



19th December 2025

Mr Calum Thomas
Senior Planning Officer
Chichester District Council
Sent via email: cthomas@Chichester.gov.uk

Dear Mr Thomas

Re: 22/02346/OUT Foxbridge Golf Club Foxbridge Lane Plaistow West Sussex RH14 0LB

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

The Parish Council **objects** to the above application for a large-scale hotel and holiday accommodation development on the former Foxbridge Golf Course.

The Parish Council recognises that tourism forms part of the wider District economy. However, this proposal represents a fundamental and unjustified departure from adopted planning policy. It would result in substantial and irreversible harm to the rural character and tranquillity of the area and it fails to meet the exceptional circumstances test required for development of this scale in the countryside.

This is not a modest rural tourism proposal. It is a major commercial resort development comprising up to 121 holiday units, and Hotel Spa with 50 bedrooms, a restaurant and farm shop (despite this not being a farm) together with extensive internal road infrastructure leisure facilities and year-round activity. The site lies within a deeply rural and tranquil landscape with limited accessibility and no settlement character.

Failure to demonstrate exceptional circumstances under Policy E8

Policy E8 of the Chichester Local Plan allows large-scale tourism development outside settlements only in exceptional circumstances where there is an overriding and compelling justification in terms of enhancing visitor use or appreciation of a specific feature or location of significant recreation or leisure interest.

The applicant has not met this test.

The justification put forward relies primarily on general district-wide tourism demand economic growth arguments and the absence of allocated sites elsewhere in the Local Plan. These are not exceptional circumstances. They are general conditions which apply across much of the District and were clearly anticipated when the Local Plan deliberately chose not to allocate countryside sites for large-scale tourism development.

If unmet visitor accommodation demand were sufficient in itself to justify development in the open countryside then Policy E8 would have no practical effect and large-scale tourism schemes could be promoted almost anywhere outside settlements.

The applicant has also failed to identify any specific feature or location of significant recreation or leisure interest that requires accommodation of this scale to be provided at this site. The site is not a designated attraction it is not adjacent to a nationally significant destination it does not provide access to a protected landscape and it does not host an activity that cannot be provided elsewhere. The former use of the site as a private golf course does not elevate it to the level envisaged by Policy E8 and its closure does not create a policy justification for intensive redevelopment.

Over-reliance on fragile and non-site-specific need evidence

The Visitor Accommodation Need Supplementary Report relies heavily on district-wide modelling including hotel occupancy rates and average daily room rates aggregated across Chichester District. This approach is not appropriate when used to justify a large-scale resort development in a remote rural location.

Much of the demand evidence relates to Chichester city coastal destinations and event-led tourism. No credible evidence is provided to demonstrate that this demand would translate into sustained year-round occupancy at an isolated countryside site. The assessment contains no sensitivity testing for location accessibility or seasonality. The muddy waterlogged paths of the winter and early spring would prove unattractive for year-round active travel pursuits and local visits would need to be by vehicle. This increases the traffic congestion the emerging Neighbourhood Plan is seeking to reduce in rural settlement centres, where formal tourist and retail opportunities do not exist.

High occupancy levels and rising room rates can also reflect yield management staffing constraints or deliberate capacity control by operators. They do not automatically demonstrate unmet demand requiring development in the countryside. The modelling relies on optimistic assumptions drawn from a limited time period and does not adequately account for the volatility of post-pandemic travel patterns, economic uncertainty or longer-term behavioural change.

The repeated assertion that occupancy levels above 70 to 75 percent demonstrate an immediate need for new accommodation is overly simplistic. It fails to reflect the seasonal nature of tourism in West Sussex and does not provide a sufficiently cautious or robust basis for a major planning decision.

Claims relating to second homes and housing pressure

The suggestion that the proposed development would reduce pressure on the housing market by diverting demand away from short-term holiday lets is speculative and unsupported by evidence.

No mechanism is proposed to prevent holiday units being used as investment assets. No evidence is provided to demonstrate that demand for short-term lets would be displaced rather than expanded. No binding controls are offered to ensure any net benefit to local housing availability. As such this argument should carry no material weight.

Scale layout and harm to the countryside under Policy NE11

Policy NE11 requires that development in the countryside is appropriate in scale and well related to existing buildings or settlements.

The applicant seeks to rely on a previous Council conclusion relating to a much smaller housing proposal which was considered to be well related to farm buildings near the site entrance. This comparison is misleading. The current proposal spreads-built development across the entire site with holiday units dispersed deep into open countryside. It introduces internal roads lighting activity and movement across a wide area and fundamentally alters the character of the landscape.

This is not development that is well related to existing buildings. It represents landscape-wide urbanisation and is wholly out of keeping with the rural setting.

Loss of tranquillity as a material planning harm

The application site lies within an area valued for its tranquillity including dark skies low traffic levels minimal night-time activity and natural soundscapes.

The introduction of a large number of visitor units a spa hotel restaurant, farm shop and associated servicing would result in a permanent erosion of this tranquillity. This harm cannot be mitigated by landscaping. Screening does not address noise light movement or the presence of sustained human activity. The loss of tranquillity is a material planning consideration and weighs heavily against the proposal.

Sustainability and accessibility

Although the applicant describes the proposal as eco-tourism the site is heavily car dependent. Public transport accessibility is limited and both staff and visitors would rely primarily on private vehicles. The local narrow rural lanes are not suitable for this increase in vehicular traffic. Visitors would also be required to travel off-site to access attractions services and facilities. This is not consistent with the objectives of genuinely sustainable development set out in the NPPF particularly when compared with more appropriate locations closer to existing settlements.

Economic benefits

The Parish Council acknowledges that economic benefits are claimed. However, construction employment is temporary and not place specific and many operational roles are likely to be low paid and seasonal. There is also a high risk of economic leakage with visitors spending significant time and money on-site rather than in surrounding villages. No assessment is provided of displacement impacts on existing rural accommodation providers.

Economic benefit alone cannot outweigh clear conflict with development plan policy particularly where the identified harms are permanent and irreversible.

Planning balance and conclusion

When assessed against adopted policy the planning balance weighs clearly against approval. The proposal conflicts with Policy E8 by failing to demonstrate exceptional circumstances. It conflicts with Policy NE11 through its scale spread and impact on the countryside. It would result in the loss of rural tranquillity and it represents an unsustainable form of development in an inappropriate location.

The benefits claimed are either overstated speculative or capable of being delivered in more suitable locations.

The Parish Council therefore respectfully urges the District Council to refuse planning permission. Approval of this scheme would undermine the integrity of Policy E8 set an undesirable precedent for large-scale countryside development and cause lasting harm to a valued rural landscape.

The proposal is not exceptional, it is not appropriate for the location and it does not represent sustainable development in planning terms.

Yours sincerely

J Bromley

Jane Bromley
Clerk & RFO of Plaistow and Ifold Parish Council

cc. email: dcplanning@chichester.gov.uk
Chichester District Councillors: Charles Todhunter and Gareth Evans