



**Horsham
District
Council**

Representation Form

West Chiltington Neighbourhood Plan (2031) Regulation 16 Consultation - The Neighbourhood Planning (General) Regulations 2012 (as amended)

West Chiltington Parish Council has prepared West Chiltington Neighbourhood Development Plan (WCNDP). The Plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

In accordance with Regulation 16 of the Neighbourhood Planning Regulations 2012 (as amended), the West Chiltington Neighbourhood Development Plan and associated supporting documents will go out to consultation from **18 October 2024 to 29 November 2024** for 6 weeks inviting representations on the submission draft WCNDP, basic conditions statement, consultation statement and the SEA/AA and HRA assessment. Copies of the West Chiltington Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website and at selected deposit points. To view the plan, accompanying documents and to download the comment form please view:

<https://strategicplanning.horsham.gov.uk/WestChiltingtonReg16/consultationHome>

Hard copies of the documentation are available upon prior request for inspection at **Horsham District Council offices**; Parkside, Chart Way, North Street, Horsham, RH12 1RL between 9am and 5pm Monday to Friday (01403 215398), **West Chiltington Parish Office**, The Parish Office, Church Street, West Chiltington, RH20 2JW, Opening 10am-1pm Tues & Wed (01798 817434). **West Chiltington Village Hall**, Mill Road, West Chiltington, RH20 2PZ.

There are a number of ways to make your comments:

1. Download and complete the comment form available from the link above and email it to: neighbourhood.planning@horsham.gov.uk ; or
2. Print the comment form available to download by clicking on the link above and post it to: Neighbourhood Planning Officer, Horsham District Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

All comments must be received by 5:00pm on 29 November 2024

NOTIFICATION

All comments will be publicly available, and identifiable by name and (where applicable) organisation. Please note that any other personal information provided will be processed by Horsham District Council in line with the Data Protection Act 1998 and General Data Protection Regulations. Horsham District Council will process your details in relation to this preparation of this document only. For further information please see the Council's privacy policy: <https://www.horsham.gov.uk/privacy-policy>

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	Sean Davis
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	5/12/2024

PART B

To which part in the plan does your representation relate?

Paragraph Number:	3.44; 3.55; 4.2; 4.3 2c); 5.3; 6 a) b) & c)	Policy Reference:	H1; H2b Consultation Statement
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Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

Section 1

Housing Needs and Developments

- The draft Horsham District Council (HDC) Local Plan (February 2020) suggested that West Chiltington Parish contribute 25 new dwellings over a 15-year period.
- This figure is based on a 2011 housing needs survey and subsequent updates but does not appear to consider the numerous developments already delivered since that time, including:
 - Threals Lane: 13 dwellings on two sites
 - Common Hill: 8 high-priced apartment dwellings (exceeding £400,000)
 - Steele Close: 14 affordable dwellings
- The cumulative effect of these developments questions the necessity of further allocations without updated evidence of local housing needs.

Employment and Enterprise

- The draft Plan mentions Harwoods as a major local employer planning relocation in the Parish, expected to bring new employment opportunities.
- This is contested as factually incorrect: Harwoods, after 60 years in Pulborough, have now ceased their business activities in that area. Thus, the cited employment benefit no longer stands.

Vision and Core Objectives

- The Plan's Vision (4.2) seeks to preserve the Parish's rural character, tranquility, biodiversity, and sense of place.
 - The inclusion of the Smock Alley site directly conflicts with this vision as it would compromise the relationship between the village and its surrounding countryside. This is supported by previous appeal decisions that have recognized the area's rural setting and the importance of its undeveloped landscape.
 - Core objective (2c) aims to protect and enhance the Parish's biodiversity and rural setting. By introducing development on the Smock Alley site—which has naturally rewilded over time—biodiversity would be harmed and the rural setting degraded.
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Section 2

Sustainable Development (NPPF Principles)

The Neighbourhood Plan references the National Planning Policy Framework's (NPPF) three overarching objectives of sustainable development—economic, social, and environmental.

Economic Objective

- The Smock Alley proposal does not provide jobs, growth, or local economic benefits. It adds housing without associated infrastructure or employment.

Social Objective

- The site's isolation, lack of pedestrian infrastructure, and limited access to public transport mean new residents would rely heavily on private vehicles. This setup fails to support a strong, vibrant, and well-connected community environment and does not meet modern sustainability or accessibility criteria.

Environmental Objective

- Developing a currently rewilded and biodiverse site would harm rather than enhance the natural environment.
- Increased reliance on private vehicles would lead to more pollution and waste and runs counter to climate objectives promoting a low-carbon future.

As presented, the Smock Alley inclusion fails the NPPF's sustainable development principles on all three counts.

Housing Policies

Objectives

- Meeting identified local needs: The Smock Alley allocation is based on outdated housing need data. Since local needs have not been reassessed considering recent developments, the justification is unsound.
- Respecting character and heritage: The proposal introduces a dense, estate-style development out of keeping with the established pattern of individually accessed properties. This would undermine local distinctiveness and the rural, verdant character of the area.
- Contributing to infrastructure and facilities: The development does not propose meaningful contributions that would address local infrastructure deficits or enhance facilities.

Policy H1 (Spatial Strategy and Built-Up Area Boundaries)

- (a) Location: The Smock Alley site falls outside the established Built Up Area Boundary, conflicting with Policy H1.
- (b) Identity: It does not respond to the distinct identities of The Common and The Old Village as set out in the Parish's Landscape Character Assessment.
- (c) Landscape Setting: The development would have a detrimental impact on the open and undeveloped character of the broader Parish.
- (d) Water Efficiency: Claimed mitigation measures related to water neutrality and compliance with habitat regulations (Arun Valley SAC/SPA/Ramsar) are not proven with the required certainty, failing the precautionary principle outlined by Natural England.

The inclusion of the Smock Alley site in the 2021 draft was a decision made by the Parish Council Planning Committee, not the local community.

This decision was:

Agreed upon on 11 February 2021 without consulting parishioners or seeking their input.

Communicated to adjacent residents via a letter dated 3 June 2021 after the site selection decision had been made.

Confirmed in a survey sent to parishioners on 26 July 2021, long after the site had been approved for inclusion in the plan.

This timeline demonstrates that residents were informed only after the decision had been made, undermining the fundamental requirement for inclusive and transparent consultation.

Conclusion

The evidence presented strongly suggests that including the Smock Alley site in the West Chiltington Neighbourhood Plan is contrary to the Parish's stated vision, core objectives, sustainability aims, and established planning policies. The development runs counter to local character, compromises environmental quality and biodiversity, does not reflect actual contemporary housing need, and fails to provide the social and economic benefits required of sustainable development.

It goes against the will of the local community that have opposed the inclusion of this site for over 10 years

Whilst I would like to critique the whole document, I cannot continue as there are too many contradictions, misleading statements, and communications that shows the decision to include sites was made by the Parish Council in collaboration with Horsham District Council not the local community so I consider the whole plan unfit for purpose

What improvements or modifications would you suggest?

Removal of the Smock Alley site from the plan

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Do you wish to be notified of the local planning authority's decision under Regulation 26 of the Neighbourhood Plan (General) Regulations 2012 (as amended) in relation to the West Chiltoningon Neighbourhood Development plan?

Please tick here if you wish to be notified: