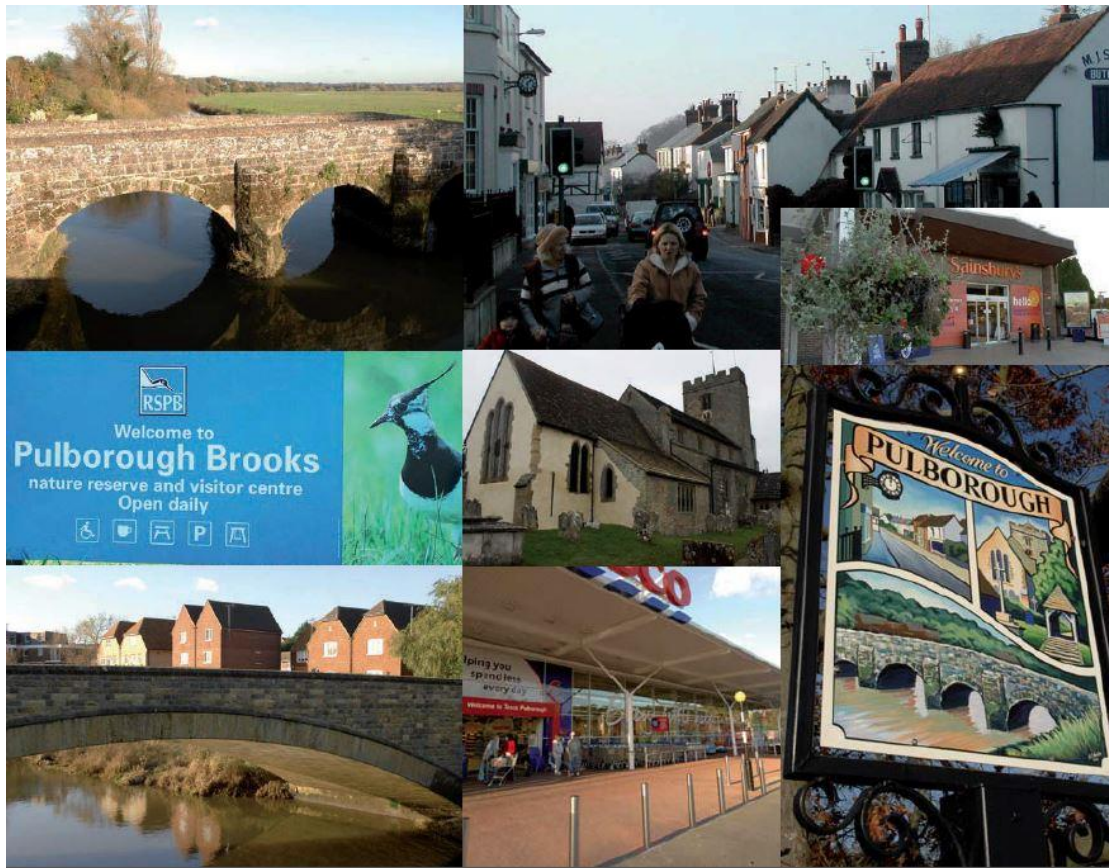


PULBOROUGH PARISH NEIGHBOURHOOD PLAN 2015 - 2031



Statement in Response to Initial Comments of the Independent Examiner

25th August 2021

Pulborough Neighbourhood Plan 2015-2031

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Reply to Examiner

Pulborough Parish Council and its associated Steering Group would like to express thanks to the Independent Examiner, John Slater, for all the hard work that he has carried out in examining our Plan and for the time that he has taken to respond with his comments.

We trust that the following replies will provide a satisfactory response to the questions that he has raised.

In conclusion we would like to express our willingness to allow the Examiner to recommend any modifications that he thinks are necessary for this Plan to meet all Basic Conditions and for the Plan to subsequently proceed to Referendum.

Dr A Tilbrook

Chairman, Pulborough Neighbourhood Plan Steering Group

25th August 2021

1.0 Regulation 16 Comments (Examiner's point 3)

1.1 Replies from Statutory Bodies

West Sussex County Council (WSCC)

The comments made by WSCC were noted, particularly those that related to Policies 2, 3 and 44. The Parish Council is happy to accommodate further modifications recommended by the Examiner.

Environment Agency (EA)

The EA had no comments to make on the PNDP. However, the Parish Council noted that the EA acknowledged that every effort had been made to allocate housing within the lowest areas of flood risk, and that the major housing sites allocated referred to the provision of Biodiversity net gains.

Historic England (HE)

HE had a number of comments to make at both Regulation 14 and Regulation 16 stages. As a result of these comments, meetings have taken place with HE and both the Pulborough Neighbourhood Plan Steering Group (PNPSG) and Horsham District Council (HDC) to address these comments and to amend the Pulborough Neighbourhood Development Plan (PNDP) as necessary. Please refer to supporting evidence/background papers on this matter.

South Downs National Park (SDNP)

SDNP were fully supportive of the NP. The PNPSG and the Parish Council have acknowledged and noted the comments made but decided that no amendments were needed at this stage.

1.2 Replies from land owners and or their agents

A number of comments were received from landowners whose sites have been included within the Plan and from other landowners whose sites were rejected. The PNPSG and the PC considered all these comments but did not consider that any amendments needed to be made prior to Examination.

1.3 Replies from members of the public

The PNPSG and Parish Council addressed all the points made by the general public at Regulation 16 stage and were heartened by the number of comments in support which seemed to outweigh those against. They considered in particular comments received in relation to Policy 2; the site at New Place Nurseries and to Policy 11; the West Glebe Field. Whilst the PNPSG and PC respected all these comments, it was felt that all Basic Conditions and necessary consultation had been undertaken in respect of both sites and that no amendments were necessary.

2.0 Changes to the NPPF (Examiner's points 4-8)

Comments from the Parish Council on the recent July 2021 changes to the NPPF and if they materially affect the PNDP

2.1 The recent publication of the revised NPPF in July 2021 has been reviewed and the recent amendments have been noted. It is the consideration of the Parish Council that the emerging Pulborough Neighbourhood Development Plan is still in general conformity with the Framework and therefore meets the Basic Conditions.

2.2 New developments should plant trees

From a local perspective, both the Parish Council and the PNPSG support in principle that new development should implement tree lined streets, where possible and practical. They appraised all chosen sites and whilst supportive of the new measures were satisfied that all policies would address this issue accordingly in one form or another if practical.

In particular, their findings were as follows:

Policies 2 and 3: The developer's plans seek to keep all existing trees whilst at the same time removing non-native species. In addition, and in support of the Policy, a large countryside park has been included abutting the overall site. Two footpaths already cross the site and it is intended that the developer will be made aware that, where possible, these paths should be tree-lined by the retention of existing trees.

Policy 4: This is a brownfield site where the existing land strata would not support planting of trees.

Policy 5a: This is a brownfield site but there are numerous mature trees, some with TPO's, already in situ and these would be afforded appropriate protection. There is an area of wetland between the main recreation ground and the land on which the garage stands which is not currently being maintained. This area could be improved upon to provide a natural feature. Further investigation into ground conditions would be required to support the viability of further tree planting.

Policy 5b: This is also a brownfield site, currently being used as a car park. There are already some trees on the perimeter of this site. Support is given to the retention of existing trees where possible.

Policy 6: The developer will be made aware of the requirements within the latest NPPF for tree-lined streets.

2.3 **Improved Design Quality**

Paragraph 133 within the latest NPPF introduces a new test to ensure that new developments are well-designed and are beautiful and safe places. The Parish Council and PNPSG support this test and will ensure that these measures are addressed at planning stage for each development within the Plan. In particular, the Parish Council will ensure that sufficient weight is given to this requirement in all new planning applications to ensure that they adequately reflect these features and in particular that they address issues within the Pulborough Design Statement also.

2.4 **Solar and flood zones**

Part of the parish of Pulborough is low lying and as such is susceptible to flood risk. Whilst many measures have been undertaken, by the Environment Agency in particular, to mitigate these risks the current concerns about climate change, particularly increasingly heavy rain storms as well as rising sea levels, may require further action. The Parish Council supports the latest NPPF in identifying the need for solar farms as essential infrastructure.

2.5 **Sustainable development**

The Parish Council supports the greater emphasis being placed on sustainable development and has always sought to highlight this requirement with the District Planning Authority during planning procedures as sustainability is vitally important within a village community.

2.6 **Faster delivery of public service infrastructure**

The Parish Council supports this new measure which again is necessary within a village environment to support any additional homes. Housing developments in the Codmore Hill area have not been supported by public service infrastructure.

3.0 **Allocation Sites (Examiner's point 10)**

3.1 The Parish Council has contacted landowners or their agents/representatives of the sites the Examiner has queried to ask them to provide evidence that sites proposed within the PNDP are deliverable and available to come forward as allocations. The expectation is that all allocations will be delivered during the lifetime of the Plan and accord with policy.

3.2 The responses that have been received are set out in the following tables A-E:-

TABLE A

Details	Response
Name (landowner or agent):	Cobbetts Developments Ltd
Site name, reference or policy number in PNDP	PPNP05, Policy 4, Land at Station Approach
Number of Units Proposed:	18 (As per policy)
Will the site come forward in lifetime of the plan?	Yes
Does the site have Outline Planning Permission?	No
Is the site identified on the brownfield register?	No
Does the site have Permission in Principle status?	No
Has there been a Planning Performance Agreement in place for the site with Horsham District Council?	No

TABLE B

Details	Response
Name (landowner or agent):	Harwood Garages
Site name, reference or policy number in PNDP	PPNP06, Policy 5a, Harwoods Garages
Number of Units Proposed:	15 (As per policy)
Will the site come forward in lifetime of the plan?	Yes
Does the site have Outline Planning Permission?	No
Is the site identified on the brownfield register?	Yes
Does the site have Permission in Principle status?	Yes
Has there been a Planning Performance Agreement in place for the site with Horsham District Council?	Yes

TABLE C

Details	Response
Name (landowner or agent):	Harwoods Garages
Site name, reference or policy number in PNDP	PPNP07, Policy 5b, Harwoods Garages Car Park
Number of Units Proposed:	9 (As per policy)
Will the site come forward in lifetime of the plan?	Yes
Does the site have Outline Planning Permission?	No
Is the site identified on the brownfield register?	Yes
Does the site have Permission in Principle status?	Yes
Has there been a Planning Performance Agreement in place for the site with Horsham District Council?	Yes

TABLE D

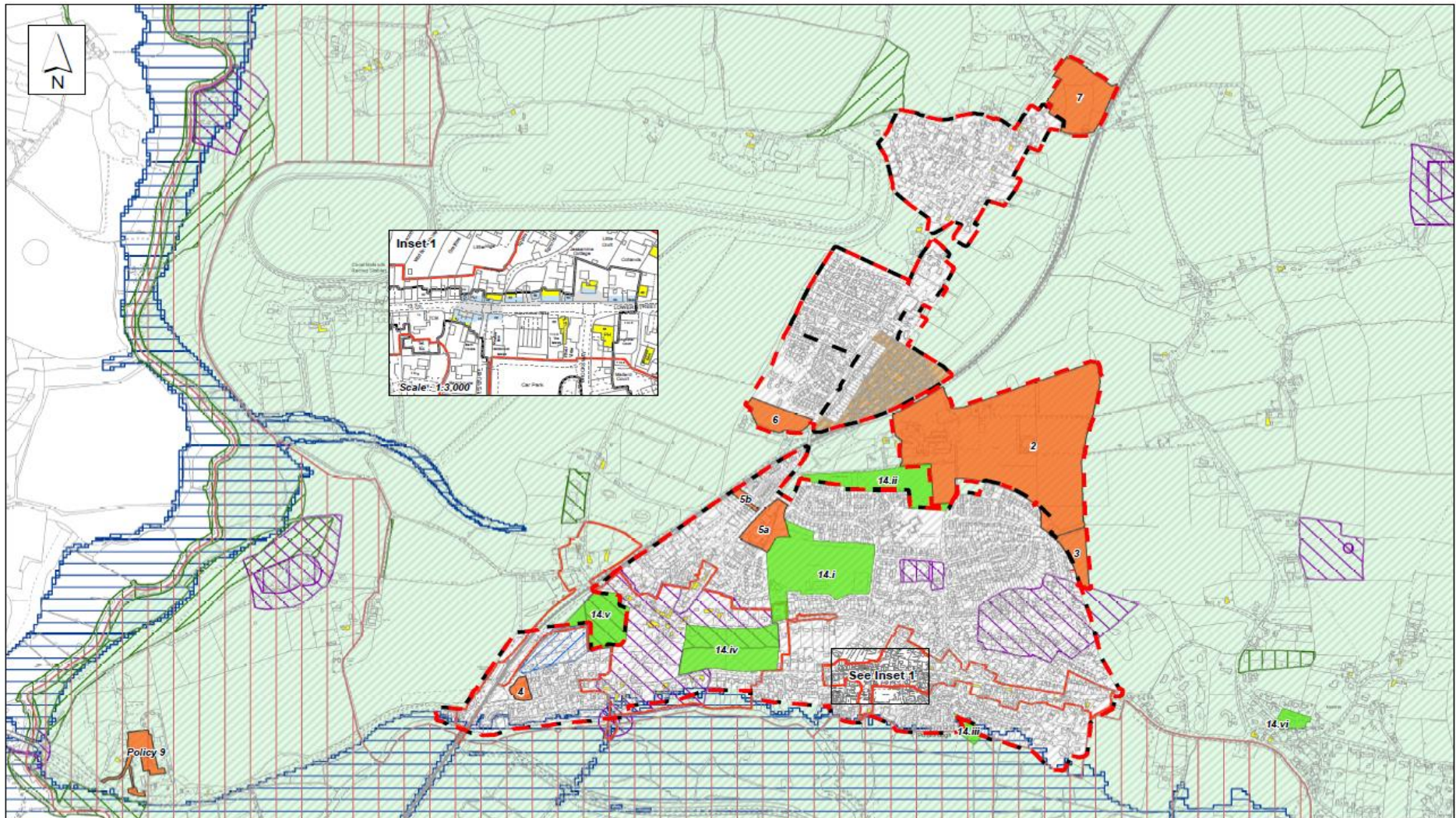
Details	Response
Name (landowner or agent):	Mr Shillingford
Site name, reference or policy number in PNDP	PPNP17, Policy 6, Land at Highfields
Number of Units Proposed:	26 (As per policy)
Will the site come forward in lifetime of the plan?	Yes
Does the site have Outline Planning Permission?	No
Is the site identified on the brownfield register?	No
Does the site have Permission in Principle status?	No
Has there been a Planning Performance Agreement in place for the site with Horsham District Council?	No
Additional supporting information provided:	Confirmation that an ecological survey, a site survey and tree surveys have been undertaken.

TABLE E

Details	Response
Name (landowner or agent):	CPA Property Chartered Surveyors
Site name, reference or policy number in PNDP	PPNP27, Policy 8, Land at Former Toat Café
Number of Units Proposed:	Mixed/Commercial (As per policy)
Will the site come forward in lifetime of the plan?	Yes – within 5 years
Does the site have Outline Planning Permission?	No – application anticipated by end of 2021
Is the site identified on the brownfield register?	Partially
Does the site have Permission in Principle status?	No
Has there been a Planning Performance Agreement in place for the site with Horsham District Council?	No

4.0 Policy 1: Spatial Plan for the Parish (Examiner's points 11 and 12)

- 4.1 The Parish Council and PNPSG support the Examiner's suggestion that the Brookfields development adjacent to PPNP17 site should be incorporated in the development boundary. An indicative inset plan follows, showing the potential revised settlement boundary subject to planning:-



Horsham District Council

Parkside, Chart Way, Horsham
West Sussex RH12 1RL

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Proposed BUAB amendments	Ancient Woodland	LDF2007 Housing Sites
Current BUAB	Archaeological Site	LDF2015 Key Employment Areas
Local Green Spaces	Local Wildlife Site	Outside BUAB
Allocations	SSSI	LDF2015 Town & Village Centres
Conservation Area	Flood Risk	LDF2015 Primary Shopping Frontages
National Park	Listed Building	LDF2015 Main Shopping Areas
Scheduled Monuments	The Mens SAC 12km buffer	

Inset Map: Pulborough Neighbourhood Plan
Please note this is indicative only and subject to planning.

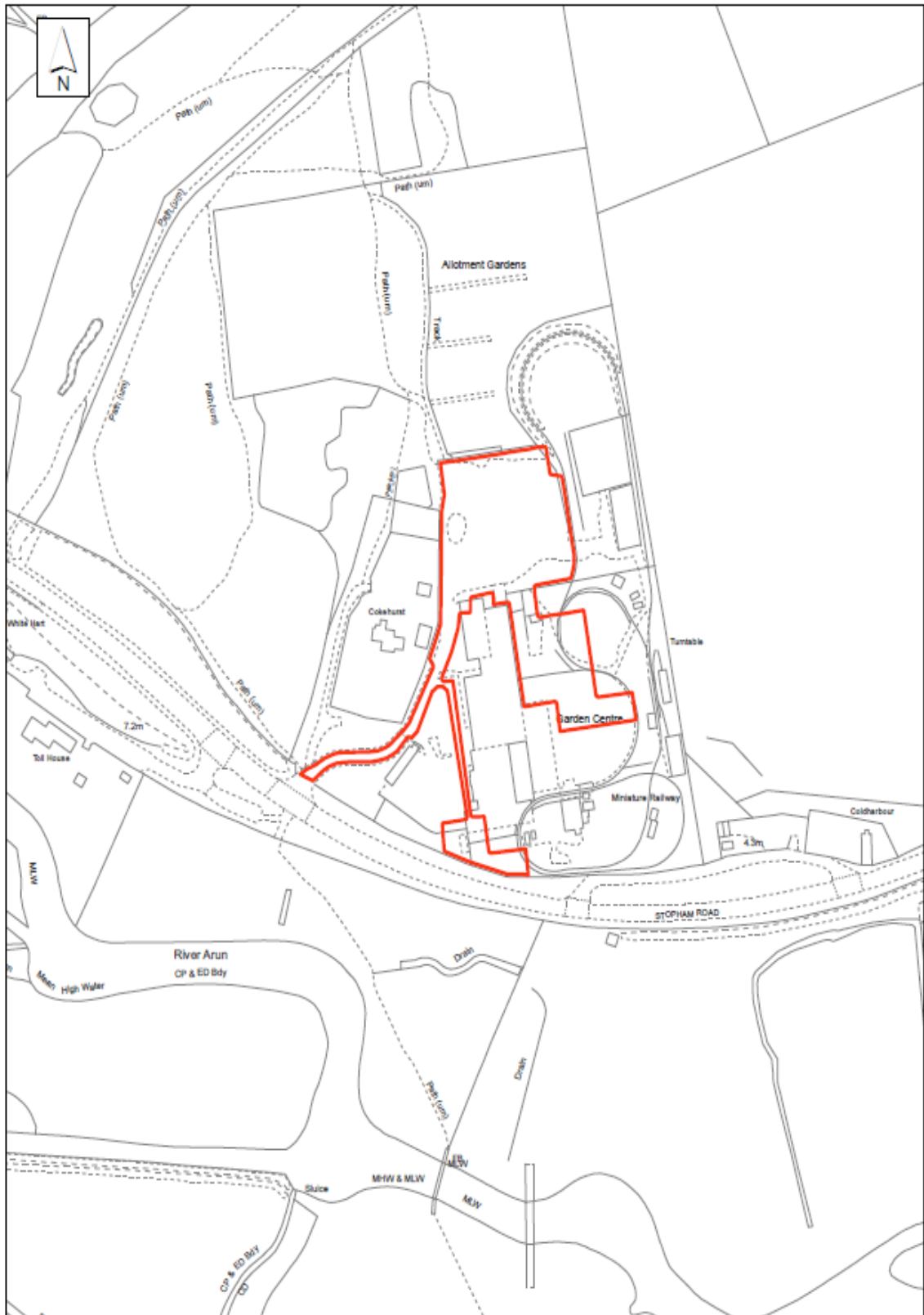
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Drawing No :	Checked :	Revisions :

5.0 Policy 7: Broomers Hill Industrial Estate (Examiner's point 13)

- 5.1 The Parish Council and PNPSG can confirm that the parcel of land adjacent to the A29 that the Examiner refers to is under different ownership from the industrial site and did not come forward in either of the two Call for Sites stages of developing the Neighbourhood Plan.

6.0 Policy 9: Pulborough Garden Centre (Examiner's point 15)

- 6.1 The following map shows the land which is the subject of this Policy. This is also now incorporated in a revised Policies Map/Spatial Plan (see Section 4.0).



Horsham District Council Parkside, Chart Way, Horsham West Sussex RH12 1RL		Policy 9: Pulborough Garden Centre Extension	
Reproduced by permission of Ordnance Survey map on behalf of HMSO. © Crown copyright and database rights (2021). Ordnance Survey Licence.100023865		Reference No :	Scale : 1:2,500 (at A4)
		Date: 20/08/2021	Revisions :
		Drawing No :	

7.0 Policy 13: Community Facilities (Examiner's points 16 and 17)

- 7.1 The River Arun is a natural feature running through the community and has always been synonymous with Pulborough, both from visual and from practical points of view. Boating/watersport activity has increased within the community especially since the recent lockdowns. A recently developed Wildart Trail has sought to attract visitors to experience the river as well as the Wildbrooks, the RSPB Reserve and the SDNP.
- 7.2 The purpose of the statement that any proposals that would prevent the old canal being reinstated would not be supported reflects the Parish Council's support of the Wey & Arun Canal Trust in protecting this important community asset and objecting to any development that would impact upon that vision of canal reinstatement. However, the Parish Council and PNPSG are supportive should the Examiner decide to recommend that this be the subject of a separate policy or of a Community Aim.
- 7.3 The following plan shows the route of the present and proposed canal, based on details downloaded from the Wey & Arun Canal website. The Plan also shows the course of the River Arun which for the most part identifies and forms part of the Pulborough parish boundary:-

8.0 Summary

- 8.1 In conclusion, the Pulborough Parish Council and its associated Steering Group thank the Examiner for his diligence and patience and trust that the information that has been provided within this document sets out in detail the answers to the initial comments and questions raised.