Wisborough Green Neighbourhood Plan Regulation 16 Consultation Responses

Summary of representations received by Chichester District Council (CDC) as part of Regulation 16 publication and submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Parish Name: Wisborough Green Parish Council Consultation Date: 30 April 2015 to 11 June 2015

Please note: CDC comments are submitted as a separate document (reference 037)

All the original representation documents are included, in full, as part of the examination pack. The table below may be a summary of the representations received so may not always be a verbatim report.

Name and Reference	Date received	Method of submission	Summary of representation
Reference Abigail Gadd (001)	12.06.15	submission Email	Opposition to the current Neighbourhood Plan for Wisborough Green. I object to the inclusion of the Winterfold site in the Neighbourhood plan – specifically to the recommendation to build over 20 new homes in the paddock of Winterfold, behind the Cricketers pub. The only time Winterfold was considered by the community as part of a choice with other sites back in 2006, it came second to last. There are other alternative sustainable sites deemed preferable by the community. I have number of objections which relate to specifically to the Winterfold site. 1. One of the main problems with this site is access. Access to the development would be via Durbans Road, which we villagers already acknowledge to be a spot with considerable dangers. The route along Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. Speed is already a concern on this road with traffic accelerating from the bend adjacent Swephurst Farm towards the site. The traffic and speed issue was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP and I would like to know why the opportunity not been taken to require this of
			1. One of the main problems with this site is access. Access to the development would be via Durbans Road, which we villagers already acknowledge to be a spot with considerable dangers. The route along Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. Speed is already a concern on this road with traffic accelerating from the bend adjacent Swephurst Farm towards the site. The traffic and speed issue was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within

- 2. Winterfold is a greenfield site. Throughout the consultation process the village has consistently favoured brownfield sites. Only one was selected originally (Clark's Yard) so why has the community's view and preference not been taken into consideration? We had assumed that it was because the plan had to comply with national and local policy however the council's own solicitor has advised when considering an objection to the Loxwood NP that the NP should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clark's Yard and the one forced on them by the successful appeal for the ten mobile homes. There has been no transparency in the way the public's expressed views have been discounted.
- 3. Worryingly, there is no buffer between the Winterfold site and the village conservation area. This is in contradiction of the direct planning policy of the council.
- 4. Given the proximity to the village conservation area, I am also concerned about the visual impact of the site. Having up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
- 5. One of my main concerns regarding this site is its proximity to the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow an additional access to the site. This would take away much needed play area for the children, where there is already not enough room for the children to run and play. Last winter the children were banned from running in the playground due to lack of space and overcrowding.
- 6. The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development.

We don't need a bio-diversity area. We have the countryside! The NP also says some of the land could be used for sport facilities but what would actually fit on this site? The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?

- 7. A related concern is what is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
- 8. The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens. Is the site deliverable?

The village has alternatives to the Winterfold site:

Specifically, given the fact that Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, why are the villages' most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan? Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community can now be accommodated given the inspector's opinion. The fact that Greenways was included at the last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may well have further reinforced the low appeal of Winterfold.

The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites should be re-examined either by further consultation or public hearings. There needs to be far more transparency about why decisions have been made because in some instances this is totally absent.

I also have a more general comment about the Neighbourhood plan, which I'd like to

			express here.
			Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents. There is no transparency as to why the decision was made to exclude the expressed need for retirement and sheltered homes within the plan – who and how was this choice made?
			I feel that the impact of the recent inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites ought to be re-examined either by further consultation or public hearings. There needs to be far more transparency about why decisions have been made because in some instances this is totally absent. More specifically, I would like to know why villagers' concerns for retirement homes and sheltered accommodation has not been reflected in the NP. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. There is no transparency as to why the decision was made to exclude the expressed need for retirement and sheltered homes within the plan – who and how was this choice made?
Alan Todd (002)	12.06.15	Email	I absolutely oppose development as proposed Winterfold on Durbans Road. It would have an adverse affect on the busy crossroads by the Cricketers Arms and I understand may provoke further planning gain by infilling once developed Not only that I have not been made aware of the Neighbourhood Plan until now despite the public consultation
Alison Mellor (003)	11.06.15	Email	Proposed site:- Winterfold (SS4) Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it – why was the community's

			view and preference not taken into consideration?
			We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a more suitable development at this location.
			The only time Winterfold was included in consultations was in 2006 when it came 10 th out of 11 possible sites.
			That Chichester listens to the views of the villagers and use existing Brownfield sites over Greenfield sites.
Angus Von Schoenberg	11.06.15	Email	I would like to object to the development of the Winterfold site for the following reasons:
(004)			1. The only time Winterfold was considered by the community as part of a choice with other sites (2006) it came second to last. Therefore, including it in the draft plan without taking account of this undermines the entire consultation process especially as there are other alternative sustainable sites preferred by the community available. Including it in the final draft with no options from which to choose does not encourage proper response or allow it to be judged against the merits of other sites. 2. Part of the site is opposite the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow additional access to the site. This would take away a much needed play area for the children, where there is already not enough room for the children to run and play. (Last winter the children were banned from running in the playground due to lack of space and overcrowding) 3. Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers Public House and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent to Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006, but has not been taken into

- consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP why has the opportunity not been taken to require this of the developer?
- 4. Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the nearby Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location. There has been no transparency in the way the publics expressed views have been discounted.
- 5. Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, so why are the most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion. The fact that Greenways was included at the last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may well have further reinforced the low appeal of Winterfold.
- 6. There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.
- 7. The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
- 8. The NP also says it's close to the village centre, it would be but for the fact that the

entrance is located some way down Durbans Road which is in fact almost 500m from the village shop.

- 9. The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development. We don't need a biodiversity area. We have the countryside! Looking at the parish council's recent minutes it would appear that the school has suggested they would rarely use this facility. The NP also says some of the land could be used for sport facilities but what would actually fit on this site. The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?
- 10. The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens. Is the site deliverable?
- 11.Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents. There is no transparency as to why the decision was made to exclude the expressed need for retirement and sheltered homes within the plan who and how was this choice made?
- 12. What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
- 13. The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites should be re-examined either by further consultation or

			public hearings. There needs to be far more transparency about why decisions have
	44.00.45	<u> </u>	been made because in some instances this is totally absent.
Anton Jerges (005)	11.06.15	Email	I strongly oppose many of the principles of the Neighbourhood plan and specifically the inclusion of the Winterfold site. I have highlighted below a number of items that I think need to be fully considered when considering this plan.
			•The only time Winterfold was considered by the community as part of a choice with other sites (2006) it came second to last. Including it in the draft plan without taking account of this goes against the whole process and the community was presented with no alternative choice when the draft plan was assessed.
			 Part of the site is opposite the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow an additional access to the site. This would take away much needed play area for the children, where there is already not enough room for the children to run and play. Last winter the children were banned from running in the playground due to lack of space and overcrowding.
			 Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub.
			The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP why has the opportunity not been taken to require this of the developer? The site also aims to expand the pedestrian access on Newpound Lane. It is not possible to do this as the lan is single track (as noted in the NP documentation). Additionally the NP documentation note that speeding traffic is an issue on Newpound Lane. How will development address this issue – particularly given the increase in traffic and the proximity to the school and the obvious danger therein?
			Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and

another greenfield site was dropped (Glebe Field) to accommodate it – why was the community's view and preference not taken into consideration? We were told because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location.

- Kirdford Road sites are now deemed as sustainable by the granting of permission by a planning inspector for these static homes, so why are the most popular sites of Carters field, Greenways and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion.
- There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.
- The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
- The NP also says it's close to the village centre, it would be but for the fact that the entrance is located some way down Durbans Road which is in fact over 500m from the village shop.
- The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development. We don't need a biodiversity area. We have the countryside! Looking at the parish council's recent minutes it would appear that the school has suggested they would rarely use this facility. The NP also

			says some of the land could be used for sport facilities but what would actually fit on this site. The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?
			• The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens.
			• Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents.
			What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
			• The Winterfold site must be exposed to the same public scrutiny as the other sites and the exclusion of preferred brownfield sites should be re-examined either by vote or public hearings.
D Evison obo Chichester Diocese	12.06.15	Email	My client is the owner of the land referred to as Glebe Field (site reference WG16) which comprises circa 5.5 hectares of land on the eastern fringe of the existing settlement.
Wisborough Green (006)			The site was previously promoted for development by the Diocese as part of the neighbourhood plan process. Indeed, in the Pre-Submission version of the Wisborough Green Neighbourhood Plan (January 2015) the site was identified as an allocated

development site under emerging policy SS3, albeit for just three dwellings. It is understood that the low unit numbers envisaged by the Pre Submission draft was due to concern over the impact of development on the Grade II listed St Peter and Vincula church. In response to this, the Diocese submitted representations to the Pre Submission draft (dated 16 February 2015) which included independent advice and evidence from CgMS Consulting (dated 11 February 2015). This advice concluded that the land referred to as Glebe Field could easily accommodate development at 20 dwellings per hectare (circa 30 dwellings) without detrimental impact to the listed building.

It is noted that the Submission version of the Wisborough Green Neighbourhood Plan now omits Glebe Field as an allocated development site. Under the Site Assessment and Allocation section on pages 63-65 of the Submission version of the neighbourhood plan, it states that 'all the sites were considered against the spatial strategy which sought to allocate the most sustainably located sites

that reduced the need to travel by car, and related well to the existing built development in the village'.

Contrary to the view of the Site Assessment, the site is well related to existing built development as the site sits on the eastern fringe of the existing settlement and has development directly adjoining the site to the south. The Site Assessment states that:

- Access to the site is provided directly onto the A272 available through Glebe Way
- · Visibility for access is good
- · Access is safe
- The site is within the 5 minute walking isochrones for village facilities
- There is safe pavement access available to the village centre.

Further, paragraph 5 of the Site Assessment and Allocation section states that 'the sites were reviewed in a sustainability matrix, which compared impacts of each development site and considered sites in groups where one site could mitigate the potential harm of another site' Having reviewed the site assessment for Glebe Field, which reviews the site against the said sustainability criteria, there

are no specific criteria where the site fails in terms of its sustainability or deliverability.

Moreover, the site is no less sustainable or deliverable than other sites that have now been

taken forward as allocations within the Submission version of the plan.

The site was considered as suitable for development within Chichester District Council's Strategic Housing Land Availability Assessment (May 2014). This identified that the site is available and has the potential to be developed (referred to as WG08161 Land East of St Peter's Church). This demonstrates that through separate assessments, through both the Local Plan and Neighbourhood Plan process, the site has been found to be suitable for development and deliverable.

Chichester District Council's Local Plan has recently been found sound by the appointed planning Inspector (May 2015). This confirms an objectively assessed need for 505 dwellings per annum over the plan period within the District (outside of the South Downs National Park). The modifications to the Chichester Local Plan states that further strategic and parish housing sites will be allocated in the subsequent Site Allocations Development Plan Document (DPD) and neighbourhood plans. Strategic sites identified account for 3,550 dwellings of the identified housing requirements, which includes land West of Chichester, Tangmere, Shopwyke and Westhampnett/ North East Chichester (58%). A total of 775 dwellings are identified within the Parishes. The evidence base for this is the SHLAA. Therefore, the omission of this site potentially undermines the Local Plan evidence base in relation to the identified site requirements within the parishes, notably as Wisborough Green is the dominant settlement within the rural north east of the District.

It is noted that paragraph 12 of the Site Assessment and Allocation section states that the now identified sites will deliver the required amount of housing over the plan period. However, this in itself does not present an appropriate justification for dismissing a sustainable and deliverable site in favour of other sites that are no more sustainable or deliverable.

The NPPF states that to be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

Through these and previous representations made to the neighbourhood plan we have demonstrated that the site is available and, subject to formal planning approval, a viable

			housing development could be achieved within five years. Independent assessments of the site through both the local and neighbourhood planning process have also demonstrated that the site is a suitable location for development. In summary, we consider the land known as Glebe Field to be a sustainable and deliverable site. Given housing needs in the District, this site offers the opportunity to deliver new homes on a site well related to the existing settlement with good access to local services, public transport and the local road network. We are aware that there have previously been concerns over the impact to the Grade I listed church. However, sufficient evidence has been provided through previous representations to demonstrate that, through sensitive design and layout, a viable housing scheme is achievable on this site without detrimental impacts to the listed building or to its setting. In its present form, we consider that the Wisborough Green Neighbourhood Plan has not been positively prepared nor is it justified on the basis that it has omitted a deliverable site that has the potential to deliver a number of new homes in a sustainable location. We therefore request that the Plan is amended to include Glebe Field as an allocated site suitable for housing. We would welcome further discussion of our representations with the Parish Council. In the interim, I hope the foregoing is of assistance in the progression of the Neighbourhood Plan.
McClaren Clark Group (007)	11.06.15	Email	We recognise the hard work and time that has been spent formulating the submission plan and we would like to support the plan moving forward. However, we do currently have one concern for which we would like to suggest a modification. In order to meet local housing need, the Neighbourhood Plan identifies a number of sites to be suitable for housing development within the plan period. Whilst we welcome the inclusion of Policy SS4, land at Winterfold, Durbans Road, we also note that all sites identified for housing development are restricted to specific time frames and phasing periods. Whilst we specifically reference policy SS4, Land at Winterfold, Durbans Road, we note that all sites are given phasing timeframes and we are of the opinion that these should be removed for the following three reasons. Unfortunately, we are not able to locate any substantial evidence that suggests how these

timeframes have arisen or why each site was put into each phasing category. For example, land at Winterfold, Durbans Road, is considered for inclusion within the period 2025-2029, yet the site is sustainable, available now and the landowner is able to submit a planning application within the next 5 years.

The National Planning Policy Framework (NPPF) requires sustainable development to be approved without delay. The NPPF also requires planning authorities to deliver a five year supply of housing land. Whilst Chichester District Council are moving towards the adoption of a new Local Plan, new targets are not in line with the districts objectively assessed needs and the examiner has therefore requested that, should the plan be adopted, a review take place within the next 5 years. Introducing phasing periods and therefore restricting the development of sustainable sites means suitable sites are not able to contribute towards this need. This therefore means that sustainable development cannot be bought forward without delay and the neighbourhood plan is not in accordance with the key policies of the NPPF.

We would also like to make specific reference to the Newick Neighbourhood Plan Examiners Report. Newick Neighbourhood Plan was similar to this submission plan in that it sought to introduce specific timeframes for development. The Examiner concluded in his report that this approach failed to have regard to the NPPF as it did not allow for sustainable development to be approved without delay. The Examiner also determined that introducing timeslots would severely limit the ability of the plan to be flexible. The NPPF requires affordable housing policies to be flexible in order to take account of market conditions over time. Introducing policies that do not conform with the NPPF do not meet the basic conditions. The Examiner therefore recommended that the phasing slots be removed in order to ensure the delivery of a wide choice of high quality homes in line with the NPPF. These recommendations were taken on board within the Referendum Version. Page 72 specifically states that the site was identified as suitable due to its proximity to the village centre and the ability to develop the site with minimal visual effects. There is pedestrian access to village facilities and the school, it is close to the village centre and it could seek to offer additional green and recreational space for use by the community. The site is sustainable in economic, social and environmental terms and should therefore be bought forward without delay in like with the NPPF and district requirements as opposed to being restricted due to phasing requirements.

We would suggest removing the phasing periods to allow sustainable, deliverable sites to be

			developed without delay to meet the district objectively assessed needs. This would help to ensure that the Neighbourhood Plan meets the basic conditions and conforms with the overarching policies outlined within the National Planning Policy Framework.
Environment Agency (008)	15.06.15	Email	We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.
			We are pleased to see that throughout the Neighbourhood Plan there is recognition of the importance of climate change and the natural environment
			We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that any future development is directed to Flood Zone 1.
			We support the intention of Policy IN1 with regard to Surface Water Management however we would recommend that some consideration is given as to how the policy would be implemented, for example who would be asked to appraise any Surface Water Management Plan that accompanies a planning application.
			We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account when looking to fund local infrastructure.
Greg Stevenson	11.06.15	Email	Comments made in regard to site at Winterfold:
(009)			We do not oppose the need for additional housing within the village. However, we do question the need to develop this greenfield site in preference to the other two 'brownfield' sites.
			Of <i>particular</i> concern is access to the development, whether that be to Durbans Road or to Newpound Lane.
			Our property is a couple of doors away from the Cricketers Arms public house, and (particularly in Summer), but certainly every weekend, Durbans Road is effectively a single track road, with cars parked far past Winterfold. Although we have our own driveway, we often find it more or less impossible to gain access to / leave it when the pub is open, due to vehicles being parked opposite. Additionally, there are fair number of 'stand-offs' between

			drivers who refuse to give way and/or reluctant to back up 150 metres.
			There have been a number of accidents at the crossroads within the village, culminating in the tragic accident 3 years ago where a teenager lost their life and others suffered life changing injuries.
			The speed of traffic using Durbans Road as a cut through to the B2133 is often substantially above the 30mph limit, and in quite a lot of cases, excessively so. We do feel that an additional access/exit point within an already congested road, will only – eventually – result in another tragic episode.
			The situation in Newpound Lane is equally acute given its proximity to the Junior School, as it is a single track road and is by definition, a high risk zone for exuberant youngsters, who are not always the easiest to control, who through no fault of their own, find themselves at risk. It cannot be correct that any additional access would be granted in this location.
			I would prefer to see development where a) it is an existing Brownfield site as this is in any case preferred Government policy, and will those existing sites be allowed to deteriorate further? b) access to/from the site is safe: I cannot see under the existing proposal that either of these are satisfied.
Mr and Mrs H R	12.06.15	Email	Policy DS3
Laing (010)			"All house extensions requiring planning permission should follow the style and vernacular of the original building"
			We wholeheartedly challenge this policy.
			The adaptation of a house over time is a natural part of its history, and Wisborough Green is very historical village which must allow its homes to change over time to enable it to maintain the essence of its community.
			Good new design that is honest to it own period can work well alongside an old building and ensures that the new ages are clearly distinguishable. This approach can also make for exciting internal living spaces which suit today's lifestyle and add something of value that future generations will enjoy. Furthermore, modern building regulations mean it is unlikely

Highways England (011)	9.06.15	Email	one would be able to build an extension using exactly the same methods as those employed in the construction of the original house if it is of a certain age. Good new design that is honest to its own period can work well alongside a new building and ensures that the two ages are clearly distinguishable. The Georgians never tried to replicate the Tudor style when adding to an older house; as a result, we have inherited "layered" buildings which are fascinating to explore and beautiful to the eye. Most seriously, replicating the original architectural design can result in a clumsy pastiche. In contrast, for example, an ultra-modern glass extension juxtaposed against an old house can often be acceptable to Conservation Officers since the integrity of the original house is preserved because you can still see the old building through the glass. SPAB and English Heritage guidance is supportive of appropriate modern extensions that contrast with the traditional vernacular of an older building, uphold the originality of the building, sensitively tell the story of the building and allow the residents to live a lifestyle appropriate to current times Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and
Historic England (012)	29.05.15	Email	needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network. We have reviewed the above consultation and do not have any comments. Para 2 - Historic England remains disappointed that the historic environment of Wisborough Green is not recognised as one of its "special qualities" in the same way as its high quality natural environment is, despite "rich historical heritage" being one of the identified strengths of the village. The addition of a new bullet point under paragraph 2: "A rich historical heritage with numerous listed buildings, a scheduled ancient monument and a conservation area".

Vision Statement - Historic England welcomes and supports the reference to the historical environment of the parish in the Vision Statement.

Vision and Objectives - Historic England welcomes and supports Objective 3 for its reference to respecting existing listed and other historic buildings and features and Objective 9 relating to the conservation and enhancement of the historic environment. We are grateful to the Parish Council for making these additions.

Location - Historic England welcomes the reference to the "historic and Conservation Area" of the village in 2. Under "Location".

History and Heritage - Historic England welcomes the section on History and Heritage and is grateful to the Parish Council for the addition of information on the archaeological significance of the Parish and references to the Chichester Historic Environment Record and West Sussex Historic Landscape Characterisation. We now feel that this section is a comprehensive and interesting description of the rich historic heritage of the Parish, although we have previously suggested that it might be helpful to say a little about the current state of the historic environment in the parish.

The addition of a reference to the condition of the heritage assets in the parish, including the Conservation Area.

Housing Background - Historic England welcomes the references to the Conservation Area and Conservation Area Character Appraisal in 2 under "Housing Background".

Strengths - Historic England welcomes the identification of "rich historical heritage" as one of the strengths of the Parish.

OA2 - Historic England welcomes and supports criterion d of Policy OA2 requiring development not to impact adversely on the Conservation Area.

OA4 - Historic England welcomes and supports criterion b in Policy OA4 that windfall sites schemes will not adversely affect any heritage assets.

			EN4 - Historic England welcomes and supports Policy E4, which we consider to be an excellent example of a neighbourhood plan historic environment policy, and the intent of this Policy as set out in the supporting text.
			DS2 - Historic England welcomes and supports Policy DS2 and its supporting text for their references to locally distinctive character and requirement that any new development adjacent to a listed building or buildings of historic interest should be sensitively designed to conserve and enhance the setting, form and character of the building.
			DS3 - Historic England welcomes and supports the reference to listed buildings or buildings of historic interest in Policy DS3.
			SS1 - According to our records there are no designated heritage assets on this site but it is adjacent to the Conservation Area. Historic England therefore welcomes and supports the requirements for the design and style of new dwellings to take into account the proximity to the Conservation Area and for an archaeological investigation to be carried out in advance of any building works. The results of this investigation should influence the form of the development.
			SS3 - According to our records there are no designated heritage assets on this site but it is close to the Conservation Area. We therefore welcome the requirements for the design and style of new dwellings to take into account the proximity to the Conservation Area.
			SS4 - According to our records there are no designated heritage assets on this site but it is partially adjacent to the Conservation Area. We therefore welcome the requirement for the design and style of new dwellings to take into account the proximity to the Conservation Area.
			Community Action Plan - Historic England welcomes the aspiration to review and monitor CDC Conservation Area Management Plan.
			We would also welcome an additional aspiration to assess the condition of grade II listed buildings in the Parish.
Jeremy Stone (013)	11.06.15	Email	I have comments re the proposed development at Winterfold and its position and relevance to the Wisborough Green Neighbourhood Plan.

The only time Winterfold was considered by the community as part of a choice with other sites (2006) it came second to last. Including it in the draft plan without taking account of this undermines the entire consultation process especially as there are other alternative sustainable sites preferred by the community available. Including it in the final draft with no options from which to choose does not encourage proper response or allow it to be judged against the merits of other sites.

Part of the site is opposite the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow an additional access to the site. This would take away much needed play area for the children, where there is already not enough room for the children to run and play. Last winter the children were banned from running in the playground due to lack of space and overcrowding.

Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP – why has the opportunity not been taken to require this of the developer?

Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it – why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class

of development at this location. There has been no transparency in the way the publics expressed views have been discounted.

Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, so why are the most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion. The fact that Greenways was included at the last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may well have further reinforced the low appeal of Winterfold.

There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.

The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.

The NP also says it's close to the village centre, it would be but for the fact that the entrance is located some way down Durbans Road which is in fact almost 500m from the village shop.

The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development. We don't need a bio-diversity area. We have the countryside! Looking at the parish council's recent minutes it would appear that the school has suggested they would rarely use this facility. The NP also says some of the land could be used for sport facilities but what would actually fit on this site. The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?

			The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens. Is the site deliverable? Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents. There is no transparency as to why
			the decision was made to exclude the expressed need for retirement and sheltered homes within the plan – who and how was this choice made? What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
			The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites should be re-examined either by further consultation or public hearings. There needs to be far more transparency about why decisions have been made because in some instances this is totally absent.
Jon Finn (014)	11.06.15	Email	•The only time Winterfold was considered by the community as part of a choice with other sites (2006) it came second to last. Including it in the draft plan without taking account of this undermines the entire consultation process especially as there are other alternative sustainable sites preferred by the community available. Including it in the final draft with no options from which to choose does not encourage proper response or allow it to be judged against the merits of other sites.

- Part of the site is opposite the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow an additional access to the site. This would take away much needed play area for the children, where there is already not enough room for the children to run and play. Last winter the children were banned from running in the playground due to lack of space and overcrowding.
- Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP why has the opportunity not been taken to require this of the developer?
- Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clark's Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clark's Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location. There has been no transparency in the way the publics expressed views have been discounted.
- Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, so why are the most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion. The fact that Greenways was included at the

last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may well have further reinforced the low appeal of Winterfold.

- There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.
- The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
- The NP also says it's close to the village centre, it would be but for the fact that the entrance is located some way down Durbans Road which is in fact almost 500m from the village shop.
- The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development. We don't need a biodiversity area. We have the countryside! Looking at the parish council's recent minutes it would appear that the school has suggested they would rarely use this facility. The NP also says some of the land could be used for sport facilities but what would actually fit on this site. The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?
- The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens. Is the site deliverable?
- Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included

			within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents. There is no transparency as to why the decision was made to exclude the expressed need for retirement and sheltered homes within the plan – who and how was this choice made? • What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future. • The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred
			brownfield sites should be re-examined either by further consultation or public hearings. There needs to be far more transparency about why decisions have been made because in some instances this is totally absent.
Laura Willock (015)	11.06.15	Email	I oppose development on Winterfold paddock for the following reasons: • Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. In addition, increasing volume of traffic near the Cricketers and the junction opposite the pub (Durbans Road, Kirdford Road and Newpound Lane) would make this junction even more dangerous. It is already very difficult for the school children (including my own 2 children) to cross Durbans Road on their way to and from school safely. • Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan.

			There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.
			• The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The Neighbourhood Plan says it will have "minimal visual impact". This is not true. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
			The Neighbourhood Plan says it's close to the village centre but the entrance is located some way down Durbans Road which is in fact over 500m from the village shop.
			• What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
			• The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites should be re-examined either by further consultation or public hearings.
			Other sites to be considered. There are better options than Winterfold paddock which will not increase traffic flow in the middle of the village nor have such a huge visual impact.
Lucy Von Schoenberg (016)	11.06.15	Email	I am firmly opposed to the inclusion of one of the sites Winterfold in the village neighbourhood plan. This site was not included in any consultations since 2006 and when it was considered by the community as part of a choice with other sites (2006) it came second to last. Including it now in the final draft with no other options from which to choose clearly undermines the entire consultation process as it does not allow it to be judged against the merits of the other sites, especially as there are other alternative sustainable sites preferred by the community available.
			• Part of the site is opposite the village school. Apparently the developer asked the school to move its current car park in the front of the school to the rear, presumably to allow an additional access to the site. This would take away much needed play area for the children, where there is already not enough room for the children to run and play. Last winter the

children were banned from running in the playground due to lack of space and overcrowding.

- Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP why has the opportunity not been taken to require this of the developer?
- Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location. There has been no transparency in the way the publics expressed views have been discounted.
- Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, so why are the most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion. The fact that Greenways was included at the last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may well have further reinforced the low appeal of Winterfold.

- There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council.
- The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.
- The NP also says it's close to the village centre, it would be but for the fact that the entrance is located some way down Durbans Road which is in fact almost 500m from the village shop.
- The scheme from the developer offers a 'biodiversity area'. This includes a man made pond. The developer is clearly forgetting that this is a countryside location and there are already 3 natural ponds all within walking distance of the development. We don't need a biodiversity area. We have the countryside! Looking at the parish council's recent minutes it would appear that the school has suggested they would rarely use this facility. The NP also says some of the land could be used for sport facilities but what would actually fit on this site. The developer appears to be offering nothing to the village that is needed or usable. In addition, how can the use of part of the site for recreation be legally secured as such in perpetuity as stated in the NP? Surely there is nothing that can stop this being developed in the next 5 year housing supply?
- The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to provide this without encroaching on the road or into the hedge and private gardens. Is the site deliverable?
- Throughout the consultation process 30-39% of the villagers asked for retirement homes and upwards of 20% specifically sheltered accommodation. This has not been included within the plan despite the fact that this type of housing would have the least effect on the village infrastructure, most notably the school which is already full and would free up bigger houses which in turn would free up smaller family houses. The NP hardly mentions older people and the words retirement and sheltered are not mentioned. No choice is being

			provided for people who want to stay in their village as they grow old. Providing 'lifetime homes' mixed into other sites does not work if there is no form of support available at the same time so we will be driving out our older residents. There is no transparency as to why the decision was made to exclude the expressed need for retirement and sheltered homes within the plan – who and how was this choice made?
			• What is to prevent the developer gaining planning consent on the garden of Winterfold once the settlement boundary has been moved to include it? This could provide more than 10 more houses clustering development in this one area. There is also no natural boundary to prevent this development sprawling further into the greenfield in the future.
			• The Winterfold site must be exposed to the same public scrutiny as the other sites, the impact of the inclusion of Greenways on the whole plan and the exclusion of preferred brownfield sites should be re-examined either by further consultation or public hearings. There needs to be far more transparency about why decisions have been made because in some instances this is totally absent.
Matthew Dronsfield (017)	11.06.15	Email	I am submitting my comments to oppose the conclusions expressed in the Wisborough Green Neighbourhood Plan being put before Chichester Council. Specifically I am opposing the inclusion of the development of Winterfold, Durbans Road. My reasons for opposing this development are: • This site has never been consulted on by the Parish Council during its public consultation exercise. • I believe the parish council has ignored much of the what the residents of Wisborough Green fed back during the consultation meetings. • The proposed development of Winterfold would have a detrimental impact on the village school and surrounding area. • There is no justification for the development of a designated greenfield site when alternative brown field sites are available. • The development does not take account of the acknowledged need to provide additional housing for elderly residents. • The inclusion of Winterfold should be subject to the same public scrutiny as the other sites that have been considered and the exclusion of preferred other brown field sites should be re-examined.
	1	1	There has been a lack of transparency about why decisions have been made.

			The inclusion of Winterfold should be fully examined by public consultation. The plan should be rejected on the basis it does not meet the needs of the village in respect of sheltered and retirement housing. Full consideration should be given to the inclusion of existing brown field sites as opposed to the development of green field sites
Michael Gadd (018)	11.06.15	Email	Policies OA1 & OA2 The principle is acceptable, but the selected location of local gaps is inconsistent. The selected location on Durban's Road positions the gap at the North end of the green space to either side of the road. One would have thought that even allowing for development at Winterfold the gap should encompass the whole green space or at least start at the southern end of it. Surely this will allow for further development of this highly visible green space. The local gap on Kirdford Road encompasses built up land on the southern side which is at odds with this being a gap and seems contrived. I would suggest this gap needs to be further along Kirdford Rd at Wisborough Villas especially in light of the inspector's decision to allow development at Greenways. The planning inspector's comments on the allowed appeal WR/13/00744/FUL state that development in that location would not lead to new isolated homes in the countryside. EN2 The view across Brooklands Barn is not consistent with the view specified in the Conservation Area plan. I question the quality of the view which is spoilt by a large row of very tall non indigenous conifers and several electricity pylons. It has few natural landscape merits and should not be included. SS2 Redevelopment of this as residential use is a sensible option, although one wonders whether a mixed use scheme incorporating some B1 use would be a benefit to the economy

of the village. I recognise that the existing employment can be retained elsewhere but this will be outside of the parish. There are also a number of local small businesses that rent office accommodation in neighbouring centres so I believe there would be strong demand and which would add to the overall sustainability of the village.

Despite its suitability on many grounds and I agree it should be redeveloped, I question whether it's deliverable. Its access suffers from poor visibility to the east along the A272 and is only just inside the 30mph. As I live opposite to the east, I can testify that traffic speeds are very rarely 30mph at this point and more generally in the band of 40-50mph. Visibility splays in excess of 120m will no doubt be required and these cannot be achieved unless the existing trees, hedgerows and raised ground (>600mm) are removed. Much of the land is of unknown ownership which would prevent this. More importantly, loss of this vegetation would have significant urbanising effect at the entrance to the village and be contrary to other policy. One option could be to move the 30mph sign further east and introduce low impact (in terms of noise) traffic calming. But there is obviously a high cost attached to this which could make any scheme financial unviable and there is no guarantee that either can be delivered.

The site does have footpath connectivity to the village but this is <1m wide for almost its entire length. It is also well outside of the 5 minute walk criteria and I'd suggest it would be closer to 8-10 minutes from the top of the access road into the proposed site. The distance to the centre of the Green (the point specified in the NP) from the top of the indicative access road is some 700m and from the same point to the village shop it is 670m. It is also beyond the local gap which is intended to constrain the village expansion.

SS4

I strongly object to this policy. For the following reasons:

- It is Greenfield adjacent the conservation area, outside of and not bordering the SPA and within close proximity to two listed building. Furthermore, new houses will sit in front of the Grade I listed church on the approach along Durbans Road.
- From examination of the minutes for the parish council meeting dated June it is
 evident that the landowner, who has submitted a pre-app for 50% more houses than
 stated in the NP, is looking to ignore the number of houses allocated in the NP and

the phasing of them being delivered. It seems from the minutes that the parish council and CDC is accepting some level of defeat with regards to the quantum of houses and I assume this is because once the SPA is adjusted to include this site a higher density will be hard to resist. If this is the case then it undermines any basis on which the site has been assessed to date and a further consultation exercise should be convened that provides this significant new information to the community so the site can be fairly assessed.

- The site was included in the draft plan but was not included in the consultations on which the draft plan was based. It was included in the housing survey of 2006 which recorded the largest public response and in that survey it performed very poorly and came 10th out of 11 sites considered. The consultation process is undermined by this and the site appears to have leapfrogged more popular sites based on a subjective assessment of its performance which is inaccurate and not transparent.
- Having examined the traffic light assessment for this site and compared it to others it
 appears to have received a far more positive commentary for some reason. There is
 no transparency as to how the objectivity of this assessment was assured and it
 seems entirely subjective.
- The NP and draft NP state that it would have minimal visual impact. This cannot be
 the case viewed on the approach to the village from either Durbans Road or
 Newpound Lane where the site and up to 30 new houses will be highly visible. This
 further undermines the consultation process as that is part of the basis on which it
 was assessed at stage 14.
- It has been included over other greenfield and brownfield sites which were preferred by the community in 2006 which was the only time it was put forward against alternative options (this wasn't the case at Stage 14 as no alternatives were offered). Throughout the consultation the community expressed a preference for the sites along Kirdford Road and Newpound. The inspector's decision on the Greenways nursery on Kirdford Road established that these sites were sustainable so this cannot be used as an argument to dismiss them from selection. Indeed, the Carters Field site is only 40m further from the shop than this site and offered a footpath connection which would have provided for all sites existing and proposed along Kirdford Road. It would have also have enhanced the sustainability of these sites
- Durbans Road suffers from high speed traffic at this point and narrow unsafe pavements. In the assessment of the site this was understated and yet elsewhere in the NP traffic calming is suggested. The plan should include a requirement for the

- developer to provide this.
- The footpath from the site along Durbans Road is no more than 1m wide and there is no way to widen it without taking land from private gardens which cannot be delivered putting the deliverability of this site in question.
- Once the SPA is adjusted to include this site there will be little to prevent an
 application for 10-15 houses on the garden of Winterfold being permitted as it will fall
 within the SPA. This will include knocking down the existing house at Winterfold the
 principle of which has now be accepted by the appeal decision on WR/13/01722.
 Given the land owners demonstrated intent on the site allocated n the NP there is a
 strong argument to suggest that such an application will be brought.

General Objections

The NP does not take adequate account of housing for the older people. The NP acknowledges that the village has a high proportion of retired people and the consultation processes all the way back to 2006 indicated between 30-39% support for retirement housing. When asked, 20% and above specifically refer to sheltered housing. AgeUK use the terms retirement and sheltered housing inter-changeably. Despite this none has been provided for within the NP and the document doesn't mention either. It suggests that mixed demographic developments with a proportion of lifetime homes provides what's needed. It's unfortunate that for some reason this assessment has been made and I can see no argument within the consultation assessments to explain the reasoning. Indeed, to the contrary, the evidence review specifically (page 10) the specialist housing would be required. There is a serious issue of transparency as to why this has been ignored. If there was uncertainty about what respondents understood retirement housing to be in the consultations then this should have been further clarified in later consultations but this was not done. A significant number of residents have asked for this and it's established within the NP consultations that many are looking to leave the village to find this type of accommodation which clearly undermines the intent of the plan to be for local people. Further consultation should be undertaken to establish whether the community feels the expressed needs of retirees has been met. This will then satisfy the requirement for transparency.

There is a questions of transparency as I believe that a number of my comments made at Stage 14 are not included in the consultation report or the data associated with it and yet

			some are.
			There is a question over transparency as to why the sites preferred by the community have not been included and have received adverse assessments. This is of particular concern when some selected sites have been promoted to the community through the draft NP and the submitted NP with false information. I have stated some of these above and a further one relates to Clarks Yard "It fits all the key criteria the community p u t f o r w a r d a n d t h e visualisations show a small development of mostly smaller units." As you'll see in my comments above it fails on several counts. I forgot to note down the reference but this inaccuracy runs back in to the site assessment where it was noted to be within the walking criteria. I realise the NP is not required to be as accurate as a LP but when preferred sites are being rejected there needs to be some level of accuracy.
			While road safety and new footpaths are mentioned in the NP there is no clear policy or execution plan that will deliver them. These have been expressed as key local concerns throughout the consultation process but have not been delivered in the plan. It's not sufficient to say they will be secured through 106 payments as the cost can be significantly above the amount requested they should be tied to specific developments in the area impacted by the development.
Natural England (019)	11.06.15	Email	§ We welcome Policy OA7 regarding development in the setting of the national park. The western edge of Wisborough Green is some 600m from the park; so I trust that appropriate dialogue with the Park Authority has resolved any potential for significant effect on the setting of the designated landscape
			§ We support Policy EN1 and the clause on protected species. Care is needed particularly on rural sites, where there are old or derelict structures, or which include (or are close to) features such as ponds, ditches and field boundaries; where protected species may be present. Their protection should be one of the central considerations at the detailed planning stage. For example, a number of the NP allocations include or are close to ponds and watercourse which may accommodate species such as GCN (inter alia). In these sorts of cases early reference to biological records would clarify where there are issues, the need to undertake ecological surveys and the need for appropriate mitigation measures.
			§We welcome the intent (regarding waste water management):"to ensure that there is sufficient capacity for any new development and to eliminate the risk of sewage infiltrating

Office of Rail and Road (020)	07.05.15	Email	into the surface water systems and properties"; and also Policy IN2. Some reference to the adequacy of treatment to ensure that water of an appropriate quality is discharged into receiving waters, to ensure no harm to downstream habitats and biodiversity, would be helpful. §Development at Wisborough Green falls within the impact risk zone of The Mens SAC and SSSI (important inter alia for bats). Consideration needs to be given to the impact of development proposals outside or extending existing settlements, affecting greenspace, farmland, semi natural habitats or features such as trees, hedges, streams, rural buildings/structures - to ensure the protection of habitat, flight lines and forage areas use by the bats. Survey will reveal any need for retention of features and any mitigation required for the development. § Para 8 (on page 28) indicates that a Habitat Regulation Assessment "is not considered necessary as the proposals included in this Plan do not involve any building on sensitive habitat sites". In coming to this conclusion, consideration has also been given to the likelihood of significant effect on European sites arising indirectly from development. §I trust that the Green Infrastructure/Ecology Network Map mentioned in Policy EN1: Ecological Sites includes BAP habitats, since they are key to the delivery of the government's aim of halting the decline in biodiversity and in delivering the ambitions defined by Lawton and the NPPF. Due to the current pressure of consultations on land-use proposals, plans and appeals, I have not been able to spend the time I would have wished to review and comment on your Plan, and I recognise that some of the issues raised above may be covered by background papers and do not need to be fully reflected in the Plan. Nevertheless, I hope you find these comments helpful. Thank you for your e-mail of 30 Th April 2015 seeking any representations we may wish to make in relation to the publication of the Wisborough Green Neighbourhood Plan.
,			The Office of Rail and Road has no comment to make on this particular document.
Phoebe March (021)	19.06.15	Email	I am writing to protest about the 'New Homes' you are building in Wisborough Green. The birds, the worms, the rabbits, the badgers, the insects, all of them, the precious lives of

			those lovely animals. The trees, the views, the habitats, everything about the beautiful landscape is soon to be ruined.
			If you wanted I could make a list of all those precious, beautiful things close to our heart that will very soon be ruined and gone.
			Everyone says, 'Oh well young people need a nice country-filled place to live, with farms and fields'. Well that is what it is now, however it won't be when we have sixty or more houses are built in OUR village. Oh and what about the industry? Where are young people going to work? Why don't you just carry on building in Billingshurst and Broabridge-Heath and Horsham where there are so many more job opportunities, schools, shops and public facilities?
			Being environmentally friendly is one of the things we try hard to do here. Do you think more litter and more pollution is going to still be eco friendly?
			As you can probably tell no one, and I mean no one wants this change to the village. We don't wish to live in a massive town otherwise we'd move to one; we're absolutely perfect as we are, in a small pretty village.
			Please, take a look around the village; have you seen how many houses there are for sale? Lots. If people want to come and live here they are to live in those.
			I shall dig my heels so deep and I mean so deep into the Earth until you STOP. And this may not be soon, but I will put a stop to it, I promise, I will.
			So now just before you do start building all these houses, please have a big, big think about what you're actually doing and who you're doing it to.
Robert Willock	11.06.15	Email	I oppose development on Winterfold paddock for the following reasons:
(022)			 Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. In addition, increasing volume of traffic

			that the local people demonstrated a preference for development of Brownfield sites. Yet this plan proposes four potential sites three of which are classified as Greenfield. In addition there was a preference for development of a number of small sites rather than a few large sites. This plan only proposes four areas which presumably need to account for the circa 60 homes suggested by CDC hence 15+ each. I am also bemused by the political weight which is being attributed to the value of this process and yet the overt undermining of the whole principle of 'local neighbourhood planning' by the number of inappropriate large scale developments which have been approved by CDC while it is being developed (Meadowbank site, Kirdford Road static caravan site). Can we seek reassurance from CDC that those approvals are included in the quota – or are we expected to absorb circa 60 houses in addition to these? More use of Brownfield sites and protection of our green spaces. Thoughtful use of space and insertion of smaller developments in more frequent places rather than a small number of large developments. CDC having respect for the planning process and not approving any further developments until the NP is actually finished.
Sara Todd (024)	12.06.15	Email	Durbans Road is a narrow, quiet country lane. The access point to the development is several 100 metres along this quiet lane making a large stretch of Durbans Road busy with many more cars highly increasing risk of an accident or worse. The pavements are very narrow and very dangerous if walking with small children. The site will be extremely visible and not in keeping with this part of the village. There are already 3 natural ponds at this sight!! The boundary of the site is right next to a conservation area. There are many other proposed sites within the village where the infer structure is better lent for a development of this size, where roads are wider, pavements wider (or could be widened), more central and far less visible. I therefore strongly object to this development site.
SDNPA Rep (025)	05.06.15	Email	Thank you for consulting the South Downs National Park Authority (SDNPA) on the submission version of the Wisborough Green Neighbourhood Development Plan (WGNDP). The National

			Park Authority welcomes the publication of this plan, which is the result of a considerable amount of hard work by the parish council and the local community. The SDNPA provided comments during the pre-submission consultation and is pleased to see the WGNDP has been revised accordingly, in particular the SDNPA welcomes: -Policy OA6 Development in the Neighbourhood Area within the South Downs National Park which is considered to conform to national guidance set out in the 1995 Environmental Act on the statutory Purposes and Duty for National Parks. -Policy OA7 Land Adjoining the South Downs National Park which is considered to be in line with national guidance on the duty to have regard to the purposes of National Parks and National Planning Practice Guidance that National Park Management Plans may be a material consideration in planning applications. There appears to be a typo in Policy OA7 which is missing the word 'out' in the final sentence of the first paragraph. The SDNPA does not have any comments to raise in regards to the Basic Conditions tests for Neighbourhood Development Plans.
SGN (026)	04.06.15	Email	SGN have assessed the impact of your proposed future development areas or site allocations which includes; Land South Meadow, Petworth (25 dwellings), Land South of the Greenways Nursery (Stationing of Caravans -10), Clark's Yard, Billingshurst Road (11 dwellings) and Winterfold Fields, Durbans Road (22 dwellings) covering between 2015-2020. We can conclude that on the whole, SGN Gas infrastructure at the above locations would not be significantly impacted by the level of the identified plots for future development, as the nearest gas mains supply is in Billingshurst. While information obtained through these consultation or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network, arise from the Gas Act 1986 (as amended), an extract of which is given below:- Section 9 (1) and (2) which provides that: 9. General powers and duties

- (1) It shall be the duty of a gas transporter as respects each authorised area of his:-
- (a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and
- (b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him -
- (i.) to connect to that system, and convey gas by means of that system to, any premises; or
- (ii.) to connect to that system a pipe-line system operated by an authorised transporter.
- (1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.
- (2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -
- (a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

While information obtained through these consultation or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. We can surmise that this is a high level assessment and response, the information provided should be used as a guide in your proposed review.

We would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the Chichester District Council area and due to the nature of our licence holder obligations;

Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.

Should major alterations or diversions to such infrastructure be required to allow

			development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process. We would, therefore, request, that where the Council are in discussions with developers, via the Local Plan, that early notification requirements are highlighted. Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.
Southern Water (027)	08.06.15	Email	Policy SS4 - Policy SS4 allocates land to the rear of Winterfold for about 22 dwellings. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), we have undertaken assessments of the existing capacity of our infrastructure and its ability to meet the forecast demand for the proposed development. A connection to the local sewerage system at the nearest point of adequate capacity is the mechanism by which the development could provide the infrastructure necessary to serve it. So whilst we welcome the general recognition that sewerage infrastructure is given in the NDP, for the sake of clarity, we request specific provision in the site allocation policy.
			 This specific policy provision would facilitate the delivery of the requisite local infrastructure, in line with government policy and guidance, including: paragraph 17 of the NPPF requires plans to provide a practical framework for the determination of planning applications, paragraph 183 of the NPPF requires NDPs to set planning policies to determine decisions on planning applications, paragraph 41 of NPPG advises that 'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared' paragraph 45 of the NPPG directs that 'Infrastructure is needed to support

development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan to be delivered in a sustainable way....'

Strategic policies

Policy 9 of the latest version of the Chichester Local Plan states that 'Development and infrastructure provision will be coordinated to ensure that growth is supported by the timely provision of adequate infrastructure, facilities and services'. Our proposed policy provision would ensure that a sustainable development is achieved in general conformity with this strategic planning policy.

Importantly, our proposed policy provision would give early warning to the developers that additional local infrastructure would be required to serve the proposed dwellings, ensure that this a consideration during the determination of any planning application and ultimately ensure delivery of the requisite local infrastructure in parallel with the development by way of a planning condition.

For the sake of clarity and to ensure consistency with the strategic policies of Chichester District Council, the NPPF and NPPG, we propose the following additional wording to policy SS4 of the Wisborough Green NDP:

The development of the site must demonstrate that disposal of foul sewage does not exacerbate existing foul sewage disposal problems in the village, particularly at Moonsbrook. Accordingly, the development will need to provide a connection to the nearest point of adequate capacity in the sewerage network, in collaboration with the service provider.

New policy on the provision of infrastructure:

We can find no policies to support the delivery of new or improved infrastructure. New or improved water supply and wastewater infrastructure maybe required to serve new development identified in the Neighbourhood Development Plan (NDP) or meet stricter environmental standards. Without our proposed policy provision, the NDP does not meet the basic conditions necessary for a NDP as outlined below, namely to: have regard to

\ /			Planning Policy in the National Planning Policy Framework identifies how the planning
Sport England (028)	05.05.15	Email	Thank you for consulting Sport England on the above Neighbourhood Plan.
			New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.
			To meet the basic conditions of a NDP, we propose the following additional policy:
			Policy 9 of Chichester's emerging Local Plan states that 'The Council will work with partners neighbouring councils, infrastructure providers and stakeholders to ensure that new physical, economic, social, environmental and green infrastructure is provided to support the development identified in the Local Plan'. Similar policy provision is sought for the NDP, which likewise allocates housing sites.
			Strategic policies
			Southern Water is the statutory water and sewerage undertaker for Wisborough Green. Our proposed policy provision would be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. Also paragraph 157 of the NPPF requires positive planning for development and infrastructure required in an area. Page 8 of the National Planning Policy Statement on Wastewater states that 'Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure. Adaption to climate change'.
			National policies and guidance
			national policies, be in general conformity with the strategic policies contained in the development plan for the area and contribute to the achievement of sustainable development.

Greer Pritchard Planning obo	11.06.15	Email	These representations have been prepared by GreerPritchard Planning Consultancy on behalf of our client Plotlife Developments LLP in respect of the Regulation 16
			If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/
			Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/
			Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/
		It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's ro in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/	
			system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.

Plotlife	Wisborough Neighbourood Plan.
Developments Ltd	
(029)	The points covered in this statement relate primarily to the flaws in the consultation process in the development of the WGNP. In addition, this representation also draws attention Housing Policy HO2 which can be interpreted in a manner that leads to the exclusion of some older people in the housing market.
	Consultation and site selection methodology
	It is understand that the methodology and criteria for site selection for future development intends to provide an indication of suitability and is not an exact science. Nonetheless, the process is a ranking system which draws conclusions about which sites should be considered for development and which sites should not. In this regard, any site selection methodology needs to be clear and consistently applied so that the reader is able to easily cross- reference the ascribed values of each site. If easy cross-referencing isn't possible any subsequent consultation will lack robustness and transparency for the community and stakeholders.
	The WGNP employs a traffic light selection system. This system underlies all subsequent consultation and ultimately the site section policy. This basic pass/fail type of grading system doesn't allow the reader to adequately compare the strengths and opportunities of each site particularly when the traffic lights are present on some evaluation criteria for some sites and not on others.
	This inconsistency relating to use of traffic lights lacks transparency as the tallying of traffic lights (green, amber, red) leads to a false set of assumptions. Those consulted are invariably given the impression that they are using a simple and clear comparative analysis when that is not the case. Given that the site selection methodology underpins much of the consultation we don't consider that the assessment tool has allowed for a robust and transparent process.
	It is worth noting that the Site Review Method for WGNP states that the traffic lights were added where comments were of 'significance'. The process for establishing 'significance' is unclear and therefore also lacked transparency.

Late changes to the WGNP

In addition, there is evidence that late developments and changes to the WGNP were not given adequate consideration through the consultation process. The Greenways Nursery site was granted permission on appeal (APP/L3815/A/2209917) for 10 new dwellings on

December 30th. While the appeal site has been incorporated into the Regulation 16 Neighbourhood Plan and associated documents no new character or infrastructure assessment has been consulted on prior to its inclusion. We considered that further evaluation of the Kirdford Road area is required to ensure that earlier assessments informing the development of WGNP remain valid and to ensure that the Inspector's findings in relation to the Kirdford Road area have been fully considered through adequate consultation.

A late addition to the WGNP not included in the Pre-submission Neighbourhood Plan is a position regarding not extending the settlement boundary to include this site (Greenways Nursery) because:

- a. The site is remote from the existing settlement boundary and does not form part of the compact village centre.
- b. There is no footpath linking the site to village facilities.
- c. The appeal decision has a degree of temporary use as the homes are caravans and are capable of being removed.

We don't consider that the consultation process to date has been able to adequately consider this policy direction particularly given that decisions will be taken through the WGNP about the potential connectivity and improved sustainability for development in this part of the village.

Housing provision for old people

			Policy H02 of the WGNP is as follows:
			All future development with the Plan Area must contain a mix of housing types to suit the demographic characteristics of the Parish as detailed in site- specific policies SS1, SS2, SS3, and SS4. A proportion (around 50%) of all new housing shall be designed shall be designed to be appropriate for occupation by elderly persons and/or first time byers or those on lower income. Each unit should meet 'Lifetimes Homes' Standards and be either 1 or 2 bed properties.
			Whilst the policy appears to be inclusive and responsive to the needs of the older people it is in fact a one size fits solution for this segment of the population. 'Lifetime Homes' standards can benefit aging people and allow them to stay in their homes longer but they should not be considered as a full housing response to the needs older people. The recent consultation response by the Wisborough Green Parish Council to planning application WR/15/00032/Out clearly demonstrates that this policy is seen as the only solution for older people's housing going forward. It does not recognise that some older people will need assisted living arrangements. Unfortunately this interpretation serves to exclude different models of housing including sheltered accommodation. In this regard we considered that Policy H02 has the potential to discriminate against older people and should therefore be reconsidered to recognise the need for different models of housing.
Steve Rollinson (030)	11.06.15	Email	Opposition to Winterfold Development The only time Winterfold was considered by the community as part of a choice with other sites (2006) it came second to last. Including it in the draft plan without taking account of this undermines the entire consultation process especially as there are other alternative sustainable sites preferred by the community available. Including it in the final draft with no options from which to choose does not encourage proper response or allow it to be judged against the merits of other sites.
			Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it – why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when

			considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location. There has been no transparency in the way the publics expressed views have been discounted. There is no buffer between the Winterfold site and the conservation area. This is in contradiction of the direct planning policy of the council. The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap. The NP also says it's close to the village centre, it would be but for the fact that the entrance is located some way down Durbans Road which is in fact almost 500m from the village shop. Kirdford Road sites are now established as sustainable by the granting of permission by a planning inspector for mobile homes, so why are the most preferred adjacent sites of Carters field and The Nurseries being ignored in the plan. Surely the logic for rejecting these sites should have been revisited to see if the wishes of the community could now be accommodated given the inspectors opinion. The fact that Greenways was included at the last minute without further consultation on the impact of this on the whole plan undermines the whole consultation process. Had further consultation been allowed then this may we
Sue Jerges (031)	11.06.15	Email	I strongly oppose the selection of Winterfold on Durban's Road as a site for building. The 'neighbourhood plan' is supposed to reflect the villagers' stated preferences for building new homes, however, it clearly does not. I am extremely concerned about the following points in relation to the proposal of Winterfold;
			•The only time Winterfold was considered by the community as part of a choice with other

sites (2006) it came second to last. Including it in the draft plan without taking account of this undermines the entire consultation process especially as there are other alternative sustainable sites preferred by the community available. Including it in the final draft with no options from which to choose does not encourage proper response or allow it to be judged against the merits of other sites.

- Access to the development would be via Durbans Road. Durbans Road is already compromised by cars parking for the Cricketers and the houses around the pub. The road is dangerous and speed is already a concern on this road with traffic accelerating from the bend adjacent Sweaphurst Farm towards the site. This was cited as an objection to the site in 2006 but has not been taken into consideration at all within this plan. No traffic calming has been offered by the developer despite it being cited as an issue within the NP why has the opportunity not been taken to require this of the developer?
- Winterfold is a greenfield site. Throughout the consultation process the village has favoured brownfield sites. Only one was selected originally (Clarkes Yard) and Greenways was added at the last minute when planning was granted for 10 static mobile homes and another greenfield site was dropped (Glebe Field) to accommodate it why was the community's view and preference not taken into consideration? We assume because the plan had to comply with national and local policy, but the council's own solicitor has advised when considering an objection to the Loxwood NP that the Neighbourhood plan should reflect the views of the community and does not, legally, have to be in accordance with either national planning policy or the district's local plan. Practically all of the brownfield sites that the villagers preferred have been excluded from the neighbourhood plan, aside from Clarkes Yard and the one forced on them by the successful appeal for the ten mobile homes. Had Greenways been included originally the village may well have ended up with a better class of development at this location. There has been no transparency in the way the publics expressed views have been discounted.
- The visual impact of up to 30 houses in open view when travelling south along Durbans Road would be massively detrimental to the character of the village and severely harm the open characteristic of this part of the village. The NP says it will have "minimal visual impact" this is clearly a totally false statement. The development will also be highly visible from Newpound Lane where it appears to overlap the local gap.

Surrey County Council (032)	03.06.15	Email	The footpath opposite the site on Durbans Road that provides access to the village contravenes planning policy. It is 1m wide at best and it should be at least 1.8m wide. How is it possible to increase this without encroaching on the road or into the hedge and private gardens. Is the site deliverable? Access is also proposed via Newpound Lane. The PC have themselves acknowledged that this is a single track road and has issues with speeding traffic. It is not possible to provide pedestrian access from this point and additional traffic will cause an even greater risk to the school – an area already blighted by lack of access and parking at key pick up and drop off times. No comments.
Vanessa Palmer (033)	11.06.15	Email	Figure 8 on page 33 shows the 'local gaps', and these are shown as black hatching on the map. The area covered by the hatching on the western side of Kirdford Road is shown inaccurate as the hatching covers a number of houses (i.e. not local gap) along a stretch of the road. These properties include Wheelers Farm, Shelen Cottage, Gravatts and Wilton Cottage. The diagram therefore inaccurately depicts the green area on this side of Kirdford Road as being much more significant than it really is, as the hatching should only really apply to the opposite (eastern) side of the road where there is a large grass field. It should also be noted that the final four proposed sites involve developments of a significant size. This goes against the feedback received from the local people in the consultation process, the majority of whom were in favour of "small sites distributed around the village" (please see page 63, 'Site Assessments & Allocation', under point 2. Make correction to Figure 8 per comments above.
Waverley BC (034)	10.06.15	Email	Having reviewed the plan, I can confirm that Waverley does not wish to make any comments to it.
Wisborough Green	11.06.15	Email	Please note:
Parish Council (035)			Blue – explanation for proposed change Red – proposed new wording
			Amendment 1: SS4 Winterfold, Durbans Road Page 73, Para 11 A full site survey has now been undertaken by the landowner. At a meeting held with the agents, it was explained that the survey identified the north-east corner of the site as

potentially being a more suitable area for a biodiversity area due to an existing pond; a further balancing pond would be created in this area. Confirmation has also been received from the school that the area might be used, but on an ad hoc basis, hence close proximity to the school is not necessary. For these reasons, the Parish Council has approved an amendment to the policy and would like to submit this change.

<u>Current Paragraph</u>: An area facing Newpound Lane and adjacent to Garmans will form an area dedicated to biodiversity to act as a resource for the school and wider village.

<u>To be replaced with:</u> An area for biodiversity to achieve a net gain of approximately a third of a hectare will be located on the site in addition to areas within the site requiring protection due to the presence of protected species.

Amendment 2: Development Allocation Policy

The rationale behind adding a planning condition on occupation is that this is seen as the only way to successfully influence phasing of construction. Cash flow issues mean that developers will not build if they cannot be sure of occupation; therefore the performance condition potentially requires collaboration between sites and developers. In reality it is expected that delivery will be site by site so having a limit of 25 units per year allows sites to come forward independently. Normal output for house builders is one unit per month, so there is an expectation for the larger sites to be built out in two years. This policy may serve to make developers compete to be the first to develop in the village and that serves to assist with housing supply in the short term.

Performance conditions on occupation are commonly used and meet the six tests in the NPPF.

Necessary - It is necessary to make the development acceptable in relation to impact on the village.

Relevant to planning - The impacts are readily attributable to the development for which permission is sought.

Relevant to the development to be permitted - As above, the development proposed are dwellings where the additional impacts from the population may impact on the village.

			Enforceable - It can be readily enforced against by requiring the developers to stop occupying the dwellings if the condition is exceeded - it may need to be registered as a land charge to take full effect.
			Precise - The wording proposed is precise.
			Reasonable in all other respects - Given there is no alternative to secure phasing, the condition seems reasonable to allow the developments to assimilate successfully in the village.
			Amend justification text, para 6, page 30 to reinforce the community's wish for phasing of development. To read as follows:
			Through During the consultation process, the community has indicated that it would like small scale development distributed throughout the settlement area, and preferably built on a phased basis over the 15 year Plan period. The importance of phasing has been emphasised by the community, to not only lessen the impact upon the village but to allow for gradual social integration of new residents.
			Amend Policy OA1: Development Allocation Policy Page 31The policy to now read: The Wisborough Green Neighbourhood Plan will provide for a minimum of 60 houses on allocated sites as defined in Policies SS1, SS2, SS3 and SS4 and consistent with the spatial strategy for the village. A phased approach will be taken according to local need and requirements for housing, but also in order to minimise disruption to the village and its transport network. Planning conditions will be applied to the planning approvals to ensure that there are no more than 25 additional dwellings being occupied in any one calendar year.
			Amendment 3: Housing Background, Page 21, Figure 5 Percentage figure in table deleted in error during editing of Pre-Submission document. 9% to be inserted in blank column for 'No Bedrooms/1 Bedroom Property'
WSCC (036)	08.06.15	Email	The County Council has previously provided comments on the Neighbourhood Plan, and would like to re-state comments regarding the following:

Chichester District Council (037)	11.06.15	Email	See separate document
			Given that the Submission Neighbourhood Plan for Wisborough Green includes the proposed allocation of small scale housing sites, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order. The County Council provided general Development Management guidance in response to the Pre-Submission consultation.
			The amendments confirm the requirement for effective consultation between developers and West Sussex County Council in respect of potential mineral resource sterilisation, in line with the requirements of national policy.
			'The Chichester Local Plan requires that all development within a West Sussex Minerals Consultation Area must be considered against the latest Minerals Consultation Area guidance and policy produced by West Sussex County Council. Preparation of site plans for development proposed through the Wisborough Green Neighbourhood Plan will require liaison with West Sussex County Council at an early stage to ensure that potential mineral interests are fully considered in planning development.'
			If the amendment to the three policies cannot be achieved, instead the supporting text for each of the sites or the preamble set out on page 63 should be supplemented with the following:
			'development phasing and layout has regard to the need to safeguard minerals deposits within and adjoining the site, as shown on the CDC Policies Map'.
			The Site Specific Policies for the three new housing sites set out through policies SS1, SS2 and SS3 could each be supplemented by the inclusion of the following text: