



Alicia Snook
Planning Officer
Chichester District Council
East Pallant House
1 East Pallant
Chichester
PO19 1TY

16th April 2026

Dear Alicia Snook

Planning Application Reference: 26/00403/FUL
Land South Of Common House Road Plaistow West Sussex
15 o. dwellings and associated works

The parish council **OBJECTS** to this application and asks that it be refused.

As you will be aware the proposal is essentially a repeat submission of application 25/00443 which was refused by Chichester District Council (CDC) in June 2025.

In summary (and in our words), the reasons for refusal were:

- the site is outside of any settlement boundary and not allocated for development in any part of the development plan;
 - the development would result in harm to the landscape character of the area;
 - the proposal would cause harm to the setting of the Plaistow Conservation Area and to Stone House, a Grade 2 listed building;
 - the application does not demonstrate how water neutrality would be achieved and fails the Appropriate Assessment undertaken by CDC;
 - the potential adverse impact on protected species, in particular bats, reptiles, dormice and great crested newts had not been properly assessed or mitigated;
 - the proposed drainage strategy was inadequate and did not demonstrate that the risk from surface water flooding would be safely managed;
 - the absence of a Section 106 agreement to provide the possibility of scrutiny for policy compliant affordable housing and other infrastructure
1. A fundamental problem with the June 2025 application was that much of the supporting evidence provided was either superficial, incomplete or out of date. This was identified by the parish council, by a number of other consultees and noted in the officer report. Despite this, the resubmitted application largely recycles this material, even where it was explicitly criticised as inadequate, and provides only limited and selective new information.
 2. It is the responsibility of an applicant to make the case for their proposal and to demonstrate how they satisfy all relevant policy requirements. This is particularly true where the application site is sensitive – as it is here - and requires the most thorough consideration.

3. Demonstrating water neutrality is no longer a requirement following the withdrawal of Natural England's Position Statement in October 2025, but the application seems to have been resubmitted on the assumption that little or no work is required to address the other reasons for refusal. The failure to demonstrate water neutrality and consequent failure to satisfy an Appropriate Assessment was in fact just one of a number of important policy conflicts which led to that decision.
4. The resubmitted application still fails to engage with the majority of the issues raised by CDC's earlier planning judgement and certainly does not demonstrate how they have been resolved. It provides a limited amount of new information (the quality of which is itself an issue) but relies on much of what was offered previously even where it was criticised first time around. We also understand from the applicant that an issue has arisen in relation to their ability to satisfy the policy requirement for affordable housing which has not been covered in anything submitted so far.
5. The parish council's position in relation to this proposal therefore remains as it was to the previous application, especially having regard to the latest policy position.

Principle of Development

6. The Chichester District Local Plan 2021-2039 (CDLP) was adopted in August 2025. Although the wording is different from that of the plan against which the previous application was assessed, the principle constraints and requirements are the same. Nothing in the policies of the recently adopted plan alters the basis for CDC's previous decision. National planning policy is also unchanged.
7. The new plan does confirm the housing requirement for the parish of Plaistow and Ifield of 25 dwellings. The parish council will not be allocating sites in a forthcoming neighbourhood plan and it is therefore to be expected that speculative applications will come forward to meet that requirement. The parish council will respond to these on their merit based on local concerns and relevant planning policies. The application site is one which might have potential for limited development if a sufficiently sensitive and well designed proposal were to be put forward.
8. However, part of the site is elevated above surrounding land and the site itself is in close proximity to the Plaistow Conservation Area. This means that the design and layout of any scheme must be very well considered and robust evidence provided to demonstrate that it will be acceptable. Other issues such as ecological impact (including impact on European sites), drainage, flood risk and highways impact must also be satisfactorily resolved.
9. Notwithstanding the requirement for additional housing in the parish set out in the local plan, the new application must be refused because it falls far short of being a policy compliant scheme and simply repeats many of the errors and shortcomings of the previous submission.

Landscape and Heritage

10. The Landscape and Visual Assessment (LVA) being offered is the same as that which accompanied the previous application. It was completed in 2020 and assessed a different development which occupied only a part of what is now the application site. An 'addendum' has been provided which claims that this LVA can somehow be considered appropriate in relation to the current scheme.
11. That is obviously wrong. The addendum is not dated, nor is it signed. There is no indication that it is has been produced by a qualified landscape professional who is able to justify the statements it contains, and we assume that no such professional would do so. An LVA produced in 2020 for a different scheme on a smaller area of land cannot possibly be considered as a reasonable basis to assess the visual and character impact of the proposal.
12. The failure to provide a credible landscape assessment was important in CDC's judgement of the previous application. The officer report says that:

It is considered that there is a high probability that the proposed site would be visually dominant and also visible from public viewpoints around the site. This would result in a significant negative change to the character of the application site...¹

13. Given that the new application is essentially the same design and layout and in the continuing absence of an LVA adequate to demonstrate otherwise, this analysis must be unchanged. A reason for refusal based on a conflict with Policy NE2 of the CDLP must therefore still stand.
14. The lack of an adequate LVA also has consequences for the assessment of the impact on the Plaistow Conservation Area and the setting of Stone House (a Grade 2 listed building). The application is accompanied by a heritage statement (although it not produced by a heritage expert), but it cannot be considered suitable for decision making purposes without a proper understanding of the visual and character impacts provided by an LVA. This creates the same policy conflict that arose before where the officer report concluded on heritage impact:

Without an understanding of the proposed levels and an accurate and comprehensive LVIA it is therefore not possible to conclude that the proposed development through the impact on its setting, would preserve or enhance the character and appearance of the Conservation Area²

15. It went on:

..it is considered that the less than substantial harm that has been identified to the grade II listed building is of greater weight [than the modest public benefit], and accordingly the impact constitutes an overriding reason for refusal.³

¹ Officer report 20th June 2025 Page 18 Paragraph 6

² Ibid, Page 20 Paragraph 5

³ Ibid, Page 20 Paragraph 6

16. Just as before the application is in direct conflict with the relevant heritage policies of the CDLP, which are now P9, P10 and P11. There can be no justification for CDC to reach a different conclusion about the unacceptable heritage impact given that it is the same proposal and no additional information has been provided.

Ecology

17. The application relies entirely on surveys and proposals made in relation to the previous application, which were even then considered incomplete and inadequate.

18. No further surveys relating to bats, reptiles, great crested newts and dormice have been undertaken and therefore no suitable mitigation can be offered. Whilst the applicant does now propose a planted buffer strip around the development to provide for foraging bats, no details are provided as to how its effectiveness will be secured – for instance through limiting public access. It therefore fails to exclude the potential for an adverse effect on the Ebernoe Common SAC, Mens SAC and Singleton and Cocking Tunnels SAC.

19. There are no adequate proposals for the management or mitigation of the impact on other protected species.

20. As confirmed by the consultee response already made by CDC's environment officer, the applicant still does not know what the full ecological impact of the development would be and seems unwilling to find out. Despite the limited additional measures now proposed, this reason for refusal (now based on conflict with policy NE5 of the CDLP) remains and refusal on the same basis is inevitable.

Drainage Strategy

21. The application is now supported by a professionally produced drainage strategy, but questions remain regarding the discharge of surface water. The proposed discharge point is the watercourse to the north west of the site, the condition and flow direction of which is not explained in any detail. The discharge point is only marginally inside the red line boundary of the application site. Although the flow rate is proposed not to exceed the current total for the site, no investigation appears to have been made as to the implications of directing a large proportion of that flow to a single point on this watercourse. Land on Plaistow Green immediately opposite this point already becomes saturated after prolonged rainfall indicating that the watercourse has very limited capacity. It is difficult to understand how it could support additional flow without adverse effects on nearby land and possibly the development site itself.

22. Subject to the comments of the Local Lead Flood Authority it seems likely that the application still fails to meet the requirements of policy NE16 of the CDLP. At very least the applicant should be required to demonstrate how the watercourse will be improved and then maintained to ensure that it is effective, which may be difficult where it is not in their ownership or that of the highway authority.

23. According to CDC's own [CDC Surface Water and Foul Drainage Supplementary Planning Document](#) updated annually the estimated headroom capacity for the Loxwood area is 90 houses. Since October

2025 application 25/01686/OUT is pending consideration in Loxwood for an additional 223 houses and 19 additional houses on the site of Hawthorn Cottage 26/00176/FUL decision pending. The Plaistow and Ifold foul drainage feeds into the same treatment plant as Loxwood and from CDC's own appraisal has very limited further capacity. Despite Southern Water's offer of a connection a direct connection will not be possible for some time and as with the Loxwood developments on site storage facility will be required which will affect the viability of the site.

Lighting

24. We acknowledge that the officer report for the previous application concluded that there would be no impact on local dark skies, and that it was not a reason for refusal. However, we question whether it was really possible for that conclusion to be reached on the basis of the lighting assessment provided, which was not informed by an LVA and not prepared by expert consultants. No additional information has been provided with the new application, and we remain concerned that without a proper assessment it is not possible for CDC to be sure that no harm to dark skies would arise.

Highway Safety

25. Whilst we acknowledge that highway safety and the impact on the local highway network was not a reason for refusal of the previous application, our residents continue to be very concerned regarding the suitability of Common House Lane and the nearby junctions to deal with even modest levels of additional traffic.
26. The parish council has raised with the applicant the benefits of a footway being provided between the application site and the centre of the village. In our view this would be an entirely reasonable requirement to promote walking and to ensure pedestrian safety. We understand that it does create some difficulties if all of the land required is not in the applicant's control or is not highway land (assuming the highway authority is supportive) but we ask CDC to ensure that it is at least evaluated.

Affordable Housing

27. We have been told by the applicant that they have approached a number of affordable housing providers about taking ownership of a policy compliant level of on site affordable housing. Although we do not know the terms on which these discussions took place, it appears that none of the potential providers expressed an interest in taking on any new properties offered. We understand that this is now quite a common problem and you will obviously make your own enquiries.
28. CDC's policy in relation to affordable housing does seem to allow for negotiation over the nature of the affordable housing mix and possibly even, as a last resort an off-site contribution if this is the only way in which a contribution to affordable housing can be made – if the alternative is no development at all.
29. The parish council would expect that every avenue is pursued to achieve a fully policy compliant level of on-site provision. Given the other compelling reasons to refuse the application this is unlikely to be a major consideration. However, and for the record, we would prefer CDC to accept a slightly

lower total amount of affordable housing in total than to accept an off-site contribution which is of no direct benefit to the parish.

Summary

30. The conclusion of the planning balance exercise undertaken in respect of the previous application was summarised in the officer report as follows:

For the reasons set out above, the location, in combination with other concerns raised, are (sic) considered to constitute overriding reasons to refuse the application given the clear policy conflicts that have been identified which are not balanced by the benefits of the proposal.⁴

31. The limited benefits of the scheme remain identical and may be said to have diminished given CDC's improved housing land supply position. It can now demonstrate a five-year housing land supply and its policies in relation to housing are up to date. The policy conflicts when considered against the CDLP remain.

32. With the exception of water neutrality (which has been resolved by the withdrawal of Natural England's neutrality requirement) the application makes no attempt to address the reasons why the previous proposal was refused.

33. The application is contrary to the adopted development plan and relies on an outdated and inadequate Landscape and Visual Assessment which does not exclude the likelihood of unacceptable harm to the character of the landscape, the Plaistow Conservation Area, and the setting of Stone House. Ecological impacts have still not been properly assessed, meaningful mitigation for protected species is absent, and concerns remain unresolved in relation to drainage and surface water management. There is uncertainty over the delivery of policy-compliant affordable housing. Taken together, the proposal does not represent sustainable or acceptable development in planning terms.

34. For these reasons, the parish council respectfully requests that the application be refused.

Yours sincerely

J Bromley

Jane Bromley
Clerk & RFO: Plaistow and Ifold Parish Council

⁴ Officer Report 20th June 2025 Page 27 Paragraph 7