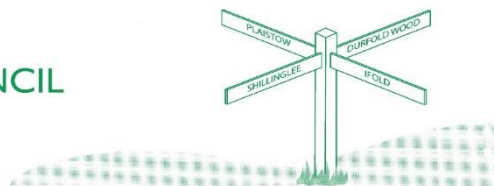


# PLAISTOW AND IFOLD PARISH COUNCIL



March 2023

## Chichester District Council Local Plan 2021- 2039

### Plaistow and Ifold Parish Council Submission - Regulation 19 Consultation

Plaistow and Ifold Parish Council considers that the proposed Chichester District Local Plan 2021 – 2039 complies with the three tests set out in the National Planning Policy Framework. To be specific:

- **we agree that it is legally compliant**
- **we agree that the council has satisfied the duty to cooperate**
- **we agree that it is ‘sound’ in that it is positively prepared, justified, effective and consistent with national policy**

In respect of the criteria of ‘soundness’ we endorse the strategic approach to housing allocations set out in the Plan and the proposal that Plaistow and Ifold parish should accommodate a maximum of 25 new dwellings on sites to be identified in a neighbourhood planning exercise. We consider this number to be properly assessed given the capacity of a relatively isolated rural community to support new development.

In anticipation that responses to the Regulation 19 consultation may raise alternatives to the Chichester District Council (CDC) strategy, **we wish to make the following points to explain why we consider its approach to be justified.** We have structured these around the three objectives for plan-making which are set out in the NPPF.

### **Economic Objective**

#### Parish location

The parish of Plaistow and Ifold is remote and isolated, set away from public transport links and completely reliant upon private cars. Of note, the nearest rail station to London - and other more *local* centres of employment - is over 11km away at Billingshurst. As acknowledged within the Sustainability Appraisal (SA) of the Chichester Local Plan “*the cathedral city of Chichester [...] is the main centre for higher order services, facilities and retail, as well as employment*”<sup>1</sup> and “*the majority of existing*

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<sup>1</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.3, pg., 2

*employment and business space is focused around Chichester City and the A27 corridor...<sup>2</sup>* Chichester is 36km away from the Parish – a 43-minute car journey, or a 41-minute train journey.

#### Additional infrastructure support

The level of additional development and strategic infrastructure that the area would require to increase and diversify economic activity, sufficient to support a higher housing allocation, would put the Plan in conflict with other key policies and the NPPF. In particular it would conflict with the objective of protecting and enhancing the natural environment and protecting and enhancing the area's heritage and character – being within the Northern Low Weald, recognised by CDC's [Landscape Capacity Study, March 2019](#) as having a low capacity to accommodate significant development, and in close proximity to the South Downs National Park (SDNP).

The development of significant amounts of additional infrastructure and higher order services and facilities could not be delivered in a timely way, to support a larger housing allocation and would put the draft Local Plan at odds with its objective to *“work with infrastructure providers to ensure the timely delivery of key infrastructure to support delivery of new development”<sup>3</sup>*. Consequently, inhabitants of new housing in the area will travel outside of the parish / North of the Plan Area, by private car, for employment and leisure thereby violating a key NPPF and Local Plan objective to mitigate climate change and reduce greenhouse gas emissions in line with CDC's Climate Action Plan and the longer-term Government objective to achieve net zero by 2050<sup>4</sup>.

#### Affordability

CDC correctly recognises that *“affordability is worsening, with median house prices in the district now 14 times the median earnings of those working in the district”<sup>5</sup>*. This is keenly felt within the North of the Plan Area where house prices are high *“relative to the southern plan area”<sup>6</sup>*. The types of employment necessary for commensurate salaries to afford houses within Plaistow and Ifold Parish are only available in the larger urban areas.

#### New settlement at Crouchlands Farm

The Council notes that the consideration of a new settlement at this site would centre around a separate / parallel proposal for a 'Whole Farm Plan' ([22/01735/FULEIA](#)), which proposes a range of employment opportunities associated with its Rural Enterprise Centre, Rural Food and Retail Centre, Equestrian Centre, Glamping Site and limited farming activity. However, the employment opportunities detailed in the planning application<sup>7</sup> bear no relation to the wider employment needs of the district, being highly specialised (e.g., ironworker, microbrewers, bakers, and jewellers<sup>8</sup>) and unrelated to the identified employment needs of the area.

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<sup>2</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.8, pg., 3

<sup>3</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.5, pg., 4

<sup>4</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.5.2, pg., 4

<sup>5</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 5.2.15, pg., 11

<sup>6</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 36

<sup>7</sup> Yet to be determined

<sup>8</sup> 22/01735/FULEIA - Planning Statement pg., 28 | Operational Statement pg., 8 | Transport Statement pg., 8.3.4

Therefore, the parish council strongly supports CDC's evidence that the Whole Farm Plan cannot be used as a basis upon which to determine the sustainability of a new settlement at the site, which is otherwise in a remote location, lies in open countryside, is poorly connected to population centres, and access to and from the site – especially for employment purposes - could only be by car. Rather than seek to maintain and support the economic viability of the existing local villages within its vicinity, the Whole Farm Plan proposes the creation of an 'out of town' style multi-enterprise commercial and leisure centre, which will draw patronage away from existing businesses and village centres (village stores, farm shops, butchers etc) and undermine the economic health of an established rural community.

The parish council supports CDC's assessment that a new settlement at Crouchlands Farm would not meet the requirements of paragraph 73 of the NPPF as it would not be "*well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).*" CDC are correct in their conclusion that the site fails to meet the requirements outlined at 73(a) and (b), namely: -

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access*

#### Economic objective conclusion

CDC has correctly considered the irrefutable fact that a higher allocation of housing within the parish cannot be supported by either the existing rural economy, or through the delivery of new economic development and other required supporting infrastructure. CDC states at page 37 of the Sustainability Appraisal (SA) of the Chichester Local Plan: "*there is little evidence to provide an economic argument for retail and employment development in this [northeast plan] area*" and the Council fully endorses this evidence-based conclusion.

The parish council supports CDC's assessment that "*it is difficult to suggest that higher housing growth would lead to significant benefits in terms of supporting any existing employment areas / companies locally or the rural economy in the local area<sup>9</sup>*", as illustrated above by the 'out-of-town' business model of the Crouchlands Farm 'Whole Farm Plan' and the types of employment opportunities proposed (e.g., ironworker, microbrewers etc). It is agreed that the housing development proposed by the Plan will bring carefully balanced benefits to the area e.g., the use of the existing village shops, pubs, and village halls. A larger allocation of housing would lead to unsustainable and unjustifiable levels of traffic movement in an area acknowledged to be rural and tranquil. When set against the social and environmental impacts (considered below) the limited economic benefit to the Parish is

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<sup>9</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

outweighed. As CDC have assessed, *“it is not clear that benefits would be significant or specific to the northeast plan area”*<sup>10</sup>.

## Social Objective

The parish has a low population with 1900 residents, with two small rural villages and two hamlets. Trying to absorb a large percentage increase would overwhelm the existing housing and population. Likewise, a significant housing allocation would radically alter the characteristic of this rural Parish – few would have any local connection and be drawn in from larger urban areas. As discussed in the Economic Objective section above, they would invariably commute out of the parish for work and leisure thereby adversely impacting the sense of community, belonging, cohesion and engagement. Consequently, the Council endorses CDC’s justification for allocating 25 houses to the parish, which is supported by the following factors: -

- Employment: Work opportunities in the parish are very limited and there are no large employers. Most people commute by car to larger urban centres. Those who work in the Parish mainly work from home in small businesses, generally self-employed or work for employers outside of the Parish, and so are not generating additional employment. Therefore, any larger scale development would essentially be dormitory and result in significantly more car journeys - impacting on that sense of community, belonging and engagement.
- Social facilities: The area is undoubtedly a beautiful and tranquil rural place to live. CDC recognise that new communities would *“benefit from living in an attractive rural area, associated with historic villages and high-quality countryside”*<sup>11</sup>. However, the area does not have the other required social facilities to meet the needs of a significantly expanded population. Existing residents must travel out by car to find suitable sports, leisure, entertainment, and shopping facilities. Even the larger scale development scenarios considered would not provide sports centres, cinemas, restaurants, shopping hubs and supermarkets.
- Social infrastructure: The area has limited, or at capacity social infrastructure. This includes both the local primary school and the secondary school in Billingshurst - which is outside of CDC’s Local Plan area and has experienced significant development which has impacted upon available secondary school places. Any proposed new primary school at the Crouchlands Farm site is in direct conflict with their planning application for the ‘Whole Farm Plan’, currently under consideration, which seeks an equestrian centre on the same footprint as the school. The Council agrees with CDC’s assessment of the Crouchlands Farm site that *“the potential for this number of homes to support a suitably comprehensive scheme is highly questionable”*.<sup>12</sup> The Council agrees with CDC that any new settlement within the parish could not ‘go bigger’ to comply with the Government’s Garden Communities Prospectus (2018) for at least 1,500

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<sup>10</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

<sup>11</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

<sup>12</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 35

home, as the area cannot feasibly deliver the other required infrastructure necessary to support greater housing numbers. The Council notes that there are *“three institutions in the Plan area that offer further education for 16–18-year-olds (all in the southern Plan area), including Chichester College, which is the largest further education institution in West Sussex”*<sup>13</sup>. Therefore, regardless of the size of any new settlement, young people will be commuting out of the Parish / North of the Plan Area to attend both secondary school and higher education with the associate traffic/transport adverse issues this entails. As CDC acknowledges, there is *“quite poor connectivity between the northern plan area and the southern plan area.”*<sup>14</sup> The Medical services in Loxwood are already stretched and are shared with Loxwood, Kirdford and Wisborough Green Parishes, which are all allocated further housing under the draft Local Plan.

- Alternative Modes of Transport: There is no adequate bus service for the Parish; there is no rail service and no link between the two public modes of transport. The closest main station is at Billingshurst, 11km away. Car ownership and use is essential to access any facilities, services, or work. Most households in the Parish own more than one car<sup>15</sup>. The Council agrees with CDC’s assessment that the area *“...is rural and not well-connected to higher order settlements...”*<sup>16</sup> The Council supports CDC’s evidence that *“growth locations would see high car dependency and a need to regularly travel longer distances, with no clear opportunities around growth supporting improved bus connectivity.”*<sup>17</sup>
- Affordability: The ability to afford to run a private car and/or access public transport is a key consideration for larger scale development in this area. The cost of living within the parish is high; for example, it is not sustainable to do your weekly shop at the village stores, due to the higher prices – you must commute out by car to the larger urban areas to find supermarkets. Whilst increased housing numbers will deliver more affordable and social housing, if those who live in them cannot afford to access other essential services and facilities, living in an expensive rural community becomes isolating and creates additional social and health problems, which are not directly addressed by the Local Plan within this area/or fall outside of its scope of influence. For example, there are no Children’s Centres, Libraries, Community Centres or Job Centres within walking distance / accessible by public transport, and it is unfeasible for such necessary infrastructure to be delivered in this area to support larger housing numbers. The local and national requirement to direct development growth to locations able to support a reduced need to travel, or facilitate sustainable travel, does not lend itself to situating larger scale development within the parish of Plaistow and Ifold. The Council fully agrees with CDC’s evidence and assessment that *“local accessibility to community infrastructure and sustainable transport connectivity are key considerations that have*

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<sup>13</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.2.7, pg., 3

<sup>14</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 37

<sup>15</sup> Evidence gathered during the Parish’s Neighbourhood Planning process

<sup>16</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 35

<sup>17</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 36

*influenced the strategy, with 'lower' growth [...] supported at the two parishes likely to be associated with highest car dependency.*"<sup>18</sup>

Similarly, the ongoing national switchover to electric vehicles might offer some mitigation to the adverse impact that high dependency on private cars has on climate change. However, this is predicated on the affordability of electric vehicles. Those in most need cannot usually afford to buy/run electric vehicles. The Council also notes, from its attendance at a recent seminar hosted by West Sussex County Council (WSCC) regarding EV charge point installation in the West Sussex area, that WSCC - working with their delivery partner 'Connected Kerb' - have no plans to install any public provision for EV charging in the Parish area. Billingshurst (11km away) would be the closest public provision. This is a further example of how Plaistow and Ifold Parish is unsustainable. It is not considered for the delivery of new public services, which are targeted at established settlement hubs. As previously illustrated, the Parish is poorly connected to these settlement hubs.

- Highway Infrastructure: The Council fully supports the Local Plan's aspiration to promote sustainable transport and ensure that development proposals prioritise walking and cycling as forms of active travel. However, the road network in the parish are all minor C class roads or unclassified local roads intended for local traffic; there are no A or B class roads. The roads are narrow country lanes without lighting and/or pavements. To support larger scale development costly road improvements would be required, which would likely be frustrated by the situation of listed buildings, the conservation areas and other environmental factors highlighted below within the Environmental Objectives section. As CDC correctly identify, the parish is distant and poorly connected to higher order settlements via minor roads<sup>19</sup>. The existing volume and speed of traffic already impacts adversely on residents, creating noise, danger and reducing the willingness to engage in active travel, such as cycling or walking to local facilities/services e.g., the church, or village shops. Existing residents are reluctant to engage in outside leisure activities, such as running and horse riding, on the road network. Larger scale development will exacerbate these issues, as private car usage is essential. As CDC states *"as well as concerns around per capita greenhouse gas emissions from transport, there is also a need to consider: issues of traffic congestion within village centres and along rural lanes; the potential to achieve good / safe vehicular access, and access for pedestrians and cyclists (this can sometimes prove challenging in rural settings...."*<sup>20</sup>
- Water and Sewerage: Basic amenities of water and sewerage are over capacity. The parish sewerage network links directly to Loxwood pumping station and treatment works, which is at capacity. New development in Loxwood is not connected to mains foul drainage, but resorts to underground storage with effluent taken away by road tanker. This is not sustainable or appropriate development, increasing risks of pollution and vehicle movements. The Council

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<sup>18</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 9.6.4 pg., 50

<sup>19</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 14

<sup>20</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 59

agrees with CDC, that the level of allocated development within this area needs to be supported by sustainable and deliverable infrastructure from partner agencies, such as Southern Water. The Council agrees with CDC's assertion that *"there is typically potential to deliver capacity upgrades, but there can be challenges, hence there is a case for directing growth to locations with existing capacity, with a view to avoiding the risk of capacity breaches."*<sup>21</sup> Southern Water's ability to meet and manage higher capacity, in a timely manner, is outside the direct control of CDC and has, to date, been unable to cope with the greater demand on its infrastructure from new development within Loxwood village and the surrounding area. There is already a disconnect between the demands of existing new development and Southern Water's ability to address these. The foul drainage system which runs from Plaistow through Ifold suffers from overflow during heavy rainfall, with manholes lifting and raw sewerage running down the roads in Ifold and sewerage backing up in people's homes. Southern Water have been unable to address these ongoing public health concerns, which will be exacerbated by larger scale development.

The Council is fully cognisant of the limitations that water neutrality poses in this area and supports any Mitigation Strategy which can deliver a workable solution. The Council would support CDC's suggested 'precautionary approach' with respect to the growth numbers the North of the Plan Area *might* be able to support i.e., a further reduction of 5 – 10% *"given the inherent uncertainties underpinning the Mitigation Strategy"*<sup>22</sup>. It recognises that more work needs to be done to *"identify and design offsetting schemes, before the Strategy can be implemented"*.<sup>23</sup>

The Council notes and understands the inflexibility of the agreed Mitigation Strategy to be amended to reflect higher growth within the Northeast Plan Area. The Mitigation Strategy covers the WRZ, which includes areas outside the Chichester District. These areas will also be delivering additional development, as part of their own Local Planning process, and, in many cases, these areas are more suitable for larger growth than the rural parish of Plaistow and Ifold. Consequently, the Council fully endorses CDC's argument that *"it would be very challenging to justify restricting growth in Crawley or Horsham [established settlement hubs, which are currently used by parish residents to access education, work and leisure] to allow for a high growth in the Chichester northeast plan area, which is relatively poorly suited to a high growth strategy in wide-ranging respects, as a relatively rural area."*<sup>24</sup>

- **Education:** Secondary school places for children in this parish fall outside of the Chichester District, in places which have seen significant development. Children from the parish must commute to either Billingshurst (Horsham District) 11km away, or Midhurst (within the SDNP) 23km away to attend secondary schools. The Council notes that transport concerns have been raised by neighbouring Waverley Borough and Horsham District. Likewise, Surrey County

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<sup>21</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

<sup>22</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 16

<sup>23</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 16

<sup>24</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 16

Council have highlighted their concerns “regarding higher growth in the northeast plan area on transport grounds, highlighting the poor public transport connectivity and general rurality of the area”<sup>25</sup>. Any expansion greater than the 25 dwellings proposed in the Plan would necessitate a large number of additional journeys to be made which would be unsustainable.

### Social objective conclusion

As CDC have considered, these various social drawbacks “relate both to the unsuitability of the northeast plan area as a whole, as a location for significant growth, including around unsustainable travel patterns and risks to achieving water neutrality”<sup>26</sup> The Council agrees with CDC that some sustainable growth will bring benefit to the existing community in terms meeting local need for some affordable housing and supporting local services to ensure village vitality. However, for all the reasons outlined above, larger scale development would be unsustainable and in direct conflict with other Local Plan policies and the NPPF, particularly paragraph 73.

Therefore, the Council fully supports CDC’s decision to “direct growth to the most accessible and best-connected locations, including villages with train stations and good public / active transport options”<sup>27</sup> in compliance with the NPPF.

## **Environment Objective**

### Landscape

The parish is rural and borders the SDNP and part of the Parish is within the SDNP. The landscape is intrinsically part of and supports the designated area of the SDNP. The parish landscape is as valued and valuable as that in the nearby Park. The parish has been recognised as being remote and tranquil and has good levels of biodiversity with low density small villages and hamlets. The parish predominantly has dark skies and limited light pollution. This helps to support the SDNP; nature does not recognise arbitrary man-made boundaries and makes no distinction between this parish and the SDNP. There is therefore a duty to work with the SDNP Authority to provide protection of the Park.

The parish landscape is recognised in CDC’s [Landscape Capacity Study, March 2019](#) as having low, medium/low and medium capacity to accommodate new development. Therefore, the landscape in the parish has been identified as having no ability to accommodate larger scale development, without significant adverse impact. As discussed at length above, delivering more dwellings cannot be considered in isolation; larger populations and new settlements need to be supported by a variety of other social infrastructure, not simply a primary school, which cannot be met within the capacity of the parish landscape. The Council fully endorses CDC’s approach to conserve the rural character of the area; its high-quality landscape; and, to minimise the impact on the historic environment. As set out in the NPPF’s overarching objective, it is not acceptable for the needs of the present to compromise the future; therefore, to inflict irreversible damage to the parish’s rural landscape to build an unsustainable number of dwellings would be disproportionate and unjustified.

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<sup>25</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 39

<sup>26</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 40

<sup>27</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, pg., 19



Any new settlement at Crouchlands Farm would immediately adjoin the area of Plaistow and Ifold Low Weald, sub-area 156, which is found to have low/medium capacity for development, the conclusion states:

*Sub-area 156 has a medium / low capacity, constrained by its reasonably rural character, distinctive topography and 'knolls' and its role as an integral part of the rural setting of nearby settlement and conservation area. The area is well-served by PROW with links to the South Downs National Park. There are panoramic, mid and distant views, particularly towards the south and south-east from PROWs and views from tracks, rural lanes and the conservation area. The area retains a clear sense of history through its historic medieval assarted field pattern, presence of many listed buildings and their settings, historic farmsteads, and the historic settlement core. Has a strong, cultural association with the iron working industry. Many areas of ASNW and SNCI's present. The area contains many of the characteristic features typical of the wider LCA, well used and travelled by locals and visitors although tranquillity has been negatively affected by traffic and aircraft noise, and suburban elements, including paddocks, equestrian uses, and modern styles of housing around the settlement edge.... .....It is possible that a very small amount of development may be accommodated within existing clusters of farmstead settlement, larger garden plots, paddocks or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and locally distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. New development in this area would extend the built edge southwards and eat into adjacent paddocks and historic fields. Although the flat land and vegetation structure provides opportunities for small scale barn/ single house forms of development, within paddocks, this would further dominate the village edge and add pressure to sensitive ecological and landscape features. The combination of these factors would result in a largely negative effect on settlement pattern.*

The landscape at Crouchlands Farm is not dissimilar to the adjoining sub-area 156 and many of the statements above apply equally - it is well traversed with PROW, with long and short views; there are ancient woodlands, historic links to glassworks, and is valued by the local community. Dismissed appeal decisions concerning modest development both at the Crouchlands Farm site itself and in the immediate vicinity (within metres of Crouchlands Farm) have referenced the importance of the character and appearance of the landscape: -

- APP/L3815/W/22/3296675 | Little Wephurst, Walhurst Lane, RH14 OAE | Located 1200m from Crouchlands Farm | Development of a replacement dwelling following demolition of an existing dwelling.
- APP/L3815/W/18/3206819 | Foxbridge Golf Club, Foxbridge Lane | Located 800m from Crouchlands Farm | Development of 10 dwellings and vehicular access to replace the existing Golf Club.

- APP/L3815/W/16/3150857 | Hardnips Barn | Located at Crouchlands Farm | Development of a wood store and garden store on land adjacent to Hardnips Barn.

The development of a new settlement within the parish would have a severe detrimental impact on the landscape. Further, this land was previously a productive working dairy farm – before its unlawful use as a biogas plant (confirmed in the 3 Appeal Decisions reference APP/L3815/C/15/3133236, 3133237 and 3134445) – therefore, any significant development would prevent any reinstatement of its former agricultural use.

The Council notes Government’s aspiration within the proposed changes to the NPPF to strengthen the protection afforded to land valued for food production to *“make sure that the food production value of land is reflected in planning decisions that we propose will take effect from spring 2023”*. The value of land for food production is not only its ability to grow crops, but also to graze livestock e.g., dairy and beef farming.

Government also seeks to allow LPAs and communities to take into consideration an applicant’s past irresponsible behaviour<sup>28</sup>.

The location promoted for a new settlement at Crouchlands Farm within the parish has not been carefully and purposely considered but has a purely commercial motive to recoup losses arising from investment in an unlawful use of the site for biogas production by its ultimate owner which is Prestige Alternative Finance Fund Limited (registered in the Cayman Islands). Appendix A of this representation is a communication to investors in the Fund and appendix 1 of the Prestige Alternative Finance Impairment document, says: *“The Fund formed Artemis Land & Agriculture and recruited a specialist management team to create a Rural Diversification Plan for Crouchlands Farm in West Sussex...”*. Whilst the Fund is entitled to promote the site, CDC is absolutely correct to reject it as unsustainable and ill conceived.

### Biodiversity

The parish has extremely good levels of biodiversity with large tracts of woodland, many of which are designated Ancient Woodland, ancient hedgerows, and medieval field patterns. The settlements are all low density with very high levels of tree cover, particularly in Ifold. The Parish is within the SSSI Impact Zone for Chiddingfold Forest SSSI (Site of Special Scientific Interest) and within the Zones of Influence of The Mens Special Area of Conservation (SAC) and Ebernoe Common SAC, both of which have been designated for their bat populations, particularly Bechstein and Barbastelle populations.

There are many protected species within the parish, including badgers, dormice, great crested newts, and adders, including many nocturnal species, particularly the rare Bechstein and Barbastelle bats. The parish also provides habitat for the extremely rare Woodland White butterfly. Larger scale development is likely to have a detrimental impact, with higher density housing resulting in loss of trees and hedgerows and green fields. Development brings noise, human disturbance, vehicle movements and light pollution. The parish, with its low housing numbers, has little light pollution and there is no street lighting within the existing settlements. This contributes significantly to the SDNP

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<sup>28</sup> [Levelling-up and Regeneration Bill: reforms to national planning policy](#) | Chapter 5, paras 18 - 22

dark skies policies, supported by the Council. The Council considers that any development above the level proposed by CDC in the new Plan would be unacceptable and inconsistent with the policy requirements of the NPPF (and the emerging NPPF subject to consultation at the time of writing this response).

#### Climate change / Climate emergency

The Council supports the draft Local Plan's recognition of the Climate Emergency and the need to address climate change via strategic policies. The Council endorses CDC's conclusion not to promote unsustainable larger scale development within the parish due to its high dependency on private cars to circumvent its remote rural location, poor transport links, limited local employment, poor infrastructure, and amenities – which cannot be addressed through additional development.

CDC Climate Emergency Policy states:

*'Locating development is the heart of the plan making process. The following are all top priorities in plan making.*

- *Reducing the need to travel to access shops, employment, and facilities.*
- *Providing development in locations where there are ample opportunities to walk, cycle and use public transport, rather than car use being the only reasonable option'*

The Council supports the draft Local Plan's objectives regarding climate change, the natural environment and design and heritage and applauds CDC for their efforts with the draft Plan to account for the impacts of climate change by locating development in the right place.

#### Environmental objective conclusion

The Council supports the need to provide good quality, affordable housing and agrees that some growth in the parish would be beneficial, but this must be limited to that which is sustainable and would have an acceptable environmental impact. The Council fully supports the draft Local Plan's allocation of 25 houses. This allocation is rational, well balanced and, above all, a sustainable response when considering the various limiting factors within the area and the parameters of the NPPF.

#### **Summary**

Plaistow and Ifold Parish Council considers that the CDC 2021 – 2039 Local Plan as submitted is sound based on the allocation of 25 additional homes to the parish. CDC's evidence correctly holds this level of development to be the maximum which is possible given the level of supporting infrastructure. It is also the maximum that could be accommodated before there is a detrimental impact upon the area's landscape, biodiversity, and the setting of the SDNP. It will afford the community the ability to *"deliver suitable, well designed, energy efficient and affordable housing to meet local needs..."*<sup>29</sup> via a

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<sup>29</sup> Sustainability Appraisal (SA) of the Chichester Local Plan, para 2.5.2 pg., 4

Neighbourhood Plan; and will guard against coalescence of distinct settlements, either within the parish itself, or with the adjoining Loxwood Parish closing further the green gap. It will enable the new dwellings to be carefully integrated within the parish's distinct landscape and heritage, taking into consideration the Conservation area in Plaistow and the parish's historic, listed buildings.

The Council acknowledges and commends the huge amount of work and effort by CDC Officers in preparing the Plan. We trust that it will be accepted as meeting all the necessary tests and eventually adopted in this form. **If the Inspector decides to hold any round table discussion, or seeks further evidence on housing allocations during the examination which would impact on Plaistow and Ifold, we would wish to participate.**

Yours faithfully



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