



20 October 2017

The Parish Clerk
Mrs B. Weddell,
Plaistow & Ifold Parish Council,
Lock House Lodge,
Knightons Lane,
Dunsfold,
Surrey
GU8 4NU

Dear Clerk,

Subject: South Downs National Park Authority's response to the Plaistow and Ifold Neighbourhood Development Plan Pre Submission (Regulation 14) consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the pre submission version of the Plaistow and Ifold Neighbourhood Plan. The National Park Authority welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community. The SDNPA have made a number of comments relating to specific parts of the plan below.

Generally the SDNPA would like to see the plan make more specific reference to the National Park, particularly in regard to development constraints and the importance of protecting the landscape. Whilst part of the Parish falls within the National Park it is also important that the setting of the National Park is not unduly harmed by inappropriate development, therefore consideration should be given to the constraint created by views into and from the National Park.

The Parish Council are required to consult all statutory bodies as part of the Neighbourhood Plan regulations, this includes formally notifying the South Downs National Park Authority of regulation 14 consultation. The SDNPA request that future correspondence relating to the NDP is sent to neighbourhood@southdowns.gov.uk

Please note these comments are prepared by SDNPA officers only, they have not been considered or approved by SDNPA members.

SDNPA officers make the following comments on the Plaistow and Ifold NDP:



Ref	Comment	SDNPA Recommendation
	The progression of the Plaistow and Ifold Neighbourhood Development Plan (NDP) to pre-submission stage is welcomed by the South Downs National Park Authority (SDNPA), it's the result of a considerable amount of hard work by the Parish Council, steering group and volunteers.	N/A
Paragraph 1.3	This paragraph should also identify the South Downs National Park Authority as the Local Planning Authority for part of the parish, as shown on the Designated Neighbourhood Area map. It may be appropriate to make specific reference to the Pre Submission South Downs Local Plan at this stage, although it currently is not part of the development plan, there are a number of policies within the NDP which relate to policies in the South Downs Local Plan, such as the Dark Night Sky policy	<p>Make specific reference to the SDNPA being the Local Planning Authority for the part of the Parish within the National Park</p> <p>Consider specific reference to the Pre Submission South Downs Local Plan which will, once adopted, form part of the development plan</p>
Paragraph 1.3	There should be reference to the West Sussex Minerals and Waste Plan which also forms part of the Development Plan for the area	Make specific reference to the West Sussex Minerals and Waste Plan as part of the development plan to which the NDP must be in general conformity
Paragraph 1.4	It is the responsibility of the Parish Council to consult with all the relevant statutory bodies at Regulation 14 (Pre Submission) stage. The SDNPA is a formal statutory body and should have been formally consulted as part of the consultation. There was no formal request sent to SDNPA to alert the Authority to the Pre Submission consultation	Request that SDNPA are added to any distributions list held by the Qualifying Body to ensure that the requirement to consult all statutory bodies is met. All correspondence relating to neighbourhood plans should be sent to neighbourhood@southdowns.gov.uk
Paragraph 2 (Vision)	There is no reference to the National Park designation within the vision, this may be	Consider including reference the to South

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	appropriate given that a part of the park falls within this important designation, and maybe considered an important aspect of the Parish by the local community	Downs National Park in the vision
Paragraph 2.3	This would be an appropriate location to make specific reference to the South Downs National Park designation and the location of part of the Parish within this designation. The SDNPA would welcome reference to conserving and enhancing this part of the parish in line with the Purposes of the National Park Authority. The SDNPA would also welcome reference to the importance of protecting the setting of the National Park	Consider reference to the South Downs National Park purposes and duty and the importance of protecting the setting of the National Park
Aims and Objectives	There is considerable duplication in all objective sections, for example in the Community Infrastructure section there are 6 objectives relating to water management and sewerage, it may be appropriate to consider reviewing the objectives with a view to reducing their number and focusing the intentions of the NDP	Consider reviewing repetition in the objectives sections
Paragraph 3.1	This paragraph refers to the Parish bordering the South Downs National Park (SDNP) to the west. This is incorrect, part of the Parish is within the National Park, therefore the text should be amended to accurately reflect the status of the National Park within the parish	Accurately reflect that part of the Parish falls within the National Park
Paragraph 3.2	This paragraph needs to be amended to reflect that exactly 12.11% of the Parish falls within the National Park, including reference to the Designated Neighbourhood Area Map (map 1)	Amend reference to the portion of the Parish which falls within the South Downs National Park
Policy EHI	The policy makes no reference to the existing Conservation Area Appraisal and Management Plan, which may be relevant to this policy subject	Consider reference to the Conservation Area Appraisal and Management Plan
Policy EHI	As currently worded the policy is very long and could benefit from review to focus the intention of the policy.	Consider reviewing policy wording, specifically the inclusion of a criteria based approach to meeting policy requirements, this should list what is required of any application in relation protection of heritage assets. See Policy SD13 of the Pre Submission South Downs Local Plan as an example of this approach

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Policy EH2, Paragraph 4.7	The SDNPA welcome specific reference to the SDNP in the justification of this policy.	
Policy EH2	The Policy refers to the rural area of the parish. More clarification is required to provide certainty to applicants and decision maker. Is the rural area referring to everything outside the settlement policy boundary?	Define more precisely the rural area of the Parish
Policy EH2	Policy wording requires further review to ensure the policy can be used effectively by applicants and decision makers. Currently the policy is framed in a negative manner, it would be more appropriate for the policy to describe when development will be permitted	Consider review of policy wording to make the policy more effective and assist applicants and decision makers
Policy EH2	Policy EH2 refers to Arboricultural Impact Assessment being required on proposals. It may be more appropriate for this requirement to be included in Policy EH3 which relates specifically to trees, woodlands etc. As this policy deals primarily with the protection of the Natural Environment it may be more appropriate to require a Phases I habitat survey in support of certain applications	Suggest that the requirement for Arboricultural Impact Assessment is included at Policy EH3. Consider reference to Phase I habitat survey in policy EH2
Policy EH4, Paragraph 4.25	There is a reference in the policy to a policies map, however, there appears to be no policy map within the NDP or appended to it, suggest that a policy map is prepared and included with the NDP	Local Green Spaces should be shown clearly on the policies map to assist applicants and decision makers
Policy EH4, Paragraph 4.29	There is no need to describe the level of protection or situations where development may be appropriate on Local Green Spaces as this is set out clearly in the National Planning Policy Framework (NPPF)	Remove Paragraph 4.29 or replace with a simple reference to the relevant part of the NPPF
Policy EH4	It would be useful to include a table setting out each individual Local Green Space meets the criteria for designating Local Green Spaces, this could be included at section 4.23 or reference included at 4.23 to an appended table	Provide more detail to support the designation of Local Green Spaces
Policy EH5	Policy wording requires further review to ensure the policy can be used effectively by applicants and decision makers. It may be appropriate to use a hierarchal approach to artificial light emissions and how they should be considered, an example of this approach can be seen at Policy SD8 of the Pre Submission South Downs Local Plan	Consider review of policy wording to include a hierarchal approach to the control of artificial lighting emissions
Policy EH6	Consideration should be given to whether this policy is necessary as a separate	Consider whether this policy could be

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	policy, and whether it could be included as part of Policy EH5	included as a part of Policy EH5
Paragraph 4.40	Consider removing aims and aspirations from the main body of the NDP and placing them in an appendix for aspirational policy and aims which are not part of the NDP relating to land use policies, allocations and designations	Remove all aims and aspirational policies to a separate appendix to ensure applicants and decision makers are clear about which policies form the formal part of the NDP
Policy CII	A clearer definition of the areas of high or moderate flood risk is required, these areas should be shown clearly on the policies map. Alternatively reference could be made to formal flood zones as identified by the Environment Agency	Provide clearer definition of high and moderate flood areas in the Parish
Paragraph 5.15 – 5.22	Consider removing aims and aspirations from the main body of the NDP and placing them in an appendix for aspirational policy and aims which are not part of the NDP relating to land use policies, allocations and designations	Remove all aims and aspirational policies to a separate appendix to ensure applicants and decision makers are clear about which policies form the formal part of the NDP
Paragraph 5.21	It would be helpful if the buildings which are a focal point for the community were listed in the NDP or in an appendix to the NDP	List the relevant community buildings which are a focal point for the community. It is also worth considering these buildings for nomination as Assets of Community Value if appropriate
Policy HI	As currently worded a single dwelling could be built on the site and this would comply with the policy requirement for up to 11 dwellings to be allocated on the site. It may be more appropriate to identify an approximate number of dwellings to be allocated on the site, or provide a more detailed development brief which sets out an appropriate number of dwellings to meet the housing requirement set	Consider review of the Policy to ensure that the housing requirement for the Parish is met
Policy HI	The Policy currently requires the removal of all permitted development rights, however there appears to be no evidence or justification to support this requirement. Government guidance clearly states that 'such conditions will rarely pass the test of necessity and should only be used in exceptional circumstances' it may be appropriate for the NDP to provide more evidence to support this requirement. Alternatively, permitted development rights could be a development management consideration and applied at the applications stage rather than being imposed as a policy requirement	Consider whether the policy requirement to remove permitted development rights is appropriate

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Policy EE4	Consideration should be given to whether this site is appropriate as an allocation considering its remote location, and the fact that it is so remote from the existing settlement.	Consider whether this allocation is appropriate
Policy EE4	Is this a formal allocation, if so it should be clearly shown on a policy map and a map similar to that shows an Map 2 provided to clearly show the site as a formal allocation	Consider providing a map to support this site and define clearly whether this is a formal allocation in the NDP
Paragraph 8.11	Consider removing aims and aspirations from the main body of the NDP and placing them in an appendix for aspirational policy and aims which are not part of the NDP relating to land use policies, allocations and designations	Remove all aims and aspirational policies to a separate appendix to ensure applicants and decision makers are clear about which policies form the formal part of the NDP
Other		
SA/SEA	The Environmental report does not clearly set out how the reasonable alternatives have been identified. Currently the reasonable alternatives tested include options relating to the location of development. It is not clear whether all sites identified by the NDP for potential development have been considered in this test of reasonable alternatives. It is recommended that all sites identified for potential development are considered as reasonable alternatives in the Environment Report to provide a robust justification for the allocated site in the NDP. It would also be appropriate to consider the brownfield site identified in the NDP in the Environmental Report (SEA/SA)	Consider the reasonable alternatives proposed in the SEA/SA

If you would like to discuss any of these matters further please do not hesitate to contact me directly



Yours Sincerely

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