

Heather Knight
Clerk to the Parish Council
Pulborough Parish Council

Our ref: PPNP
Your ref: n/a

Date: 13th January 2021

By Email.

Dear Heather,

Re: Representations to Pulborough Pre-Submission Neighbourhood Plan (Regulation 14)

Thank you for consulting Horsham District Council on the Pulborough Submission Neighbourhood Plan. Horsham District Council is supportive of the Parish Council's work to develop their Neighbourhood Plan. We recognise that the Parish Council has undertaken a significant amount of work to reach this particular point and should be commended for all their hard work. The Council's detailed comments on particular policies are listed in the schedule attached to this letter. In addition, we wish to make the following general comments to the Submission Pulborough Parish Neighbourhood Plan as part of our response:

1. Pulborough is identified as a Larger Village in the settlement hierarchy as set out in Policy 3 of the adopted Horsham District Planning Framework (HDPF). There is an expectation that emerging neighbourhood plans are required to accommodate their fair proportion of the minimum 1,500 dwellings to be delivered from neighbourhood plans across Horsham in accordance with Policy 15 (4). Horsham District Council agrees with the quantum of housing set in the Pulborough Neighbourhood Plan namely a minimum of 294 dwellings allocated across seven sites in line with the HDPF.
2. There is an opportunity for a full or partial review of the Pulborough Neighbourhood Plan once the Local Plan Review has been through the legislative process and is suitably mature to provide the certainty for local groups to embark on a review of individual plans. The Local Plan Review may increase housing numbers within Pulborough, and we will continue to keep all of our community groups and neighbourhood plans informed of the Review's progress.

If you have any further questions regarding this representation or any of the comments submitted by Horsham District Council officers, please do not hesitate to contact me or my colleagues at the Specialist Advisory Service at the National Park Authority.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Norman Kwan'.

Norman Kwan
Senior Neighbourhood Planning Officer.

**Horsham District Council Comments to the Pre-submission
Pulborough Neighbourhood Plan (PPNP)**

13 January 2021

NP Paragraph No. / Policy No.	Suggested Change / Comment
General	<p>We made detailed comments on the pre-submission draft of the PPNP and we welcome the amendments that have been made in response to these comments.</p> <p>As commented at the Reg 14 consultation, we consider the plan would benefit from more diagrammatic representations of information or photos/plans etc. We also consider clearer red line boundaries should be provided for the site allocations and Local Green Space designations.</p>
Habitats Regulations Assessment (HRA) including Appropriate Assessment (AA)	<p>We note the conclusions of the HRA, principally that the contents of the PPNP has been screened out for any further assessment and the PPNP has demonstrated compliance with the UK Habitats Regulations 2017.</p> <p>The HRA states policies in the PPNP can be strengthened to explicitly ensure there will be no adverse effect on integrity of Habitats Sites. It is noted that the PPNP contains site specific requirements regarding protecting habitat for bats and sustainable drainage requirements.</p> <p>We also note the PPNP HRA states project level Appropriate Assessment will be required at application stage for each allocation. Strategic Policy 31 of the HDPF requires any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment.</p>
Objectives	<p>We welcome the commitment to prevent the loss of commercial space within the parish and the immediate vicinity.</p>
Policy 1	<p>We consider it may be helpful to provide reference to HDPF Policy 26 in the supporting text which is the strategic policy providing countryside protection and sets requirements for proposals outside of built-up area boundaries.</p>
Policy 2: Land at New Place Farm	<p>This is the most substantial site allocated for housing in the PPNP, allocating for approximately 170 dwellings. It is understood that this is the preferred site due to its proximity to local facilities and infrastructure and we welcome the inclusion of criterion vii seeking active travel routes to nearby facilities such as the school and shops.</p> <p>We also welcome the protection of existing field boundaries and mature native trees.</p> <p>Whilst it is noted and welcomed that the policy criterion requires appropriate play facilities within recommended walking distances, the final sentence of paragraph 4.12 appears to conflict with this requirement and should be deleted.</p> <p>Policy 2 xi. states a countryside park is to be provided at the north of the site, further detail should be given on the long term access to and management of this park. Currently part of the land identified for the countryside park is for private use by the angling club.</p> <p>We welcome the reference to enhancing local habitats and net biodiversity gain through the creation of the countryside park. It would also be helpful to provide further detail on the long term access to and management of this park.</p>

	<p>We welcome the reference to no net increase in water run-off from the site and ensuring water quality of the Arun Valley Ramsar site.</p> <p>The second part of criterion xi could be separated out into a separate criterion regarding green infrastructure.</p>
Policy 3: Land off Glebelands	<p>This smaller site adjacent to New Place Farm is intended for affordable and self build homes. The scheme may be delivered by a Community Land Trust.</p> <p>We welcome the reference to informal play provision and access to nearby facilities.</p>
Policy 4: Land off Station Approach	<p>Suggest criterion iii refers to the Pulborough Design Statement.</p> <p>We welcome the requirement of criterion viii for no net increase in water run-off given local localised drainage, flooding and water quality issues.</p>
Policy 5a: Land at Harwoods Garage	<p>The site is currently in employment use but is outside designated Key Employment Areas. The requirement for either relocation of the existing commercial floor space locally or suitable evidence of no viable use for employment use in line with HDPF Policy 9 is noted.</p> <p>In addition to appropriate protection for existing trees, the policy could seek new tree planting along London Road as part of its requirements to connect the urban fabric to the mature green corridor to the east.</p> <p>The north of the site is identified as an area of high surface water risk and there are water bodies in close proximity to the site. Given this, we welcome the policy requirement that development proposals ensure there is no net increase in surface water run-off, taking account of climate change. We also welcome the support for proposals which enhance the wetland area and increase biodiversity.</p>
Policy 5b: Harwoods Car Park	<p>It is understood that this site was considered by the NDP steering group to be suitable for older people's housing and it is queried whether the policy should reference this.</p> <p>Given localised drainage, flooding and water quality issues and proximity to nearby water bodies, we'd recommend development proposals ensure there is no net increase in surface water run-off, taking account of climate change and there may be opportunities to decrease existing run-off rates through the use of sustainable drainage (e.g. rain gardens and green roofs).</p>
Policy 6: Land at Highfields.	<p>The site is currently greenfield. Given localised drainage, flooding and water quality issues and proximity to nearby water bodies, we welcome the requirement for no net increase in surface water run-off taking into account climate change.</p> <p>We welcome the reference to informal play provision and access to nearby facilities.</p>
Policy 7: Broomers Hill Industrial Estate	<p>The site is currently greenfield. Given localised drainage, flooding and water quality issues and proximity to nearby water bodies, we welcome the policy requirement that development proposals ensure there is no net increase in surface water run-off, taking account of climate change.</p> <p>We welcome the support for non-vehicular modes of transport, including improved footpath / cycleway connection to existing PRoW.</p> <p>We would recommend this policy requires electric vehicle charging infrastructure.</p>
Policy 8: Land formerly known as the Toat	<p>We note and welcome the revisions made to this policy in response to our comments made during the Regulation 14 pre-submission consultation.</p>

Café, Stane Street	
Policy 11: West Glebe	<p>This policy supports an extension to the existing cemetery into land at West Glebe with the creation of a new public footpath.</p> <p>The Local Green Space Assessment identifies existing biodiversity value at this site. We recommend this is also addressed in the policy as well as the criteria regarding bats. We recommend additional criteria stating: "Proposals will be permitted where they are designed to make the most of opportunities to improve and create new biodiversity, habitats and green infrastructure".</p>
Policy 14: Local Green Spaces	<p>This policy proposes seven parcels of land as potential Local Green Spaces (LGS). HDC supports the principle of LGS designations. However, it is acknowledged that strict criteria must be satisfied before formal designation and there is the potential that the proposal put forward by the local community will not meet the requirements stipulated by Paragraph 100 of the National Planning Policy Framework. For information, we have provided this advice to other local community groups, and have also explained that an examiner of the plan will be required to consider if the proposal designation meets the requirements set out by national planning policy and may ultimately recommend alterations or deletion of the site to ensure the plan meets the basic conditions.</p>
Policy 15: Design	<p>We note and welcome the revisions made to this policy in response to our comments made during the Regulation 14 pre-submission consultation.</p>
Policy 16: Cycleways	<p>We support the aim of this policy to create signed cycle routes within the parish connecting to key destinations. The detail on potential routes is very helpful. Nevertheless, we consider this section should be moved to the Community Aims chapter, because it is not a planning policy and would not be used in development managements decision.</p>