



## Representation Form

### Plaistow and Ifold Parish Neighbourhood Plan

#### The Neighbourhood Planning (General) Regulations 2012 - Regulation 16

Plaistow and Ifold Parish Council has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Plaistow and Ifold Parish Neighbourhood Plan and supporting documents are available to view on Chichester District Council's website:

<http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00 pm on 30 April 2020.**

#### There are a number of ways to make your comments:

- Complete this form on your computer and email it to:  
[neighbourhoodplanning@chichester.gov.uk](mailto:neighbourhoodplanning@chichester.gov.uk)
- Print this form and post it to us at: **Neighbourhood Planning East Pallant House 1 East Pallant Chichester PO19 1TY**

#### Use of your personal data

All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

#### How to use this form

Please complete Part A in full in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying to which paragraph your comment relates by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
Full Name	Christine Gibson-Pierce
Address	
Postcode	
Telephone	
Email	
Organisation (if applicable)	
Position (if applicable)	
Date	30 APRIL 2020

## PART B

To which part of the document does your representation relate?

Paragraph Number	1.9	Policy Reference:	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

I OBJECT to Chichester District Council's use of the Plaistow–Ifold 'Service Village' concept in this Neighbourhood Plan - and also in the Chichester Local Plan Key Policies (CLPKP) - which defines Plaistow and Ifold as a combined service village: Plaistow-Ifold.

CDC planning policies allow unlimited '*windfall*' housing to be built within the Ifold Settlement Boundary. This is despite Plaistow village having the most services and facilities: a Primary School; village Green (with outdoor childrens' playground), Plaistow Stores; Church; Pub; Football Club; Winterton Hall (with weekly post-office services); multi-use outdoor games area; a preschool (with its own dedicated outdoor play area); and WSCC Highways 'adopted' roads.

Ifold has a scout hut and a hall (both run by volunteers). The Ifold shop (only selling basic staples), does not make Ifold as sustainable as Plaistow, and that is as according to the National Planning Policy Framework (NPPF). Unlimited windfall has altered the area character damaging its rural openness which Plaistow village has perplexingly been allowed to retain despite it being the most sustainable area in the Parish to locate housing. The character of Ifold must be managed and the burden of new housing be shared across the Parish.

Plaistow village and Ifold (including Ifold Estate which is entirely within the Settlement Boundary and has private roads and Public Rights of Way, with many roads designated as bridleways) are two very separate settlements. Plaistow village is more sustainable in NPPF terms than Ifold, so to apply the service village concept in this example is incongruous with the NPPF.

The NPPF states that 'sustainable development' should lessen the use of motor vehicles. Plaistow and Ifold are several kilometres apart, and it is not reasonable to expect Ifold residents to walk on the unsafe, and winding Plaistow Road with its 60mph national speed limit, and which has no pavements or street lighting, to access the many services and facilities located in Plaistow village, including its primary school. Ifold school children are provided a school bus by West Sussex County Council to transport them to and from the primary school in Plaistow village, as the road is deemed too unsafe for school children to walk to the Plaistow primary school.

**What improvements or modifications would you suggest?**

Clearly state in the Plaistow and Ifold Parish Neighbourhood Plan that the Chichester Local Plan Key Policies (CLPKP) service village concept of Plaistow-Ifold, which defines Plaistow and Ifold as a combined service village is not applicable.

Remove the service village concept of Plaistow-Ifold from the Chichester Local Plan Key Policies (CLPKP) which defines Plaistow and Ifold as a combined service village.

Please ensure the Examiner is aware of this unreasonable service-village concept, and the reasons noted above for why it is inappropriate for the Plaistow and Ifold Neighbourhood Plan.

***N.B. I request to be notified of the local planning authority's decision under Regulation 19 in relation to the neighbourhood development plan.***

Paragraph Number		Policy Reference:	3.6
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

In Public Consultations and a Parish-wide survey conducted by the Parish Council, they asked landowners a question regarding the existing Settlement Boundary and extension to it, however they did not address this same question for Plaistow.

Plaistow village has the most services and facilities: a Primary School; village Green (with outdoor childrens' playground), Plaistow Stores; Church; Pub; Football Club; Winterton Hall (with weekly post-office services); multi-use outdoor games area; a preschool (with its own dedicated outdoor play area); and WSCC Highways 'adopted' roads. Therefore, Plaistow village must have a defined Settlement Boundary.

**What improvements or modifications would you suggest?**

Insert new a Para regarding Plaistow Settlement Boundary.

The Local Planning Authority will define a Settlement Boundary around the village of Plaistow as it has done for Ifold.

Paragraph Number	6.13, 6.14, 6.18 – 6.20	Policy Reference:	H1
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

I have suggested amendments.

I SUPPORT the Plaistow village housing development site identified in the Neighbourhood Plan Policy H1, which is opposite Plaistow village green, and within walking distance to the many Plaistow village services and facilities.

The site identified in Policy H1 - Site proposed for Housing Development: Land Opposite the Village Green in Plaistow, has been identified by the Parish Council as viable to meet the parish's identified housing need of smaller units, and housing suitable for the elderly.

The identification of the site was supported by several independent assessments:

- (1) a Site Options and Assessment (awarded to the Parish by Locality) and completed by AECOM on their behalf (15 August 2016).
- (2) an Health Check 'Examination' (awarded to the parish by Locality) and completed by Intelligent Plans – Inspector Catherine Loveday BSc (Hons) MSc MRTPI (June 2018).

Any housing on this Plaistow site is more sustainably located than the site CDC have assigned in their Site Allocations Development Plan Document (SADPD) which lies outside the Ifold Settlement Boundary.

**What improvements or modifications would you suggest?**

To include a new para in the Policy H1 – Objectives:

- Amend Para 6.13 to be:

To meet the CLPKP and NPPF requirement for sustainable development with commensurate infrastructure, and to have regard to the range of housing need and demand identified by the *Neighbourhood Plan Household Survey and Housing Needs Assessment* and, where relevant, other local assessments;

- Amend Para 6.14 in the Policy H1 – Objectives to be:

To promote affordable housing, specialist housing for the elderly, and housing to meet local needs, and with regard to the need to deliver a range of unit types at different price points;

- Include a new para in the Policy H1 – Justification:

Well-designed one- and two- bedroom units can attract those residents wishing to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.

Paragraph Number		Policy Reference:	H2
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

Due to CDC planning policies there is an increase in housing density imposed on Ifold, and specifically Ifold Estate, which is entirely within the Ifold settlement boundary and has unlimited 'windfall' housing as defined by the District Council. This results in the lighting of bonfires causing significant nuisance to houses in close proximity to one another and danger to visibility on the narrow private roads. There are no laws against having a bonfire, but there are laws for the nuisance they can cause.

I have suggested amendments.

**What improvements or modifications would you suggest?**

Include an AIM under Policy H2:

**AIM – GARDEN BONFIRES:**

There are no laws against having a bonfire, but there are laws for the nuisance they can cause.

**Burning Domestic Waste**

Residents cannot get rid of household waste if it will cause pollution or harm people's health. This includes burning it.

Residents are encouraged to get rid of household or garden waste by composting or recycling it. Contact Chichester District Council to find out how to dispose of garden waste and about recycling in your area.

Residents could be fined if they light a fire and allow the smoke to drift across the road and become a danger to traffic. Chichester District Council can issue an 'abatement notice' if a neighbour's bonfire is causing a nuisance. A bonfire must happen frequently to be considered a nuisance.

Paragraph Number	Conformity Reference	Policy Reference:	Ci1 – Reducing and Avoiding Flood Risk
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

The policy does not make reference to the Land Drainage Act 1991.

I have suggested amendments.

**What improvements or modifications would you suggest?**

Insert new conformity reference:

- The Land Drainage Act 1991 – which sets out the legal responsibilities of Riparian Ownership.

Paragraph Number		Policy Reference:	Ci1 – Reducing and Avoiding Flood Risk
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

The policy does not make mention to Riparian Ownership which defines the legal responsibilities of landowners as per the Land Drainage Act 1991.

**What improvements or modifications would you suggest?**

- Insert new text to Para 5.18 as follows:

Landowners are reminded that they are considered a *Riparian Owner* by law if they own land which is adjacent to a watercourse or land which has a *watercourse* running through or underneath it.

The *Legal Responsibilities* of Riparian Ownership are that you are responsible for the maintenance and upkeep of the watercourses to ensure they do not become a flood risk to people, or property. Common problems affecting watercourses are:

- Allowing silt to build up, which can reduce the capacity of, or block, watercourses.
  - Failing to keep vegetation growth under control.
  - Disposal or storage of garden or domestic rubbish or waste on the banks of watercourses.
  - Failing to clear the entrances to piped watercourses.
  - Failing to obtain consent for any building, planting or alterations within eight (8) metres of the bank.
- Existing Para 5.18 will then be renumbered to be 5.19.

Paragraph Number	After 5.18	Policy Reference:	Ci1 – Reducing and Avoiding Flood Risk
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

The policy does not make mention of Riparian Ownership which defines the legal responsibilities of residents and landowners.

**What improvements or modifications would you suggest?**

Insert in Policy Ci 1 – Reducing and avoiding flood risk

If landowners are a Riparian Owners, they are responsible for the maintenance and upkeep of the watercourses to ensure they do not become a flood risk to people, or property. The Land Drainage Act 1991 sets out the legal responsibilities of Riparian Owners.



Paragraph Number		Policy Reference:	EE4 Brownfield Site
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**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support            Support with modifications            Oppose            Have Comments     

**Please give details of your reasons for support/opposition, or make other comments here:**

This policy does not provide sufficient emphasis regarding the Use Class B1(c) light industrial. Case in point, the site landowner's latest planning application (Reference 19/02182/FUL) seems to have allocated a bedroom but not provided specific conditions for the use as B1(c) light industrial. The landowner in this same planning application has prescribed 8 units on the site which is far greater than previous planning applications.

In discussions the Parish Council / Steering Group had with CDC planning officers it was agreed that it would be best for Policy EE4 to be evaluated during Examination of The Plan. An experience Inspector would likely offer further enhancement to this policy.

**What improvements or modifications would you suggest?**

I consider that it still be the appropriate course of action to have an independent Examiner review this policy. This site is next to Ancient Woodland, badger setts, a watercourse and other wildlife habitats. Whilst I believe the brownfield site should be decommissioned and a change of use be implemented, that is converted to part residential use, the maximum number of units permitted to be built on this site needs to be specified to avoid over-development of the site to the detriment of its sensitive location.

Clearer emphasis is needed in the policy itself regarding the Use Class B1(c) light industrial requirements for each and every unit approved for development.