



West Chiltington Neighbourhood Plan Feedback

Overall the plan is well presented and has a clear structure. The document clearly outlines the evidence and issues of importance in the Parish before setting out policies to address these points.

There are however certain areas where we consider that the plan could usefully be amended before it is formally submitted for independent examination. This will help to provide additional clarity and strengthen the plan and reduce the number of modifications an independent examiner may be minded to make to ensure full conformity with the basic conditions. Further consideration of some of these issues may also help you to prepare for the forthcoming examination and any queries that an Examiner may raise

Chapter three - Plan Vision and Objectives

We are pleased to see that there is a clear vision which identifies the key challenges which are facing the parish in the future. This series of objectives which follows this is also a helpful structure as it sets out more detail as to how the vision will be delivered.

In some places, the wording of the objectives is very detailed, and in places perhaps could unintentionally be viewed as delivery mechanisms or policy requirements, which may have the potential to generate confusion once the plan is made. Some objectives could also be viewed as overlapping issues and it may therefore be useful to group these subject areas together. Further detailed comments are as follows:

Objective One - the objective to support local people to live in the parish is supported.

Objective three - As currently worded this appears to have a very similar aim to objective one. It would assist the flow of the document if these two objectives are grouped together.

Objective 4: The need to protect the character of the village is recognised and supported. As currently worded this objective has a high level of detail that is then not reflected in the planning policy section. If addressed (eg in the design policy) this would help to ensure that this matter is given greater consideration and weight in directing development.

Objective 5 - The specific traffic issues in West Chiltington Parish are recognised. It may however be beneficial to amend the wording of this objective slightly to give it more of a development focus. This may help provide a mechanism to amend later policies in the plan to require transport enhancements, and enable the policies to be located in the 'statutory' section of the document. This could be along the lines of "To secure improvements to developments, policies and practices to protect"

Objective 7 - As currently worded this appears to have a very similar aim to objective five. It would assist the flow of the document if these two objectives are grouped together.

Issue 10: The Natural Environment - first paragraph - it is stated that the South Downs National Park and High Weald are considered of international importance. Neither of these sites are designated as an international site, and these should be referred to as nationally important sites.

Objective 10, 11 and 12 - The wording of these three objectives are very specific, and some of the wording is more traditionally found within a planning policy or as specific delivery mechanisms to achieve a policy aim. It may therefore help to strengthen the effectiveness of this plan if some of this detail is moved into the planning policies themselves with the objectives containing slightly more detail. For example objective 10 could state something along the lines of

“To secure through development, the conservation and enhancement of the local environment including biodiversity, rural character and habitat maintenance.” Specific requirements to contribute to habitat corridors, Monkmead woods could be requirements of the policies themselves.

Objectives 14 - 17 - As you are already aware should be noted that the issues of mineral extraction lie outside the remit of neighbourhood planning. It is noted that these issues are dealt with in a non-statutory section at the end of the document, and we are pleased to see that this has been made clear at this point. It is hoped that an examiner will be supportive of this approach but there is still a risk that it is recommended that this section be removed from the plan.

Chapter 4 - Development Strategy and Proposals Maps

The identification and allocation of sites is welcome and is supported by HDC. Some of the issues relating to these allocations are set out in the formal policies, but this section also contains some detail that is not contained in the later part of the document. It is therefore recommended that there would be greater clarity to the document if this section and the housing policies were set out in a single section. This is similar to feedback that has been provided by Examiners to other neighbourhoods in terms of the layout and presentation of their plans.

One key point that we wish to make is that these allocations seek to phase development over the plan period. To date, Examiners of Neighbourhood Plans have recommended that phasing elements of housing allocations are deleted. You may therefore wish to consider deleting the references to phrasing, or alternatively seek to ensure that you have clear evidence to demonstrate why it should be retained.

This section (or the policy itself) does not provide an indication of the type or size of the properties to be built on the site, which would assist developers and development management staff. It would therefore be useful to set this out if possible.

Chapter 5 - Policies

It is noted that in the introduction to this section a Settlement separation zone is identified on a location map. There is however no specific policy allocation in relation to this area and it therefore would hold limited weight as drafted. It is therefore suggested that this zone is specifically allocated with an indication of the key features that should be protected from development (eg lighting / narrow lanes).

Policy ECD1 - We are supportive of the overall thrust of the policy and the desire to encourage businesses within the Parish. It may be beneficial to tighten up wording in places to ensure that the policy is phrased as positively as possible. An example wording is

“Development proposals will be expected to provide broadband and supporting communication facilities to ensure that the business accommodation provided is of a high quality”.

You may also wish to consider if there are any sites in the more rural parts of the parish that may be suitable for business / farm diversification and whether there are any specific policies that meet the objectives that you have identified.

Policy H1 - As set out earlier it is suggested that this section is merged with the allocations in chapter 4. It is noted that the justification refers to downsizing requirements. You may wish to consider if the policy should require any specific requirements to meet the needs of this particular group of (likely older households) to ensure that it meets their needs. It may also be worth considering how this policy meets the identified housing requirements for the Parish.

Policy H2 - Having spoken with the Housing department at the Council, it has been confirmed that the allocation of local affordable housing is undertaken in accordance with the allocations policy set by this Council and it is outside of the planning process. This policy should therefore be moved to the non-statutory section of the plan.

Policy E1 - the intention to ensure the protection of Monkmead woods is supported. It is suggested that this policy could be strengthened to include some of the other specific features of biodiversity and landscape importance currently identified in the objectives. With regard to Monkmead Woods, it is suggested that you may wish to consider whether it would be appropriate to designate this site local greenspace (see para 76 and 77 of the NPPF), although we would suggest that you consult with our colleagues in leisure if you wish to pursue this approach. There may also be other locations in the Parish that you feel could benefit from such a designation. Many other Parishes in the District have pursued this approach, including Storrington and Thakeham.

Policy DC1 - The Council is supportive of the desire to conserve and enhance the historic character of the parish . You may wish to provide further clarity of any specific features that you consider are locally distinctive in the parish (eg building materials). You may also find that it would strengthen your policy if you provided an indication of the undesignated heritage assets that you consider would be particularly important to protect - this could perhaps be set out in an appendix. This policy may also be an appropriate point to cover the issue of character of residential gardens to provide mechanism to protect this feature which has been recognised as being of particular importance to the Parish.

Policy CP1 - the requirement to ensure that development provides sufficient infrastructure to support development is supported. It is noted that the policy provides a clear steer as to the type of infrastructure which would be supported. It is suggested that it may be helpful to set out some more detail on this, perhaps in a supporting document or an appendix. This could perhaps include some of the specific projects currently identified in the objectives (such as the proposal to re-route buses to include Pulborough Medical Group surgery).

Non Statutory Policies

We are pleased to see that WCPC has set out the policies which are not strictly land use related in a separate section of this plan, and we are aware that some Examiners have suggested this as an approach. There is however still a risk an Examiner will recommend that some of these policies are removed from the plan. Notwithstanding this point however, we recognise that these issues are of importance to the Parish, and we have made some suggestions where the wording of the policies could be revised to incorporate a land-use planning focus, and therefore potentially move to the statutory section of the plan.

T1 and T2 - We recognise that there are significant concerns regarding transport issues in the wider area. It is therefore suggested that a transport policy (which could form a statutory part of the plan) could be devised which could cover many of the issues set out in T1 - T4. As an example wording could be along the lines of

“Development proposals will be supported where it can be demonstrated that they will retain the existing character of the rural road network of the Parish. Proposals will also be supported where they provide opportunities for walking and cycling, particularly where they provide contributions to the maintenance and enhancement of footpaths and bridleways.”

Other aspects of these polies (T3 / T4 could remain non statutory or be incorporated into the supporting text of such a land use policy where it would have greater weight in terms of how it may influence development.

TI 5 - Broadband -

As worded the inclusion of this policy is correctly included in the non statutory part of the document. It is again considered that it may be possible to reword some of the requirements of this policy so that they have a stronger land-use component. You may wish to view other policy examples such as that proposed by Thakeham PC and the comments made by the examiner in the health check on this plan.

Sport Recreation and Communities

The need to deliver infrastructure is picked up in CP1 - this section may add a useful layer of information (perhaps together with specific schemes in the objectives) about specific projects which would be supported through CIL or S106 contributions. You may find it beneficial to insert a cross reference to this section in the document as part of the reasoned justification of CP1.

Sustainability Appraisal

The Plan is accompanied by an SEA/SA. We consider that this document is thorough and is proportionate to the level of development proposed. The document assesses the emerging policies against objectives and determines whether impacts would be positive or negative.

We are pleased to see that the appraisal considers a number of possible alternatives to the plan, which is often an area where neighbourhood plans are challenged. It is suggested that it would be beneficial to undertake further work on the various alternative development sites that have been proposed to the parish, and to ensure that the results of these site assessments are documented on an individual basis (rather than as groups of

sites), and an opportunity for consultation on these options given as appropriate. You may feel that this could be undertaken as a separate process that is subsequently cross referenced in the SA/SEA which is an approach which has been taken by other Parishes in the District.