

Chichester District Council Planning Department
East Pallant House
Chichester
W Sussex

7th February 2019

via email planningpolicy@chichester.gov.uk

Dear Sirs

Chichester District Council Revised Local Plan Preferred Approach - consultation December 2018 to February 2019

Plaistow and Ifold Parish Council have considered the above document and wish to make formal representation regarding a number of policies contained within this local plan review as follows:-

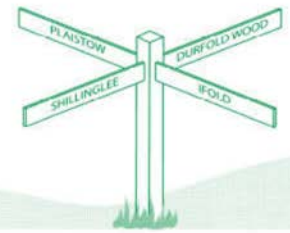
1) Policy S2 Settlement Hierarchy

Plaistow and Ifold Parish Council OBJECT to Policy S2

The settlement hierarchy as presented in policy S2 is unsound as it promotes development and resident lifestyles for this Parish which do not meet sustainable criteria; social, economic and environmental. This is contrary to the NPPF and CDC's own Spatial Planning Vision, as set out in the revised local plan preferred approach and Policy S1, to secure development that improves the economic, social and environmental conditions in the area.

The Parish Council is disappointed that our earlier representation has not been recognised and we make the same points which we have made since 2015. Further the points we raise are well founded in the evidence the Parish Council has gathered and collated through the drafting of its Neighbourhood Plan, which now resides with CDC at Regulation 15/16 and only awaits CDC staff resourcing to move forward to Regulation 16 consultation, having successfully completed a central government funded Health Check by a Planning Inspector.

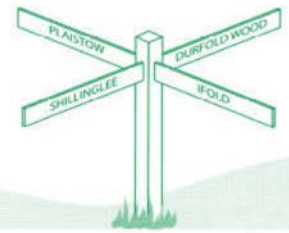
The two settlements of Plaistow and Ifold have been designated as one service village in the revised local plan. This is an unsound designation which does not meet the requirement for sustainable development. Ifold has been designated with a settlement boundary and Plaistow village has not, resulting in a further lack of sustainability, as set out below.



Plaistow Village could be regarded as a service village on its own merits as it has a reasonable range of facilities for a rural village, namely a primary school , a shop , a public house, a church, a village hall, and recreational /sports facilities including Village Green with cricket pitch and pavilion and tennis court and a football pitch with pavilion. All within reasonable walking distance for those within the confines of the village. However it does not have a settlement boundary and is therefore in the countryside. Countryside policies apply restricting future development and thus reducing the ability of the settlement to meet the identified needs of the community for smaller residential units, housing suitable for the elderly and affordable housing, intermediate and market, to ensure a healthy and vibrant mixed community supporting local services and facilities . Such development would fall within the parameters of sustainable development, provided it recognised the remote rural nature and special characteristics of the village and its limited services and local employment. The lack of planned sustainable development within Plaistow means that for services and facilities in the village to be retained they are dependent on the other villages and settlements of Ifold and Kirdford and to a lesser extent Loxwood to survive. Over the past 20 years Plaistow has lost a pub , a shop and a repair garage.

Ifold is a separate settlement from Plaistow located 2.5 km (1.5 miles) away by road. It has very limited facilities , with just a community Hall with car park and repair garage, no public open space, no recreation facilities or childrens playground and no shop. Other than school children accessing the school bus there is no means other than driving by car or taxi to access even day to day facilities; commercial bus services are too infrequent. The narrow country lane road link to Plaistow operates at 40 mph and 60 mph with no footpath. West Sussex County Council Highway Authority deemed that the road is unsafe for pedestrians to walk and have had to provide a free school bus service. The local country footpath network is too indirect to usefully serve pedestrian access between Ifold and Plaistow. Therefore, in terms of reasonable access to services and amenities, Ifold is not a sustainable settlement or one where planned development should take place unless the development improves the provision of facilities and amenities. As a settlement of some 470 houses, using the criteria that CDC outline at Open Space Sport and Recreation for new development, Ifold should at least have public amenity space / recreation ground, children's and youth play space, within 480 -600m straight line walk by residents.

The lack of sustainability for Ifold is further compounded by unfettered windfall development. The settlement has a settlement boundary which the Local Plan at review currently maintains. The characteristic of Ifold as an extremely low density settlement and the designation of a Settlement Boundary in 1990 has only succeeded in creating a less and less sustainable settlement. In 1990 Ifold had approximately 320 houses set in gardens ranging from 1/3 to 5 acres, creating large areas of heavily treed green space. The introduction of the

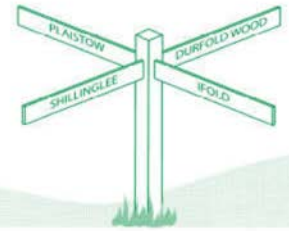


Settlement Boundary allowed for a 'presumption' in favour of development and resulted in continual windfall development and a settlement which currently stands at approximately 470 houses. The development of 150 houses in this one settlement has all been by unplanned windfall development of 5 or less units and therefore no provision has been made for public open space and recreational areas, footpath links through the settlement or other facilities which would be expected in a settlement of this size. Further there has been a degradation of the biodiversity with loss of valued green space and trees due to pressure of development and increasing density. The unrecognised windfall development of this magnitude has resulted in severe impacts on infrastructure, with significant surface water and foul drainage issues, with flooding and sewerage discharge to roads and gardens. The foul drainage from Ifold, Plaistow and Durfold Wood runs to the Brewhurst Treatment works at Loxwood which is now at capacity. (Further details supplied in Loxwood PC consultation response). No provision has been made by the relevant Authorities to accommodate such level of windfall development. The lack of capacity for foul water drainage for Plaistow and Ifold Parish and Loxwood Parish is not recognised by this current Local Plan Review in the SA document, nor the time required to update the drainage infrastructure.

By linking Plaistow and Ifold as one Service Village does not negate the physical geography of access to facilities and it only serves to mask the lack of facilities within Ifold and 'hide' its lack of sustainability. The designation of the settlements of Plaistow and Ifold with or without a settlement boundary results in outcomes which do not meet sustainable criteria. It does not address the vitality of Plaistow village and results in continued levels of development in Ifold which are not sustainable. The review of the Local Plan does not address these issues but continues to reinforce them and weakens the use planning policy can make to improve the residents life and well being in this Parish. The P& I draft neighbourhood plan seeks to address this issue but as yet is unmade.

The Revised Local Plan therefore in this Policy for this Parish fails to meet the Spatial Planning Vision set out by CDC;

- it does not afford dwellings to suit incomes, needs, lifestyle and stages of life
- it does not follow a socially responsible and more environmentally friendly way of life, in the knowledge that the natural environment and biodiversity of the Parish is being conserved managed and enhanced
- it does not pursue a healthy lifestyle and benefit from a sense of well being supported by good access to ... health, leisure, open spaces.. sports and other essential facilities for the majority of residents in this Parish
- it does not allow residents in the Parish settlements to live in sustainable neighbourhoods supported by necessary infrastructure and facilities.



- it does not allow our residents to move around safely and conveniently with opportunities to choose alternatives to car travel

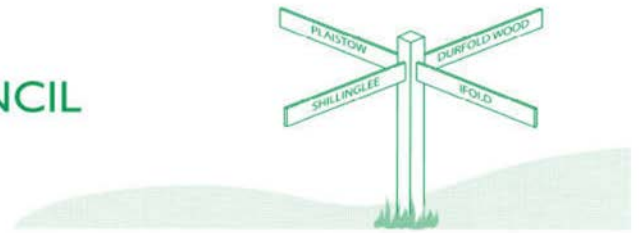
2) Policy S4 Meeting Housing Needs and Policy S5 Parish Housing Requirement 2016-2035

P&I Parish Council take issue with some of the statements made in these two Policies relating to the identification of the housing number for the North Plan area and the distribution of new housing. In the Spatial Vision and strategic Objectives para 3.14 it states that '*for the North of the Plan area the emphasis will be primarily upon maintaining the rural character of the existing villages whilst enabling the local communities to become more self reliant in meeting their local needs*' and again at 3.16 '*balancing the need to retain the rural character of the area with the issue of addressing local housing needs and affordability*'.

It is unclear from the Local Plan or the evidence base how a figure of 489 housing provision for 2016-2035 has been derived based on the four Parishes identified housing need. All the Northern Parishes have undertaken Neighbourhood Plans and gathered evidence on their need. But there has been no discussion with this Parish Council, and none with Loxwood Parish Council by CDC Planning Officers to consider the evidence and to identify what is our evaluated local need or what is required to maintain our local services. The P&I Parish Council believes the allocation for the North Plan Area far exceeds the amount of housing to meet our local need and will result in inward migration from other areas. It does not meet our assessed local need and results in unsustainable development arising from limited local employment, limited village services and facilities requiring new residents to travel out of area by car. It places significant impacts on infrastructure- roads, foul drainage and schools, both at Primary and Secondary level and medical services. In addition such development will significantly impact on the rural character of the villages and the sensitive biodiversity and landscape.

The Northern Area villages have already made provision for 190 houses of the 489 now proposed to be allocated and these in the main have yet to be built and the impact absorbed into the small scale communities; this current planned development will result in significant percentage increases in the size of the villages. To further add another 150 houses and then to centre the majority on one village will increase still further the amount of unsustainable development and its impact and does not meet Policy S1.

Further, the proposed allocation for the North area of 489 is not met by the 190 houses already allocated and the proposed 150 houses, but will require a further 149 houses to be allocated sites by 2035



or to be met out of unknown unplanned levels of windfall development, as already seen in Ifold. Overall this level of additional development which amounts to an average of 122 new houses to each of the four service villages, if treated equally, will irrevocably change the character of our small villages and place significant pressure on infrastructure and the environment. This is completely at odds with the Plan statement at 3.14 and Policy S19, to maintain the rural character of the existing villages, conserve and enhance the historic environment and the high quality landscapes. CDC has not demonstrated that more housing will make the villages more self reliant, nor that new housing will be any more affordable for local residents not on a housing waiting list. Local employment may increase marginally in local service areas but often these are low paid which would not support local residency. Some new residents may be able to work from home but these have not been shown to employ any level of additional local residents. As stated at para 3.15 the majority of residents will still predominantly look outside the area for employment and major services. Residents will inevitably resort to on line shopping to meet their needs. Thus increasing further vehicle usage with more people commuting and not result in a significant increase in local service provision or support.

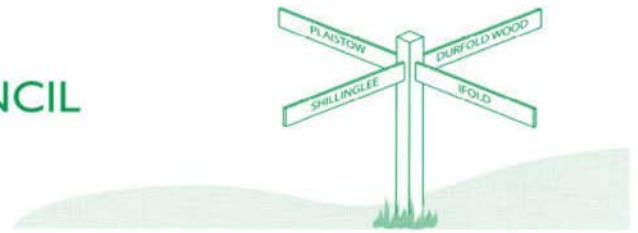
For these reasons Plaistow and Ifold Parish Council consider the CDC revised local plan approach in respect to the North of the Plan Area to be flawed and results in increasing levels of unsustainable development for the North of the Plan Area which neither meets CDC Policy S1 or the NPPF

3) Policy S6 Affordable Housing and Housing Mix DM2

The Parish Council welcomes the Policy on affordable housing and the more detailed requirement for open book valuations on viability. However it is hoped that the practice of 'bench marking' land values and the high profit margins of developers are robustly challenged by the District Council. Recently these practices have resulted in land owners and developers receiving excessive returns at the expense of the provision of affordable housing. A return to residual valuations to determine land value, which includes adequate calculation and financial provision for the known affordable housing element and the housing mix, in order that these planning obligations can be met, would be beneficial. This would ensure that the right housing development is undertaken to meet our needs.

4) DM 3 Housing Density

Whilst it is necessary to make economic use of land a balance must be drawn with what is appropriate for an area. This policy is too narrowly defined and does not make specific provision for appropriate density levels in rural areas and villages which do not have specific statutory protection but still have considerable merit and distinctive character worthy of careful design to protect it. Density levels of 34 units to the hectare would be significantly impactful and out of character in the majority of countryside and



village locations in the District and such density levels would rarely be acceptable in any rural or village location. This Policy conflicts with Policy DM28.

5) DM35 Equestrian Development

It is accepted that large equestrian businesses do provide some rural employment, often at minimum wage. However the Parish Council is concerned that this Policy provides no protection for and retention of viable agricultural land and farm units, meeting the need for food production. This rural Parish has seen the loss and break up of a number of farm units arising from change of use to equestrian and pressure for further associated development.

6) Inaccurate Map annotation

Plaistow AND IFOLD Parish Council draw CDC attention yet again to the wrong name being used for this Parish. Map A3 and Map B1 both only refer to Plaistow , please can you amend and amend your records as this is a constant mistake. Also Map 4.1 Key Diagram only shows the settlement of Ifold and not Plaistow even though they are designated one service village.

Plaistow and Ifold Parish Council ask that the above objection and comments are taken into consideration in moving forward to the next stages of completing the Local Plan review.

Yours faithfully

Catherine Nutting

Clerk to Plaistow and Ifold Parish Council

cc District Cllr Wilding and District Cllr Ransley
Kirdford Parish Council , Loxwood Parish Council and Wisborough Green Parish Council