



**Pulborough Neighbourhood Plan Examination  
Statement by Horsham District Council in response  
to the Independent Examiner's Request for points of  
Clarification (sent 28 July 2021)**

**Questions for the District Council**

25 August 2021

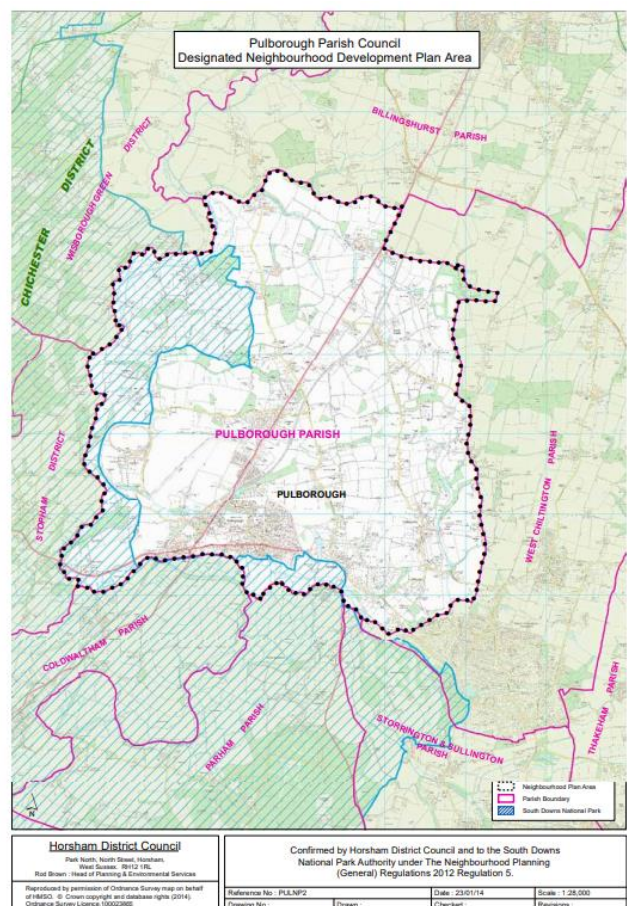
## 1.0 Introduction

2.0 This statement is in response to the Examiner’s request for clarification in relation to three points. Firstly, in regards to the changes to the National Planning Policy Framework (NPPF). Secondly, which of its District Planning Framework policies, are for the purpose of the basic condition, the strategic policies that the neighbourhood plan has to be in general conformity with. Thirdly, details of planning history of land formerly known as Toat Café.

## 3.0 Context

2.1 Pulborough Parish Council was designated as a Neighbourhood Plan area on 25 February 2014 and is shown in Figure 1 below. The Steering Group leading the preparation of the neighbourhood plan has undertaken extensive engagement on a range of evidence gathering activities and consultation events.

2.2 The Parish Council published a Pre-submission plan for consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. The consultation was held for eight weeks from 6 July to 31 August 2020. Comments were considered and the Pre-Submission Plan was amended accordingly. A revised “Submission Plan” was then formally submitted to Horsham District Council on 23 October 2020. The Council, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, held a consultation on the Pulborough Submission Draft Neighbourhood Plan. Representations were invited for eight weeks between 18 November and 12



August 2020. A second Regulation 16 consultation was held on new evidence between 26 April and 7 June 2021.

- 2.3 The Coronavirus COVID-19 outbreak has had an effect on all of our lives. At HDC we will keep all of our communities and Neighbourhood Planning groups up to date with any changes or updates. In regards, to the Local Plan Review, there have been no changes to the Government's requirements for Local Plan preparation. Therefore, the Council will continue the work on the preparation of the Local Plan and Regulation 19 Submission Documents, whilst having regard to the up to date Government guidance if/as it changes. Please click on the following link: <https://www.horsham.gov.uk/planning/planning-policy/local-development-scheme> for further details.

### **3.0 Questions for HDC**

*Question one: With the recent changes to the national policy context, my examination will need to assess whether the changes to the Framework will have a material impact on my assessment of the basic conditions, particularly whether the plan has regard to the policy and advice of the Secretary of State. I would invite the LPA and the Parish Council to comment on whether the changes to the Framework should have a material impact on my conclusions.*

- 3.1 The National Planning Policy Framework (NPPF) was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.
- 3.2 We note that paragraphs 29, 30, 37 and 67 of the NPPF 2021 relating to neighbourhood planning remain unchanged, such that the role of neighbourhood plans and requirement to meet the basic conditions are still in place.
- 3.3 Amended paragraph 70 of the NPPF 2021 states neighbourhood planning groups should give particular consideration to the opportunities for allocating small and medium-sized sites suitable for housing in their area. Paragraph 69a

defines small and medium sites as no larger than one hectare, and states these should accommodate at least 10% of the housing requirement. Pulborough NDP steering undertook call for sites in both 2014 and 2017. A total of 33 sites were submitted for consideration. A detailed site assessment was undertaken resulting in the allocation of 6 sites for residential development in the PNDP. Four of the allocated sites are less than 1 hectare and account for 79 of the total housing requirement. This is well in excess of the 10% required by paragraph 69a and it is therefore considered the preparation of the PNDP has been consistent with paragraph 70 of the NPPF.

- 3.4 The NPPF 2021 places greater emphasis on the role of design with place-making and beauty a strategic theme of the Framework. There are also expectations that local authorities produce their own design codes and guides setting out design principles which new development in their areas should reflect. Paragraph 127 recognises neighbourhood planning groups can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development, both through NDPs and engaging with the production of design policy, guidance and codes by LPAs and developers. Policy 15 of the Pulborough NDP sets out local design expectations, referring to the guidance developed in the Pulborough and Nutbourne Design Statements. This approach is consistent with the NPPF's emphasis on design guidance informed by the identification of the special qualities of an area.
- 3.5 Paragraph 176 of the NPPF refers to National Parks, the Broads and Areas of Outstanding Natural Beauty. This paragraph now states that development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Part of the Pulborough neighbourhood area is within the South Downs National Park and the village is within its setting. The SDNPA responded to the Regulation 14 consultation and subsequent amendments were made to the PNDP to include specific reference to conserving and enhancing the landscape character of the National Park, as well as enhancing key views and views of key landmarks within the National Park and make reference to Dark Night skies guidance. It is noted that the SDNPA have not objected to the policies or allocations at the Regulation 16 consultation.

- 3.6 In conclusion, it is our view that whilst there are amendments of note within the NPPF 2021, these do not have a material impact on the Examiner's assessment of the basic conditions, particularly whether the plan has regard to the policy and advice of the Secretary of State.

*Question two: Can Horsham District Council confirm which of its District Planning Framework policies, are for the purpose of the basic condition, the strategic policies that the neighbourhood plan has to be in general conformity with? I do not require that information for the part of the plan area in the National Park*

- 3.7 Horsham District Council can confirm the following are Strategic Policies identified in the HDPF are as follows:

Policy 1 Strategic Policy: Sustainable Development

Policy 2 Strategic Policy: Strategic Development

Policy 3 Strategic Policy: Development Hierarchy

Policy 4 Strategic Policy: Settlement Expansion

Policy 5 Strategic Policy: Horsham Town

Policy 6 Strategic Policy: Broadbridge Heath Quadrant

Policy 7 Strategic Policy: Economic Growth

Policy 8 Strategic Allocation: University Quarter Mixed Use Development

Policy 12 Strategic Policy: Vitality and Viability of Existing Retail Centres

Policy 15 Strategic Policy: Housing Provision

Policy 16 Strategic Policy: Meeting Local Housing Needs

Policy SD1 Strategic Policy: Land North of Horsham

Policy SD10 Strategic Policy: Southwater Strategic site

Policy SD11 Strategic Policy: Land South of Billingshurst

Policy 21 Strategic Policy: Gypsy and Traveller Sites Allocations

Policy 23 Strategic Policy: Gypsy and Traveller Accommodation

Policy 24 Strategic Policy: Environmental Protection

Policy 25 Strategic Policy: The Natural Environment and Landscape Character

Policy 26 Strategic Policy: Countryside Protection  
Policy 27 Strategic Policy: Settlement Coalescence  
Policy 32 Strategic Policy: The Quality of New Development  
Policy 35 Strategic Policy: Climate Change  
Policy 36 Strategic Policy: Appropriate Energy Use  
Policy 38 Strategic Policy: Flooding  
Policy 39 Strategic Policy: Infrastructure Provision  
Policy 42 Strategic Policy: Inclusive Communities

*Question three: Can the District Council give me a short precis of the planning history of this site (land formerly known as the Toat Café), so I can understand the planning status of the uses currently on the site:*

- 3.8 The planning history for Toat Café site is enclosed within the attached Excel spreadsheet.
- 3.9 Planning permission was granted for a car wash facility and the site also has permission as a café and car wash facility only. There is no reference to any other activities being lawful either through permission or having been carried out for over 10 years. As sited in a prominent location it is envisage any proposed use would be sensitive to the rural character of the location and the setting of the national park.