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**QUESTIONS & ANSWERS ARISING FROM REGULATION 14 CONSULTATION (Jan 2018)**

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**1. QUESTION:** Why have a Neighbourhood Plan (NP)?

**ANSWER:** Neighbourhood planning is a statutory right for communities, introduced through the Localism Act 2011, to allow them to shape development in their areas. The local parish or town council will lead on neighbourhood planning in their areas. Local people who know the area can create a plan that allows them to develop planning policies that reflect the priorities of their area. The whole community then decides at a referendum vote whether the local authority should bring the plan into force. An NP is an important document with real legal force, therefore there are certain formal procedures that it must go through.

In very simple terms, an NP is:

- A document that sets out planning policies for the neighbourhood area – planning policies are used to decide whether to approve planning applications.
- Written by the local community, the people who know and love the area, rather than the Local Planning Authority. But it must conform to Local and National Planning Policy i.e. we don't have free reign to decide anything we want.
- A powerful tool to ensure the community gets the right types of development, in the right place.
- the means to direct and control the location, type and style of housing. An NP is important due to Government pressure to build more houses across the region.

**2. QUESTION:** What happens if we don't have a Neighbourhood Plan?

**ANSWER:** Communities without an NP will be more vulnerable to aggressive planning applications for larger numbers of houses, or developments in areas where the community does not wish to see development. If there is no NP, the District Council will allocate sites for development but due to our remoteness from Chichester, less likely to reflect the best interests of the Parish. The Parish Council will however still be consulted on all proposed development. The Parish will only receive 15% CIL money, if it has no NP and not 25% for those with a Plan. CIL is used for capital projects in the Parish (CIL is community infrastructure levy on all new development).

**3. QUESTION:** Hasn't the draft NP just highlighted additional sites that could now be revisited in the future?

**ANSWER:** Quite possibly. But the reality for the future is that, with the Government pushing for thousands of new homes in the South of England, new development in our region is an unavoidable reality, and the only way of trying to manage this is through a Neighbourhood Plan.

**4. QUESTION:** What does the term 'sustainable' mean, and how is it relevant to a rural parish where we are all car dependent?

**ANSWER:** In planning terms, the principle of sustainability refers to ALL types of communities: rural villages, towns and cities and therefore the 'umbrella' of the term can only be taken in context to each individual community. It applies to three specific areas: Environmental, Social and Economic.

In our Parish, although we are all car dependent, the NPPF principle must be to minimize the use of the motor vehicle. In Plaistow village we are able to walk to our local shop, post office, church, pub, school, village hall, youth club, and facilities on the village green and football field. Whereas Ifold has limited more dispersed facilities; a village hall, Scout hut and golf course with clubhouse. In turn, this supports the economy and social welfare of our village amenities, and encourages their growth and regeneration.

The draft National Planning Policy Framework (NPPF) defines sustainable development as:

*'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning.'*

**5. QUESTION:** Why did the Parish Council not allocate the brownfield site at Little Springfield farm for development? Surely brownfield should be developed before greenfield sites?

**ANSWER:** The Steering Group and Parish Council would agree that brownfield should be developed before greenfield. It was the original intention of the Parish Council to allocate the brownfield site at Little Springfield Farm in The Plan for part of our housing allocation, however, this is not possible for several reasons:

- A *Site Options and Assessment* by an independent planning consultancy, AECOM, judged that insufficient regard had been given to the refusal of residential development at Appeal on the brownfield site; that it is not, in planning terms, in a sustainable location; and if the Parish Council proceeded with allocating it in the plan it would likely be rejected by the Inspector at examination. This conclusion was also supported by Colin Smith Planning (specialists engaged to assist in developing The Plan). View the two reports on this website: [www.plaistowandifoldparishnp.com](http://www.plaistowandifoldparishnp.com)

- The Plan must meet the identified Parish housing need and that includes an element of affordable housing. Sites of 10 houses or fewer are not required to deliver affordable housing on site, therefore the plan as drafted will deliver 11 houses, which must be located on one site to ensure this need is met. The brownfield site is not large enough to deliver 11 houses\*.

- \* The area alongside the stream is in flood zones 2 & 3 and a buffer was included next to the Ancient Woodland - so the actual building development area is considerably less. Sufficient green space is proposed around the site to lessen the impact on the countryside. The SHLAA notes Flooding, Drainage & Water Sources – *'Site is large enough to ensure no risk to dwellings provided development is restricted. The site would have a private access and private foul drainage, both not acceptable in affordable housing schemes.'*

- \* The site is located outside the Ifold settlement boundary.

- \* CDC currently object to any development on this site whatsoever.

To address these difficulties and to establish an alternative appropriate use for the site Policy EE4 has been proposed.

**6. QUESTION:** Why didn't the Parish Council concur with the CDC Draft Site Allocations DPD in regard to the site Land to the North of Little Springfield Farm, Ifold and put 11 houses there?

**ANSWER:** This site was noted in the CDC *Draft Site Allocations DPD* because at that time the Parish had not reached a stage of allocating a site in the Neighbourhood Plan. However, this site, due to its location, has since been found through consultation with Parish residents and technical advisors – AECOM and Colin Smith Planning – to be the least sustainable out of those considered. It is outside the Settlement Boundary separated by the physical barrier of Plaistow Road (40MPH speed zone) and is remote from Plaistow services. Therefore, it does not meet the current requirements for sustainable development as set out in the **NPPF** and the **Local Plan** and was discounted. In summary, the Parish Council considers the selection of this site by CDC fails to follow the necessary planning guidelines.

[N.B. For the avoidance of doubt: This site identified as 'Land to the North of Little Springfield Farm', is not Little Springfield Farm itself, nor does it relate to the Little Springfield Farm brownfield site.]

**7. QUESTION:** Why did the Parish Council not allocate the site at Foxbridge Golf Club? Part is designated brownfield and, more recently, outline planning permission has been sought for ten dwellings? If it has been discounted in the Plan, can there be any development on this site?

**ANSWER:** Only part of the proposed site might be considered brownfield and this is not large enough for our allocation of 10 units. This location is outside the Settlement boundary and is in the countryside to which local plan policies apply.

The site location is unsustainable in planning terms. CDC have confirmed that

*'the consideration of the proposed development at Foxbridge Golf Club should not be related to the allocation of the site in the neighbourhood plan which would be in addition to meeting the parish number of 10.'*

**8. QUESTION:** Why don't you extend the Ifold Settlement Boundary and put the houses there?

**ANSWER:** Through a 2016 survey conducted with all Parish residents, an extension to the Settlement Boundary was rejected by a majority and there is no mandate to make this provision in The Plan, nor is it being considered by Chichester District Council (CDC) through the local plan.

Currently there are insufficient facilities in Ifold that fulfill the criteria of sustainable development, which is necessary to meet national and local planning policies.

**9. QUESTION:** Why not develop the Football Field on the Northern outskirts of Plaistow rather than use the greenfield site in the heart of the village, adjacent to the conservation area?

**ANSWER:** This land is presently leased to the Plaistow Village Football club, it is an amenity, hence unsuitable. When the lease expires, only then could it possibly be considered for future development. It is proposed to allocate it in the NP as local green space, on the basis of recreational land, until 2029.

**10. QUESTION:** The recommended site, Land opposite the Plaistow village green in the Neighbourhood Plan is elevated and immediately adjacent to the Conservation Area in Plaistow, surely, one should not develop in such a sensitive location?

**ANSWER:** This has been a serious consideration which has been taken into account in the recommendations made by the Steering Group and the decisions taken by the Parish Council, guided by professional advice and addressed in the proposed NP policy H1. The main criteria, however, determining the selection of this site, has been the overriding question of sustainability, in the context of the core principle of planning. Development in or adjacent to a Conservation Area (CA) is permissible but regard must be given to the sensitivity of the CA. The elevation of the site will be a factor in determining the design at the Planning application stage.

**11. QUESTION:** The recommended site, in the Neighbourhood Plan is a large field. In the future, can there be further development in this field, over and above the 11 allocated dwellings? Or can this be securely ring fenced against additional, future development?

**ANSWER:** The question of limiting additional development in this location cannot be guaranteed. It would be subject to planning consent, in the normal manner. Plaistow remains in the countryside. Planned development can only occur if allocated in the Local Plan or Neighbourhood Plan.

**12. QUESTION:** Why don't you allocate 2 or 3 smaller sites instead of having all the houses in one place?

**ANSWER:** The Parish Council considered allocating 6 units, each on two sites, one in Ifold and one in Plaistow. However, The Plan must meet the identified Parish housing need and that includes an element of affordable housing. Sites of 10 houses or less are not required to deliver affordable housing on site, therefore The Plan as drafted will deliver 11 houses, which must be on the one site to ensure the need for affordable housing can be met.

**13. QUESTION:** Why doesn't Plaistow have a Settlement Boundary?

**ANSWER:** Historically none was allocated by CDC through the Local Plan.

**14. QUESTION:** New houses are being built all the time in Ifold – why don't they count towards the number that CDC have told us we must have?

**ANSWER:** Small developments of fewer than six houses are classified as *windfall* development which does not count toward our housing allocation. In recent years all development in Ifold has been 5 or less. Within the Ifold Settlement Boundary there is a presumption in favour of *unlimited windfall* development. The sustainability criteria for *windfall* development still applies but on a case by case basis, resulting in minimal requirements being enforced. In the long term the incremental development (a 46% increase in house numbers since 1990) has caused the Ifold settlement to suffer a significant shortfall in its infrastructure, rendering it more and more unsustainable, unlike planned development. CDC considers total *Windfall* numbers when determining how many houses need to be built in the District and when allocating to the parishes. This may explain why this Parish has a relatively small number of houses allocated (about 10 units) compared to neighbouring Parishes.

**15. QUESTION:** Does sustainability criteria mean all future planned development will only be in Plaistow?

**ANSWER:** No. The Plan is based on CDC's current Local Plan (2014-2029) and dictates an allocation of about 10 units for this Parish over this period. Plaistow has no Settlement Boundary, therefore there is no presumption in favour of development, and countryside policies apply. In the future, for any other allocations of housing, CDC will again base the numbers on local needs; and local and national planning policies at the time whilst also taking into account the views of the residents through the NP. There are also different criteria to consider for a site of, say, 100 houses compared to a site of 10.

**16. QUESTION:** Won't the extra traffic generated by 11 new houses on the selected site opposite Plaistow village Green make the road even more busy than it is now?

**ANSWER:** According to national planning policy, a development can only be unacceptable in transport terms if the effects of the development are judged by the Highways Authority to be severe. It is unlikely that 11 houses will have a severe impact on traffic and transport. Any development would have to go through a full planning application, at which point the Highway Authority would determine whether safe access can be provided. It should also be noted that one of the positive aspects in the choice of this site and the greater need for an increased element of sustainability, is the ability to walk to the services and facilities in the village, reducing the theoretical need to use a car.

**17. QUESTION:** How does the site Land opposite the Green fit into National Planning and Conservation Guidelines?

**ANSWER:** Development of the site must comply with planning policy. A planning balance must be made between policies. Development is not prohibited in Conservation Areas or adjacent to Grade II Listed buildings. But development must have regard to the sensitivities of the location and buildings. There have been no objections from any of the statutory consultees concerned, including Historic England and the Environment Agency.