



Design Planning and Economics

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PLAISTOW AND IFOLD  
PARISH COUNCIL

Submitted by  
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# Site Options and Assessment

## Plaistow and Ifold

August 2016

Final Report

# Plaistow and Ifold Site Options and Assessment

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### Acronyms used in the report

CDC	Chichester District Council
DPD	Development Plan Document
DPH	Dwellings per Hectare
NPPF	National Planning Policy Framework
PINP	Plaistow and Ifold Neighbourhood Plan
PIPC	Plaistow and Ifold Parish Council
SHLAA	Strategic Housing Land Availability Assessment

# 1 Executive Summary

AECOM has been commissioned to undertake an independent site assessment for the Plaistow and Ifold Neighbourhood Plan on behalf of Plaistow and Ifold Parish Council (PIPC). The work undertaken was agreed with PIPC and the Department for Communities and Local Government (DCLG) in July 2016 and carried out during July and August 2016.

The emerging Chichester District Council (CDC) Site Allocation document allocates sites for housing development across the District. CDC has stipulated a housing target of ten dwellings for Plaistow and Ifold, to be developed on land north of Little Springfield Farm. However, the parish council does not support development at this location and as such is seeking to allocate two alternative housing sites within the parish, alongside the possibility of back-up sites to contribute to the overall housing need for the parish.

The purpose of the site appraisal is therefore threefold;

- A review of the evidence and methodology underpinning the site assessment process carried out by the group and advice on any further steps that may be needed to ensure it is robust;
- To assess the results of the site assessment process so far to ensure they are justified and comply with local and national planning guidance; and
- To make recommendations on the most suitable sites to take forward for consideration in the neighbourhood plan, and the criteria/evidence that would underpin these recommendations.

This is to ensure that the site selection process will be robust enough to meet the Basic Conditions considered by the Independent Examiner, as well as any potential legal challenges by developers and other interested parties.

## Planning Policy

The Neighbourhood Plan must have regard to local and national planning policy, contained in the National Planning Policy Framework (NPPF)<sup>1</sup> and to Chichester District Council's Local Plan.

AECOM's independent assessment of the process is that a generally sound methodology resulted in broadly sound conclusions on six of the seven sites assessed. However, we consider that the conclusions on Little Springfield Farm<sup>2</sup> are flawed and would not as currently drafted meet the Basic Conditions of neighbourhood planning<sup>3</sup>, specifically:

- Basic Condition d), whereby the neighbourhood plan must contribute to the achievement of sustainable development and
- Basic Condition e), whereby the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area, in this particular case the Chichester Local Plan Policy 1: Presumption in Favour of Sustainable Development.

We therefore consider that the site assessment methodology could and should be strengthened in two key ways:

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> This site is a brownfield site in countryside close to Ifold and should not be confused with the separate site called 'Land North of Little Springfield Farm', currently allocated for development in the emerging Chichester Site Allocation DPD.

<sup>3</sup> Available online at <http://www.chichester.gov.uk/CHttpHandler.ashx?id=24759&p=0>

- Firstly, by naming and using the appeal decision at Little Springfield Farm as one of the main criteria against which all sites are assessed- this will then result in not only Little Springfield Farm itself but also the nearby Land North of Little Springfield Farm being assessed as less suitable for development; and
- Secondly, and linked to the first point, by recognising that the approach to sustainable development in the English planning system as set out in the NPPF and reiterated in both Chichester's adopted Local Plan and in the Little Springfield Farm appeal decision means that Plaistow is effectively the only settlement in the parish that could be considered suitable for new housing development. The NPPF's approach to sustainable development relates to the document as a whole, meaning that even though it supports the development of brownfield land (as at Little Springfield Farm) in principle, on balance, it would not support new residential development at Ifold due to its lack of services and facilities, as per the conclusions of the recent appeal decision. Recognition of this point would mean rethinking the current approach of allocating development equally to Plaistow and Ifold, which, though understandable from the point of view of equality, is not otherwise supported by the evidence and appears contrary to two of the Basic Conditions of neighbourhood planning. It would also enable local residents to understand that, though Little Springfield Farm may be considered sustainable in terms of brownfield land, this consideration is easily outweighed in the national planning system both as a result of its location away from the settlement boundary and by Ifold's overall lack of sustainability as a location for new growth.

As such, we recommend that instead, one or more sites are allocated at Plaistow, where new housing will be within walking distance of a primary school, a shop and a pub, with positive implications for the future of these three vital services. In practical terms, this is likely to be Land Adjacent to Todhurst and then the best performing of the other sites, which in AECOM's view, taking all relevant criteria into account, would be Land Adjacent to the Dairy and Edmund's Hill.

If it is considered that a reserve site is required in the event that the two best-performing sites do not come forward for development for any reason, Land Opposite the Green appears the most suitable in this regard.

The table overleaf summarises the review of the AECOM site assessment process and recommends which sites are suitable for housing and should be considered as residential site allocations.

The findings show that three of the seven sites are considered suitable for housing. It is for PIPC to now decide which of these suitable sites or combination of sites to put forward for allocation to meet the housing need identified for the parish and to contribute to the wider housing need of Chichester District.

Site No	Name	Size (hectares)	Current use	Suitable for housing	Indicative capacity (number of dwellings) <sup>4</sup>	Justification
1	Land Opposite the Green, Plaistow	1.35	Pasture	Yes	18 (at 15 dph, 90% of area developable)	Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Needs to be developed sensitively with regard to the Plaistow conservation area and nearby listed buildings (hence 15 dph). The openness and visual prominence of this site leads AECOM to conclude that, though suitable for residential development, it is only the third-best performing of the Plaistow sites. However, its size relative to the other sites offers the opportunity to develop this site alone. 90% developable area due to effectively no constraints within site boundary itself.
2	Land Adjacent to Todhurst, Plaistow	1.36 (0.47) <sup>5</sup>	Rough woodland, rough grass, scrubland	Yes	8 (at 20 dph, 90% of area developable)	Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Proposal to retain eastern half of site as green space, ideally with no loss of trees, renders the site far more suitable for development and enables it to perform better on technical criteria than Land opposite The Green. A condition of development could be like-for-like replacement of lost trees within the green space retained. Twenty dph used to reflect less sensitive location for development, and 90% developable area due to small size of site but also potential to retain some trees.
3	Shortlands, Durfold Wood	2.4	Residence with private garden	No	-	Site is not in Plaistow. The approach to sustainable development in the English planning system as set out in the NPPF and reiterated in both Chichester's adopted Local Plan and in the Little Springfield Farm appeal decision means that Plaistow is effectively the only settlement in the parish that could be considered suitable for new housing development. Any other approach would likely be contrary to two of the Basic Conditions of neighbourhood planning.

<sup>4</sup> As per considerations in section 5.2 above.

<sup>5</sup> Red line proposed development area, used for purposes of capacity calculation

Site No	Name	Size (hectares)	Current use	Suitable for housing	Indicative capacity (number of dwellings) <sup>4</sup>	Justification
4	Land to the North of Little Springfield Farm	1.35	Paddock	No	-	As justification for Site 3
5	Land at Foxbridge Golf Course	4.85	Nine-hole golf course with club house, driving range and car park	No	-	As justification for Site 3
6	Little Springfield Farm	0.6	B2 and B8 use class and additional small paddock	No	-	As justification for Site 3

Site No	Name	Size (hectares)	Current use	Suitable for housing	Indicative capacity (number of dwellings) <sup>4</sup>	Justification
7	Land Adjacent to the Dairy and Edmund's Hill, Plaistow	0.6	Residential curtilage and field	Yes	7 (at 15 dph, 80% of area developable)	<p>Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Would need to be developed sensitively with regard to the Plaistow conservation area and nearby listed buildings. No other planning constraints apparent. Despite position within rather than on edge of Plaistow conservation area, in fact relatively less likely to have significant visual impact on conservation area than Site 1, which is larger, more visually prominent and has a greater perception of being located in a rural rather than a village location. This site has few planning constraints except for on-site trees (though these are not covered by tree preservation orders) and as such is considered suitable for development. It offers the potential for enhancement of the village conservation area through sensitive design within the Conservation Area on the frontage to Rickman's Lane and in minimising its impacts on nearby listed buildings. Density of 15 dph applied to take account of impact on Plaistow Conservation Area and 80% developable area calculated to help minimise tree loss on northern part of site. However, very few constraints of this nature on southern half of site.</p>

## 2 Introduction and Approach

AECOM has been commissioned to undertake an independent site assessment for the Plaistow and Ifold Neighbourhood Plan. The work undertaken was agreed with PIPC and the Department for Communities and Local Government (DCLG) in June 2016 and carried out during July and August 2016.

PIPC has made good progress in undertaking the initial stages of preparation for the Neighbourhood Plan and is now looking to ensure that key aspects of its proposals will be robust and defensible. In this context, the Neighbourhood Group has asked AECOM to undertake an independent and objective assessment of the sites that are available for housing for inclusion in the Neighbourhood Plan.

The emerging Chichester District Council (CDC) Site Allocation Development Plan Document (DPD)<sup>6</sup> allocates sites for housing development across the District. CDC has stipulated a housing target of ten dwellings for Plaistow and Ifold, to be developed on land north of Little Springfield Farm. However, the parish council does not support development at this location and as such is seeking to allocate two alternative housing sites within the parish, alongside the possibility of back-up sites to contribute to the overall housing need for the parish.

The purpose of the site appraisal is therefore threefold;

- A review of the evidence and methodology underpinning the site assessment process carried out by the group and advice on any further steps that may be needed to ensure it is robust.
- To assess the results of the site assessment process so far to ensure they are justified and comply with local and national planning guidance
- To make recommendations on the most suitable sites to take forward for consideration in the neighbourhood plan, and the criteria/evidence that would underpin these recommendations.

This is to ensure that the site selection process will be robust enough to meet the Basic Conditions considered by the Independent Examiner, as well as any potential legal challenges by developers and other interested parties.

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<sup>6</sup> Available online at <http://www.chichester.gov.uk/siteallocation>

## 3 Planning policy context

### 3.1 Local and National Planning Policy

The Parish is located within Chichester in West Sussex. The Neighbourhood Plan and policies contained within it must comply with the overarching policies contained in Chichester District Council's current and emerging Local Development Plan.

The National Planning Policy Framework (NPPF) published by the Government in 2012 is also an important guide in the preparation of local plans and neighbourhood development plans. The PINP must demonstrate that it is consistent with the NPPF policies.

The key element of the development plan for Chichester is currently the Chichester Local Plan: Key Policies (adopted July 2015). The PINP must be in general conformity with the strategic policies of the development plan as required by paragraph 184 of the NPPF.

The emerging Site Allocation DPD covers the fifteen year period of 2014 to 2029. The plan acknowledges the important role of neighbourhood plans in forming the development plan for the District.

The current position is, as per Site Allocation DPD, that ten dwellings will be delivered on the land north of Little Springfield Farm. However, this part of the Local Plan, though it carries a degree of weight in planning terms, is still emerging and the Parish Council is seeking to influence CDC's approach before the Site Allocation document is formally adopted.

AECOM notes that the Site Allocation DPD does make specific provision for cases where neighbourhood planners may wish to allocate different sites from those preferred by CDC: the document states (page 7) that for parishes within the District that did not have a Neighbourhood Plan with its Pre-Submission Stage complete by the end of March 2016 (which includes Plaistow and Ifold), it should be the Site Allocations process that determines which sites in the parish are developed.

If this statement is taken at face value, it would mean that, as per the Site Allocation DPD, it would be the land north of Little Springfield Farm that would be developed for ten dwellings, without the Neighbourhood Plan able to have a say. However, PIPC is still hoping to influence the DPD approach before adoption by seeking twelve homes rather than ten on one or more alternative sites, and aiming to persuade the District Council to extend or waive the March 2016 deadline.

### 3.2 Relevant Planning Policies

The emerging Site Allocation DPD proposes a series of strategic policies that set the policy framework for all the neighbourhood plans in the District, alongside the Core Strategy 2007. The relevant policies for the PINP are set out below:

- Policy SA1: Identified Sites, which states that sites identified for development or redevelopment should be delivered in accordance with the requirements specified in the relevant schedule. All identified proposals and sites that come forward during the lifetime of the Site Allocation DPD should comply with relevant policies set out in the Chichester Local Plan: Key Policies 2014-2029 and any other relevant policies and guidance; and
- Policy PL1: Land north of Little Springfield Farm, which states that land north of Little Springfield Farm is allocated for about 10 dwellings on 0.4 hectares. The site will be developed with provision of satisfactory means of access and appropriate landscaping and screening along the access to Little Springfield Farm to minimise the impact of development on the landscape and the surrounding area.

The Neighbourhood Plan must also have regard to all relevant policies in the 2015 Local Plan.

## 4 Site Assessment

### 4.1 Work carried out by the group to date

As set out on the PIPC website<sup>7</sup>, the Neighbourhood Plan process has involved assessment of thirteen sites across the parish, including seven in Plaistow, five in Ifold and one in Durfold Wood. Since this assessment, a further site that was proposed at a consultation session (land adjacent to the Dairy/Edmunds Hill, Rickman's Lane) has brought the total of sites considered to fourteen.

These sites have been identified mainly through a 'call for sites' with local landowners, developers and agents, but also with reference to CDC's Site Allocation and SHLAA processes. A Method Statement for the parish work on site allocations so far is available on the PIPC website<sup>8</sup> and describes the process as follows:

- All sites received were assessed on the same criteria through a process known as the 'first sieve';
- Then, sites large enough to accommodate six or more houses and were available to come forward in the plan period were progressed into the 'second sieve', and residents were invited to state their preferences for which of these sites should be developed.

All sites in the 'second sieve' have been illustrated in Google Earth by AECOM as per Figure 1 below.

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<sup>7</sup> See <https://plaistowandifoldparishnp.com/sites/all-sites-identified/>

<sup>8</sup> See <https://plaistowandifoldparishnp.files.wordpress.com/2016/06/method-statement-for-identifying-potential-sites-for-housing-development.pdf>

**Figure 1: All sites in 'second sieve' for Plaistow and Ifold Neighbourhood Plan**



The methodology for considering sites was as follows:

- Members of the Neighbourhood Plan Steering Group worked with CDC Planning Officers originally identified the sites detailed on the 2nd and 23rd July 2014 following a mapping exercise and then a physical inspection of each site. Each site was assessed using the Chichester District Council SHLAA.
- Only the principal settlements in the parish were considered as these have some primary facilities. The other two hamlets of Durfold Wood and Shillinglee do not have any facilities and only a limited bus service, thus were considered less sustainable. They are small settlements and therefore any development would have a far greater impact on the hamlets themselves and on the countryside.
- The sites comprising the 'first sieve' were assessed against the following criteria:
  - CDC adopted Local Plan 2014 -2029
  - CDC Site Allocations Development Plan Document (DPD)
  - Plaistow Conservation Area: Character Appraisal & Management Proposals
  - Ifold Settlement Boundary
  - The Plaistow Village Trust consultation documents (2012-2013)
  - Ifold 2013 Public Consultation outcome

- Potential to come forward in the plan period
- Site constraints
- National Planning Policy Framework (NPPF)
- Neighbourhood Plan Household Survey and Housing Need Assessment (March 2016).

- The sites able to accommodate six or more dwellings were then carried forward to the Second Sieve. Although in total there were six such sites, only four were ready in time to be included in the Neighbourhood Plan Household Survey and Housing Needs Assessment (March 2016), which allowed residents to rank sites in order of preference.

The remaining two sites have been subject to public consultation since then- however, it is possible that any landowner whose site performed poorly in the Household Survey could, with some justification, claim that performance could have been different and assessment more consistent had all six sites had been presented at the same time. Additionally, it seems that the site whose availability has just been confirmed (land adjacent to the Dairy/Edmunds Hill, Rickman's Lane) is a seventh site, and even during the AECOM assessment process its area and boundaries were extended.

As such, given that the pool of sites to consider has only just been finalised, PIPC might consider a final community workshop or similar event whereby all seven sites could be presented and scored at the same time and on a consistent basis (ideally incorporating the conclusions of this report as well, in which case the pool of sites to assess could be reduced from seven, some having been eliminated already), particularly in light of the difference between the (current) conclusions of the CDC Site Allocation DPD and the PIPC site assessment process.

The final conclusion of the PIPC Site Assessment process is that two separate sites, each of six dwellings, one in Plaistow and one in Ifold, are considered the optimal solution, having less impact on the parish and on its two main settlements. The two sites selected as the best-performing are land adjacent to Todhurst, Plaistow and Little Springfield Farm, Ifold.

## 4.2 Site identification and assessment

In order for the neighbourhood plan to allocate a site or sites for development, evidence is required to demonstrate that the site is deliverable, which means the site is suitable, available and economically viable.

### Site identification process

Many of the general principles underpinning the site identification process that has been undertaken appear to be sound. A Housing Needs Assessment has been carried out which indicates a relatively low level of housing need. The site allocation process is responding to that Assessment. The site assessment criteria are derived from a mixture of national, local and parish-level considerations.

The group has used CDC policy and evidence base documents e.g. the SHLAA, the emerging Site Allocation DPD and the adopted Local Plan, as well as sites submitted by developers to identify potential sites for allocation in the plan.

All four sites in the parish that the SHLAA considered suitable, available and achievable for development<sup>9</sup> have been included in the Table of Sites Identified and Assessed<sup>10</sup>, as is the single site identified by the Site Allocation DPD (Land to the north of Little Springfield Farm). As such, the Table of Sites appears an accurate and complete representation of the potential available (though does still require addition and assessment of the site identified later in the process, namely land adjacent to the Dairy/Edmunds Hill, Rickman's Lane).

<sup>9</sup> Namely, land at Shortlands (PL1503), land south of Barnwood (IF08371), land at Little Springfield Farm (IF1501), and Land South of Foxbridge Drive (South) (IF08416).

<sup>10</sup> Available at <https://plaistowandifoldparishnp.files.wordpress.com/2016/05/table-of-sites-identified-and-assessed-a3.pdf>

### Site assessment process

In order for a site to be allocated in the neighbourhood plan it must be demonstrated that the site is suitable, available and achievable (economically viable), in compliance with the government's National Planning Policy Guidance<sup>11</sup>. The sites being considered are all available, as they have been submitted by developers, or landowners with an intention to develop. The sites are likely to be economically viable because they are being promoted by developers, but this will need to be verified before the sites are allocated. CDC will be able to advise on site viability, and as the group is aware, Locality and AECOM offer a viability support package for neighbourhood planners.

We would, however, question the conclusion in the Table of Sites Identified and Assessed that because the land to the north of Little Springfield Farm was deemed the least preferred in the Neighbourhood Plan Household Survey and Housing Needs Assessment (March 2016) it is unlikely to be released by the landowner for development.

This conclusion does not follow logically, and indeed is inconsistent with its inclusion in CDC's Site Allocation document. It seems unlikely that it would have been carried forward into the Site Allocation DPD without such evidence of landowner willingness to develop. As such, we advise checking this conclusion with CDC and/or the landowner.

The site assessment matrix (also called the SHLAA, though to avoid confusion with CDC's own SHLAA, we will henceforth refer to it as the PIPC SHLAA) that has been produced for each site is a good starting point to test which of the sites are suitable. The criteria used are appropriate and cover a wide range of factors to help determine site suitability; however, in some places additional information could also be helpful. For example, the Little Springfield Farm PIPC SHLAA form notes under 'Planning History' that the site was the subject of an unsuccessful appeal and that it was discounted from the CDC SHLAA but fails to note in either case the reason for the site failing at appeal or it having been discounted from the CDC SHLAA, even though both of these considerations are highly relevant to determining its suitability for development.

Linked to this issue is the fact that the land north of Springfield Farm, as per the summary in the Findings section of the Method Statement, appears in fact to perform well on site-specific technical criteria, with its discounting appearing to be more on the basis of community opinion.

It is entirely right and proper to base allocation decisions on community opinion up to a point. However, as currently phrased, there is the risk that the Neighbourhood Plan Inspector may conclude the appropriate balance needed in the site assessment process between community opinion and technical suitability might be too heavily weighted towards the former.

Note as well in the case of this particular site that as PIPC's intention is to develop one site at Ifold and one at Plaistow, the performance of any site in Ifold need not and should not be compared relative to any in Plaistow and vice versa. Rather, if the balance between the two settlements is the overarching approach, the sites should be divided into a Plaistow pool and an Ifold pool and assessed relative only to other sites within or adjacent to the same settlement. However, note our conclusions on the undesirability of balancing development between the two settlements in any case below.

The assessment set out below covers all points in more detail for all seven sites in the Second Sieve pool and as such is intended to assist in and possibly modify the selection of sites for allocation.

## **4.3 Review of individual sites**

A summary of site information for each of the seven sites in the Second Sieve is set out in the tables below, with site name, area in hectares, description, CDC SHLAA status, the interim PIPC SHLAA conclusions and AECOM's assessment set out for each site. Recommendations for each site are included, based on all available evidence. The information in the PIPC SHLAA and the CDC evidence base has been analysed and has informed the conclusions and recommendations, but AECOM have also performed an independent desktop assessment, using the Government's Magic map<sup>12</sup> and the Chichester Local Plan Policy Map<sup>13</sup>.

The housing capacity is the recommended number of dwellings on each site. This is an independent estimate calculated by AECOM using the following approach:

<sup>11</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/preparing-a-neighbourhood-plan-or-order/>

<sup>12</sup> <http://magic.defra.gov.uk/MagicMap.aspx>

<sup>13</sup> <http://mydistrict.chichester.gov.uk/?tab=maps&MapSource=Chichester/localplan>

The site area has been taken from PIPC assessment, development proposal documents, or, in the absence of these, using Google Earth Pro for measurements. For each site the *net* developable area has been calculated<sup>14</sup>. This refers to the area available for housing, once the land for supporting uses has been taken into account. For small sites this is generally access roads, parking and any green spaces such as play areas. For larger sites, this can include community facilities and other services and infrastructure.

- Sites under 0.4 ha – 100% site area is developable
- Sites 0.4 to 2 hectares – 75% to 90% of site area is developable
- Sites over 2 hectares – 50 to 75% of site area is developable

Once the net site area has been calculated, a density calculation is applied, i.e. number of dwellings per hectare.

Which density figure should be used? The national indicative minimum density until the introduction of the NPPF was thirty dwellings per hectare, even in the smallest settlements. However, following the introduction of the NPPF, neighbourhoods and local authorities are more free to determine the densities that are best for their context. For small rural settlements like Plaistow and Ifold, based on past experience and measurements of site-level densities locally, we have concluded that the most appropriate density range to use, which strikes a balance between respecting the existing settlement context but also minimising the need for new land to be developed would be in the following range:

- Twenty dwellings per hectare for sites without significant planning constraints; and
- Fifteen dwellings per hectare for sites that are more constrained (in the Plaistow and Ifold context, this mainly relates to sites within or adjacent to the Plaistow conservation area and/or having an impact on the setting of listed building(s)).

The capacity figures are broad estimates of capacity, and are intended to refine the PIPC SHLAA assumptions. It should also be noted that in some cases the individual site promoters may have calculated their own housing numbers based on design exercises and for some sites these may be more accurate than the figures based on density multipliers set out in this report.

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<sup>14</sup> AECOM calculation, based on DETR 1999 Tapping the Potential

## Site assessments

Site 1 – Land Opposite the Green, Plaistow	
Site Area (ha)	1.35
Description	Pasture
Map	
CDC SHLAA/Site Allocation conclusions	No commentary in Site Allocation or SHLAA
PIPC interim conclusions <sup>15</sup>	The site is well located for Plaistow village amenities/sustainability. It has a high preference rating but with an equal number of parishioners not preferring the site. Indicating that it is probably both well located for development in the village but also that it is a very sensitive site and would have impact if developed. The site could meet the Parish housing need.
AECOM assessment	The PIPC SHLAA correctly identifies that the site is opposite a Grade II listed house (Golden Cross), and Plaistow conservation area. Golden Cross adjoins Stone House, also Grade II listed. These are considered the key constraints to development in this location and the key factors to consider in terms of suitability relative to other Plaistow sites. Agree with PIPC conclusions on location relative to amenities/sustainability.
Conclusions and Recommendations	The key technical constraints, namely views into and out of Plaistow conservation area and two Grade II listed buildings in close proximity, should be added to the PIPC interim conclusion alongside the views of local residents.

<sup>15</sup> Source for Sites 1-6: Potential Housing Development Sites To Meet Housing Allocation 2014-2029 Method Statement (available at <https://plaistowandifoldparishnp.com/sites/all-sites-identified/>)

Site 2 - Land Adjacent to Todhurst, Plaistow	
Site Area (ha)	1.36 (0.47 red line proposed development area)
Description	Rough woodland, rough grass, scrubland.
Map	
CDC SHLAA/Site Allocation conclusions	Discounted in the SHLAA for the following reason: Plaistow does not have a Settlement Boundary and is contrary to policy. The development of the site would have an impact on Conservation area and listed buildings (Back Lane Cottage and Old Red Hatch).
PIPC interim conclusions	The site is well located for Plaistow village amenities /sustainability. The survey preferences were equally balanced for and against the site. The site is sensitive for loss of green space and potential environmental impact. The site could meet the Parish housing need.
AECOM assessment	Again, it would be helpful if the conclusion balanced the survey preference with a more detailed description of technical constraints. Loss of green space, though important, is less relevant given that allocation of any other Second Sieve site would entail such loss. Loss of trees more relevant as this is the most wooded of the Plaistow sites. However, the most significant planning constraints for the blue line area (which are also noted in the PIPC SHLAA) are location within Plaistow conservation area and adjoining listed buildings. Note that the site adjoins four, not two, Grade II listed buildings- as well as Back Lane Cottage and Old Red Hatch, also Todhurst and barn south-west of Todhurst. However, proposal to retain eastern half of site as green space, ideally with no loss of trees, renders the site far more suitable for development and enables it to perform better on technical criteria than Land opposite The Green.
Conclusions and Recommendations	If only the red line area were developed for housing, then the site performs well on all technical criteria except for the loss of (unprotected) trees. As such, a condition of development could be like-for-like replacement of lost trees within the green space element of the development. Agree with PIPC conclusion that the site is suitable for allocation.

Site 3 - Shortlands, Durfold Wood	
Site Area (ha)	2.4
Description	Residence with Private Garden
Map	
CDC SHLAA/Site Allocation conclusions	In Site Allocation document, on longlist of candidate residential sites, but no accompanying commentary or description
PIPC interim conclusions	The site is poorly located for Plaistow or other village amenities /sustainability. While the site has a high preference rating it fails on the grounds of sustainability. The large size and location of the site would make it less suitable to meet the Parish housing need.
AECOM assessment	The PIPC SHLAA incorrectly states the site adjoins ancient woodland, whereas Magic mapping (also noted by the Chichester SHLAA) confirms that the site itself (except for the house and some of the garden) is ancient woodland.
Conclusions and Recommendations	Suggest PIPC SHLAA is updated to reflect the fact that the site itself is ancient woodland, as this is the most important factor rendering it unsuitable for housing development, irrespective of other planning considerations. Therefore agree it should not be allocated. We note also the conclusion of the method statement that the preferred approach is to allocate one site in Plaistow, one in Ifold. Presumably this site was assessed before such a decision was made? As such, the process would likely benefit from more clarity on when the Plaistow/Ifold only decision was reached and on what criteria this judgement was made, e.g. sustainability. If this decision was made relatively early in the process, there is presumably a case for the Second Sieve to contain only Plaistow/Ifold sites. If this decision was made later in the process, it would be helpful if the method statement described what, if anything, changed during the process for the 'Plaistow/Ifold only' approach to have emerged.

## Site 4 - Land to the North of Little Springfield Farm

Site Area (ha)	1.35
Description	Paddock
Map	 <p>Land to the North of Little Springfield Farm, Plaistow Road, Ifold</p>
CDC SHLAA/Site Allocation conclusions	<p>Allocated for development by emerging Site Allocation DPD Policy PL1: Land north of Little Springfield Farm is allocated for about 10 dwellings on 0.4ha. Site requirements: The site will be developed in accordance with the following site specific criteria: Provision of satisfactory means of access; and provision of appropriate landscaping and screening along the access to Little Springfield Farm to minimise the impact of development on the landscape and the surrounding area.</p>
PIPC interim conclusions	<p>The site is reasonably located for limited Ifold village amenities /sustainability. This is the least preferred site by parishioners in the 2016 survey. This is the site allocated by CDC in their draft allocations document (currently under consultation). It is less sustainable than the Plaistow sites but better than Site 3: Shortlands, Durfold Wood or Site 5: Land proposed at Foxbridge Golf Course. The site could meet the Parish housing need.</p>
AECOM assessment	<p>Site itself free from all planning constraints and adjoins existing built-up area. Agree with PIPC that it is reasonably located for village amenities. PIPC SHLAA states that 'amenities in Loxwood approx. 2.5km from Ifold, may be accessed via public footpaths.' The likelihood of 5km round trips on foot, including some walking on roads, is considered low relative to the temptation to drive, and this underlines the fact that any development in Ifold is less sustainable (see conclusion below). Agree that site is more sustainable/suitable than Site 5, but consider its sustainability relative to Plaistow and Durfold Wood sites should not be a factor in consideration of suitability (see below). Accept site least preferred by parishioners on basis of process to date.</p>
Conclusions and Recommendations	<p>Again, if the overall policy approach to the site allocations process is to allocate one site in Plaistow and one in Ifold (which appears to have been made on the grounds of local political acceptability), then this site should be allocated by default as it is the only site directly adjoining the settlement of Ifold. If this is the approach to be taken, then the site's performance relative to sites in Plaistow and Durfold Wood is not relevant, as it should be assessed only against other sites in Ifold. However, it is accepted that this site is the least preferred by parishioners. As such, it is a policy choice for PIPC to determine which of these two considerations, currently at cross-purposes, should be prioritised. One possible approach would be to allocate this site and one in Plaistow, taking account of its overall technical suitability for housing development. The alternative, which we strongly recommend, would be to allocate one or more sites in Plaistow alone. Although presumably this would also be less popular in terms of local opinion, it would take much better account of relevant national and local sustainability criteria, reflecting the fact that Plaistow has more local facilities/amenities than Ifold (shop, pub, primary school)<sup>16</sup> and is therefore a more sustainable location for growth. As such, like PIPC, but for different reasons, we do not support CDC's allocation of this site. See also conclusions on Site 6.</p>

<sup>16</sup> With the permanent closure of Oak Tree Stores in 2015, Ifold now has no shops and Plaistow's relative sustainability has increased further. (Source: <https://ifolduk.wordpress.com/2015/07/11/oak-tree-stores-to-close/comment-page-1/>, and also referenced in para. 19 of the recent Appeal decision at Little Springfield Farm). As such, the PIPC SHLAA's assessment that the shop is temporarily closed needs to be updated.

## Site 5 - Land at Foxbridge Golf Course

Site Area (ha)	4.85
Description	Currently a nine-hole golf course with club house, driving range and car park
Map	
CDC SHLAA/Site Allocation conclusions	No commentary in Site Allocation or SHLAA
PIPC interim conclusions	The site is poorly located for Plaistow or Ifold village amenities/sustainability. The majority of informal responses from the Neighbourhood Plan public consultations, indicates that residential development of this site is not preferred. Retention of a venue, which can be used by the community and expansion of commercial recreational facilities with perhaps small scale enabling residential development, if necessary, is preferred. The site does not meet the sustainability criteria, its size and location would make it less suitable to meet the Parish housing need
AECOM assessment	Agree with all PIPC interim conclusions and PIPC SHLAA commentary. Given local housing need, it is neither necessary nor appropriate to develop a site on this scale, and its location away from settlement edges in open countryside is another significant factor in discounting the whole site or any part of it as unsuitable for residential development on grounds both of sustainability and landscape and visual impact.
Conclusions and Recommendations	This site is considered by some distance the least suitable of the Second Sieve sites for the reasons mentioned above.

Site 6 - Little Springfield Farm (brownfield site)	
Site Area (ha)	0.6
Description	B2 & B8 use class and additional small paddock
Map	
CDC SHLAA/Site Allocation conclusions	In Site Allocation document, on longlist of candidate residential sites, but no accompanying commentary or description.
PIPC interim conclusions	The site is reasonably located for limited Ifold village amenities /sustainability. The site meets the criteria for giving preference to developing brownfield sites over greenfield. The site is no less sustainable than Site 4: Land to the North of Little Springfield Farm or residential development in Ifold generally. The site is relatively small. Development for 10 units is likely to give inappropriate density and massing, however, a smaller number would reduce the impact on the countryside.
AECOM assessment	<p>Disagree with many statements in PIPC SHLAA and conclusions. Our own assessment, which is strongly supported by the 2016 appeal decision on this site, is that this is less sustainable than nearby Site 4 due to its location away from the settlement, it being surrounded on all sides by open countryside, and as such, less suitable than other Ifold sites. It would also need more enabling works on access than Site 4. PIPC SHLAA states that 'amenities in Loxwood approx. 2.5km from Ifold may be accessed via public footpaths.' The likelihood of 5km round trips on foot, including some walking on roads, is considered low relative to the temptation to drive, and this underlines our previous conclusion that any development in Ifold is less sustainable. PIPC SHLAA notes potential for impact on ancient woodland adjoining; we agree this is a relevant consideration. Agree that, if developed, development should be less than ten units.</p> <p>The PIPC SHLAA is right to reference the January 2016 appeal decision on the site; however, it should be covered in much more detail, in particular the reasons for refusal. Like any site subject to a recently dismissed planning appeal, the reasons for refusal carry significant weight in planning terms and need to be taken into account in the PIPC assessment, ideally being added to the list of criteria in the Method Statement. Paragraphs 19-24, 28-29 and 35-36 of the appeal decision in particular comprise the main reasons why the site is not considered suitable for residential development by the Inspector on national and local planning criteria, and having reviewed the decision, AECOM agrees fully with its conclusions, as they accord exactly with our own judgements on the basis of national and local planning and sustainability criteria set out above. Three points arising from the unsuccessful appeal are particularly important for the purposes of the Neighbourhood Plan: a) the fact that the site's unsustainable location away from the settlement edge is a constraint that cannot be mitigated at present, b) the fact that the site is considered an unsustainable location for three dwellings, which renders it even less sustainable for six dwellings and c) (probably the most important for the purposes of the site assessment exercise) the Inspector's conclusions on the unsustainability of Ifold generally in terms of services and facilities.</p>

**Conclusions and Recommendations**

Based on our own independent assessment, and backed up fully by the Inspector at the recent appeal on the site, this site is considered unsuitable for residential development on national and local planning criteria given its location away from the settlement edge, the lack of local services and facilities, and its landscape and visual impact. The PIPC conclusion that the site is no less sustainable than Site 4 is not supported; such a conclusion risks undermining consistency of assessment with other sites rightly considered less sustainable due to their separation from an existing settlement (here, Foxbridge Golf Course).

The technical conclusions on the site appear to have been influenced by the results of the parishioner survey and/or local opinion (which was also noted by the Inspector, in paragraph 33 of his report) whereby this site is supported over Site 4; even if this is not deliberate, this is how the assessment could be perceived by an independent reviewer.

A more accurate, robust conclusion would be that this is the second-best of the Ifold sites in sustainability terms, on the basis of its location away from the settlement edge, its services and its amenities. However, note again the most important upshot of our overall conclusion: that Ifold is fundamentally a less sustainable location for growth than Plaistow in any case, thus rendering both Sites 6 and 4 less suitable. At present, the National Planning Policy Framework, when read as a whole, despite providing support for the principle of brownfield development, would not support any further residential development at Ifold due to the lack of services and facilities within walking distance. It would be virtually impossible for any party, including for CDC, to argue that development at Ifold would be justified for as long as there is no shop, school or pub in the village but there is a range of suitable and available sites at nearby Plaistow. Importantly, this conclusion could/should be used in the case against the currently proposed allocation of Site 4 by CDC. In paragraph 21 of his appeal decision, the Inspector stated that whether or not Site 4 was allocated was a decision for the plan-making process; AECOM agrees with this assessment, and consider that it is very likely it would not be able to be allocated through that process at present.

Site 7 - Land Adjacent to The Dairy and Edmunds Hill, The Street, Plaistow	
Site Area (ha)	0.6
Description	Residential curtilage and field, partly in the conservation area.
Map	
CDC SHLAA/Site Allocation conclusions	No commentary in Site Allocation or SHLAA
PIPC interim conclusions <sup>17</sup>	Nearby Golden Cross House, Edmund's Hill and The Dairy are unlisted but have been identified on the Plaistow Townscape Appraisal Map as being positive buildings of townscape merit. The site location fulfils sustainability criteria located near to Plaistow facilities and services. The site, as currently specified, is 0.6 hectares in size.
AECOM assessment	Like Site 1, the site is close to Grade II listed Golden Cross and Grade II listed Stone House. In PIPC SHLAA, note that site does not adjoin, rather is partially within Plaistow Conservation Area (eastern quarter of site). No other planning constraints apparent. Despite position within rather than on edge of Plaistow conservation area, due to position in fact relatively less likely to have significant visual impact on conservation area than Site 1, which is larger, more visually prominent and has a greater perception of being located in a rural rather than a village location.
Conclusions and Recommendations	This site has few planning constraints and as such is considered suitable for development. It offers the potential for enhancement of the village conservation area through sensitive design within the Conservation Area on the frontage to Rickman's Lane and in minimising its impacts on nearby listed buildings. Given that Plaistow is more suitable for development than Ifold in terms of sustaining local services and reducing the need to travel by car, then this site is considered, mainly on landscape and visual criteria, to be the second most suitable site in Plaistow after Site 2.

<sup>17</sup> Source: SHLAA Land adjacent to the Dairy and Edmund's Hill Cottage (available at <https://plaistowandifoldparishnp.files.wordpress.com/2016/07/shlaa-land-adjacent-to-the-dairy-edmunds-hill-cottage1.pdf> )

## 5 Conclusions and recommendations

The purpose of this review has been threefold;

- To review the site assessment process carried out by the group and advise on further steps needed to ensure it is robust;
- To assess the results of the site assessment process to ensure they are justified and comply with local and national planning guidance; and
- To make recommendations on the most suitable sites to take forward for consideration in the neighbourhood plan.

A summary of the findings has been set out below.

### 5.1 Process carried out by the group

The site identification process that has been undertaken started off sound in terms of its methodological approach. A housing needs assessment has been carried out which indicates a need for 12 dwellings across the parish. The parish council is aiming to allocate sites which will provide for this level of housing over the period of the neighbourhood plan, and carried out a call for sites which ensured that potential locations for development over and above those previously identified by the CDC SHLAA and Site Allocation documents could be assessed.

The site allocation process is responding to an invitation on the part of CDC for neighbourhood plans to identify suitable sites for housing allocation and the parish council will continue to work with CDC on the site assessment process. A range of relevant criteria were taken into account when seeking to determine the suitability or otherwise of development on the sites selected.

AECOM's independent assessment of the process is that this generally sound methodology resulted in broadly sound conclusions on six of the seven sites assessed. However, we consider that the conclusions on Little Springfield Farm are flawed and would not as currently drafted meet the Basic Conditions of neighbourhood planning<sup>18</sup>, specifically:

- Basic Condition d), whereby the neighbourhood plan must contribute to the achievement of sustainable development and
- Basic Condition e), whereby the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area, in this particular case the Chichester Local Plan Policy 1: Presumption in Favour of Sustainable Development.

If PIPC accepts this conclusion on Little Springfield Farm, the wider question is therefore raised about sustainability of any development at Ifold. Based on the evidence of services and facilities at Plaistow versus those at Ifold, AECOM considers it would be very hard to make a case for any development at Ifold whatsoever, irrespective of the NPPF's support for brownfield development- this relatively narrow, site-specific consideration is easily outweighed by the NPPF's overall approach to sustainable development, and allocations would have to be assessed against the document as a whole.

This is not only AECOM's own view, but likely to be the views of the Inspector at the Chichester Site Allocation DPD Examination and of the Examiner at the Neighbourhood Plan examination. As such it is surprising that CDC are seeking a site of ten dwellings in this location; the chances of Site Allocation Policy PL1 surviving the document's Examination in Public have to be seen as very low in the light of the appeal decision at Little Springfield Farm and with regard to the definition of sustainable locations for development in both the NPPF and in CDC's own local plan. Indeed, a conversation with CDC confirmed that the current allocation does not take account of the implications of the appeal decision at Little Springfield Farm but will in future.

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<sup>18</sup> Available online at <http://www.chichester.gov.uk/CHttpHandler.ashx?id=24759&p=0>

We therefore consider that the site assessment methodology could and should be strengthened in two key ways:

- Firstly, by naming and using the appeal decision at Little Springfield Farm as one of the main criteria against which all sites are assessed- this will then result in not only Little Springfield Farm but also Land North of Little Springfield Farm being assessed as unsustainable for development; and
- Secondly, by recognising that the approach to sustainable development in the English planning system as set out in the NPPF and reiterated in both Chichester's adopted Local Plan and in the Little Springfield Farm appeal decision means that Plaistow is effectively the only settlement in the parish that could be considered suitable for new housing development. This would replace the current approach of allocating development equally to Plaistow and Ifold, which, though understandable from the point of view of equality, is not otherwise supported by the evidence or the national planning system, and, as such, appears contrary to two of the Basic Conditions of neighbourhood planning. It would also enable local residents to understand that, though Little Springfield Farm may be considered sustainable in terms of brownfield land, this consideration is easily outweighed both by its location away from the settlement boundary and by Ifold's overall lack of sustainability as a location for new growth.

As such, we recommend that instead, one or more sites is allocated at Plaistow, where new housing will be within walking distance of a primary school, a shop and a pub, with positive implications for the future of these three vital services. In practical terms, this is likely to be Land Adjacent to Todhurst and then the best performing of the other sites, which in AECOM's view, taking all relevant criteria into account, would be Land Adjacent to the Dairy and Edmund's Hill.

If it is considered that a reserve site is required in the event that the two best-performing sites do not come forward for development for any reason, Land Opposite the Green appears the most suitable in this regard.

However, we note the importance attached in the planning system and by PIPC to the opinions of local stakeholders on the relative suitability or otherwise of sites. As we understand that the Land Adjacent to the Dairy and Edmund's Hill has not yet been subject to public consultation on an equal basis with other sites, we recommend testing our technical conclusions on the suitability of the Plaistow sites with the local community, in order to confirm whether or not the proposed priority order of Land Adjacent to Todhurst, then Land Adjacent to the Dairy, then Land Opposite the Green would be considered acceptable by local residents.

There is, of course, also a case to be made for seeking local views on whether a 'Plaistow-only' approach is acceptable. However, in our view, the arguments against allocating any site at Ifold in terms of national and local policy on planning and sustainability are clear and compelling.

## 5.2 Recommendations on sites to take forward

The table overleaf summarises the review of the AECOM site assessment process and recommends which sites are suitable for housing and should be considered as residential site allocations.

The findings show that three of the seven sites are considered suitable for housing. It is for PIPC to now decide which of these suitable sites or combination of sites to put forward for allocation to meet the housing need identified for the parish and to contribute to the wider housing need of Chichester District.

We have applied the densities and developable area calculations specified in section 4.3 above to the sites for the purposes of determining capacity, and have justified our assessment in each case.

The options for PIPC if they agree with the conclusions of our assessment would be as follows, if a dwellings target of twelve applies:

- Either develop both sites two (Land Adjacent to Todhurst) and seven (Land Adjacent to the Dairy, Edmund's Hill), but at a lower density than that recommended, as together these would otherwise provide fifteen dwellings, more than is needed. Our recommendation in this case would be to lower the density on the northern part of site seven to reduce the impact of development on the conservation area and the existing mature trees. However, the southern part of the site is less constrained; OR
- Develop only site one (Land Opposite the Green), but at a lower density. Developing this site alone for twelve dwellings, and continuing to assume the site is 90% developable, would entail a reduced density of 9.9 dwellings per hectare. Though this has the greatest potential to reduce the development's impact on the Plaistow conservation area and nearby listed buildings, at the same time it would be a less efficient use of greenfield land than the previous option.

As noted previously, because we consider Sites Two and Seven to perform better than Site One on a range of criteria, our recommendation would be to select the first of these two options. This also has the advantage of diverging least from the group's existing conclusions.

Site No	Name	Size	Current use	Suitable for housing	Indicative capacity (number of dwellings) <sup>19</sup>	Justification
1	Land Opposite the Green, Plaistow	1.35	Pasture	Yes	18 (at 15 dph, 90% of area developable)	Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Needs to be developed sensitively with regard to the Plaistow conservation area and nearby listed buildings (hence 15 dph). The openness and visual prominence of this site leads AECOM to conclude that, though suitable for residential development, it is the only the third-best performing of the Plaistow sites. However, its size relative to the other sites offers the opportunity to develop this site alone. 90% developable area due to effectively no constraints within red-line boundary itself.
2	Land Adjacent to Todhurst, Plaistow	1.36 (0.47) <sup>20</sup>	Rough woodland, rough grass, scrubland	Yes	8 (at 20 dph, 90% of area developable)	Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Proposal to retain eastern half of site as green space, ideally with no loss of trees, renders the site far more suitable for development and enables it to perform better on technical criteria than Land opposite The Green. A condition of development could be like-for-like replacement of lost trees within the green space retained. Twenty dph used to reflect less sensitive location for development, and 90% developable area due to small size of site but also potential to retain some trees.
3	Shortlands, Durfold Wood	2.4	Residence with private garden	No	-	Site is not in Plaistow. The approach to sustainable development in the English planning system as set out in the NPPF and reiterated in both Chichester's adopted Local Plan and in the Little Springfield Farm appeal decision means that Plaistow is effectively the only settlement in the parish that could be considered suitable for new housing development. Any other approach would likely be contrary to two of the Basic Conditions of neighbourhood planning.
4	Land to the North of Little Springfield Farm	1.35	Paddock	No	-	As justification for Site 3

<sup>19</sup> As per considerations in section 4.3 above.

<sup>20</sup> Red line proposed development area, used for purposes of capacity calculation

Site No	Name	Size	Current use	Suitable for housing	Indicative capacity (number of dwellings) <sup>19</sup>	Justification
5	Land at Foxbridge Golf Course	4.85	Nine-hole golf course with club house, driving range and car park	No	-	As justification for Site 3
6	Little Springfield Farm	0.6	B2 and B8 use class and additional small paddock	No	-	As justification for Site 3
7	Land Adjacent to the Dairy and Edmund's Hill, Plaistow	0.6	Residential curtilage and field	Yes	7 (at 15 dph, 80% of area developable)	Good location in terms of walking distance to amenities, helping it perform well in terms of sustainability. Needs to be developed sensitively with regard to the Plaistow conservation area and nearby listed buildings. No other planning constraints apparent. Despite position within rather than on edge of Plaistow conservation area, in fact relatively less likely to have significant visual impact on conservation area than Site 1, which is larger, more visually prominent and has a greater perception of being located in a rural rather than a village location. This site has few planning constraints except for on-site trees (though these are not covered by tree preservation orders) and as such is considered suitable for development. It offers the potential for enhancement of the village conservation area through sensitive design within the Conservation Area on the frontage to Rickman's Lane and in minimising its impacts on nearby listed buildings. Density of 15 dph applied to take account of impact on Plaistow Conservation Area and 80% developable area calculated to help minimise tree loss on northern part of site. However, very few constraints of this nature on southern half of site.

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