

Report on the issues arising from the public consultation on the pre-submission version that ran from 4 July to 31 August 2015 with regard to development strategy and policies.

Introduction

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WEST CHILTINGTON NEIGHBOURHOOD PLAN

Summary report of development issues from the public consultation on the 2015 pre-submission version.

Site	Support	Oppose
Steele Close	12	3
Hatches Estate	4	40
Smock Alley	8	20
Other sites	3	

These figures do not include the seven respondents who expressed themselves as supportive of the plan as a whole but who made no specific comment about any particular site. These may be presumed to support the published policy and represent support for Steele Close and Hatches Estate and accepting of the exclusion of Smock Alley.

4. Some responses specifically referred to the strategy. Other responders made their main comment by reference to specific sites and their place in the Site Assessment Report rather than in the WCNP itself. Others made general comments without specifying which part of the plan was being addressed and an interpretation has had to be made. A number of responses displayed partial satisfaction or appeared to be inconsistent as between their overall response and individual policies. In the table that follows responses have been allocated so far as possible to the topic that the responder indicated with general comments or comments about Policy H1 allocated to individual sites.

WEST CHILTINGTON NEIGHBOURHOOD PLAN

Report on the issues arising from the public consultation on the pre-submission version that ran from 4 July to 31 August 2015 with regard to development strategy and policies.

Introduction

1. This is the separate paper referred to in para 115 of the main representations report dealing with Chapter 4 and development policies in Chapter 5 on the WCNP.
2. Representations were made in respect of the strategy, the choice of sites, the allocated sites, and the site assessment report as well as in respect of sites not available for development at the time the site assessments and WCNP were prepared. They are all brought together here.
3. From the responses a numeric measure of the support or otherwise of the WCNP development proposals can be set out although its significance is a matter that will need to be considered further. The basic numbers are.

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4. Some responses specifically referred to the strategy. Other responders made their main comment by reference to specific sites and their place in the Site Assessment Report rather than in the WCNP itself. Others made general comments without specifying which part of the plan was being addressed and an interpretation has had to be made. A number of responses displayed partial satisfaction or appeared to be inconsistent as between their overall response and individual policies. In the table that follows responses have been allocated so far as possible to the topic that the responder indicated with general comments or comments about Policy H1 allocated to individual sites.

5. The structure of what follows uses the individual sites as reference points and wider policy issues are dealt with separately. The comments are all summarised but the full representation can be seen in the record of representations. As with the main report no comment is made on the representations save for para 5 below.
6. There are a significant number of comments drawing attention to perceived inconsistencies between the WCNP and the Site Assessment Report. This reflects a complete lack of understanding of the origin and function of the various documents and it will be addressed when considering the responses to this report and in the Consultations Statement. The comments do however indicate the respondents view in relation to the Smock Alley site and have evidential value in that regard.
7. Unlike the main report no proposals are made at this stage in respect of the representations in respect to the parish council's desire to have complete control over development issues. Proposals could be inserted if the parish council so requests.

	Index	RAB	Comment
A			Steele Close
	5	R	The sites proposed for developing Steele Close and The Hatches need a lot more thought. For example, the Steele Close site would be better with its own separate entrance via the nursery.
			The limitations of Juggs Lane in particular need very careful consideration.
	7	R	The site for Steele Close is probably going ahead. With which I have to agree is fine. The problem is access, with Juggs Lane and all other roads leading to it being single track, and are just not capable of taking any more traffic. Let alone the amount of lorries and heavy goods vehicles, which has dramatically increased over the years, causing even more serious problems, if the access is not changed.
	8	R	I refer to the consultation for the draft Neighbourhood Plan. We are pleased to note that land off Steele Close is the preferred site for development, and that this should be for affordable housing to meet identified need.
			However, it should be noted that in order for this to be viable for an affordable housing development it will be necessary to include a plot for one private house within the Sinnocks Nursery land, adjacent to the present dwelling on that land.
	14	R	Supports inclusion
	22	R	
	33	R	Concerns over traffic and inadequacy of Juggs Lane in particular

	Index	RAB	Comment
	41	R	Believes the Steele Close site should be developed, but it should ensure ALL of the affordable homes go to local residents. Only if this need is not met should further SUSTAINABLE development take place.
	51	A	Supports proposals other than Hatches
	76	R	Before this all goes ahead, the entrance to The Juggs should be widened and Juggs Lane. Also should be offered to young families from the village or that have had to move out of the village.
	78	R	Opposes. Largely concerned with the site being accessed by only single carriage roads and the high concentration of council/cheap houses/flats in the same area.
	88	R	Supports as such homes are badly needed
	92	R	Steele Close much better sites available in West Chilton. Access via The Juggs & Juggs Lane not acceptable.
	93	R	Most people in The Juggs agree, but are against the access through The Juggs
	94	R	Supports strongly need for additional housing
	95	R	Proposal well considered. Supports affordable housing and this site
	96	R	Supports as meeting affordable homes need
	B		Hatches Estate
	5	R	The sites proposed for developing Steele Close and The Hatches need a lot more thought. For example, the Steele Close site would be better with its own separate entrance via the nursery.
			Some of the infrastructure issues of Steele Close are relevant to Hatches
	7	R	The Hatches site also needs to be looked at again. There is a problem now, with children being dropped off, and picked up from school, with the roads being completely blocked at times.
	14 22	R R	Supports inclusion
	21	R	Argues that the development would be contrary to DC12 policy of HDC and NPPF paras 131 an134
	21	R	Objects on grounds related to: <u>Biodiversity</u> – narrow Broadford Bride Road – tree canopies – dormice – mature trees for bat roosting – badger setts <u>Landscape and heritage</u> – visibility from two PROW – Policy 4(e) of HDPF – impact on listed building at Huntley's Fruit Farm contrary to para 134 of NPPF – impact on the Conservation Area -

Index	RAB	Comment
		<u>Flood risk</u> – Flood Zone 1 – surface water flooding – <u>Highways and Infrastructure</u> – access issues and 11 TPOs – comparison with VS11 and VS13 <u>Impact on residents</u> – proposal discriminates against the north of the built up areas – unsafe walking routes <u>Lack of sustainability</u> – loss of agricultural land – contrasts with other sites that have no economic value
		Suggests that there are four other sites marked as unavailable without detailed explanation
		A proposal for 15 dwellings at Hatches Estate in what would effectively be a backland position relative to the Conservation Area would not comply with the aims and objectives of this policy (DC12 of HDC Core Strategy)
		It is not considered that the public benefit arising from the development of this site would outweigh the harm to the Conservation Area and Listed Buildings within and surrounding the site. Conflicts with NPPF 131 and 134
25	R	Disagrees with choice of Hatches over Smock Alley because of a lack of objectivity but 'accepts both' sites are developable and prefers Smock Alley if only one should be developed
26	R	Tenant of the land
31	R	Hatches to be excluded if Smock Alley is because the latter is the better site
34	R	Subscribe to the common form objection shown below but also
35	R	questions why the WCNP did not resolve the constraints that it drew attention to in its policy statement
41	R	Hatches Estate if developed should be limited to 11 dwellings, which is the threshold for affordable properties (10 or more) under current government legislation, 15 is too dense for the plot and not in keeping with the surrounding area. The surrounding fields should be protected from further development.
51	A	Supports proposals other than Hatches and proposes its removal from the WCNP
12	All R	Using a common form to object to inclusion of Hatches on grounds:
52		1 outside village boundary
53		2 will set a precedent for remainder of land owned by WSCC
54		3 could give rise to 50+ homes
55		4 wrong to have all development in The Village
56		5 after Steele Close no more need in parish
57		6 infrastructure and schooling would not support 30 families
58		7 access onto Broadford Bridge Road is flawed
59		8 neither Broadford Bridge Road nor the village cross roads could cope with the additional traffic from 15 homes
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	Index	RAB	Comment
	61		9 poor drainage and flooding in Broadford Bridge Road
	62		10 TPOs on 10 trees
	63		11 loss of a farmer's livelihood
	64		12 no enhancement to village
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	92	R	There are better sites in West Chiltington
	94	R	Although strongly supportive of additional housing rejects Hatches as they should be spread more evenly across parish
	95	R	Proposal well considered. Supports affordable housing and this site
	96	R	Rejects as Steele Close should be The Village site and wants development spread more evenly
	97	R	This is the wrong place by the Neighbourhood Plans own observation, of poor access with high banks and 11 TPO's. A better site would be SA429 Haglands/Smock Alley which has easier access and would hardly have any impact visually on the Parish. It is also land which has not been used agriculturally for at least 40 years.
C			Smock Alley
	5	R	I feel that the WCNP need to look at more sites. For instance, in my opinion and others, there are two fields in Smock Alley/Southlands Land which must be ideal for development and I cannot understand why they have been overlooked for so long
	7	R	An ideal site
			The proposed development of 21 houses at Smock Alley. is in my opinion, and others, an ideal site for building. It has always been scrubland for as long as I can remember, and I was born here. It has good access, and I cannot understand why this site has not been looked at before.
	10	R	Supports rejection of Smock Alley because 63% of respondents to HNS were opposed to market value housing and it contain 15 out of the 21

	Index	RAB	Comment
			Additional reasons for rejection are traffic, flooding, separation zone
	14	R	Supports rejection of Smock Alley claiming strong public support
	16 23	R R	Supports rejection of Smock Alley
	18	R	The plan should not consider Land for development in Smock Alley.
	19	R	
	20	R	
	17 28 39 44	R R R R	Supports rejection of Smock Alley and argues for removal from Site Assessment Report
	22	R	Implicitly supports exclusion
	25	R	Disagrees with choice of Hatches over Smock Alley as a result of a lack of objectivity but accepts both sites are developable and prefers Smock Alley if only one should be developed
	28	R	Argues that comparison with the Hawthorns is inaccurate
	29	R	Argues that comparison with the Hawthorns is inaccurate and wants references removed
	31	R	Hatches to be excluded if Smock Alley is because the latter is the better site
	36	R	Opposes Smock Alley being developed
	37	R	As an ex-developer opposes development mainly on traffic grounds
	41	R	Development of Smock Alley site has recently been fully assessed and recommended for refusal from HDC again in line with both National and Local policy.
	42	R	being out of keeping with the local area; visual impact on the local area; market value homes not being a requirement for the village; the refusal of permission for the previous application by HDC for 21 properties
	51	A	Supports proposals other than Hatches and proposes its removal from the WCNP and replacement by Smock Alley
	76	R	Supports development. Roads good for this area. Access good and some affordable houses should be made available.
	92	R	This has got to be one of the best sites for building in West Chilton totally overlooked by WCNP why?
	94	R	Developing Smock Alley would spread the additional development that is supported more evenly across the parish

	Index	RAB	Comment
	97	R	A better site to Hatches would be SA429 Haglands/Smock Alley which has easier access and would hardly have any impact visually on the Parish. It is also land which has not been used agriculturally for at least 40 years.
	101	R	Wants removed from Site Assessment Report
			This proposal is for non-sustainable site due to limited accessibility to transport, distance to local amenities and reliance on the private car, and is therefore contrary to the adopted Core Strategy 2007 and the emerging strategy within the Horsham District Planning Framework which is to concentrate growth within the main settlements.
D			SA319
9	13	A	Proposes land south of the Pumping Station in Smock Alley SA 319 for up to 13 houses of a 2-3 bedroom size to suit families
	10	R	In considering Site Assessment Report wants this excluded as beyond the built up area boundary
E			Fly Farm
	51	R	Supports proposals other than Hatches and proposes its removal from the WCNP and replacement by Smock Alley and/or the Fly Farm site
F			Hatches House
	50	A	There is a proposal to add this site the list for development
G			Other issues
	2	R	Concern over impact of development on infrastructure, traffic and safety
			Supports development but argues for improved access to facilities to reduce traffic
	5	R	Without specifying where suggests better sites exist in The Common
	6	R	Questions whether 30 homes is enough given the housing crisis
	6	R	Does not agree with the two settlements state
			Questions the map of the proposed settlement gap
	10	R	20 affordable homes is adequate
			The rejected Smock Alley site should be removed from the appendix or rejected sites should all be grouped together separately
		R	Wants references to Haglands Lane corrected in favour of just Smock Alley

Index	RAB	Comment
13	A	Argues for a tolerance factor to be included to allow new sites to come forward during the lifetime of the NP to avoid its being restrictive
15	B	Argues for additional sites to be recommended for future housing provision
15	B	Challenges the presumption that development should be limited to local need based on a lack of 5 year housing supply.
		Interprets Horsham DCs requirements from neighbourhood planning to be an increase in previous expectations and suggests that if they reject this hypothesis then they are wrong
		Argues that WCNP does not conform to HDPF and proposes that a much greater provision of homes should be included in WCNP
21	R	Argues that HDPF para 4(e) prevents development beyond the built up area
27	R	Wants large houses replaced by care/retirement homes for older population
38	R	the overwhelming majority of the land covered by the plan is not in either of the two built up areas as defined in the plan. This is largely open farmland although the number of viable farms is continuing to decrease. These areas are therefore very vulnerable to fragmentation and unauthorised and inappropriate development which changes their character and that of the whole area. There are no policies in the draft plan designed to ensure that these areas are maintained and protected and to support appropriate forms of diversification to allow farms to remain viable.
39	R	Is concerned that the HNS on which the WCNP is based will become out of date as time passes and suggests an amendment to Policy H1 to read in line 3 "This proposal should deliver 20 of the currently identified need"
41	R	insufficient assessments on Brownfield land, and would like these sites assessed again
45	R	Proposes that the level of affordable homes in the plan should be based on AiRS view that 50% is appropriate or even one third based on experience in other parishes. Propose 10-16 in place of the 20 in the plan
46	R	Questions use of 15 home threshold believing it stems from Strategic Policy 15 in HDPF
		Draws attention to change in HDPF policy on affordable homes that occurred after the WCNP was published

	Index	RAB	Comment
			Considers 30 homes in total to be excessive rather than modest
			Asks for more detail of size and type of home in the proposals
	50	A	Argues that the HNS specifically showed approval for market value housing and questions the absence of market value housing in the first five years of the plan. Proposes that more sites that appear less constrained than Hatches should be included to confirm to the HNS ie VS01 Hatches House,
	74	R	All new homes should be affordable to meet the aspirations of residents
	96	R	Wants development in The Common to spread evenly with Village if Steele Close is developed and Hatches is not
H			Inconsistency between documents/Site Assessment Report
	10	R	Criticises the entries for SA319 and Smock Alley and wants them removed or changed.
	14	R	Draws attention to the inconsistency
	16 23	R R	It is a great pity that the Policy, which has widespread support, is not backed up by WCNP-PBE-1. I suggest modifying WCNP-PBE-1 to fit with Policy H1.
	17	R	Expresses concern and wants Smock Alley removed from Site Assessment Report
	22	R	Recognises the reasons why the WCNP, Site Assessment Report and SEA are different but asks for clarification to be included in WCNP itself.
	28	R	Wants references to Smock Alley removed from the Site Assessment Report
	39	R	Challenges almost everything relating to Smock Alley in Site Assessment Report
	41	R	There are many inconsistencies between the documents submitted
	44	R	Draws attention to the inconsistencies and asks for the removal of references in the site assessment report
	48	R	Draws attention to the inconsistencies with SA066 and SA319 and argues for the Site Assessment Report to be amended to conform to the WCNP or a separate section included to deal with rejected sites.
	81	R	Suspicion that the variance between the documents mask an intention to develop more than the WCNP shows
	10 101	R R	Wants Smock Alley removed from Site Assessment Report
I			Flawed process
	15	A	site assessment and allocation process adopted by the WCNP Group to date has been seriously flawed and is therefore unreliable and unsound.
	41	R	Criticises process because of "bias and predetermination". "The process was undemocratic and not wholly representative of the village wishes, just a small minority."
	48	R	Considers the inconsistency is evidence of a flawed process

	Index	RAB	Comment
	25	R	Disagrees with choice of Hatches over Smock Alley because of a lack of objectivity
	51	A	Questions the correctness of the site assessment and decision process