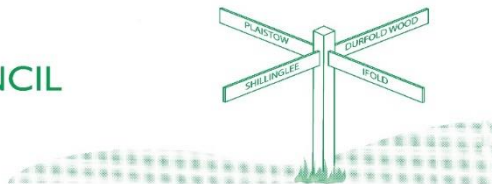


PLAISTOW AND IFOLD PARISH COUNCIL



15th July 2022

Toby Ayling
Planning Policy Divisional Manager
Chichester District Council
East Pallant House
1 East Pallant
Chichester
PO19 1TY

Dear Mr Ayling,

Re: Response to your letter dated 19 January 2022 advising Parish Councils of progress with the Local Plan Review and advising that CDC should “look again” at the Northern Part of the Plan Area to consider to what extent any shortfall in housing delivery may be reduced by further development in this area.

Plaistow and Ifold Parish Council are writing with reference to the Local Plan Review and the requirement for Chichester District Council to ‘look again’ at the Northeast Area of the District to determine if the shortfall in housing delivery, caused by constraints in the Southern part, could be reduced by delivering more housing in this area as outlined by CDC Planning Policy Divisional Manager, Mr Ayling, in his letter to the Parish Council dated 19th January 2022.

The Parish Council are cognisant of the need to provide **sustainable housing** in the District and wish to assist the District Council in testing whether such development can be achieved in this Parish.

The basis of any test must be the NPPF and the fundamental requirement to meet the objective of Sustainable Development, which can be summarised as “*meeting the needs of the present without compromising the ability of future generations to meet their own needs*”. And this is achieved through the three objectives, **Economic, Social and Environment**.

The NPPF goes on to state, at paragraph 11:

*Plans and decisions should apply a presumption in favour of sustainable development. For **plan-making** this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;...

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area;*
- or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

The Parish Council has accordingly approached the various scenarios for housing development numbers proposed for the Parish on the basis of sustainable development. In doing so it has considered the District Councils supporting documents including the HELAA, and CDC Landscape Capacity Study March 2019. And work previously undertaken by the Parish Council to develop its Neighbourhood Plan, now withdrawn, following the impact of water neutrality.

The Parish Council set out its findings below:

Economic Objective:

Housing development would undoubtedly provide a short-term economic boost to the Parish during the construction phase, possibly providing some local employment and use of local shops and public houses in the northern area. But for the larger housing numbers, development would be built out by large house building companies not necessarily using local trades and employees would travel into the area from elsewhere. Materials again would be sourced from a regional and national basis and unlikely to provide any benefit to the Parish. Therefore, in the short term, economic benefit would be limited.

Completed housing development would bring benefits of use of local facilities, local shops, cafés, public house, and village halls; but the local facilities are limited, and it is far more likely that new residents would travel out by car to seek shopping, entertainment, and work in the larger urban areas, as does much of the current population of the Parish. The larger urban areas used are outside of Chichester District e.g., Horsham and the County e.g., Haslemere, Godalming and Guildford by way of a few examples.

Therefore, when set against the social and environmental impacts detailed below, the economic benefit to the Parish and the economic benefits to Chichester District (and the County) are outweighed.

Social Objective:

Social impact. The Parish is one of low population with 1900 residents, with two small rural villages and two hamlets. The scenario for the large development figures would radically alter the characteristic of the rural area. Absorbing such large percentage increases would overwhelm the

existing housing and population. The upper figure of 795 new houses would be greater than the villages of Plaistow and Ifold together. Taking a reasonable average of 2.5 people per unit, **this would result in a 100% increase in the total population of the Parish.** Few of whom would have any local connection and be drawn in from larger urban areas. This would adversely impact on a sense of community, belonging, cohesion and engagement.

The Parish Council notes the District Council's Local Development Scheme (LDS) 2021 – 2024; a document which ***"identifies and timetables the planning documents that the [District] Council will prepare to plan for development in its area."*** The preparation, maintenance, and publication of a LDS is a statutory requirement pursuant to s.15 of The Planning and Compulsory Purchase Act 2004 (as amended by Section 111 of the Localism Act 2011).

Within the LDS the Local Planning Authority (LPA) stipulates, at paragraph 3.2,; -

"Whilst the NPPF is a material consideration in decision making, the weight given to it relative to the Development Plan is left to the decision taker. The NPPF confirms that the planning system is "plan led" which means that planning applications have to be determined in accordance with the Development Plan, unless material considerations indicate otherwise."

One of the planning documents which the LPA has prepared *"to plan for development in its area"* is the Interim Position Statement for Housing (IPSH). This document is referenced at paragraph 5.1 of the LDS.

The objective of the IPSH is to help guide development in the Local Plan area until the Local Plan Review is adopted. Paragraph 5.1 states: -

"The Interim Position Statement draws together the adopted and emerging Local Plan policies to outline the types of new residential development that the Council would support within the Local Plan area. The Statement is designed to assist potential applicants in understanding the sorts of proposals that would be considered appropriate."

Therefore, in accordance with paragraph 3.2 and 5.1 of the LDS (as stated above), planning applications have to be determined in accordance with the IPSH, which forms part of the "plan led" decision making process.

Paragraph 2 of the Interim Position Statement for Housing states: -

2.1 *The Council is required to significantly boost its housing supply¹, and is working proactively to achieve a five-year supply at the earliest possible date.*

¹ Planning Practice Guidance – Housing Land Supply [Link to PPG - Housing Land Supply Guidance](#)

- 2.2 *Until the LPR is adopted, the Council must continue to judge planning applications on their own individual merits with reference to the adopted Development Plan and national planning policy including the NPPF.*
- 2.3 *This [IPSH] statement aims to provide interim guidance which will apply until the Council has adopted the Local Plan Review. If, prior to that point the Council has established a 5 year supply, then the need for this Interim Position Statement will be reviewed at that point. The intention is for the Council to be able to guide development to appropriate and sustainable locations using this document to assist in the consideration of planning applications. It will help to ensure that housing proposals that may be submitted in advance of the Local Plan Review are assessed in a consistent manner against national and local planning policies, with the aim of ensuring that the most appropriate development comes forward in the most suitable locations.*
- 2.4 *The Council intends for this Interim Statement to form one part of the Council's proactive approach to the delivery of housing whilst the LPR progresses towards adoption.*

Therefore, the 13 criteria set out at paragraph 6.2 of the IPSH will guide how the LPA “looks again” at the Northern Part of the Plan Area to consider to what extent any shortfall in housing delivery may be reduced by further development in this area. In accordance with paragraph 5.3 of the IPSH, the Interim Statement *“applies to greenfield and brownfield sites outside of settlement boundaries and does not apply to existing allocations within the Chichester Plan area or to land within the South Downs National Park.”*

Points 1 - 3 of the 13 criteria are particularly key to the current considerations, especially within the Parish of Plaistow and Ifold.

1. *The site boundary in whole or in part is contiguous with an identified settlement boundary as approved in the adopted development plan (i.e. at least one boundary must adjoin the settlement boundary or be immediately adjacent to it). Where a proposal is separated from the settlement boundary by road, railway line, cycle path or pedestrian footpath, it will meet this criterion where it is shown to be sustainable and integrated with the settlement it adjoins.*

All the Parish (except Ifold Estate and the properties on Plaistow Road, between The Ride and The Drive) are in designated countryside. There is only one settlement boundary namely Ifold. Considering this fact, the housing numbers being “tested” within the growth scenarios for Plaistow and Ifold would either have to fall outside of a settlement boundary and be developed in greenfields, or be included within the existing development of Ifold. Given Ifold's proximity to Loxwood Parish, such a significant increase in housing numbers would significantly risk contravening criteria 3, namely:-

3. *The impact of development on the edge of settlements, or in areas identified as the locations for potential landscape gaps, individually or cumulatively **does not result in the actual or perceived coalescence of settlements**, as demonstrated through the submission of proportionate evidence. Where a proposed development is environmentally significant (by*

virtue of its size, location, or degree of prominence in the locality), development proposals must be accompanied by a Landscape and Visual Impact Assessment.

Likewise, in accordance with criteria 2,

2. *The scale of development proposed is appropriate having regard to the settlement's location in the settlement hierarchy and the range of facilities which would make it a sustainable location for new development.*

Aside from one small convenience shop and a village hall, Ifold has no other facilities “*which would make it a sustainable location for new development*” and, as highlighted above, it is far more likely that new residents will, like the current ones, travel out by car to seek shopping, entertainment, and work in the larger urban areas. This huge increase in population – the potential of 100% increase - with limited local connections, will irrefutably damage the sense of community, belonging, cohesion and engagement within the Parish of Plaistow and Ifold.

Paragraphs 4.8 of the IPSH states: -

Sites should be of a scale and density appropriate to the adjoining settlement. Smaller scale sites, that provide for the gradual growth of settlements, are more likely to be suitable than sites that would significantly change the character of a place. Developments adjoining smaller settlements which are less locationally sustainable will be expected to be smaller in scale than those that might be suitable for the extension of Chichester or the Settlement Hubs, with their larger sizes and range of facilities. The Council may support higher density development in settlements with greater facilities and accessibility².

Plaistow and Ifold Parish Council respectfully submits that this paragraph is key to any consideration for development within the Parish; and that it is immaterial *where* within the Parish boundary such housing numbers are located, at the levels being “tested”, such development will unquestionably “*significantly change the character of [the] place*”. The levels being “tested” are of a scale and density inconsistent with any of the existing settlements within the Parish. Considering the very limited facilities and the indisputable fact that Plaistow and Ifold Parish is a “*less locationally sustainable*” area, development must be smaller in scale and “*provide for the gradual growth of [the] settlements [as these] are more likely to be suitable...*”

Employment: Work opportunities in the Parish are very limited and there are no large employers. Currently, most people in the Parish who work commute by car to larger urban centres. Those who work in the Parish mainly work from home in small businesses, generally self-employed, or work for employers outside of the Parish, and so are not generating additional employment. Therefore, the proposed new development would result in significantly more car journeys in the Parish. The

² As set out in paragraphs 123 and 137 of the NPPF

new housing development would essentially be dormitory, further impacting on that sense of community, belonging and engagement.

Social Facilities: The area is undoubtedly a beautiful tranquil rural place to live, but it does not have the facilities to meet the needs of a significantly expanded population, with two village halls and rural sports facilities located only in Plaistow village. The road between Ifold and Plaistow – Plaistow Road - is considered significantly dangerous that a free school bus service is provided to convey children the 1 mile to the Primary School. Therefore, residents already choose to travel by car to Plaistow village to use the village green, football field and children's play equipment. Plaistow village does not have adequate parking facilities and being within a Conservation area and much of the land being owned by the National Trust, provision of additional adequate parking is highly unlikely. Access between the settlements within the Parish can only reasonably be achieved by car. Many residents of any new development would have to travel out by car to find suitable sports, leisure, and entertainment facilities. The Parish also does not have a range of shopping facilities with only two small village shops, and again residents must travel by car or have deliveries by vehicles.

Social infrastructure is already limited or at capacity serving this Parish. This includes both the local Primary school and the Secondary school in Billingshurst, where significant development has impacted school places further. Medical services in Loxwood and Chiddingfold are already stretched and are shared with Loxwood, Kirdford and Wisborough Green, all of which are themselves being considered for additional housing.

Alternative Modes of Transport: There is no adequate bus service for the Parish, there is no rail service and no link between the two public modes of transport. The closest main railway lines are 7 miles away at Billingshurst and Haslemere. Car ownership and use is essential to access any facilities, services, or work. Car ownership within the Parish is uncharacteristically high; 75% of households owning more than 2 cars³. Development would therefore necessarily increase car usage. Due to its proximity to the South Downs National Park, due consideration must be given to the impact additional traffic from any new development would have on the National Park. For example, traffic accessing Haslemere, or Guildford will travel through the Plaistow Conservation Area and the SDNP.

Highway Infrastructure: The road network in the Parish is all C class, there are no A or B class roads. The roads are narrow country lanes without pavements and street lighting. The existing volume and speed of traffic already impacts adversely on residents, creating noise, danger and reducing the willingness to cycle or walk to facilities/ services or to engage in leisure activities such as walking, cycling, running and horse riding. Increased housing development will, as demonstrated above, increase car usage.

³ Results of Questionnaire ascertained for the Parish's Neighbourhood Plan [draft, now withdrawn]

The development at Crouchlands Farm with scenarios of up to 600 houses would use Foxbridge Lane to access Plaistow Road to the B2133, the closest main road leading to the A281 and A272. This lane is of substandard construction not designed for high volumes of traffic, and despite recent significant repairs and resurfacing the road surface has developed major fractures. The width of the carriage way is such that two standard cars can only pass with care and part is only single carriageway. HGV and cars cannot pass without mounting the verge, resulting in incidents of vehicles having to make dangerous manoeuvres (as identified in the Appeal Decision for Crouchlands Farm⁴). Increasing vehicle numbers would result in greater danger. To facilitate such development would require Foxbridge Lane to be reconstructed as a two-lane highway through its length requiring compulsory purchase of adjoining land and impacting on Ancient woodland at Corner Copse and a Grade II Listed Building at Foxbridge Farm.

The alternative route from Crouchlands Farm takes vehicles through the quiet historic village centres of Plaistow, or Kirdford in the adjoining parish. Both with conservation areas. This would adversely impact residents, as detailed in the paragraph above, creating negative social impacts, as well as impacting the historic environment.

The wider road network feeds to the A281 to Guildford and with the cumulative impact of development at Dunsfold of 2600 new houses and further development in Cranleigh and Alfold together with additional development in Loxwood, would result in still further significant delays accessing the city. To the south the A272 is impacted by the narrow Newbridge slowing vehicle movement and resulting in long tailbacks. Again, significant development in Billingshurst is resulting in additional vehicle movements. This bridge is also subject to closure from flooding.

Criteria 5 of the Interim Position Statement for Housing states: -

“Proposals should demonstrate that development would not have an adverse impact on the surrounding townscape and landscape character, including the South Downs National Park⁵ and the Chichester Harbour AONB and their settings....”

As set out above, to improve the highway infrastructure within the Parish, especially along Foxbridge Lane, would *“have an adverse impact on the surrounding townscape and landscape character...”* and the increased number of vehicle movements within the Parish and surrounding area would *“have an adverse impact on the surrounding townscape and landscape character, including the South Downs National Park...”*

Criteria 10 of the Interim Position Statement for Housing states: -

⁴ Appeal Decisions APP/L3815/C/15/3133236 & 3133237 & APP/P3800/W/15/3134445

⁵ Under Section 62 of the Environment Act 1995

Development should be sustainably located in accessibility terms, and include vehicular, pedestrian and cycle links to the adjoining settlement and networks and, where appropriate, provide opportunities for new and upgraded linkages.

As set out above, the current transport and highway infrastructure within the Parish considered alongside the nuances of the landscape topography means that “*opportunities for new and upgraded linkages*” are limited and significant development within the Parish area would not be “*sustainably located in accessibility terms*”.

Water and Sewerage: Basic amenities of water and sewerage are also already over capacity. The Parish sewerage network links directly to Loxwood pumping station and treatment works, which is now at capacity. New development in Loxwood is not connected to mains foul drainage but resorts to underground storage with effluent taken away by road tanker. This is not sustainable development or appropriate, increasing risks of pollution and vehicle movements. Southern Water Authority have been unable to demonstrate that this situation will be resolved within 5–7-year time frame. Therefore, proposed new housing for this Parish would equally result in unacceptable means of disposing of waste. Already the foul drainage system which runs from Plaistow through Ifold suffers from overflow during heavy rainfall with manholes lifting and sewerage running down the roads in Ifold and sewerage backing up in some houses. There is therefore not sufficient capacity in the system and significant capital investment is required in this Parish as well as Loxwood.

Water supply can also not be met. The Parish falls into the North Sussex Water Zone with abstraction at Hardham, which Natural England have determined impacts adversely the Arun Valley SAP SAC and RAMSAR. Therefore, currently all new development must demonstrate water neutrality. New housing development in this Parish would be unable to meet this requirement, there are no means by which any large volume of housing could offset usage even when employing rainwater and grey water harvesting. Although it is planned to resolve this issue, Natural England state that “*Given existing pressures, both environmental and developmental, achieving Water Neutrality is likely to remain necessary for as long as the adverse effect risk from water supply abstraction continues, and may be required until the Habitats sites in question are restored to FCS. In practical terms, this is likely to require the delivery of an alternative water supply (estimated around 2030 with significant uncertainty)*”⁶.

Duty of Co-Operation: There is a requirement for Local Authorities to co-operate with other Authorities. Any significant development growth for Plaistow and Ifold will have aggregate effect with the growth of other local areas, and as such should be considered together, particularly for all aspects of infrastructure.

Criteria 7 of the Interim Position Statement for Housing states: -

⁶ Natural England’s Advice Note regarding Water Neutrality within the Sussex North Water Supply Zone: February 2022 V2

“Development proposals should set out how necessary infrastructure will be secured, including, for example: wastewater conveyance and treatment, flood mitigation and defence, affordable housing, open space, and highways improvements.”

Due to the scale of the various growth scenarios being “tested” within a Parish area with demonstrably few facilities, the “*necessary infrastructure*” required to support the proposed growth - either within the Parish or without - is significant. This required infrastructure is outside the gift of the LPA to deliver. The “*necessary infrastructure*” to support the level of development being tested, which would essentially amount to a wholly new settlement, will be complex and multi-faceted. The scale and cost to deliver the “*necessary infrastructure*” to support a new settlement may exceed the budgeting and deliverable capabilities of the responsible authority / organisation. For example, it is not enough to simply build a new school, or medical centre (the building fabric), these institutions must be staffed by professionally trained personnel - just one example of the additional elements required to delivering the “*necessary infrastructure*”. Therefore, the LPA will need to ensure that robust evidence is available from the relevant authorities and organisations to demonstrate “*how [the] necessary infrastructure will be secured*”. Similarly, considering the significant development already completed, begun and/or proposed in adjoining Chichester District Parishes (e.g., Loxwood and Kirdford) and County areas e.g., Horsham District and Waverley District in Surrey, all of which share existing services and facilities with Plaistow and Ifold, the burden upon the LPA to ensure that the “*necessary infrastructure will be secured*” is even more pertinent.

Environment Objective:

Landscape: The Parish is predominantly rural and borders the South Downs National Park (SDNP) and part of the Parish is in the Park. The landscape is intrinsically part of and supports the designated area of the Park. The Parish landscape is as valued and valuable as that in the nearby Park. The Parish landscape is recognised in CDC landscape Capacity Study⁷ as having low, medium/low, and medium capacity to accommodate new development. Therefore, the landscape in the Parish has been identified as having no ability to accommodate large scale development without significant adverse impact.

In particular the major development at Crouchlands Farm (HP10009) immediately adjoins the area of Plaistow and Ifold Low Weald, sub-area 156, which is found to have low/medium capacity for development, the conclusion states:

Sub-area 156 has a medium / low capacity, constrained by its reasonably rural character, distinctive topography and ‘knolls’ and its role as an integral part of the rural setting of nearby settlement and conservation area. The area is well-served by PRoW with links to the South Downs National Park. There are panoramic, mid and distant views, particularly towards the south and south-east from PRoWs and views from tracks, rural lanes and the conservation area. The area retains a clear sense of history through its historic medieval assarted field pattern, presence of many listed buildings and their

⁷ Chichester local plan review 2035 landscape capacity study March 2019

settings, historic farmsteads and the historic settlement core. Has a strong, cultural association with the iron working industry. Many areas of ASNW and SNCI's present. The area contains many of the characteristic features typical of the wider LCA, well used and travelled by locals and visitors although tranquillity has been negatively affected by traffic and aircraft noise, and suburban elements, including paddocks, equestrian uses, and modern styles of housing around the settlement edge....
.....It is possible that a very small amount of development may be accommodated within existing clusters of farmstead settlement, larger garden plots, paddocks or building conversions provided it is informed by further landscape and visual impact assessment and sensitively integrated into the

landscape, respecting the historic settlement pattern and locally distinctiveness, although great care would need to be taken to avoid any landscape or visual harm. New development in this area would extend the built edge southwards and eat into adjacent paddocks and historic fields. Although the flat land and vegetation structure provides opportunities for small scale barn/ single house forms of development, within paddocks, this would further dominate the village edge and add pressure to sensitive ecological and landscape features. The combination of these factors would result in a largely negative effect on settlement pattern.

The landscape at Crouchlands Farm is not dissimilar to the adjoining sub-area 156 and many of the statements above apply equally, it is well traversed with PROW with long and short views, there are ancient woodlands, historic links to glassworks, and is valued by the local community. In the Appeal Decision⁸ for development at Crouchlands Farm, the Planning Inspector held that “The West Sussex

Landscape Character Assessment of 2003 notes that the area has a remote and tranquil character. I consider that the combination of all the development noted above is detrimental to the identified rural character of the surroundings...”

Development scenarios of up to 600 units in Crouchlands Farm fields (HP10009) would have a severe detrimental impact on the landscape. Further this land is a productive working farm and development would negatively impact food production.

With respect to development southeast of Foxbridge Cottage (HP10002), the Landscape capacity document concludes this area, referred to as Foxbridge Low Weald sub-area 161, has a medium capacity.

“Sub-area 161 has a medium capacity, however is constrained by its strongly secluded rural and riparian character, its flood zones, extensive woodland/copses, wooded over common, streams and SNCI. There are limited views from the public bridleway, footpaths and Plaistow Road. The area retains a clear sense of history through its historic medieval assarted field pattern, ancient woodland and contains many of the characteristics that are typical of the wider LCA, with traffic movement and noise having a negative effect on its tranquil character. It is well used and travelled through by locals, people engaged in sport and visitors. It is possible that a small amount of additional development may be accommodated within existing clusters of settlement and equestrian centres/ paddocks provided it is

⁸ Appeal Decisions APP/L3815/C/15/3133236 & 3133237 & APP/P3800/W/15/3134445

informed by further landscape and visual impact assessment and sensitively integrated into the landscape, respecting the historic settlement pattern and local distinctiveness, although great care would need to be taken to avoid any landscape or visual harm.”

Accordingly, development scenarios for this area would have a severe detrimental impact on the landscape.

Additional development proposed west of Loxwood would also impact the settlement of Ifold. This area, identified as Loxwood Western Low Weald sub-area 158, has medium to low capacity for development. It would result in a detrimental impact on Ifold and its immediate surroundings and result in a virtual coalescence of the two distinct settlements, significantly closing the Green gap.

The Parish Council notes Criteria 5 of the Interim Position Statement for Housing: -

“Proposals should demonstrate that development would not have an adverse impact on the surrounding townscape and landscape character, including the South Downs National Park and the Chichester Harbour AONB and their settings. Development should be designed to protect long-distance views and intervisibility between the South Downs National Park and the Chichester Harbour AONB.”

Biodiversity: The Parish has extremely good levels of biodiversity with large tracts of woodland, many of which are designated Ancient Woodland, ancient hedgerows, and medieval field patterns. The settlements are all low density with very high levels of tree cover, particularly in Ifold. There are several designated areas in the Parish and the Parish is within the SSSI Impact Zone for Chiddingfold Forest SSSI (Site of Special Scientific Interest) and within the Zones of Influence of The Mens Special Area of Conservation (SAC) and Ebernoe Common SAC, both of which have been designated for their bat populations, particularly Bechstein and Barbastelle populations.

There are many protected species within the Parish, including badgers, dormice, great crested newts, and adders, including many nocturnal species; in particular there are rare Bechstein and Barbastelle bats. The Parish also provides habitat for the extremely rare Wood White butterfly. Large scale development is likely to have a detrimental impact, with even medium density housing resulting in loss of trees and hedgerows and green fields.

Development brings noise, human disturbance, vehicle movements and light pollution. The Parish with its low housing numbers has little light pollution and there is no street lighting. This contributes significantly to the SDNP dark skies policies, which the Parish Council supported when drafting its Neighbourhood Plan. The Parish Council considers that development nearly doubling the housing units in the Parish could only have an adverse impact and no mitigation could replace the quite tranquil and essentially dark rural countryside.

Climate change / Climate emergency: CDC have recognised a Climate Emergency and climate change. Promoting significant housing development in remote rural areas with poor transport links, low levels of local employment, poor infrastructure and limited amenities, will result in significant levels of car usage and will not meet carbon reduction.

CDC Climate Emergency Policy states:

'Locating development is the heart of the plan making process. The following are all top priorities in plan making;

- Reducing the need to travel to access shops, employment, and facilities.*
- Providing development in locations where there are ample opportunities to walk, cycle and use public transport, rather than car use being the only reasonable option'*

Alternative means of heating housing is limited, there is no natural gas supply, and the electrical supply can be easily disrupted with overhead cable supplies. Accordingly, new housing is likely to be less carbon efficient compared to housing in urban areas.

South Downs National Park (SDNP): The Parish adjoins the SDNP, and part is within the Park. The Parish is important in preserving the setting of the Park. The Parish has been recognised as being remote and tranquil and has good levels of biodiversity with low density small villages and hamlets. The Parish predominantly has dark skies and limited light pollution. This helps to support the Park; nature does not recognise arbitrary man-made boundaries and makes no distinction between this Parish and the Park. There is therefore a duty to work with the SDNP Authority to provide protection of the Park.

Conclusion

The Parish Council does not dispute the need to provide good quality affordable housing and some *limited* growth in the Parish could be beneficial. But the local housing need in the Parish is very limited. From information gathered through drafting the Neighbourhood Plan, only a small number of housing units are potentially needed being primarily affordable housing, made up of smaller housing units of 1 - 3 bed and particularly housing suited to meet the needs of the aging population. Therefore, the proposed larger housing numbers do not meet a local housing need, but rather a District wide or National need. The social and infrastructure limitations and the environmental impact detailed in this document must throw considerable doubt that allocation of large-scale development to this rural Parish is a rational, well balanced and above all a sustainable response, within the parameters of the NPPF and the adopted and emerging Local Plan policies, including the supplemental planning documents that the Council has prepared to plan for development in its area.

Yours sincerely



Catherine Nutting, on behalf of Plaistow and Ifold Parish Council

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