

ID	STATUTORY CONSULTEE	PARA NO.	POLICY REF.	PAGE NO.	REPRESENTATION COMMENT(S)	RESPONSE / JUSTIFICATION	AMENDMENT (if required)
1	Chichester District Council (CDC)	Not specified	EE4	28	The Parish Council and Neighbourhood Plan Working Group should be commended for the hard work that has been put in to this plan to date. The Council recognizes that there have been a number of challenges for the NP group to address as work has progressed to this stage.	No change.	No change required.
2	CDC		Introduction	3	This section will require ongoing updating as the draft NP is progressed.	Amend.	<p>This section has been updated to reflect the current situation. CHANGE TO:</p> <p>The CDC Site Allocations Preferred Approach Development Plan Document (SA DPD) is intended to deliver the housing numbers and employment as set out in the adopted CLPKP. The SA DPD identifies that Plaistow &amp; Ifold Parish should deliver an indicative housing number of 10 units to meet the identified housing requirement on a site: Land to the North of Little Springfield Farm F1 which is contrary to the site allocated in this Neighbourhood Plan. The SA DPD was the subject of a public examination in September 2017.</p> <p>The planning consultancy, AECOM (appointed by Locality, a partner organization of the Ministry of Housing, Communities and Local Government - MHCLG) conducted a Site Options and Assessment (August 2016) of the proposed housing sites, to be considered for inclusion in the Neighbourhood Plan. Their study concluded that the CDC SA DPD site had a high probability of being considered less sustainable in terms of national planning policy at Examination, than the alternative sites in Plaistow, given there are no services and facilities in the Ifold settlement. As a result, the findings of the Site Options and Assessment were brought to the attention of CDC by the Parish Council in September 2016, with a view to CDC revising their allocated site for development. The Parish Council made representations against the soundness of the CDC SA DPD site allocation for this Parish in the September 2017 public examination. The Parish Council considers that Policy H1 in this Neighbourhood Plan, allocates a site that best meets sustainability criteria in this Parish.</p>

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3	CDC	1.2		3	Makes various references to a hall, scout/girl guide HQ and a church hall, however in paragraph 5.22 under AIM – Ci4 there is only reference to the Holy Trinity Church. It is suggested that this should also include Kelsey Hall, Winterton Hall (referenced in paragraph 3.7 on Page 7), the Youth Club and any other important community buildings (see also the wording of 5.1 objectives, 5.20, 5.21 and 5.22 for consistency of approach).	Amend. Update Aim Ci4, 5.20, 5.21, 5.22	<p>Community Infrastructure - Objectives: CHANGE FROM: to retain buildings such as Holy Trinity Church that are a focal point for the community and allow opportunities for meeting and interaction. CHANGE TO: to retain buildings such as Holy Trinity Church, Ifold Scout Girl Guide HQ, Kelsey Hall, Plaistow Youth Club and Winterton Hall, that are focal points for the community and allow opportunities for meeting and interaction.</p> <p>5.20, 5.21, 5.22 CHANGE FROM: AIM Ci4 Holy Trinity Church, Plaistow is a Chapel of Ease rebuilt in its present stone form after the original wooden structure was destroyed by a fire in 1850. The Church is an important focal point for Plaistow village both for its visual presence and central location; as well as for providing the religious and community well-being of parishioners of all four settlements. OBJECTIVE: to retain buildings that are a focal point for the community and allow opportunities for meeting and interaction. AIM – Ci 4 The Parish will support sensitive internal reordering of Holy Trinity Church, to ensure the ongoing function and viability of the building and its valued place in the community for the diocese and future generations.</p> <p>CHANGE TO: AIM Ci4 – HOLY TRINITY CHURCH AND OTHER COMMUNITY BUILDINGS</p>

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4	CDC	1.3				Amend.	<p>Holy Trinity Church, Plaistow is a Chapel of Ease rebuilt in its present stone form after the original wooden structure was destroyed by a fire in 1850. The Church is an important focal point for Plaistow village both for its visual presence and central location; as well as for providing the religious and community well-being of parishioners of all four settlements.</p> <p>The Ifold Scout - Girl Guide HQ, Kelsey Hall, Plaistow Youth Club and Winterton Hall are also community buildings that allow opportunities for meeting and interaction.</p> <p>OBJECTIVE: to retain buildings that are a focal point for the community and allow opportunities for meeting and interaction.</p> <p><b>AIM – Ci 4: HOLY TRINITY CHURCH AND OTHER COMMUNITY BUILDINGS</b></p> <p>The Parish will support sensitive internal reordering of Holy Trinity Church, to ensure their ongoing function and viability of the building and their valued place in the community for the diocese and future generations.</p> <p>The Parish will also support and consider favourably future plans to ensure the ongoing functions of the Ifold Scout - Girl Guide HQ, Kelsey Hall, Plaistow Youth Club and Winterton Hall as valued community buildings to allow continued opportunities for meeting and social interaction.</p>
	CDC				Currently the development plan also includes the saved policies from the Chichester Local Plan – First Review (April 1999) for the South Downs National Park Authority (SDNPA) area	Amend Introduction.	CHANGE TO: The Parish Council can only draft planning policies that are in general conformity with the development plan for the area - which currently consists of the Chichester Local Plan Key Policies 2014 to 2029 (CLPKP), adopted in 2015; the SDNPA Pre-Submission South Downs Local Plan; the West Sussex Minerals and Waste Plan; and the National Planning Policy Framework (NPPF).

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5	CDC	4.2-4.5	EH1	9	The policy may benefit from some minor rewording to improve its readability.	Amend.	<p>ENVIRONMENT AND HERITAGE</p> <p>OBJECTIVES - CHANGE FROM: to protect the area's valuable heritage and historic assets;</p> <p>CHANGE TO: to protect the area's valuable heritage and historic assets (designated and non-designated) as identified in Appendices 2 and 3;</p> <p>CHANGE FROM: To protect the area's valuable heritage and historic assets.</p> <p>CHANGE TO: To protect the area's valuable heritage and historic assets (designated and non-designated).</p> <p>Justification CHANGE FROM: The Parish has more than 40 Grade II</p> <p>CHANGE TO: The Parish has more than 80 Grade II</p> <p>Amend Policy EH1: Development proposals within the boundary of, or within the setting of heritage assets (both designated and non-designated) will be encouraged in the Parish where it is demonstrated that such development will not adversely impact upon the unique character, heritage or setting of the heritage asset and is not in conflict with the CLPKP, SDNPA Local Plan policies, the Plaistow Conservation Area Character Appraisal and Management Proposals (May 2013) and or the requirements as set out in this Neighbourhood Plan.</p>
6	CDC		EH2	9-10	It is suggested that the wording may be improved if the policy (along with others) was worded in a more positive way in accordance with guidance throughout the NPPF (including paragraph 16).	Amend.	The policy has been reworded according to CDC and SDNPA comments.
6	CDC		EH2	9-10	It is not clear what is meant by 'rural areas'; is the intention that this includes all areas outside a settlement boundary?	Amend.	Rural areas has been removed as this policy relates to the whole of the Parish.
6	CDC		EH2	9-10	4th bullet point – the inclusion of the word 'trees' is considered to be too broad, suggest that the sentence is finished after using the example of Ancient Woodland.	Amend.	This has been removed as it is covered in Policy EH3.
6	CDC		EH2	9-10	Last paragraph (line 3) it is suggested that Arboricultural Impact Assessment should be replaced with Phase I Habitats survey and any required subsequent surveys as this more appropriately relates to this policy concerning the wider Natural Environment. The issues concerning trees are better addressed via Policy EH3 (Protection of Trees, Woodland and Natural Vegetation).	Amend.	<p>CHANGE FROM: an Arboricultural Impact Assessment (AIA) that</p> <p>CHANGE TO: a Phase 1 Habitats survey and any required subsequent surveys, that</p> <p>Refer to response to Comment ID: 26 and 43.</p>

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7	CDC		EH4	12	<p>The first paragraph refers to the policies map but no map is included in the document. If a separate map is to be included showing the various sites this should be referenced and the boundaries of each site clearly identified.</p> <p>The text at the end of the policy may not be necessary as the designation itself affords protection as set out in the NPPF.</p>	Amend.	<p>CHANGE FROM: as shown on the Policies Map. CHANGE TO: as shown on Maps 4, 5 and 6:</p> <p>Insert LGS Map 4 – Ifold; Map 5 – Plaistow and Map 6 – Shillinglee.</p> <p>Insert appendices – individual assessment sheets for each LGS.</p> <p>Delete para 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)</p>
7	CDC		EH4	12	It is suggested that the local green spaces proposed are checked against the criteria set out in the NPPF as not all of those currently included appear to meet these requirements. For example the inclusion of a single tree does not appear to have sufficient justification for such an area designation. In addition some of the areas may already be sufficiently protected by their use as open space.	No change.	<p>This has been done. Refer to individual assessment sheets for each LGS proposed for designation. Inserted as Appendix 4 – Local Green Space Assessments.</p> <p>Regarding inclusion of a single tree (LGSi9) refer to the response to Comment ID: 26. LGSi9 has historic value.</p>
8	CDC		EH5	13	Final bullet – would this criterion also include lighting that may be required in for example a courtyard for guidance or security purposes?	Amend.	Refer to Comment ID: 47.
9	CDC		EH6	14	Suggest the inclusion of additional text along the lines of ‘...unless required for highway safety or security.’	Amend.	<p>Policy EH6: The provision of street lighting will not be permitted unless it can be demonstrated there are exceptional circumstances required for highway safety by the Local Highway Authority.</p>
10	CDC		Aims	14	this section may be better located along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan. This would be easier for people to find.	Amend.	<p>The Parish Council have considered this and felt that the AIMS relate best when following the section and relevant policies and justification.</p> <p>A definition of what an AIM is has been inserted into the Introduction.</p> <p>AIMs inserted into the Table of Contents.</p>

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11	CDC		CH5 [Ci5]	15	This section would benefit from reference to Community Assets, particularly as the Village Shop is on the register.	Amend. A list of the Parish community assets is missing these need to be noted along with highlighting those assets that are also on the CDC community asset register for this Parish	Refer to response to Comment ID: 3.  Note all the community buildings: Plaistow: Church; shop; pub; primary school; Winterton Hall; Winterton Hall – Youth Club; Winterton Hall. In Ifold: Kelsey Hall; and Scout Girl Guide Hut.  Recreation assets have been identified under local green spaces Policy EH4.
12	CDC		Ci1 [Ci1]	16	Second para of 5.6 - it would be more accurate to refer to Flood Zones 2 and 3 rather than to use the wording 'high and moderate risk'. Also the exception test is not always required and therefore it is suggested the wording is amended to read '...by the Sequential and Exceptions test, <b>where relevant in accordance with the NPPF requirements.</b> '	Amend. Correct the terminology in Policy Ci1.	Amend Para 5.5 to note Flood Zones 2 & 3.  Policy Ci1. CHANGE FROM: within areas of high or moderate flood risk as defined CHANGE TO: within Flood Zone 2 or 3 areas, as defined  CHANGE FROM: unless justified by the Sequential and Exceptions Test. CHANGE TO: unless justified by the Sequential and Exceptions Test, where relevant in accordance with the NPPF requirements.
13	CDC		Ci Aims [Ci]	18	Again, this section may be better located along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan. This would be easier for people to find.	No change.	No change required. The Steering Group believes it provides clarity and ease of reference having AIMS sited at end of relevant sections in The Plan but will also include the AIMS in the Table of Contents.

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14	CDC	6.5 6.8	H1	19	<p>1. Amend wording to refer to a <i>minimum</i> of 11 units to be in accordance with the adopted Chichester Local Plan: Key Policies 2014-2029.</p> <p>2. The use of the word ‘bespoke’ is likely to be too restrictive, suggest some minor re-wording.</p> <p>3. In order to make the policy more flexible if circumstances change it is suggested that the following wording “unless robust evidence can justify an alternative mix” be added to the end of the following statement “meets the identified Parish Housing Need of small 1, 2 or 3 bedroom units, with some accommodation suitable for older residents”.</p> <p>4. Last bullet point – suggest that the reference should be to the whole Village Design Statement and, in particular, the section on Plaistow; as written the remainder of the document would be diluted and not necessarily relevant.</p>	<p>Amend.</p> <ol style="list-style-type: none"> <li>1. Use adopted Local Plan terminology, ‘indicative housing number’</li> <li>2. No change</li> <li>3. Amend para 6.8</li> <li>4. Amend para 6.8</li> </ol>	<p>Reference made to CLPKP wording re: indicative housing allocation.</p> <p>Amended para 6.5 first objective: From: to meet the District Council’s housing allocation of about 10 dwellings To: to meet the CLPKP indicative housing number of 10 dwellings</p> <p>From: of up to 11 units To: of 11 units</p> <p>2. Due to the sensitivity of the site the Parish Council prefers emphasis remains on bespoke design to reflect the existing village vernacular.</p> <p>3. Amended as per CDC recommendation.</p> <p>4 10th bullet point CHANGE FROM: to meet identified housing need for smaller dwellings; CHANGE TO: to meet identified housing need for smaller dwellings (unless the Parish housing need has changed);</p> <p>11th bullet point: CHANGE FROM: emerging Village Design Statement: Plaistow section. CHANGE TO: emerging Plaistow &amp; Ifold Parish - Village Design Statement.</p> <p>Policy H1 - Insert a 12th bullet point to address site elevation. Will address the site elevation, and <i>sympathetically landscape to mitigate the impact on the surrounding area.</i></p>
15	CDC		H3	23	<p>It is suggested that reference is made to CDC’s development plan regarding the affordable housing provision requirement.</p> <p>The following sentence should be removed as it is contrary to CDC’s Allocation Scheme “Priority will be given to those people with a local connection to this Parish or neighbouring Parishes”.</p>	<p>Amend.</p>	<p>The Local Plan does not define how affordable housing should be allocated other than for rural exception sites (Policy 35) which this Plan does not propose.</p> <p>CHANGE FROM: Priority will be given to those people with a local connection to this Parish or neighbouring Parishes. CHANGE TO: Priority will first be given to those people with a local connection to this Parish or neighbouring Parishes. Justification: Providing affordable housing to people with a local connection will promote an inclusive community and retain important local social connections.</p>

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16	CDC		H4	24	<p>4th bullet point – the reference should be to West Sussex County Council car parking standards; justification and evidence will be needed for these to be considered as minimum standards.</p> <p>1st bullet point – it is not clear where the densities are set out as this is not indicated or referenced. Should the reference be to Policy H4?</p>	<p>Amend.</p> <p>1. Reference 6.2 densities for Ifold</p>	<p>CHANGE FROM: off street car-parking is provided in accordance with currently adopted Chichester District Council car parking standards</p> <p>CHANGE TO: off street car-parking is provided in accordance with currently adopted West Sussex County Council car parking standards,</p> <p>Insert to Conformity Reference: WSSC - Revised County Parking Standards and Transport Contributions Methodology (Supplementary Planning Guidance)</p> <p>Amend justification to Policy H4.</p> <p>Policy H4 - 1<sup>st</sup> Bullet Point CHANGE TO: it is of a density which is in keeping with the existing density in the surrounding area;</p>
17	CDC		EE1	25	<p>Is the aim of this policy to deliver live/work units per se or to support working at home more widely?</p> <p>Question if there is sufficient evidence of demand to support live/work units. Other than the census figures showing that 10.7% of the economically active work from home in the area, what other justification does the NP group have for live/work units?</p> <p>Also it is not clear when the information to assess the business would be requested. For example, at planning application stage it may be the case that it would be too early in the development of the business to know the number of staff employed and/or vehicle movements etc.</p> <p>The inclusion of the criterion referring to 'personal permissions' would be contrary to government guidance in the NPPG.</p> <p>In addition what is meant by vehicle movements and how would this relate to hours of work? This is likely to be unenforceable.</p>	<p>Amend.</p>	<p>Policy EE1 Live/Work Facilities amended</p> <p>The use of dwellings as live/work units will be supported, where the need arises, in order to encourage local businesses. However, the business use, proposed at the Planning Application stage, will be carefully assessed to ensure that there will be no harm to the character of the area or the amenities of adjoining properties, particularly in relation to increased noise and disturbance. In order to maintain control, it may be necessary to impose conditions relating to the following matters:</p> <ul style="list-style-type: none"> <li>• Hours of work / operation of the business;</li> <li>• Numbers of staff employed employed by the business;</li> <li>• Amount of floor space / rooms to be given over to the business function;</li> <li>• Vehicle movements and tonnage of vehicles relating to the business operation;</li> <li>• External lighting.</li> </ul>



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18	CDC	7.9, 7.10		27	Should the objective in para 7.9 also refer to equine facilities to be consistent with para 7.10?	Amend.	Policy EE2 objective amended.  To avoid the loss of existing employment floor space and to support the expansion of existing businesses, new commercial activity, agriculture and equine businesses, where the character of the local area, existing agricultural land and the amenities of local residents are not significantly harmed.  Conformity reference to note CLPKP Policy 55.
19	CDC		EE2	27	Generally support this policy although it could be improved by including reference to Chichester Local Plan: Key Policies Appendix E. Appropriate Marketing Guidance. This gives an indication as to what evidence will be required to show that adequate marketing has been carried out. Currently the NP does not give any guidance on this point. Para 3 – there needs to be a clear definition of what is meant by rural based activities, what is included?	Amend.	Policy EE3 amended.
20	CDC		EE3	27	The protection of retail uses is supported. However, currently as worded there is no indication as to how/when such a loss or alternative use is to be considered. Currently this is not included in the policy. It is suggested that it may be beneficial to link this to the need for evidence from a marketing scheme to be required in any such circumstances (for instance as suggested with Policy EE2 above).	Amend.	Policy EE3 amended.
21	CDC		EE4	28	Object to the inclusion of this site as it is physically and visually separated and divorced from the settlement. In addition there are concerns about the viability and deliverability of the various uses proposed. Its inclusion provides an inconsistent approach to development in terms of neighbourhood plan proposals in the LPA area. There is no map to show the site and the site has not been considered as part of the SEA process which is regarded as a serious procedural omission.	Amend.  The Parish Council representatives met with CDC Planning to discuss the Brownfield policy.	Policy EE4 has been amended according to discussions with CDC and Reg 14 Comments received - to note the proposed use of the site for a mixed use is subject to viability studies.  Insert map of Brownfield Site.  The SEA is being amended to reflect The Plan amendments (post Reg 14). The inclusion of this site is noted in the justification for the policy.
22	CDC		T1	30	The reference should be to West Sussex County Council car parking standards; justification and evidence will be needed for these to be minimum standards. Second para would benefit from the inclusion of reference to 'refuse vehicles'.	Amend.	Reference WSCC car parking standards.

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23	CDC		Aims	31-32	As above, this section may be better included as part of a wider section along with other aims and aspirations as a whole single dedicated section towards the end of the neighbourhood plan.	No change.	Refer to response to Comment 10.
24	CDC	Not specified			<p>Monitoring - There is no indication or section to show how the neighbourhood plan and its policies will be monitored and delivered. This may require some further consideration and inclusion prior to the submission of the draft plan.</p> <p><b>Exercise of Delegated Authority - Head of Planning Services</b>  I hereby exercise my delegated power in accordance with Chichester District Council's Constitution: 'to make formal comments on a draft Neighbourhood Plan at Pre-Submission stage and Submission stage' AND DETERMINE THAT, the above comments are the formal response made by Chichester District Council on the <b>pre submission stage</b> of the <b>Plaistow and Ifold Parish Neighbourhood Plan</b> in relation to comments made under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended by The Neighbourhood Planning (General) (Amendment) Regulations 2015).  Signed: Andrew Frost <b>Head of Planning Services</b></p>	Amend. Insert an Action Plan in the Appendices.	Plan amended to include section on monitoring and delivery of key policies and AIMS.

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24	Southern Water	Not specified		15	<p>We welcome the opportunity to comment on the above version of the Plaistow and Ifold Neighbourhood Plan.</p> <p>We note that one site of 11 new dwellings is proposed within the Neighbourhood Plan area. Please find following our response in respect of specific policies.</p> <p>It should be noted that Ofwat, the water industry's economic regulator, takes the view that local infrastructure, such as site specific sewers required to serve individual housing development sites, should be delivered by the development. To this end, the principle is that new development needs to connect to the sewerage systems at the nearest points of adequate capacity. This may require off-site infrastructure if the nearest point is not located within the immediate vicinity of the site.</p> <p>Strategic infrastructure, such as extensions to wastewater treatment works, may be required to accommodate new development within a wastewater catchment as a whole, and this is planned and funded through the water industry's 5 yearly price review process. This process does not require involvement from developers, other than a potential need to coordinate delivery.</p> <p>We hope that you will find this response useful and that it will be taken into account in the next version of your Neighbourhood Plan.</p> <p>We would be grateful to be kept informed of future progress.</p>	Amend.	This information has been added to the justification of Policy Ci1 – Reducing and Avoiding Flood Risk.

25	Southern Water		C11 [C11]	<p>15</p> <p>We support the requirement in Policy C11 for all new development to provide for adequate foul drainage capacity.</p> <p>However, we note the comments under "Justification" (section 5.4) and have investigated the incidents of effluent discharges reported to Southern Water over the last 5 years. Based on our customer service management system records from 2013-2017, the number of hydraulic overload incidents reported to Southern Water have not significantly increased, however we do appreciate that the number of reported incidents may not accurately reflect what is happening on the ground. We would also point out that we are not the authority responsible for surface water flooding, and that the relevant authority would be dependent on the source of flooding (eg rivers, ditches or blocked highways drains).</p> <p>We would therefore suggest that the following amendments are made to the section, in order to more accurately reflect the situation regarding surface and foul water drainage in the area:</p> <p>"The surface and foul water drainage systems serving the residential parish communities of Durfold Wood, Plaistow and Shillinglee operate reasonably well, with only a few isolated locations of surface-water flooding on low lying roads during periods of extensive rainfall.</p> <p>However, Ifold is not so well served because it located further down the catchment and therefore takes all the foul drainage from the other settlements of Durfold Wood and Plaistow passes through before transferring to the Brewhurst Mill pumping station in Loxwood. There have been frequent occurrences of surface water flooding together with occasional effluent discharge from sewage access chambers during episodes of prolonged and high levels of rainfall. Whilst Ifold's sewer system has suffered problems from its initial installation (on or around 1965), the periods of effluent discharge and flooding have considerably increased over</p>	Amend.	<p>Community &amp; Infrastructure</p> <p>The Justification has been amended.</p> <p>Refer to response to Comment ID:12.</p>
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					recent years <i>which may be due</i> to excessive 'windfall' development within the Settlement Boundary and without appropriate amendment to the sewer infrastructure both within Plaistow & Ifold Parish but also in Loxwood Parish which hosts the Brewhurst Mill pumping station and also receives effluent from Alfold Parish in Surrey."		

25	Southern Water		CI1	<p>15</p> <p><b>Additional policy on the provision of water and wastewater infrastructure</b>  Southern Water is the statutory water and wastewater undertaker for Plaistow and Ifold and as such has a statutory duty to serve new development within the parish.</p> <p>Whilst only one site of 11 new dwellings is proposed for the Plaistow and Ifold Neighbourhood Plan area over the next 15 years, it is possible that we will need to provide new or improved infrastructure over the Plan period either to serve new development and/or to meet stricter environmental standards.</p> <p>It is important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.</p> <p>We could find no policies that explicitly support the provision of new or improved infrastructure. One of the core planning principles contained in paragraph 17 of the NPPF is to <i>‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’</i>. Also the National Planning Practice Guidance states that <i>‘Adequate water and wastewater infrastructure is needed to support sustainable development’</i>.</p> <p>Although the Parish Council is not the planning authority in relation to water or wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.</p> <p><b>Proposed amendment</b>  To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows, which can be inserted at the end of Policy CI1 - Reducing and Avoiding Flood Risk (page 16):  <i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan</i></p>	Amend.	Policy CI 1 amended according to the Southern Water proposed amendment.
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26	Historic England	2.1		5	<p>Thank you for your e-mail of 7<sup>th</sup> September advising Historic England of the consultation on your Neighbourhood Plan. We are pleased to make the following general and detailed comments.</p> <p>The nature of the locally-led neighbourhood plan process is that the community itself should determine its own agenda based on the issues about which it is concerned. At the same time, as a national organisation able increasingly to draw upon our experiences of neighbourhood planning exercises across the country, our input can help communities reflect upon the special (heritage) qualities which define their area to best achieve aims and objectives for the historic environment. To this end information on our website might be of assistance – the appendix to this letter contains links to this website and to a range of potentially useful other websites.</p> <p>We welcome, in principle, “respecting the character” in the Vision but would like to see a specific reference to a “conserved and enhanced historic environment”. We welcome the reference to built heritage in paragraph 2.1, but we would prefer “historic environment” to reflect the fact that not all historic features are built. We welcome the first objective in paragraph 2.3 and the fourth objective in paragraph 2.5.</p>	Amend.	Vision bullet point has been amended accordingly.
26	Historic England	3.4-3.9		5	<p>We welcome the descriptions of the historical development of the settlements in the parish in paragraphs 3.4 – 3.9. However, we feel that it could say a little more about the early development of the settlements and the parish as a whole, with reference to the West Sussex Historic Landscape Character Assessment and the Chichester Historic Environment Record.</p>	No change.	The emerging Plaistow & Ifold Parish - Village Design Statement includes considerable detail on the Historic Environment.

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26	Historic England				There is also a lot of information in the Plaistow Conservation Area Character Appraisal, including reference to the remains of hammerponds in the valleys and other remains relating to the medieval iron industry, namely iron workings and lime kilns. The Appraisal also refers to the remains of twelve separate glassworks being also recorded in the area. All of these help give a sense of place for the parish and the settlements therein.	Amend.	We have amended conformity references throughout to note the importance of the Plaistow Conservation Area Character Appraisal.  The emerging Plaistow & Ifold Parish - Village Design Statement also includes considerable reference.
26	Historic England				The National Planning Practice Guidance states “... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions”.	No change.	No change required.  The emerging Plaistow & Ifold Parish - Village Design Statement also includes considerable reference.
26	Historic England				According to our records, the parish has 62 listed buildings, including the Grade II* Shillinglee Court, one scheduled monument (the site of the Wephurst Glass House, one of the twelve glassworks to which the Conservation Area Character Appraisal refers) and the Plaistow Conservation Area. There is little information on the scheduling description for the Glass House so it would be interesting to “Enrich the List”; <a href="https://www.historicengland.org.uk/listing/enrich-the-list/">https://www.historicengland.org.uk/listing/enrich-the-list/</a> by undertaking research into its history.	Amend.	The Appendices have been included all the listed and non-designated buildings.
26	Historic England				It would be helpful to say a little more about the conservation area; e.g. when it was designated, if the designation has been reviewed, what its special interest (the reason for designation) is, and the fact that there is a character appraisal and management plan for the area.	Amend.	Amend section on Plaistow to note Conservation Area was reviewed in 2013.
26	Historic England				Is there a list of locally-important buildings and features ? Non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity.	No change.	Yes. See Appendices.



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26	Historic England				Is the condition of heritage assets in the parish an issue ? Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include grade II buildings outside London. Has there been a survey of the condition of grade II buildings in the Plan area or has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?	No change.	No heritage assets are at risk. A survey on building conditions has not been undertaken.  The Plan seeks to ensure against inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks through Policy EH1, EH2, EH3, EH5, EH6 and proposed LGS designations.  The emerging Village Design Statement will provide greater detail to support The Plan and inform landowners and developers.
26	Historic England		EH1		We welcome, in principle, Policy EH1, although we would welcome clarification within the policy that harm (even if minimised) to a heritage asset will only be allowed in exceptional circumstances where there is clear and convincing justification and the development is necessary to achieve public benefits that outweigh the harm, in accordance with paragraphs 132, 133 and 134 of the National Planning Policy Framework.	Amend.	Amend Conformity References to add in paras 132, 133 and 134. Note NPPF in Policy EH1.
26	Historic England		EH2	10	The fourth and fifth insets of Policy EH2 rather duplicate each other. We would welcome the addition of “results in the loss of historic landscape features” as another inset.	Amend.	Policy EH2 Amended. Refer to response to Comment ID: 6.
26	Historic England		EH3		We would also welcome the addition of “historic” after “landscape” in the first sentence of Policy EH3.	Amend.	Policy EH3 Amended. Development that results in the loss of trees of good arboricultural, significant landscape, historic or amenity value, either individually or as a group, will be resisted.  Refer also to Comment ID: 6 and 43.
26	Historic England		EH4		We welcome Policy EH4 as some of the Local Green Spaces identified are of historic significance.	Amend.	Policy EH4 Amended. Refer to response to Comment ID: 7.

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26	Historic England		EH4, EH5, EH6		<p>We welcome, in principle, Policy EH5 for its recognition that excessive or poorly-designed lighting may adversely affect the special interest, character or appearance of historic buildings and/or the conservation area.</p> <p>However, it (and Policies EH4 and EH6) might need a little rewording to ensure that they conform with the requirement for planning policies in paragraph 154 of the National Planning Policy Framework that “Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan”.</p>	<p>Amend. Reference NPPF para 154 - <i>Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.</i></p>	<p>Policy EH4 Amended. Refer to response to Comment ID: 7, 8 and 26.</p> <p>EH6 - Refer to Comment ID: 9.</p>
26	Historic England		H1	5	<p>The proposed housing site allocation at Land Opposite The Green is within the setting of the conservation area and there are a number of listed buildings within the wider vicinity.</p> <p>However, the site’s exclusion from the conservation area suggests that it does not make a significant contribution to the special interest, character or appearance of the area (unlike The Green itself and the fields to the north-east of the village).</p>	No change.	No change required.
26	Historic England		H1	5	<p>We note that it is not identified in the Conservation Area Character Appraisal as making any particular contribution to the setting of the conservation area with no important views identified to, from or over the site (except one view from the east), probably due to the vegetation along the southern boundary of The Green which would be unaffected by the development of this site.</p>	No change.	No change required.

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26	Historic England		H1	5	<p>The Strategic Environmental Assessment notes that the “<i>site is currently well screened and relatively enclosed</i>”, but that “<i>development has the potential to affect the setting of the conservation area and listed building</i>”, and rather unhelpfully considers that the impact of the development of this site on the historic environment is “<i>uncertain</i>”.</p> <p>However, given the lack of reference to the site in the Conservation Area Character Appraisal, it would appear to us that the development of the site need not have any significant adverse impact on the special interest, character or appearance of the conservation area.</p>	No change.	No change required.
26	Historic England		H1	5	<p>The site is at a higher level than Rickman’s Lane and therefore development on the site could potentially be very visible (notwithstanding the SEA’s consideration that the site is “<i>well screened and relatively enclosed</i>”). However, this is more a landscape than a historic environment issue, although we agree with the SEA that the development of this site would affect the setting of Stone House to the west.</p>	Amend.	Policy H1 has been amended to address site elevation.
26	Historic England			5	<p>In accordance with Section 66 of the <i>Planning (Listed Buildings and Conservation Areas) Act 1991</i>, special regard has to be had to the desirability of preserving the setting of listed buildings. However, in our opinion, the site is large enough to accommodate 11 dwellings and to incorporate mitigation measures to reduce the impact on Stone House, as required by Policy H1. Also we do not consider that the site in its present open, undeveloped, state contributes particularly to the significance of Stone House.</p>	No Change.	No change required.

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26	Historic England	Section 6		19	Overall, therefore, subject to careful attention to design, layout and boundary treatment, we consider that the development of the proposed site Land Opposite The Green need not have an unacceptable impact on nearby designated heritage assets. We would, however, defer to the opinion of Chichester District Council's Conservation Officer, who is likely to know the site and Plaistow better than ourselves and who should be consulted on this proposed allocation if s/he has not already.	No Change.	No change required.
26	Historic England	Section 6		19	Also, the assessment above has only considered designated heritage assets. Has the site been assessed for any non-designated archaeological interest with reference to the Historic Environment Record. Chichester District Council's Archaeologist should be consulted.	Amend. Reference the CDC HER search undertaken of the site and surrounds	Reference the CDC HER search undertaken 30 Jan 2017 of the site and surrounds in the evidence base. <a href="https://plaistowandifoldparishnp.files.wordpress.com/2017/02/cdc-her-search-30jan2017.pdf">https://plaistowandifoldparishnp.files.wordpress.com/2017/02/cdc-her-search-30jan2017.pdf</a>
26	Historic England	Section 6		21-22	We welcome the requirement in Policy H2 that (re)development proposals within the Settlement Boundary for Ifold should not adversely affect any heritage assets, although we would prefer "the significance of any heritage assets".	Amend. Note designated and non-designated heritage assets	Policy H2 amended: the development will not adversely affect the significance of any heritage assets (designated and non-designated);
26	Historic England	Section 6		24	We also welcome Policy H4 both for its purpose and as being in accordance with paragraph 58 of the National Planning Policy Framework, which states <i>"...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics."</i>	No change. Historic England supports Policy H4	No change required.

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26	Historic England				We note that the Ifold and Plaistow Village Design Statements provide the necessary “understanding and evaluation” of those settlements’ “defining characteristics”. We welcome these as Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan. Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.	No change.	No change required.  The emerging Plaistow & Ifold Parish - Village Design Statement will reference this comment.
26	Historic England	Section 6		19-24	We would welcome a policy specifically for the conservation and enhancement of the historic environment of the Plan area, in accordance with the National Planning Practice Guidance advice to “ <i>put broader strategic heritage policies from the local plan into action at a neighbourhood scale</i> ”.	No change.	The Parish Council has made reference to the protection of heritage assets (both designated and non-designated) in the Environment and Heritage Section. The heritage assets (both designated and non-designated) are also identified in appendices of The Plan.
26	Historic England				Finally, three general observations. We think the Plan could be clearer in setting out in detail the issues affecting Plaistow and Ifold parish that the Plan’s policies and proposals are intended to address.  In our experience Neighbourhood Plans usually include a section on issues that have been identified through the community consultation process and/or higher level plans, which then inform and justify the Plan’s policies and proposals.	Amend.	The Consultation Statement explains issues and comments arising from public consultations and surveys.
26	Historic England			All	We suggest that the distinction between the policies and their supporting text be clearer. We appreciate that the policies are in a different colour text, but it would be clearer if they were not numbered as paragraphs in the supporting text are.	Amend.	The justification for policies have been amended to better inform the policies.  The document has been reformat to highlight policies and AIMS to be shaded.

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26	Historic England				Also, the preparation of the Neighbourhood Plan offers the opportunity to harness a community's interest in the historic environment by getting the community to help add to the evidence base, perhaps by the preparation of a comprehensive list of locally important buildings and features, and/or a survey of Grade II listed buildings to see if any are at risk of neglect, decay or other threats.	No change.	Through public consultations the Parish Council has identified building and historic assets and these are listed in the appendices and noted in policies

26	Historic England			<p><b>Appendix: Sources of Information</b></p> <p><b>The National Heritage List for England:</b> a full list with descriptions of England's listed buildings: <a href="http://list.historicengland.org.uk">http://list.historicengland.org.uk</a></p> <p><b>Heritage Gateway:</b> includes local records of historic buildings and features <a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a></p> <p><b>Heritage Counts:</b> facts and figures on the historic environment <a href="http://hc.historicengland.org.uk">http://hc.historicengland.org.uk</a></p> <p><a href="http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a> has information on neighbourhood planning and the historic environment .</p> <p><b>HELM (Historic Environment Local Management)</b> provides accessible information, training and guidance to decision makers whose actions affect the historic environment. <a href="http://www.helm.org.uk">www.helm.org.uk</a> or <a href="http://www.helm.org.uk/communityplanning">www.helm.org.uk/communityplanning</a></p> <p><b>Heritage at Risk</b> programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <a href="http://risk.historicengland.org.uk/register.aspx">http://risk.historicengland.org.uk/register.aspx</a></p> <p><b>Placecheck</b> provides a method of taking the first steps in deciding how to improve an area. <a href="http://www.placecheck.info/">http://www.placecheck.info/</a></p> <p><b>The Building in Context</b> Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <a href="http://building-in-context.org/toolkit.html">http://building-in-context.org/toolkit.html</a></p>	No change.	All relevant documents are in the appendices, noted in conformity references to policies. All evidence is available on the Neighbourhood Plan website for public viewing.
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					<p><b>Knowing Your Place</b> deals with the incorporation of local heritage within plans that rural communities are producing,  <a href="http://www.historicengland.org.uk/publications/knowning-your-place/">http://www.historicengland.org.uk/publications/knowning-your-place/</a></p> <p><b>Planning for the Environment at the Neighbourhood Level</b> produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information.  <a href="http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf">http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf</a></p> <p><b>Good Practice Guide for Local Heritage Listing</b> produced by Historic England, uses good practice to support the creation and management of local heritage lists.  <a href="http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/">http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/</a></p> <p><b>Understanding Place</b> series describes current approaches to and applications of historic characterisation in planning together with a series of case studies  <a href="http://www.helm.org.uk/server/show/nav.19604">http://www.helm.org.uk/server/show/nav.19604</a></p> <p><b>Oxford Character Assessment Toolkit</b> can be uses to record the features that give a settlement or part of a settlement its sense of place  <a href="http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm">http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm</a></p>		



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27	Environment Agency				<p>We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p> <p>Based on the environmental constraints within the area, we therefore have no detailed comments to make in relation to your Plan at this stage. However please find attached a copy of a Neighbourhood Plan checklist we have developed to help provide Environment Agency advice at the earlier stages of Neighbourhood Plan preparation. [attached separately]</p>	No comments.	No change required.
28	Natural England				<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. We have reviewed the attached plan, however <b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p> <p>If the Neighbourhood Plan changes and there is the potential for environmental impacts, Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening exercises may need to be undertaken.</p>	No comments.	No change required.

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29	South Downs National Park Authority (SDNPA)				<p>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.</p> <p>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.</p> <p>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 <a href="mailto:neighbourhood@southdowns.gov.uk">neighbourhood@southdowns.gov.uk</a></p> <p>Please note these comments are prepared by SDNPA officers only, they have not been considered or approved by SDNPA members.</p> <p>SDNPA officers make the following comments on the Plaistow and Ifold NDP:</p>	No comment.	No change required.

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30	South Downs National Park Authority (SDNPA)	1.3		3	<p>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> <p><b>Recommendation:</b> Make specific reference to the SDNPA being the Local Planning Authority for the part of the Parish within the National Park Consider specific reference to the Pre Submission South Downs Local Plan which will, once adopted, form part of the development plan There should be reference to the West Sussex Minerals and Waste Plan which also forms part of the Development Plan for the area.</p> <p><b>Recommendation:</b> 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</p>	Amend.	<p>CHANGE FROM: Chichester District Council (CDC) is the lead planning authority for this Neighbourhood Plan. CHANGE TO: Chichester District Council (CDC) is the lead planning authority for this Neighbourhood Plan. However, the South Downs National Park Authority (SDNPA) is the Local Planning Authority for that part of the Parish that resides in the South Downs National Park (as shown on Map 1: Designated Neighbourhood Area). The Parish Council can only draft planning policies that are in general conformity with the development plan for the area - which currently consists of the Chichester Local Plan Key Policies 2014 to 2029 (CLPKP), adopted in 2015; the SDNPA Pre-Submission South Downs Local Plan; the West Sussex Minerals and Waste Plan; and the National Planning Policy Framework (NPPF).</p>
32	SDNPA	1.4			<p>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</p> <p><b>Recommendation:</b> 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</p>	No change.	<p>CDC is the lead authority for this Parish and it is their responsibility to inform and consult with SDNPA. However, the Parish Council have noted the comment and will ensure that in future any further consultation is directed to the SDNPA.</p>

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33	SDNPA	2			<p>There is no reference to the National Park designation within the vision, this may be 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</p> <p><b>Recommendation:</b> Consider including reference to the South Downs National Park in the vision</p>	Amend.	<p>Vision amended as per recommendation.</p> <p>We care about where we live. We want to protect our sense of community, the safety and rural tranquility that we value. It's why we live here and why we choose to raise our families here, amongst generations of friends and familiar faces.</p> <p>Our four unique settlements will grow naturally; sympathetically blending new with old; respecting the character, natural boundaries and vistas in this special part of West Sussex; protecting our environment and quality of life for those living and working here today and for the generations to come. <b>With recognition of the importance of this Parish in contributing to the setting of the South Downs National Park.</b></p>
34	SDNPA	2.3			<p>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</p> <p><b>Recommendation:</b> Consider reference to the South Downs National Park purposes and duty and the importance of protecting the setting of the National Park</p>	Amend.	<p>Objectives amended:</p> <p>to recognise the importance of this Parish in contributing to the setting of the South Downs National Park;</p>
35	SDNPA		Aims & Objectives		<p>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</p> <p><b>Recommendation:</b> Consider reviewing repetition in the objectives sections</p>	Amend.	<p>Objective 1 has been deleted as it is duplicated in Objective 3. Objective 8 has been deleted as it is duplicated in Objective 7.</p>

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36	SDNPA	3.1		7	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 <b>Recommendation:</b> Accurately reflect that part of the Parish falls within the National Park	Amend.	The Parish is situated in the North East of Chichester District in a rural setting and part falls within the South Downs National Park.
37	SDNPA	3.2		7	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) <b>Recommendation:</b> Amend reference to the portion of the Parish which falls within the South Downs National Park	Amend.	Amended. The remaining 12.11% lies within the South Downs National Park and the Local Authority is SDNPA.
38	SDNPA		EH1	9	The policy makes no reference to the existing Conservation Area Appraisal and Management Plan, which may be relevant to this policy subject <b>Recommendation:</b> Consider reference to the Conservation Area Appraisal and Management Plan	Amend.	Refer to response to Comment ID: 5.
39	SDNPA		EH1	9	As currently worded the policy is very long and could benefit from review to focus the intention of the policy <b>Recommendation:</b> 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	Amend.	Refer to response to Comment ID: 5.
40	SDNPA	4.7	EH2	9-10	The SDNPA welcome specific reference to the SDNP in the justification of this policy.	Comment noted.	No change required.
41	SDNPA		EH2	9-10	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? <b>Recommendation:</b> Define more precisely the rural area of the Parish	Amend.	Refer to response to Comment ID: 6.

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42	SDNPA		EH2	9-10	<p>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</p> <p><b>Recommendation:</b> Consider review of policy wording to make the policy more effective and assist applicants and decision makers</p>	Amend.	Policy EH2 has been amended to reflect more positive emphasis in the policy.
43	SDNPA		EH2	9-10	<p>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 1 habitat survey in support of certain applications</p> <p><b>Recommendation:</b> Suggest that the requirement for Arboricultural Impact Assessment is included at Policy EH3. Consider reference to Phase 1 habitat survey in policy EH2</p>	Amend.	<p>Refer to response to Comment ID: 6.</p> <p>Policy EH3 amended accordingly. Refer also to Comment IDs: 6 and 26.</p>
44	SDNPA	4.25	EH4	12	<p>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</p> <p><b>Recommendation:</b> Local Green Spaces should be shown clearly on the policies map to assist applicants and decision makers</p>	Amend.	Refer to amendment to Comment ID: 7.
45	SDNPA	4.29	EH4	12	<p>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)</p> <p><b>Recommendation:</b> Remove Paragraph 4.29 or replace with a simple reference to the relevant part of the NPPF</p>	Amend.	Refer to amendment to Comment ID: 7.

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46	SDNPA		EH4	12	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 <b>Recommendation:</b> Provide more detail to support the designation of Local Green Spaces	Amend.	Individual assessment sheets for proposed Local Green Space will be appended to The Plan.
47	SDNPA		EH5	13	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 <b>Recommendation:</b> Consider review of policy wording to include a hierarchal approach to the control of artificial lighting emissions	Amend.	Insert Conformity Reference: SDNPA Pre-Submission South Downs Local Plan - Strategic Policy SD8: Dark Night Skies.  Refer to Comment ID: 8.
48	SDNPA		EH6	14	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 <b>Recommendation:</b> Consider whether this policy could be Included as a part of Policy EH5	Amend.	EH6 - Refer to Comment ID: 9.
49	SDNPA	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 <b>Recommendation:</b> 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	No change.	Refer to the response to Comment ID: 10
50	SDNPA	5.5-5.7	CI1	16	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 <b>Recommendation:</b> Provide clearer definition of high and moderate flood areas in the Parish	Amend.	Refer to response to Comment ID: 12.

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51	SDNPA	5.15-5.22		18	<p>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</p> <p><b>Recommendation:</b> 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</p>	No Change.	Refer to response to Comment ID: 13.
52	SDNPA	5.21		18	<p>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</p> <p><b>Recommendation:</b> 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</p>	Amend.	Refer to the response to Comment ID: 11.
53	SDNPA		H1	20	<p>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</p> <p><b>Recommendation:</b> Consider review of the Policy to ensure that the housing requirement for the Parish is met</p>	Amend.	Policy H1 has been amended to reflect CLPKP indicative housing allocation and that The Plan proposes to allocate 11 units.



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54	SDNPA		H1	20	<p>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</p> <p><b>Recommendation:</b> Consider whether the policy requirement to remove permitted development rights is appropriate</p>	Amend.	The Parish Council has allowed for this to be modified if the Parish Housing Need has change. Policy H1 amended.
55	SDNPA		EE4	28	<p>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</p> <p><b>Recommendation:</b> Consider whether this allocation is appropriate</p>	Amend. Not supported by LPAs: CDC and SDNPA in their Reg14 representations.	<p>The Parish Council with our engaged Planning Consultants has reviewed Policy and made some amendments and after discussion with CDC Planning Department, to ensure that an alternative viable use is achieved.</p> <p>Accordingly, alternative uses of the site should be sought to ensure there is efficient, effective and appropriate use of the land. The Parish Council is keen to see the site redeveloped in accordance with the encouragement to reuse land effectively that has been previously developed (NPPF paragraph 17).</p> <p>As a result, and subject to viability studies, the use of the site for a mixed use is proposed. Small, light commercial start-up type units will be encouraged that are not harmful to residential amenity, and live/work units will be encouraged.</p>
56	SDNPA		EE4	28	<p>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</p> <p><b>Recommendation:</b> Consider providing a map to support this site and define clearly whether this is a formal allocation in the NDP</p>	Amend.	The map of the Brownfield Site has been included.

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57	SDNPA	8.11			<p>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</p> <p><b>Recommendation:</b> 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</p>	No change.	Refer to response to Comment ID: 13.
58	SDNPA		SA/SEA		<p>The Environmental report does not clearly set out how the reasonable alternatives have been identified.</p> <p>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.</p> <p>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.</p> <p>It would also be appropriate to consider the brownfield site identified in the NDP in the Environmental Report (SEA/SA)</p> <p><b>Recommendation:</b> Consider the reasonable alternatives proposed in the SEA/SA</p>	Amend.	The SEA Environmental Report is to be reviewed by AECOM and in accordance with the minor amendments made to The Plan following Reg14.

59	West Sussex County Council (WSCC)			<p>The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies and pre-2004 Local Plans. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.</p> <p>In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.</p> <p>In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.</p> <p><b>Strategic Transport Assessment</b></p> <p>The Strategic Transport Assessment of the Chichester Local Plan, adopted in July 2015, tested the cumulative impact of strategic development proposed within the</p>	<p>Amend.</p> <ol style="list-style-type: none"> <li>1. Reference the current West Sussex New Minerals Local Plan (10 Aug 2017 adopted 2003)</li> <li>2. Reference the emerging West Sussex New Minerals Local Plan - The new Plan will outline the plans for mineral provision in West Sussex until 2033.</li> <li>3. Reference the West Sussex Waste Local Plan - The strategy for the management of waste in West Sussex until 2031. (15 Aug 2017)</li> <li>4. Add Conformity Reference: WSCC Home to School and College Transport Policy (2016)</li> <li>5. Add hyperlinks to above noted documents</li> </ol>	<ol style="list-style-type: none"> <li>1. Reference the current West Sussex New Minerals Local Plan (10 Aug 2017 adopted 2003) <ul style="list-style-type: none"> <li>• Add hyperlink to web address: <a href="https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/current-minerals-local-plan/">https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/current-minerals-local-plan/</a></li> </ul> </li> <li>2. Reference the emerging West Sussex New Minerals Local Plan - The new Plan will outline the plans for mineral provision in West Sussex until 2033. <ul style="list-style-type: none"> <li>• Add hyperlink to web address: <a href="https://webcache.googleusercontent.com/search?q=cach e:6kkTZpuFABUJ:https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/waste-local-plan/+&amp;cd=1&amp;hl=en&amp;ct=clnk&amp;gl=uk&amp;client=firefox-b">https://webcache.googleusercontent.com/search?q=cach e:6kkTZpuFABUJ:https://www.westsussex.gov.uk/about-the-council/strategies-plans-and-policies/environment-planning-and-waste-plans-and-policies/minerals-and-waste-policy/waste-local-plan/+&amp;cd=1&amp;hl=en&amp;ct=clnk&amp;gl=uk&amp;client=firefox-b</a></li> </ul> </li> <li>3. Reference the West Sussex Waste Local Plan - The strategy for the management of waste in West Sussex until 2031. (15 Aug 2017)</li> <li>4. Add Conformity Reference: WSCC Home to School and College Transport Policy (2016) <ul style="list-style-type: none"> <li>• Add hyperlink to web address: <a href="https://www.westsussex.gov.uk/media/9691/school_and_college_transport_in_west_sussex.pdf">https://www.westsussex.gov.uk/media/9691/school_and_college_transport_in_west_sussex.pdf</a></li> </ul> </li> </ol>
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					<p>Chichester District. The Strategic Transport Assessment identified the additional travel demand as a result of planned development, over and above development already committed plus background growth. The County Council worked collaboratively with Chichester District Council to inform the Strategic Transport Assessment and on the basis of continuous review of the work carried out, supports its conclusions.</p> <p>The Strategic Transport Assessment of Strategic Development Options identified the impact of the Strategic Development Locations on the highway network through a robust transport modelling exercise using the Chichester Area Transport Model (CATM). The study methodology was agreed by the County Council and the Highways Agency.</p>		
59	WSCC				<p>The Strategic Transport Assessment identifies a package of mitigation measures consisting of improvements to junctions on the Chichester Bypass section of the A27 and smarter choices measures to encourage the use of sustainable modes of transport. The effects of smarter choices measures were modelled by applying a 5% reduction in car trips to / from the SDLs in 2031 to test the effects of development-specific travel planning and behaviour change packages. A 7% reduction in trips to / from Chichester city centre in 2031 was also applied to test the effects of area-wide smarter choices and local infrastructure measures. The study demonstrates that this package of mitigation measures is sufficient to accommodate the levels of development proposed within the Chichester Local Plan.</p>	<p>No Change.</p> <p>Comment noted.</p>	<p>No change required.</p>

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59	WSCC				The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the Chichester Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the Chichester Local Plan. The Strategic Transport Assessment took account of the sites allocated in the Chichester Local Plan and included a forecast estimate of background traffic growth.	No Change. Comment noted.	No change required.
59	WSCC				In considering the Neighbourhood Plan for Plaistow and Ifold, the size and location of the proposed site allocation has been taken into account when considering if further transport evidence is required at this stage.	No Change. Comment noted.	No change required.
59	WSCC				The overall level of development proposed in the Plaistow and Ifold Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the Plaistow and Ifold Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Plaistow.	No Change. Comment noted.	No change required.

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59	WSCC				<p>The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.</p>	<p>No Change. Comment noted.</p>	No change required.
59	WSCC				<p>The County Council have no overriding concerns about the transport impacts of the Plaistow and Ifold Neighbourhood Plan.</p> <p>However, given that the pre-submission Neighbourhood Plan for Plaistow and Ifold includes the proposed allocation of a small scale housing site, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.</p> <p>The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:</p>	<p>No Change. Comment noted.</p>	No change required.

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59	WSCC		EH6	14	<p><b>Policy Comments</b></p> <p>Policy EH6 Street Lighting:- Concern that the policy allows no flexibility. Part of the Neighbourhood Plan area falls within the SDNP, where there is an understanding that all new development within the park need not be lit unless there are extenuating circumstances, considered on an individual basis, which demand it to be lit and then only lighting which conforms to the zero upward light specification and the latest WSCC Development Standard for Highway Lighting will be considered. There is no such agreement with Chichester District Council. It is requested that the policy is changed to allow flexibility though changed wording to <i>‘The provision of new or additional street lighting will not normally be permitted unless it is considered necessary by the Local Highway Authority’.</i></p>	Amend.	EH6 - Refer to Comment ID: 9.
59	WSCC		H1	20	<p>Policy H1: Suggest consideration given to the creation of a Public Right of Way as part of the development to link with the local PROW network. Upgrading this and associated routes could allow for shared use to allow cyclists as well as pedestrian traffic. If so addition of Public Rights of Way (PROW) reference in the policy.</p>	No change.	<p>Existing PROWs are noted on Map 11.</p> <p>Refer to AIM – T1 – Public Rights of Way.</p>
59	WSCC		H4	24	<p>Policy H4 and T1: For residential parking provision, please refer to the County Council’s Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator, which can be accessed via the following link:</p>	<p>Amend.</p> <p>Reference to ‘Revised County Parking Standards And Transport Contributions Methodology’ (Supplementary Planning Guidance adopted by West Sussex County Council November 2003)  <a href="http://www2.westsussex.gov.uk/cs/mis/041103ht2b.pdf">http://www2.westsussex.gov.uk/cs/mis/041103ht2b.pdf</a>   <a href="https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/">https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/</a></p>	<p>Request pre-application advice from WSCC, the Highways authority, on road and transport issues associated with any proposed development.</p> <p><a href="#">Guidance on car parking in residential developments (PDF, 94KB)</a> and <a href="#">Car parking demand calculator (Excel, 6MB)</a> – Applies to parking in residential developments where requirements are calculated on a site-specific basis using the demand calculator. To accompany this calculator <a href="#">view maps (PDF, 11MB)</a> showing the wards in each district.</p>

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59	WSCC		T1	29-30	Policy H4 and T1: For residential parking provision, please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator, which can be accessed via the following link:	Amend. Reference to 'Revised County Parking Standards And Transport Contributions Methodology' (Supplementary Planning Guidance adopted by West Sussex County Council November 2003) <a href="http://www2.westsussex.gov.uk/cs/mis/041103ht2b.pdf">http://www2.westsussex.gov.uk/cs/mis/041103ht2b.pdf</a>  <a href="https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/">https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/</a>	Request pre-application advice from WSCC, the Highways authority, on road and transport issues associated with any proposed development.  <a href="#">Guidance on car parking in residential developments (PDF, 94KB)</a> and <a href="#">Car parking demand calculator (Excel, 6MB)</a> – Applies to parking in residential developments where requirements are calculated on a site-specific basis using the demand calculator. To accompany this calculator <a href="#">view maps (PDF, 11MB)</a> showing the wards in each district.



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59	WSCC				<p><b>Other comments</b></p> <p>It is suggested that wider reference to Public Rights of Way are used through the document, an example being para 2.7 of the vision, bullet points 2 and 3 where there is reference to improvements to public footpaths and introduce cycle routes, reference to bridleways in this context is suggested should also be included. Set out below is a potential list of route upgrades/creations.</p> <p>Objectives in paragraph 8.1 and Aims T1, T2 and T3 could be expanded to include a broader stance on existing /creating Public Rights of Way to encompass all users.</p> <p>Potential examples of route upgrade / creations:</p> <ul style="list-style-type: none"> <li>• An upgrade of Footpath 3520 to Bridleway status would allow a link between Restricted Byway 639 and Bridleway 636, thus reducing the distance equestrian users would need to travel by road.</li> <li>• The creation of a Bridleway through Kingspark Wood (utilising existing tracks, for example) would link Bridleways 636 and 566 for pedestrian, equestrian and cycle use, also creating a local off-road cycling loop for Plaistow and Shillinglee residents.</li> <li>• The creation of a new footpath, perhaps in part parallel to the Dunsfold Road or using existing tracks through Ashpark Wood, would help connect Durfold Wood and Plaistow Village.</li> <li>• The creation of a new bridleway linking Plaistow Village with Bridleway 635 would provide an off-road cycling or equestrian alternative for residents to and from Ifold; this could be created, at least in part, by up-grading existing footpaths.</li> </ul>	No c.hange.	No change required. Refer to AIM – T1: PUBLIC RIGHTS OF WAY