

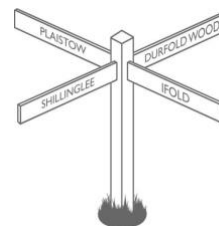
# STATEMENT OF CONSULTATION

## PLAISTOW AND IFOLD PARISH - NEIGHBOURHOOD PLAN

For the adopted Chichester Local Plan: Key Policies 2014-2029 (CLPKP)

### CONTACT:

The Parish Clerk, Miss Catherine Nutting  
7 Glebelands, Loxwood  
West Sussex RH14 0SW  
E-Mail: [clerk@plaistowandifold.org.uk](mailto:clerk@plaistowandifold.org.uk)  
Website: [www.plaistowandifold.org.uk](http://www.plaistowandifold.org.uk)



## **1. INTRODUCTION**

- 1.1** With consideration given to the National Planning Policy Framework (NPPF) and the Chichester District Council (CDC) Local Plan Key Policies 2014-2029 (CLPKP), Plaistow and Ifold Parish Council brought together residents, landowners and stakeholders from the four parish settlements of Ifold, Plaistow, Durfold Wood and Shillinglee, with a view to developing a Neighbourhood Plan as defined by the Neighbourhood Planning (General) Regulations 2012.
- 1.2** This Statement of Consultation explains how Plaistow and Ifold Parish Council has undertaken consultation with residents, landowners and stakeholders to produce the Plaistow and Ifold Parish - Neighbourhood Plan.
- 1.3** The Neighbourhood Planning Regulations 2012 sets out that a Parish should include a consultation statement: (Regulation 15 part 2) (2). In this regulation “consultation statement” means a document which:
- contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explains how they were consulted (the methods of consultation used);
  - summarises the main issues and concerns raised by the persons consulted; and
  - describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

## **2. BACKGROUND**

- 2.1** Plaistow and Ifold Parish is located in the North-Eastern part of Chichester District. It is slightly more than 20 square kilometres in land area, stretching from Parkgate in the West to the Wey and Arun Canal in the East; and from Dungate in the North to Wephurst Furze in the South. The Parish includes a significant proportion of sparsely populated open land, including farmland as well as large areas of ancient woodland and disproportionately low levels of industrial activity. It also has four principal settlements (in order of population): Ifold, Plaistow, Durfold Wood and Shillinglee.
- 2.2** The Parish Council considered the geographic area to which The Plan should relate and at its meeting of 26 June 2012 agreed the application area for the Neighbourhood Plan should be identified as the existing area of the Civil Parish of Plaistow and Ifold. The area covered by the proposed Neighbourhood Plan is as outlined on the appended Map. A small part of this area (12.11%) which lies along the western boundary, is within the South Downs National Park Authority (SDNPA) and this statutory body is therefore being consulted on this application where appropriate.
- 2.3** At its meeting on the 26 June 2012, the Parish Councillors were unanimous that in the interests of the Parish and its residents, it should proceed with an application to the Local Planning Authority (LPA), CDC, to seek designation of the Neighbourhood Plan area. A formal letter of request was made to CDC on 2<sup>nd</sup> July 2012.
- 2.4** The Neighbourhood Plan Area for the Parish was officially designated by CDC in a letter dated 6<sup>th</sup> November 2012.
- 2.5** The Parish Council formed a Parish-wide Steering Group in July 2013, comprising of Parish Councillors and local residents to undertake evidence gathering to inform the creation of a Neighbourhood Plan and to make day-to-day decisions on the work required and to report to the Parish Council at each parish council meeting. Final decision-making remained with the Parish Council for resolution at public meetings.

### 3. CONSULTEES, STAKEHOLDERS AND LANDOWNERS

3.1 Throughout the process of collating, scrutinising and assessing large amounts of information/data in order to assemble our draft Neighbourhood Plan (NP), it was necessary to consult with many public and private specialised teams to assist in this task, most of which are listed below:

- Chichester District Council – Planning
- Chichester District Council – housing department
- Hyde Housing Association
- South Downs National Park Planning Authority
- West Sussex County Council – Highways
- West Sussex County Council – Education Department
- West Sussex County Council – Footpaths and Bridleways
- Southern Water
- The Environment Agency
- Historic England
- Department of Communities and Local Government
- Planning (Listed Buildings and Conservation Areas)
- Central Government – National Planning Policy Framework
- Chichester District Council Adopted Local Plan
- The Glass-House Community LED Design
- Action in Rural Sussex (AirS)
- Chris Broughton Associates
- AECOM
- Colin Smith Planning
- The National Forestry Inventory
- Natural England
- Ecology and Habitat Regulations

3.2 At Regulation 14 a formal six-week consultation was undertaken with consultees and stakeholders ([Appendix A - Statutory Consultees](#)), local residents and landowners. Consultees, stakeholders and landowners outside of the Parish were contacted directly by letter with links to the dedicated Neighbourhood Plan website where the draft pre-submission Plan and supporting evidence could be viewed. Comments were invited during the 6-week consultation period from 8<sup>th</sup> September to 20<sup>th</sup> October 2017. Their comments and the responses and actions are detailed at Appendix B.

#### Landowners

3.3 Throughout The Plan production and in order to determine availability of sites for development, landowners have been consulted. Where potential sites have been identified by the Parish Council and Steering group, landowners have been contacted to determine availability of the site in writing and meetings held.

3.4 Some landowners have also presented their own sites for evaluation by the Steering group, and for presentation through the consultation process to parish residents. This includes land at Durfold Wood, Land at little Springfield Farm -Brownfield site, Foxbridge Golf Course, Land to rear of Sycamore Cottage, Rickmans Lane and Land at Lyons Green, Plaistow.

3.5 Where sites have been discounted or taken forward, landowners have been contacted either by letter/emails or meetings to advise them of the outcome. Meetings have been held with the landowners, mainly those who live in the parish and the Hyde Housing Association, who control access to the Todhurst site. Meetings were held for the following sites;

- i) Little Springfield Farm (brownfield site) to advise on the outcome of the AECOM site assessment.
- ii) Land to the rear of Ashfield adjoining Land adjacent to Todhurst, to determine interest and evaluate access issues.
- iii) Land adjacent to Todhurst to advise on the access difficulties and the response from the housing association controlling access.
- iv) Land opposite the Green to advise that this site was to be allocated in the pre-submission NP following the discounting of Land adj. to Todhurst and land to the rear of the Dairy.
- v) Land to the north of Little Springfield Farm to advise of the AECOM report and CDC Site Allocations Development Plan Document (SA DPD) allocation.

3.6 Letters and e-mail correspondence has taken place with the trustees for the land to the rear of the Dairy in relation to availability and access difficulties.

## Chichester District Council

- 3.7** CDC is the lead planning authority for The Plan. Where specific information was required, the Parish Council / Steering Group contacted the CDC Neighbourhood Plan Officer, generally by e-mail correspondence. The CDC Housing Department helpfully provided written housing data and information for the Parish and contributed to the site evaluation at Land Adj. to Todhurst with the Housing Association. Two CDC Planning Officers attended the site evaluation walk-about for Ifold but were unavailable for the Plaistow walk-about.
- 3.8** Following contact from the landowner the Parish Council became aware of the CDC allocation of a site through the Site Allocation DPD. Meetings were held with Senior Planning Officers and the Neighbourhood Plan Officer on 8<sup>th</sup> October 2015 ([Minutes](#)) to outline the site evaluations already undertaken by the Parish Council and to request that allocation be made via the Neighbourhood Plan in consultation with local residents, whilst taking on board their concerns and views. CDC officers explained the need for the District Council to determine their housing allocation and required that the NP reach pre-submission stage by March 2016 before CDC would remove their DPD site allocation. CDC officers agreed to assess the Plaistow sites proposed by the Steering group which they had not considered in their SA DPD. The March 2016 pre-submission date was not met. The Parish Council responded to the SA DPD formal consultation in February 2016.
- 3.9** A meeting was held with senior officers and the Neighbourhood Plan officer in April 2016 to discuss the outcome of the Parish consultation in January /February and the Questionnaire response particularly in relation to site allocation. The sites were discussed together with the site allocation in the SA DPD. CDC gave advice regarding drafting a pre-submission plan for submission to CDC for a screening opinion. ([Minutes](#))
- 3.10** A further meeting was held with senior CDC officers and the Neighbourhood Plan officer in September 2016 ([Minutes](#)) to discuss the conclusion of the AECOM Site Assessment and Options Report. CDC officers did not accept the conclusion of the report. CDC officers declined to remove their site allocation in the SA DPD even though the Parish Council had selected a site to go forward in the draft Pre-submission Plan.
- 3.11** A post Regulation 14 meeting was held with senior officers in November 2017 to discuss CDC's response to the pre-submission plan. (Meeting Notes)
- 3.12** 5<sup>th</sup> July 2018 meeting with CDC senior officers, Peter Wilding (Plaistow District Councillor), Stuart Woodin (AECOM representative advising the Parish Council), Parish Clerk, and Steering Group members to discuss requirements to move the NP to Regulation 15 submission.
- 3.13** Following Regulation 15 Submission on 31<sup>st</sup> August 2018, the Parish Council received an email from CDC acknowledging receipt (6<sup>th</sup> September 2018). A further e-mail from the CDC Neighbourhood Planning Officer (19<sup>th</sup> October 2018) explained delays in processing due to staff shortages and a recent judgement by the European Court of Justice (ECJ) in relation to Habitat Regulations ([People Over Wind, Peter Sweetman v Coillte Teoranta \(C-323/17\)](#)).
- 3.14** January 2019, CDC's SA DPD was formally adopted to include a site allocation for this Parish to deliver the CLPKP indicative housing number of 10 units at Land to the North of Little Springfield Farm, Ifold.
- 3.15** The Neighbourhood Plan was not formally accepted by CDC for Regulation 15. On the 26<sup>th</sup> March 2019 an e-mail was received from CDC, requiring updates to the Neighbourhood Plan, SEA, and Habitat Regulation Assessment (HRA) to reflect the outcome of the ECJ ruling the changes to NPPF (February 2019).

## 4. STAGES OF THE PUBLIC CONSULTATION

- 4.1** This section gives a concise narrative of the consultation process with the parishioners leading to the production of the Pre-submission Draft of the Neighbourhood Plan (NP), what method of consultation was undertaken, with whom, and the outcome. Throughout the production of the Neighbourhood Plan a report has been made to the Parish Council public meeting, advertised on notice boards and on the Parish council website, as an agenda item. Where specific resolutions have been made relating to the NP these have been published on the website and through social media. The Parish council meets approximately every 6 weeks and where necessary extraordinary meetings have been called to deal with specific matters relating to The Plan. These meetings are allocation where residents have been able to attend and raise any queries and obtain answers, during the whole process. There have been a number of meetings when quite large numbers of residents have attended to air their views. Both the Chair and the Clerk have made themselves available at any time to respond to residents' specific queries. As the NP activities and evidence base grew a dedicated website linked to the Parish Council website was developed by the NP co-ordinator. A summary table of the consultation and outcome is provided in the following Section 5.

### Early Consultation, Pre-designation of Neighbourhood Plan area

- 4.2 Early 2012:** The Parish Council instructed Action in Rural Sussex (AiRS) to undertake a **Village Design and Housing Needs Survey Report** via a questionnaire sent out to all households in the Parish. 792 questionnaires were mailed with a return date of 30<sup>th</sup> April 2012. 269 surveys were returned, a response rate of 33.6%. The survey was to provide information and data for the production of a Village Design Statement. Although this pre-dates the designation of the Neighbourhood Plan area, the key findings are still considered relevant in providing a base of information about the Parish and parishioners' views on development and housing and how they live in the Parish. The information gathered was used to inform further data gathering and survey work. There is a consistency in the responses from residents, for example, a clear majority expressed the view that the style of new buildings should be predominantly similar to those in the Parish and this response comes out in later consultations and informed the draft NP Policy H4. A further example; the majority of respondents (78%) use the parish to walk for pleasure, further evidence in later consultations established a need for greater public right of way connectivity, resulting in draft NP AIM-T1 [AiRS Village Design Housing Needs Survey](#).

### Plaistow Village Trust Consultation with Plaistow, Durfold Wood and Shillinglee

- 4.3 May 2012:** The Plaistow Village Trust, a non-statutory body and representing only residents from Plaistow, Durfold Wood and Shillinglee (those who are subscribed members), delivered a circular to 300 households in Plaistow, Durfold Wood and Shillinglee inviting them to attend a public meeting on **22<sup>nd</sup> May 2012** to present an overview of the NPPF (2012). Approximately 50 people attended the meeting where they agreed to a representative committee of volunteers from the community of Plaistow, Durfold Wood and Shillinglee be formed to collect and collate information, and to liaise with the 'community' and the Parish Council throughout the development and submission of the Neighbourhood Plan by the Parish Council.
- 4.4 25<sup>th</sup> June 2012:** Mark Raeside QC on behalf of the Plaistow Village Trust wrote a [letter](#) to the Chairman of Plaistow and Ifold Parish Council '*to record that the Trust acting for that part of the Parish as concerns Plaistow, Durfold Wood and Shillinglee only have set up a procedure to obtain the views of the parish community for incorporation into the Neighbourhood Plan as defined and required under the NPPF (March 2012).*'
- 4.5 May - September 2012:** Four evening meetings were held by the Plaistow Village Trust and Plaistow Steering Group in the Winterton Hall, Plaistow on [22nd May 2012](#), [20th June 2012](#), [18th July 2012](#) and [26th September 2012](#). Residents were invited by leaflet drop to attend each meeting, where information relating to pre-determined questions, which were published prior to the meeting, was presented by the Plaistow Steering Group via a formal presentation. The attendees raised any questions for discussion following the presentation. This was followed by a vote, by show of hands, for each decision taken. In total there were 145 attendees at the meetings, see [Policy report produced by the Plaistow Village Trust](#). The questions and responses are summarised under Section 5.

## 6<sup>th</sup> November 2012: Designation of Neighbourhood Plan Area

- 4.6 26<sup>th</sup> June 2012:** The Parish Council considered the geographic area to which The Plan should relate and at this meeting agreed the Neighbourhood Plan area should be identified as the existing area of the Civil Parish of Plaistow and Ifold. At this meeting Parish Councillors were unanimous that in the interests of the Parish and its residents, it should proceed with an application to the Local Planning Authority, CDC, to seek designation of the [Neighbourhood Plan Area](#).
- **2<sup>nd</sup> July 2012:** The Plaistow and Ifold Parish Council wrote a formal letter to CDC requesting designation of the Neighbourhood Plan Area.
  - **6<sup>th</sup> November 2012:** The Neighbourhood Plan Area for the Parish was officially designated by CDC.
  - **14 March 2013:** – The South Downs National Park Authority (SDNPA) designated the area of Plaistow & Ifold Neighbourhood Area within the South Downs National Park following an application from Plaistow & Ifold Parish Council.

## Setting up of Ifold Focus Steering group and Ifold Consultation May 2013

- 4.7 12<sup>th</sup> December 2012:** Following the work carried out by the Plaistow Village Trust and the Plaistow Steering group, the Parish Council recognised that consultation with Ifold residents on the Neighbourhood Plan should commence. Following direct mailed invitation to all Ifold households, on 12<sup>th</sup> December 2012, a public meeting was held in Kelsey Hall, Ifold for residents of Ifold. It was chaired by the Chairman of the Parish Council and addressed by Mark Raeside QC. A brief history of the Parish was presented and information on Neighbourhood Planning and the current progress by other parts of the Parish in preparation on the Neighbourhood Plan. Approximately 50 residents attended and those present were invited to make themselves known to the Chair if they were interested in forming an Ifold NP Steering Group, to gather evidence in respect to the settlement of Ifold. A first meeting of the Ifold Steering Group was held in January to formulate a group and nominate a Chair with formal meetings from February 2013 working toward consultation with Ifold residents in May. [Minutes of meetings](#).

### Ifold Consultation -Past Present and future

- 4.8 16<sup>th</sup> and 17<sup>th</sup> May 2013:** A two-day consultation exhibition titled Ifold Past Present and Future was held at Kelsey Hall, Ifold to further engage and inform the residents of Ifold as to the need for their personal involvement and to actively comment and share their views on how the settlement of Ifold should evolve in the future, what was valued, what was needed to be protected and where improvements could be made. Residents were invited to attend by a letter sent by mail to each household, together with roadside advertisement. The community was involved in the presentation of material from local societies, groups, nursery school and businesses. Residents attended over the two days. ([Presentation](#)). Throughout the exhibition residents of all age groups were asked to comment. Post- it notes were used to gather comments, these were retained and collated. ([Summary of the Findings](#)). The findings again were used to inform the NP draft and policies, see summary table Section 5.

## Parish-wide Consultation

### Formation parish-wide Steering Group

- 4.9 July 2013:** The Parish Council formed a Parish-wide Steering Group in July 2013 bringing together the Plaistow Steering Group and the Ifold Steering Group. The Parish wide Steering group comprised Parish Councillors and local residents involved in the two settlement Steering groups to take forward the evidence already gathered by the two groups, gather further evidence as needed to inform the creation of a Neighbourhood Plan. The Parish Steering group was tasked to make day-to-day decisions on the work required and to report to the Parish Council at each parish council meeting. Final decision making remained with the Parish Council for resolution at public meetings.

### Steering Group and Parish Council workshops led by The Glass-House Community Led Design consultancy

- 4.10** The Glass-House Community LED Design consultancy was approached by the Parish Council for support and assistance to the Neighbourhood Plan Steering Group in the summer of 2013, as they had worked successfully with the adjacent parishes of Kirdford and Loxwood on the early stages of the development of their Community and Neighbourhood Plans. This work has developed a familiarity with the wider area and the local context of Chichester District and West Sussex County Council.

- 4.11 December 2013:** The Glass-House agreed to deliver an initial workshop in December 2013 to support the Parish Council's identified goal: to bring together local people from across the Parish to develop a Neighbourhood Plan that enhances the settlements within the area in a way that draws on the core skills of local residents. This initial workshop then led to a further two workshops facilitated by The Glass-House. The second meeting established a Vision Statement for the Parish. A report describes what was delivered and key findings, as well as making recommendations for the next stages of the development of the Plaistow and Ifold Neighbourhood Plan.
- 4.12 Between December 2013 and May 2014:** The Glass-House officers reviewed work that had already been carried out and have been involved in telephone conversations with members of the Steering Group, had a meeting and walkabout in Ifold with the Parish Council Chair, and two other members of the Steering Group and delivered three workshops. (see The Glass-House Community Led Design, [Project Support Report 2014](#)).

#### **Indicative Housing Allocation by CDC**

- 4.13** CDC had, under Policy 5 of the Chichester Local Plan: Key Policies 2014-2029, provided an indicative housing number of 10 units for the parish of Plaistow and Ifold.

#### **July 2014: Mapping exercise and Potential Site Evaluation**

- 4.14** Following advice and help from The Glass-House, a mapping exercise was undertaken by the Neighbourhood Plan Steering group to identify potential sites for housing allocation. This was followed by two walkabouts conducted by members of the Steering Group, one in Plaistow, on 2<sup>nd</sup> July 2014 and one on 23<sup>rd</sup> July 2014 in Ifold to view and evaluate those sites identified in the mapping exercise. The sites were evaluated using the CDC SHLAA form as a basis. These two settlements are the principle settlements and due to size and facilities would be capable of taking the housing allocation. The Ifold walkabout was attended by two planning officers from CDC but they did not attend the Plaistow walk about.

#### **Dedicated Neighbourhood Plan Website**

- 4.15 22<sup>nd</sup> October 2014:** A voluntary resident joined the Steering Group as Neighbourhood Plan Co-Ordinator and was instrumental in reviewing evidence, obtaining grants for funding and technical work, engaging consultants, and establishing a dedicated Neighbourhood Plan website linked to the existing Parish Council website. Prior to this, information was posted on the Parish Council website, and at each Parish Council meeting an update on the Neighbourhood Plan was given and minuted. The dedicated website allowed residents and consultees to access all the documents, minutes, supporting evidence and to access updates. A regular report to the Parish Council continued at meetings, where all decision making took place during public meetings and these are minuted.

#### **Impact of Crouchland BioGas Ltd: Unauthorised Development within the Neighbourhood Plan area**

- 4.16** During the latter part of 2014 and into first half of 2015 the Parish Council was very heavily involved in making representations against Crouchlands Bio Gas Ltd. A dairy farm that had expanded unlawfully into an extremely large (one of the largest in Europe) and contentious Bio Gas plant. The development on one of the farms in the Parish had been built without planning consent and a retrospective application was made in August 2014. WSCC Officers were recommending the application for approval. This involved considerable amount of the Parish Council's time and resources disputing this, requiring the instruction of specialist planning and legal advice, and obtaining a Queen's Council Opinion. This resulted in activity on the Neighbourhood Plan slowing throughout this period. It should be noted that throughout the production of the Neighbourhood Plan the need to deal with the highly complex planning issues arising from this unauthorised development has impacted heavily on the available time and resources of the Parish Council and residents in the Parish, who are all voluntary. After a Public Hearing and 10-day Public Inquiry, at which the Parish Council was a Rule 6 Party, the Appeal was dismissed in October 2017.

#### **Chichester District Council Site Allocations Development Plan Document (SA DPD) - Site allocation**

- 4.17** During the first half of 2015, CDC prepared the Site Assessment Development Plan Document (SA DPD) with a call for sites. CDC made no contact with Plaistow and Ifold Parish Council during this time to determine the progress of the emerging Neighbourhood Plan. CDC considered a number of sites in the Parish through their DPD document and made a site allocation for a location known as Land to the North of Little Springfield Farm. This site, along with a number of other sites in the Parish, was under consideration by the NP Steering group. A meeting was held with CDC planning officers in October 2015 ([Minutes](#)) to outline the sites the Neighbourhood Plan Steering group had identified and to request that CDC allow the site selection process to be undertaken through the Neighbourhood Plan. CDC Officers explained that they needed to show how they could meet their housing number and would only consider alternative site options provided the NP progressed to pre-submission stage by March 2016.

## Site evaluation and Further Public Consultation and Questionnaire January /February 2016

- 4.18 Autumn 2015:** The NP Steering group through Autumn 2015 worked on site assessments. The methodology and assessment criteria utilised to accrue a suitable list of development sites, which would be capable of providing a minimum of 6 units each, or to accommodate the full CDC DPD requirement of 10 units, was executed in accordance with CDC's Strategic Housing Land Availability Assessment (SHLAA) Site Assessment criteria.
- 4.19 Autumn 2015:** In order to inform the Neighbourhood Plan a further survey was developed to gather more evidence needed, with the support of planning consultant, Chris Broughton Associates. This was formatted into a questionnaire to enable all residents to express their priorities, perceptions and views on a number of issues that had become apparent during earlier consultations, particularly:-
- Housing development in the Parish;
  - Housing need in the Parish;
  - Parish Infrastructure and amenities;
  - The need to retain and protect open spaces, land and buildings;
  - Support and scope for a Village Design Statement for Ifold;
  - Supporting business in the Parish.
- 4.20 31<sup>st</sup> January and 7<sup>th</sup> February 2016:** A further consultation phase with residents was entered into with a further two-day exhibition on two separate weekends, which was carried out on 31<sup>st</sup> January 2016 at Kelsey Hall, Ifold and 7<sup>th</sup> February 2016 at Winterton Hall, Plaistow. This was considered a comprehensive way to deliver information and obtain feedback from as many people as possible. The exhibition was linked to the mailed delivery of the questionnaire to all households in the Parish. Information in the exhibition would aid responses to the questionnaire. Residents were encouraged to participate through roadside advertising, news publications and social media. The guidance notes and consultation/exhibition documentation relating to this 2nd phase consultation were made available on the website for residents to view as well. In this way information was disseminated to as many residents as possible, both via the physical exhibition and the on-line contact.
- 4.21** At the exhibition, information was presented on all sites (first sieve) that had been considered to meet the Parish housing allocation. The analysis of each site and then how sites were either discounted or taken forward to the second sieve. A detailed list of maps pertaining to each proposed development site, settlement boundaries, conservation boundaries, flood zones and indicative housing densities, can be viewed [following this link](#). Also included is a table showing the sites which were selected to go through to the draft Neighbourhood Plan. All sites which have been considered throughout the process of scrutiny and validation, including each of their SHLAA reports and photographs can be viewed at the PIPNP website, following this link: [Sites Assessment](#).
- 4.22** There was also a 'Call For Sites', to elicit further sites that the Steering Group may have missed. Local maps were presented to assist residents. Post-it notes were used again to facilitate responses. Several further sites came forward through the 'Call For Sites', which closed 8<sup>th</sup> July 2016. These were all evaluated using the same methodology as the earlier sites and details published on the website and reported to the Parish Council meeting.
- 4.23** Attendees at the exhibition were also invited to indicate any additional places of heritage and natural assets of the Parish, which residents might like retained and protected by policies in our Neighbourhood Plan, in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life for this and future generations. The buildings, monuments, archaeological sites, places, spaces, valued landscapes and geological conservation interests to be in addition to those already designated in Sites of Special Scientific Interest, Grade I/II Listed, within the South Downs National Park or protected by the Plaistow Conservation Area.
- 4.24** The various comments raised by the residents at this consultation were collated, analysed and incorporated in the evidence based protocol. [Jan-Feb 2016 Consultation Comments](#).
- 4.25** Coupled with the exhibition was a Questionnaire and residents were encouraged to complete and return this during February 2016. Chris Broughton Associates handled the distribution by mail with household addresses supplied by CDC and return of questionnaires. A detailed analysis and Executive Summary of the recent survey was carried out on behalf of the Parish Council by Chris Broughton Associates (CBA), in March 2016, the aim of which was to deliver the evidence base to guide policies in the draft Neighbourhood Plan. [Final Report and Executive Summary](#).

## Chichester District Council Public Consultation on SA DPD

- 4.26** CDC ran a public consultation on their SA DPD document in January/February 2016. Following the parish public consultation on the NP and sites, on 18<sup>th</sup> February 2016, the Parish Clerk, Mrs. Beverley Weddell, on behalf of the Parish Council, submitted representation to the CDC SA DPD. See copy attached Appendix C.



## Site Allocation and Planning Consultancy Advice.

- 4.27 26<sup>th</sup> May 2016:** The Neighbourhood Plan Steering Group presented to the Parish Council for ratification, the development site proposal for the Draft NP, based on the evidence accumulated since 2012 and to meet CDC's allocation of at least 10 residential units for this parish. [Minutes](#).
- 4.28** As part of the assistance offered to communities producing neighbourhood plans, grant aid via Locality was applied for and this offered access to professional planning consultancy assessment of the NP procedure to date. This was taken up by the Parish Council to determine whether the work on The Plan to date was robust and when drafted the Neighbourhood Plan would be more likely to be successful at Examination. Subsequently, the planning consultancy AECOM was appointed, by Locality, in May 2016.
- 4.29 28<sup>th</sup> June 2016:** In order to progress a selection of the most suitable development sites for inclusion in the NP draft submission, the Steering group sought agreement from the Parish Council to set a closing date for the 'Call for Potential Development Sites'. This was ratified by the Parish Council at their meeting on 28 June 2016 with an approved closure date of 8th July 2016. [Minutes](#).
- 4.30 2<sup>nd</sup> July 2016:** The Plaistow and Ifold Parish Neighbourhood Plan Steering Group had a display at the Plaistow and Kirdford Primary School Summer Fair on Saturday, 2<sup>nd</sup> July 2016, from 12 noon until 4pm. The objective being to further inform residents about the sites being proposed for potential housing development in this Parish, in order to meet our allocation of 10 units as set by CDC in the Local Plan, all as advertised on the Parish Council website. Also, residents were informed about Local Green Space designation and advised about the sites proposed for designation for Local Green Space in the Parish. Steering group members were available throughout the afternoon to answer any questions. (Display Documents: [Potential Sites for Parish Housing Development](#); [Local Green Spaces Information](#))
- 4.31 10<sup>th</sup> August 2016:** the AECOM Final Site Options & Assessment Report was completed on 10 August 2016 and presented to the Steering Group for their consideration. It set out the final position, as considered by AECOM.
- 4.32 26<sup>th</sup> August 2016:** The Parish Council post on their website information relating to the fact that as a result of AECOM's professional and technical advice, further consideration must be given to the six proposed sites which the Steering Group had considered against the housing allocation and incorporate into the draft NP. The details of this change can be viewed in the PIPNP communication on their website.

## September 2016:

### Further Public Consultation on Development Site Allocation, and proposed Local Green Spaces designation

- 4.33 6<sup>th</sup> and 8<sup>th</sup> September 2016:** As a result of the AECOM assessment, it was necessary to hold a further public consultation to accommodate the advice given by AECOM. The consultations were advertised as previously by roadside adverts, social media, the Parish Council website and news publication. Public consultations were held on 6<sup>th</sup> and 8<sup>th</sup> September 2016 at Winterton Hall Plaistow and Kelsey Hall Ifold. There were four x 1 hour evening sessions, two for each evening to allow as much opportunity for residents to attend. A half hour presentation was made on the potential sites for residential development and the information from the AECOM report ([Consultation Material](#)). The proposed Local Green Space sites were also presented. A further half hour was given for questions and answers. Attendees were invited to leave written comments or submit comments by the end of the week to the Parish Clerk. The comments were collated and reported to the Steering group meeting on 13<sup>th</sup> September, ([Analysis of comments received](#)).
- 4.34** The National Planning Policy Framework (paras 76-78) makes provision for local communities to identify green spaces of particular importance to them and which they would like to retain as amenity value for now and in the future. The Steering Group collated a number of Green Space locations in and around each Settlement and these were presented to the consultation evening 6<sup>th</sup> and 8<sup>th</sup> September. Attendees were invited to leave written comments or submit comments by the end of the week to the Parish Clerk. The comments were collated and reported to the Steering group meeting on 13<sup>th</sup> September. ([Analysis of comments received](#))

## Site Allocation and Pre-Submission Draft Neighbourhood Plan.

- 4.35 13<sup>th</sup> September 2016:** The outcome of the consultation was reported to the Parish Council meeting with a report from the Steering committee. ([Report to the Parish Council](#)) A resolution was passed to allocate Land adj. to the Dairy, Plaistow in the draft Neighbourhood Plan to meet our housing allocation and withdraw from the allocation of land at little Springfield Farm (brownfield) and Land adj. to Todhurst, Plaistow. ([Minutes](#))

- 4.36 28<sup>th</sup> September 2016:** The Parish Council Extraordinary Meeting held to consider the Pre-submission draft Neighbourhood Plan and submission to CDC for an SEA screening. 37 members of the public attended together with Colin Smith Planning, consultants retained by the Parish to draft The Plan. Attendees were able to ask questions which were answered by parish councillors and The Planning Consultant. After full consideration, it was unanimously agreed that the Pre-Submission Draft Neighbourhood Plan and Site Map for the Land Adj. the Dairy, Plaistow, be approved for submission to CDC to carry out a Screening process to consult the Environment Agency, Historic England and Natural England as statutory consultees. At the meeting an informal Questions and Answers sheet was laid out on each seat to help attendees understand some of the frequently asked questions. ([Answers to residents' concerns](#))
- 4.37 November 2016:**The questions and answers sheet was updated and circulated at Parish Council meetings and on the NP website and through social media to answer common question which kept arising from Parishioners. ([Questions & Answers](#))
- 4.38 17<sup>th</sup> January 2017:** Parish Council meeting at which 23 members of the public attended. It was resolved to move forward with the reserve site Land Opposite the Green because of difficulties with access for the site Land adj. to the Dairy arising from an adverse Arboricultural Report. A formal report was made by the Steering group. Members of the public were given the opportunity to ask questions and make their views known, before the resolution was taken.
- 4.39** An update report was posted on the NP website, Parish Council notice boards and social media to advise residents of the resolution and amendments. Parish Council minutes also available. ([Minutes](#))
- 4.40 28<sup>th</sup> February 2017:** A Parish Council meeting was held with 7 members of the public attending. After discussion, including representations from members of the public, it was unanimously resolved that the Draft Pre-Submission Neighbourhood Plan, as circulated, be submitted to CDC for a Screening Opinion. This was subject to adding the words 'in particular' in paragraph 3.13, amending the wording relating to the Local Green Space Map to indicate individual maps for the three settlements with LGS allocations and adding the word 'emerging' for all references to the Village Design Statement. ([Minutes](#))

## Strategic Environmental Assessment (SEA)

- 4.41 16<sup>th</sup> May 2017:** At the Parish Council meeting the NP update to residents and councillors it was reported that CDC had determined an SEA would be required. AECOM would be appointed to undertake the scoping exercise followed by the SEA. It was reported that it was hoped to be able to move to the Regulation 14 consultation in September. ([Minutes](#))
- 4.42 13<sup>th</sup> June 2017:** At the Parish Council meeting the NP update to residents and councillors it was reported that the Scoping Report had been completed by AECOM and sent out to the statutory consultees, who had five weeks to respond, by 10<sup>th</sup> July, to determine that the scope of the SEA is correct. Following this consultation, the SEA would be undertaken by AECOM, due to be produced by the third week of August. It was expected that the Regulation 14 Public Consultation would take place in September.
- 4.43 25<sup>th</sup> July 2017:** At Parish Council meeting NP update to residents and councillors it was reported the Scoping Report had been completed and responses received from the statutory consultees. The SEA was in hand. It was agreed that the SEA would need to be received before the Regulation 14 consultation commenced. The Examination of the Sites Allocation DPD had been deferred to 4<sup>th</sup> September and Colin Smith Planning Consultants would attend on behalf of the Parish Council to make representations to the Inspector.
- 4.44 29<sup>th</sup> August 2017:** An Extraordinary meeting of the Parish Council was called to receive the SEA. 10 members of the public attended. The SEA Environmental Report had been circulated prior to the meeting. The SEA was a positive report that considered the Neighbourhood Plan as a whole. The report made one recommendation to have regard to the Conservation Area in The Plan. There was no recommendation to make any amendments to The Plan before proceeding to Regulation 14. There were no comments from members and the report was accepted.

Representations were received from members of the public regarding the draft plan, who were advised to make comments during the Regulation 14 Consultation. Any comments made during the Regulation 14 Consultation would be considered by the Parish Council and Steering Group with responses and justification as to whether or not amendments were required to The Plan, would form part of the examination process and would be submitted to CDC under Regulation 15.

- 4.45** The Draft Pre-Submission Neighbourhood Plan and accompanying map had been circulated prior to the meeting. It was unanimously agreed that the Draft Pre-Submission Neighbourhood Plan would proceed to Regulation 14 Consultation. The six-week consultation period would commence on Friday, 8<sup>th</sup> September at 9am and end on Friday, 20<sup>th</sup> October at 5pm. The village halls had been provisionally booked for public exhibitions on Saturday, 16<sup>th</sup> and Sunday, 17<sup>th</sup> September. The exhibitions and consultation would be well publicised in the parish and statutory bodies and stakeholders would be sent a copy of The Plan and links to supporting documents.

## Regulation 14 Consultation: September - October 2017

- 4.46 8<sup>th</sup> September 2017: Start of 6-week Regulation 14 consultation period.** This was advertised by road side banners, adverts on notice boards, news articles in 'The Parish News', RH14 magazine, Neighbourhood Plan website, social media, places of assembly in the Parish including, Holy Trinity Church Plaistow, Plaistow Stores, Plaistow and Kirdford Primary School Plaistow, Kelsey Hall Ifold, and Foxbridge Golf Course Club House. The statutory consultees were notified and sent a link to the Pre-submission document electronically. Local stakeholders were contacted, and copies of The Plan provided. Landowners who were not residents of the Parish were also notified directly. All councillors held copies of The Plan. (See list of consultees and stakeholders contacted at [Appendix A – Regulation 14 Statutory Consultees](#)).

## Public Display for Regulation 14 Consultation

- 4.47 16<sup>th</sup> and 17<sup>th</sup> September 2017:** A Public Display of pre-submission draft of Neighbourhood Plan held over two days, one in Kelsey Hall Ifold the other in Winterton Hall Plaistow. Advertised as detailed in 4.47 above. Also, the material used in the display was available on the NP website. 90 people attended. At the display the key policies and site selection process was shown on display boards for people to read at their own pace. Attendees were encouraged to use the response forms provided in paper and advised they could submit their comments electronically if preferred. Councillors and Steering group members were in attendance to assist and answer any questions. [See Regulation 14 General Public Reg14 Representations \(8th September - 20th October 2017\)](#).
- 4.48 20<sup>th</sup> October 2017- January 2018:** At the completion of the Regulation 14 Consultation the Parish Councillors, Steering group members and Plaistow Village Trust members have analysed the comments made and the responses to those comments and amendments to The Plan required. In order to remove any element of bias the representations were considered without names and addresses and only a reference number given against each comment. Following a decision on the response the names only were re-inserted for publication. [See Regulation 14 Table of Amendments \(approved February 2018\)](#). All representations, public and statutory, and responses were made available and remain on the PIPC NP website. During the discussions a request was made to update the Question and Answer sheet produced the year before.
- 4.49 November 2017:** Parish Council and Steering group members met CDC officers who advised that in their opinion a further Regulation 14 consultation would be required as they were not satisfied with the SEA prepared by AECOM; this response was not accepted by AECOM. Following discussion with DCLG as to how to proceed, on **12<sup>th</sup> December 2017** the Parish Council resolved to make minor modification The Plan as required following the current Regulation 14 Consultation and through Locality send The Plan for a Health Check.
- 4.50 January 2018:** A group comprising Parish councillors, who are also Steering group members and Plaistow Village Trust members have revised the Question and Answer sheet to try and provide answers to common questions which are still arising and are clearly evident in the Regulation 14 comments. This was issued through social media, parish notice boards and posted on the Neighbourhood Plan website. ([Questions and Answers](#))
- 4.51** On professional advice the Parish Council requested a Health Check through Locality, on the Draft Plan. The Health Check Inspector's report was received April 2018, and consequently amendments were made to The Plan (see Section 7. below). The outcome of the Health Check was reported to the Parish Council, and the amendments and the revised Plan were ratified by the Parish Council on 19<sup>th</sup> June 2018, and minor amendments 15<sup>th</sup> July 2018 with a resolution to submit The Plan to CDC at Regulation 15.

## Regulation 15 Submission August 2018 and amendments to The Plan 2019

- 4.52 5<sup>th</sup> July 2018** Meeting with CDC to agree requirements for The Plan to go forward to Regulation 15 submission and removal SA DPD site.
- 4.53 31<sup>st</sup> August 2018** Regulation 15 submission of The Plan to CDC. September 2018 CDC acknowledged receipt by e-mail. October CDC advised of delays due to staff shortages and recent case law. Report to Parish Council meetings and minuted.
- 4.54 January 2019** CDC adopted SA DPD as part of local plan to include the site allocation for this Parish at Land to the North of Little Springfield Farm. Reported to PC meeting. March 2019 the Parish Council resolved to retain housing Policy H1.
- 4.55 26<sup>th</sup> March 2019** CDC confirm by e-mail they did not accept the Regulation 15 Plan submission. They required an update to the SEA to reflect the cumulative impact of two sites going forward in The Plan. They also required an amendment to The Plan to reflect changes to the NPPF (February 2019), and HRA screening matrix, and appropriate assessment statement to reflect ECJ requirements to be prepared by CDC. The Parish Council was to update and re-submit The Plan under Regulation 15 with supporting documents.
- 4.56 March - June 2019** Through Parish Council meetings open to the public, and the Parish Council Annual Assembly in March, April, May and June, Councillors and Parishioners were advised of the changes to The Plan. The update was advertised on Parish Council notice boards and the Neighbourhood Plan website. The Parish Council resolved to ratify changes to the Introduction of The Plan, acknowledging that the Parish housing allocation would be made through the Local Plan but that Policy H1 would be retained to ensure that any future development which may come forward on this sensitive site is specifically managed. The Parish Council has had due regard to the Health Check Inspector's report on the matter, and the evidence base for the site detailing its sustainability and ability to meet the Parish identified housing need.
- 4.57** Following the resolution by Parish Council on 17<sup>th</sup> July 2019 and submission of the NP at Regulation 15, CDC have requested amendments to Policy EH2, EH3 and EH5 to reflect the HRA Screening Matrix and Appropriate

Assessment Statement, and further addendum to the SEA. The appropriate amendments were ratified by the Parish Council on 17<sup>th</sup> September 2019, and the SEA updated by AECOM.

## 5. Summary Table of the Consultation and Outcome

Attached as [Appendix C – Consultation Statement Table](#)

## 6. Consultation: Main Issues and Concerns Raised

### Site Selection

- 6.1 The main issue and concern arising from the production of the Neighbourhood Plan was the selection of a site for the housing allocation (as determined by the local planning authority, CDC). The selection of a site has proved controversial, but this is probably not unusual in plan policy making. The site selection process has become lengthy and complex, and this has required a detailed explanation to residents, which the Parish Council has undertaken through specific consultation events, the dedicated website, posting on Parish Council notice boards, and via its regular parish council meetings.
- 6.2 Although we have only been allocated 10 houses in this small parish, the site selection has become complex because of the unusual settlement hierarchy, local plan planning policies and changes to the NPPF. In addition, the matter was made further complex by specific landowners wishing to promote their own sites, and CDC proposing to allocate a site through their own site assessment DPD document, in conflict with the site selection process of the emerging NP. The CDC preferred site option was considered by Locality appointed consultants AECOM, to be a site which would be unlikely to meet the national planning policy framework guidance on sustainability.
- 6.3 In summary, the Site Selection issue arises from the following:
- i) The parish has two main settlements, Plaistow and Ifold, within the neighbourhood plan area, one settlement with a settlement boundary and very limited facilities, and the other historic settlement with no settlement boundary, i.e. located in the countryside, but with a reasonable level of village facilities (including a primary school, a shop, a church, a public recreational area, village hall, tennis court, football ground, cricket ground, outdoor all-weather games area, and a public house).
  - ii) The settlement of Ifold had a settlement boundary introduced in 1990, and in which there is a presumption in favour of development. Because the settlement is low density with single detached dwellings in large gardens, this has resulted in continual unplanned windfall development, with no additional infrastructure provision. In the 28 years of the settlement boundary, Ifold has grown from 320 houses to over 470 homes, an increase of approximately 48%. The windfall development has been 5 or fewer houses and so the cumulative impact has not been recognised by The Planning authority and no additional infrastructure provision has been made. No site was available within the settlement boundary, to take the housing allocation of about 10 houses. Further, the settlement is accessed by private roads (many of them bridleways) with an annual residents road charge, and this would be unlikely to be acceptable to a housing association managing affordable houses.
  - iii) Plaistow settlement is located in the countryside, where Local Plan countryside policies apply. In the same period of time, from 1990, there has been two planned developments of housing association houses providing 18 affordable homes. There has been little market housing development with only two additional new houses in the same timeframe and the conversion of one public house to a residence.
  - iv) CDC Local Plan designates the two settlements of Plaistow and Ifold as one service village. A service village is defined in The Plan as villages that either provide a reasonable range of basic services to meet the everyday needs of local residents or villages that provide fewer of these facilities but that have **reasonable access** to them in nearby settlements. The distance between Ifold and Plaistow is 2.4 km along a road which has the national speed limit of 60 mph, and is a narrow country lane without footpath or street lighting. The distance is such that residents in Ifold are unlikely to walk to Plaistow and certainly not along Plaistow Road, which is unsafe. (As confirmed by WSCC education authority who provide a free school bus to Ifold school children, for reasons of safety) Therefore, to reasonably access services in Plaistow from Ifold it is necessary to drive by car or use a taxi service as the local bus service is poor. This may result in residents driving to Loxwood also 2.4km distance, where there is the doctors' surgery, a daily post office service, shop, butcher and hairdresser.
  - v) The National Planning Policy Framework (NPPF) requires that new development meets the sustainability criteria - social, economic and environmental. The NPPF must be set against not only the neighbourhood plan but the specific policy relating to the selection of a housing development site.

- vi) The presence of a brownfield site has added further complexity in determining a site to meet the Parish housing allocation. Little Springfield Farm - brownfield site, has been determined as obsolete for its former use. But it still has an inappropriate use class of B2 and B8, in primarily a residential and countryside location with poor road access. A planning application for residential development of this site for 3 houses was refused by the local authority and also dismissed at Appeal. Part of the grounds for refusal was the lack of sustainability. This site however is relatively close to the Ifold settlement and only 100 yards away from the site which the District Council has selected in its SA DPD document. The parish residents had expressed a desire to use brownfield sites before greenfield and therefore it was proposed, initially, to use this site to meet part of the Parish housing allocation. This would then have the benefit of changing the inappropriate use class.
  - vii) Further, Foxbridge Golf Course and club house had struggled to be financially viable and a planning application for residential development of part of the site came forward during the period of neighbourhood plan evidence gathering and drafting. Some residents were keen to see part of the golf course allocated for housing development with the possible benefit of saving the remainder of the golf course for members to play golf and possibly allowing the re-opening of Ifold Stores (in the same ownership as the golf course) The site has been considered through the NP process and discounted due to lack of sustainability. A planning application was submitted in October 2017 for 10 units which was refused by the District Council in January 2018, (post-Regulation 14 consultation) as it failed to meet Local plan policy. An Appeal was dismissed by The Planning Inspectorate in April 2019.
  - viii) CDC have continued to proceed with the SA DPD allocation document, which has been examined for soundness by The Planning Inspector in September 2017 and the final outcome was given in September 2018. CDC refused to remove the DPD site in this parish, maintaining that it meets their local plan policy as it adjoins the settlement boundary of Ifold, although across the Plaistow Road, a busy road separating it from the Ifold settlement boundary. Also, Ifold is designated as one service village with Plaistow. The Parish Council and Steering Group did consider this site, but it did not fare as well as other sites in Plaistow, which have better access to services ([see Site Assessment](#)). it was also the least preferred by local residents in the survey questionnaire in 2017 ([see Survey Report](#)).
- The Parish Council and Steering group in Summer 2016 obtained grant assistance from Locality and appointed AECOM to assess the work to date on The Plan, which included our site assessments. The AECOM assessment made a number of recommendations and stated that the CDC SA DPD site, Land to the North of Little Springfield Farm was less well served for services than the sites that the Parish Council were considering in Plaistow, and that a site in Plaistow would better meet the NPPF sustainability criteria. They also determined that the Brownfield site at Little Springfield Farm could not be taken forward for residential development due to its lack of sustainability. Further, they determined that additional consultation with residents was required in respect to the sites considered and this was undertaken in September 2016.
- The Parish Council has made representation to CDC regarding the allocation of the SA DPD site North of Little Springfield Farm, both at consultation periods and at the Examination when the soundness of the allocation was challenged. The Parish Council made further representation during the consultation ending 15 March 2018. In September 2018 the Examining Inspector determined that the Neighbourhood Plan was insufficiently advanced to make the housing allocation, and that the SA DPD site North of Little Springfield Farm should be allocated. CDC ratified the SA DPD as part of the Local Plan in January 2019.
- ix) Additionally, the District Council partway through the assessment of sites determined that sites of between 6 and 10 units could require that affordable housing be built on the site and that alternative commuted payments could be made. Therefore, if the parish wanted affordable housing to be built within the parish only a site of 10+ units would achieve this goal. The parish could therefore no longer split its housing allocation over two sites as originally proposed in May 2016.
  - x) Although three potential sites were identified in Plaistow village, two were discounted after further investigations revealed access difficulties. This has resulted in the third site Land opposite the Village Green becoming our policy allocation.

- 6.4** It has been challenging to convey the complexity of planning policy and how it impacts on our choice of residential site to our parishioners, who have found the process and the matter of sustainable development a hard concept to grasp. This has been further confused by CDC's position in not withdrawing from the site allocation through their own DPD and to allow residents to make a decision through the neighbourhood plan process. The majority of the concerns raised by parishioners relate to matters pertaining to the residential site allocation. The Parish Council and Steering Group has worked tirelessly to convey this detailed and difficult process through the various exhibitions, presentations and Parish Council meetings and issuing of updates and questions and answers.

The allocation of the site through the Local Plan in January 2019 has caused the Parish Council to consider whether to withdraw H1 Policy from The Plan in line with the original intention not to over deliver on housing numbers, should the CDC SA DPD site go forward. Having considered the Health Check Inspectors report, other than to avoid over allocation, the PC had no substantive grounds to remove Policy H1, and bearing in mind the sensitive nature of the site, the PC resolved it was preferable to retain Policy H1 to ensure that the site is well managed, through its 12 point criteria, should it come forward for development in the future and that development meets the needs of the Parish. The challenge in addressing the residents' concerns over the site allocation and sustainable development has taken a huge amount of time and resources.

### **Local Green Space**

- 6.5** The other main issue has been determining and presenting the Local Green Space (LGS). In general, the allocation of LGS has been welcomed by parishioners and reflects their responses at consultation. The majority of landowners have not objected or raised issues. But two specific landowners have challenged the LGS designation of their land at Regulation 14. The local landowner for the Nell Ball LGS has discussed his allocation at length with the Chair of the Parish Council at the 2 July display. The Parish Council is confident that the allocations meet the criteria laid down by the NPPF and leave the matter to an examiner to determine.

### **Other Issues and Concerns**

- 6.6** From the Regulation 14 comments by local residents it can be seen that the principal issue is the site location and concerns relating to this matter. All comments have been responded to and The Plan amended, where appropriate, and this is all documented in the Regulation 14 table of comments and responses. Other issues and concerns have been about infrastructure, foul and surface water drainage, poor provision of footpaths and cycle ways, protection of non-designated heritage assets and traffic calming. These again have been responded to in the [Regulation 14 comments](#) and action taken to amend The Plan where necessary.

### **Statutory Consultation**

- 6.7** The statutory consultees have, on the whole, not raised any significant concerns or issues and their comments have prompted helpful improvements to The Plan which have been attended to in the final draft. However, CDC as lead authority (and SDNP) did object to the Brownfield Policy EE4, and although they have only raised minor issues with the H1 Policy housing site allocation relating to wording, there remains a conflict between the NP housing allocation and CDC SA DPD site allocation. CDC also raised issues regarding the SEA coverage.
- 6.8** Following Regulation 14, a further meeting was held in November 2018 with CDC relating to the housing site allocation in The Plan, Policy H1, the brownfield site Policy EE4, and the SEA. Following the meeting, Policy EE4 wording was amended in order to ensure viability of alternative uses is addressed. The SEA has also been sent back for clarification on the issues CDC have raised concerning site coverage and the brownfield site.
- 6.9** With regard to the housing allocation in the NP, the fundamental difference in opinion between CDC Officers and the Parish Council revolves around the matter of sustainability. Whether it is preferable to allocate a housing site with good access to facilities and services, but which is located in an historic village adjacent to a Conservation Area and close to Grade II Listed building or to allocate a site with limited access to services and facilities outside but adjacent to a Settlement Boundary and with no impact on the historic environment. Regarding the historic environment the Regulation 14 comments of Historic England (HE) must be considered. HE has determined that there would not be significant impact from Policy H1. CDC has not raised concern over adverse impact on the historic environment in their Regulation 14 comments. Policy H1 has been carefully worded to reflect the sensitivity of the site and comments raised by parishioners.

**6.10** CDC have relied on the Service Village designation in the Local Plan, where Plaistow and Ifold are designated one Service Village. However, such designation is based on 'reasonable access' to basic facilities. The Parish Council does not consider 2.4km distance from the SA DPD site at Little Springfield Farm, over a road with no footpath and 40 and 60MPH speed limits, and which has been determined by the local highway authority as too dangerous for school children and their parents to walk, as reasonable access to services. The service village designation is currently the subject of review through the Local Plan. The Parish Council considers that the site allocated in Policy H1 best meets the identified parish housing need of 1, 2 and 3 bedroom units and housing suitable for the elderly. It would allow the opportunity to walk to village services and facilities and socially interact, both for young and old alike, with positive implications for the future of these vital services and facilities.

<b>Policy Area</b>	<b>Summary of Key Issues / Concerns</b>	<b>How the issues have been resolved</b>
Site allocation to meet Housing Allocation	Using brownfield sites before greenfield.	The brownfield site at Little Springfield Farm was originally selected but has been discounted following professional planning advice. There is no other sustainable brownfield site in the parish. This information has been conveyed to parishioners at meetings in questions and answers, and at Regulation 14.
Site allocation to meet Housing Allocation	Proximity to Conservation Area and Grade II Listed properties.	Drafting of the wording to Policy H1. Advice of Historic England. HER research.
Site allocation to meet Housing Allocation	Use of a greenfield site in Plaistow.	There are no sites within a settlement boundary. All sites considered are greenfield in the countryside. Plaistow village has reasonable access to facilities and services This information has been conveyed to parishioners at meetings in exhibitions, in questions and answers and at Regulation 14.
Site allocation to meet Housing Allocation	Potential highway issues.	Advice of WSCC LHA sought and consultee response indicated no adverse impact. This information has been conveyed to parishioners at meetings, in questions and answers and at Regulation 14.
Site allocation to meet Housing Allocation	Adverse Environmental impact.	Desk top evaluation by Steering committee and EA consultee response, showed no adverse impact. This information has been conveyed to parishioners at Regulation 14
Site allocation to meet Housing Allocation	Sustainability and car usage in the Parish.	Reference to NPPF reduce car usage. This information has been conveyed to parishioners at meetings, in questions and answers and at Regulation 14.
Site allocation to meet Housing Allocation	Extending Ifold Settlement Boundary (ISB) in order to take housing allocation.	Residents' consultation indicated that ISB should not be extended into the countryside. Ifold still remains less sustainable in planning policy terms than Plaistow. Planning consultants advise no mandate to extend the ISB. This information has been conveyed to parishioners at meetings, in questions and answers and at Regulation 14. Addressed by housing policy H2.
Site allocation to meet Housing Allocation	Extending Ifold Settlement Boundary (ISB) in order to take a larger housing allocation than 10 to fund additional facilities and services in Ifold.	Specific matter consulted on in 2016 Questionnaire, not supported by residents. Planning consultants advise no mandate to take forward. This information has been conveyed to parishioners at meetings, in questions and answers and at Regulation 14. Addressed by housing policy H2.
Site allocation to meet Housing Allocation	Impact for infrastructure provision particularly foul drainage and surface water issues, which impact Ifold settlement.	Information presented at public exhibition and meetings. Housing Policy and AIMS in draft plan.
Housing	Increased density in Ifold, loss of character and loss of trees.	Addressed by housing policies H2 and H3.



## **7. Health Check**

- 7.1** A [Health Check](#) was awarded to the Parish Council by Locality and was undertaken by Catherine Loveday BSc (Hons) MSc MRTPI (Intelligent Plans and Examinations).
- 7.2** The [Health Check Report](#) is summarised as follows:
- a) The Examiner was satisfied with the level of consultation that had taken place with the general public.
  - b) Minor amendments were recommended, and The Plan has been amended accordingly.
  - c) The Examiner raised the issue regarding the site allocation and the relationship with the CDC Site Allocations DPD site, which has been resolved with acknowledgement of the housing allocation numbers by CDC, and the retention of Policy H1.
- 7.3** The Parish Council maintains that the site proposed in the Neighbourhood Plan is the community's preferred site, and is more sustainable than the site that is allocated by CDC in their SA DPD.

## **8. Conclusion**

- 8.1** The Neighbourhood Plan has been subject to extensive consultation over five years and has benefited from wide community support and engagement.
- 8.2** The Neighbourhood Plan has been a standing item on the Parish Council agenda since work began, and regular updates on progress have been given. Members of the public have been able to attend and raise any issues and questions and obtain answers from the Parish Council. Key resolutions have been advised to parishioners through minutes, reports and updates on the website and social media and Parish Council notice boards.
- 8.3** The Parish Council website has also been used and a dedicated webpage has been developed and improved to ensure that parishioners, stakeholders and consultees can view all documents and information held. In addition, many public events have been held in the Parish over the whole NP preparation period and these have always been manned by members of the Steering group and parish councillors giving parishioners the opportunity to discuss any issues and have questions answered.
- 8.4** The Neighbourhood Plan has been constructed using the large amount of consultation feedback from residents and professional bodies. Levels of public engagement have been generally good at about 30% of the population attending events/ completing feedback forms/questionnaires. Engagement with landowners has taken place when the details of any land interests have been known. Whilst it has not been possible to facilitate all resident views the Parish Council is satisfied that The Plan represents a balance between local requirements and the formal planning policy context to which The Plan must comply.
- 8.5** The pre-submission consultation exercise has been a useful phase of consultation helping to understand the residents' level of support and detailed concerns regarding policy. The response from the formal consultees has been generally positive and has enabled us to revisit some aspects of The Plan or policies to ensure that wording is clear and the Policies comply.
- 8.6** The Plan appears to be broadly supported in the community despite difficulties with site selection. The intention is to ensure that the final version of the NP addresses residents' concerns, particularly those in Plaistow where the site is located, with a very carefully drawn housing policy. It is considered that The Plan will receive majority support at the referendum.
- 8.7** The Parish Council wish to thank to all the people who have worked so hard and given so much time voluntarily to deliver The Plan, and ensured that The Plan has been publicised to as many residents and stakeholders of the Parish as possible. The residents are thanked for their continued involvement and contribution to the development of the Neighbourhood Plan.

## 9. Appendices

[Appendix A – Regulation 14 Statutory Consultees](#)

[Appendix B – Regulation 14 Consultees Comments](#)

[Appendix C – Consultation Statement Table](#)

[Appendix D - Regulation 14 General Public Representations](#) with Parish Council responses.

Throughout this document links are available to digital copies of the following, located on the Neighbourhood Plan website and the Parish Council website:

- Links to questionnaires and surveys.
- Details of all comments received and how they have been addressed.
- Links to minutes of meetings at which consultation responses and amendments to be made to The Plan, were discussed.

All evidence is publicly available on the dedicated [Neighbourhood Plan website](#), and the [Parish Council website](#).