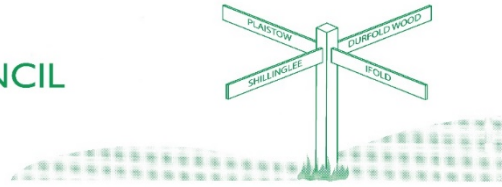


PLAISTOW AND IFOLD PARISH COUNCIL



3rd October 2022

Ms. Jo Bell
Senior Planning Officer
Chichester District Council

Sent via email: jbell@chichester.gov.uk

Dear Ms Bell,

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

Plaistow and Ifold Parish Council considered Planning Application 22/01735/FULEIA at a public meeting on 27th September 2022.

The Parish Council **STRONGLY OBJECTS** to this application for a range of reasons; however, in this letter, the Parish Council sets out its objections based on the traffic and road safety aspects of the proposals only.

The Parish Council will further respond to this application no later than 11th October, as agreed with Ms. Martin.

Plaistow and Ifold Parish Council has instructed SW Transport Planning Ltd to support its consideration and analysis of the transport aspects of this application.

Please find attached to this letter: -

- Transport Technical Note, Review of Transport Impacts – SW Transport Planning Ltd
- Crouchland Biogas Appeal Decision

Policy 39, Transport, Accessibility and Parking
Summary
<ul style="list-style-type: none">○ The proposals conflict with Policy 39 as it cannot meet ALL the required criteria.○ The proposals conflict with Policy 8 and NPPF 110 – the development has not been designed to minimise the need for travel and does not offer appropriate opportunities to promote sustainable transport modes.

- The development is not designed to minimise additional traffic generation and movement, which is illustrated by the number of car-parking spaces propose - 390 car parking spaces and 126 HGV/ Horsebox spaces and unspecified overflow parking.
- The development seeks to create an ‘out-of-town’ style commercial hub, attracting national, regional and district wide visitors.
- Sustainable transport methods – walking, cycling, public transport - are not compatible with the proposed use/users of the site.
- The rural inaccessibility of the area is recognised in Policy 25 as well as in various LPA decisions and Planning Inspector dismissed appeals.
- The proposed plans for the site conflict with strategic objectives 3.24 regarding mitigating the impact of development on climate change.

1. In accordance with Chichester Local Plan strategic objectives 18.1, *“it is necessary to consider the impact of any new development on the existing transport network, how it links to the network, impacts on highway safety...”*
2. In accordance with Policy 39, *“planning permission will be granted for development where it can be demonstrated that **all the following criteria** have been considered [...] development is **located and designed to minimise additional traffic generation and movement and should not create or add to problems of safety, congestion, air pollution, or other damage to the environment”**”.*
3. In accordance with Policy 8, the Local Planning Authority will *“ensure that new development is well located and designed to minimise the need for travel, encourages the use of sustainable modes of travel as an alternative to the private car...”*
4. In accordance with NPPF para 110 *“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location”*.
5. The proposed uses for the site have not been “designed to minimise additional traffic generation and movement” in the area. The plans seek to develop an ‘out-of-town’ style commercial venue, which will attract visitors from across the district, region, and country e.g., to utilise the *“world Class”* equestrian facilities that offer *“a competition venue circuit [...] to rival those available in Europe”*, glamping and wedding venue and other proposed users such as employees, customers, students, third-party businesses seeking conference facilities etc.
6. Setting aside the predicted Traffic Assessment, which is considered below, the requirement for 390 car parking spaces and 126 HGV/ Horsebox spaces and unspecified overflow parking demonstrates a high level of traffic generation and movement in what is acknowledged by the Applicant to be a rural tranquil area.
7. The deeply rural nature of the site, away from population centres and A and B roads, means that the proposals are at odds with Policy 8, Policy 39, NPPF 110 and Chichester Local Plan strategic

objectives 3.24 regarding mitigating the impact of development on climate change, in that it can only be accessed via use of car/van/lorry.

8. As highlighted by the Planning Inspector when dismissing the biogas Appeal, it is not possible for the road network to be improved sufficiently enough to sustain the level of traffic generation and movement. In that Appeal, the appellants had offered to carry out localised road widening in Foxbridge Lane to make it easier for large vehicles to pass one another. The Planning Inspector stated at para 60: *"... from what I saw on my site visit and from a study of the proposed widening measures, I conclude that the suggested changes would not result in any significant improvement to the free flow of traffic in Foxbridge Lane or contribute to the safety of pedestrians and riders to any meaningful degree"*. At paragraph 61 of the Appeal Decision, the Inspector states: *"In such circumstances, the build-up of traffic would still prove to be at best, frustrating and, at worst, unsafe, particularly for those on foot, bicycles or horses"*. At Paragraph 63, the Inspector stated: *"the improvements would cause a degree of harm to the rural character of this country lane through the loss of roadside trees and the additional areas of hard surfacing"*. These points led the Inspector to the overall conclusion on the proposed carriageway widening, in paragraph 116 of the decision, that *"I am not persuaded that these would be enough to fully mitigate the problem of large vehicles passing on the narrow roads"*.
9. Many of the local planning appeal decisions in this area have identified the main issue as being the effect of even relatively minor developments on the character and appearance of the area and the sustainability of such developments due to the limited accessibility of the road network.
10. Policy 25 recognises the accessibility issues in the rural Northern Part of the Plan Area and the constraints on development in the area for this reason and the limited public transport serving the area.
11. Policy encourages development that can be accessed by sustainable means of transport. The application site is in a remote area being away from population centres with the only realistic means of access for the vast majority of potential users being by motor transport. Access to the site is via narrow and single-track country lanes.
12. As highlighted by WSCC Highways, in its consultation response dated 9 September 2022, pedestrian, cycle, and public transport options to access the site are significantly restricted: -
 - *"Pedestrian access to the site is limited. The southern extent of Plaistow is located within a 2km walking distance. Given the size of Plaistow it is unlikely that a significant level of staff / visitors would walk to the site."*
 - *"Plaistow, Ifold and Kirdford are located within a 3km cycle distance, no cycle facilities are provided in the local area..."*
 - *A single [bus] service operates on a Monday and Thursday past the site. The level of service would not provide a viable option for travel to the site."*

13. Considering the above, it is not possible for the development to meet the policy requirement that it *“can be accessed by sustainable modes of transport, in part, through the creation of links between new development and existing pedestrian, cycle and public transport networks”*. Consequently, the application cannot meet ALL the Policy 39 requirements, which is essential for granting permission.
14. It is key to consider the following matters when assessing the application against transport policy: -
- Users of the equestrian centre will not be travelling by foot, bike, or public transport (126 HGV/ Horsebox spaces)
 - A “world class” equestrian facility, to rival those available in Europe will attract eventers and spectators from across the district, region, and country; these visitors will not be travelling by foot, bike, or public transport (390 car parking spaces and unspecified overflow parking)
 - Glamping holiday makers will not be arriving via foot, bike, or public transport.
 - Wedding venue guests will not be arriving via foot, bike, or public transport.
 - Given the small sizes of the surrounding villages and the average age of the population, most students accessing the proposed educational facilities will be coming from outside the local area and therefore will not be arriving via foot, bike, or public transport.
 - 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 (working in the café / bar / domestic staff for glamping and wedding venue / stable hands – please see point 15 below regarding an article concerning the current challenges faced by the equestrian industry due to lack of available staff) the vast majority of 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. They will not be arriving via foot, bike, or public transport.
 - The local area is unlikely to have enough artisan entrepreneurs to utilise the various commercial units for Ironworkers / Microbrewers / Woodworkers / Jewellers etc and so these people will not be arriving via foot, bike, or public transport.
 - The Applicant’s Framework Travel Plan (FTP) refers to the funding of a dedicated minibus for the development. Paragraph 8.4.4 of the FTP states that the minibus “will be available for facilitating group travel to the site from establishments such as local schools, colleges, or care homes”. However, there is no indication that it would be available for employees for work journeys or for shoppers or general visitors to other on-site facilities. Given the disparate nature of the various users of the site, extending the use of the minibus to other users would be impossible to implement. Its provision therefore offers no meaningful benefit in terms of reducing traffic generation.
15. To illustrate the above point regarding the areas high cost of living and the likely availability of suitable staff required at the Site, the Parish Council respectfully draws the Planning Officer’s attention to the following article, recently published which relates to the current period of commercial uncertainty of equestrian centres in terms of sustainable staffing.

- 'Without staff, we have no business': change needed to ensure a sustainable workforce, Horse & Hound, 8th March 2022:

<https://www.horseandhound.co.uk/news/without-staff-we-have-no-business-change-needed-to-ensure-a-sustainable-workforce-779616>

* A key topic at the National Equine Forum on 3 March

* British Horse Society (BHS) Chief Executive said the equestrian industry is facing a "talent crunch" - **skills shortage is across the board.**

* A recent survey found that **more than half the vacancies advertised in the past year**, offering an average salary of £24,000 and crucial to running a successful equestrian business, **went unfilled.**

* "We can't get instructors, **yard team, grooms** or riders,"

* Lucy Katan, Executive Director of the British Grooms Association and Equestrian Employers Association (EEA), added "every survey we do shows **about 40% of people are paid below the minimum wage**".

* In a recent EEA survey, 71% of employers said they do not think their businesses will cope with this and next year's increases in the minimum wage. The 6.6% 2022 rise will mean an annual pay rise of £1,380.60 for a groom working 45-hour week.

* "85% said they'd have to consider putting up livery fees, and 38% were concerned their businesses would no longer be viable," Ms Katan said. "Most comments showed real concern about business viability; some said clients don't fully understand the financial challenges of running an equestrian business."

16. The degree of traffic movement the proposed users/uses will require – as illustrated by the proposed parking requirements for the scheme - will result in a loss of tranquillity and reduced residential amenity in the area. It must be noted that all these factors were important considerations for the Planning Inspector, when dismissing the Biogas appeal.

17. The adverse impacts of traffic on the local highway network and safety concerns arising from walkers and riders meeting large lorries on roads with no pavements were key considerations of the Planning Inspector when dismissing the Biogas Appeal (Appendix C, Ref. paras 68 to 71 of the decision). For similar reasons, the proposed development conflicts with Policy 39 of the Local Plan which, amongst other things, requires development to be located to minimise additional traffic generation and not to create or add to problems of safety, congestion, or damage to the environment.

TRAFFIC CONSIDERATIONS

Relevant policies

CLP 8, 39, 25, 45

NPPF 105 and 110

Section Summary

- The Applicant's vehicle trips analysis for the development excludes several stated uses that would increase the overall number of vehicle trips made to and from the site e.g., weddings, infrequent equestrian events, supplier trips associated with food & retail and equestrian care.
- The distribution of development trips is based on existing turning proportions at junctions, which does not reflect a future reality that building a destination venue at the location will significantly change the existing turning proportions.
- Most proposed uses/users of the site - but particularly the Equestrian Centre, Farm Shop and Glamping - are **destination venues**, which will require many people to travel to Crouchlands Farm from a wide area beyond anything ordinarily considered 'local'.
- The required amount of 'travel' associated with the proposals (competitors, spectators, staff, deliveries, holiday makers, services, students, third-party personnel of 'office units', customers, guests – not an exhaustive list) would breach Policy 39, which seeks to "minimise the need for travel".
- The site is located in a rural area, remote from main roads and population centres, with insufficient public transport connectivity and no suitable pedestrian or cycle infrastructure.
- Sustainable transport methods – walking, cycling, public transport - are not compatible with the proposed use/users of the site e.g., equestrian and holidays.
- The proposals conflict with CLP Policies 8, 25, 39 and 45; and NPPF 105 and 110 – the development has not been designed to minimise the need for travel and does not offer appropriate opportunities to promote sustainable transport modes, nor does it conserve or enhance the rural character of the area. There are no suitable or practical mitigation solutions that would make the development acceptable.
- The significant increase in vehicles and particularly HGVs to the site represent highway safety issues for other users, (cars, pedestrians, horse riders, cyclists).
- The Applicant's traffic figures indicate a net increase of 757 (including 29 HGV) vehicle movements per day, with around 80 vehicle movements per hour during peak periods on weekdays. For weekends the equivalent figures are 1084 (including 320 HGV) vehicle movements per day.
- The Planning Inspector at the Biogas Appeal found that the number of proposed vehicle movements (11,212 per annum [equivalent to an average of 33 vehicle movements per day] with 14 - 46 HGVs per day) represented unacceptable traffic impact and safety issues for other road users and was a reason for refusal.
- The Applicant's proposal is for **significantly more vehicle movements** than the Biogas application.
- The development will result in major adverse traffic impacts, will adversely affect the tranquil rural character of the area and be detrimental to residential amenity.

18. Trip Generation: The Applicant's vehicle trips analysis for the development excludes a number of uses that would increase the overall number of vehicle trips made e.g., weddings, infrequent equestrian events, supplier trips associated with food & retail and equestrian care.
19. Rural Enterprise scheme: The Applicant states that there is no inclusion of trips associated with the Rural Enterprise Centre occupiers at weekends.
20. Food Retail/ Retail: Insufficient information has been provided within the application documents regarding trips associated with suppliers to the food retail and other retail outlets. The Applicant states that the Food Retail will showcase food from across West Sussex, which will need to be delivered. Any fresh foods will require frequent deliveries. Many farm shops now also supply direct to consumers via couriers (e.g., McKees in Ulster, which is used as a comparative for trips, deliver 6 days a week). It is not clear if such deliveries are included in the vehicle movement figures.
21. The Food and Retail element is expected to generate 35 permanent full-time equivalent jobs. Nevertheless, the Applicant has failed to provide any details about the vehicle movements associated with staff in the vehicle trip rates. It would be common sense to assume that staff would arrive to work prior to the public opening times and leave sometime after the site has been closed to the public. Appendix J of the Applicant's Transport Assessment indicates only 16 vehicle arrival trips on weekdays, prior to 9am. The forecasts also show 6 departure trips before 9am, which suggests these trips are not staff related. This level of traffic movement is incompatible with the assertion that there will be 35 FTE staff.
22. Glamping: The Applicant states "*there is likely to be a small number of incoming and outgoing trips across the afternoon and evening*". These trips are said to be associated with guests exploring the area and going out for dinner etc (TA para 8.5.5).
23. However, in their operational statement the Applicant states that the glamping accommodation seeks to utilise the Farm's location to offer high quality visitor accommodation for visitors to access external sites many of which will need to be accessed by vehicles.
24. The Applicant lists the Wey & Arun canal (3 miles), Southwater Country park (16 miles), Fishers Farm (6 miles), Hollycombe Steam Fair (16 miles), Cowdray ruins (14 miles), Bignor Roman Villa (14 miles), Nyetimber (11 miles); Ashling Park (25 miles) & Tinwood Vinyards (18 miles), Goodwood (20 miles).
25. It is a reasonable common-sense assumption that holidaymakers and guests will make multiple vehicle trips out during their stay.
26. Hardnips Barn: The Applicant has assumed infrequent use of Hardnips Barn as a wedding and events venue, but notes that such events could attract 100 guests and 15 staff (TA para 8.5.7).

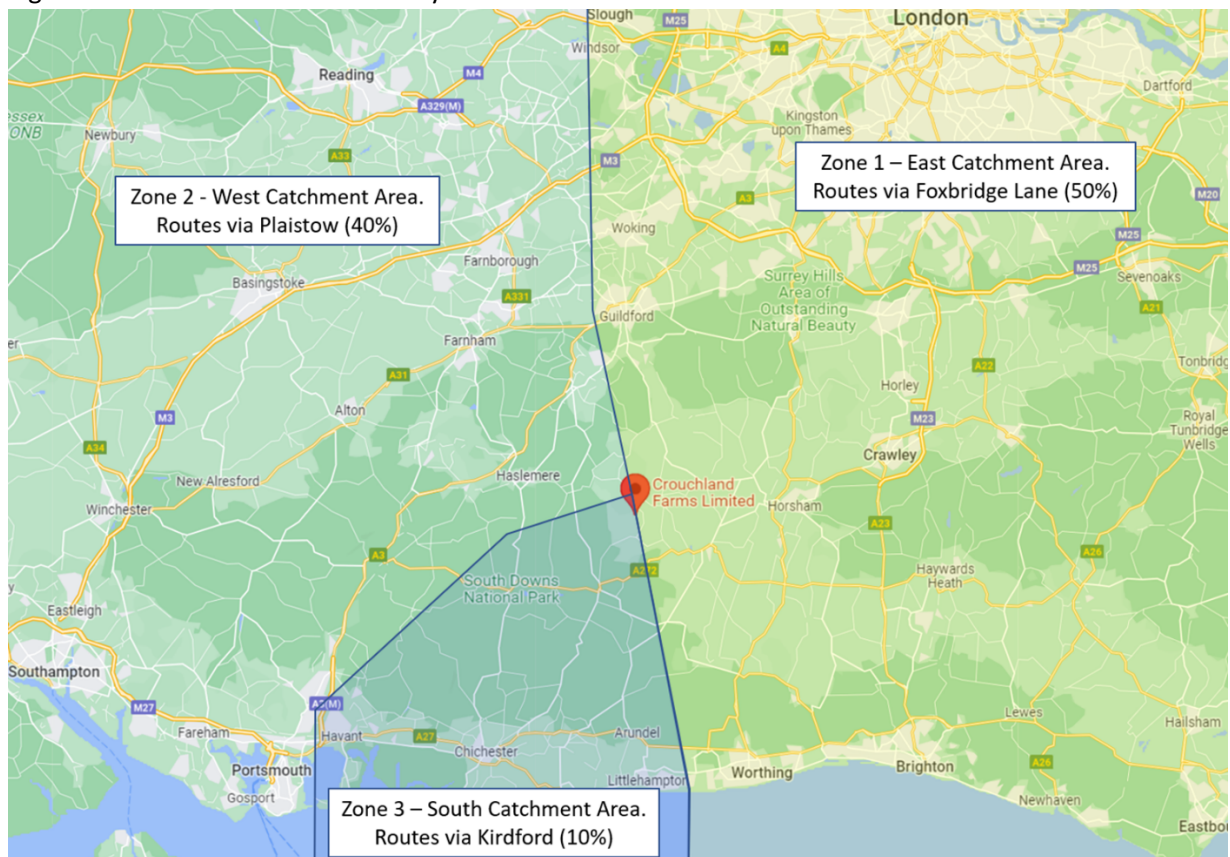
The vehicle trips associated with the wedding venue are not included in the Glamping trip generation figures, nor are they included in the overall development trip numbers.

27. The Applicant has not provided any definition of the term 'infrequent'. Therefore, there is no means of estimating the total number of trips associated with weddings and other events across the year. It is a reasonable common-sense assumption that such events could become popular – otherwise, why else create a wedding venue at the site - and therefore more frequent, which would have a significant impact on the local area, particularly in relation to weekend traffic on the local roads.
28. Equestrian: It appears from the Applicant's Transport Assessment that no allowance has been made for staff numbers within the trip analysis for the equestrian centre. Similar comments apply in respect of trips by suppliers such as farriers, vets, feed deliveries etc.
29. The Applicant states that 20 vehicle movements per day (10 arrivals and 10 departures) will be generated on weekdays (TA Table 8-9), but as noted above this excludes staff and servicing trips. Significantly higher traffic flows are expected for weekends where 400 vehicle movements per day (200 arrivals and 200 departures) are expected, of which 160 would be horseboxes or trailers (TA Table 8-10 and para 8.6.8). The impacts of these trips on the local road network are considered further below.
30. The Applicant has not included traffic associated with "*less frequent events such as gala evenings and clinics*" (TA para 8.6.6) as they say these will happen at most once or twice a year. However, there would be nothing to prevent these events occurring more frequently. The Applicant's ambition for the size of the Equestrian Centre and its facilities, coupled with any common-sense commercial enterprise, would endeavour to maximise the use of the facility.
31. The Applicant states that dressage and show jumping do not attract spectators (Appendix J of the TA). The Parish Council respectfully asserts that this is simply incorrect. The Parish is home to many equestrian enthusiasts – including members of the Parish Council – and can state with authority that it is quite typical for other family members and friends to come and spectate. They typically arrive in their own separate vehicles.
32. The Parish Council respectfully asks that **the Planning Officer does due diligence to independently verify the accurate attendance numbers at such events; either by contacting other similar equestrian venues or seeking information from people who attend such events.**
33. Total Combined Trip Generation: The Applicant's combined traffic forecasts, for all proposed land use, are set out in Tables 8-11 and 8-12 of the TA. These indicate a net increase of 757 (including 29 HGV) vehicle movements per day, with around 80 vehicle movements per hour during peak periods on weekdays. For weekends the equivalent figures are 1084 (including 320 HGV) vehicle movements per day, with 156 vehicle movements per hour during the afternoon peak period.

34. Given the exclusion of Hardnip's Barn traffic in the above forecasts, together with the underestimation of servicing trips and glamping day-trips, it is concluded that the combined trip generation estimates used within the TA and EIA are low and do not provide a robust basis for impact assessment.
35. Before considering the impact of these trips on the highway network it is necessary to determine the likely distribution of traffic.
36. Traffic Distribution: The Applicant has assumed that development trips will be distributed according to existing turning proportions at junctions surrounding the site. However, this assumption does not reflect a future reality that building a destination venue at the location will significantly change traffic patterns.
37. The cited (existing) turning proportions highlighted by the Applicant reflect where people need to get to at the present time. Currently, there are no major traffic attractors at Crouchlands Farm. Other than a very few number of staff no one attends the site. However, once a destination venue is built, the behaviour of traffic on the local roads will change. People will be coming from all over the area, district, region, and country to visit Crouchlands Farm.
38. A revised assessment of traffic distribution has been undertaken by the Parish Council using Google route planning software for a range of potential trip origins from areas surrounding the site. Visitors from outside the local area, attending equestrian events, weddings, glamping etc are likely to use similar route navigation aids or satellite navigation systems. Full details of the results of this analysis are set out in SW Transport Planning Ltd's Transport Technical Note.
39. The results show that that 50% of traffic will travel to and from the east of the site, travelling via the B2133, Plaistow Road and Foxbridge Lane; with 40% from the west travelling from the A3 direction via Plaistow village and Rickman's Lane; and 10% to and from the south travelling through Kirdford village. This is illustrated in Figure 1.

Please refer to page 10, for Figure 1.

Fig. 1 – Traffic Distribution Summary



40. This contrasts significantly with the Applicant’s forecasts, which indicate approximately 5% to 13% to the east, 35% to 55% to the west and 33% to 60% to the south (further details in the Transport Technical Note).
41. Assessment of Traffic Impacts: The Applicant’s own assessment of traffic impacts are set out in the TA and EIA reports accompanying the planning application.
42. The TA focusses on peak hour junction capacity assessments at various junctions surrounding the site, although Junction 4 (Plaistow Road/Foxbridge Lane) and Junction 5 (Vicarage Hill/Plaistow Rd), both located to the east of the site, were excluded from the assessment (TA Table 9-3). Given the revised traffic distribution results above, these junctions should now be reconsidered.
43. The EIA assesses changes in traffic flow and traffic composition on the routes serving the site and considers the resulting impacts in terms of environmental factors including severance effects and pedestrian/cyclist amenity.
44. The Applicant’s own assessment shows some very significant traffic increases on both weekdays and weekends. These are summarised in Table 8-10 and 8-11 of the EIA and show a 95% increase in weekday daily traffic flows (all vehicles) and 328% increase in HGVs on Rickman’s Lane. The equivalent increases at weekend are a 138% (all vehicles) and 3,621% for HGVs.

45. The Applicant's estimates for Foxbridge Lane are a 6% increase in weekday daily traffic flows (all vehicles) and 17% increase in HGVs. The equivalent increases at weekend are a 9% (all vehicles) and 188% for HGVs. However, due to the inaccurate traffic distribution methodology used by the Applicant, the true impacts on Foxbridge Lane will be considerably greater.
46. The Parish Council's revised analysis of trip distribution demonstrates that Foxbridge Lane will become the main access route for traffic arriving from the east and this has implications for the levels of impact reported in the EIA. Revised forecasts for traffic changes on Rickman's Lane and Foxbridge Lane are summarised below, full details are contained in the Transport Technical Note. The revised forecasts also consider Weekdays, Saturdays and Sundays separately rather than adopting the Applicant's 7-day average flows.

Fig 2 - Daily Traffic Flow Increases

Location	Day	2027 Base		Development		% Change	
		All Veh	HGV	All Veh	HGV	All Veh	HGV
Rickman's Lane	Weekday	803	11	454	18	57%	161%
	Saturday	637	4	650	192	102%	4647%
	Sunday	564	2	650	192	115%	9293%
Foxbridge Lane	Weekday	879	14	379	15	43%	105%
	Saturday	604	3	542	160	90%	5163%
	Sunday	602	1	542	160	90%	15489%

47. This demonstrates that the impacts reported within the Applicant's EIA are under stated, particularly in relation to Foxbridge Lane.
48. Foxbridge Lane is a particularly sensitive location given its pinch-point over a small bridge on a left-hand bend, limited passing space for two vehicles, dense hedgerow vegetation, no street lighting or pavements and is regularly use by pedestrians, children, cyclists, and horse riders. Local cycling clubs regularly use this and other roads at weekends for time trials and leisure cyclists are attracted by the tranquil nature of the lanes.
49. In addition, the Parish's Scout Hut is situated along Foxbridge Lane. The Scout Hut is used every weekday by the Beavers, Cubs, Scouts, Brownies, Guides and Explorers and regularly used on an ad-hoc basis at weekends. There is no onsite parking for families dropping off and collecting their children; therefore, Foxbridge Lane regularly becomes congested and road safety for all users is compromised. Children and parents also access the Scout Hut on foot, walking within the carriageway.
50. Foxbridge Lane, and other routes serving the site, present significant issues for HGVs and large vehicles. The images below show typical vehicles likely to access the equestrian centre and

equestrian events. These would be in addition to conventional lorries involved with servicing the rural enterprise centre, retail facilities, cookery school, glamping and wedding venue.

Fig 3 - Horse Boxes at Wellington Equestrian Event, Saturday 27th August 2022



51. Other examples of typical horseboxes are illustrated in Fig 4. (please see page 13 below)

Fig 4 -Typical Horse Boxes



52. Taking account of the rural nature of the surrounding road network and absence of footways, together with the relatively low baseline traffic flows and the significant increases generated by the development, particularly large vehicles, it is considered that the proposed development will result in 'Major' adverse impact in terms of both 'Severance' and 'Pedestrian and Cycle Amenity'.

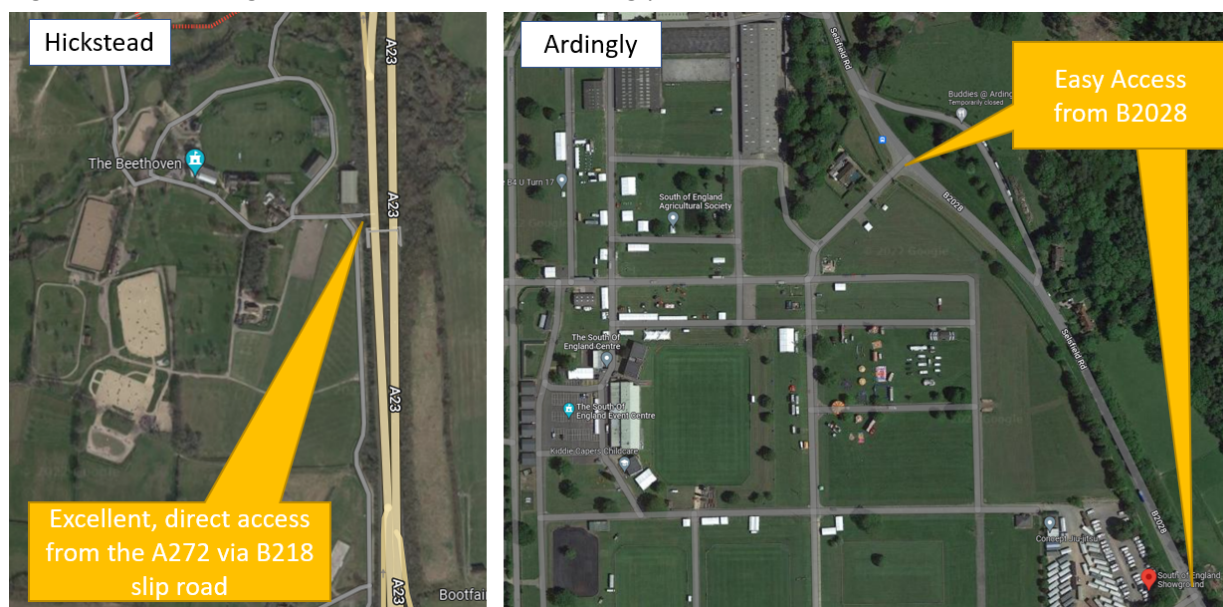
53. The impact of HGVs was a key consideration in the dismissal of the Biogas Appeal. At paragraph 68 of the decision letter the Inspector noted that *"The roads around Crouchland Farm are narrow country lanes where traffic is likely to be restricted to use by residents, the farm enterprise and occasional delivery vehicles and persuasive evidence was given by local residents on the fear to safety caused through meeting a large lorry when walking on a road with no pavement or when riding a horse or bicycle on the carriageway"*.

54. This led the Inspector to conclude at paragraph 70; *"On roads where HGV movements are the norm and other levels of traffic are relatively high, an increase similar to the numbers proposed here might not be significant or readily discernible. However, that is not the case on these*

country lanes where one would not usually expect to encounter any significant numbers of large vehicles”.

55. The Biogas plant was estimated to generate an average of 33 HGV movements per day. In this case, the amount of HGV traffic is similar on weekdays (29 HGVs) but significantly greater at weekends (320 HGVs). This is more than eight times greater than the daily HGV traffic levels considered unacceptable in the Biogas Appeal decision.
56. The inspector considers the noise and disturbance from passing traffic at paragraph 75, stating *“in this rural situation, impacts on the tranquillity, increased levels of intimidation and reduced residential amenity are experienced every time a HGV passes. The noise levels created might not, when averaged out, amount to a significant overall increase, but when disturbance is caused even 2 or 3 times an hour each time an HGV passes a property it can soon prove annoying and eventually debilitating to those experiencing it”*. Thus recognising that even relatively low hourly increases in HGV flows will have an unacceptable adverse impact in rural areas where background traffic volumes are relatively low. This has particular relevance to the properties on Rickman’s Lane, Foxbridge Lane and through the conservation area at Plaistow, and also for walkers and riders using these routes.
57. The proposed Equestrian Centre is the main generator of HGVs. A review of 12 other nearby equestrian venues confirms that they are all located within close proximity to good quality roads, with the majority having direct access onto A class roads. Examples from Hickstead and Ardingly are shown below. Full details are contained in Appendix D.

Fig 5 – Access Arrangements at Hickstead and Ardingly



58. At the Biogas Appeal, the Appellants had attempted to mitigate the adverse impacts on Foxbridge Lane by offering to install passing bays, but this was shown in evidence to be ineffective, leading the Inspector to conclude at para 60 of the Decision Letter *“the suggested*

changes would not result in any significant improvement to the free flow of traffic in Foxbridge Lane or contribute to the safety of pedestrians and riders to any meaningful degree". The Inspector also stated at para 63 that "the improvements would cause a degree of harm to the rural character of this country lane through the loss of roadside trees and the additional areas of hard surfacing". These points led to the overall conclusion on the proposed carriageway widening, in para 116 of the Decision Letter, that "I am not persuaded that these would be enough to fully mitigate the problem of large vehicles passing on the narrow roads".

59. The final conclusion of the Inspector, on traffic matters, is set out in paragraph 115 of the decision, which states *"I have also found that the vehicle movements would prove dangerous to other road users and disturbing to local residents. The noise and vibrations from traffic would be unacceptable in this rural location and detrimental to the character of the area, thereby conflicting with Development Plan Policies"*.
60. The limitations of the rural road network were also a key factor in the planning permission granted for the change of use of Foxhanger Barn, Foxbridge Lane, for offices and storage of goods (**Application Ref PS/10/02558/FUL**). It was deemed necessary to restrict the size of vehicles accessing the site and the operating hours of the use, for highway safety and residential amenity reasons. Planning condition No 5 placed a weight limit on vehicles as follows: *"No vehicle of a size greater than 7.5 tonnes shall be allowed to access the site in relation to the business hereby permitted"*. Condition No 3 restricted operating hours as follows: *"The premises shall not be used except between the hours of 08.00 and 18.00 Mondays to Fridays and between the hours of 09.00 and 13.00 on Saturdays and at no time on Sundays, Bank Holidays and other Public Holidays without the prior agreement in writing of the Local Planning Authority"*.
61. The above planning conditions reflect the sensitive nature of the rural area, notably Foxbridge Lane. The same protection is needed in respect of the current development proposals, but would be impractical, as it would preclude the majority of the proposed uses. This highlights the fact that there are no practical options for mitigating the adverse impacts of the development to an acceptable degree.
62. Transport Sustainability: Most of the proposed users/uses of the site – but particularly the Equestrian Centre, Farm Shop and Glamping - are destination venues, which will require many people to travel to Crouchlands Farm from a wide area beyond anything ordinarily considered 'local'.
63. The proposed uses for the site include Light Industrial Units / Educational Accommodation / Laboratories / Conference Facilities / Office Units / Food Producers / Bakers / Ironworkers / Woodworkers / Jewellers and Craftsmen. The types of persons and journey purposes attracted to the development include:
 - Equestrian competitors
 - spectators
 - staff

- deliveries
 - holiday makers
 - services
 - students
 - third-party personnel of 'office units'
 - customers
 - guests
- (not an exhaustive list)*

64. As highlighted in the WSCC Highways consultation response dated 9 September 2022, pedestrian, cycle, and public transport options to access the site are significantly restricted:

- *"Pedestrian access to the site is limited. The southern extent of Plaistow is located within a 2km walking distance. Given the size of Plaistow it is unlikely that a significant level of staff / visitors would walk to the site."*
- *"Plaistow, Ifold and Kirdford are located within a 3km cycle distance, no cycle facilities are provided in the local area..."*
- *A single [bus] service operates on a Monday and Thursday past the site. The level of service would not provide a viable option for travel to the site."*

65. Considering the above, it is not possible for the development to comply with sustainable transport objectives of minimising the need to travel and offering a range of sustainable travel modes.

66. Cumulative Traffic Impacts: A planning application for the redevelopment of the former Golf Club site in Foxbridge Lane is currently under consideration by Chichester District Council (Ref 22/02346/OUT). Proposals for the 60 acre site include 121 holiday units; a spa facility including a gym, swimming pool and 50 bed accommodation; a farm shop and restaurant.

67. This was submitted after the current Crouchlands Farm planning application and has not been considered in the Applicant's traffic impact analyses. The Transport Assessment for the Foxbridge Golf Club Site shows that the daily trip generation is expected to be 667 vehicle movements per day on weekdays and 737 vehicle movements per day at weekends. This represents a very significant increase in traffic in Foxbridge Lane and other routes serving both this and the Crouchlands Farm development. The cumulative impact of the two proposals is a material consideration for the determination of both applications, yet no such assessment has been provided by either developer.

68. The transport assessments for both sites need to be updated to include cumulative impact analyses before any decisions on either planning application can be made.

69. Transport Conclusions: The proposals would introduce a major new traffic generator in a location remote from main roads and reliant on country lanes for access. There is no credible

public transport option and no suitable pedestrian or cycle infrastructure to enable sustainable transport to the development.

70. The Applicant's trip generation forecasts omit some of the proposed uses, others are under estimated and the traffic distribution assumptions have been shown to be unreliable and inaccurate.
71. The increases in traffic, particularly large vehicles, on local roads have been shown to be very substantial, resulting in major adverse impacts.
72. In view of this, the proposals conflict with the following policies of the Chichester Local Plan (CLP) and the National Planning Policy Framework (NPPF).
73. Policy 8 requires that *"new development is well located and designed to minimise the need for travel, encourages the use of sustainable modes of travel as an alternative to the private car..."*.
74. Policy 25 discusses provision for *"small scale development in the North of the Plan area"* and requires that developments *"conserve and enhance the rural character of the area, the quality of its landscape and the natural and historic environment"*.
75. Policy 45 considers development in the countryside stating *"development will be granted where it requires a countryside location and meets the essential, small-scale, and local need which cannot be met within or immediately adjacent to existing settlements"*.
76. Policy 39 requires that *"Development is located and designed to minimise additional traffic generation and movement, and should not create or add to problems of safety, congestion, air quality, or other damage to the environment"*. It is also a requirement that *"The proposal encourages development that can be accessed by sustainable modes of transport"*.
77. NPPF paragraph 110(a) requires that *"appropriate opportunities to promote sustainable transport modes can be – or have been- taken up, given the type of development and its location"*. Paragraph 105 of the Framework acknowledges that opportunities to maximise sustainable transport will vary between urban and rural areas but also emphasises the requirement for *"limiting the need to travel"* and *"offering a genuine choice of transport modes"*.
78. Paragraph 110(b) also requires that *"safe and suitable access can be achieved for all users"*. And paragraph 110(d) states *"any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree"*.

79. The proposed development fails to comply with these policy requirements. There are no suitable or practical mitigation solutions that would make the development acceptable. Therefore, the proposals should be refused.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Catherine Nutting', with a stylized flourish at the end.

Catherine Nutting
Clerk & RFO to Plaistow and Ifold Parish Council

Clerk & RFO: Catherine Nutting
Email: clerk@plaistowandifold-pc.gov.uk
www.plaistowandifold-pc.gov.uk
07798631410