

Regulation 14 Plaistow and Ifold Neighbourhood Plan 2023- 2039 - Consultation on Pre-Submission Plan (February 2026) (Regulation 14)

Chichester District Council Response

General:

The Parish Council (PC) and Neighbourhood Plan Working Group are to be commended on their wish to produce a Neighbourhood Plan and the Parish Council's commitment to this work on behalf of the local community is recognised by Chichester District Council (CDC). The draft Plaistow and Ifold Neighbourhood Plan 2023- 2039 - Consultation on Pre-Submission Plan (February 2026) (NP) is generally concise although there are a few places where clarity could be provided. In particular this relates to the inclusion of various 'Aims' within the NP. Currently, these 'Aims' are interspersed through the NP but as they do not form part of formal NP policies they may be better located together in a separate section as an Appendix of aspirations/aims for the PC at the end of the NP.

MAKE CLEAR what the difference is between AIMS and Policies but leave as structured.

In relation to design and conservation, a particular issue for the PC, the NP adds a valuable layer of guidance to the resources available to planning officers and is generally in accordance with up to date policy.

However, in several places throughout the draft NP references are made either to the previous Local Plan or to a now out of date modification version of the new Local Plan. These should be updated and any relevant policies and text checked to make sure the references are to the new Chichester Local Plan 2021-2039 (adopted August 2025) and its policies. If any adjustments are required to draft NP policies and text as a result, then amendments should also be made to the NP.

UPDATED THROUGHOUT

As the Parish Council will be aware, the Government published its consultation on significant proposed changes to the NPPF in December 2025 and the consultation closed on 10 March 2026. Although there is no date yet for the publication of the final version, the Government's direction of travel to avoid duplication of policies in the development plan is clear. With that in mind, CDC advises that a careful review of policies and text is undertaken prior to the completion of the next iteration of the NP to avoid duplicating policies and guidance in the newly adopted Chichester Local Plan 2021-2039.

REVIEW ALL POLICIES AND AIMS FOR COMP. WITH NPPF 26- Is this only necessary where Reg 15 is after adoption of NPPF 2026 ?

The following suggestions reference opportunities elsewhere in the draft NP for improvements and clarity.

Page 5 para 1.6 Introduction

Amend text to refer to policies in the adopted Chichester Local Plan 2021-2039 rather than DPD.

COMPLETED

Page 7 para 2.19 – 2.25 Social and Economic Characteristics

It would help to provide the source of the figures that support these conclusions.

Page 9 Local Housing Need

Para 4.2 - update text to reflect the adopted Local Plan. (August 2025).
Line 3 – the footnote seems to have become lost and appears at the top of Page 10, however it is out of date in any case and should be amended. Similarly, the text referred to as para 5.9 of the LP is inaccurate and should be amended.

COMPLETED

Para 4.3 – missing word at the end of Line 4 - , should read ‘....contribute to....’

COMPLETED

Page 9 Policy H1 – Local Needs Housing

It is recommended the first sentence is omitted, and the policy wording is amended as shown below. This will avoid duplication with the Chichester Local Plan policy and for the avoidance of doubt in relation to offsite requirements on sites of 5 – 10 dwellings. It will also allow flexibility over the plan period as local housing needs may evolve over time, for example if a medium sized market led site or rural exception site were to come forward it may result in a material adjustment of housing need locally.

Amend Policy H1 to read as below:

~~Any housing development scheme of more than 10 units must have a percentage of affordable housing in line with The Chichester Local Plan 2021-2039 Policy H4.~~

‘All proposals for housing will be expected to comprise a range of tenures and sizes to meet the identified Parish housing need as evidenced in the Local Housing Needs Assessment APPENDIX A **(or its latest iteration as may occur over the plan period)** and the latest CDC Housing and Economic Development Needs Assessment (HEDNA) available at the time the planning application is submitted.’

UPDATED

Page 10 Policy H2 Housing Development within the Ifold Settlement Boundary

As written this policy is not clear as to what would be expected of an applicant applying for planning permission or what the policy is seeking to achieve in terms of new development. Suggest the policy is substantially reworked to be specific about what it is trying to achieve, for example is this to focus on the protection of the character and appearance of the area, specific features etc.

Discuss use in Policies of design guidelines

Some signposting may be included but this should be specific and make sure any signposted document/paragraph is sufficiently clear about requirements. For example, as written it is not sufficiently specific about boundary treatment, densification of existing plots, provision for altering house sizes (e.g. by way of subdivision or provision of smaller homes). Suggest the policy may be improved by being rewritten to be criterion based within the Neighbourhood Plan policy itself.

In addition, it is not immediately clear to which paragraphs the policy refers to and in which document. For example, looking at Appendix 1 the paragraph numbers do not immediately appear to reflect detailed design matters in a sufficient manner to indicate what an applicant should do. If it refers to paragraphs in the Neighbourhood Plan itself then the paragraph numbering does not correspond to design matters. It is not immediately clear from the policy wording what it is trying to retain about the character of Ifold, what it is open to enhancing and/or altering

Page 11 Policy H3 Housing Density & Design Principles

Suggest this policy would benefit from reworking its wording. If the intention is to seek to retain the existing character, it is not clear on how to approach a new development or if a development proposal should seek to enhance, retain or materially alter the character over time. As written the policy indicates what the current density is for a general area, however, it does not specify to what extent there is scope to deviate from that density and what level of intensification may be acceptable. It is also not immediately clear, and there is insufficient detail, as to the exact character areas that are specified.

As worded the policy provides a summarised character assessment of existing settlement fabric but does not indicate any direction for a planning applicant to follow in order to achieve a successful outcome. Although reference is made to the Design Guide, it does not provide any specific criterion as to how to approach a new development in any given location. Similarly, there is no guide to what an acceptable level of density may be, or what design features may or may not be appropriate. For example, it is not clear if contemporary design is acceptable, and it does not provide clarity if retaining and enhancing existing character is what the policy is seeking to achieve.

It may help to look at other NP examples of more criteria based design policies in other parish 'made' NPs such as Southbourne Modified NP and West Wittering NP, both available to the CDC Website [Neighbourhood Planning - Chichester District Council](#) However, it is also important to note that these NPs were 'made' prior to the adoption of the new Chichester Local Plan that also now contains detailed design policies in Chapter 6. As the NP needs to avoid repeating policies elsewhere, a key consideration must be as to what this part of the NP adds to the adopted policy position?

Discuss use of Design Guide

Page 12 Policy EE1 – Supporting the Local Economy

Remove if this is a duplication of LPA?

Wording needs to be amended to reflect the adopted LP but also question what this adds to the adopted policy position.

Page 13 Policy EE2 Retail Shop Premises

The footnote reference does not seem to appear on the page or elsewhere. Again, question what the policy adds to the adopted policy position.

COMPLETED

Page 14 Policy EE3 Brownfield Sites

Need to bear in mind this reads a generally permissive policy and applies to all brownfield sites whether in or out of a settlement boundary, is that the intention?

Again, question what this adds to the adopted policy position

What are the implications as brownfield sites exist or have potential to exist throughout parish?

Page 15 AIM CAR2 – Non-Designated Heritage Assets (and Appendix D Non-Designated Heritage Assets and Applicable Criteria)

This confirms we have carried out the correct process to meet even Policy Level. PC to decide.

Should this be a policy rather than an aim?

Non-Designated Heritage assets – The plan uses the selection criteria developed by CDC's Conservation and Design team. They have included a list of assets, and from the Conservation and Design Manager's assessment these are all worthy to be added to CDC's own records. Regarding designated heritage assets, this part of the plan is in accordance with the local plan and national policy

Para 6.3 line 2, amend to read 'These buildings **have** been assessed....' **COMPLETED**

Page 16 Policy FR1 – Flood Risk and Foul Drainage

Local problem how to word?

Again, question what this adds to the adopted policy position

Page 18 Policy EHS1 – Ensuring Highway Safety

Again, question what this adds to the adopted policy position **Resident would expect should we make the Policy more specific to the area- examples of areas at risk.**

Page 19 para 8.19 Public Transport

Would help to mention how the PC might link to community transport options as an alternative to public transport. Good examples in the area would be Tillington Local Care and Community Transport Sussex.

Updated to include community transport in wording.

Page 21 Policy LGS1 – Local Green Spaces

The second sentence is not needed as the designation criteria are set out in the NPPF.

COMPLETED

Page 22 Map 5 Plaistow Local Green Spaces

The map is labelled to the right in error as Map 6; this needs to be deleted.

COMPLETED

Page 23 Section 9 Monitoring and Delivery

Paras 9, 9.3 and 9.4 need to be amended, as relevant, to reflect the most up to date position as the Chichester Local Plan 2021-2039 and the adopted South Downs Local Plan 2014-2033.

COMPLETED

Appendix A Design Guidelines

Design Guide / Codes – this section is modelled on the National Model Design Guide / Code and accords with all the key principles contained within those documents. It is also in accordance with the principles and practice of high quality urban design that the conservation and design team use when in negotiation with applicants. Of particular note are the detailed diagrams and models that are granular enough to show small extensions to individual house, these diagrams are clear and fair.

Appendix D Non-Designated Heritage Assets and Applicable Criteria

See comments above under Page 15 AIM CAR2 – Non-Designated Heritage Assets

Exercise of Delegated Authority – Director of Planning and Environment

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 **Regulation 14 Plaistow and Ifold Neighbourhood Plan 2023- 2039 (February 2026)** 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:

A handwritten signature in black ink that reads "Andrew Frost". The signature is written in a cursive style with a horizontal line under the letter "t".

Director of Planning and Environment

Date: 16 March 2026