3. The proposed development appears to be designed to attract visitors from across the district, region and nationally – as holiday makers - which will see a huge increase in the amount of traffic within the local area.
- 7.4. The applicant promotes tourist attractions within Arundel, Chichester, Crawley, Guildford and even ‘sea-based attractions’ (Planning Statement 6.19, page 19) all of which are located many miles from the site, with the only realistic means of access being by private car (Appendix B).
- 7.5. Due to the rural location of the site, the limited existing transport infrastructure in the area and the array of possible excursion destinations, minimal mitigation of the use of private car can be achieved through the implementation of Policy 8, in terms of: -
- Working with West Sussex County Council, other transport and service providers and developers to improve accessibility to key services and facilities and to provide an improved and better integrated transport network
 - Working with relevant providers “*to ensure that new facilities are readily accessible by sustainable modes of travel*”
 - Promoting “*more sustainable travel patterns and encourage increased use of sustainable modes of travel, such as public transport, cycling and walking*”
 - “*Targeted investment to improve local transport infrastructure, focusing on delivery of improved and better integrated bus and train services, and improved pedestrian and cycling networks*”
 - “*Measures to promote behavioural change in travel choices*”
- 7.6. Ultimately, visitors to the Site cannot: -

- walk or cycle to any of the promoted tourist attractions
- walk or cycle to local attractions. The Parish Council notes that on page 11 of the Design and Access Statement, the two local pubs listed are referenced by the driving time from Foxbridge, thereby acknowledging that even the closest local attraction will require the use of a car: *“For those who enjoy fine dining there is the Bat & Ball located in Wisborough Green (5 mins) and the Half Moon Inn in Kirdford (7 mins)”*
- access train services without the use of a private car
- access the desired area via a reliable and competent bus services

7.7. The nearest bus stops, on Rickman’s Lane, are some 830m walk distance from the centre of the site (not 550m as stated in the TA). The two bus services (64/69) operating from these stops only run once per day on certain weekdays (the 64 runs Mon to Thu and the 69 on Tue and Fri only). The next nearest stops are at Plaistow Road (a 1.2km walking distance) from the site where the 42 bus operates once per day from Mon to Fri. The nearest rail station is 11.2km away at Billingshurst.

7.8. Therefore, the proposed development is unsustainable and unable to comply with Policy 8. The development is completely reliant upon the use of private cars and cannot *“encourage the use of sustainable modes of travel as an alternative”*.

7.9. Policy 39 of the Chichester Local Plan requires the development to be *“designed to minimise additional traffic generation and movement, and not create or add to problems of safety”*. Paragraph 18.1 states that it is necessary to consider *“the impact of a new development on the existing transport network, how it links to the network and impacts on Highway safety”*.

7.10. The Parish Council submits that a potential requirement for up to 413 car parking spaces demonstrates a high level of traffic generation and movement in what is acknowledged to be a rural tranquil area.

7.11. Many applicable Planning Appeal decisions for this area have identified one of the main issues as being the effect of even minor developments on the character and appearance of the area together with the reliance on private cars and the sustainability of such developments due to the limited accessibility. Policy 39 encourages *“development that can be accessed by sustainable means of transport”*. A potential requirement for up to 413 car parking spaces would suggest the contrary.

7.12. The site has the potential for up to 816 residential users, an unspecified number of day visitors and services and 114 staff.

7.13. Given the high house prices / cost of living in the immediate area (Plaistow, Ifold and Kirdford) and the average low pay of employees on site (domestic staff / working in the restaurant and farm shop) the vast majority of the 114 employees will not be sourced from the local area and therefore will be commuting from outside the Parish area i.e., from larger population centres where the cost of living is lower.

- 7.14. The site is in a remote, rural area, which is poorly serviced by reliable and frequent public transport. Therefore, the only realistic means of access for the above identified people – either arriving at the site itself, or traveling out of the site to other facilities, attractions, and services - is by private vehicle.
- 7.15. The applicant acknowledges that road widening/passing places along Foxbridge Lane would be required. This confirms that the applicant anticipates the development generating a significant increase in traffic, which cannot be safely accommodated by the current road network without significant alteration. This fails to satisfy the requirements of Policy 39.
- 7.16. Foxbridge Lane is an essential pedestrian link to Footpath 619, which is the only pedestrian access link between Ifold and Plaistow and is well used during the dryer months when the clay base allows. The additional traffic using Foxbridge Lane would represent a safety issue to all pedestrians and other vulnerable road users, but particularly those using Foxbridge Lane to access footpath 619.
- 7.17. The Landscape and Visual Impact assessment (10.47 – 10.49) acknowledges that the environmental zone status of the site and surrounding area will be downgraded from E1 to E2 contrary to Policy 39, which requires no damage to the environment.

8. Development in the North of the Plan Area

- 8.1. Policy 25 of the Chichester Local Plan states that provision is made for small scale development that will: -
- a) Conserve and enhance the rural character.
 - b) Conserve and enhance the quality of its Landscape.
 - c) Conserve and enhance the natural and historic environment.
 - d) Safeguard existing local facilities.
 - e) The policy allows small scale developments that address local employment needs and supports the Village facilities.
- 8.2. The application advises that there will be 816 bedspaces (Water Neutrality report table 1.1 page 4) and 114 on site jobs (planning statement 6.29 page 21). In addition, there will be day visitors to the restaurant, health café, farm shop, spa etc with an associated requirement for visiting service personnel and vehicles (refuse collection, recycling, laundry, food delivery for the restaurant and supermarket home delivery etc). Therefore, the total number of people on the Site, on any given day, ranges from 837 to 1,036. There is potential for the number of people on Site to equal that of the population of Kirdford Parish (1063 in 2011 census) thus dwarfing all other settlements in the Parish area. The electorate figure for the whole of Plaistow and Ifold Parish area, as of September 2022, was 1646.

- 8.3. This contradicts Policy 25 of the Chichester Local Plan as this development is not small scale and is the equivalent of a new village, outside of any settlement boundary, with the transient ever-changing population which would be entirely reliant on private car for access.
- 8.4. The application fails to explain how the increase in traffic can enhance rural tranquillity. The Traffic Assessment notes that WSCC standards could require for up to 413 parking spaces (311 holiday parking spaces and 102 shop/restaurant car parking spaces). This would clearly not respect the natural environment and landscape or enhance the remote and tranquil rural character for the area.
- 8.5. The application suggests that the spa facilities would be available to local residents (which would presumably be after priority has been given to the 816 paying guests) and yet the transport assessment advises *“It is considered that the majority of visitors to the health club would be people staying at the holiday units or hotel rooms”*. The Parish Council notes that it is not within the remit, or gift of the Local Planning Authority to condition any planning permission with a requirement that the facilities must be made available to the local population and at any discounted rates i.e., enforce the ‘promises’ made by the applicant to the local population during their public consultation process (18.05.2022) *“discounted incentives will be made to residents living locally”* and *“discounts for local residents will be available across some of our services”*. Given that the applicant acknowledges that the majority of visitors to the health club would be guests at the site it is clear the proposals provide no local or community offer or serves any local need - it provides a destination drawing people in from outside the local area. This is reflected in the potential requirements for up to 413 car parking spaces.
- 8.6. The requirement to widen Foxbridge Lane and construct a second access into the site, with the associated vision splays, will have a detrimental and urbanising/suburbanising effect on the rural character of the area. The very fact that the development requires road widening works and a second entrance confirms that it is both inappropriately located and a large-scale development and as such fails to meet the requirements of policy 25.
- 8.7. The Landscape and Visual Impact Assessment (10.47 – 10.49) acknowledges the environmental zone status of the site and surrounding area will be downgraded from E1 to E2 and is therefore contrary to the requirement of Policy 25 to conserve and enhance the natural environment.

9. Development Strategy and Settlement Hierarchy

- 9.1. The application site is outside a defined Settlement Boundary in open countryside and rural in character. It is therefore considered ‘Rest of Plan Area’.
- 9.2. Consequently, in accordance with Policy 2, development is limited to that which requires a countryside location or meets an essential local rural need or supports rural diversification in accordance with Policies 45-46.

- 9.3. Chichester Local Plan strategic objective 5.6 states that *“The Rest of the Plan Area, defined as the areas outside defined Settlement Boundaries, is rural in character with many smaller villages, hamlets and scattered development along with open countryside. Therefore, development in the Rest of the Plan Area is subject to greater restrictions and limited primarily to that which requires a countryside location or meets an essential local rural need, supports rural diversification and sustainability of the countryside. More detailed policies relating to development in the Rest of the Plan Area are set out in the Strategic Delivery Policies and include Policy 45 Development in the Countryside and Policy 46 Alterations, Change of Use and/or Re-use of Existing Buildings in the Countryside.”*
- 9.4. If the site is considered to be part of the Plaistow/Ifold Service Village (although the Parish Council asserts this should not be possible, as Chichester Local Plan strategic objective 5.5 states that *“all settlements classed in the hierarchy as Service Villages or above are defined by Settlement Boundaries”* and Plaistow does not have a Settlement Boundary and Foxbridge is not within or adjoining the Ifold Settlement Boundary) then ‘small-scale’ and ‘identified local need’ remains the key objectives for all development. For example, Policy 2 of the Chichester Local Plan states that *“Provision will be made for [...] Local community facilities, including village shops, that meet identified needs within the village, neighbouring villages and surrounding smaller communities, and will help make the settlement more self-sufficient”* and *“Small scale employment, tourism or leisure proposals”*.
- 9.5. As detailed above, the proposal is very large; does not meet any identified local need; and directly conflicts with / undermines existing local facilities such as the shops, existing visitor accommodation run by local people within the area and local beauty practitioners (spa).
- 9.6. No evidence has been provided to show that the uses meet an essential local rural need or require such a rural location. It is important to refer to the pre-application advice for only 40 lodges, whereby the scale of the development and the requirement for a countryside location was queried by the Local Planning Authority.
- 9.7. Outside Chichester city and the settlement hubs the emphasis is on small scale tourism or leisure proposals. With a potential for 816 guests, in addition to any spa/health club, bar and restaurant users, this application cannot be considered small scale.
- 9.8. The location is unsuited to the ‘local’ attractions that it seeks to promote such as Arundel, Chichester, Crawley, Guildford, and sea-based attractions all of which would be inaccessible except by car.

10. The Economy and Employment provision

- 10.1. According to Policy 3 of the Chichester Local Plan, economic development in rural parts of the plan area must be *“...small-scale employment development [...] permitted in appropriate circumstances where commercial demand exists.”*

- 10.2. Policy 3 of the Chichester Local Plan recognises the need for economic growth within rural parts of the plan area, stating the importance of *“planning to provide a wider range of local employment opportunities in the rural parts of the Plan area”*; however, it continues *“...small-scale employment development or live/work units, including extensions to existing sites in rural areas, may be identified in neighbourhood plans or permitted in appropriate circumstances where commercial demand exists.”*
- 10.3. Policy 3 must be considered alongside Policies 25 (Development in the North of the Plan Area) and 45 (Development in the Countryside) and implemented accordingly. It cannot be considered/implemented in isolation.
- 10.4. Key to the economic growth aspiration *“to provide a wider range of local employment opportunities in the rural parts of the Plan area”* is ‘local employment’, ‘small scale’, ‘appropriate’ and to meet ‘commercial demand’.
- 10.5. Given the high house prices / cost of living in the immediate area (Plaistow, Ifold and Kirdford) and the average low pay of employees on site (domestic staff / working in the restaurant and farm shop) the vast majority of the 114 employees will not be sourced from the local area and therefore will be commuting from outside the Parish area i.e., from larger population centres where the cost of living is lower. Therefore, the proposed development is unlikely to provide the required ‘local employment opportunities’.
- 10.6. The proposals, in fact, undermine local employment opportunities. The farm shop and restaurant will draw business away from the existing local shops /pubs/cafes/restaurants/accommodation. The applicant’s proposals could support these local businesses; however, the desire to maximise profit means that they have placed themselves in direct competition with the local economy, which will suffer as patronage is drawn to the site. This has the potential to cause these local businesses to fold and local people to lose their employment as a result. Likewise, the site undermines other local businesses which offer accommodation and beauty treatments.
- 10.7. The proposed development is not small scale or appropriate in the area (in terms of sustainability and impact on the landscape) and has not demonstrated a commercial demand in the local area. Please refer to paragraphs 6.2, 6.3 and Appendix A for details of the current local commercial picture.

11. Built Tourist and Leisure Development

- 11.1. Policy 30 of the Chichester Local Plan requires the development to be sensitively designed to maintain the tranquillity and character of the area and minimise impact on the natural and historic environment.
- 11.2. With a transient population of up to 816 residents, the various commercial services required to run the development, 114 staff and the requirement for up to

413 parking spaces, this development will not be tranquil and will not maintain the character of the area. The number of users will significantly increase the associated private car use and service vehicle movements in the area. The resulting traffic will have a major impact on both the natural and historic environment, not least the listed Foxbridge Farmhouse located immediately opposite.

- 11.3. Policy 30 requires that new tourist development be on a scale appropriate to the location. The scale of the proposed development is manifestly inappropriate for the location. The Local Planning Authority queried the scale of 40 lodges and other facilities at the pre-application stage. The transient population is not encouraged to directly support or participate in the local community; conversely it will undermine the tranquillity and character of the area with excessive traffic movements, noise, light spill and built development in an otherwise undeveloped part of the countryside – as highlighted by the Planning Inspector when considering 10 dwellings on the site.
- 11.4. Simply by reason of its large scale, location and form, the proposal does not represent sustainable rural tourism or leisure development which respects the character of the countryside and local environment. A three-storey structure and general massing of a hotel, restaurant farm shop and 121 dwellings would have an urbanising impact, at odds with and eroding the local landscape character.
- 11.5. Whilst it is acknowledged that the golf course will have altered this landscape, this was in a relatively low-key manner, preserving the original patchwork of woodland and open land. This proposal will however create an uncharacteristic built form in the open countryside that does not make a positive contribution to the local landscape character or local distinctiveness.
- 11.6. The downgrading of the environmental zone status of the site and surrounding area from E1 to E2 is significant and demonstrates that this development is not sensitively designed to maintain the tranquillity and character of the area and minimise impact on the natural and historic environment.
- 11.7. The level of site occupancy and usage will necessarily require significant lighting and light spill. The fact that the applicant acknowledges the change from E1 to E2 and that the assessment area is so large is very important with adverse implications to the Parish character and protected species and the SDNP dark skies.
- 11.8. The proposed size of the scheme and types of accommodation will have significant implications of light spill; there will be a constant need for lighting at the site for access, socialising, parking, emergencies etc. A curfew would not sit well with a holiday destination, and such activity and lighting is at odds with the applicant's own ecology report, requiring a period of darkness.

12. Caravan and Camping Sites

- 12.1. The proposal provides for 31 of the 121 dwellings to be 'tents' and therefore Policy 31 of the Chichester Local Plan requires consideration. This requires that all the

specified criteria are met and in particular ‘a demonstrable need’, ‘appropriate scale’ and a “road network and the site’s access can safely accommodate any additional traffic generated”.

- 12.2. The applicant has not shown evidence of such ‘demonstrable need’ or demonstrated high demand on existing camping sites, as set out in guidance in Appendix 5 of the Local Plan.
- 12.3. The policy requires that sites are of an appropriate scale and would not diminish local amenity and maintain the tranquillity and character of the area. 31 tents with up to 186 occupants (Water Neutrality table 1.1) would impact local residential amenity and impact the sensitive ecology and biodiversity of ancient woodland. The ability to control noise, use of lights, movement around and through the site from the up to 186 occupants of 31 tents would be difficult to achieve by the applicant. This is a concern of The Woodland Trust who have raised an objection.
- 12.4. The policy requires that the road network can safely accommodate any additional traffic generated. This matter has been considered above and also within the Parish Council’s independent Transport Objection submitted on 20th November. However, in simple terms, the fact that the applicant requires a second entrance and acknowledges that road widening/passing places would be required confirms that the road network cannot currently safely accommodate the additional traffic that this development would generate. The additional traffic will create both real and perceived safety issues for non-motorised priority road users (walkers, cyclists, and horse riders).
- 12.5. Policy 31.1 requires a ‘demonstrable need’. The applicant has not provided any independent, verifiable evidence of a demonstrable need, or demonstrated high demand/over demand on existing sites in the area, as set out in guidance in Appendix E of the Local Plan. The applicant has failed to provide any independent evidence to demonstrate the commercial viability of any aspect of the proposals. In fact, the data presented has been taken from an out-of-date source, namely CDC's Visitor Economy of Chichester **2016 report** relating to estimated visits from 2015. The lack of use of the site’s previous restaurant and bar, when it functioned as a golf club, was reported at the time of its closure in 2019.
- 12.6. Appendix E of the Chichester Local Plan states: “*Additional Information relating to [...] proposals for [...] tourism and/or leisure development [...] 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.*”
- 12.7. As outlined above, the Visitor Accommodation Needs Assessment document, submitted by the applicant to justify the need for this development, is out of date and therefore is not reflective of the current tourism offering in either the local area, or at district level.

- 12.8. Using up-to-date data from sites such as Airbnb show 26 holiday homes of various sizes within a 4.8km radius from Foxbridge, all of high quality offering all year-round provision. Expanding this search area to encompass the visitor attractions promoted by the applicant (such within Arundel, Chichester, Crawley, Guildford and even 'sea-based attractions' (Planning Statement 6.19, page 19)) - and Airbnb alone indicates over 1000 available properties. Other direct booking holiday accommodation websites i.e. bookings.com, vrbo.com, cottages.com, all confirm plentiful availability of high quality year round accommodation in the immediate local area; within Chichester District; the South Downs National Park and more widely in West Sussex (see Appendix A for all serviced accommodation within 7 miles of the applicant's site).
- 12.9. Effective due diligence into the actual provision of tourist accommodation in the area (as highlighted above) demonstrates that current data does not support the applicant's assertion that there is an essential and/or local need or demand for the proposed 816 bedspaces development at this site.
- 12.10. The site is 22 miles from Chichester in an area with exceedingly limited public transport. For example, to reach the site from the closest rail station in Billingshurst, requires a 11.2km journey by car. The bus which links the site to the rail station in Billingshurst (numbers 64 and 69) run only once per day on certain weekdays (the 64 bus runs Mon to Thu and the 69 on Tue and Fri only).
- 12.11. The applicant has failed to demonstrate a 'demonstrable need'. What limited need they do allude to (overnight accommodation in and around Chichester) cannot be met by the current proposals.

13. Sustainable Design and Construction

- 13.1. Policy 40 of the Chichester Local Plan states that there are 10 points that the developer must demonstrate have all been considered. The following list shows the relevant points for these representations:
- Point 7 states that *"the historic and built environment open space and landscape character will be protected and enhanced"*
 - Point 9 states that *"the development is appropriate and sympathetic in terms of scale, height, appearance [...] and is sensitively designed to maintain the tranquillity and local character and identity of the area"*
 - Point 11 states to *"reduce impacts associated with traffic and pollution will be achieved"*.
- 13.2. The failure of the applicant to satisfy these points has been addressed within this document and within the Parish Council's Landscape and Traffic Objections, submitted on 18th and 20th of November.

- 13.3. The proposed development is very large with the indicative design of modern buildings which are not constructed in the local vernacular (i.e., Urban Blossom Poppy Units, 3 storey structure).
- 13.4. Given the size of the development - and for the development to be economically viable - it will require a large number of visitors and associated staff and service personnel/services, the majority of whom will need to access the site by private cars and commercial HGV vehicles. This will increase impacts associated with traffic and pollution and must be considered against the tranquil rural and historic environment. It is considered the applicant has not demonstrated how the development would meet these points in the policy.
- 13.5. In summary this proposal does not represent sustainable rural tourism or leisure development which respects or enhances the landscape character of the local countryside.

14. Heritage and Design

- 14.1. The Heritage Assessment produced to support the application fails on the following grounds:
- It fails to identify all the designated heritage assets which will be affected by the development.
 - It fails to consider the impact of the proposed scheme on the historic landscape.
 - It fails to consider the impact of the proposed scheme on neighbouring settlements.
 - It fails to successfully identify the full historic relevance of the closest Grade II Listed building, Foxbridge Farmhouse, and its historic and current setting. It then fails to fully assess the impact of the proposed scheme in terms of its size, traffic generation, noise, and light on the Farmhouse.
- 14.2. It must be a material consideration that in dismissing the applicant's previous appeal for 10 dwellings on the site (**APP/L3815/W/18/3206819**), the Planning Inspector referenced the adverse impact of the proposal on the undeveloped character of this part of the countryside. 10 dwellings were considered substantial built development in a rural setting. The Inspector noted the policy requirement to conserve and enhance the rural character of the area, a matter in which he found some harm. As detailed above, the scale and population of this development is far greater than 10 dwellings and is akin to a new settlement / village, which is similar in size to Kirdford and represents a 54.5% increase in the Parish's population. This increased size and scale of proposal will exacerbate issues regarding rural character, that the Inspector noted.
- 14.3. Accordingly, the proposed scheme fails on all counts to meet Policy 47 of the Chichester Local Plan and the NPPF paragraphs 195, 197, 199 and 201.

14.4. Policy 47 of the Chichester Local Plan states that *“new development which recognises, respects, and enhances the local distinctiveness and character of the area, landscape and heritage assets will be supported. Planning permission will be granted where it can be demonstrated that all the following criteria have been met and supporting guidance followed:*

1. *The proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including:*
 - *Monuments, sites and areas of archaeological potential or importance;*
 - *Listed buildings including buildings or structures forming part of the curtilage of the listed building;*
 - *Buildings of local importance, including locally listed and positive buildings;*
 - *Historic buildings or structures/features of local distinctiveness and character;*
 - *Conservation Areas; and*
 - *Historic Parks or Gardens, both registered or of local importance and historic landscapes.*
2. *Development respects distinctive local character and sensitively contributes to creating places of a high architectural and built quality;*
3. *Development respects existing designed or natural landscapes; and*
4. *The individual identity of settlements is maintained, and the integrity of predominantly open and undeveloped character of the area..... local landmarks and the South Downs National Park, is not undermined.”*

14.5. According to Paragraph 195 of the NPPF: *“local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”*

14.6. According to Paragraph 197 of the NPPF: *“In determining applications, local planning authorities should take account of [...] the desirability of new development making a positive contribution to local character and distinctiveness.”*

14.7. According to Paragraph 199 of the NPPF: *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

14.8. According to Paragraph 201 of the NPPF: *“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

14.9. The following subsections will detail the failings of the applicant’s submitted Heritage Assessment.

Identification of the Local Heritage and the wider impact of the Scheme.

14.10. The report limits consideration of local heritage to just two Grade II listed dwellings and 1 Schedule Monument. The report does not consider the size of the development and its potential to impact a wider area than just immediate neighbouring buildings. It does not consider impact on the historic landscape in which the designated heritage assets are situated. Nor does it consider its impact on the historic village of Plaistow and the conservation area. Therefore, this calls into question the findings of the Heritage Assessment.

14.11. The Heritage Appraisal produced by HCUK group in support of the application identifies only 2 Grade II listed buildings; those closest to the development site, Foxbridge Farmhouse opposite the site and Costrong Farmhouse 450m from the site. It also identifies the scheduled monument Wephurst Glass House to the south east. But it fails to identify Keepers Cottage Plaistow Road Ifold, Grade II Listed, also within 450 m of the site.

14.12. It does not consider the wider impact on the Conservation Area of Plaistow and the 30 Grade II Listed buildings in Plaistow village. The report identifies no non-heritage assets of which there are several in Plaistow village. And there is no consideration of the historic landscape in which the designated heritage asset and the conservation Area and village are situated.

14.13. The Heritage appraisal does not consider the traffic generation, the changes proposed to Foxbridge Lane and the light and noise generation from such a large development. Without specific further analysis of these matters the impact on heritage, both for the buildings and the landscape in which these buildings are set, has not been adequately assessed. Therefore, this calls into question the findings of the Heritage Assessment.

14.14. The proposed scheme will impact on the quiet country lanes, creating noise and additional light on and around the site, where it is currently very quiet and dark.

14.15. The scheme creates a new holiday village in the countryside which is historically of small, dispersed villages and farmsteads set in small fields bounded by field hedging, ancient assarts and woodland. It will therefore detract from the historic landscape and there has been no attempt to engage with what constitutes the historic landscape to inform the proposed development. Although only an outline application the information presented in the documents shows no regard for the historic landscape or historic vernacular form in this Parish. The proposed scheme is fundamentally urban its form and layout.

Traffic and the Historic Environment

- 14.16. The site is a destination site generating substantial additional traffic, particularly in Foxbridge Lane and Plaistow Road Ifold but also through Plaistow village. The Heritage Appraisal does not consider impact of traffic movement on any heritage asset and their setting.
- 14.17. The proposed development must by the nature of the development and its location be considered as a 'destination' development, requiring numerous vehicle movements. It is also a very large development, with 816 people residing on site, as well as a Spa, visitors and a large work force. This volume of traffic is underlined by the amount of car parking provision on site. The site will also generate service vehicles including HGV.
- 14.18. The Heritage Appraisal does not consider the impact of traffic movements on those historic buildings identified. Nor does it identify the Plaistow Conservation Area or other historic assets in the wider geography and the access highway network.
- 14.19. The grade II listed buildings on the route through Plaistow Conservation Area to access the site are not identified, assessed, and considered in relation to the development.
- 14.20. Increased traffic movements both cars and HGV will change the historic environment, with additional road noise, vibration, and a change to the relative quiet historic country lanes. The vehicle movements to the site and carparking on site will change the setting of the Historic buildings and the Conservation Area.
- 14.21. The proposal requires the widening of Foxbridge Lane, provision of formal passing places, additional signage, and the need to cut back vegetation to create site lines down the road. This will change the transform a modest and quiet country lane, which originally just served Foxbridge Farmstead. In doing so it will particularly impact Foxbridge Farmhouse and its setting. There has been no consideration of this matter in the report.

Consideration of Costrong Farmhouse identified in the Heritage Appraisal

- 14.22. The Appraisal dismisses Costrong Farmhouse as being too far away to suffer any impact to its setting.
- 14.23. The development is large with a substantial number of buildings and structures on site, large car parks, sports facilities with hard landscaping, over the entire 65 acres and this is only 450m from the Farmhouse. Currently, the farmhouse is set in a rural landscape which supports its historic purpose as a farmstead. The surroundings are a very quiet tranquil rural setting and essentially dark at night. The existing golf course is limited to soft landscaping with minimal built form. Therefore, there is a substantial change with the extent of development across the site. The use of the site will generate noise, light and additional traffic movements to and from the site on the Kirdford road, running past the building.

14.24. The noise baseline report produced by Lustre for the applicant identifies on paragraph 2.3 that ‘the main and constant noise on site is bird song and rustling leaves’, with occasional aircraft flyover and road traffic noise. The site is tranquil. The development will substantially change that environment, with in the order of 1000 people on site, holidaying, playing sports, football, tennis, socialising and working and with associated vehicle movements. This noise will change the historic rural environment in which the farmhouse is set.

14.25. The site is currently dark at night with no lights. Even though it is stated external lighting will be controlled there will be light emanating from the site and from the many holiday residential units and the restaurant. The examples of the proposed units show substantial glazing, and the tents will also be lit inside and there will be substantial light spill from 121 units and a 50-bed hotel and the restaurant. Diners will require lighting to see to eat, if seated outside. This again will substantially change the environment, which is historically very dark. It is noted that the lighting assessment of the scheme will down grade the site from E1 to E2.

Consideration of Foxbridge House identified in the Heritage Appraisal

14.26. The Appraisal does provide basic details of the listing. But it does not establish the historic importance of the farmstead or what constitutes the setting in which the farmstead sits. Therefore, it cannot determine there is no adverse impact.

14.27. The appraisal does not detail the setting, it shows no evidence of its setting, no photographic evidence, just one photograph to the side of the dwelling and no historic mapping of the area. The only comment present is on paragraph 3.3, that states *“Its surroundings, on both sides of Foxbridge Road, contribute to an understanding of its form, appearance and contribution to the historic environment”*. The Appraisal does recognise that both sides of the road contribute but then does not engage with the large size of the development, which is immediately to the other side of Foxbridge Lane, and the resultant impact.

14.28. The appraisal concludes that the effect of the proposed development on the Farmhouse is negligible but there is no examination of the size of the development.

14.29. The Appraisal does not recognise the size of the development across the whole 65-acre site with 121 residential units and a 50-bed hotel plus restaurant and farm shop. Accordingly significant changes to the immediate surroundings to the house and the landscape in which it sits are dismissed. The extensive carparking is likely to be visible from the farmhouse itself. The adjacent farmland remains as does the original farmstead buildings situated across the road. The golf clubhouse and use of part of the land as a golf course has eroded some of the setting but even so this former use was relatively low level with little built form as a golf course with limited membership and use. The proposed development will substantially change the setting around the listed house.

14.30. Road traffic impact is not recognised by the Appraisal. The development is a very large destination venue with substantial increases in vehicle movements,

changing the quiet rural quality of Foxbridge lane, undermining the farmstead setting with vehicle noise and vibration. It would appear from the transport report that the informal passing bay immediately in front of the farmhouse will be formalised creating additional noise disturbance and vibration. Traffic movement was identified in the Biogas Appeal Decision (**APP/L3815/C/15/3133236** and **APP/L3815/C/15/3133237**) as having significant impact.

14.31. The appraisal does not recognise any change in noise levels. Currently tranquillity contributes significantly to the setting of the Farmhouse.

14.32. The report on noise prepared by Lustre for the applicant states in paragraph 2.2 that given the rural setting of the site and its surroundings, the noise environment is, as expected, tranquil and in paragraph 2.3 the main and constant source of sound at the time of the site visits was birdsong and rustling leaves. Occasional noise from aircraft flyovers, traffic on Foxbridge Lane and livestock was also noted. Very distant and faint traffic noise was also audible at times. The report also determines that daytime and night time noise levels remain very similar, underlining the constant level of tranquillity. This environment will radically change for Foxbridge Farmhouse in such close proximity to the development. The property is particularly close to the restaurant and shop facility and carparking. Adding to the increased noise level from car movements, goods deliveries, and site users which will run late into the evening.

14.33. The appraisal does not recognise any change in artificial light levels. Currently dark skies contribute significantly to the setting of the Farmhouse. As reported above the development will require external artificial light, to light carparks, roads, and pathways and for outdoor leisure activities and dining. The individual units will have internal lighting with light spill further increasing light levels on site.

Consideration of Keepers Cottage identified in the Heritage Appraisal

14.34. Keepers Cottage is a grade II listed property located on Plaistow Road close to the site at Costrong Farmhouse. However, this property has not been identified by the appraisal.

14.35. The adverse impact will be similar to Costrong Farmhouse and similar comments apply. Plaistow road is a busier road and so the traffic impact will be less significant.

Plaistow village and Conservation Area

14.36. The Appraisal does not recognise the size of the development and that it is larger than the historic village, both physically and by the number of people on site. Accordingly, it will change the historic landscape in which this historic settlement sits. It fails to consider the impact on the historic village of Plaistow, the Conservation area and the 30 Grade II Listed buildings. By its sheer size it will generate a significant increase in built form and numbers of people 'living' in the parish, and will generate significant increase in traffic movements, noise, and light. There is no consideration of any increase in traffic movements generated by the proposed development through the village and the Conservation area.

14.37. The Foxbridge area is primarily a rural landscape of ancient field patterns interspersed with woods, assarts and hedges with very limited new development with most centred within the Ifold settlement. The area is one primarily of dispersed historic villages and farmsteads. A 65acre development will form a significant change, disrupting the historic landscape and the wider setting of the historic village. And creating a modern urban styled village. By not engaging with what constitutes the historic village and the historic landscape the proposed scheme has not shown any appropriate design response.

Summary

14.38. In failing to adequately assess and consider the historic environment, the proposed scheme has consequently failed to make any positive contribution and the harm generated by the scheme would far outweigh any benefit. There is no evidence that the proposed development has been designed to respect and enhance the historic assets and landscape. The proposed development cannot demonstrate it recognises, respects, and enhances the local distinctiveness and character of the area, landscape, and heritage assets.

15. Natural Environment

15.1. Policy 48 of the Chichester Local Plan requires that there is no adverse impact on the tranquillity and rural character of the area. The Parish Council respectfully draws attention to its dedicated Landscape Objection submitted on 18th of November.

15.2. The new development will consist of 121 dwellings together with a 50-bed spa hotel, Health Club, restaurant, bar, farm shop, concierge building, tennis courts and five-a-side football pitches and associated access roads and infrastructure.

15.3. The effect of this development will be both detrimental to the rural character of the area and would have a major impact on the existing tranquillity. In this respect it is of note that the Baseline Noise Survey identified *“the main and constant source of sound at the time of the site visits was birdsong and rustling leaves”* and that *“at night, background noise levels are extremely low”*.

15.4. The applicant acknowledges that the volume of additional traffic generated by the development would require both road-widening and the construction of a second site access with vision splays. This will have both an adverse impact on the character of the area and specifically Foxbridge Lane, and the considerable increase in traffic have a major impact on the tranquillity of the area.

15.5. The existing character and tranquillity of the area are the qualities that the applicant acknowledges and seeks to promote and exploit, but in so doing - by constructing 121 dwellings, a 50-bed hotel, spa, health club, restaurant and all the other associated built infrastructure - these special qualities will be effectively lost, or at best severely diminished. The Landscape and Visual Impact Assessment (10.47

– 10.49) acknowledges that the environmental zone status of the site and surrounding area will be downgraded from E1 to E2.

15.6. Policy 48.5 of the Chichester Local Plan requires the individual identity of settlements, actual or perceived, is maintained and the integrity of predominantly open and undeveloped land between settlements is not undermined. This development of 121 dwellings and a 50-bed hotel with considerable additional infrastructure fails this requirement on both counts.

15.7. There have been many planning appeal decisions in the Parish that recognise the tranquillity and rural character of the area. The Parish Council notes the appeal decision relating to a previous application at Foxbridge Golf Course for the construction of 10 dwellings. One of the main issues was the effect of the development on the character and appearance of the countryside. The Inspector noted that whilst the impact of the proposal (only 10 houses) 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 the development would be heavily reliant on private cars and as such would not amount to sustainable development.

15.8. This dismissed appeal (APP/L3815/W/18/3206819) must be the starting point for consideration of any further applications on the site. The appeal concerned 10 dwellings. This application is for 121 dwellings, a new 50-bed hotel, concierge building, restaurant, and associated infrastructure, representing a built physical environment 20 times greater than that of the dismissed appeal. Given the Inspector's stated reasons for dismissing the appeal against the refusal by the Local Planning Authority for the construction of 10 dwellings, it is difficult to see how the Local Planning Authority could now conceivably approve the current application.

16. Lighting

16.1. The application acknowledges that the development will require considerable external lighting however, large areas of the site are unaccounted for in terms of any proposed lighting. The new lighting across the site would also result in increase in sky glow and a high impact and moderate adverse effect on the site level. The environmental zone of the site and surrounding area will be downgraded from E1 to an E2. The Site is in the setting of the South Downs National Park and is part of the buffer region which contributed to the park being awarded Dark Sky Reserve status. Furthermore, The application attempts to blur the lighting impact of the development by suggesting no 'overall' change to the environmental zone across an arbitrarily large (78 km²) study area.

Insufficient and Inconsistent Evidence

- 16.1. In the Design Brief there is only one reference to illumination levels (10 lux for pedestrian routes which is in itself is inappropriate), leaving large areas of the site unaccounted for. In particular, the tennis courts, five-a-side football pitches and car park appear not to be illuminated.
- 16.2. With the exception of the Application Area section, which itself adds nothing on the subject of lighting, the document represents an off-the-shelf template whose only tailoring seems to be the address of the site and the name of the Local Planning Authority. Insufficient information is provided for a decision maker to be able to consider the potential effect of lighting at the application site.
- 16.3. Page 5 of the Executive Summary states that *“little or no impact from the proposed external lighting”*. This statement is at odds with the Landscape and Visual Impact Assessment (LVIA), which predicts a degradation of the environmental zone across the entire site.
- 16.4. The advice provided in the report is that *“a lighting designer is appointed at the next project stages”*. Whilst it is acknowledged that this is an outline application the Parish Council is of the opinion that the document lacks the level of even basic detail necessary for the Local Planning Authority to consider the principal of the proposed development in a light-sensitive area with the potential negative effect on the South Downs National Park Dark Skies status.
- 16.5. The Ecological Appraisal provides further guidance on lighting (especially page 88), however this also lacks the necessary detail to allow for a conclusive assessment of the intended lighting strategy.
- 16.6. Paragraph 10.47 to 10.49 of the Landscape and Visual Impact Assessment acknowledges that the loss in sky quality caused by the development would result in the site losing its E1 environmental zone status. It then attempts to reconcile this by suggesting that, in the context of Ifold and Costrong, the overall E1/E2 zone across the study area would remain unchanged. (Costrong ceased commercial operations 10 years ago). This rationale is at the root of how the dark skies in the UK have been eroded. It should also not be forgotten that the study area in question is 10km in diameter (paragraph 3.5 of the Landscape and Visual Impact Assessment). On such arbitrarily large scales, it is indeed unlikely that the ‘overall’ environmental zone would have changed. But this smoothing out of the development’s impact belies the truly detrimental effect that it will have in the region surrounding the site.
- 16.7. The site is within the setting of the South Downs National Park (SDNP) and is part of the buffer region which contributed to the park being awarded Dark Sky Reserve status. The awarding body – the International Dark-sky Association – recognise this in their summary of the SDNP: *“The Park’s efforts in seeking Dark Sky Reserve status have helped establish it as an important bulwark against the creeping advance of the furthest-outlying London suburbs”*.

- 16.8. The extent of the resulting light pollution of the development is greater than that being stated. Unlike glare and light-trespass, which can more easily be mitigated and possibly even contained, the effect of sky-glow reaches far beyond the boundary of the site. This is also why, paragraph 10.48 of the Landscape and Visual Impact Assessment, is misplaced to suggest the increase in sky glow would be 'localised'.
- 16.9. The lighting report and the Ecology Appraisal fail to reference each other; therefore it is considered that insufficient consideration in the report has been given to minimise risks to protected wildlife and in particular rare bat species when presenting the lighting appraisal; and the Ecology report recommendations cannot in reality be met.
- 16.10. The sheer size and spread of the proposed development across the whole site will ensure that there are few areas which are not lit with artificial lighting and the light appraisal acknowledges that the light zone will move from E1 to E2.
- 16.11. There will be in the region of 800 to 1000 people on site and overnight with 121 living units and a 50-bed spa hotel and restaurant. There has been no assessment of the need for light provision for safety, security, emergency and for socialising in the evening and at night, and the numbers of people potentially moving around the site. Imposing a night-time curfew to ensure that there are consistent dark periods on site would not be appropriate in a holiday resort. Therefore, the Ecology Appraisal recommendation of limiting lighting times to provide dark periods could not be achieved.
- 16.12. The proposed illustrative living units show large amounts of glass and tents from which there will be considerable light spill, and this has not been factored into the light or ecology appraisal. There will be people movements on site well into the night requiring lighting. Any outside eating areas in the restaurant and at each of the 121 units would require lighting. Blinds and curtains could not be consistently relied on to prevent light spill from the residential units.
- 16.13. Therefore, the site would change from essentially a dark environment to one with a constant need for artificial light at dusk and into the night, all year round.

Summary

- 16.14. The applicant has submitted an External Lighting Statement and Landscape and Visual Impact Assessment as part of their outline application. These acknowledge that external lighting will be required, with light spillage from the development and an increase in sky glow. The actual level/intensity/type of lighting has yet to be agreed but the in-principle decision to be made by the Local Planning Authority, with the knowledge that there will be a requirement for an as yet undefined level of lighting which will affect the Character of the Night Sky and result in the site losing its E1 environmental zone status, is whether Foxbridge is an appropriate location for such a development.

17. Coherence Issues

- 17.1. In addition to the fundamental objections to the proposals outlined above, there are several important coherence issues within the application documents, which should be considered by the Local Planning Authority.
- 17.2. There is a lack of coherence and cross-referencing between reports, such as the Landscape and Visual Impact Assessment, External Lighting Statement, Ecological Appraisal, Transport Assessment and Heritage Appraisal. For example, the Ecology report fails to consider or comment on the applicants External Lighting Statement, which is an important factor in protecting ecology, especially foraging and commuting bats. Similarly, the Visual Impact Assessment fails to consider the External Lighting Assessment and the Heritage Appraisal. Likewise, the Visual Impact Assessment fails to consider the findings of the Transport Assessment. All the reports have been written in isolation of one another and do not work together to inform a bigger picture. They are contradictory and, in places, undermine each other.
- 17.3. As outlined in Section 6 above, the applicant's figures to determine the number of occupants anticipated at the site at any given time differs within the various reports. The Economic Benefits Summary states the site could host 617 guests, in addition to 76 full-time employees, and an undefined number of seasonal workers. However, the Quantum CE report V6 on Water Neutrality, states the site could have 816 guests and the transport assumptions state that approximately 144 'Non-Occupants' will attend the site each day. The contradicting reports make it hard to establish the true number of people on site, which can range from 837 to 1,036.

18. Conclusions and Recommendations

- 18.1. The proposed development is wholly unjustified and is of an inappropriate size, scale, and location. The Chichester Local Plan identifies the area as remote and tranquil countryside. The conservation of the rural character of the area, and the high-quality landscape and environment are key objectives of the Chichester Local Plan. The size of the development is not 'small scale', which is a central requirement to meet Chichester Local Plan Policies 3, 25, 40 and 45. As previously highlighted, the site could see in excess of 1,000 people, thereby increasing Plaistow and Ifold's population by 54%, and creating a new settlement within the Parish. The applicant has failed to provide any objective justification for a rural location outside the settlement boundary.
- 18.2. Consideration must be given to previous refused planning applications and dismissed appeals both at the site and in the immediate vicinity. The dismissed appeal for 10 dwellings at the site (**APP/L3815/W/18/3206819**), which is significantly less than the proposed development, was considered by the Planning Inspector to have a detrimental impact upon the character and appearance of the countryside. The Local Planning Authority likewise raised concerns at pre-application for this proposal

(20/02097/PRESM), that 40 lodges would represent large scale development and spread of built form within the countryside location.

18.3. The applicant's site is poorly located in a remote area with poor public transport connections. Consequently, all users would be reliant upon private cars. The proposal fails to comply with Policies 8 and 39 of the Chichester Local Plan that require developments to be "*well located and designed to minimise the need for travel*" and "*designed to minimise additional traffic generation and movement, and not create or add to problems of safety*". The development will significantly increase road traffic, and have a detrimental effect on tranquillity, rural character, and appearance of the countryside.

18.4. The proposal fails to justify or evidence a local or essential need. Likewise, no evidence has been provided to demonstrate that local need cannot be / is not being met within, or immediately adjacent to existing settlements. The evidence produced to justify need is out-dated and insufficient, failing to acknowledge online visitor accommodation through websites such as Airbnb and Booking.com. The Parish Council notes and supports the comments made by Kirdford Parish Council and the list of alternate spa accommodation available in the area. Current data does not support this development. The applicant also fails to consider the similar application 400m from the site at Crouchlands Farm (**22/01735/FULEIA**), which, if approved, would further decrease the need for overnight accommodation and an additional farm shop. The Local Planning Authority should also consider permitted planning for similar venues in the local area. For example, less than 8kms away, Slinfold Golf Club already offers similar services to those proposed and have permitted planning for 70 bed hotel/ lodge (**DC/17/1164**), which has not been built yet. The Parish Council respectfully requests that the Planning Officer does due diligence to satisfy themselves of the commercial viability of what is proposed; considering the lack of evidence provided by the applicant and the already under used facilities elsewhere, which could increase their capacity *if* commercial demand would justify the expenditure.

18.5. The Heritage Assessment submitted by the applicant fails to identify all the heritage assets that will be affected by the development. It also fails to consider the impact on the historic landscape; the historic relevance of the Grade II Listed Foxbridge Farmhouse; the impact of the development on Foxbridge Farmhouse and the impact of the development on the historic village of Plaistow. In failing to comply with Policy 47 of the Chichester Local Plan and the NPPF paragraphs 195, 197, 199 and 201, the proposed scheme should be dismissed.

18.6. The applicant acknowledges that the development will require considerable external lighting; however, large areas of the site are unaccounted for in terms of any proposed lighting. The new lighting across the site would result in an increase in sky glow and a high impact and moderate adverse effect on the site level. This will affect the Character of the Night Sky and result in the site losing its E1 environmental zone status. It will also have a detrimental impact on the setting of the National Park.

- 18.7. The application lacks coherence between documents, with no cross referencing between the reports. The applicant's figures differ within the reports and paints a confused and ill-conceived proposal.
- 18.8. On the strength of this submission, the Parish Council strongly objects to the application.

19. Appendix A

Serviced Accommodation within 7 miles of the Foxbridge Golf Club Site – November 2022

Type of Accommodation	Name	Bed-spaces	Miles from Foxbridge	Website	Seasonal? Y / N	Quality Rating
FHL - 5 Bedroom Holiday Home	Belton Acre Ifold	10	1.4	Airbnb https://bit.ly/3hmsRzW	N - all year round	4.92/5
FHL - 1 Bedroom Holiday Home	The Lodge at the Lake House Ifold	3	1.6	Cottages.com / VRBO / Airbnb https://bit.ly/3DHe5va	N - all year round	New - no reviews yet
FHL - 1 Bedroom Holiday Home	DragonFly Lodge Ifold	3	1.6	Airbnb www.hillcroftholiday.co.uk	N - all year round	4.98/5
FHL - Glamping - Shepherds Hut	Foxbridge Shepherd's Hut,	2	0	Airbnb https://bit.ly/3hmvhP2	N - all year round	4.95/5
FHL - 3 Bedroom Holiday Home	Arun Cottage, Loxwood	6	2.4	Cottages.com / VRBO / Airbnb https://bit.ly/3WNvbJB	N - all year round	New - no reviews yet
FHL - 1 Bedroom Holiday Home	The Coop, Kirdford	2	2.3	Airbnb https://bit.ly/3UID3aD	N - all year round	4.98/5
FHL - 1 Bedroom Holiday Home	Redwood, Loxwood	2	2.4	Airbnb https://bit.ly/3fNIHnX	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	Little Michaelmas, Alfold Bars	3	3.7	Airbnb https://bit.ly/3NRsJoq	N - all year round	4.97/5
FHL - 1 Bedroom Holiday Home	Cow Shed, Plaistow	2	1.4	Airbnb https://bit.ly/3hj2n2d	N - all year round	4.96/5
FHL - 2 Bedroom Holiday Home	Cabin, Turtles Farm, Alfold Bars	4	4	Airbnb https://bit.ly/3FVpWZI	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	The Old Cowshed, Shillinglee	2	3	Airbnb https://bit.ly/3DOKBvw	N - all year round	4.99/5

FHL - 1 Bedroom Holiday Home	Walthurst Studio, Kirdford	2	3	Airbnb https://bit.ly/3td3gMp	N - all year round	4.94/5
FHL - 1 Bedroom Holiday Home	Cart House, Rumbolds Farm, Plaistow	2	2	Airbnb / VRBO https://bit.ly/3FZZzBC	N - all year round	New - 2 reviews
FHL - 1 Bedroom Holiday Home	The Nest, Plaistow	2	1.4	Airbnb / VRBO https://bit.ly/3fNoPjH	N - all year round	4.95/5
FHL - 1 Bedroom Holiday Home	Cabin, Kirdford	2	2.3	Airbnb https://bit.ly/3NMbmVQ	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	The Quail Cabin, Kirdford	2	2.3	Airbnb / Henry Adams Holiday Cottages https://bit.ly/3hl1Dtw	N - all year round	New - no reviews yet
FHL - 2 Bedroom Holiday Home	Little Lands, Durfold Wood	4	3	Airbnb https://bit.ly/3NPQcWJ	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	Private Annex with hot tub, Kirdford	2	1.2	Airbnb https://bit.ly/3E9vnl1	N - all year round	4.92/5
FHL - 3 Bedroom Holiday Home	Sparr Farm Barn, Kirdford	6	3.9	Airbnb https://bit.ly/3hl3j6i	N - all year round	4.94/5
FHL - 2 Bedroom Holiday Home	Porterhouse Studio, Alfold Crossways	4	5.5	Airbnb https://bit.ly/3zXHtMv	N - all year round	4.79/5
FHL - 3 Bedroom Holiday Home	Country House, Rudgwick	5	6.3	Airbnb https://bit.ly/3fL7RT7	N - all year round	5.00/5
FHL - 4 Bedroom Holiday Home	Family Home, Plaistow	7	2	Airbnb https://bit.ly/3NRc5W0	N - all year round	New - 1 review
FHL - 1 Bedroom Holiday Home	Cottage, Dunsfold	2	5.4	Airbnb https://bit.ly/3hrherC	N - all year round	4.94/5
FHL - 2 Bedroom Holiday Home	Hurst Hill Cottage, Dunsfold	6	5.4	Airbnb https://bit.ly/3hmDL8Q	N - all year round	4.55/5
FHL - 2 Bedroom Holiday Home	Farm Stay, Dunsfold	4	5.4	Airbnb https://bit.ly/3A0IKm3	N - all year round	4.2/5

FHL - 6 Bedroom Holiday Home	Californian Country Home, Chiddingfold	12	5.6	Airbnb https://bit.ly/3FXDALn	N - all year round	New - 2 reviews
FHL - 2 Bedroom Holiday Home	Bruce Wittington, Balls Cross	4	3	Direct Only	N - all year round	
FHL - Glamping - Family Tipi's	Alpaca My Tipi, Ifold	10	1.6	booking.com www.alpacamytipi.co.uk	Y - summer only	5.00/5
FHL - Glamping - Bell Tent	The Woods, Durfold Wood	5	3	Airbnb https://instagram.com/thewoodssurrey?igshid=YmMyMTA2M2Y=	Y - summer only	4.9/5
FHL - Glamping - Yurt	Glamping Holiday Alfold	5	3	Hip Camp https://www.hipcamp.com/en-US/land/england-surrey-glamping-holiday-nelhle5r?filters=lodging&adults=1&children=0	N - all year round	
FHL - Glamping - Shepherds Hut	Ganders Gate Glamping, Kirdford	2	4	https://www.gandersgateglamping.co.uk/	N - all year round	
FHL - Glamping - Pod	Swaynes Pods, Rudgwick	4	6	Hip Camp https://www.hipcamp.com/en-US/land/england-west-sussex-swaynes-pods-nelhlnm6?filters=lodging&adults=1&children=0	N - all year round	
Bed & Breakfast - 5 Double/Twin rooms	Hurst Hill Dunsfold	10	6	Booking.com http://bit.ly/3X4sQRr	N - all year round	9.5
FHL - 1 Bedroom Holiday Home	Stable Cottage, Plaistow	2	2	Booking.com / VRBO http://bit.ly/3TSQuhj	N - all year round	9.5

Pub / Hotel	The Swan Inn, Chiddingfold	6	7	Booking.com https://www.theswaninnchiddingfold.com/	N - all year round	8.6
Pub / Hotel	The Mucky Duck, Tismans Common	21	4.7	Booking.com https://www.muckyduckinn.co.uk/	N - all year round	9
FHL - 3 Bedroom Holiday Home	Old Farm Barn, Wisborough Green	6	5	Booking.com / Cottages.com http://bit.ly/3tz4x0K	N - all year round	9.00/10
FHL - 2 & 3 Bedroom Holiday Homes	Fishers Farm Holiday Cottages	10	2	Cottages.com https://fishersfarmpark.co.uk/holiday-cottages/	N - all year round	
FHL - Glamping - Pod	The Limeburners Campsite, Billingshurst	4	3	Pitchup http://bit.ly/3g84C8o	N - all year round	
Pub / Hotel - 14 rooms	The Welldiggers Arms, Petworth	28	7.5	https://thewelldiggersarms.co.uk/	N - all year round	
FHL - 2 Bedroom Holiday Home	Stable Cottage, Wisborough Green	4	5	VRBO / Airbnb https://www.vrbo.com/en-gb/p10935759?noDates=true&uni_id=5966710	N - all year round	New - no reviews yet
FHL - 3 Bedroom Holiday Home	3 Bed Barn Conversion, Wisborough Green	6	5	VRBO https://www.vrbo.com/en-gb/p11057670?noDates=true&uni_id=6088936	N - all year round	
FHL - 3 Bedroom Holiday Home	3 Bed Cottage, Balls Cross	6	4	VRBO / Cottages.com https://www.vrbo.com/en-gb/p11154151?noDates=true&uni_id=6192716	N - all year round	
FHL - 3 Bedroom Holiday Home	3 Bed Cottage, Balls Cross	6	4	VRBO	N - all year round	4.79/5

				https://www.vrbo.com/en-gb/p6772674?noDates=true&uni_id=3949501		
FHL - 2 Bedroom Holiday Home	The Stables, Northchapel	4	7	VRBO https://www.vrbo.com/en-gb/p10926474?noDates=true&uni_id=5957422	N - all year round	5.00/5
FHL - 6 Bedroom Holiday Home	6 Bedroom Barn, Plaistow	12	2	VRBO / Cottages.com https://www.vrbo.com/en-gb/p8878992?noDates=true&uni_id=4944236	N - all year round	5.00/5
FHL - 5 Bedroom Holiday Home	Five Bedroom Burningfold Barn,	10	3.8	VRBO / Cottages.com https://www.vrbo.com/en-gb/p6710507?noDates=true&uni_id=3886798	N - all year round	4.8/5
FHL - 1 Bedroom Holiday Home	The Rose Cottage, Wisborough Green	2	5	Booking.com http://bit.ly/3UFIAJg	N - all year round 9.8/10	
FHL - Glamping - Shepherds Huts	The Bat & Ball Pub / Oakfields Camping	8	2	https://www.haywards-batandball.co.uk/camping	N - all year round	
Pub / Hotel	The Crown Inn, Chiddingfold	10	5	Expedia http://bit.ly/3EyKAx4	N - all year round	
Pub / Hotel	The Mulberry Inn, 3 rooms	6	6.4	https://themulberryinn.co.uk/rooms/	N - all year round	
Lythe Hill Hotel, Restaurant & Spa	41 bedrooms, 2 suites	86	7.5	https://lythehill.co.uk/	N - all year round	4
Pub / Hotel	The Stonemasons Inn, Petworth	11	6.4	http://bit.ly/3UWNTn7	N - all year round	
FHL - 1 Bedroom Holiday Home	The Old Stable, Dunsfold	2	5.5	Airbnb http://bit.ly/3UOZoNA	N - all year round	4.96/5

FHL - 2 Bedroom Holiday Home	Cottage, Dunsfold	5	5.4	Airbnb http://bit.ly/3EAh0Ya	N - all year round	New - 1 review
FHL - 1 Bedroom Holiday Home	Guest House, Dunsfold	2	5.4	Airbnb http://bit.ly/3g90MvO	N - all year round	4.94/5
FHL - 1 Bedroom Holiday Home	Flat, Dunsfold	2	5.5	Airbnb http://bit.ly/3X4df4x	N - all year round	5.00/5
FHL - 2 Bedroom Holiday Home	The Coach House, Dunsfold	4	6	Airbnb http://bit.ly/3UXw1sn	N - all year round	5.00/5
FHL - Glamping - Shepherds Hut	Shepherds Hut, Kirdford	2	3.9	Airbnb http://bit.ly/3TzIK4t	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	Grade II Bothy, Wisborough Green	2	5	Airbnb http://bit.ly/3Ew4Ak7	N - all year round	4.95/5
FHL - 1 Bedroom Holiday Home	Annex Apartment, Wisborough Green	2	5	Airbnb http://bit.ly/3X7xNcv	N - all year round	5.00/5
FHL - 1 Bedroom Holiday Home	The Reading Rooms, Wisborough Green	2	5	Airbnb http://bit.ly/3UGbFnU	N - all year round	4.92/5

20. Appendix B

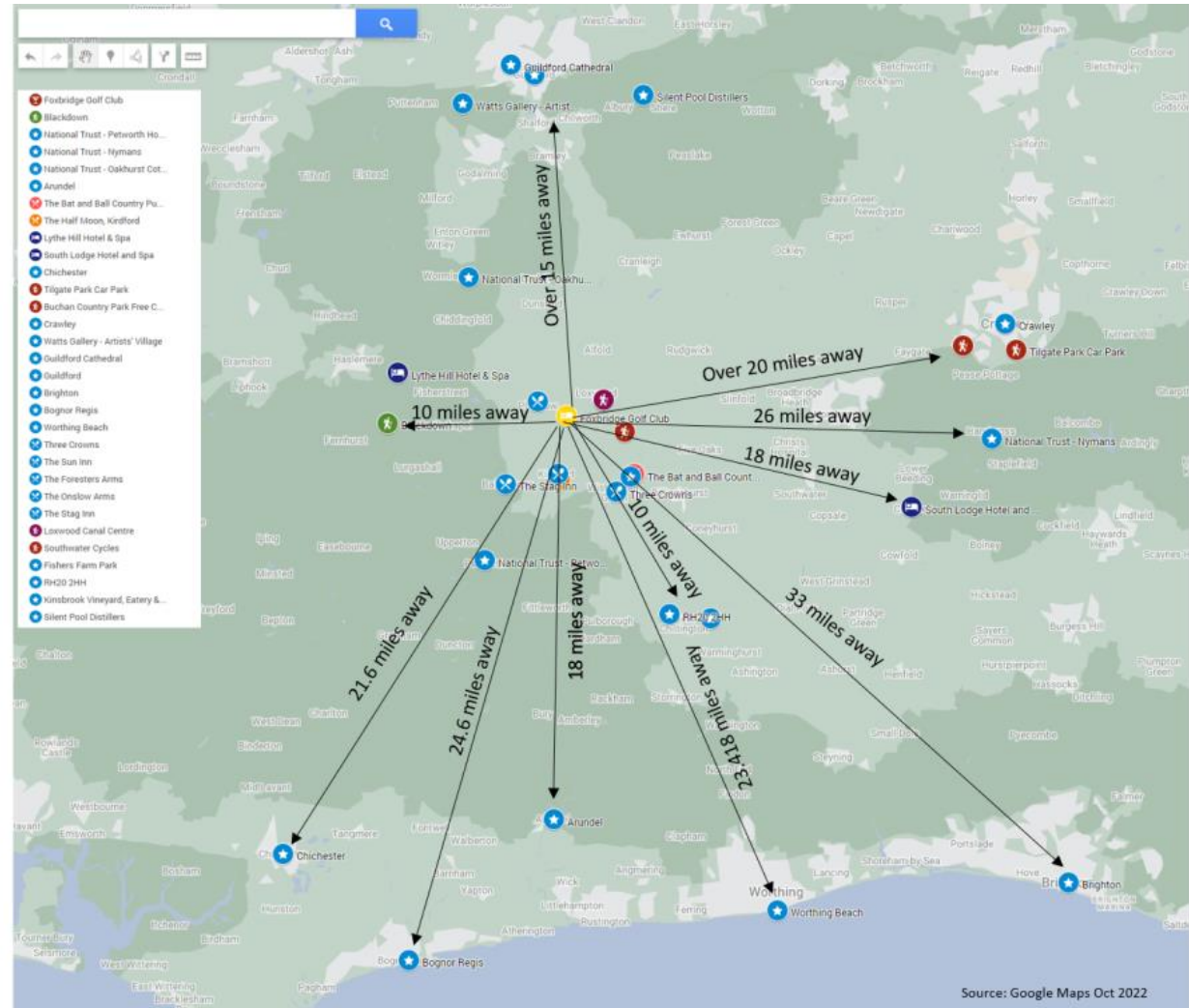
Attractions Table and Map

This site is not well located for the visitor attractions it is hi-lighting in the Design & Access Statement and at Table 5 in the Transport Assessment. It will result in a high use of cars for day trips out to access them, generating many return journeys over 20 miles in distance in addition to the arrival

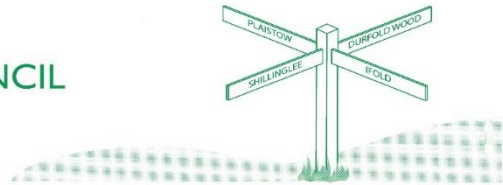
- Other than local pubs and 2 attractions all other attractions are over 10 miles away from the site
- National Travel Survey shows that for any distance over 1 mile the car is the most frequent mode of transport

Attractions Referenced by Applicant

Place	Type	Distance Miles	Driving Time Mins	2-way miles
Sun Inn Pub	Pub/Restaurant	1.7	4	3.4
Onslow Arms	Pub/Restaurant	2.1	4	4.2
Loxwood Canal centre	Attraction	2.1	5	4.2
Forrester Arms	Pub/Restaurant	2.3	5	4.6
Half Moon Pub	Pub/Restaurant	2.5	5	5.0
Stag Inn	Pub/Restaurant	3.9	7	7.8
Bat & Ball Pub	Pub/Restaurant	4.3	7	8.6
Fishers Farm Park	Attraction	4.4	7	8.8
3 Crowns Pub	Pub/Restaurant	4.7	8	9.4
Lythe Hill Hotel & Spa	Hotel/Spa	7.7	15	15.4
Petworth House	Attraction	8.5	20	17.0
Blackdown	Outdoor	10.0	22	20.0
Nyetimber Vineyard	Vineyard	10.3	19	20.6
Oakhurst Cottage	Attraction	10.5	20	21.0
Kinsbrook Vineyard	Vineyard	11.0	18	22.0
Silent pool Distillers	Attraction	14.9	32	29.8
Guildford	City	15.5	36	31.0
Guildford Cathedral	Attraction	15.6	36	31.2
Watts Gallery	Attraction	17.5	32	35.0
Arundel	City	18.0	31	36.0
South Lodge Hotel & Spa	Hotel/Spa	18.0	33	36.0
Buchan Country Park	Outdoor	19.4	37	38.8
Crawley	City	20.2	38	40.4
Chichester	City	21.6	42	43.2
Tilgate Park	Outdoor	21.8	42	43.6
Worthing	Seaside	23.4	44	46.8
Bognor Regis	Seaside	24.6	46	49.2
Nymans	Attraction	26.0	48	52.0
Brighton	Seaside	33.0	60	66.0



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