

SDNPA's response to Plaistow & Ifold Submission NDP 2014-2029 (April 2020)

Thank you for consulting the South Downs National Park Authority (SDNPA) on the 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.

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
General	The progression of the Plaistow and Ifold Neighbourhood Development Plan (NDP) to submission stage is welcomed by the South Downs National Park Authority (SDNPA) and it is very clearly the result of a considerable amount of hard work by the Parish Council, steering group and volunteers.	N/A
General comment – reference made to consultation responses and influence of the SEA.	The justification provided to each Policy/ the background to the Aims within each chapter and the Objectives within the chapters appears to only touch on the work undertaken by focus groups, feedback information following various consultation exercises and events and other details such as Reg 14 responses that are crucial to the underpinning and support given to why certain policies are considered relevant to the Parish and therefore should be included within the NDP. In addition, little reference is made to the considerations and conclusions of the SEA that has informed the final version of the NDP and the policies within.	Provide greater context and narrative to the Aims, Objectives and Policies of the NDP, including reference to the SEA/SA.
Blue text	Some of the text within the NDP is in blue colour. Several of the blue words can be clicked on as they are hyperlinks and they take the reader to various other documents – the NPPF for example. Other blue text provides no hyperlink and merely highlights a Map number – for example. A suggestion is that different colours are used within the document for either a hyperlink or to highlight other information such as Maps.	Review text colouring.

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Paragraph 1.3	The reference to the West Sussex Minerals and Waste Plan should include the correct titles and adoption dates.	Amend text to state: <i>West Sussex Joint Minerals Local Plan adopted July 2018.</i> <i>West Sussex Waste Local Plan adopted April 2014.</i>
Paragraph 1.4	<p>It is noted that this paragraph states the following:</p> <p><i>It is the role of CDC to consult with the SDNPA at the submission stage of the Neighbourhood Plan (The Plan) as part of the consultation under Regulation 16 of the Neighbourhood Plan General Regulations 2012 (as amended).</i></p> <p>Whilst it is acknowledged that the Parish Council has responded accurately to our comments made at Reg 14 stage – it is not considered this statement is necessary to include within the actual text of the NDP.</p>	Please delete this paragraph.
Paragraph 1.15	Regulation 16 is the current stage of the NDP process. This paragraph is written in a future tense.	<p>Amend the paragraph so it is read in the present tense. Suggested text is</p> <p><i>The Plan is now at Regulation 16 stage and is currently undergoing a further consultation exercise, allowing the opportunity for parishioners, Statutory Bodies, and other interested parties to comment. Additional amendment to The Plan may be required before final Examination, and Referendum.</i></p>
Paragraph 2.9	We welcome the addition made to the aims and objectives with reference to our Reg14 comment. In addition, however, we would support reference to conserving and enhancing the part of the parish within the SDNP in line with the Purposes of the National Park Authority	<p>Amend text to read as follows:</p> <p><i>To conserve and enhance the natural beauty, wildlife and cultural heritage of the area of the Parish within the South Downs National Park</i></p>

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		<i>and to recognise the importance of the Parish in contributing to the setting of the National Park.</i>
Paragraph 2.23	The hyper link reference to CLPKP takes the reader to the whole of the Chichester Local Plan. It would be useful if the actual policy (Policy 5) was referred to or highlighted within the link	Include reference to Policy 5 of the Chichester Local Plan.
Paragraph 3.2	The acronym SDNPA should be referenced in full; with SDNPA placed in brackets – similar to that for Chichester District Council (CDC).	Amended text to read: <i>The remaining 12.11% lies within the South Downs National Park and the Local Authority is South Downs National Park Authority (SDNPA).</i>
Map 4	This map shows areas of the Conservation Area (CA) where it is proposed to extend the CA boundary. It is not clear from the text what the status of this proposal is and it could be misconstrued that the NDP is seeking to make these changes. It would be useful to provide a footnote as to the status of this review of the CA boundary and/or a planning committee report or CA report setting out how or when a decision is to be made. The reason it needs to be clear is that any future planning applicants need to be aware of the exact and approved CA boundary.	Include a reference or details as to the status of the extended/proposed extension of the CA boundary as shown on Map 4.
3.12 onwards – Social Characteristics/ Economic Characteristics	Where do the statistics come from?	Please include a reference and date as to where the statistics come from.
Paragraph 4.1 onwards	Are the Environment and Heritage objectives meant to be the same as those set out under paragraph 2.9 onwards? If so – these are not the same. If the two sets of objectives are meant to be different it may be useful to explain where these 5 points (para 4.1 to 4.5) derive from. This comment is relevant to all objectives set out under the chapter/policy sections	A suggestion is to clarify where the objectives under chapter 4 – Environment and Heritage come from and to consider this for all.
Policy EHI	Reference to the SDNPA Local Plan should read South Downs Local Plan policies	Please update reference to the South Downs Local Plan

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Paragraphs 4.13, 4.14 and Map 5	Paragraphs 4.13, 4.14 and Map 5 refer to ancient woodlands although Policy EH2 makes no specific reference to these assets. A suggestion is that this information may be better placed under the sub heading Policy EH3 – Protection of Trees, Woodlands and Natural Vegetation on page 17 as the Objective set out in paragraph 4.18 and Policy EH3 do make reference to ancient woodlands.	There may be some merit in re-jigging some of the justification relating to policies EH2 and EH3 so that matters relating to trees and ancient woodland are set out under the relevant policy headings.
Policy EH2	The policy refers to ‘such proposals should be accompanied by a Phase I Habitats Survey...’ We welcome the inclusion of the reference to Phase I Habitat Survey as outlined in our comments on the Reg 14 consultation response. However it would be useful to be clear within the policy as to what ‘such proposals’ mean.	Provide clarity for applicants as to when a Phase I habitat Survey is required.
Policy EH4	Reference is made to Greenbelt policy within EH4 but no further information is given.	Consider referencing the relevant paragraph in the NPPF – in terms of the paragraph number so that the reader is clear what the Greenbelt policy is. Example of the amended text could be: <i>Local policy for managing development within a Local Green Space should be consistent with those for Green Belts as set out in paragraphs 143-147 of the NPPF 2019.</i>
Paragraph 4.30 Paragraphs 4.31 and 4.32	This doesn't quite make sense and wonder if it has been left over from a previous version of the NDP? Formatting between 4.31 and 4.32 needs attention to the spacing between paragraphs.	Review the text and formatting.
Policy EH5	The third section of the policy starting with the sentence – ‘proposals where the provision of external lighting is demonstrated to be necessary’ is not entirely clear as to what policy guidance it is providing. The reference to ‘sports facility’ is confusing.	Consider a review of policy wording to ensure there is clarity to the policy guidance it is providing to applicants.
Paragraphs 4.46 and 4.47	These repeat paragraph 4.38 and 4.39. Is it necessary to have the same text and justification repeated twice in the Plan but for separate policies?	Review the justification text for Policies EH5 and EH6.

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Policy EH6	Consideration should be given to whether this policy is necessary as a separate policy, and whether it could be included as part of Policy EH5	Consider whether this policy could be included as a part of Policy EH5
Policy numbers – Community Infrastructure	Policy numbers within the Community Infrastructure chapter include a Capital C and a lower case i (eg Policy Ci2) – whereas policy numbers within the Environment and Heritage chapter include a Capital E and Capital H (eg Policy EH1). This may be deliberate but in case not – we have included it in our comments.	To review policy numbers and letters
Page 31	Conformity reference to Policy Ci1 – please consider if there is a relevant policy within the South Downs Local Plan to include here. Suggestions are: Strategic Policy SD17: Protection of the Water Environment Strategic Policy SD49: Flood Risk Management Development Management Policy SD50: Sustainable Drainage Systems	Include reference to relevant policies within the South Downs Local Plan
Policy H1	The policy states that development must meet the identified Parish Housing Need of small 1, 2 or 3 bedroom units, with some accommodation suitable for older residents. There appears to be no evidence set out clearly in the justification accompanying this policy that illustrates why there is a need for such housing in the Parish. The policy currently requires the removal of all permitted development rights, however there appears to be no evidence or justification to support this requirement. The policy make no reference to a policies map. There is no reference to affordable housing.	Consider providing further justification to the policy and reconsider some of the provisions within the actual policy.
Justification to Policy H1	There is no detail within the justification as to why this site is suitable for allocation. There is information as to why other sites could not be allocated but no details on the allocated site. No reference has been made to the results of the SEA in regard to the site and/or public consultation feedback s	Provide further justification.
Policy H2	It is recommended that reference is made to access and parking or Policy H4 is referenced within Policy H2 to ensure the provision of H4 are taken into account. .	Consider including a reference to access and parking.

Ref	Comment	SDNPA Recommendation
Policy EE4	As this is an allocation and a policy referring to a specific site – it is recommended that the name of the policy is changed to refer to the site name so it is clear where the policy refers to and readers can quickly find the policy within the NDP. In addition – reference should be made within the policy to the policies map which identifies the location and boundary of the site.	It is recommended the title of the policy is changed to <i>Policy EE4 Land at Little Springfield Farm, Ifold</i>
Strategic Environmental Assessment / Sustainability Appraisal		
SA/SEA	The Environmental Report includes an assessment of the reasonable alternatives which have been identified. Currently the reasonable alternatives tested include options relating to the location of development. This is one approach to the testing of reasonable alternatives, another approach considers all sites identified by the NDP for potential development and testing these as 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 approach to assessing reasonable alternatives in the SEA/SA