

## **Plaistow and Ifold Neighbourhood Plan Pre Submission (Regulation 14)**

### **Chichester District Council Response – October 2017**

The Parish Council and Neighbourhood Plan Working Group should be commended for the hard work that has been put in to this plan to date. The Council recognises that there have been a number of challenges for the NP group to address as work has progressed to this stage.

#### Page 3: Introduction

This section will require on-going updating as the draft NP is progressed.

Paragraph 1.2: makes various references to a hall, scout/girl guide HQ and a church hall, however in paragraph 5.22 under AIM – CI4 there is only reference to the Holy Trinity Church. It is suggested that this should also include Kelsey Hall, Winterton Hall (referenced in paragraph 3.7 on Page 7), the Youth Club and any other important community buildings (see also the wording of 5.1 objectives, 5.20, 5.21 and 5.22 for consistency of approach).

Paragraph 1.3: Currently the development plan also includes the saved policies from the Chichester Local Plan – First Review (April 1999) for the South Downs National Park Authority (SDNPA) area.

#### Page 9: Policy EH1 – Protection of Heritage Assets

The policy may benefit from some minor rewording to improve its readability.

#### Page 10: Policy EH2 – Protection of the Natural Environment

It is suggested that the wording may be improved if the policy (along with others) was worded in a more positive way in accordance with guidance throughout the NPPF (including paragraph 16).

It is not clear what is meant by 'rural areas'; is the intention that this includes all areas outside a settlement boundary?

4<sup>th</sup> bullet point – the inclusion of the word 'trees' is considered to be too broad, suggest that the sentence is finished after using the example of Ancient Woodland. Last paragraph (line 3) it is suggested that Arboricultural Impact Assessment should be replaced with Phase I Habitats survey and any required subsequent surveys as this more appropriately relates to this policy concerning the wider Natural Environment. The issues concerning trees are better addressed via Policy EH3 (Protection of Trees, Woodland and Natural Vegetation).

#### Page 12: Policy EH4 – Local Green Spaces

The first paragraph refers to the policies map but no map is included in the document. If a separate map is to be included showing the various sites this should be referenced and the boundaries of each site clearly identified. The text at the end of the policy may not be necessary as the designation itself affords protection as set out in the NPPF.

It is suggested that the local green spaces proposed are checked against the criteria set out in the NPPF as not all of those currently included appear to meet these requirements. For example the inclusion of a single tree does not appear to have sufficient justification for such an area designation. In addition some of the areas may already be sufficiently protected by their use as open space.

Page 13: Policy EH5 – Lighting Emissions (External Lighting on Buildings)

Final bullet – would this criterion also include lighting that may be required in for example a courtyard for guidance or security purposes?

Page 14: Policy EH6 – Street Lighting

Suggest the inclusion of additional text along the lines of ‘...unless required for highway safety or security.’

Aims – this section may be better located along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan. This would be easier for people to find.

Page 15: Chapter 5 Community Infrastructure

This section would benefit from reference to Community Assets, particularly as the Village Shop is on the register.

Page 16: Policy CI1 – Reducing and avoiding Flood Risk

Second para of 5.6 - it would be more accurate to refer to Flood Zones 2 and 3 rather than to use the wording ‘high and moderate risk’. Also the exception test is not always required and therefore it is suggested the wording is amended to read ‘...by the Sequential and Exceptions test, **where relevant in accordance with the NPPF requirements.**’

Page 18: Aims

Again, this section may be better located along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan. This would be easier for people to find.

Page 20: Policy H1: Land Opposite the Green, Plaistow

Amend wording to refer to a **minimum** of 11 units to be in accordance with the adopted Chichester Local Plan: Key Policies 2014-2029.

The use of the word ‘bespoke’ is likely to be too restrictive, suggest some minor re-wording.

In order to make the policy more flexible if circumstances change it is suggested that the following wording “unless robust evidence can justify an alternative mix” be added to the end of the following statement “meets the identified Parish Housing Need of small 1, 2 or 3 bedroom units, with some accommodation suitable for older residents”.

Last bullet point – suggest that the reference should be to the whole Village Design Statement and, in particular, the section on Plaistow; as written the remainder of the document would be diluted and not necessarily relevant.

Page 23: Policy H3: Affordable Housing

It is suggested that reference is made to CDC’s development plan regarding the affordable housing provision requirement. The following sentence should be removed as it is contrary to CDC’s Allocation Scheme “Priority will be given to those people with a local connection to this Parish or neighbouring Parishes”.

Page 24: Policy H4 – Housing Density and Design Principles

4<sup>th</sup> bullet point – the reference should be to West Sussex County Council car parking standards; justification and evidence will be needed for these to be considered as minimum standards.

5<sup>th</sup> bullet point – it is not clear where the densities are set out as this is not indicated or referenced. Should the reference be to Policy H4?

Page 26: Policy EE1 – Live/Work Facilities

Is the aim of this policy to deliver live/work units per se or to support working at home more widely?

Question if there is sufficient evidence of demand to support live/work units. Other than the census figures showing that 10.7% of the economically active work from home in the area, what other justification does the NP group have for live/work units?

Also it is not clear when the information to assess the business would be requested. For example, at planning application stage it may be the case that it would be too early in the development of the business to know the number of staff employed and/or vehicle movements etc.

The inclusion of the criterion referring to ‘personal permissions’ would be contrary to government guidance in the NPPG. In addition what is meant by vehicle movements and how would this relate to hours of work? This is likely to be unenforceable.

Page 27: should the objective in para 7.9 also refer to equine facilities to be consistent with para 7.10?

Page 27: Policy EE2 – Supporting the Local Economy

Generally support this policy although it could be improved by including reference to Chichester Local Plan: Key Policies Appendix E. Appropriate Marketing Guidance. This gives an indication as to what evidence will be required to show that adequate marketing has been carried out. Currently the NP does not give any guidance on this point.

Para 3 – there needs to be a clear definition of what is meant by rural based activities, what is included?

Page 27: Policy - EE3 Retail Shop Premises

The protection of retail uses is supported. However, currently as worded there is no indication as to how/when such a loss or alternative use is to be considered. Currently this is not included in the policy. It is suggested that it may be beneficial to link this to the need for evidence from a marketing scheme to be required in any such circumstances (for instance as suggested with Policy EE2 above).

Policy EE4 – Brownfield Site

Object to the inclusion of this site as it is physically and visually separated and divorced from the settlement. In addition there are concerns about the viability and deliverability of the various uses proposed. Its inclusion provides an inconsistent approach to development in terms of neighbourhood plan proposals in the LPA area. There is no map to show the site and the site has not been considered as part of the SEA process which is regarded as a serious procedural omission.

Page 30: Policy T1 – Ensuring Highway Safety

The reference should be to West Sussex County Council car parking standards; justification and evidence will be needed for these to be minimum standards.

Second para would benefit from the inclusion of reference to 'refuse vehicles'.

Page 31-32: Aims

As above, this section may be better included as part of a wider section along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan.

Monitoring

There is no indication or section to show how the neighbourhood plan and its policies will be monitored and delivered. This may require some further consideration and inclusion prior to the submission of the draft plan.

**Exercise of Delegated Authority - Head of Planning Services**

I hereby exercise my delegated power in accordance with Chichester District Council's Constitution:

'to make formal comments on a draft Neighbourhood Plan at Pre-Submission stage and Submission stage'

AND DETERMINE THAT, the above comments are the formal response made by Chichester District Council on the **pre submission stage** of the **Plaistow and Ifold Parish Neighbourhood Plan** in relation to comments made under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended by The Neighbourhood Planning (General) (Amendment) Regulations 2015).

Signed:

A handwritten signature in black ink, appearing to read "Andrew Hunt". The signature is written in a cursive style with a horizontal line under the name.

**Head of Planning Services**

Date: 18 October 2017