

## Inset Maps: South Harting

### Not Compliant with Legal and Procedural Requirements

1. There has been no public/statutory consultation on the settlement boundary changes that have been made subsequent to *The Preferred Options* consultation: this is required under Regulation 18. The current consultation is only on the matter of 'soundness' and legal/procedural compliance under Regulation 19.
2. The Gunning Principles have been ignored. These state *inter alia* that
  - 2.1 consultation must be undertaken at a time when proposals are still at a formative stage,
  - 2.2 consultation must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response, and
  - 2.3 the demands of fairness are likely to be higher when the consultation relates to a decision which is likely to deprive someone of an existing benefit (*Moseley v. Haringey* 2012).
3. Also, the *English National Parks and the Broads: UK Government and Circular 2010* requires National Parks to engage with their communities "... in an effective and co-ordinated way ..." (para 101). The consultation which has taken place has failed to "understand the resident community's economic and social view of the area they live in ..." (para 102).

### Changes not justified

4. There has been no consultation on the increase in area of SD90.
5. There has been no consultation on the allocation of SD91.
6. The *Sustainability Appraisal* shows that both sites have an 'uncertain' impact at minimum on both the landscape and the cultural heritage of this area of the SDNP.
7. As argued by Harting Parish Council under the relevant policy responses, they should not have been allocated for development in a landscape-led Local Plan; they are equally inappropriate given the SDNPA's purposes and its Vision for 2050.

### Changes necessary to make the document sound or legally compliant

1. The allocations in South Harting, SD90 & 91, should be removed from the Local Plan and the settlement boundary in those locations should be re-instated to its previous position.
2. Harting Parish Council has proposed an alternative site to replace SD90 & 91. It will provide at least as many **affordable** homes as those sites added together and possibly more.