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.

**Representation Form**

**Plaistow and Ifold Parish Neighbourhood Plan**

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

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.](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
* 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.

|  |  |
| --- | --- |
| **PART A** | **Your Details** |
| **Full Name** | Nicholas Taylor |
| **Address** | Mission Hall The Street PlaistowWest Sussex |
| **Postcode** | RH14 0NS |

|  |  |
| --- | --- |
| **Telephone** |  |
| **Email** | nicholastaylor@msn.com |
| **Organisation (if applicable)** | NB: this submission is made in a private capacity and NOT in my capacity as a Plaistow & Ifold Parish Councillor. |
| **Position (if applicable)** |  |
| **Date** | 28/04/2020 |

# PART B

## To which part of the document does your representation relate?

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | 1.8, 2.32, 7.3 | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications  Oppose

Have Comments

(Continue on separate sheet if necessary)

The statement that Ifold has “very limited’ facilities is incorrect. There is also a shop: the one mentioned in 2.32 & 7.3 has already been reinstated. Furthermore, Ifold and Plaistow are defined as a single service village so, by extension, all the facilities available in Plaistow are available to residents of Ifold too.

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

(Continue on separate sheet if necessary)

Delete the words ‘and very limited facilities (a hall and a Scout & Girl Guide Hut)’ from 1.8. Delete the words ‘and reinstate former A1 shop premises in Ifold’ from 2.32 & 7.3.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | 1.9-1.11 | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications

Oppose  Have Comments

(Continue on separate sheet if necessary)

The statement that the ‘notional link of the two settlements being classified as a combined ‘service village’ is, in reality *‘not reasonable’* is subjective and not supported by residents’ behaviours.

Residents of both settlements regularly travel between the two, particularly since many of the pupils at the school in Plaistow come from Ifold (a route served by a school bus). The distance between them is cyclable and walkable but, as noted elsewhere in the NP, most households have a car.

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

(Continue on separate sheet if necessary)

Delete from ‘There is no reasonable …’ in 1.9 to the end of 1.11 and replace with ‘Plaistow and Ifold are defined as a combined service village’.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

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| --- | --- | --- | --- |
| Paragraph Number | 1.13 | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications

Oppose  Have Comments

(Continue on separate sheet if necessary)

Given the statement made in 1.12, acknowledging that the Land to the North of Little Springfield Farm has already been identified by CDC in its CLPKP as being suitable for development and able to deliver the full housing allocation of 10 units, there is no need for the NP to identify a further site. Paragraphs 1.13 & 1.14 should therefore be deleted.

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

(Continue on separate sheet if necessary)

Delete 1.13 & 1.14.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | 2.25, 6.3 | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications

Oppose  Have Comments

(Continue on separate sheet if necessary)

No justification is given for Objective 2.25 / 6.3 so it should be deleted.

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

(Continue on separate sheet if necessary)

Delete 2.25 & 6.3. Also 2.6.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | H1 |

**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:** Given CDC’s position as outlined in paragraph 1.12, there is no need to identify a further site for development and so Policy H1 is obsolete.

The Land Opposite the Green is in any case completely inappropriate for development.

* The site is in an elevated position adjacent to and overlooking the conservation area (Map 4), National Trust land (para 3.6) and designated Local Green Space (LGSP1). Several listed buildings (nos 3, 4, 12,16, 23, 24, 48, 63 & 75 in Appendix 2) and non-designated heritage assets (The Dairy & Edmunds Hill Cottage – see Appendix 3) will be negatively impacted. The site selection is in contravention of Objectives 2.10, 2.14, 4.1 & 4.5 and in contravention of Policy EH1 (specifically objective 4.12) and Policy EH4 (objectives 1.25 & 4.26)
* It is a greenfield site, while a brownfield site is available, in contravention of Objective 2.15.
* Development of the site would be incompatible with the ‘vision’ set out on p5 of ‘respecting the character, natural boundaries and vistas in this special part of West Sussex’.
* Because of the layout of the sewer system (5.12) further development in Plaistow would also risk exacerbating the sewerage problems suffered in Ifold (5.13).

By contrast, CDC’s selection of Land to the North of Little Springfield Farm as a suitable site to meet the required housing allocation is entirely compatible with Objectives 2.15 & 2.23 and Policy EE4.

(Continue on separate sheet if necessary)

Delete Policy H1

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | H2 |

**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:** Policy H2 supports ‘proposals for redevelopment of existing plots, replacement dwellings and extensions to existing dwellings within the Settlement Boundary of Ifold’ despite identifying in 6.24 that this approach has ‘inevitably led to pressure for infill and back-land development on original plots in recent years [which] has resulted in a gradual erosion of the character of the area’. Policy H2 does not meet its stated intention of ‘seeking to redress and manage’ that erosion (6.24) and risks exacerbating the problem of an overloaded sewer system identified at 5.13.

.

(Continue on separate sheet if necessary)

Policy H2 should be deleted. As an alternative, CDC should consider extending the area of the Ifold Settlement Boundary. This would allow expansion of the settlement without contributing further to the ‘erosion of the character of the area’ (6.24) and could be managed in such a way as to fund solutions (see para 5.15) to the sewerage and ground water flooding problems identified in

5.12 & 5.13. More broadly, the planned – rather than ad hoc – expansion of Ifold would help redress the historical issues set out in Paragraph 6.3 (ii) of the Statement of Consultation.

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | EH1 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications  Oppose

Have Comments

(Continue on separate sheet if necessary)

The stated intentions of Policy EH1 are laudable but will not be fulfilled by ‘encouraging’ development of any kind ‘within the boundary of, or within the setting of Heritage Assets’. The policy should be reworded to set out a presumption against such development.

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

(Continue on separate sheet if necessary)

The policy should be amended along these lines:

‘Development proposals within the boundary of, or within the setting of Heritage Assets (both designated and non-designated) will be ~~encouraged~~ resisted in the Parish ~~where~~ unless it ~~is~~ can be demonstrated that such development will not adversely impact …’ etc.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

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| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | EH3, EH4, EH5, EH6 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications

Oppose

Have Comments

(Continue on separate sheet if necessary)

These policies are important to protecting the character of the area.

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

(Continue on separate sheet if necessary)

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | Ci2 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications

Oppose

Have Comments

(Continue on separate sheet if necessary)

The provision of good internet connectivity is vital to the health of the rural economy. But more than that, as the Covid-19 lockdown demonstrates, it is vital for many other important aspects of everyday life (maintaining contact, home schooling etc.) as well.

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

(Continue on separate sheet if necessary)

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

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| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | H4 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications

Oppose

Have Comments

(Continue on separate sheet if necessary)

This policy will make an important contribution to maintaining the character of the area.

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

(Continue on separate sheet if necessary)

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

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| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | EE1, EE2, EE3, EE4 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications

Oppose

Have Comments

(Continue on separate sheet if necessary)

I believe that there will be increased demand for live-work spaces in the wake of Covid-19. These policies will make a positive contribution to the economic health of the Parish.

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

(Continue on separate sheet if necessary)

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | T1 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications

Oppose

Have Comments

(Continue on separate sheet if necessary)

With the high proportion of car ownership unlikely to change, keeping our roads safe and our grass verges (many of which are owned by the National Trust) undamaged will become more and more important.

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

(Continue on separate sheet if necessary)

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | Statement of Consultation | Policy Reference: |  |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support

Support with modifications

Oppose  Have Comments

(Continue on separate sheet if necessary)

The Statement of Consultation mixes factual statements with statements that are subjective and self-serving. The Statement correctly identifies (paragraph 6.1) that site selection has been controversial (as indeed have many aspects of the neighbourhood planning process). But claims that the reason for that controversy is that ‘parishioners… have found…the matter of sustainable development a hard concept to grasp’ (6.4) is insulting to those Plaistow residents who understand the concept perfectly and who fully support CDC’s alternative site selection (ratified as part of the Local Plan in January 2019). The statement also fails to explain why, despite the ratification of CDC’s site selection, ‘it was [still] preferable to retain Policy H1’.

In arguing (6.3 iv) that Ifold and Plaistow should not be viewed as one service village, the Statement fails to mention the significant amount of two-way traffic (by car, by bicycle, on foot and on the school bus) that takes place daily between the two, or the fact that a 30mph speed limit was planned at the time that the statement was written and has since been introduced.

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

(Continue on separate sheet if necessary)

The inspector may wish to speak to a representative body such as the Plaistow Village Trust to ascertain whether residents of Plaistow feel that all parts of the community were equally involved in the neighbourhood planning process and whether the consultation process was conducted as thoroughly and even-handedly as the Statement suggests.

The inspector may also want to consider the summary way in which the majority of comments submitted as part of the Reg 14 consultation (other than, notably, comments submitted by Ms Burrell and others closely connected with the NP steering group) were dismissed. Many Plaistow residents feel this is symptomatic of the lack of attention that they have been accorded throughout the neighbourhood planning process.

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

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.