

Clerk to the Parish Council
West Chiltington Parish Council

Our ref: WCNDP
Your ref: n/a

Date: 1 December 2024

By Email.

**Re: Representations to Submission Draft West Chiltington Neighbourhood Plan
(Regulation 16)**

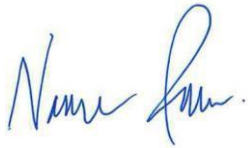
Thank you for consulting Horsham District Council on the West Chiltington Submission Neighbourhood Plan. Horsham District Council is supportive of the Parish Council's work to develop their Neighbourhood Plan. We recognise that the Parish Council has undertaken a significant amount of work to reach this particular point and should be commended for all their hard work. The Council's detailed comments on particular policies are listed in the schedule attached to this letter. In addition, we wish to make the following general comments to the Submission West Chiltington Neighbourhood Plan as part of our response:

1. West Chiltington is identified as a Medium Village in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate their fair proportion of the minimum 1,500 dwellings to be delivered from neighbourhood plans across Horsham in accordance with Policy 15 (4). Horsham District Council agrees with the quantum of housing set in the West Chiltington Neighbourhood Plan namely the delivery of a minimum of 29 dwellings allocated across two sites in the parish.

2. There is an opportunity for a full or partial review of the West Chiltington Neighbourhood Plan once the Local Plan Review has been through the legislative process and is suitably mature to provide the certainty for local groups to embark on a review of individual plans. The Local Plan Review may increase housing numbers within West Chiltington parish, and we will continue to keep all of our community groups and neighbourhood plans informed of the Review's progress.

If you have any further questions regarding this representation or any of the comments submitted by Horsham District Council officers, please do not hesitate to contact the Council.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Norman Kwan'.

Norman Kwan
Senior Neighbourhood Planning Officer.

**Horsham District Council Comments to the Pre-submission Draft
West Chiltington Neighbourhood Plan (WCNDP)**

1 December 2024

NP Paragraph No. / Policy No.	Suggested Change / Comment
General	To ensure the plan is legible and can be used for decision making purposes, we consider the plan would benefit from greater resolution regarding policy maps and highlighting landuse information. We also consider clearer line boundaries should be provided for the site allocations, wildlife corridors and Local Green Space designations to ensure there is no ambiguity when considering land use.
Habitats Regulations Assessment (HRA) including Appropriate Assessment (AA)	We note the conclusions of the HRA. All new development must be in conformity with the Habitat Regulations which requires all development to be water neutral.
Policy H1	Policy H1 (b) It would be of benefit to reference the Landscape Character Assessment in full or in the supporting text as it is useful for decision makers. Parts (a) and (e) are similar and could be merged.
Policy H2	The Council welcome the positive allocations put forward by the neighbourhood plan. Part 1 makes reference to Home Quality Mark (or similar standard), the council considers the policy would benefit from with the requirement to reach level 3 or 4 star rating to avoid confusion subject to viability. Part 2 (b) the policy would benefit from a reference made to achieving a viable efficiency standard linked to Building Regulations. Part 6 references a new edge to the 'parish'. It is advised this is amended to reference the 'village' edge to reflect settlement expansion in accordance with local plan policy. Part 5 and 8 should be merged. (a-d) of Part 8 is prescriptive a recommendation is to have all development to be landscape-led and not to detracted from the character or the local build vernacular (height, massing or materials) of the village.
Policy H3	The Council welcomes the design policy but notes part two of Policy H3 is prescriptive and specific. The installation of telephone and powerlines under ground may be possible in all instances so additional wording to include: <u>as much as possible</u> at the end of 2 (c) will bring some flexibility to the policy.
Policy EH1	The Council welcomes reference made to Biodiversity Net Gain. The council notes the 10% net gain requirement as stipulated in Policy EH1. The Council is seeking to increase this requirement to 12% BNG but this proposed increase of 2% must be ratified through the local plan examination process before it can be enforced.
Policy EH2	Part 1 of Policy EH2 repeats national policy. Part 2 references the NPPF. With the update to the NPPF, references made to the NPPF paragraph numbers will have to be changed to avoid any confusion.
Policy EH3	The Council acknowledges trees and hedgerow are integral to the character of a village and welcome due consideration of their retention as far as it is possible. Part 5 may not be feasible to implement on a parish wide basis, subject to viability. It is advised additional wording is supplemented in the policy 'as far as possible' to allow some flexibility.

Policy EH10	The delineation of the separation zone on policy maps should exclude the Neighbourhood Plan allocation (Smock Alley) to avoid confusion.
Policy EH11	The Council welcomes Policy EH11 to ensure all new development is in conformity with the habitat regulations all applicants must demonstrate water neutrality to ensure the integrity of the Arun Valley sites are upheld.
Policy GA2	Active Travel measures are supported by the Council to improve local connectivity. Policy GA2 appears to be in two parts. It is advised the policy is separated into two parts. Policy GA2 stipulates ' <i>Alterations and enhancements to footpaths, cycle paths and bridleways must ensure that they are adequately screened and fenced from existing properties</i> '. This may not be possible in all circumstances to apply appropriate screening and fencing. For clarification, the inclusion of additional text to state: 'as far as possible' at the start of the criterion to allow for some flexibility.
Policy EE1	The Council welcomes this policy but requires further clarification on what is 'acceptable' as a measure. It would be more appropriate to ensure development is in keeping with the character with of the locality.
Policy LC5	Local Green Space will be required to meeting the test as stipulated in the NPPF 2024 (Paragraph 106 – 108). Development should only be permitted in 'exceptional' circumstances.