



**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	Lawrence Hudson
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	5 th December 2024

PART B

To which part in the plan does your representation relate?

Section 1 of the submission draft WCNDParagraph.	Outdated Evidence Base <ul style="list-style-type: none">❖ Population Data: Section 3.❖ Housing Needs Surveys: Section 3.❖ Call for Sites and Assessments: Section 1, Paragraph 1.11 . Inaccuracies in the Plan <ul style="list-style-type: none">❖ Discrepancy in Number of Houses: Section 2, Paragraph 2.6 Publicity and Consultation Process <ul style="list-style-type: none">❖ Section 1, Paragraph 1.14 (consultation process)	Policy Reference:	
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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:

I wish to object to the Plan on the grounds that due process has not been followed (consultations etc) as well as the Plan being untimely (evidence not being sufficiently current) and hence not robust.

Specifically, the Housing Needs Assessment demonstrates a far higher need than the Parish Council accepts. Indeed, at one of the earliest consultations Horsham District wrote to inform West Chiltington Parish Council of a housing requirement. However, the Parish have stated that a requirement of less than half of that figure is agreed with HDC but no evidence has been provided to support this. The AECOM report itself states that a figure of 102 dwellings should be provided by 2031. The PC Neighbourhood Plan proposes 25.

HDC wrote to Mr Monks, then Chairman of WCPC on the 8th January 2018 (HDC Ref:WCNP_BC_061217) stating that “ it is therefore essential that a full and thorough re-consultation is held under these regulations. This consultation will need to ensure that all statutory consultees are formally invited to comment as well as all landowners and developers. To hold an ‘open’ consultation whereby the Steering group is inviting representations arbitrarily does not meet the legal requirements set by the Regulations.” We are land owners who answered the call for sites and appear on the assessments by AECOM. At no time have we been consulted with by anyone. We made the Parish Council aware that the details for us stated by AECOM were incorrect, as was the plan they suggested we had (namely the proposal was for 2 dwellings and retaining the current house which makes access tight but possible). We made the Parish Council aware that the plan would be to provide at least 12 dwellings, including social housing, and the removal of the existing house to provide a double width road, with pavement for pedestrian use. And yet none of this has been amended or reassessed. No one has contacted us, no one has consulted with us. Despite HDC clearly stating above that this would be a requirement. If they have ignored the due process and us, then how many others have they also ignored? How can any of their evidence (and thus conclusions) be trusted?

The lack of pre-Regulation 14 engagement directly violates the community-led principle of Neighbourhood Planning, as set out in The Neighbourhood Planning (General) Regulations 2012 and Government Guidance. This is what HDC made them aware of in their guidance and position letter as stated above, and yet the Parish Council has completely ignored this with impunity. Thus they have violated the Gov regulations and as such this current plan is not lawful and must be rejected.

Following AECOMs initial assessments the Parish Council “weighted” these and awarded points as to how each ranked. Despite the details being incorrect the assessments were not reconsidered and some sites were weighted negatively for reasons while other sites that had the same situations were not weighted at all.

Upon being asked as to who had made these calculations and what experience/qualifications they had for this the Parish Council have declined to provide any details of this or any minutes or records of any discussion nor criteria that had been used for these decisions and rankings. We do not believe that this demonstrates open, transparent process and we would ask that the Inspector, who has the powers to do so, request and review all and any such evidence as well as communications between AECOM and any Parish Councillor either acting on behalf of the PC or privately to assure that there has been no bias in this process.

I believe that the age of the evidence for the AECOM report (initially done 7 years ago and reviewed without any corrections or consultation 4 years ago) makes this no longer suitable for the purpose. And

that this has been done without the required diligence, which has led to the significant errors, and should be redone from scratch to correct these and make sure it is both up to date as well as following the required methods. Including consulting people.

I also believe that it is not robust nor acceptable to take previous requirements to be achieved by 2031 at the latest and then put them in a plan that effectively reduces these requirements further by requiring them to be met by many years later. The housing needs were to be met by 2031 and any time after that should and must require further needs (unless HDC now has an oversupply of housing). Unless this Plan is proposed to last only 6 years and a new one be made to start in 2031 with fresh proposals for the additional housing.

What improvements or modifications would you suggest?

That the submission be rejected. That the proposed Plan be reconsidered with up to date evidence, in accordance to all guidelines on consultations etc and with the raised errors corrected. That whatever housing requirements need be met and that the new plan is timely to its evidence and requirements. That it is done in an open and transparent manner so all decisions can be justified and seen to be without bias nor influence.

(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: