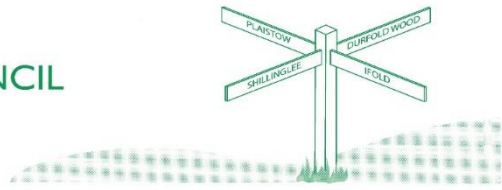


PLAISTOW AND IFOLD PARISH COUNCIL



15th November 2023

Jane Thatcher
Senior Planning Officer
Chichester District Council

Sent via email: [redacted]

Dear Ms. Thatcher,

Re: 22/02346/OUT | Outline application for 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. | Foxbridge Golf Club Foxbridge Lane Plaistow West Sussex RH14 0LB

Plaistow and Ifold Parish Council (the 'Council') notes the recent document submitted by the Policy Team.

The Parish Council understands that it is standard practice for the Policy Team to provide comment on major applications, particularly in view of the emerging Local Plan and the changing policy landscape which can impact long running applications. Nevertheless, the Council is concerned and respectfully queries the purpose, accuracy, and usefulness of the document.

The document does not neutrally highlight the relevant planning policies to be considered by the appointed senior and experienced Planning Officer, but passes comment such as a consultee. Consultees consider planning policy relevant to their area of expertise and position within the planning system and are therefore 'policy narrow' in scope. If it is necessary for the Policy Team to support a senior and experienced Planning Officer with major applications, the Team has a responsibility to accurately consider all relevant and applicable policies and provide beneficial support to the Planning Officer.

The document does not refer to the Local Planning Authority's (LPA) Pre-Application advice, the Applicant's gross departure from this advice and how current and emerging policies remain relevant. For example, policy 30 requires that new tourist development be on a scale appropriate to the location. The LPA queried the scale of 40 lodges and other facilities at the pre-application stage.

The document does not consider any relevant recent planning decisions (of either the LPA, or the Planning Inspector) which considers the 'real life' application of Local Plan policy. Nor does it look at the planning history of the site itself and consider if the policies which occasioned the dismissed Appeal (APP/L3815/W/18/3206819 | 09.05.2019) for the construction of 10 dwellings and vehicular access to replace the existing Golf Club, remain relevant and applicable to the current application.

The Parish Council respectfully submits that such signposts would be valuable to the Planning Officer.

For the document to be useful, it must be correct, and, in some instances, it is simply wrong. For example, the document states: -

*"It is noted that the applicants propose to re-use part of the existing clubhouse for the purposes of a farm shop selling locally sourced products **which would appear to satisfy the criterion under Policy 45** which stipulates that local/small scale farm shops will be permitted provided they sell goods that have **predominantly been produced on the farm.**" [own emphasis]*

The application site is not a farm. There are no proposals within the application to grow produce. Therefore, the proposed farm shop will manifestly not be selling goods that have been "*predominantly [...] produced on the farm*" – all goods will be delivered to the site, increasing the development's traffic generation within the area, which impacts upon tranquillity, rural character, road safety and sustainability. 'Predominantly' - given its ordinary meaning – is: 'mainly; for the most part'. This application fails to satisfy Policy 45 on all levels; it is plainly not small scale, does not meet a local and/or essential need and its large, incongruous scale will unquestionably have a huge impact on the landscape and rural character of the area.

The purpose of the document is confused. If it intends to highlight all relevant policies applicable to the application, it fails as it omits many such as Policies 39, 40 and 48. If it intends to comment on the acceptability, in policy terms, of the proposed development it likewise fails, as the document errs in its understanding of the application and fails to apply any relevant local knowledge about the site and the surrounding area.

The Council queries the logic of the following comment: -

"Policy 54 requires the applicants to demonstrate that alternative, accessible, replacement facilities of overall, at least equivalent, quantity and quality are provided. However, the previous permission (19/01645) granted to convert the clubhouse into a dwelling has effectively resulted in further operational use of the golf course being stifled. Consequently, it would be difficult to argue for such full re-provision at this stage."

[own emphasis]

Plainly, if the permission to convert the clubhouse into a dwelling has not 'stifled' the proposed erection of up to 121 holiday units; a spa with accommodation of up to 50 bedrooms; a restaurant and farm shop then the situation of a dwellinghouse would not prevent full re-provision as a golf course at this stage. Rather than the proposed conversion of the former clubhouse into a restaurant

and farm shop, it could be returned to a clubhouse! Arguably, a golf course would be far less impactful to the dwellinghouse, its neighbours and community and far less impactful on the landscape. In short, and with respect, this comment/observation is plainly ridiculous.

The Parish Council is sympathetic to the fact that officer time and resources are stretched. However, if it is understood that an Enforcement Officer cannot simply take a report of a breach at face value and consider the matter remotely - but needs to attend the site to see what is happening 'on the ground' - then the Policy Team should likewise fully understand what Policy 25, 39, 45 etc look like, as every area is different. This document is clearly a 'desktop study', unable to apply relevant local knowledge and understanding of the area, which is reflected in its comments which are contradictory, and, in places, wrong.

Plaistow/Ifold might be a service village, but it looks very different from any other service village in the district. For example, a simple 'google maps search' will illustrate how different Fishbourne and/or Nutbourne are when compared to Plaistow or Ifold (Policy 2) – i.e., the situation of supermarkets, train stations and the A27. Unless an Officer attends Foxbridge Lane and understand its place in the district and its relationship with the distinct and unconnected settlements of Plaistow and Ifold (they are not one place), a desktop study quoting Local Plan and other planning policy out of context is of very limited value to a senior and experienced Planning Officer.

Significantly, when applications such as this have hundreds of documents, (many of which are themselves lengthy), there would naturally be a tendency to favour shorter documents, as well as documents from experts. This document is not only short, but being from the Policy Team anyone would be forgiven for thinking that it is the definitive document to read regarding applicable policy. Consequently, this document would be given more weight than the Parish Council's consideration of planning policy. Therefore, this is a significant and influential document. The Policy Team have a very heavy burden of responsibility to get it right! If they fail, which they have done on this occasion, it has the potential to cause significant harm. There is no right of appeal for a community once the LPA has made a decision.

The Parish Council respectfully asks the Planning Officer to refer to and remind themselves of the Council's submissions dated November 2022, in which it considers relevant planning policy, including traffic and landscape and applies accurate local knowledge of the area and community to the application. The Council respectfully submits that its consideration of planning policy in relation to this application is more accurate and helpful to the determination of the matter than that produced by the Policy Team.

Yours sincerely



Catherine Nutting

Clerk & RFO of Plaistow and Ifold Parish Council

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