

Marshall Monks
West Chiltington Parish Council,
The Parish Office,
Church Street,
West Chiltington,
RH20 2JW

Our ref: WCNP Reg. 15

Your ref:

Date: 21 December 2018

By Email

Dear Mr. Monks,

Response to West Chiltington Neighbourhood Plan submission

Thank you for your submission of the West Chiltington Neighbourhood Plan to Horsham District Council on 19 November 2018.

The council has carefully reviewed the submission documents with reference to the issues raised in our letter dated 25 October 2018 and previous correspondence between Horsham District Council and the Parish Council, which outlined a number of important concerns with the emerging plan. Unfortunately, it is our view that a number of our concerns remain to be comprehensively addressed.

It is this council's responsibility to determine if the necessary legislative requirements have been met as set out in Schedule 4B to the Town and Country Planning Act 1990 in order for the plan to progress to Regulation 16 and onto independent examination. In assessing the plan, the council needs to be reassured that the plan is sufficiently robust to meet the basic conditions. Regrettably the council has concluded that the emerging plan does not meet the basic conditions and would be found unsound if left to continue towards independent examination. In reaching this conclusion we would highlight the following key points:

1. We commend the Parish Council for undertaking a formal AECOM Housing Needs Assessment which reflects our previous advice, however, we consider that 'best endeavours' have not been made to meet the plan area's Objectively Assessed Need (OAN) through the objective consideration of sites to accommodate the housing figure put forward in the AECOM assessment;
2. We also consider that the Parish Council has not correctly followed the legislative process to the extent it needs to, which is an issue we have raised concerns about previously. To clarify, Regulation 14 consultation period is a statutory stage in Neighbourhood Plan preparation. Any consultation that is carried out under this regulation must therefore fully conform to its provisions. This means that all consultation bodies and stakeholders listed in Schedule 1 whose interest would be affected by neighbourhood plan must be invited to make comments. The district council are aware of at least two stakeholders who were not aware of the

formal Regulation 14 consultation period held in 2017 with one stakeholder being a local agent/developer. For the District Council to minimise any subsequent risk of a successful judicial review, it is essential that a full and thorough re-consultation is held.

Clearly, we are disappointed that the issues we raised in the previous series of correspondence has not been sufficiently addressed and that we cannot be more positive in our response to you. In light of position reached, we would suggest meeting with you as soon as possible in the New Year to agree how the deficiencies we have identified can be addressed. We look forward to hearing from you with some suitable dates.

Yours sincerely,



Norman Kwan
Senior Neighbourhood Plan Officer