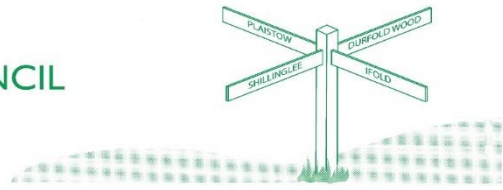


PLAISTOW AND IFOLD PARISH COUNCIL



10th October 2022

Ms. Jo Bell
Senior Planning Officer
Chichester District Council

Sent via email: jbelle@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.

The Parish Council has considered the following matters in its deliberation of this application (and notes the significant overlap between each). Please note that the following matters have been submitted to CDC separately:

- Landscape – submitted 7th October 2022
- Water Neutrality – submitted 5th October 2022
- Transport – submitted 3rd October 2022

We note CDC's letter to the Applicant dated 30th September 2022 setting out further information required by CDC in order to fully understand and assess the impacts and effect of the proposed development and that additional requests for information may follow. The Parish Council submits these representations without sight of the further information required by CDC and reserves the ability, as a statutory consultee, to prepare further representations on additional evidence and documentation submitted by the Applicant.

Table of Contents

	Matters	Page number(s)
1.	Planning Policy	3 - 26
	○ Policy 45, Development in the Countryside	3
	○ Policy 25, Development in the North of the Plan Area	12
	○ Policy 2, Development Strategy and Settlement Hierarchy	14
	○ Policy 3, The Economy, and Employment provision	16
	○ Policy 55, Equestrian Development	18
	○ Policy 40, Sustainable Design and Construction	20
	○ Policy 31, Caravan, and Camping Sites	22
	○ Policy 48, Natural Environment	24
2.	Lighting	27
3.	Heritage assets	32
4.	Relevant dismissed Planning Appeals	42
	Appendix A Prestige Alternative Finance Impairment document	
	Appendix B Equestrian Venue Provision Report Comments	
	Appendix C Racing Post article	
	Appendix D Racing Post article	
	Appendix E Crouchlands Biogas Appeal Decision	
	Appendix F Parish Council Letter to LPA 15.08.2022	
	Appendix G Parish Council Letter to LPA 15.09.2022	

1. PLANNING POLICY

This planning application must be considered and determined against the [Chichester Local Plan Key Policies 2014 – 2029](#) document.

Policy 45, Development in the Countryside

Section Summary

- The legal requirement to remediate the site under an Enforcement Notice does not constitute 'essential need'.
- Once remediating the site from its use as a biogas plant has been set aside, the Applicant has failed to provide independent evidence of 'essential need'.
- The definition of 'local' and 'local need' cannot include district, regional or national aspirations such as a "world class" equestrian facility, "to rival those available in Europe" (Equestrian Report, section 4.2 / 4.2.2) and glamping venue; both of which will routinely attract visitors from across the district, region, and country.
- The Applicant fails to provide evidence of local demand/need for food producers, bakers, ironworkers, woodworkers, jewelers, "craftsmen", office units, light industrial units, education accommodation, laboratories, or conference facilities.
- The Applicant has failed to adequately explain why any of the suggested users or uses of the site require a countryside location. In fact, a countryside location puts the application at odds with Chichester Local Plan strategic objectives 3.24, 3.25, 16.2 and 16.3.
- The proposed development is largescale and therefore does not meet Policy 45's requirement that development be small scale.
- Its size/scale puts it at odds with the requirement that it be "well related to" its situation – either in terms of established settlement(s) and/or groups of buildings and/or an existing farmstead.
- The proposed development is unrelated to the retained Farmstead. The Farmstead element is reduced to a single building. Crouchlands is a farm and small-scale diversification should support and complement the farm's primary function as an agricultural farming unit producing food.
- The Applicant has failed to provide evidence to assess the viability of the proposed farm shop or that the proposed new uses complement, rather than undermine, any viable agricultural operation of the site.
- The proposals breach policy 45.2 and 45.3 as they seek to remove most of the existing agricultural buildings from productive agricultural operations, thereby prejudicing the viable agricultural operation of the farm; and seeks to construct new buildings that are unrelated to agricultural use.
- The Applicant has not considered the impact of the proposed retail, office, light industrial and equestrian development on existing local businesses.
- Within the Biogas Appeal decision, the Inspector noted that a farm's primary purpose should be the growing of food.

1.1 The current application site is unequivocally within the countryside and outside a Settlement Boundary. Therefore, in accordance with Policy 45, the application should only be granted where it can demonstrate/meet the following policy requirements: -

- a. essential need
- b. local need, that cannot be met within or immediately adjacent to existing settlements
- c. requires a countryside location
- d. small scale
- e. must be well related to an existing farmstead or group of buildings, or located close to an established settlement
- f. complementary to and does not prejudice any viable agricultural operations on a farm and other existing viable uses
- g. local/small scale farm shops would sell goods that have predominantly been produced on the Farm.
- h. ensure that scale, siting, design, and materials would have minimal impact on the landscape and rural character of the area

Each of these essential policy requirements are considered in sequence below.

Essential need

1.2 The Parish Council asserts that the history of the site cannot be overlooked when considering this application and plays a pivotal role in defining 'essential need' and assessing this application against Policy 45. The Application appears to rely upon the legal requirement to remediate the site from its former unlawful use as a biogas plant confirmed in the 3 no Appeal Decisions reference APP/L3815/C/15/3133236, 3133237 and 3134445, as justification that the proposals meet the 'essential need' requirement of Policy 45. The limited other works highlighted within the Application, such as woodland management, are simply requirements of responsible land maintenance and management.

1.3 The Parish Council contends that **any assessment of diversification proposals for the site must begin with its only lawful agricultural use i.e., as a farm. It cannot be right that a previous unlawful use of land can become the defining basis from which to judge and decide future uses of the site/land.** It is our understanding that the landowner / Applicant is attempting to commercially recoup significant financial losses arising from the failure of the unlawful use of the land. Please see Appendix A of this letter (Prestige Alternative Finance Impairment document; particularly appendix 1 of the document).

Via a series of holding companies the ultimate owner of Crouchlands Farm is Prestige Alternative Finance Fund Limited (registered in The Cayman Islands; please refer to Appendix A of this letter and particularly, appendix 1 of the Prestige Alternative Finance Impairment document, which states "*The Fund formed Artemis Land & Agriculture and recruited a specialist management team to create a Rural Diversification Plan for Crouchlands Farm in West Sussex...*"). Prestige Alternative Finance Fund Limited is attempting to commercially recoup significant financial losses arising from

the failure of the unlawful use of the land. Clearly this approach cannot and should not be deemed 'essential need'.

Therefore, the Applicant has failed to provide any independent evidence of 'essential need', and we consider that the proposal fails this criterion of Policy 45.

Local need

1.4 Similarly, the Applicant seeks to define "local" as the whole of the Chichester District, extending to what is considered regional and possibly national, as opposed to in close radius to the site. The aspirations for an equestrian centre, described by the Applicant in the Equestrian Report as "*a competition venue circuit in the UK to rival those available in Europe*" (pg. 12, section 4.2.2) and glamping venue will routinely attract visitors from across the district, region, nationally and potentially internationally. This is clearly not meeting any 'local need' as required by Policy 45 which refers to local needs as those within or immediately adjacent to existing settlements which in this case would be Plaistow and Ifold.

1.5 The Applicant fails to provide any independent verifiable evidence of local demand/need for any of its proposals. The Applicant has not provided information/evidence regarding the local need for food producers, bakers, ironworkers, woodworkers, chefs, microbrewers, jewellers, or "craftsmen". Similarly, no evidence of local need is provided for office units, light industrial units, education accommodation, laboratories, or conference facilities. In the absence of independent verifiable evidence of local need, it is impossible to assess if these needs cannot be met within, or immediately adjacent to existing settlements.

1.6 The Parish Council has prepared detailed comments on the Applicant's Equestrian Report which are set out in Appendix B (Plaistow & Ifold Parish Council - Equestrian Venue Provision Comments) of these representations.

The Applicant's Equestrian Report contains a multitude of inaccuracies and omissions including the following :-

- Fails to identify 5 venues, which are within 1 hours drive of Crouchlands Farm.
- Fails to recognise that Chichester District / South of England has many top quality equestrian centres – both in terms of events and rehabilitation.
- There are **12 venues within an hour's drive of the Site**, which are regularly in use (Appendix B, pg. 2).
- The rehabilitation only venues near the Site, such as [Equine Aqua Training in The Haven](#), (8 miles from the Site); [Sussex Equine Hospital](#), (13 miles from the Site) and [Liphook Equine Hospital](#), (16 miles from the Site).
- Correct information regarding additional equestrian venues in the vicinity. The Applicant incorrectly claims that certain centres have closed, but they are, in fact, still operating, such as:-

- [Priory Equestrian](#) (No/. 9 on the Applicant’s map) (17 miles from Crouchlands Farm), which is used for some dressage and pony club events.
- Royal Leisure, (No/. 8 on the Applicant’s map) which is now called [Hascombe Farm Equestrian Centre](#) (22 miles away from the Site). *“Hascombe Farm Equestrian Centre, formerly the well-known Royal Leisure, ran for nearly 25 years as an established showground. In 2014, it was taken over by a private owner who updated and refurbished the centre to an exceptional standard.”* Which hosts dressage, show jumping and riding club events throughout the year, as detailed on their website calendar.
- [Petley Wood](#) (No/. 6 on the Applicant’s map) (65 miles from the Site) has events scheduled in October – December 2022.

The Applicant’s inaccurate information calls into question the credibility of the information presented within the report.

Reference by the Applicant to equestrian centres which closed 35 or more years ago (such as Stilemans (No/. 1 on the Applicant’s map), Shamley Green (No/. 2 on the Applicant’s map) and Stocklands, (No/. 11 on the Applicant’s map)) are irrelevant to the considerations, given the number of equestrian centres which are both operational and local to the proposed Site (see Appendix B, pg. 2). Similarly, referencing a closed centre 220km away (No/. 10 on the Applicant’s map, Hand Equestrian) defies logic.



- 0 Crouchlands Farm, Rickman’s Lane, Plaistow, Billingshurst, West Sussex RH14 0LE
- 1 Stilemans, Hascombe, Godalming, Surrey GU8 4AB
- 2 Shamley Green, Woodhill Lane, Shamley Green, Guildford, Surrey GU5 0SP
- 3 Mattingley Cross Country, Borough Court Road, Hook, Hampshire RG27 8JA
- 4 Quob Stables Equestrian Centre, Durley Brook Road, Durley, Southampton SO32 2AR
- 5 Peper Harrow, Peper Harrow Park, Godalming, Surrey GU8 6BQ
- 6 Petley Wood Equestrian Centre Marley Lane, Battle, East Sussex TN33 0RE
- 7 Hoplands Equestrian Centre, King’s Somborne, Stockbridge, Hampshire SO20 6QH
- 8 Royal Leisure Centre, Horn Lane, Henfield, West Sussex BN5 9SA
- 9 Priory Equestrian, Frensham Road, Frensham, Farnham, Surrey GU10 3DP
- 10 Hand Equestrian Centre, Davis Lane, Clevedon, Avon BS21 6TJ
- 11 Stocklands Show Centre, Forest Mare, Liphook, Hampshire GU30 7JQ
- 12 Medstead Grange, Lymington Bottom Road, Medstead, Hampshire GU34 5NL

(Pg. 11, Equestrian Report, 4.1.1 Map showing closed competition sites).

Therefore, it is disingenuous and misleading for the Applicant to claim that this area does not have sufficient equestrian provision and therefore there is a 'local need'.

Countryside location

1.7 Regarding the requirement for a Countryside location, the Applicant notes that *"some businesses require a rural location e.g., growing viticulture"* (Planning Statement, 106). However, there is no reference to vineyards, the growing of grapes or wine production within the application documents. The suggested uses of the site do include: -

- Food Producers
- Bakers
- Ironworkers
- Woodworkers
- Chefs
- Microbrewers
- Jewellers
- Craftsman
- Office Units
- Light Industrial Units
- Educational Accommodation
- Laboratories
- Conference Facilities

(Planning Statement 28, Operational Statement 8, Transport Statement 8.3.4)

1.8 The Applicant has failed to adequately explain why any of the suggested users or uses of the site require a countryside location. In fact, a countryside location puts the application at odds with Chichester Local Plan strategic objectives 3.24 and 3.25; to *"mitigate the impact of development on climate change by minimising greenhouse gas emission..."* and to *"conserve and enhance the distinctive character, quality and importance of the historic environment (including archaeology), local landscapes, wildlife and habitats..."* Similarly, a countryside location puts the application at odds with Chichester Local Plan strategic objectives 16.2 and 16.3, namely, *"Chichester District has a good growing climate and both the agricultural and horticultural industries are important. **Domestic food production is of strategic national importance.** Emphasis is not just on increasing self-sufficiency but also taking advantage of the UK climate to produce more food for home and export markets."* And *"Consequently, it is important to protect the best and most versatile agricultural land and to minimise its loss to development in order to safeguard this resource."*

1.9 All the proposed users/uses will require: -

- the importation of raw materials

- the exportation of finished goods/products
- the transportation of large numbers of people to and from the site.

1.10 It is not possible to consider the above sustainable. The site is in a remote location, away from population centres and A and B roads. Access to the site is via narrow and single-track roads. The only realistic means of accessing the site is by car, van, or lorry down narrow country lanes. The degree of traffic movement the proposed users/uses will require will result in a loss of tranquillity and reduced residential amenity in the area (please refer to the Landscape and Heritage Asset sections below at sections 14 and 15). It must be noted that all these factors were important considerations for the Planning Inspector, when dismissing the Biogas appeal (10.14 below).

Small scale and relationship to its situation

1.11 The Parish Council contends that a key objective in Policy 45 is the relationship to either an existing farmstead or group of buildings or located close to an established settlement. This is highlighted by the requirement that the development ***“must be well related to...”***

1.12 The proposed development is large scale and therefore does not meet Policy 45’s requirement that development be small scale. Its size/scale puts it at odds with the requirement that it be *“well related to”* its situation – either in terms of established settlement(s) and/or groups of buildings. Crouchlands Farm is outside any Settlement Boundary in open countryside – it does not abut or adjoin a Settlement Boundary and therefore cannot be considered close to/well related to an established settlement (Plaistow, Ifold or Kirdford). Additionally, its industrial, commercial, retail, and sizable “world class” equestrian aspirations means that it is not well related to any local “established settlement”. Likewise, it is not well related to the current buildings on the site, which includes a Grade II Listed Building, or in the immediate vicinity (see section 15 below regarding Heritage Assets).

1.13 The proposed development is unrelated to the retained Farmstead and none of the proposed users/uses, other than the single farm shop, supports the farming activities. The Farmstead element of the proposal is reduced to a single building being retained for agricultural use. Crouchlands is a farm and small-scale diversification should support and complement the farm’s primary function as an agricultural farming unit producing food. The effect of this proposal is that the remaining farm operation becomes subservient to the proposed industrial, commercial, retail, and equestrian activities on the site.

Viable agricultural operations / local/small scale farm shops

1.14 **The Parish Council respectfully draws your attention to its letters dated 15th August and 15th September 2022 (Appendices F and G)**, in which it sought key information – conspicuously absent from the Application – to enable effective consideration of the following fundamental matters intrinsic to Policy 45: -

- the existing (retained) Farmstead
- the function and viability of the farm shop – required by Policy 45 to be *“local/small scale”*, selling goods that have predominantly been produced on the farm

- the viable agricultural operations of the farm and other existing viable uses – to ensure that the proposals are complementary to and do not prejudice its agricultural operations

1.15 Considering the Applicant seeks to diversify away from farming and introduce many non-agricultural business activities on the site, including new tourism and leisure developments, the Parish Council notes the absence of the following information, which is required to assess the application against Policy 45: -

- An Agricultural Appraisal and Needs Assessment, to determine (among other things) the area of floor space required to provide the high welfare winter accommodation for livestock.
- The farm facilities (including farming equipment) required to enable the agricultural operation of growing/rearing, harvesting and storage of produce to adequately stock the Rural Food and Retail Centre and use in the Cafe, Cookery School, and Glamping Restaurant, as indicated in the application documents.
- An agricultural consultant's report to support the proposed minimal farming plans and whether they are viable on the site; for example, the growing of crops to sell in the proposed farm shop.
- A definition of "on site production" e.g., grown/ reared on site, or grown/ reared in other locations and brought to the site for industrial processing and packaging (please cross-reference with para 1.6 – 1.8 above).
- *"Robust and credible evidence that adequate marketing has occurred in order to support the argument that the property/land is no longer required"* for general farming purposes as the primary commercial activity of the property/land. (Appendix E, Local Plan)
- Primary evidence demonstrating commercial viability and/or demand for the various proposals. For example, there are no commercial reports from local agents/qualified valuers, or tenants / potential users supporting this scheme.
- Evidence (including the required marketing evidence under Appendix E of the Local Plan) demonstrating the commercial viability of the proposed new activities and primary evidence that there is local demand for such commercial activity.
- The Parish Council has sourced and provides the details of recent articles which relate to the commercial viability of equestrian activities. Whilst the Parish Council acknowledges that the article topics are not entirely congruent with the Applicant's aspirations for the Equestrian centre, the articles do indicate that horse husbandry, staffing and the general equestrian world is going through a time of financial uncertainty, which could impact upon the Applicant's business model. Certainly, without any evidence demonstrating commercial viability of the proposed new activities, all the LPA has to consider are published articles in respected industry related publications indicating that equestrian activity is struggling:

- *'Their future has never been more uncertain': joint bid launched to save our riding schools*, Horse & Hound, 16th March 2022: <https://www.horseandhound.co.uk/news/their-future-has-never-been-more-uncertain-joint-bid-launched-to-save-our-riding-schools-780587>
- *'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.”
- *'Trainers call for action as more yards struggle to stay afloat'*, Racing Post, 12th August 2022, Appendix C
- *'Plummeting attendance hits racing harder than other sports'* Racing Post, 12th August 2022, Appendix D

1.16 Rather than supporting the viable agricultural operations of the existing Farm, the removal of most of the existing agricultural buildings from the productive agricultural operations would in fact prejudice the viable operation of the Farm. For example, the removal of the large proportion of the existing agricultural buildings would severely restrict over wintering accommodation and remove storage facilities for bedding and feedstock etc, thereby restricting the livestock that the Farm could accommodate.

1.17 This puts the proposals in breach of Chichester Local Plan strategic objectives 16.2 and 16.3, namely, to respect and safeguard **domestic food production, which is recognised in policy as being of strategic national importance**. Crouchlands Farm was, until its unlawful development into a failed biogas plant, a working agricultural farm. In accordance with strategic objectives 16.3 ***“it is important to protect the best and most versatile agricultural land and to minimise its loss to development in order to safeguard this resource.”***

- 1.18 Within the Biogas Appeal decision (Appendix E), the Inspector noted that a farm's primary purpose should be the growing of food. Therefore, the Applicant has not demonstrated it meets Policy 45.2.
- 1.19 The Applicant proposes the removal of existing structurally sound agricultural buildings from agricultural use and seeks to construct new buildings that are unrelated to agricultural use. Therefore, the Applicant has not demonstrated it meets Policy 45.3.
- 1.20 There is concern that the Applicant has not considered the impact of the proposed retail, office, light industrial and equestrian development on existing local businesses. No evidence of such consideration has been provided. Therefore, the application has not demonstrated it meets Policy 45.2
- 1.21 The scale, siting, design, and materials would all have a major impact on the landscape and rural character of the area. Please see the Parish Council's Landscape comments in a separate submission.

Policy 25, Development in the North of the Plan Area

Section Summary

- Please cross reference this section with our Landscape comments which are submitted separately.

- The Applicant has failed to satisfy Policy 25: -
- The proposals are not small-scale.
- The proposals are not supported by an evidenced local employment need.
- The proposals conflict with Chichester Local Plan strategic objective 14.4, in that they undermine the existing local economy and do not support the local village centres by drawing patronage away from existing businesses to a stand-alone 'out of town' style multi-enterprise commercial and leisure centre.
- The proposals are not supported by either a Neighbourhood Plan and/or Site Allocation DPD, in accordance with Policies 2 and 5.
- The size and scale of the proposals - 15,169m² of new/converted non-agricultural floor space, 390 car parking spaces, 126 HGV parking spaces along with unspecified number of overflow parking spaces and 105 secure cycle shelter spaces - do not align with Policy 25 which seeks small-scale development which will *"conserve the rural character of the area, with its high-quality landscape and environment"*.
- Compliance with Policy 25 is not achieved by remediating the site from its former unlawful use as a biogas plant, in accordance with the Enforcement Notices.

2.1 Policy 25 states that provision will be made for "small-scale development" in the North of the plan area through Neighbourhood Plans and / or the Site Allocation DPD. . As outlined above, the proposals for the site are large scale and out of keeping with the area.

2.2 Chichester Local Plan strategic key objective 14.2 identifies the *"need to accommodate some small-scale development to address local housing and employment needs and support local village facilities"*. As outlined above, the proposals for the site do not meet any empirically identified / evidenced local need (either in terms of use, or in terms of employment); nor do they demonstrate how they support local village facilities. The Applicant has failed to provide any information/evidence regarding the impact of the proposals on the existing local economy e.g., shops, artisan employment, camping/glamping venues. In fact, rather than comply with strategic objective 14.4 which *"seeks to maintain the role of the villages as local service centres"*, the proposals seek to undermine the local village centres, drawing patronage away from existing businesses to a stand-alone 'out of town' style multi-enterprise commercial and leisure centre.

2.3 Another key requirement of Policy 25 is that the development has been identified in either a Neighbourhood Plan, and/or Site Allocation DPD, in accordance with Policies 2 and 5. The proposed development does not meet either of these requirements.

- 2.4 The key objectives of Policy 25 and Chichester Local Plan strategic objective 14.2 is for small scale development that will: -
- Conserve and enhance the rural character.
 - Conserve and enhance the quality of its Landscape.
 - Conserve and enhance the natural and historic environment.
 - Safeguard existing local facilities.
 - Improve accessibility to nearby facilities outside the North plan area.
- 2.5 This last requirement, as set out in Policy 25 and Chichester Local Plan strategic objectives 14.3 and 14.4, indicates that the LPA considers that centres outside of the area (district) should continue to provide the facilities.
- 2.6 The various ways this application fails to meet Policy 25 in terms of the need to conserve and enhance the rural character of the are, the quality of tis landscape and the natural and historic environment will be outlined in our separate Landsace submission and in section 15, Heritage Assets below.
- 2.7 The Applicant suggests that compliance with Policy 25 is achieved by remediating the actual site from its former unlawful use and seeking to restore the remote tranquil character. As set out in detail at paras 1.2 and 1.3 above, this ignores the fact that much of the 'remediation' was in fact the landowner acting to comply with Enforcement Notices. with the remainder of the 'remediation' relating to normal maintenance and management of land undertaken by any responsible landowner.
- 2.8 The improvements to which the Applicant refers, relate to the application site only and make no reference to the area beyond. The application fails to explain how a massive increase in traffic can enhance rural tranquillity, or how 15,169m² of new/converted non-agricultural floor space, 390 car parking spaces, 126 HGV parking spaces along with unspecified number of overflow parking spaces and 105 secure cycle shelter spaces will respect the natural environment and landscape and enhance the remote and tranquil rural character for the area.
- 2.9 None of the proposed uses provide a local or community offer or serve a local need - it provides a venue / destination drawing people in from outside the local area. This is reflected in the significant size and scale of car park provision.

Policy 2, Development Strategy and Settlement Hierarchy

Section Summary

- The application site must be considered against Policy 2 requirements for 'Rest of Plan Area'.
- The site is outside of a defined Settlement Boundary.
- Any development on the site must be 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 (as considered in section 1 above).
- The site cannot be considered as part of the Plaistow/Ifold Service Village.
- The proposals cannot satisfy any *"identified needs within the village, neighbouring villages and surrounding smaller communities...."*.
- The proposals cannot demonstrate that it *"will help make the settlement more self-sufficient"*.
- The proposals do not amount to/offers *"small scale employment, tourism or leisure proposals"* as required by Policy 2.

3.1 The application site is outside a defined Settlement Boundary in open countryside and rural in character. It is therefore considered 'Rest of Plan Area'. 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. These issues have been robustly considered in section 1 above and specifically at paras 1.7 – 1.10, 1.2 – 1.6, 2.9 and 1.14 – 1.19.

*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.***

Development and Settlement Hierarchy,
Chichester Local Plan strategic objective 5.6

3.2 *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 Crouchlands Farm is not within or adjoining the Ifold Settlement Boundary) then "small-scale" and "identified local need" remains the key objectives for all development.

3.3 I.e., *“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”.*

3.4 As detailed at para 1.4 – 1.6 and 2.8 above, the development of a “world Class” equestrian facility (Equestrian Report, section 4.2) and glamping venue, which requires 15,169m² of new/converted non-agricultural floor space, 390 car parking spaces, 126 HGV parking spaces along with an unspecified number of overflow parking spaces and 105 secure cycle shelter spaces to accommodate the large numbers of people arriving from outside of the *“village, neighbouring villages and surrounding smaller communities”* does not meet the development requirements for Service Villages as set out in Policy 2.

Policy 3, The Economy, and Employment provision

Section Summary

- Economic development in rural parts of the plan area must be “...small-scale employment development [...] permitted in appropriate circumstances where commercial demand exists.”
- Policy 3 must be considered in conjunction with Policies 25 and 45 (para 4.2).
- The proposed development is large scale.
- The Applicant has failed to demonstrate that any commercial demand exists.
- No third-party evidence has been produced by the Applicant to demonstrate need / demand / support for the proposed uses/users of the site.
- The Applicant has failed to meet the requirements set out in Appendix E of the Local Plan, as highlighted by the Parish Council’s letter of 15th September 2022 (see Appendix G).

4.1 Policy 3 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.”

4.2 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.

4.3 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’.

4.4 The proposed development is unlikely to provide the required ‘**local employment opportunities**’.

As outlined in the Parish Council’s Transport submission dated 3rd October: -

“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 ... 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...” para 14, page 4.

This must be considered in conjunction with the recent Horse & Hound article referenced at paragraph 1.15 above: *'Without staff, we have no business': change needed to ensure a sustainable workforce'* which discusses the current skills shortage facing the equestrian industry; the unfilled vacancies and that *"about 40% of people are paid below the minimum wage"*.

- 4.5 The proposed development cannot be regarded as **'small scale'** and the Applicant has failed to demonstrate any commercial demand.
- 4.6 The Parish Council refers to its letter dated 15th September querying if the Applicant had complied with the requirements of Appendix E of the Chichester Local Plan and seeking sight of any submitted commercial viability information.
- 4.7 The Parish Council has been unable to ascertain within the submitted documents adequate primary evidence demonstrating **commercial viability and/or demand** for the various proposals. Please refer to para 1.15 above and Appendices A and B.
- 4.8 There are no commercial reports from local agents/qualified valuers.
- 4.9 There are no tenants / potential users supporting this scheme e.g., Food Producers / Bakers / Chefs / Microbrewers / Ironworkers / Woodworkers / Jewellers / Craftsman.
- 4.10 There are no third-party educational establishments or businesses confirming their requirements for Office Units / Light Industrial Units / Educational Accommodation / Laboratories / Conference Facilities.
- 4.11 Without this essential commercial information, it is impossible for the LPA to determine if the loss of agricultural land is appropriate in the circumstances – in accordance with Chichester Local Plan strategic objectives 16.3 – i.e., *"[the] loss may be necessary as there may be instances where there are no suitable, sustainable alternatives to development."*
- 4.12 Nevertheless, considering the argument outlined at paras 1.7 – 1.10 above regarding the lack of need for a countryside location, the lack of sustainability of location – as highlighted by the Planning Inspector, when dismissing the Biogas appeal - and the breach of Chichester Local Plan strategic objectives 3.24 regarding mitigating the impact of development on climate change, **it is not possible for the proposed development to be assessed as 'appropriate in the circumstances'**.

Policy 55 Equestrian Development

Section Summary

- The proposal is in breach of Policy 55 as the plans are unable to comply with ALL the policy criteria.
- None of the existing buildings at the site are being considered for reuse for the equestrian development. The equestrian complex is a completely new build.
- The scale, size and design of the equestrian center puts it at odds with Chichester Local Plan strategic objectives 20.10 – 20.13 i.e., it will have a major impact on both the immediate rural landscape and that of the surrounding area.
- 8,108 m2 of enclosed floor area.
- 5,800 m2 of outdoor arenas.
- New access roads and tracks.
- 126 horsebox parking spaces.
- 157 car parking spaces.
- The proposal will see the loss of Agricultural land in breach of the policy.
- The proposal requires four (4) residential units in breach of the policy.
- The Applicant has failed to comply with Chichester Local Plan strategic objective 20.13 and Appendix E, in that they have failed to provide *“the details of information which may be required as part of a planning application.”*
- The proposal will increase the risk to other road users, due to the stated increase in HGVs and other vehicle traffic on rural, narrow country lanes in breach of policy 55.6.

5.1 Chichester Local Plan strategic objectives 20.10 – 20.13 clearly states that where it can be demonstrated that equestrian activities and facilities are required,

- *“it is necessary to ensure that there is no harm to the character and appearance of the countryside”* (20.10)
- *“it is essential that any equestrian development does not have an adverse impact on the special qualities of the landscape...”* (20.12)
- *“the design and materials of new horse related structures must be in keeping with the character of the rural area...”* (20.12).

5.2 The design, size and siting of the proposed equestrian centre puts it at odds with all the above strategic objectives.

5.3 In accordance with Policy 55.2, *“existing buildings are reused where possible...”*

5.4 None of the existing buildings are being considered for reuse for the equestrian development at the site. The equestrian complex is a completely new build, with no apparent consideration having been given to repurposing existing agricultural buildings at the site for equestrian use.

- 5.5 In accordance with Policy 55.3, *“there is minimal visual impact on the landscape caused by the proposed development either individually or cumulatively.”* This requirement works in conjunction with Policy 55.2 i.e., *“...where new buildings are necessary, these are well-related to existing buildings...”* Please refer to our separate Landscape submission, which considers Landscape in more detail.
- 5.6 The proposed 8,108 m² of enclosed floor area; 5,800 m² of outdoor arenas; access roads and tracks; 126 horsebox parking spaces and 157 car parking spaces indicates that the equestrian centre will have a major impact on both the immediate rural landscape and that of the surrounding area. The size of development will not relate well to the existing buildings on the site. (Please cross reference with paras 6.1 and 6.2 above)
- 5.7 The need for a Traffic Management Plan indicates the size and regional/national aspirations of the equestrian centre. The volume of traffic alone such a large facility will produce will have a detrimental impact on the landscape and the whole development will breach the requirement of Policy 55, that equestrian development has *“minimal visual impact on the landscape”*.
- 5.8 The inspector for the Biogas appeal noted that the primary purpose of Agricultural land should be for growing food. This proposal would result in considerable loss of agricultural land in breach of Policy 55.4.
- 5.9 In accordance with Policy 55.7, *“the proposal [should] not lead to the need for additional housing on site”*. The proposed stables are of a size that there is apparently an essential requirement for four (4) residential units. A ‘residential unit’, in which someone lives, equates to ‘additional housing on site’ in breach of the policy.
- 5.10 The Applicant has failed to comply with Chichester Local Plan strategic objective 20.13 and Appendix E of the Local Plan, in that they have failed to provide *“the details of information which may be required as part of a planning application.”* Please see Appendix F and G of this document (Parish Council Letters to CDC 15.08.2022, 15.09.2022).
- 5.11 Policy 55.6 states that *“the proposal [...] adequately protects [...] the safety of all road users”*. The proposals for 126 horsebox parking spaces, 157 car parking spaces and a requirement for a Traffic Management Plan suggest that other priority road users namely walkers / runners who use the roads without pavements; cyclists and local horse riders, will all face substantial additional traffic and be subject to considerable additional safety risks. This was an important consideration in the Biogas appeal (as noted above at paragraphs 5.8 and 5.16).

Policy 40 - Sustainable Design and Construction

Section Summary

- The proposals fail to meet Policy 40 criteria 40.7 – 40.10.
- The development is not designed in the local vernacular style in conflict with policy 40.7.
- The size of the development conflicts with Policy 40.9 - *“the development is appropriate and sympathetic in terms of scale, height, appearance, form, siting and layout and is sensitively designed to maintain the tranquillity and local character and identity of the area”*.
- The proposals cannot comply with Policy 40.10 i.e., to reduce the impact of associated traffic or pollution.
- Chichester Local Plan strategic objective 19.1 recognises that *“development is [...] directed to the most sustainable locations within the Plan area in order to minimise the need to travel.”*
- Policy 40 must be considered in conjunction with Policy 25 and 45, in particular.

6.1 Policy 40 sets out 10 criteria the application must demonstrate to have been considered proportionate to the scale of development. Given the large scale of the proposed development, the burden upon the Applicant to evidence is higher, as it is “proportionate to the scale of development”.

6.2 Policy 40.7 states *“the historic and built environment, open space, and landscape character will be protected and enhanced”*.

6.3 Policy 40.9 states *“the development is appropriate and sympathetic in terms of scale, height, appearance, form, siting and layout and is sensitively designed to maintain the tranquillity and local character and identity of the area”*.

6.4 Policy 40.10 requires *“the reduction of the impacts associated with traffic or pollution (including air, water, noise and light pollution) will be achieved...”*

6.5 In accordance with Chichester Local Plan strategic objective 19.1, *“development is [...] directed to the most sustainable locations within the Plan area in order to minimise the need to travel.”* Policy 40 cannot be considered in isolation but must be considered in conjunction with Policy 25 and 45 in particular.

6.6 The Parish Council considers that the Applicant has failed to adequately demonstrate how the proposals will meet these criteria 40.7 – 40.10 in particular.

6.7 The proposed development is very large, with modern buildings i.e., low profile metal roof, very large scale, mass and bulk, which are not constructed in the local vernacular (traditional build). Given the size of the development, and for the development to be economically viable, it will require a very large number of visitors and associated service personnel, the majority of whom

will need to assess the site by motor vehicle. This will increase impacts associated with traffic and pollution and must be considered against the area's tranquil rural and historic environment.

Policy 31, Caravan, and Camping Sites

Section Summary

- The proposals cannot meet ALL 5 criteria; therefore, the development is in breach of this Policy.
- The Applicant has failed to demonstrate “demonstrable need” as required by Policy 31.1.
- The Applicant has failed to comply with Appendix E of the Local Plan and provide evidence of the need for new tourist facilities to show a high demand on existing sites and justification for new sites.
- The Applicant has failed to provide fundamental information about the proposed glamping use e.g., the number of occupants the site can accommodate.
- Therefore, the LPA cannot assess compliance with Policy 31.3 i.e., “sensitively sited and designed to maintain the tranquility and character of the area”.
- The Applicant will have little control over the noise, light, movement, and behavior of occupants – especially when combined with wedding receptions and alcohol consumption, which will have an adverse impact upon local residential amenity and impact the sensitive ecology and biodiversity of the ancient woodland in proximity.
- The glamping proposals must be considered in relation to the proposals for a wedding venue at Hardnips Barn and the other proposed uses on the site.

7.1 The glamping proposals for the site fall within this Policy, as glamping is another name for camping and the Policy includes the use of yurts.

7.2 For the LPA to approve an application, ALL five (5) criteria must be met.

7.3 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.

7.4 Appendix E of the Local Plan states: -

Additional Information relating to [...] proposals for [...] tourism and/or leisure development

E.7 In addition to the general criteria above evidence may be required to demonstrate:

- *Evidence of the need for new tourist facilities to show a high demand on existing sites and justification for new sites, having regard to the quantitative and qualitative analysis of the range of tourist accommodation, including details about other local touring and permanent sites.*

7.5 The Applicant has provided a list of sites in the area, the facilities and costs to stay overnight, but this does not demonstrate the required ‘*demonstrable need*’ / ‘*evidence of the need for new tourist facilities*’ / ‘*show a high demand on existing sites and justification for new sites*’.

7.6 In accordance with Policy 31.3, new sites should be *“sensitively sited and designed to maintain the tranquillity and character of the area”*.

7.7 The Parish Council respectfully highlights that the Applicant has not stated how many occupants the 21 glamping units will accommodate. It is a reasonable assumption that each unit will accommodate at least two occupants, and some will be for families / larger parties of 4 – 6 people. Therefore, the number of occupants could be in excess of 84 per night.

7.8 Larger numbers of people glamping, coupled with the use of Hardnips Barn as a wedding venue (either separately and therefore with cumulative impact, or, in conjunction with the glamping facility – i.e., wedding guests and therefore consideration of late-night / alcohol inspired behaviour associated with wedding receptions) would impact local residential amenity and impact the sensitive ecology and biodiversity of the ancient woodland in proximity. Please consider our separate Landscape submission and section 15 below regarding Landscape and Heritage Assets.

7.9 The Parish Council notes that the Applicant will have limited ability to control or enforce any imposed conditions in relation to the following activities of the occupants:

- noise (music / alcohol consumption)
- light
- movement around and through the site

Policy 48, Natural Environment

Section Summary

- The proposals do not meet ALL the criteria set out in Policy 48.
- Policy 48 requires that there are no adverse impacts upon the tranquility and rural character of the area (48.1).
- The total new developed area for the site is 65000m².
- The Applicant is wrong in their assertion that the site does not display the remote, tranquil character that is typical of the Low Weald.
- The Applicant erroneously and disingenuously refers to the sites previous unlawful use as a Biogas plant.
- The Applicant purchased the land in the full knowledge of the Enforcement Notices and the legal requirement to remediate the land to its former remote, tranquil, Low Weald character.
- All other works outlined by the Applicant are normal land management and maintenance required to be undertaken by any responsible landowner. No credit should be given for such works. This would be akin to a householder undertaking typical maintenance works e.g., replacing rotten windows and then seeking to rely upon such maintenance as justification for a change of use.
- Recent planning appeal decisions in the Parish recognise the tranquility and rural character of the area.
- The Planning Inspector dismissed an appeal on the site regarding a modest woodstore erected at Hardnips Barn without permission citing Crouchlands Farm's undeveloped open countryside, interspersed with other tracks of woodlands of varying sizes. The inspector noted that this gave the surroundings a secluded rural character and appearance. The Inspector concluded that the erection of a relatively modest wood store failed to recognise the distinctive local landscape character and sensitivity and failed to respect and enhance the landscape character.
- Within the Biogas appeal, the Planning Inspector likewise noted that whilst the impact of the unauthorised development was restricted to a relatively small local area, it was still considered to be detrimental to the identified rural character of the surroundings.
- The scheme, if approved, would result in the fundamental change to the local landscape character. Rather than Crouchlands Farm being an agricultural farm (its true former lawful use) the current proposals seek to reduce farming activities and operations on the site to a subservient 'after-thought' to the predominant non-agricultural uses.
- The site will become a major commercial, industrial, and retail centre.
- Crouchlands Farm would become a "Landmark destination" in itself; seeking to appeal to a regional and National market in terms of the international standard equine centre and glamping facilities.

8.1 Policy 48 requires ALL criteria to have been met.

8.2 Policy 48 requires that there are no adverse impacts upon the tranquillity and rural character of the area (48.1). Please refer to our Landscape comments which have been submitted separately. Also, please note, most dismissed appeals in this area – please refer to section 10 below – reference breaches of Policy 48 and refer to the area’s established landscape character and appearance.

8.3 The new development will consist of: -

- 15169m² of industrial, commercial, retail, and equestrian facilities
- a further 5800m² of arenas (80m x 50m + 60m x 30m)
- 390 car parking spaces
- 126 horse box/HGV parking spaces
- Additional overflow parking
- Access roads both onto and around the site

8.4 The total new developed area for the site is 65000m².

8.5 The Applicant argues that the area has been an industrial site and does not display the remote, tranquil character that is typical of the Low Weald.

8.6 The site has been the subject of unlawful operations. The Applicant acquired the site in full knowledge of its unlawful prior use and the conditions of the Enforcement Notices - attached to the land - that required the decommissioning and removal of the unlawful plant and associated restoration site works. Such works, to restore the site to its lawful rural and tranquil Low Weald state are a legal requirement.

8.7 Other works cited by the Applicant, such as Woodland management, are no more than normal land management and maintenance as undertaken by any responsible landowner. No credit should be given for such works. This is no different to a householder decorating the outside of their house, changing their rotten windows, or undertaking a myriad of other maintenance works and then seeking to use such maintenance works as justification for a change of use.

8.8 There have been many planning appeal decisions in the Parish that recognise the tranquillity and rural character of the area. For example, the appeal decision relating to Hardnips Barn (APP/L3815/W/16/3150857, para 10.10 below), where a wood store had been erected without planning permission. Within the Appeal decision the Inspector commented on the areas of undeveloped open countryside, interspersed with other tracks of woodlands of varying sizes. The inspector noted that this gave *“the surroundings a secluded rural character and appearance notwithstanding the proximity of the complex of large modern buildings at Crouchlands Farm”*. The Inspector concluded that the erection of a relatively modest wood store failed to recognise the distinctive local landscape character and sensitivity and failed to respect and enhance the landscape character. *“The building causes unacceptable harm to the character and appearance of the surrounding area”* and *“does not conserve and enhance the rural character of the area and quality of its landscape”* (para 9 of APP/L3815/W/16/3150857).

- 8.9 Similarly with the Biogas appeal, the Inspector noted that whilst the impact of the unauthorised development was restricted to a relatively small local area, it was still considered to be detrimental to the identified rural character of the surroundings. *“I consider that the combination of all the development noted above is detrimental to the identified rural character of the surroundings”* (para 84 of the appeal decision).
- 8.10 The scheme, if approved, would result in the fundamental change to the local landscape character. Rather than Crouchlands Farm being an agricultural farm (its true lawful use) the current proposals seek to reduce farming activities and operations on the site to a subservient ‘after-thought’ to the predominant non-agricultural uses.
- 8.11 Rather than a farm with some small scale associated activities to support the prime agricultural function and viability, the site will become a major commercial, industrial, and retail centre.
- 8.12 In terms of the international standard equine centre and glamping facilities, Crouchlands Farm would become a “Landmark destination” in itself; seeking to appeal to a regional / national market.
- 8.13 The site would become a destination in what is acknowledged to be remote and tranquil countryside, away from A and B roads requiring motorised access via narrow and single-track roads.
- 8.14 These plans do not *“respect and enhance the landscape character of the surrounding area and site, and public amenity...”* (Policy 48.3)

2. LIGHTING

Section Summary

- The proposals are erroneously based on the assumption that the surrounding area is an E2 (or mix of E1 and E2) Environmental Zones.
- The correct Environmental Zone for the entire Site is E1.
- The light intensity levels need to be reduced to 5 lux throughout the site to comply with the E1 requirements.
- Appendix A of the Lighting Impact Assessment, which should show a map of the viewpoint locations, is missing from the application.
- The 'External Isoline Contours for Artificial Lighting' document – which states an assumed Environmental Zone of E2 for the surrounding area – is inconsistent with the 'Light Impact Assessment', which instead assumes a *mix* of E1 and E2.
- The omission of the use of a sky quality meter is disappointing, as this would have provided Sky Quality Measurements (SQM) and allowed for a more scientific assessment of the Environmental Zones.
- The stated aim to contain artificial lighting around uses within the middle of the site is sensible, but raises the question of what constitutes the 'middle'.
- The proposed 10 lux illumination for the car parks should be questioned given their more peripheral location.
- The lighting for each car park should be separately assessed and minimised according to their individual traffic level. For 'light' traffic, an intensity of 5 lux is recommended, with 10 lux being reserved for 'medium' traffic car parks [REF-4, page 41].
- The Parish Council notes that the list of external areas requiring illumination does *not* include the Equestrian Centre's Large Outdoor Arena.
- If the Local Planning Authority were minded to approve the application for an equestrian centre, it should condition the use to ensure that there would be no illumination of the Large Outdoor Arena during hours of darkness.
- The Site's location enjoys the same – and often superior – quality of night sky as much of the nearby South Downs National Park. This is supported by the marked visibility of the Milky Way from Rickman's Lane and the public bridleways which cross the Site. Such clarity of the Milky Way is a good indication that the sky quality exceeds 20 magnitudes per arcsecond² in the location, as outlined/confirmed in the SDNP response to the application.
- In accordance with the ILP Guidance Note, "The Reduction of Obtrusive Light", the maximum Upward Light Ratio (ULR) for Environmental Zone E1 is 0. The current proposals fail to comply with this recommendation.
- There is little to suggest that compliance with E1 lighting could not be achieved.

References

Ref-ID	Title	Organisation	Document ID	Web Reference
REF-1	<i>Dark Sky Reserve Designation Guide</i>	International Dark-Sky Association		Link
REF-2	<i>The Reduction of Obtrusive Light Guidance Note</i>	Institution of Lighting Professionals	GN01/21	Link
REF-3	Light Pollution	Environmental Protection UK		Link
REF-4	Design of Road Lighting	British Standards Institution	BS 5489-1:2020	Link

9.1 The Parish Council has carefully reviewed the proposed lighting for the Crouchlands Farm redevelopment. The following documents are reviewed below:

- Equestrian Centre Report (para 13.2 – 13.3)
- Design and Access Statement (paras 13.4 – 13.7)
- External Isoline Contours for Artificial Lighting (para 13.8 – 13.9)
- Lighting Impact Assessment (paras 13.10 – 13.27)

9.2 Equestrian Centre Report:

Section 5.3, Indoor Arena

It is noted and welcomed that riding in the darker hours of the winter months would be redirected to the indoor area as a measure to limit light pollution.

9.3 Nevertheless, given that the Equestrian Centre, as a whole, is stated to be a 24/7 facility, assurance must be given by the Applicant that there will be no future intention to illuminate it for use during hours of darkness.

9.4 Design and Access Statement:

Section 3.8, Lighting

The stated aim to contain artificial lighting around uses within the middle of the site is sensible, but it does raise the question of what constitutes the 'middle'?

9.5 Referencing the Isoline contours for artificial lighting, the proposed 10 lux illumination for the car parks, for example, should be questioned given their more peripheral location.

9.6 Notwithstanding this, it is clear that the 10 lux proposal is a blanket specification for all car parks, regardless of their size and volume of movements. Instead, each one should be separately assessed and assigned lighting according to their individual traffic levels.

- 9.7 For 'light' traffic, an intensity of 5 lux is recommended, with 10 lux being reserved for 'medium' traffic car parks [REF-4, page 41].
- 9.8 External Isoline Contours for Artificial Lighting:
Note 5
The assumed Environment Zone of E2 is contested (see paras 13.11 onwards below).
- 9.9 It is noted that this document – which states an assumed Environmental Zone of E2 for the surrounding area - is inconsistent with the Light Impact Assessment, which instead assumes a *mix* of E1 and E2.
- 9.10 Lighting Impact Assessment (LIA):

It is noted that Appendix A, showing a map of the viewpoint locations, is missing, and was not provided as a separate document. This map would have provided the context of each location and collectively shown the thoroughness of the survey. Whilst coordinate for each location are given, it should not be up to the reader to plot them to gain this understanding. It is therefore difficult to conclude that the assessment provides a true representation of the site.
- 9.11 LIA Section 3, Assessment Methodology
Although the date chosen for the site visit (30th March 2021) coincided with a near full moon, the assessment seems to have been completed prior to it rising at 10pm. The recorded light levels have therefore not been affected and represent the typical conditions prevailing at the site.
- 9.12 The omission of a sky quality meter is disappointing. The employment of such a device would have provided Sky Quality Measurements (SQM) and allowed for a more scientific assessment of the Environmental Zone (see Table 1, at 13.18).
- 9.13 However, it is noted that the light levels recorded using the more general light meter are all < 2 Lux, with most being 0. These all comply with the maximum luminance levels for an E1 zone [REF-2, page 12].
- 9.14 LIA, Section 3.4, Assumptions/Limitations
The assumed mix of Environmental Zones E1 and E2 for the surrounding area is contested by the Parish Council, as there is no evidence that the site has any E2 component.
- 9.15 Whilst the Parish Council recognises that the Site is not within a designated dark sky reserve, the Site's location enjoys the same – and often superior – quality of night sky as much of the nearby South Downs National Park. It is only the core areas of the SDNP (known as Dark Sky Discovery Sites) that have a superior sky quality. The rest of the national park – which also enjoys Dark Sky Reserve status – provides a buffer for these inner zones. It is within these buffer regions

that the sky quality is frequently inferior to that enjoyed at Crouchlands Farm. This assertion is further supported by empirical evidence, and the use of both standard and accessible tests for the measuring of sky quality. One of which is the ability to identify the Milky Way, which indicates a Sky Quality Measurement (SQM) in excess of 20 magnitudes per arcsecond² [REF-1, page 7]. This is confirmed in the SDNPA response to this application. Referencing the Environmental Zone definitions [REF-2, page 10], such SQMs correspond to an E1 zone.

9.16 Given the range of SQMs associated with each Zone, and the rationale described above at paras 13.14 – 13.15, it is asserted by the Parish Council that the correct Environmental Zone for the entire surrounding area is E1.

9.17 This is not insignificant, as the need for lighting to comply with an E1 Zone would significantly reduce the Upward Light Ratio (ULR).

9.18 Table 1 – Environmental zone definitions [REF-2, page 10].

Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark (SQM 20.5+)	Astronomical Observable dark skies, UNESCO starlight reserves, IDA dark sky places.
E1	Natural	Dark (SQM 20 – 20.5)	Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty, IDA buffer zones etc.
E2	Rural	Low district brightness (SQM ~15 – 20)	Sparsely inhabited rural areas, village, or relatively dark outer suburban locations

9.19 The main difference between the lighting requirements for E1 and E2 Zones is the maximum ULR recommended by the Institute of Lighting Professionals (ILP). These are set out in [REF-2, page 15], and shown in Table 2.

9.20 Table 2 - Maximum ULR for each Environmental Zone [REF-2, page 15]

Zone	E0	E1	E2	E3	E4
Max ULR	0	0	2.5	5	15

9.21 From an implementation point of view, this largely means that all lamps should be shielded down to the horizontal to eliminate all upward component of the illumination.

9.22 The proposal already states that luminaries will be flat (assumed horizontal) glass and have zero tilt. However, a reduction to 5 lux is necessary throughout. However, given this level is described as "night-time in an urban street" [REF-3, page 3], it should still fulfil the basic needs for the illumination.

9.23 There seems to be little to suggest in the proposals that E1 compliance for lighting could not be achieved. However, these constraints would need to be conflated with those prescribed for health and safety requirements before the development's viability could be assured.

9.24 LIA, Section 6.2, Operational Phase Embedded Mitigation (page 38)

It is noted that the list of external areas requiring illumination does *not* include the Large Outdoor Arena.

9.25 Since the Equestrian Centre, as a whole, is stated to be a 24/7 facility, assurance must be given by the Applicant that there will be no future intention to illuminate it for use during hours of darkness.

3. HERITAGE ASSETS

Relevant policies
CLP 47
NPPF 195, 197, 199, 201

Section Summary

- The Parish Council has carefully reviewed the **Heritage Statement**, produced by DLBP Ltd ('the Report') in support of the Planning Application.
- The Report limits consideration of heritage to five (5) Grade II Listed buildings in close proximity to the proposed development and the Plaistow Conservation Area (CA). It does not consider the impact on the wider area containing listed buildings, nor on the historic landscape.
- The Report dismisses impact to Listed and non -designated heritage assets and the CA from increases to road traffic and changes to road access. Considering the above illustrated adverse impact of increased traffic generated by the Proposals (see our separate Transport submission) the Applicant should be requested to reappraise the Heritage Statement to take into consideration the impact of increased traffic movements in the area.
- The Report fails to sufficiently interrogate the adverse impact on setting to Grade II listed buildings. In particular, Crouchlands House, Lanlands and Nuthurst and the historic landscape, which are in the immediate vicinity of the proposed development.
- The Report fails to define what the local vernacular is and then states that the proposed development is acceptable and has low impact on heritage assets, because the design reflects the local vernacular.
- The Report has insufficient consideration for impact of noise, light and smell to the setting of the heritage assets.
- The Report states that impact can be mitigated by tree planting. This is not regarded as suitable mitigation to make a poorly designed and located development acceptable. The trees should be deciduous, to reflect the surrounding countryside; therefore, in winter months leaf coverage will not screen the development. There will be greater use of artificial light.
- Crouchlands House is one of the premiere listed Buildings in the Parish and the Report does recognise its status and the importance of its wider setting. However, the impact of the proposed development has been dismissed as being part of normal changes to farming, which the house has witnessed through the centuries. There is no recognition that the size and scale of development in close proximity to the House goes well beyond that of a normal agricultural farm, even allowing for some subservient diversification to support the farm, as is now modern practice.
- **Overall it is considered that the Report fails to identify all the heritage assets or to consider**

fully the impact on the historic landscape. It fails to sufficiently consider the impact of the extremely large-scale development, which goes beyond normal farm diversification, on the historic assets and the historic landscape.

- There is no evidence that the proposed development has been designed to respect and enhance the historic assets and landscape. The Report is reactive to the design scheme rather than being shown to have influenced design decision making. In doing so, the proposed development cannot demonstrate it recognises, respects, and enhances the local distinctiveness and character of the area, landscape, and heritage assets in line with Policy 47.
- The Heritage report seeks to downplay any impact and draws conclusions of 'less than substantial harm' or 'no harm' to attempt to meet the NPPF.

10.1 The following are relevant current planning policies: -

- **CLP Policy 47** Heritage and Design*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.
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.*
 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.*
- **National Planning Policy Framework (NPPF)**
 - **195.** *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.*
 - **197.** *In determining applications, local planning authorities should take account of: [...] (c) the desirability of new development making a positive contribution to local character and distinctiveness.*

- **199 - Considering potential impacts.** *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.*
- **201.** *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.*

10.2 Consideration of the Heritage Assets is limited, and findings are totally reliant on the other reports in the application.

The Report identifies only 2 Grade II listed buildings close to the development site: Crouchlands House and Lanelands; and 3 others in Rickmans Lane: Nuthurst, Little Flichings, and The Old House. It also considers the Conservation Area of Plaistow.

10.3 In summary, the conclusion is that the buildings identified will suffer 'less than substantial harm' or 'no harm'. The Conservation Area (CA) and the 30 Grade II buildings in Plaistow will suffer 'no harm', due to the separation of the development from the CA.

10.4 The Report does not identify other heritage assets in the wider area which may be impacted, such as those on the surrounding highways and there is no assessment of the significance of these assets.

10.5 The Report reproduces a number of historic maps but makes little reference to the value and significance of the Historic landscape.

10.6 The Report relies wholly on other documents in the application and reiterates the conclusions within these documents, such as the Planning Statement, Transport Assessment, and Lighting Assessment without specific further interrogation or analysis of the impact on heritage both for the buildings and the landscape in which these buildings are set.

10.7 Therefore, the inaccuracies of these documents, as highlighted by the Parish Council above, immediately calls into question the findings of the Heritage Assessment.

10.8 Traffic and the Historic Environment The Report does not consider the impact of traffic movements on those historic buildings identified, or on the CA and the Grade II listed buildings in Plaistow. Nor does it identify historic assets in the wider geography and the access highway network.

10.9 Therefore, the Grade II Listed buildings in Foxbridge Lane, Foxbridge Farmhouse and Plaistow Road Ifold, Keepers Cottage, and the Grade II listed buildings on the route through Kirdford, and the Kirdford Conservation Area are not identified, assessed, and considered in relation to the development.

10.10 The 'destination' venue which the proposed development will create – considering its size and nature - will require both its large work force and site user to travel into the development from the wider area of Chichester, Horsham, Waverley District, Guildford Borough and the Southeast region/national (equestrian events and holiday makers). This volume of traffic is underlined by the amount of car, coach, and lorry parking provision on site.

10.11 Increased traffic movements, both cars and HGV, will change the historic environment, with additional road noise, vibration and a significant change to the relative quiet historic country lanes and roads through the villages. The significantly increased vehicle movements on the site itself, travelling to the site and carparking on site will change the setting of the Historic buildings and the CA.

10.12 The Report dismisses vehicle impact on the basis that these are roads in use anyway. However much of the traffic in the area is generated by local movement especially for Rickmans Lane and Foxbridge Lane. With very little through traffic mainly limited to Plaistow and Loxwood Road. The Report has not recognised the day to day increases and the event increases in traffic created by the proposed development being a 'destination development'. This would be most noticeable at weekends, when the surrounding villages and particularly Plaistow and Kirdford are at their most quiet and tranquil, reflecting their historic setting.

10.13 The adverse impact of traffic movement was specifically recognised by the Planning Inspector in the Appeal Decision for Crouchland Farm Biogas development Appeal A: APP/L3815/C/15/3133236 Appeal B: APP/L3815/C/15/3133237.

1. Historic Landscape, field patterns, historic PROW and road access There is little to no assessment or consideration of the impact of the development on these matters: -

- Although historic maps are listed in the heritage documents, they are not used in relation to historic field patterns. This section overlaps with the landscape assessment above.
- The development will significantly alter the 'setting' of the PROW on site, particularly the ancient drovers routes running through Crouchlands farm land and adjacent to the proposed development. The experience of users of these historic routes will change significantly from a quiet tranquil rural route, little altered over the centuries from which the historic patterns of use and development can be appreciated and understood; and on which there are few other pedestrians or vehicle movements. The route passing the contained modern farmyard and historic houses will change to that of routes dominated by large scale and extensive commercial and retail outlets and equestrian development together with unspecified number

of holiday makers and wedding guests also on site. With numerous vehicle and pedestrian movements, carparking, noise, smells, and lighting.

- The increased volumes of traffic identified in the documents generated by the proposed scheme will significantly alter the quiet country lanes and the relatively quiet village roads through Plaistow and Kirdford.
- The new site access will alter the road layout at Streeters Farm, a non-designated heritage asset and remove historic hedging and create a large intrusive road network into the farm. Together with increased vehicle movements through the farm site, not related to farming.

Consideration of the specific historic assets identified in the Report

2. Crouchlands House

- The Report does provide an accurate historical description of the asset and recognises at **para 79** the largely unchanged wider setting in which the former Farmhouse sits. Recognising at **para. 85** that the house sits in an agricultural landscape. However, in considering the impact of the proposed development it has had insufficient regard to:
 - a. The proximity of the largest section of the development, the equestrian unit together with the retail and food outlets. The mass and bulk of the equestrian development has not been sufficiently considered. This is an Olympic size indoor and outdoor arena less than 150m from the house. There are no cross sections of the site to understand the impact.
 - b. The Equestrian building is stated in **para. 82** as being in the local vernacular reducing the impact. However, this building is a very large modern structure with large low pitched metal roof and bears no similarity to the local vernacular of plain clay tile, brick, and timber. The local vernacular is not described in the document.
 - c. The access to the house will be through the 'urban' development of the retail, agri -tech buildings, carparking and coach parking. Significantly different to the current access. **Para 84** identifies the significant change to the access but does not engage with the impact.
 - d. At **para 83**. the report considers the impact of the agri-tech and glamping to be neutral on the House, but again traffic movements through the site, carparking, numbers of people on site, noise and lighting associated with these uses is not considered.
 - e. Overflow car parking for the equestrian development is set along the PROW immediately adjacent to Crouchlands House boundary.
 - f. Noise, smell, and lighting from the proposed development is mentioned but not specifically assessed in this document for Crouchlands House. The size of the Equestrian development and its operational use must be considered and its level of impact on the setting of Crouchlands House.
 - g. The experience from the PROW, the historic north south route Kirdford to Plaistow, both of the route and of Crouchlands House setting will be adversely impacted. Viewers - pedestrians, cyclists and horse riders - will be conscious of the significant difference between the historic house and the huge scale of development adjacent.

- The Report fails to analyse the above aspects. Instead, it refers to remediation of the farm and diversification as justification for the development. The application considers that the adverse impacts can be mitigated by tree planting and regrading, **para 82**. However, no reference is made to tree type and unless evergreen (which is not suitable in this landscape) would leave Crouchlands House with clear views through to the development in winter. Tree size may take many years to screen the development from Crouchlands House. In winter months there will be greater and longer periods of artificial light usage, not screened by the planted trees.
- The Report's conclusion is that the effect on Crouchlands House is 'less than substantial harm' and the proposed development is dismissed as being part of the ongoing change in agriculture that Crouchlands House has experienced through the centuries. However much of the proposed development does not require a countryside setting nor is it subservient to the main farming operation.

3. Lanelands

- Similar comments apply as detailed above at 15.16 regarding Crouchlands House.
- The setting of Lanelands is identified in the Report at **para 95**, despite changes in landownership and use, as historically consistent woodland interspersed with irregular fields located on the same ancient North-South route as Crouchlands House.
- The Report does identify that the view from Lanelands will be impacted by the roofscape of the equestrian development and that there will be an impact from lighting the new development. Thus, adversely impacting the setting.
- The Report again refers to the buildings reflecting the local vernacular (**para 98**) and to tree planting reducing any impact. However, as above, the application fails to identify, or describe the local vernacular and the development is plainly not in a local vernacular.
- The document states that there will be no light spill reaching Lanelands (**para 99**). However, use of the arena and car parking will be lit at night and must generate light in an area where currently there is none. Noise is not mentioned, but the equestrian development use must generate noise, again currently where there is little or none. The equestrian development will operate 24/7.

4. Nuthurst, Little Flitchings, and Old House

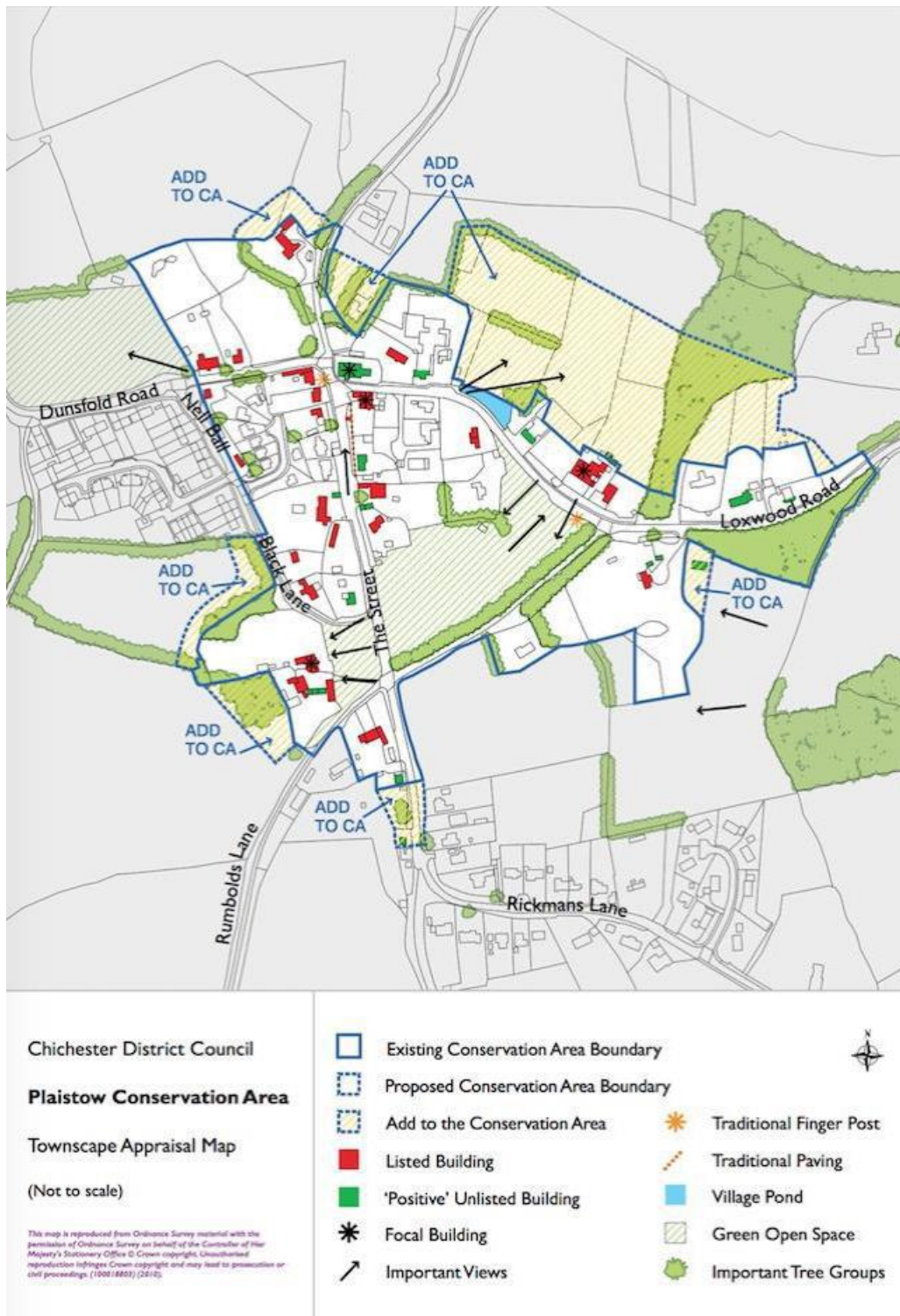
- The proposed development is considered in terms of highway impact, noise and light. All are considered to have a neutral impact.
- Increase in vehicle movements and in particular HGV will impact the setting of these assets, particularly Nuthurst and Old House which are situated close to the road.
- Light and noise is considered to be mitigated. However, there is no consideration of the impact on Nuthurst and its setting. Nuthurst, although adjacent to Rickmans Lane, is set in a rural area, it sits on higher ground overlooking fields to Crouchlands farmyard. The views and setting is quiet rural fields and trees with the compact modern agricultural buildings. Accordingly, it will have clear views of the development which is not recognised in the Report. The large additional structures proposed will be visible changing the experience and setting from Nuthurst.

- Noise both day and night from the proposed development will channel up the valley to Nuthurst. Such uses as the glamping and use of Harnips Barn will result in noise levels and light in both a quiet and dark countryside setting. Screening by tree planting will not obscure such changes.

5. **Plaistow Village Conservation Area (CA)**

- The Report considers there would be no impact from the development due to its distance away from the CA. Traffic generation and noise is dismissed because vehicles accessing the development will use the existing highway.
- There is no consideration of any increase in movements generated by the proposed development. However, it is considered that increased traffic movement through the village will alter the generally quiet tranquil setting of the CA and its historic Listed and non-designated heritage assets; (as identified not only in the Applicant's own Transport Assessment, but also from the Parish Council's own analysis as detailed above at page 26, section 11).
- Plaistow currently has little through traffic especially to Rickmans Lane. Traffic is currently generated by immediate local movement. However, for the Proposal to be commercially successful, it must become a regional / national destination. There is no suitable public transport and access will be by car, HGV, and coach.
- Fig.6 is a map of Plaistow's Conservation Area. Red demarks Listed Buildings. Arrows denote important views: -

Fig.6



Consideration of Non-heritage Assets identified in the Report and the impact of the scheme

6. Hardnips Barn

- Hardnips Barn has been altered through recent redevelopment to a residential unit. However, the further change of use to a café/bar is likely to have a significant impact on the structure. The Parish Council notes the comments made by Chichester District's Planning Policy in

relation to this structure and agrees with/supports the assertion that “... care should be taken to ensure further degradation of the original character is avoided.” (pg.4)

- The proposed use as a café/bar will impact on the very quiet and dark rural area, generating noise and light impacting on the historic landscape and historic assets such as Nuthurst, detailed above at 15.18.
- It will also change the setting of this non heritage asset from a former quiet barn and then residence to a hub of activity within a very rural woodland and field setting.
- It is accepted that other sites identified, including historic glass workings, limekilns and quarry are not included or necessarily impacted provided public access is restricted to these areas.

7. Streeters Farm and Redlands

- The Report recognises that there has been little change to the historic setting, settlement and fieldscape pattern, relating to these properties.
- The Report states that the proposed development will preserve and strengthen the agricultural use. However, as none of the development is agricultural use, instead being industrial, office, retail and equestrian, and its size and scale is beyond normal levels of agricultural diversification, this will have far reaching ramifications for the little changed historic landscape and the setting of both listed and non-heritage assets.
- Access changes will have a severe impact on Streeters Farm and its setting. The access is larger in width than Rickman’s Lane, creating an anomaly in this quiet rural hedge bound country lane.
- Increased traffic movements will create noise and light directly opposite the buildings. This has not been fully addressed in the Report.
- Redlands Farm will experience noise and light in an area where there is currently little. This alters its setting, as for other properties.

8. Heritage Assets Not identified

- The Report has not recognised any changes to the wider area along access roads particularly Foxbridge lane, Plaistow Road, Ifold and Plaistow Road, Kirdford.
- There are Grade II Listed Buildings fronting these roads and they will be adversely affected by increased traffic levels.
- This is particularly the case for Foxbridge Farmhouse, Foxbridge Lane. Currently Foxbridge Lane is a narrow country lane serving local traffic. With the current proposal it will become the major access route into the development with vehicles arriving from a large regional area. Therefore, the Farmhouse will suffer additional noise, vibration and disturbance and the lane will cease to be a quiet route and the setting will be altered.
- The Report is based on the Applicant’s Transport Assessment, which the Parish Council asserts is incorrect, as detailed above in the Transport section of this response. Therefore, the Parish

Council requests that the Applicant reappraise its Heritage Statement to take into consideration the impact of increased traffic movements in the area.

- The importance and adverse effect of traffic movements is held in the Appeal Decision for Crouchland biogas ref: Appeal A: APP/L3815/C/15/3133236 Appeal B: APP/L3815/C/15/3133237.

4. DISMISSED PLANNING APPEAL DECISIONS

- 11.1 There have been numerous dismissed Planning Appeals Decisions within the Parish Area (Plaistow and Ifold) that reinforce the unsuitability of this area for the type of developments that is currently proposed by the Applicant.
- 11.2 These Planning Appeal Decisions have been made within the current Chichester Local Plan period.
- 11.3 These Planning Appeal Decisions provide precedent and guidance as to the application of Chichester Local Plan policies in this area.
- 11.4 Unless the Local Planning Authority can robustly evidence *how* and *why* the current application differs significantly from the planning decisions made in each case, firstly by the LPA itself and latterly by the Planning Inspector when dismissing the Appeals, the Planning Officer must apply the Chichester Local Plan policies to the current application in the same manner.
- 11.5 Given that the current application is for development far in excess of the below relatively modest proposals, which were all refused, it follows that the current application should not / cannot be permitted on the grounds of a myriad of relevant Chichester Local Plan policy.
- 11.6 The below table sets out a summary of the Planning Appeals Decisions; a more detailed overview of each case is set out beneath the table (paragraph number indicated below the ‘application number’).

Application number	Decision Date	Proposal(s)	Policies	Main issues
APP/L3815/W/20 /327113, Sparrwood Farm Para 10.7	19/05/21	Stable Barn 25x50m Ménage	CLP 45, 48, 55 NPPF 175 (c)	Scale, bulk, height Detrimental significant visual impact Harmful impact on the established landscape character and appearance of the area The site's rural setting
APP/L3815/W/18 /3206819 Foxbridge Golf Club Para 10.8	09/05/19	10 dwellings vehicular access	CLP 1, 2, 25, 26, 45	Effect on the undeveloped character and appearance of the Countryside. Noted the policy requirement to conserve and enhance the rural character of the area. Development would be heavily reliant on private cars and as such would be unsustainable

				development.
APP/L3815/W/18/ 3206331 Little Wephurst Para 10.9	17.01.19	Single replacement dwelling	CLP 33, 40, 48	Adverse impact on the character and appearance of the area. Massing and scale not sympathetic to its setting. Visible from several public vantage points.
APP/L3815/W/16 /3150857 Hardnips Barn Para 10.10	10.10.16	Wood store and Garden store on land adjacent to Hardnips Barn	CLP 1, 25, 45 NPPF paras 17 and 118	Unacceptable harm on the secluded rural character and appearance of the area. Effect on protected species and ancient woodland. Area consisted of undeveloped open countryside.
APP/L3815/W/15 /3141476 The Coach House Para 10.11	25.05.16	Change of use to a Club for Fitness Training, Yoga, Spiritual Healing and Wellbeing	CLP 2, 48, 39, 45	Effect on tranquil and rural character and appearance of the Countryside. Effect on the amenity of nearby Public Rights of Way. Unsustainable development. Surrounding roads lightly trafficked. The level of use indicated by the proposed parking would diminish the experience of those using the PROW. The facility would be reliant on private transport which is contrary to the sustainable development aims of the Local Plan and policies.
APP/L3815/W/15 /3134837 Nell ball Farm Para 10.12	22.03.16	Retention of an existing mobile home	CLP 1, 25, 33, 37, 45	Harmful visual impact on the character and appearance of the surrounding rural landscape. Conflicted with Planning policies that require development to enhance the character of the surrounding area with minimal impact on the landscape and rural character of the area.
APP/L3815/W/15 /3129444 Little Springfield Farm Para 10.13	01.03.16	Demolish Industrial buildings and erect three dwelling houses	CLP 1, 2, 33, 39, 48	Unsustainable development due to poor accessibility. Effect on the character and appearance of the area. Significant changes to the character and appearance of the location. Reference to framework which notes

				that the intrinsic character and beauty of the countryside should be recognised.
APP/L3815/C/15/3133236 Crouchlands Farm Para 10.14	10.10.17	Biogas plant without permission	CLP 25, 39	Highways safety. Local roads are narrow country lanes. Fears for safety caused through meeting lorries and walking on a road with no pavement, or when riding a horse or bicycle on the carriageway. Vehicle movements dangerous to other road users and caused disturbance to local residents. Effect on rural character of the area. HGV impact on tranquility, increased levels of intimidation and reduced residential amenity are experienced each time an HGV passes. Living conditions of nearby residents. Noise and vibration from the traffic would be unacceptable in this rural location and detrimental to the character of the area. Primary purpose of Agricultural land should be for growing food.

11.7 Sparrwood Farm | APP/L3815/W/20/327113 | Decision 19/05/2021 | Relating to the proposed erection of a Stable Barn and 25 X 50m Ménage.

➤ **Located 1500m from Application site.**

The main issue is considered to be the effect of the proposed development on the character and appearance of the area. It was noted that the scale and bulk and height of the proposed Barn would be significant and visually prominent and as a result would have a harmful and detrimental impact on the character and appearance of the area. It was noted that it would have significant visual impact on the site's rural setting and the area's established landscape character. The Inspector noted that the appeal site made a positive contribution to what is an attractive rural landscape surrounded by ancient Woodland and the benefit of extensive views from various public vantage points and concluded significant harm to the character and appearance of the open countryside and landscape character of the area would be contrary to Chichester Local Plan Policies 45, 48 and 55.

11.8 Foxbridge Golf Club | APP/L3815/W/18/3206819 | Decision 09/05/2019 | Concerning a development for the construction of 10 dwellings and vehicular access to replace the existing Golf Club.

➤ **Located 800m from Application site**

One of the main issues was considered to be the effect of the development on the character and appearance of the Countryside. The Inspector noted that whilst the impact of the proposal on the landscape of the area may not be severe, the proposal would nevertheless have an adverse effect on the undeveloped character of this part of the countryside. It would be seen as a substantial built development in a rural setting from Public Rights of Way and buildings in the surrounding area. The Inspector noted the policy requirement to conserve and enhance the rural character of the area, a matter in which he found some harm. In addition, the inspector noted that development would be heavily reliant on private cars and as such would not amount to sustainable development.

11.8.1 Little Wephurst | APP/L3815/W/18/3206331 | Decision 17.01.2019 | Relating to the erection of single replacement dwelling.

➤ **Located 1200m from Application site**

The main issue was considered to be the impact of the development of the character and appearance of the area. Where the Inspector noted that the massing and scale of the development would not be sympathetic to its setting and by virtue of the scale and massing, which could be viewed from several public vantage points and would have an adverse impact on the character and appearance of the area.

11.9 Hardnips Barn | APP/L3815/W/16/3150857 | Decision 10.10.2016 | Relating to the erection of a wood store and garden store on land adjacent to Hardnips Barn.

➤ **Located within the Application site**

The main issue was considered to be the effect of the building on the character and appearance of the area and the effect of the building on protected species and ancient woodland. The Inspector noted that the area consisted of undeveloped open countryside interspersed with other tracks of woodland of varying sizes giving the surroundings a secluded rural character and appearance not with-standing the proximity of the complex of large-scale farm buildings at Crouchlands Farm. The Inspector noted that the barn would be seen as an isolated and alien feature in hitherto largely underdeveloped rural surroundings and concluded that the building caused unacceptable harm to the character and appearance of the surrounding area and as such does not conserve or enhance the rural character of the area and quality of the landscape. The Inspector further noted that an increase in the level of human activity at the appeal site, as a result of the use of the single building and the use of artificial lighting in or around the building together with associated external storage, would all cause a further progression of erosion to the secluded rural character of the surrounding countryside.

11.10 The Coach House | APP/L3815/W/15/3141476 | Decision 25.05.2016 | Related to a change of use to a Club for Fitness Training, Yoga, Spiritual Healing and Wellbeing.

➤ **Located 3500m from Application site**

The main issue was considered to be the effect of the proposal of the character and appearance of the Countryside having regard to tranquillity and nearby Public Rights of Way and also whether the proposal would be a sustainable development. The Inspector noted that surrounding roads were lightly trafficked with the absence of any significant development and the surrounding character was resulting in a very tranquil area. The Inspector noted there would be sufficient parking for 25 cars, 10 motorcycles and 50 bicycles which indicated a significant intensification of activity within the tranquil area. The Inspector noted that based on the level of use indicated by the amount of proposed parking, the number of activities and intensity of use, the proposal would create the perception of a significant amount of activity on the site which would diminish the experience of those using the PROW in a tranquil area of the Countryside and would have an adverse effect on the tranquil and rural character of the area. The Inspector further noted that the facility would be reliant on private transport which is reflected in the proposed amount of parking and as such would run counter to the sustainable development aims of the local plan and policies.

11.11 Nell ball Farm | APP/L3815/W/15/3134837 | Decision 22.03.2016 | Concerned the retention of an existing mobile home.

➤ **Located 1600m from Application site**

The main issue was considered to be the visual impact of the development on the character and appearance of the surrounding rural landscape and concluded that the development would harm the character and appearance of the area conflicting with the Planning policies which require development proposals to enhance the character of the surrounding area with minimal impact on the landscape and rural character of the area.

11.13 Little Springfield Farm | APP/L3815/W/15/3129444 | Decision 01.03.2016 | Related to the proposals to demolish Industrial buildings and erect three dwelling houses.

➤ **Located 1500m from Application site**

The main issues related to whether the development would be a sustainable development with regard to the accessibility and the effect of the proposal on the character and appearance of the area. The Inspector concluded that the proposal would result in significant changes to the character and appearance of the location and referred to the framework which notes that the intrinsic character and beauty of the countryside should be recognised.

11.14 **Crouchlands Farm | APP/L3815/C/15/3133236 | Decision 10.08.2017 | Related to Highways safety, living conditions of nearby residents and the rural character of the area.**

➤ **Application site itself**

The Inspector noted the roads around Crouchlands Farm are narrow country lanes where traffic is likely to be restricted to the use by residents, the farm enterprise and occasional delivery vehicles and noted fears for safety caused through meeting lorries and walking on a road with no pavement or when riding a horse or bicycle on the carriageway. The Inspector further noted that in rural situations the impact on tranquillity, increased levels on intimidation and reduced residential amenity are experienced each time an HGV passes. The Inspector found that the vehicle movements proved dangerous to other road users and caused disturbance to local residents. Noise and vibration from the traffic would be unacceptable in this rural location and detrimental to the character of the area. The Inspector also noted that the primary purpose of Agricultural land should be for growing food.