



**Horsham
District
Council**

Representation Form

Pulborough Neighbourhood Plan 2019-2031

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

Pulborough Parish Council has been preparing a Neighbourhood Plan. We have updated the evidence base regarding heritage issues to support the submission draft Pulborough Neighbourhood plan. It was considered appropriate to go out to consultation on new evidence to ensure stakeholders had an opportunity to comment on it. If you have made previous comments to the last Regulation 16 consultation (**18 November 2020 to midnight 13 January 2021**) please note your comments will still be considered and will be passed onto the examiner in full. There is no requirement to send in your previous comments. This consultation is for 6 weeks from **5pm 26 April 2021 to midnight 7 June 2021**. There are a number of ways to make your comments:

1. If you would like to make a representation on the new evidence to support Pulborough Neighbourhood Development Plan or make general comments on the plan, please use the weblink below to access the documents and download the comment form to make your representation.
2. Complete the comment form (available to download) and email it to: neighbourhood.planning@horsham.gov.uk; or
3. Print out the comment form and post it to: Neighbourhood Planning Officer, Horsham Council, Parkside, Chart Way, North Street, Horsham, RH12 1RL

To view the plan and supporting documents please use the weblink below:

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

Documents will not be made available in deposit locations due to the current COVID-19 pandemic. If local residents have difficulty in engaging online we have provided a telephone number and email address below. This will be on a message service where members of the public are encouraged to leave their details for an officer to contact them back if they need further information.

Email: neighbourhood.planning@horsham.gov.uk – SAS@southdowns.gov.uk

Telephone: 01403 215398

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	
Address	
Postcode	
Telephone	
Email	
Organisation (if applicable)	
Position (if applicable)	
Date	28 th May 2021

PART B

To which part in the plan does your representation relate?

Paragraph Number:	All	Policy Reference:	All
-------------------	-----	-------------------	-----

Do you support, oppose, or wish to comment on this plan? (Please tick one answer)

Support ☐ Support with modifications ☐ Oppose ☒ Have Comments ☐

<p>Please give details of your reasons for support/opposition, or make other comments here:</p> <p>Further and additional to my comments submitted against the original regulation 16 consultation on the Pulborough Neighbourhood plan, and in light of both the new evidence submitted and alterations made to the plan and accompanying Consultation Statement, I now wish to raise further representations covering 3 aspects of the proposed plan.</p> <ol style="list-style-type: none"> 1) I share the concerns raised by Historic England concerning the archaeological importance of the land constituting policies 2 and 3 in plan. There appears clear evidence of the likely existence of Roman remains on these sites which are of inevitable importance to the heritage of this country and to this specific area. Surely this should be fully investigated before simply concreting over these potentially historically valuable sites with a new housing estate? The responses from Pulborough Parish Council and the Neighbourhood Steering Group on the concerns raised by Historic England are woefully inadequate and I'm afraid continue to display a blasé attitude to this issue, leaving the impression that they wish to push this aspect of the plan through whatever the cost and without any due consideration to ethical aspects such as history, heritage, environmental concerns, damage to wildlife, increase in carbon footprint or sustainability. 2) I am pleased to note that within the revised Consultation Statement, an acknowledgment has finally been given that the land constituting policies 2 and 3 is indeed greenfield (page 15 / Issues and Concerns / a) i) "For clarification, the nurseries are considered to be greenfield and the Submission Plan going out for consultation has been amended."). <p>However:</p> <p>a) Nowhere in the updated Submission Plan that is available for this consultation has this been mentioned and no alterations have taken place to this effect. Policy 1, section 4.10 on page 26 of the Submission Plan continues to read "Most of the land at New Place Farm is intensively used with numerous structures including polytunnels..." – which ostensibly is a thinly veiled attempt to intimate to the reader that this is brownfield land. This simply isn't transparent enough to the facts, and directly contradicts the attestation within the Consultation Statement that the plan has been altered to make clear the greenfield status of this site.</p>
--

b) More importantly, the admission in the Consultation Statement that the site is greenfield now makes it clear beyond doubt that the Pre-Submission Plan published for the regulation 14 consultation actively misrepresented the facts around the nature of policies 2 and 3 to the Pulborough community for the purposes of that consultation. As a reminder the Pre-Submission Plan (Policy 1, section 4.10 on page 26) clearly stated "*Most of the land at New Place Farm is brownfield*". A direct contradiction of the facts and also the clarification now contained in the updated Consultation Statement.

Pulborough Parish Council and the Neighbourhood Plan Steering Group will likely argue that this is a minor and inconsequential change but it is actually hugely important to the Pulborough community because:

- i) This site represents by far the majority of the development acreage within the Submission Plan.
- ii) It fundamentally goes against one of the most vocalised (and published within the plan itself) wishes of the Pulborough Community that development is limited to brownfield sites and absolutely should not impinge on greenfield.
- iii) At the most basic level the regulation 14 consultation was conducted on a factually incorrect and actively misleading basis.

As a result in order to have any validity, the regulation 14 Consultation should be run again, this time with the correct facts in place around the nature of the land constituting Policies 2 and 3. I believe it is only fair that the Pulborough Community have the chance to comment with the facts in front of them, and certainly not a statement that the land is brownfield in any sort of perceived attempt to assuage anticipated objections to this aspect of the plan.

Should the plan move forward to independent examination and/or referendum without this corrective re-run of the regulation 14 consultation, then a legal challenge will now almost certainly be pursued either individually or through DLRA Ltd on behalf of all of its residents. The evidence after all is now quite simply there in black and white in the form of the direct contradiction between the Pre-Submission Plan statement and the amended Consultation Statement.

- 3)** It should be of interest and pertinence to any independent examiner that there appear to exist discrepancies in some of the plan content and statements around actual ownership of some of the land constituting policies 2 and 3. In our own conversations with the operators of the nursery on this site:

i) They do not appear to agree with the statements within some of the plan documentation that the operation is no longer commercially viable, and neither are they under the impression that they have been consulted on this. Which again raises concerns that the plan is proposing to remove one of Pulborough's few employers from operation.

ii) Whilst most of the nursery site is leased from the landowner, they are under the impression that certain portions of the site are actually within their own legal ownership and would not be made available for the proposed development. Why therefore would they be included within the Submission Plan when they are not available, particularly when numerous other locations on the Site Assessment Report have been immediately discounted for this very reason?

One is therefore left questioning whether the nursery operators have even been approached as part of what anyone would reasonably expect as due diligence within the drafting of the Submission Plan, or whether at face value negotiations have simply been restricted to the landowner benefitting from the potential sale.

I am not in a position to comment on the validity of these claims, but it does appear to be something bearing enough importance that it would need to be clarified within any independent examination.

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 Pulborough Neighbourhood Development plan?

I wish to be notified of all developments and decisions regarding the Pulborough Parish Neighbourhood plan.

Additionally I require confirmation that these comments in addition to my full comments submitted on 3rd December 2020 in response to the original 2020 regulation 16 consultation will be presented in full to any independent examination, should the plan proceed to that stage.

Please tick here if you wish to be notified:

☒