



**Horsham
District
Council**

Representation Form

Cowfold Neighbourhood Plan 2019-2031

The Neighbourhood Planning (General) Regulations 2012 (as amended) - Regulation 16

Cowfold Parish Council has prepared a Neighbourhood Development Plan (NDP). 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 NDP and associated documents will go out to consultation (from 5pm **Monday 23rd March – midnight on Monday 18th May 2020**) for 8 weeks inviting representations on the draft submission plan, basic conditions statement, consultation statement and the Strategic Environmental Assessment (SEA). Supporting Background Papers are for information purposes only.

Copies of the Cowfold Neighbourhood Plan and supporting documents are available to view on the Horsham District Council's website:

<https://www.horsham.gov.uk/planningpolicy/planning-policy/currentconsultations>

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. Please email neighbourhood.planning@horsham.gov.uk to make an appointment to view the plan. Or alternatively you can view the plan at:
- **Cowfold Village Hall, Bolney Rd, Cowfold, RH13 8AA**

With the current COVID-19 crisis the availability and access to Cowfold Village Hall will be dependent on further government advice. With the consent of the Parish Council it was agreed that should you want to view the plan at Cowfold Village Hall please contact the following: **Jason Bailey on 07951 133551 or email: jasebailey72@gmail.com** to make an appointment. Please ensure you take the necessary precautions and follow government advice regarding hand hygiene and social distancing.

All comments must be received by midnight on Monday 18 May 2020

There are a number of ways to make your comments:

1. Please use the above web address above to make your representation online ; or
2. Complete this form and email it to: neighbourhood.planning@horsham.gov.uk ; or
3. Print this form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

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 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, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	[REDACTED]
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	Southern Water
Position (if applicable)	Regional Planning Lead
Date	14/05/2020

PART B

To which part in the plan does your representation relate?

Paragraph Number:		Policy Reference:	Policy 5: Open Space
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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:

Southern Water understands the desire to protect countryside areas and open spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

Policy 5 (ii) seeks to prevent development that results in a loss of open space, however the open spaces to which this policy applies have not been determined on a policy map, and in addition the amount of loss that would be prevented is not determined, therefore we may assume that no loss would be acceptable. However, in terms of the delivery of new water or wastewater infrastructure (e.g. a new pumping station), there may be limited options available for its location due to the need to connect into the existing sewerage network. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that *'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'*

What improvements or modifications would you suggest?

Having regard to the issue set out above, Southern Water propose the following additions (additional text underlined) to **Policy 5: Open Space**

Development proposals that result in a loss of open space will not be supported other than for the purposes of essential utilities infrastructure (where no reasonable alternative site is available),

(Continue on separate sheet if necessary)

To which part in the plan does your representation relate?

Paragraph Number:	N/A	Policy Reference:	N/A
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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:

Additional policy on the provision of water and wastewater infrastructure

Southern Water is the statutory water and wastewater undertaker for Cowfold and as such has a statutory duty to serve new development within the parish.

Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.

We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2018) paragraph 28 establishes that communities should set out detailed policies for specific areas including *'the provision of infrastructure and community facilities at a local level'*. Also the National Planning Practice Guidance states that *'Adequate water and wastewater infrastructure is needed to support sustainable development'*.

Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

What improvements or modifications would you suggest?

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan

(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 19 of the Neighbourhood Plan (General) Regulations 2012 in relation to the Cowfold Neighbourhood Development plan?

Please tick here if you wish to be notified: